



Department
for Education

Higher Education Policy Statement and Reform: Government Consultation Response

Equality Analysis

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Contents

The HE Reform Consultation and Government Response	1
Summary of impacts	1
Recruitment limits	2
Foundation years	3
Analysis of equality impacts by proposed measure	5
Measure 1: Recruitment Limits	5
Policy description	5
Measure 2: Foundation Years	9
Policy description	9

The HE Reform Consultation and Government Response

In February 2022, the government published a consultation setting out a number of proposals to further reform the way the Higher Education (HE) sector operates and is regulated. These proposals considered recommendations put forward by the Independent Panel to the Review of Post-18 Education and Funding, chaired by Sir Philip Augar.

The consultation closed on 6th May 2022, with a total of 318 responses received from a wide range of interested parties, including Further and Higher Education providers, awarding bodies and members of the public. The responses were analysed in a report authored by a third party, York Consulting. This analysis has been published alongside the formal consultation response.¹

This equality analysis considers the impact of the following two key reform measures on people with particular protected characteristics:

- i. **Recruitment limits:** we will issue statutory guidance to the Office for Students, setting out that it should impose recruitment limits where provision is found to be in breach of registration condition B3, which requires Office for Students-registered providers to deliver positive outcomes for students on HE courses.
- ii. **Reducing the maximum fee and loan limits for foundation years in classroom-based subjects** (such as social sciences and business studies) which cost less to deliver and in which there has been rapid and disproportionate growth, whilst retaining the maximum fee limit of £9,250 for foundation years in all other subjects.

Summary of impacts

Under the Equality Act 2010, the Department for Education (DfE), as a public authority, is legally obliged to give due regard to equality issues when making policy decisions – this is known as the Public Sector Equality Duty (PSED).

Overall, our assessment is that the decision to issue guidance to the Office for Students that it should impose recruitment limits, and the lowering of fees for foundation year students, will largely have a positive or neutral impact on groups sharing particular protected characteristics (although there is potentially a risk of negative impacts on some protected groups in certain cases).

¹ [Higher education reform consultation analysis: research report - GOV.UK \(publishing.service.gov.uk\)](https://www.gov.uk/publishing.service.gov.uk)

Recruitment limits

The Office for Students' imposition of recruitment limits is unlikely to directly impact most students since we expect the majority of HE provision to comply with registration condition B3. However, we expect recruitment limits to have a broadly positive effect on HE, by preventing the growth of provision with poor outcomes, thus promoting the growth of provision that does have good outcomes. We expect all students to benefit from this.

Pre-implementation, all students irrespective of their protected characteristics, currently enrolled on provision that is not meeting condition B3 may benefit from the statutory guidance if this encourages providers to proactively improve the quality of this provision. Once the Office for Students starts to impose recruitment limits, the resultant impacts will depend on the Office for Students' decisions about: whether to impose a recruitment limit; on the detail of the recruitment limit imposed; and, on the actions of students who would otherwise have studied provision subject to recruitment limits.

Our analysis shows that recruitment limits would have no impact on the need to eliminate discrimination, victimisation and harassment or foster good relations. However, there could be some impact on the need to advance equality of opportunity.

Our analysis of the latest available data on student outcomes published by the Office for Students indicates that recruitment limits will be more likely to apply to providers with higher-than-average proportions of students with some protected characteristics, such as female, black, and mature students.

The policy aims to prevent the growth of provision which is not delivering positive outcomes for students. We expect students to benefit from recruitment limits if they are diverted to other HE provision where recruitment limits have not been applied, or other educational pathways, which offer better outcomes. However, we recognise that for some students, their choice of alternative opportunities could be more limited due to personal circumstances restricting their flexibility over courses and providers. Additionally, for some students, entering HE with generally poor student outcomes could still have led to better outcomes than if they had not entered HE at all.

Whilst recruitment limits could potentially affect the need to advance equality of opportunity for people with some protected characteristics, our assessment is that this potential risk, and scale of the risk if it were to crystallise, is outweighed by the need to prevent the growth of provision with poor outcomes.

Mitigating impacts

As set out in the previous section, our expectation is that recruitment limits will have a broadly positive impact on all students. The precise impact of recruitment limits on students with particular protected characteristics will be influenced by the Office for Students' decisions on the specific circumstances in which recruitment limits for breaches of condition B3 might apply. In reaching such decisions, the Office for Students will consider

contextual information about the provider, including its student intake and their characteristics. The Office for Students must also consider whether a recruitment limit is proportionate and more broadly, in performing its functions, the Office for Students is required to comply with the PSED and its general duties, including the duty to have regard to the need to promote equality of opportunity in connection with access to and participation in HE.

Foundation years

Proposals to reduce the fee and loan limits for classroom-based foundation year subjects would have a positive impact on students who are female, older, and white as they tend to be overrepresented in these subjects compared to foundation years in all other subjects. Although not a protected characteristic for the purposes of the Equality Act, students from disadvantaged backgrounds are also expected to be positively impacted.

These student groups are more likely to be cost sensitive and debt averse, which means they are more likely to be discouraged from taking up higher level learning opportunities if they perceive the cost of study to be too high². Reducing tuition fees for classroom-based subjects will therefore lower the financial barriers to participation faced by people with these protected characteristics, leading to a lower financial burden on students taking up these courses which cost less to deliver.

While we have not identified disproportionate negative impacts on students who share particular protected characteristics, we envisage that this policy could lead to providers scaling back or withdrawing the foundation years courses they offer. However, we cannot say for certain how providers (or students) will respond to these changes. If any negative impacts do arise, we consider them justified by our primary objectives of the policy: to stem the growth of foundation years provision that does not represent good value for money for students, in subjects where an additional year of study is unlikely to be required, whilst simultaneously ensuring that higher cost and strategically important provision is protected and that foundation year provision overall is used for the benefit of students to promote access to HE.

Overall, we do not consider that these proposals would impact on the need to eliminate discrimination. The proposals would be likely to advance equality of opportunity by reducing the fee and loan limits for classroom-based subjects, helping to ensure students are charged a fairer price for lower-cost provision that may not require an additional year

² There is an extensive literature on debt aversion. This can be found at: [Influence of finance on higher education decision-making \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/612348/influence-of-finance-on-higher-education-decision-making.pdf) [Impact of the student finance system on participation, experience and outcomes of disadvantaged young people \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/612349/impact-of-the-student-finance-system-on-participation-experience-and-outcomes-of-disadvantaged-young-people.pdf)

of study. The proposals are not expected to have any impact on the need to foster good relations between persons who share protected characteristics and those who do not.

Mitigating impacts

If this policy achieves its objective and leads to providers scaling back or withdrawing their classroom-based foundation year provision, we believe that there are alternatives to foundation years that offer students suitable alternative routes to HE. If this policy does not lead to a reduction in classroom-based provision but does lead to a reduction in the quality of this provision, then we still believe these routes offer suitable alternatives for students. For example:

- **Higher Technical Qualifications (HTQs) and other Level 4 and 5 courses** – The initial rollout of new HTQs will be completed from academic year 2025/26. HTQs and other Level 4/5 qualifications can promote entry into skilled employment or can be topped up to degree-level with further study, either on completion or later in life.
- **Access to HE Diplomas** – AHEs are stand-alone Level 3 qualifications, delivered in a further education setting. They are similar to foundation years in that they seek to prepare a student for a specific HE course. They are widely available in classroom-based subject areas.
- **Other foundation years** – For students who think a foundation year is the most appropriate post-18 route for them, other subject choices will be available. We expect a wide range of classroom-based provision to be retained, with the lower £5,760 fee cap. All other foundation years will retain their current fee and loan limits, so we do not expect the scale of this provision to significantly change.
- **A-Levels** – Prospective students who do not meet the entry requirements for their chosen degree course could take or re-take the A Levels they need and then apply.

We believe these alternatives offer sufficient options for students who may be displaced by the reduction or withdrawal of some foundation year provision. Many of these options are also available at lower cost to students than foundation years. However, we will keep the impact of this policy under review through monitoring foundation year provision, and student participation rates.

Analysis of equality impacts by proposed measure

Measure 1: Recruitment Limits

Policy description

The government wants to prevent the growth of HE provision which does not deliver the high-quality employment prospects and the long-term economic returns students should expect. Respondents to the consultation highlighted the Office for Students' approach to regulating quality and standards as the route through which provision delivering poor outcomes should be identified and addressed.

We will issue statutory guidance to the Office for Students, setting out that it should impose recruitment limits where provision is found to be in breach of registration condition B3, which requires Office for Students-registered providers to deliver positive outcomes for students on HE courses.

In simple terms, condition B3 sets minimum thresholds for proportions of students who continue from the first year into second year, complete their degree, and go on to professional or managerial employment or further study within 15 months of graduation. Provision below these thresholds may be investigated by the Office for Students, who will consider broader contextual information before reaching a decision. More detail on how the Office for Students ensures provision is meeting condition B3 can be found in the Office for Students' document ['How we regulate quality and standards'](#).

If B3 has been breached, limits may be imposed on the number of students which can be recruited to this provision. This would mean that some provision which does not deliver positive student outcomes may be subject to a recruitment limit. This would aim to limit the number of students who can be recruited onto that provision, until the Office for Students is content that its quality concerns have been addressed.

We anticipate that such recruitment limits would be set as a specific condition of registration, possibly in addition to other Office for Students measures, and would be enforced using the Office for Students' existing powers. This will build on and reinforce the work the Office for Students has already done over the last two years to strengthen its quality and standards regime.

Ultimately, if a provider fails to improve student outcomes, then the Office for Students can consider a range of interventions, including specific ongoing registration conditions, a monetary penalty (fine) and/or suspension or deregistration of a provider.

The Office for Students is expecting to publish the outcomes of the first B3 investigations by summer 2023. The Government will work with the Office for Students to ensure they can use recruitment limits in relation to the outcomes of these and subsequent investigations. As highlighted within the Lifelong Loan Entitlement consultation, the Office for Students plans to begin engaging with the sector in summer 2023 on developing student

outcome measures for modular provision. We will ask the Office for Students to consider recruitment limits as part of this engagement.

Using protected characteristics data to understand which groups may be particularly impacted

Using provider metric data and the Office for Students' minimum numerical thresholds for B3 metrics³, in conjunction with data on protected characteristics⁴, we have analysed the proportion of existing undergraduate students⁵ with particular protected characteristics. The analysis disaggregates undergraduate students into those that are currently attending provision that falls below minimum numerical thresholds for one or more of the B3 metrics and compares these with the overall undergraduate student population.

We assume that the composition of the student population is unlikely to change significantly over the next few years. As such, we believe that analysis of the expected equality impact based on the characteristics of current student cohorts serves as a good approximation of the potential impacts on future student cohorts. It is likely that the impact of recruitment limits on groups with certain characteristics will differ due to different levels of mobility and different outcomes amongst the groups.

Table 1A below shows that students currently enrolled on provision which falls below the minimum numerical thresholds for one or more of the B3 metrics are more likely to be female, mature (21 or over), black or from more disadvantaged backgrounds compared to the undergraduate student population as a whole.

³ These thresholds are extracted from the [Office for Students student outcomes dashboard](#) (accessed 12/04/2023)

⁴ These data come from the [Office for Students size and shape of provision dashboard](#), which includes data on undergraduates at 404 of the 417 providers on the Office for Students register (03/02/2023).

⁵ This group is analysed because it is the group contained in the size and shape of provision dashboard, which is the data source with the best coverage of providers in scope.

Table 1A – Profile of undergraduate students, including their protected characteristics, at providers below at least one B3 threshold.

Grouping	Characteristic	Percentage at Providers who fall below Full-time First degree B3 Threshold ⁶	Percentage at Providers who fall below Any Undergraduate B3 Threshold ⁷	As a percentage of all Undergraduates in HE
Age	Mature (21+)	70%	42%	32%
Disability Status	Disabled	15%	18%	17%
Ethnicity	Asian	14%	13%	14%
	Black	15%	10%	9%
	Mixed	4%	5%	5%
	Other Ethnicity	3%	2%	2%
	White	63%	70%	70%
IMD Quintile ⁸	Quintile 1	32%	22%	21%
	Quintile 5	8%	19%	21%
Sex	Female	59%	58%	56%
	Male	41%	42%	44%

Source: [Office for Students student outcomes dashboard](#) and [Office for Students size and shape of provision dashboard](#)

Age

Undergraduate students currently enrolled on provision that is not meeting the minimum numerical thresholds for one or more of the B3 metrics are more likely to be older compared to the whole undergraduate student population.

Older students are more likely to have work and family commitments⁹, meaning they may need to study closer to home, which could limit the choice of HE provision available to them. Therefore, they may be at greater risk of being impacted negatively by a recruitment

⁶ This captures only full-time undergraduate students who study at provision whose full-time first degree metric was below the Office for Students minimum threshold for either completion, continuation or progression.

⁷ This captures all undergraduate students in either full-time or part-time study, who study at provision which had any undergraduate metric below an Office for Students minimum threshold. These levels are “first degree”, “other undergraduate” and “undergraduate with postgraduate components”. Apprenticeships are excluded as a mode of study.

⁸ Quintile 1 is most deprived. Data on IMD quintile is available from the OfS dashboard: [Size and shape of provision data dashboard: Data dashboard - Office for Students](#). POLAR data unavailable from the dashboard.

⁹ [Effective practice advice - Office for Students](#)

limit if they cannot obtain a place at their preferred provider and are unable to take up alternative educational opportunities.

However, older students would be positively impacted if the Government's guidance to the Office for Students on recruitment limits improves outcomes from provision in their locality, or provision that they were seeking to attend. They may also be diverted onto provision with better outcomes as a result of a recruitment limit.

Sex

Undergraduate students currently enrolled on provision that is not meeting the minimum numerical thresholds for one or more of the B3 metrics are slightly more likely to be female compared to the whole undergraduate student population.

Female students are more likely to have family commitments¹⁰, meaning they may need to study closer to home, which could limit the choice of HE provision available to them. Therefore, they may be at greater risk of being impacted negatively by a recruitment limit if they cannot obtain a place at their preferred provider and are unable to take up alternative educational opportunities.

However, female students would be positively impacted if the Government's guidance to the Office for Students on recruitment limits improves outcomes from provision in their locality, or provision that they were seeking to attend. They may also be diverted onto provision with better outcomes as a result of a recruitment limit.

Race (which includes nationality)

Undergraduate students currently enrolled on provision that is not meeting the minimum numerical thresholds for one or more of the B3 metrics are slightly more likely to be black compared to the whole undergraduate student population.

We expect black students to be impacted positively if the government's guidance to the Office for Students on recruitment limits improves outcomes from provision on which they are enrolled or diverted to. There could also be a negative impact for black students who could be more likely to be unable to enrol on their chosen provision. Some could have limited alternative options.

¹⁰ Female students are significantly over-represented in the population of childcare grant and parents' learning allowance claimant population. [Higher education student finance 2022 to 2023 - equality analysis \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

Other protected characteristics

We expect there to be a neutral impact on learners with regard to disability, gender re-assignment, marriage and civil partnership, pregnancy and maternity, religion or belief and sexual orientation.

Disadvantage

Although not a protected characteristic for the purposes of the Equality Act, we have also analysed the economic disadvantage status of students at providers we identify as being most at risk of breaching the Office for Students' condition B3. This is done using the Index of Multiple Deprivation (IMD) quintile measure of disadvantage.

Undergraduate students from the lowest IMD quintile are more likely to study at providers performing below the minimum numerical thresholds for one or more of the B3 metrics, compared to students from the highest quintile.

Accordingly, students with higher levels of disadvantage are more likely to be impacted positively by the government's guidance to the Office for Students on recruitment limits if this improves outcomes from provision in their locality, or if they are diverted onto provision with better outcomes as a result of a recruitment limit. However, they may be at greater risk of being impacted negatively by a recruitment limit if they cannot obtain a place at their preferred provider and are unable to take-up alternative educational opportunities.

Measure 2: Foundation Years

Policy description

The government is concerned about the significant and rapid increase in students undertaking some foundation years, as identified by the Independent Panel. This growth is concentrated in a small number of classroom-based subjects (such as business, or social sciences), which are less expensive to teach than other subjects, and that in many cases require little or no subject-specific entry requirements or knowledge.

For example, in academic year (AY) 2021/22, 51% of all foundation year students studied business and management courses (compared to 13% of first year undergraduate students), generally at low tariff providers, which deliver nearly 30% of all foundation years.¹¹ Such courses are likely to be easy for providers to recruit to, without clear need for an additional year of study at full undergraduate fee level, thus leading to poor value-for-money for students, and for taxpayers.

¹¹ <https://www.gov.uk/government/publications/understanding-the-costs-of-foundation-year-study>

The government has therefore decided to lower the maximum fee and loan limit to £5,760, in line with the highest standard funding rate for Access to HE Diplomas, for foundation year courses in classroom-based subjects¹², where the rapid and disproportionate growth is focused. We will retain the maximum fee and loan limits at £9,250 for all other subjects¹³. We envisage this change will be implemented for AY 2025/26.

The new fee limits will apply to all UK students studying at Approved (fee cap) providers in England and the amended loan limits will apply to all England-domiciled students studying in England or the devolved administrations.

Using protected characteristics data to understand which groups may be particularly impacted

Age

Table 2A –Student population segmented by age group and by subject price group – in foundation years and in first-year undergraduate study¹⁴.

Characteristic	Foundation Years			First Year Undergraduate		
	% age of those studying a classroom-based subject	% age of those studying other subjects	Overall Proportion of FY students	%age of those studying a classroom-based subject	%age of those studying other subjects	Overall Proportion of first year undergraduate students
Mature (21+)	81%	29%	64%	17%	20%	19%
Young (20 and under)	19%	71%	36%	83%	80%	81%

Source: Internal DfE analysis of unpublished HESA data from the 2021/22 academic year

In 2021/22, mature (21+) students represented the majority (64%) of foundation year students. In comparison, among comparable undergraduates, mature (21+) students represented a much smaller proportion of the total population (19%). Lower foundation year fee and loan limits for classroom-based subjects would represent a fairer price for classroom-based provision for both mature students and young students looking to study

¹² “Classroom-based” are subjects currently in the Office for Students’ Price Group D.

¹³ “Other subjects” are subjects currently in the Office for Students’ Price Groups B and C1.1, 1.2 and 2.

¹⁴ Figures reflect internal DfE analysis reflecting data from the 2021/22 academic year. Figures reflect UK domiciled first year foundation year students (entrants) on first degrees, studying full time (including sandwich) at English HE providers.

a classroom-based subject, with this impact being greatest for mature students, who make up 81% of classroom-based students, and who may be more debt averse¹⁵.

If providers respond to the reduced fee and loan limits by reducing the availability or quality of foundation years in classroom-based subjects, this will also particularly affect mature students, since they are overrepresented on these courses. However, the policy intent should mean these students will benefit from the policy, since it aims to ensure that the proliferation of provision that represents poor value for money is reduced, whilst simultaneously ensuring that higher cost and strategically important provision is protected and that foundation year provision overall used for the benefit of students to promote access to HE.

Table 2B – Student characteristics by disability status, across both foundation year students and comparable undergraduates¹⁶.

Characteristic	Foundation years			First Year Undergraduate		
	% disability status of those studying a classroom-based subject	% disability status of those studying other subjects	Overall Proportion of FY students	% disability status of those studying a classroom-based subject	% disability status of those studying other subjects	Overall Proportion of first year undergraduate students
No known disability	93%	80%	89%	84%	80%	82%
At least one known disability	7%	20%	11%	16%	20%	18%

Source: Internal DfE analysis of unpublished HESA data from the 2021/22 academic year

In 2021/22, 11% of foundation year students declared having some form of disability. This is a lower proportion than is seen among comparable undergraduates, of which 18% declared having some form of disability in the same period.

In 2021/22, 7% of students in classroom-based declared having some form of disability. These students will be positively impacted by the reduction in fees, especially as they may face higher costs of study (e.g., if they need additional support). In the same period, 20% of students studying other subjects declared having some form of disability. These students

¹⁵ The literature on debt aversion can be found at: [Higher education student finance 2022 to 2023 - equality analysis \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/101111/higher-education-student-finance-2022-to-2023-equality-analysis.pdf)

¹⁶ Figures reflect internal DfE analysis reflecting data from the 2020/21 academic year. Figures reflect UK domiciled first year foundation year students (entrants) on first degrees, studying full time (including sandwich) at English HE providers.

will pay relatively higher fees than those in classroom-based subjects; however, this represents no change to the current situation.

Race (which includes nationality)

Table 2C – Student characteristics by ethnicity across both foundation year students and comparable undergraduates¹⁷.

Ethnicity	Foundation years			First Year Undergraduates		
	% ethnicity of those studying a classroom-based subject	% ethnicity of those studying other subjects	Overall Proportion of FY students	% ethnicity of those studying a classroom-based subject	% ethnicity of those studying other subjects	Overall Proportion of first year undergraduate students
Asian	12.8%	16.6%	14.0%	13.9%	12.0%	12.7%
Black	13.6%	14.0%	13.7%	9.2%	8.6%	8.8%
Mixed	4.8%	6.5%	5.3%	5.7%	5.6%	5.6%
Other	3.7%	4.9%	4.2%	3.0%	3.5%	3.3%
White	55.6%	52.1%	54.5%	63.9%	67.0%	65.8%
Not known	3.8%	1.8%	3.2%	1.6%	1.1%	1.3%
N/A	5.6%	4.2%	5.2%	2.6%	2.3%	2.4%

Source: Internal DfE analysis of unpublished HESA data from the 2021/22 academic year

Among 2021/22 foundation year entrants, the majority (55%) of students identified as white. In comparison, among comparable undergraduates, 66% of students identified as white.

Reducing the fee and loan limits for foundation years in classroom-based subjects would benefit students from all ethnic backgrounds by ensuring they are charged a fairer cost for classroom-based provision. Students from ethnic minority backgrounds are likely to be more debt averse¹⁸. The decision to maintain existing fee and loan levels for all other subjects may particularly impact this group, given there is a greater proportion of ethnic minority students studying in higher-cost subjects compared to those in classroom-based subjects. However, this represents no change to the current situation.

¹⁷ Figures reflect internal DfE analysis reflecting data from the 2021/22 academic year. Figures reflect UK domiciled first year foundation year students (entrants) on first degrees, studying full time (including sandwich) at English HE providers.

¹⁸ <https://higherstrategy.com/debt-aversion/>

Sex

Table 2D – Student characteristics by sex across both foundation year students and comparable undergraduates¹⁹.

Characteristic	Foundation years			First Year Undergraduate		
	% sex of those studying classroom-based subject ^a	% sex of those studying other subjects	Overall proportion of FY students	% sex of those studying classroom-based subject ^a	% sex of those studying other subjects	Overall proportion of first year undergraduate students
Male	49%	55%	51%	40%	43%	42%
Female	51%	45%	49%	60%	57%	58%
Other	0%	0%	0%	0%	0%	0%

Source: Internal DfE analysis of unpublished HESA data from the 2021/22 academic year

Among foundation year entrants, there was an equal proportion of male and female students (51% and 49% respectively). In comparison, among comparable undergraduates, female entrants represented a slightly larger proportion of total students compared to male students (58% and 42% respectively).

The proportion of males and females studying a foundation year in classroom-based subjects were 49% and 51% respectively. The proportion among comparable students in other subjects were 55% for males and 45% for females.

As the proportion of males and females studying classroom-based foundation year subjects is similar, a fee limit change to these classroom-based subjects will not disproportionately impact students based on sex. Since there are slightly more males compared to females in the remaining price groups, a relatively higher fee limit for those courses could disproportionately affect males studying other subjects, given they account for a larger proportion of foundation year students studying subjects which are not classroom-based. However, this represents no change to the current situation.

¹⁹ Figures reflect internal DfE analysis reflecting data from the 2021/22 academic year. Figures reflect UK domiciled first year foundation year students (entrants) on first degrees, studying full time (including sandwich) at English HE providers.

Other protected characteristics

We expect there to be a neutral impact on learners with regards religion or belief, gender re-assignment, marriage and civil partnership, pregnancy and maternity, and sexual orientation.

Disadvantage

Table 2E – Student characteristics by disadvantage (POLAR quintile²⁰) across both foundation year students and comparable undergraduates²¹.

POLAR quintile ²²	Foundation Years			First Year Undergraduate
	% POLAR quintile of those studying classroom-based subjects	% POLAR quintile of those studying other subjects	Overall Proportion of FY students	Overall Proportion of Comparable First Year Undergraduates
	13%	16%	14%	13%
2	16%	17%	17%	16%
3	20%	20%	20%	19%
4	26%	24%	25%	23%
5	23%	22%	22%	29%

Source: Internal DfE analysis of unpublished HESA data from the 2021/22 academic year

Note: totals may not sum to 100% as unknown and other category excluded

Students from disadvantaged backgrounds are more likely to be debt averse²³ and are therefore more likely to be discouraged from entering HE if tuition fees and overall student debt are high. Reduced fee and loan limits for foundation years in classroom-based subjects would ensure such students are charged a fairer cost for lower-cost provision. Although students from all POLAR quintiles will be positively impacted by reducing the fee and loan limits for classroom-based subjects, we are not expecting any disproportionate impact on disadvantaged students.

²⁰ Data from internal analysis of HESA data where IMD quintile is unavailable

²¹ Figures reflect internal DfE analysis reflecting data from the 2020/21 academic year. Figures reflect UK domiciled first year foundation year students (entrants) on first degrees, studying full time (including sandwich) at English HE providers.

²² Quintile 1 = most deprived. [About POLAR and Adult HE - Office for Students](#)

²³ [Impact of the student finance system on participation, experience and outcomes of disadvantaged young people \(publishing.service.gov.uk\)](#)



Department
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