

consultation response

Student Number Controls: Consultation on arrangements for 2014-15 onwards

UCAS' mission is to help learners make informed higher education (HE) choices that best suit their aspirations and abilities and maximise their opportunity for success, and to benefit our members through the provision of shared services. UCAS provides information and advice, course information, entry requirements, and application services to around 650,000 applicants to over 350 UK higher education providers each year. These applicants make over 2 million applications to HE courses. Our services support applications for full-time HNCs, HNDs and foundation degrees as well as undergraduate and some postgraduate degrees.

UCAS welcomes the opportunity to respond to this consultation on the proposed changes to the operation of student number controls in England for the 2014/15 academic year. Our response will focus on each of the specific sections of the consultation document.

Section one: Student number control flexibility

Question 1: Do you agree with our proposed approach to offering ongoing flexibility and some increase to the student number control allocation for those institutions demonstrating strong demand?

Whilst it would not be appropriate for UCAS to comment on the manner in which student numbers are allocated to institutions we are supportive of measures which serve to increase student choice.

We have a number of observations to make in relation to these proposals. Firstly, the mechanism proposed by HEFCE seems to base any growth of an institution's core number allocation and flexibility range on an institution's total recruitment, as opposed to their recruitment of applicants that fall into that particular category. This means that institutions could benefit from an increase in their core number allocation through the recruitment of learners that are ABB+ or equivalent. This has the potential to disproportionately benefit some institutions.

UCAS welcomes the mechanisms HEFCE has proposed in order to minimise the risk of year-on-year volatility by protecting institutions against any one-off changes in demand. However, HEFCE should consider how it views anticipated declines in demand over a short to medium term. If an institution wishes to enhance the academic quality of its intake by raising their entry requirements, it is possible that they may see a short to medium term reduction in applications. This has the potential to cause institutions to be cautious in relation to future strategic changes.

Timing to information regarding numbers allocation from HEFCE to institutions

UCAS is concerned regarding the timing of the announcement of any change in an institution's number allocation. For 2013/14 HEFCE funded institutions were made aware of

their provisional student number allocation on 18 January and these allocations were subject to appeal. Institutions were made aware of their final allocation on 18 March.

A number of attendees at the HEFCE run consultation events commented that the timing of these announcements was not satisfactory and makes long-term strategic planning difficult. UCAS is concerned that the increased flexibility in numbers and the timing of these allocations may create issues for institutions. For example, if an institution has not recruited to its allocated number in a previous cycle, it may act in an overly cautious manner in the following cycle due to a lack of clarity over their core allocation. Equally, an institution may over recruit with the understanding that they are to be given additional places from HEFCE as a result of their previous recruitment and their additional allocation not being in line with their expectations.

UCAS is of the belief that HEFCE should explore the possibility of providing an indication of an institution's allocation prior to January. Institutions report their previous cycle's recruitment to a number of organisations, such as the Student Loans Company, prior to this date and this information could form the basis of an interim indication of number allocation.

Section two: Exempting certain combinations of qualification types from student number controls

UCAS welcomes the introduction of applicants with a mixed profile of qualifications into the HEFCE student number control exemptions criteria. Intelligence from schools and colleges cites the lack of mixed profiles as an issue in relation to this policy and has led to questions regarding fairness. However, we also recognise that the introduction of mixed profiles of qualifications into the exemption list is likely to lead to an increase in resource requirements for institutions when assessing an application and their own recruitment targets.

The UCAS End of Cycle Report 2012¹ noted that 4.7% of the 18 year old population were accepted holding BTEC qualifications. About half of this increase has been for applicants holding combinations of A level and BTEC qualifications. This trend is likely to be supported due to the proposals made by HEFCE that will allow HEIs greater freedom to accept these learners.

Recently released data from the Department for Education² suggests that the number of students taking purely academic qualifications has declined from 70% in 2008 to 51% in 2012. This trend may continue if students increasingly opt to study vocational qualifications or a mixture of academic and vocational, following the introduction of revised A levels that are designed to be more demanding, and the decoupling of the AS from the full A level.

If this trend continues, any increase in participation in HE (and sustaining and increasing widening participation) will have to be supported by the increased progression of vocational qualifications, either in isolation or as part of a mixed profile. Therefore UCAS welcomes any

¹ <http://www.ucas.com/sites/default/files/ucas-end-of-cycle-report-2012.pdf>

² Department for Education - Government proposals to reform vocational qualifications for 16-19 year olds
<http://www.education.gov.uk/childrenandyoungpeople/youngpeople/qandlearning/otherqualifications/a00222542/vocational-qualifications-16-19-year-olds>

mechanisms that HEFCE introduce that could enhance the progression of these learners, such as introducing combinations of qualifications into the exemption list.

In our response to the Department for Education consultation regarding Government proposals to reform vocational qualifications for 16-19 year olds³ we detailed the profile of applicants holding BTEC qualifications that enter higher education (often holding that particular qualification in conjunction with A levels). These learners are more likely to be from areas of low participation in HE (Polar2 quintiles 1 and 2) than applicants holding A levels and are more likely to apply from a further education or sixth form college than from a state, grammar or independent school. Therefore the introduction of mixed profiles of qualifications into the HEFCE exemption list, such as A levels and BTECs, could potentially support the progression of these learners.

There is also the potential that we may see a greater acceptance rate of these learners in higher tariff institutions, due to the greater freedom offered to institutions by including mixed profiles of qualifications in the exemption list. Generally higher tariff institutions will have a smaller proportion of their total intake fall within their core allocation. Under the present arrangement applicants holding mixed profiles, such as A levels and BTECs, or A level and a Pre-U certificate, would fall within an institution's core allocation and therefore be competing for a relatively small number of places. The liberalisation of number control arrangements will provide these institutions with greater opportunities to accept these learners. As UCAS detailed in our response to the Department for Education consultation on the reform of vocational qualifications for 16-19 year olds⁴ and our End of Cycle report 2012, 0.3% of 18 year olds accepted into high Tariff institutions in 2012 were holding BTEC qualifications, either in isolation or as part of a combination.

We also note that EU qualifications are not included within the HEFCE exemptions list and understand the reasons given as to why HEFCE has not sought to include these. This will inevitably create challenges for institutions that are attempting to balance fair access for home students and make contextual offers, with the recruitment of high quality applicants from within the EU. Although HEFCE has continuously stated that institutions should have sufficient places allocated to them to support both fair access and EU recruitment, UCAS believes that this should be continuously monitored. This is important to ensure that institutions are able to sufficiently support the progression of both of these learner cohorts, as this may be particularly challenging for highly selective institutions that have a relatively small number of core places allocated to them. UCAS recommends that HEFCE engage with SPA regarding best practice in relation to the recruitment of these learners.

Question 9: We have set out proposed criteria in this section for exempting a limited number of the most common combinations of qualification types from student number controls. Do have any comments on the proposed criteria? Do you have any comments on the approach in general?

UCAS believes that HEFCE should give consideration to including the Welsh Baccalaureate Advanced Diploma into the exemptions list. Previously the justification for not including the

³ <http://www.ucas.com/sites/default/files/dfe-consultation-vocational-quals-may-2013.pdf>

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Welsh Baccalaureate was that it is a combination of qualifications, and that the Welsh Baccalaureate Advanced Diploma Core was not graded. However, following the Welsh Government's Review of 14-19 Qualifications in Wales, it will now be graded from first teaching in September 2013. The qualification would now fulfil the majority of the principles for setting equivalences set out in the consultation document and therefore should be considered for inclusion. The inclusion of the Welsh Baccalaureate would also potentially enhance student choice for Welsh learners.

Looking to the future it will also be important that the exemptions policy takes account of qualifications reforms taking place in different parts of the UK.

The current methodology and approach for exempting qualifications, draws upon the UCAS Tariff. In 2012 UCAS concluded its Qualifications Information Review (QIR) which made a number of recommendations for improving the information available to students, advisers and HE providers to support fair and transparent admissions to HE. This included the development of a new, simpler points system to replace the Tariff.

The new Tariff methodology that we are developing will encompass a wider range of qualifications than the current version, improving coverage and the ability to compare qualifications.

It may be useful to consider what impacts this could have on the exemption of qualifications from student number controls, and whether the methodology could help support the inclusion of other qualifications combinations. Consistency in approach would be helpful for students and advisers, as well as for the HE sector. We would be happy to discuss this further with HEFCE.

Question 12: Do you consider that there are any equality considerations we have not taken into account? Does the proposed approach require an institution either to disadvantage a particular group of students, or prevent steps being taken to assist a particular group? If so, which group(s), and how may the approach be modified to reduce these effects?

UCAS provides information to applicants and advisers⁵ in relation to student number controls, as we feel it is important that these audiences are aware of student number controls, and when it could potentially be a consideration in relation to an applicant.

The subject is a complex one and UCAS has strived to present the information on our website as simply as possible. However, some still have difficulty in understanding this policy and how it impacts on applicants.

The introduction of grade combinations is likely to make this information more complex for applicants and advisers, and more difficult for these audiences to identify which applicants may be in a position where student number controls may become an additional

⁵ Information for Advisers

<http://www.ucas.com/how-it-all-works/advisers-and-referees/understanding-student-number-controls>

Information for Applicants

<http://www.ucas.com/how-it-all-works/undergraduate/understanding-student-number-controls>

consideration in relation to them. UCAS notes that HEFCE provides information to students regarding student number controls on their website. This information will need to be reviewed in light of these proposed changes, and presented in a more clear and concise manner that addresses the added complexity.

UCAS will continue to provide clear and concise information to these audiences in relation to this policy. However, we would be keen to work with HEFCE in order to ensure that we have consistent messages and terminology in order to avoid any unnecessary confusion.