

UCAS response:

A new approach to regulating equality of opportunity in English higher education by the Office for Students (OfS)

Introduction to UCAS

UCAS, the Universities and Colleges Admissions Service, is an independent charity, and the UK's shared admissions service for post-secondary education. This service spans undergraduate, postgraduate, technical, and apprenticeship pathways, with the undergraduate service alone supporting over 700,000 students a year from over 200 countries and territories to access UK higher education (HE). In addition, we are a student-centric organisation with one of the UK's largest student audiences – ucas.com receives 30 million unique visits per year and more than 1.5m people engage with UCAS each year, exploring HE, apprenticeships, and early careers.

Summary of key points

Supporting disadvantaged students is at the heart of UCAS' charitable objects – we are committed to helping students from all backgrounds in progressing into and through education, and we recognise the key role we play in supporting widening access and participation (WP). Most recently, UCAS has significantly invested in this area through the launch of the Fair Access Programme (see below) to build on our existing work and add additional value to the work already underway across the sector. In addition, UCAS recognises it is a key enabler of the lifelong loan entitlement (LLE) and is working cross-sector to realise its potential for WP.

We are therefore fully aligned to the Office for Students' (OfS) aim of ensuring that 'every student, whatever their background, has a fulfilling experience of HE that enriches their lives and careers'.

In the following response, we highlight a series of areas we recommend the OfS takes into account in the development of its new approach to regulating equality of opportunity, in addition to articulating how UCAS can support the sector. We look forward to engaging with the OfS in the implementation of the new WP process, and view ourselves a key partner in this.

Summary of key points:

- **The timeframe for APPs must reflect the external landscape:** We forecast one million applicants by 2026, compared to just over 700,000 currently. Without sector-wide action, there is real potential for this capacity squeeze and increased competition to create a new equality of opportunity crisis, reversing fifteen years of progress. In the immediate term, the cost-of-living crisis also poses a major risk to WP.
- **UCAS data and insight can inform sector and provider level risks to equality of opportunity:** UCAS welcomes the principle of balancing sector-wide challenges in WP with local priorities and will wish to input into the national Equality of Opportunity Risk Register (EORR) to cover the pre-applicant and applicant phase of the student journey.
- **Multidimensional measures of disadvantage provide a truer sense of equality of opportunity:** UCAS endorses the Multiple Equality Measure (MEM) – it is unique in that

it enables a multidimensional view of equality during the application phase of the student journey, pre-empting gaps in entry to HE – we would wish to see this referenced within the EORR as well as providers’ individual registers.

- **UCAS is the right channel for sharing ‘accessible summaries’ of APPs with students:** UCAS is the single biggest gateway to post-18 opportunities, with over 30 million unique visits a year. We are experts in communicating complex information to students – ‘accessible summaries’ of APPs must sit alongside the broader content we present about choices and support on ucas.com.
- **UCAS can help the sector to embrace a razor-sharp focus on evaluation:** Both our [Outreach Evaluator \(STROBE\)](#) and [Modernised Contextual Data Service \(MCDS\)](#) tools are available to universities and colleges to enable effective evaluation.
- **UCAS bridges the gap between schools and HE providers:** UCAS’ [Where Next? report](#) on what influences the choices school leavers make, highlights the benefits of universities and colleges engaging with primary-age education to raise aspiration. Through targeted interventions, UCAS evidence also advocates for subject-focused outreach to prevent students from inadvertently limiting their onward progression.
- **UCAS is investing further in its support for disadvantaged students.** Through our Fair Access Programme, UCAS is delivering and developing initiatives to add additional value in widening access and participation. We’d welcome discussions with the OfS about how the Fair Access Programme can be core to the sector’s approach to tackling equality of opportunity.

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What is UCAS' Fair Access Programme and how does it support WP?

Significant progress has been made in widening access and participation in the past fifteen years, with an increase of over 30,000 more students from the most disadvantaged areas (POLAR4 Q1) applying in 2021 (a percentage increase of 66% applying since 2007), resulting in those students now being twice as likely to progress to higher education (HE). However, the 'journey to a million' undergraduate applicants in 2026 – and increased demand across the full range of post-secondary pathways – presents further challenges, as increased competition risks disadvantaged students losing out.

It is in this context that UCAS launched its Fair Access Programme in 2021, with the aim of building on the valuable work already underway across the sector.

Informed by national consultation, where we gained the views of over 100 stakeholders, the UCAS Fair Access Programme aims to support access for all students and:

- transform the sector's understanding of students through new questions, data and insight;
- connect HE and outreach providers to the hardest to reach students, earlier;
- help the sector understand what works in WP;
- help bring schools and universities closer together;
- remove barriers and inspire students.

What the Fair Access Programme has achieved so far

Development of the Outreach Connection Service – Aiming to raise awareness of the full range of outreach and support available, this new service will help schools and students navigate and connect to the opportunities offered by HE providers and third-sector organisations. Not only will this significantly enhance our understanding of how students engage with such opportunities and their subsequent progression, it will also inform sector-wide evaluation and impact measurement. After extensive research and scoping, we are aiming to launch the service for the 2023 application cycle, creating a 'single source of truth' about the trusted outreach opportunities available to all UCAS-registered centres in the UK.

Continued reform of the application service – For 2023 entry, UCAS introduced seven new questions into the application so a broader range of students can easily flag their circumstances and access the right support for their needs. This new data will also transform our knowledge about the progression of these students – to be explored in future 'Next Steps' reports. As of the October 15 deadline, UCAS analysis shows that (98%) have responded to at least one of these new questions while one in five (18%) positively answered at least one question, sharing circumstances such as receiving free school meals (11%), having caring responsibilities (4%), having a parent in the armed forces (2.8%) or being estranged (1%).

Also in 2023, UCAS is planning to release the grades-on-entry tool, providing visibility of the A Level and BTEC results students hold at the point of entry to HE. We continue to work with Scottish universities and colleges to understand the most helpful ways of capturing the nuances of SQA Highers and Advanced Highers. While this data is already available via the Adviser Portal, this new development will ensure applicants who do not have access to an adviser can also benefit, and trigger curiosity in students to reflect upon options that might have appeared out-of-reach.

Fully personalised student journeys – By understanding the needs of specific groups of disadvantaged and under-represented students across their full decision-making journey, we can help raise aspirations and build confidence. UCAS aims to present the information and advice students need at the point of optimum impact to support informed decision making across the full range of post-secondary pathways. To ensure students with individual needs feel prepared at each stage of their journey, we've worked with expert organisations to bring together practical tips and useful resources for those who are advising students about their next steps in the [adviser toolkits](#).

Data and insights – Utilising our data science capabilities, we publish [analysis and insight reports](#). Our 'Where Next?' and 'Next Steps' series offer fresh insights into the potential barriers students face when navigating their post-secondary destinations, and aid policy considerations on how they can be overcome. Our [Outreach Evaluator](#) data tool supports the evaluation of widening access and participation activities by matching individuals' data to the UCAS database to trace their progress. At each stage, this data is compared with an appropriate control group, and a report produced on any significant change, offering robust statistical evidence on the impact of engagement activities for HE and outreach providers.

Targeting support in schools and colleges – We are working directly with the lowest progression schools and colleges across the UK to deliver bespoke professional development and resources designed to support students to explore their options and make high quality applications that are right for them. Our targeted Further Education College Programme was launched in October 2022 in the North East, Hull and East Yorkshire.

UCAS will release updates on the progress of these ambitious plans in future 'Next Steps' reports.

UCAS' response to the Office for Students' consultation on a new approach to regulating equality of opportunity in English higher education

To what extent do you agree with our proposals relating to risks to equality of opportunity?

UCAS supports the proposal to balance the need for addressing sector-wide challenges in WP with local priorities, which are a feature of a group of providers', or an individual provider's, activities, and circumstances. For example, in UCAS' research report, [What happened to the COVID cohort?](#), we identified that, overall, the equality challenge is greater for higher tariff providers across most measures, including POLAR, free school meals (FSM) and ethnicity. However, the gender gap is widest at lower tariff providers, and medium tariff providers see the most notable difference in geographical inequality by region.

UCAS is well placed, through its insight and data science capability, to inform the identification of risks to equality of opportunity, both at sector and provider level. We are uniquely placed to share risks that persist prior to entry to HE, both in terms of applicants (i.e., those who apply), but also, critically, pre-applicants (i.e., those who are yet to embark on their post-secondary education journey). Given the recognition that gaps in early education are indicative of later challenges, this part of the puzzle will be critical to both identifying the most sizeable risks and developing successful mitigations.

That's why we'd wish to ensure that our insight is fed into both the OfS' sector-level Equality of Opportunity Risk Register (EORR) and individual providers' APPs.

It's also worth noting that in some instances, coordinated sector-wide action may be the most effective route for tackling a risk to equality of opportunity. For example, the [NNECL Quality Mark](#) – a developmental accreditation process for universities and colleges to demonstrate their support for the inclusion and success of care-experienced students, the [Stand Alone Pledge](#) – a public commitment to support for estranged students, or the [Disabled Student Commitment](#) – which asks organisations to do more by focusing on how they can improve the disabled student experience

The following illustrates how UCAS can support the identification and mitigation of risks to equality of opportunity both at sector and provider level.

Sector level data

- **In-cycle and post-cycle data releases:** UCAS releases around eight million data points each cycle, playing a vital role in informing the sector's understanding of WP in HE. This includes annual and trend data including WP characteristics such as POLAR4 and IMD

quintiles, disability, ethnic group, school type, A level, BTEC, and SQA qualification attainment, and UK region of domicile.

- **Entry rate data:** Our access to verified FSM data from the NPD linked to our own application data means we can calculate entry rate ratios, thus highlighting the size of the equality gap relative to the population. Access to verified data for care leavers would allow us to do similarly for this cohort, along with other groups where verified data may be available.
- **Policy reports:** Over the past 18 months, UCAS has released high-impact reports that shine a light on pertinent issues in education and skills, many of which identify sector-level risks to equality of opportunity - including:
 - The annual admission of 70 more of the most disadvantaged English 18 year old pupils to each higher tariff provider could all but eliminate the equality gap highlighted through UCAS' multiple equality measure (MEM) in just a decade. In 2020, each higher tariff provider accepted an average of 75 students from such backgrounds. Based on this current rate of progress, the gap would not be eliminated until 2352 – taking 332 years ([What happened to the COVID cohort?](#))
 - Regional gaps in entry persist, with 49.1% of London-based 18 year olds entering HE, compared to 32.4% of those from the South West ([What happened to the COVID cohort?](#))
 - One in three students understand that HE is an option for them at primary school. However, advantaged students are 1.4 times more likely to think about HE in primary school than their disadvantaged peers ([Where Next? What influences the choices school leavers make?](#))
 - Men remain an untapped source of nurses. The gender gap is stark, with women more than nine times more likely to choose and be placed on nursing courses – the application gap rises to 57 times for children's nursing ([Next steps: Who are the 'future nurses'?](#))
 - Despite a 450% rise in applicants sharing a mental health condition, half (49%) still choose not to share. While some groups are over-represented (women, LGBT+, care-experienced, disadvantaged, mature), others appear to be under-reporting (men, some ethnic groups, and those applying for medicine and dentistry courses) meaning some students who may benefit from support risk delayed or limited access. ([Starting the conversation: UCAS report on student mental health](#))
 - Disabled applicants are 23% more likely to defer entry to HE due to delays with the support or adjustments they need, indicating earlier engagement is needed with decision making, and an extension of the DWP's Access to Work Passport scheme to ease the transition into HE. ([Next Steps: What is the experience of disabled students in education?](#))

Provider level data

- **Regular data supplies:** UCAS provides universities and colleges with their underlying data from EXACT (our commissioned analytical data service) under an internal use EXACT licence at five cycle points. UCAS has worked closely with the OfS to ensure the datasets support completion of the annual transparency return. Such in-cycle data also

enables providers to pre-empt areas that need investigation and possible intervention, without being too late in the cycle to make a difference.

- **Equality reports:** Each year, UCAS publishes equality reports, covering applications, offers, and placed applicants by sex, area background, and ethnic group for over 130 larger universities. UCAS' analysis places applicant numbers, and acceptance and offer rates, into context to facilitate accurate interpretation. Several providers have used the data to conduct self-assessments of their practices and identify areas where further investigation may be required. We've also explored using a modelling approach to improve reporting of relationships between applicant characteristics and offer rates. This approach, if implemented, would control for a broader range of factors affecting the likelihood of receiving an offer.
- **Brand new WP data about their applicants:** The 2023 entry cycle presents a significant advancement in the breadth of equality information shared with providers, with seven new questions added to the application to identify: students estranged from their parents; students with caring responsibilities; students with parenting responsibilities; refugees, asylum seekers and those with limited leave to remain in the UK; students from UK Armed Forces families; UK Armed Forces veterans and Service leavers; and a self-declared free school meals question.

Intersectionality and new data developments

As part of our work to better identify risks to equality of opportunity, UCAS created its Multiple Equalities Measure (MEM) in 2015 – a framework for combining the effects of many of the measures currently used in the analysis of equality in HE (e.g. FSM status, school type, IMD) into a single value. This approach avoids focusing on a single measure or metric such as POLAR, which can create blind spots or lead to misclassification. UCAS recommends that the MEM is adopted as the default mechanism for measuring participation to provide a true sense of progress – we would, therefore, wish to see this referenced within the EORR as well as providers' individual registers.

UCAS acknowledges the OfS has used a similar statistical approach to develop its Associations between characteristics of students' (ABCS) measure. This is in addition to the creation of TUNDRA as a new area-based measure of measure of HE participation. As such, we would welcome further dialogue about how such measures can be used in a manner that gives clarity to the sector and supports real improvements in WP. For example, to what extent can a three-dimensional view be adopted during the pre-application and application phases of the student journey.

A key focus of the OfS will be evidence-based strategies for tackling drop-out rates. UCAS supports students in making the right choice for them, maximising the likelihood of their continuation and success once enrolled. We are also exploring how our data, linked to third parties, can provide an indicator as to likely level of support need once enrolled. We'd welcome discussion with the OfS about how we might work together on this initiative.

To what extent do you agree with our proposals relating to a four-year plan duration and publication of information about a provider's delivery of a plan?

Notwithstanding the additional burden this might create within providers, UCAS is supportive of the proposed four-year timeframe, given the need for Access and Participation Plans (APPs) to reflect a dynamic external environment. For example, UCAS notes two major risks to equality of opportunity over the next four years:

1. Unprecedented demand for education and training – the 'journey to a million' applicants
2. The cost-of-living crisis

The 'journey to a million' applicants

Demand for post-secondary education and training has risen in recent years. On Results Day this year, we saw [a near record number of 18-year-olds](#) from the UK on their way to university and college, and new data shows 1,200 students also used UCAS to search and apply for live apprenticeship vacancies (offered alongside undergraduate opportunities in Clearing) on this single day – a 6% uplift from 1,130 last year.

This rising demand is set to continue. We forecast one million applicants by 2026 compared to the just over 700,000 currently. This increase is a result of a rise in the 18 year old population and higher demand from this cohorts, and more international students choosing the UK. It will be critical to plan for this increase and ensure capacity can keep up. The risk of not doing so is that disadvantaged students get squeezed out, reversing fifteen years of progress.

Those from disadvantaged backgrounds are much more likely to be at the lower end of the attainment spectrum, with 12.5% of 18 year old POLAR4 Q1 (the most disadvantaged) applicants achieving grades below CCC at A level in 2021, double that of their advantaged peers in POLAR4 Q5. Without sector wide action, there is real potential for this capacity squeeze and increased competition to have a greater impact on disadvantaged students, creating a new equality of opportunity crisis.

Equally, in a more competitive environment, we will see less flexibility for 'near miss' students (i.e., those who do not meet their offer conditions at Confirmation and Clearing) – it is at this stage in the admissions cycle when universities and colleges often prioritise WP applicants, putting this cohort, once again, at greater risk.

The cost-of-living crisis

In brief, since the pandemic, UCAS has noted an increase in applicants' alertness to cost, along with an increased desire to gain part-time employment alongside their studies (which has accelerated in line with cost-of-living concerns). Last cycle, 62% of students responding to UCAS'

2021 placed applicants survey said that the cost of living at university or college was one of the biggest barriers to entering HE. This trend has continued, with 2022 applicants now telling us that, as a direct result of the increased cost of living, they are considering getting a part-time job (69%), applying for financial support (42%), and asking for additional support from their family or carer (39%). This is something we'll be exploring further in our End of Cycle surveys, with insight likely in the coming months.

We know at present that certain groups are more financially sensitive, particularly mature students and those from disadvantaged backgrounds, and we are concerned this may become heightened as the cost-of-living challenges increase. We also know that it is immediate costs – as opposed to the longer-term costs – that cause students greater concern. Consequently, in our response to the [HE policy statement consultation](#), UCAS recommended that consideration be given to a national progression fund to support students preparing for enrolment. This could be delivered directly to students via a voucher scheme or as an addition to the [16-19 Bursary Fund](#).

Incentivising long-term interventions with maximum impact

Another point relevant to the timeframe set for reviewing APPs is the need to avoid disincentivising long-term initiatives – with the four-year window creating the risk that the focus of APPs could be on secondary education. [UCAS research](#) illustrates the importance of primary-school age interventions – which inevitably have long lead-in times – to demonstrate impact through the lens of access to HE. UCAS would therefore advocate for recognition of the benefits of well-evidenced long-term initiatives, for which both the risk and (potential) reward are greater.

To what extent do you agree with our proposals related to the format and content of an APP?

Communication of 'accessible summaries'

Whilst UCAS welcomes the intention to create transparency for students by enabling visibility of APPs, our view is that the delivery mechanism needs further thought.

We note that one of the proposed objectives of the 'accessible summary' is to engage prospective students. UCAS is the largest education website in the UK and engages with more than 1.5 million prospective students each year to provide careers advice on the full range of post-secondary choices, including apprenticeships, technical education, lifelong learning, and flexible and part-time options. This extensive reach and expertise in student-facing communication means we are well placed to act as the channel for sharing APP summaries with students, with our newly-launched provider pages, which receive more than two million unique views since launch 2.5 months ago, acting as the platform.

Format and content of 'accessible summaries'

The broad-brush content of APP summaries, as proposed within the consultation, is unlikely to engage prospective students. UCAS research consistently shows that it is only by personalising content to students' individual circumstances it will impact their decision-making. For example, in UCAS' recent report [Next Steps: What is the experience of disabled students in education?](#), we recommended an 'at-a-glance' indication of support for disabled students is included on each university and college page in UCAS search.

Furthermore, the level of detail proposed in the APP summaries (e.g., availability of financial support), may not always be appropriate since this information is likely to be refreshed annually. In a scenario whereby plans are refreshed every four years, there is a risk that prospective students may access outdated information. Moreover, some content will already be displayed to students (and updated annually) via the UCAS Hub and search tool (e.g., fee information).

UCAS' survey programme and network of advisory groups provides a ready-made channel for soliciting feedback from applicants, students, and advisers. We would be willing to work with the OfS to facilitate meaningful discussions about APP summaries via these channels to inform next steps.

To what extent do you agree with our proposal related to evaluation?

UCAS welcomes the OfS' focus on generating and disseminating new evidence about what works to improve WP – this can only be achieved through a razor-sharp focus on evaluation. UCAS works with the sector to support with the provision of data to facilitate the analysis of cohorts.

The Outreach Evaluator

The [Outreach Evaluator \(STROBE\)](#) is a service developed by UCAS in 2014. It supports the evaluation of WP activities by taking the personal data that has been supplied and matching it to the UCAS database to trace the progress of the individual. It therefore provides robust statistical evidence on the impacts of engagement activities for HE providers and charitable organisations.

The information provided relates to every stage of the HE admissions process, from application to acceptance, including the main cycle, EXTRA and Clearing. In addition, providers can access reports in-cycle, generating intelligence in real-time. For each stage the Outreach Evaluator compares the data supplied by an organisation with an appropriate control group, and reports on any significant change achieved. This provides insight into:

- specific segments, enabling evaluation of multiple interventions, or the use of a user-defined control group
- which HE providers, or groups of HE providers the groups of individuals have applied to

We would welcome discussions with the OfS regarding how we can make the Outreach Evaluator more widely available; for example, we have:

- developed a training module on the UCAS Professional Development Platform to support new users with utilising Outreach Evaluator outputs in their evaluation and impact evidence.

- worked with tracking services including EMWPREP and HEAT to scope developments to the Outreach Evaluator.
- offered the service free of charge to all UniConnect partnerships, to aid understanding of their impact and highlight the benefit of this service.

Long-term, we'd welcome discussion with the OfS about how the Outreach Evaluator could form a core part of the sector's approach to evaluation, adding value to the work of others such as TASO and HEAT.

Modernised Contextual Data Service

In addition, through our [Modernised Contextual Data Service \(MCDS\)](#) – providing applicant level data and insight into individual circumstances – universities and colleges can interrogate their data to evaluate the success of their admissions criteria in addressing risks to equality of opportunity.

Through the data collected via both services, UCAS can act as a vehicle for showcasing and evidencing evaluation via case studies and user cases. We will also join up with TASO to ensure that our evidence-base is fed into the wider discussion around what works in progression to HE. Finally, UCAS' forthcoming Outreach Connection Service is designed to enable nationwide visibility of outreach initiatives. Therefore, and by virtue of its coverage, it will offer the sector a new opportunity to better understand how students engage with outreach activities, shedding light on what works in WP.

To what extent do you agree with our proposals related to raising attainment in schools and collaboration?

The role of aspiration raising in WP

With commentators such as the Education Policy Institute (EPI) reporting how the pandemic has [further increased the attainment gap at earlier ages in education](#), UCAS welcomes the increased focus on raising pre-16 attainment. Our well-established relationships with more than 4,500 teachers and careers advisers across the UK mean we can play a critical role in helping to connect universities and colleges to schools.

UCAS' report [Where Next? What influences the choices school leavers make?](#) supports the OfS' encouragement for 'more impactful, strategic, enduring, mutually-beneficial partnerships with schools', as we highlight the importance of early aspiration raising. The report finds that more than three in four students first realise HE is an option for them before they start post-16 education, and one in three first realise this when they are within primary education. However, disadvantaged students tend to consider the prospect of HE later than their more advantaged peers, with 27% from POLAR4 Q1 (the most disadvantaged group) considering this in primary school, compared to 39% of those from Q5 (the most advantaged group) – reaffirming the

findings of UCAS' 2016 [Student Lens report](#), which emphasises the role of primary schools in shaping and broadening aspirations.

Through UCAS' Fair Access Programme (detailed above), and increased investment in information and advice across the UCAS estate, we are seeking to support earlier aspiration raising. One such example is the UCAS 'Outreach Connection Service', a new initiative we are co-developing with stakeholders, to catalogue and promote outreach opportunities. This service will be available across the UK, and present opportunities based upon WP characteristics and postcode. Initially, this will be made available to schools and colleges, acting as a low burden route to access outreach and to identify cold spots of intervention, and to support providers to work altruistically with students, helping them succeed academically, and progress onto the best route for them. Through our consultation with the OfS and Uni Connect partnerships, we are confident this service would complement the success of existing regional Uni Connect outreach hubs, which currently operate with varying levels of sophistication and resource.

The benefits of subject-specific outreach in early years of education

Within our [Where Next? report](#) on what influences the choices school leavers make, we note that one in five students report they could not study an HE subject that interested them because they did not have the relevant subjects for entry – with medicine the most commonly cited. This underlines the importance of ensuring pupils are aware of how the choices they make in school can affect their later options – with the HE sector well-placed to develop subject-specific outreach programmes.

Therefore, and as an extension to the OfS' proposal, UCAS recommends that providers undertake more targeted outreach work within primary schools and early secondary years with a focus, not just on attainment, but on broadening awareness of yet lesser-known subject areas, specifically those with 'fixed' pre-requisite qualifications for entry. The doctors, teachers, and nurses of tomorrow are planning their careers well in advance, but those preparing for less linear careers and/or unfamiliar professions – such as [economists](#) – risk being left behind.

For our part, UCAS continues to develop [tools](#), such as our Careers Quiz, that support pupils' understanding of how qualification and subject choices at GCSE/National 5 and post-16 may affect their post-secondary options.