

## consultation response

### **Applying student number controls to alternative providers with designated courses - BIS consultation**

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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 340 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 application of student number controls to alternative providers with designated courses.

#### **Question 2: Do you have a preference for Method 1 (control based on eligible students) or Method 2 (control based on students accessing funding)? If so, why is this?**

We do not feel it appropriate for UCAS to show a preference towards a particular mechanism for the allocation of student numbers to alternative providers. However there are a number of key issues that we think it would be helpful to bring to your attention.

UCAS welcomes the uniformity that Method 1 would bring to the sector, especially if these institutions were to also be subject to the high grades policy. UCAS has taken a pro-active role in providing information and advice regarding student number controls to schools, advisers, parents and applicants. We feel that a consistent approach to student number controls across the sector would reduce the complexity and divergence that currently exists and make it easier to communicate the potential impact of these changes to all stakeholders<sup>1</sup>.

Method 2 introduces added complexities into the admissions process. Institutions do not currently consider whether or not a student will be funding their tuition independently, or whether they will be seeking support from the Government as part of the admissions process, as the student number control system in England counts eligible students and not those claiming student support.

UCAS collects information on how applicants intend to fund their tuition via the UCAS Apply form. Where this is known a fee code is allocated, but in some cases it will be too early for the applicant to determine how tuition fees will be met. Students may also change their minds about funding at a later date. UCAS shares this information with the Student Loans Company and this information is also passed to institutions at the start of the admissions

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<sup>1</sup> Information for students: <http://www.ucas.com/students/studentnumbercontrols>  
Information for parents and advisers: <http://www.ucas.com/parents/sncparents>

process. The indicative nature of the information collected via the UCAS application system could cause difficulties for alternative providers if they intended to use this to inform student numbers management under Method 2.

We also feel that Method 2 raises risks in relation to fair access and widening participation. This is discussed in our response to Question 6.

**Question 3: What is your view on submission of data to HESA? Do you think designated courses at alternative providers should participate in the Key Information Set and therefore complete the National Student Survey and Destination of Leavers in Higher Education survey (if student numbers are large enough to permit this)?**

UCAS recognise that the data requirements for Method 1 may prove burdensome for some alternative providers. UCAS members find the UCAS data transfer (also known as the \*J<sup>2</sup>) that UCAS provides to HESA useful in compiling their student record for full-time undergraduate students. In recent cycles UCAS have been able to make certain returns to HEFCE and HESA on behalf of institutions using their UCAS data. This has introduced new efficiencies for institutions that chose to use this service.

UCAS currently collect fee information on behalf of HESA and HEFCE that feed an institution's Key Information Set. UCAS plans to make Key Information Sets viewable to potential applicants via our new Course Finder product. Alternative providers that are UCAS members will benefit from the greater transparency and comparability this would provide if they were to participate in the Key Information Set.

A number of the institutions listed within the consultation are UCAS members and enjoy the benefits that being a member of UCAS brings. UCAS are currently reviewing the way in which it supports member institutions, including alternative providers, to ensure that we are better able to meet their needs and requirements. UCAS would be happy to discuss with yourselves, and any alternative providers, how UCAS can support the data requirements of any student number control mechanism that is implemented within the benefits of being a member of UCAS.

**Question 6: Equality considerations: Do you think that the proposals for applying student number controls will have any equality implications (e.g. positive, negative, or neutral) for people with protected characteristics (as set out in the Equality Act 2010), or people from low income groups? What impacts might there be and do you have any evidence of possible impacts**

Method 2 potentially raises risks in relation to fair admissions. If number controls are based on the actual number of FT students accessing loans and grants from the SLC, then there is a risk that information about how tuition fees will be met could influence some admissions decisions. This would raise concerns about social mobility and widening participation. The concept of home students self financing their own tuition has previous been rejected on this basis.

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<sup>2</sup> UCAS Data for HESA (also known as \*J) is the transaction which has been designed to supply data available from UCAS to institutions, in an appropriate format, so that it can be used in their HESA Student Record return.

**Question 7: Do you have any other comments on the proposals within this consultation document?**

The consultation document does not specify whether the student numbers allocated to alternative providers will come from the current student support budget, or whether additional funds will be given to HEFCE to accommodate this increase in the number of funded places. UCAS feel that this is a key piece of information that will be of interest to the entire sector.

UCAS believe it would be preferable for full implementation of any mechanism in 2014/15, regardless of which method is implemented. An introduction of any system for 2013/14 has the potential to significantly impact on institutions that are already planning for that year and making offers to students based on their current situation. Any changes for 2013/14 are likely to cause disruption to these institutions and may negatively impact applicants. Full implementation in 2014/15 would also provide institutions with sufficient time to prepare for this change and plan for any changes required, such as to their IT systems and data collection mechanisms.

UCAS welcomes the increased role of QAA in ensuring that higher education provision within alternative providers continues to reinforce the strong reputation the UK has for high quality teaching and learning.