

THE THIRD DEGREE

Re-examining fair access to higher education

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The Third Degree
Re-examining fair access to higher education
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About the Centre for Social Justice

Established in 2004, the Centre for Social Justice is an independent think-tank that studies the root causes of Britain's social problems and addresses them by recommending practical, workable policy interventions. The CSJ's vision is to give people in the UK who are experiencing the worst multiple disadvantages and injustice every possible opportunity to reach their full potential.

The majority of the CSJ's work is organised around five 'pathways to poverty', first identified in our ground-breaking 2007 report *Breakthrough Britain*. These are: educational failure; family breakdown; economic dependency and worklessness; addiction to drugs and alcohol; and severe personal debt.

Since its inception, the CSJ has changed the landscape of our political discourse by putting social justice at the heart of British politics. This has led to a transformation in government thinking and policy. For instance, in March 2013, the CSJ report *It Happens Here* shone a light on the horrific reality of human trafficking and modern slavery in the UK. As a direct result of this report, the Government passed the Modern Slavery Act 2015, one of the first pieces of legislation in the world to address slavery and trafficking in the 21st century.

Our research is informed by experts including prominent academics, practitioners and policy-makers. We also draw upon our CSJ Alliance, a unique group of charities, social enterprises and other grass-roots organisations that have a proven track-record of reversing social breakdown across the UK.

The social challenges facing Britain remain serious. In 2020 and beyond, we will continue to advance the cause of social justice so that more people can continue to fulfil their potential.



Executive summary

Not every individual wants to go to university, and there is enormous value in the rich tapestry of alternative training routes that exist. But pupils should have a proper choice either way; one that is firmly embedded in a system that allows talent and hard work to flow to their natural destinations.

For that to happen, we must boost resources for technical education, still sometimes a pale shadow of its academic cousin. But we must also ensure that access to higher education is not adversely shaped by disadvantage.

Regrettably, this is all too often the case. Just 12.3 per cent of the most disadvantaged pupils in England access full-time higher education by 19. Staggeringly, these individuals are also 15 times less likely to attend high-tariff institutions than their peers, and their relative chances of doing so have fallen for the first time since 2006.

Pupils from disadvantaged backgrounds face several obstacles to access. One prominent barrier, particularly when it comes to getting places at high-tariff institutions, is poor attainment. They are, on average, 18 months behind their peers by the time they take their GCSEs, and only 2.5 per cent of these individuals achieve AAB at A-level where two grades are in facilitating subjects.

But social capital, too, plays a part. Disadvantaged pupils do not have the same access to networks (and the resources, coaching and experiences they bring) that can influence whether they have the confidence to apply, aim for more selective institutions, or are able to fine-tune soft skills that can boost the strength of their applications.

Clear, astute and impartial careers advice could help offset some of the limitations that flow from this. Yet good quality careers advice in schools is desperately scarce – both in relation to academic routes and vocational pathways such as degree apprenticeships. And some schools inflict low expectations on their pupils.

Our predicted grades system also creates problems for high-achieving disadvantaged students, who are more likely to be under predicted than their high-achieving peers. And money, too, plays a part: some of our most disadvantaged pupils, who tend to be more debt averse than their peers, are put off higher education by its associated price tag.

There is more still. Some schools appoint in-house higher education specialists. Top independent schools clearly see the value in these appointees – not least, St Paul's School, which appoints 11. However, new CSJ-commissioned research shows that just one third of state secondary schools appoint in-house specialists, and that advantaged schools are nearly three times more likely to do so than their disadvantaged counterparts.

The collective weight of the obstacles faced by disadvantaged pupils is, therefore, considerable.

The government has tried to lighten some of this load. Providers wishing to charge higher fees must spend some of their revenue on broadening access, supporting student success, and helping students progress into work. Providers also allocate other sources of funding to these pursuits. And the Office for Students (OfS) supports access, too. It is estimated that, together, providers spent £817.7 million on outreach in 2018/19.

Although much of this work is admirable, there is room for improvement. New CSJ-commissioned research suggests that more than one in six secondary schools were not approached by a higher education institution for the purposes of outreach in the six months prior to being surveyed. This figure rises to one in five for the most disadvantaged secondary schools, which implies that the schools most likely to benefit from outreach are the least likely to have been approached. In addition, eight out of ten primary schools were not approached, which is concerning because children start to frame their future opportunities early in life, and their impressions tend to stick.

We also have concerns about the nature of some of the initiatives that exist. Although not indicative of the sector as a whole, some institutions have not been sufficiently focused on underrepresented groups, have not had continuous improvement in mind, have not been sufficiently ambitious for disadvantaged pupils, or have not adequately addressed the root causes of poor access.

The sector has taken a number of welcome steps to address these issues. But there are a number of outstanding problems. And while universities can contribute to fair access in many ways, it is unrealistic to expect them to exert the reach, and level of individual engagement, that is necessary to dismantle all the obstacles that exist.

It is time for a fresh approach. All pupils, regardless of background, should be free to make decisions about their futures based on their talents. Currently, we cannot say with confidence that this always happens – particularly for disadvantaged pupils who have the ability to reach more selective institutions. In our report, we offer a suite of practical recommendations which, if implemented, would give these individuals a fairer chance to assess and realise their goals.

Summary of recommendations

In this paper, we outline several major barriers faced by disadvantaged pupils in the context of access to higher education. We do not seek to resolve all those obstacles here, and in some cases highlight them for completeness. Poor attainment in schools, for example, is a function of many complex factors that sit outside this paper's remit. The recommendations we do make are outlined below.

Recommendation 1

- A small portion of the collective access and participation budget should be top-sliced to build a fair access fund, piloted in the first instance.
- The fund could be used to recruit in-house higher education specialists in disadvantaged secondary schools. These specialists would provide pupils with tailored information and guidance on higher education; help broaden pupils' fields of vision regarding their options; forge strong relationships with universities and build institutional knowledge about their different application processes and expectations; support pupils with the practicalities of admissions; and help pupils broaden their skills outside of the curriculum.
- The fund could be used to help disadvantaged primary schools. The nature of this support would be different to the offer at secondary level. Specialists would help primary aged disadvantaged children tackle the limitations they already subconsciously place on themselves about their options in life; increase their understanding of the link between education and work opportunities; and help them develop basic skills including communication, teamwork and confidence. We do not envisage a need for a permanent in-house presence; we see this instead as a less intensive, floating role among several primary schools.
- The fund could also be tendered to third sector organisations, potentially on a payment-by-results basis, to deliver support at primary or secondary level. Their aim would be to support disadvantaged pupils in the ways we have outlined above. Some charities (for instance, IntoUniversity) already do these things very well, so there is an existing pool of expertise to draw on.

Recommendation 2

- The decision in 2012 to raise tuition fees, and to allow students to borrow more to meet these costs, did not lead to a fall in applications from disadvantaged students. However, it is important that we do not assume the same logic will apply to the scrapping of maintenance grants, and the expansion of maintenance loans, in 2016. These changes disproportionately affect disadvantaged individuals. Students from the bottom 40 per cent of income earning families on average take on £57,000 of debt, while students from the top 30 per cent borrow £43,000. This contrasts with the previous finance system where debt was, according to the Institute for Fiscal Studies, “broadly flat across the parental earnings distribution”.
- While debt aversion may not prevent participation at a certain price point (disadvantaged students may feel able to take on a certain level of debt to cover fees and maintenance), there are limits to how elastic this principle is for the very poorest individuals. And the maintenance loans available to students assume a level of parental contribution that is less realistic for the most disadvantaged families. There is also evidence that some highly disadvantaged students are more debt averse than their peers, and that this is likely to put them off higher education.
- In this context, the government should reinstate carefully targeted means-tested maintenance grants for those individuals.

Recommendation 3

- There is evidence that our predicted grades system stunts disadvantaged pupils’ prospects. High-achieving students from disadvantaged backgrounds are more likely to be under predicted than high-achieving peers from better-off backgrounds.
- The government should replace the current system of predicted grades with one that is built on actual grades. A system built on post-qualification admissions would be fairer because it would:
 - circumvent the mismatch in talent and outcomes that exists;
 - remove from the equation competitive advantages that some schools derive from being more aware of universities’ varying approaches to predicted grades; and
 - avoid the need for a fraught and resource-heavy clearing system.

Recommendation 4

- According to recent fieldwork, just 12 per cent of university students thought they were well-informed about student finance, and 19 per cent of students who expected to take out tuition fee loans did not know how much debt they would be taking on. Other studies suggest that parents on low incomes tend to lack an understanding of the financial support that is available to students, and that many students are unknowledgeable about costs and available funding.

- It is, therefore, possible that some debt aversion is exacerbated by a poor understanding of the student finance system. The Government should commission specific qualitative work to better understand the nature and extent of this relationship in relation to disadvantaged pupils.
- To the extent that disadvantaged individuals are being put off higher education due to lack of understanding of student finance, the government should improve the flow of good quality information to those individuals. It could do this by introducing targeted information campaigns, which we know can work well in the context of improving access to higher education.

Recommendation 5

- The Office for Students (OfS) has made it clear that it wants higher education institutions' outreach targets to be more rigorous. One of its headline reforms is to insist that institutions set themselves more outcome-based targets.
- We strongly welcome this new focus on rigour and outcomes. However, while higher institutions were previously expected to spend at least 15 per cent of their tuition fee uplifts on access and participation, they now no longer need to do so. The OfS's decision to focus more on outcomes does not negate the need for an adequate resource base in the first place. As we saw from the National Foundation for Educational Research (NFER) research we commissioned, for instance, a significant number of schools, particularly in disadvantaged areas, were not approached by a higher education institution for the purpose of outreach activity in the six months prior to being surveyed.
- In this context, it makes sense to return to a system that obliges qualifying institutions to spend a minimum of their tuition fee uplifts on access and participation.

Recommendation 6

- While higher education institutions should do all they reasonably can to improve access to their own courses, more general support should also be rewarded in context. A university-led summer school at a top university, for example, may not necessarily lead to all, or even any, of its participants getting places at that particular institution, and yet would still be helpful if it prompted pupils to consider other strong options.
- The official guidance specifically refers to outcome targets that concentrate on "reducing the gaps in access, success, and progression for underrepresented groups among a provider's own students." And although the OfS's regulatory notice allows institutions some latitude to take a broader perspective, it is not clear how much weight it is prepared to attribute to broadening opportunity more generally.
- The OfS should signal clearly to providers that it will recognise, and proactively reward, outreach that boosts access more broadly, and not just in relation to their particular institutions.

chapter one

Disadvantaged pupils have poor access to higher education, particularly high-tariff universities

Participation rates for disadvantaged students in full-time higher education have risen

Higher education is not quite the faint prospect it once was for disadvantaged individuals. A number of proxies have been used to measure participation rates for these individuals and although none are perfect, together they build a picture that is, ostensibly, positive. According to UCAS's Multiple Equality Measure,¹ pupils (aged 18) from the most disadvantaged group in England were 83 per cent more likely to enter full-time higher education in 2018 than they were in 2006.² In 2016/17, in England, 25.6 per cent of pupils receiving free school meals at age 15³ were in full-time higher education by age 19, compared to 14.2 per cent in 2005/2006.⁴ And the percentage of pupils from low-participation areas of England who start full-time higher education rose by almost one percentage point between 2013/14 and 2017/18.⁵

1 These equality dimensions include sex, ethnic group, where people live (using the POLAR3 classification), secondary education school sector (state or private), and income background (as measured by whether a person was in receipt of free school meals (FSM), a means-tested benefit while at school)

2 UCAS, 2018, End of Cycle Report 2018: patterns of equality in England [Accessed via: www.ucas.com/data-and-analysis/undergraduate-statistics-and-reports/ucas-undergraduate-end-cycle-reports/2018-end-cycle-report]

3 While FSM is a blunt measure for analysing disadvantaged, and each university tackles different groups of individuals, there is an established link between FSM and multiple disadvantage. For instance, 79.7 per cent of FSM applicants are in the lowest Multiple Equality Measure quintile. (CSJ analysis of UCAS data: UCAS, 2018, Undergraduate Analysis Report. [Accessed via: www.ucas.com/data-and-analysis/ucas-undergraduate-releases/ucas-undergraduate-analysis-reports/equality-and-entry-rates-data-explorers])

4 DfE, 2018, Widening participation in higher education 2018, Main Tables, Table 1 [Accessed via: www.gov.uk/government/statistics/widening-participation-in-higher-education-2018]

5 CSJ analysis of HESA data: HESA, 2018, Who is in Higher Education? Widening Participation table [Accessed via: www.hesa.ac.uk/data-and-analysis/students/whos-in-he]

However, the access gap between disadvantaged pupils and their peers remains large, and is pronounced in most parts of England

Whichever way we choose to define disadvantage, it is clear that disadvantaged students still lag far behind their peers when it comes to accessing higher education. According to UCAS's Multiple Equality Measure, in the 2018 admissions year, 12.3 per cent of the most disadvantaged pupils (age 18) in England were accepted by higher education institutions, compared to 56.3 per cent of the most advantaged group.⁶

Only 12.3 per cent of the most disadvantaged pupils in England access full-time higher education by 19.

In the 2018 admissions process, 17.3 per cent of pupils in England on free school meals at age 15 accessed higher education at age 18, while the figure for their peers was 34.1 per cent.⁷ And in 2017/18, only 12 per cent of students in English higher education institutions were from the lowest participation neighbourhoods in England.^{8,9}

The access gap between disadvantaged pupils and their peers is also highly pronounced in many parts of the country. For example, in 2016/17, in 84 out of England's 153 local authorities, students receiving free school meals at age 15 were around two times less likely to access higher education by 19 than their peers.¹⁰

In almost every part of the country, disadvantaged pupils are less likely to attend high-tariff universities than their peers

Scratch beyond the surface, and the nature of the access gap takes on another concerning dimension. Not only are disadvantaged pupils less likely to attend higher education more generally than their peers, they are also far less likely to attend high-tariff universities than their peers. A high-tariff university is one that sits in the top tier (approximately the top third) of universities when it comes to the strength of their students' grades at the point of admission.

6 UCAS, 2018, End of Cycle Report 2018: patterns of equality in England, pg 4 [Accessed via: www.ucas.com/file/212841/download?token=fR1vSwMY]

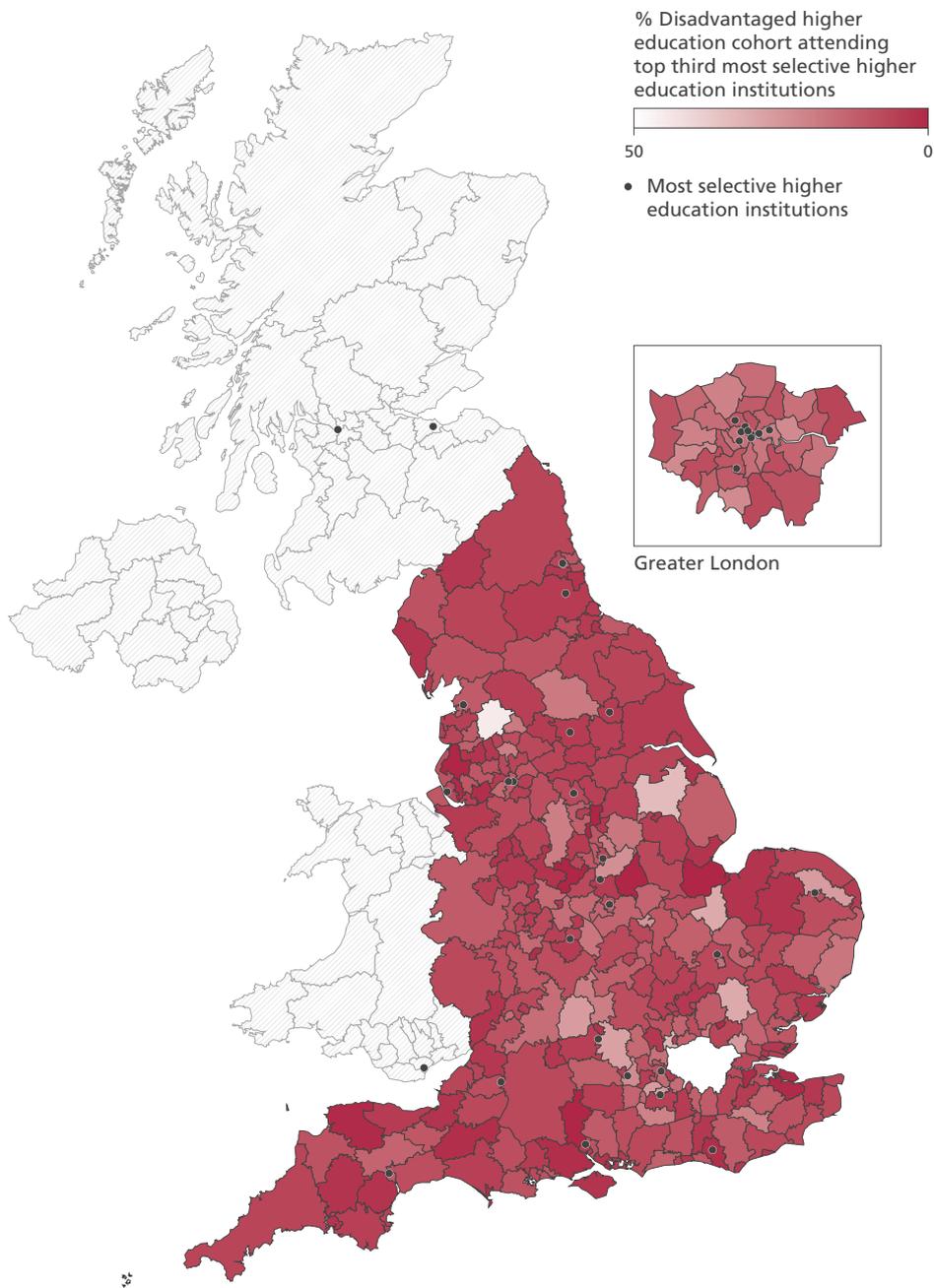
7 UCAS, 2018, End of Cycle Report 2018: patterns of equality in England, pg 6 [Accessed via: www.ucas.com/data-and-analysis/undergraduate-statistics-and-reports/ucas-undergraduate-end-cycle-reports/2018-end-cycle-report]

8 HESA, 2018, Who's in Higher Education? Widening Participation table [Accessed via: www.hesa.ac.uk/data-and-analysis/students/whos-in-he]

9 The Higher Education Statistics Authority (HESA) uses the bottom two quintiles when using this measure.

10 CSJ analysis of DfE data: DfE, 2018, Widening Participation in Higher Education 2017, Table 2 [Accessed via: www.gov.uk/government/statistics/widening-participation-in-higher-education-2018] NB: FSM and Non-FSM refer to whether pupils were receiving Free School Meals at age 15 or not. The DfE now include further education (above level 4) and higher education institutions together to create a parity of esteem

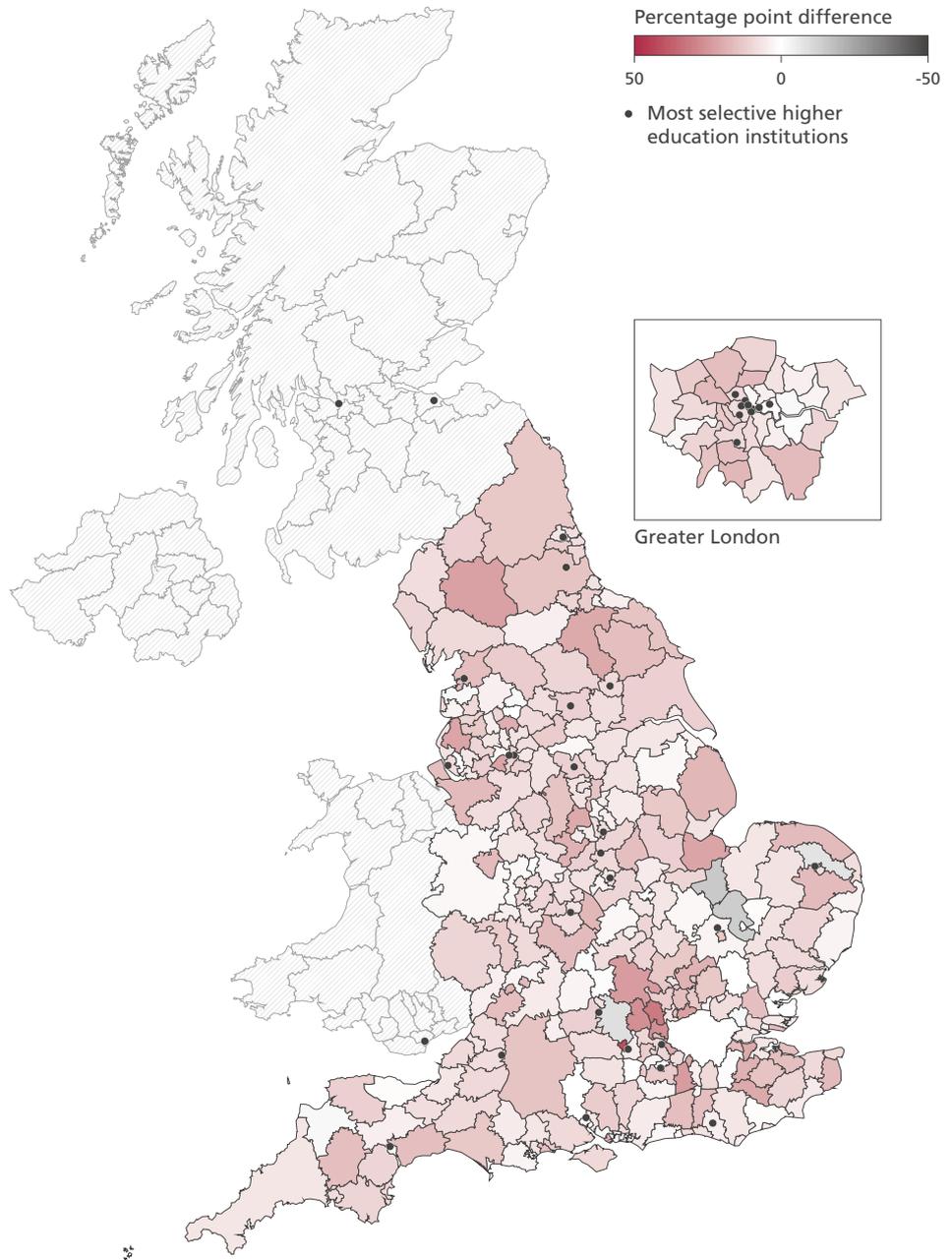
Figure 1: Rate of disadvantaged individuals progressing to higher education institutions who attended the top third most selective higher education institutions (range: 0–49 per cent), by local authority district area (students domiciled in England, 2016/17)



Source: CSJ analysis of DfE data.¹¹

11 CSJ analysis of DfE data: DfE, 2018, Destinations of KS4 and KS5 pupils [Accessed via: www.gov.uk/government/statistics/destinations-of-ks4-and-ks5-pupils-2017] NB: there are some outliers in this data due to small samples, including Ribble Valley where only 10 disadvantaged pupils are in this local authority district

Figure 2: Difference in the rate of most/least disadvantaged individuals progressing to higher education institutions who attended the top third most selective higher education institutions (% point difference), by local authority district (students domiciled in England, 2016/17)



Source: CSJ analysis of DfE data.¹²

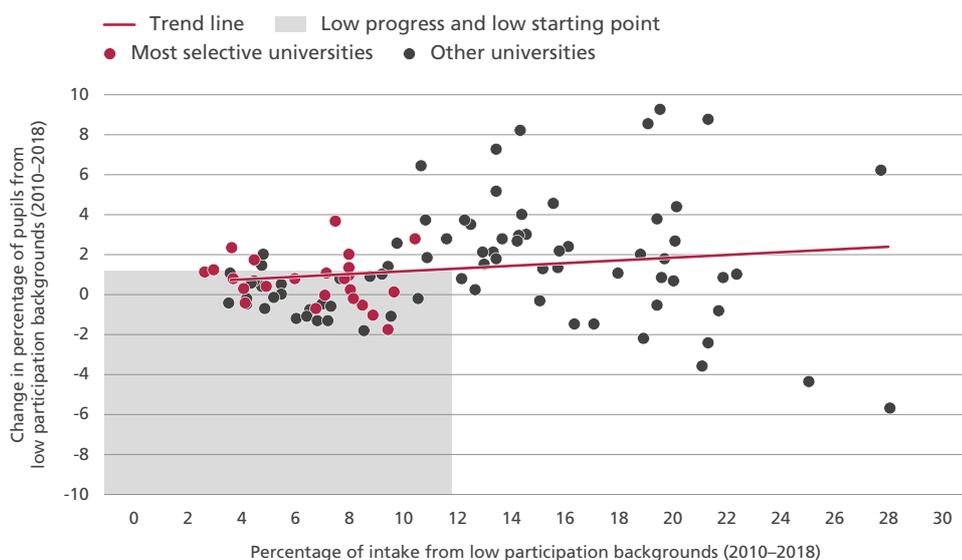
12 CSJ analysis of DfE data: DfE, 2018, Destinations of KS4 and KS5 pupils [Accessed via: www.gov.uk/government/statistics/destinations-of-ks4-and-ks5-pupils-2017] NB: there are some outliers in this data due to small samples, including Ribble Valley where only 10 disadvantaged pupils are in this local authority district

Viewed in this particular context, the level of disparity between disadvantaged pupils and their peers is staggeringly high. According to UCAS’s Multiple Equality Measure, in the 2018-admissions year, our most disadvantaged English pupils were 15 times less likely to get places at high-tariff institutions than our most advantaged applicants. Even worse, the gap between these two groups has widened for the first time since 2006.¹³

Disadvantaged pupils are 15 times less likely to attend high-tariff institutions than their peers.

The geographical prevalence of this particular form of access gap is also striking. In virtually no part of England are disadvantaged students on free school meals (at age 15) more likely to attend high-tariff institutions than their peers. In 2016/17, this happened in just 17 out of England’s 326 local authority district areas.¹⁴ In five local authority district areas, not one disadvantaged pupil made it to a high-tariff institution after completing Key Stage 5, despite a sizeable number of their peers doing so.^{15,16} And in most cases, the magnitude of the access gap is eye-wateringly large: in 73 per cent of local authority district areas, disadvantaged applicants are 50 per cent less likely to attend high-tariff institutions than their peers.

Figure 3: Per cent of pupils from low participation areas by university (2010) and the change in these figures between 2010 and 2018



Source: CSJ analysis of UCAS data.¹⁷

13 UCAS, 2018, End of Cycle Report 2018: patterns of equality in England [Accessed via: www.ucas.com/data-and-analysis/undergraduate-statistics-and-reports/ucas-undergraduate-end-cycle-reports/2018-end-cycle-report]
 14 CSJ analysis of DfE data: DfE, 2018, Destinations of KS4 and KS5 pupils [Accessed via: www.gov.uk/government/statistics/destinations-of-ks4-and-ks5-pupils-2017]
 15 CSJ analysis of DfE data: using the DfE’s methodology on selecting the third top most selective universities [Accessed via: www.gov.uk/government/statistics/destinations-of-ks4-and-ks5-pupils-2017 – Destinations of KS4 and KS5 pupils 2017: quality and methodology information]
 16 In three of these cases, this was because of a low absolute number of disadvantaged students; however, this was not the case in Merton (London) and South Holland (Lincolnshire), which had a similar student cohort to Rossendale (Lancashire) (420 students), and yet in the latter district area, almost 20 per cent of disadvantaged students entered the top third most selective higher education institutions
 17 CSJ analysis of UCAS data: UCAS, 2018, Equalities data [Accessed via: www.ucas.com/data-and-analysis/undergraduate-statistics-and-reports/ucas-undergraduate-reports-sex-area-background-and-ethnic-group/2018-entry-ucas-undergraduate-reports-sex-area-background-and-ethnic-group]

Better-off students also have an enduring grip on high-tariff university places. As Figure 3 demonstrates, between 2010/11 and 2018/19, the concentration of disadvantaged students in these universities remained stubbornly low when compared to many other universities. The horizontal axis in Figure 3 shows the proportion of each university's cohort that came from the lowest participation areas (the lowest quintile using POLAR 3 data) in 2010/11. The vertical axis reflects the change in this figure between 2010/11 and 2018/19. The red dots represent the most selective universities, as defined by the DfE. We excluded universities that solely focus on single subjects (e.g. music or art), and only included universities in England.

The box in the bottom left-hand corner of the graph reflects universities that made relatively little progress over eight years from already low starting points. These universities all had a below-average intake of students from the lowest quintile participation areas in 2010/2011 and did not, in the following eight years, increase the size of their low-participation cohorts by at least the average rate observed in other universities. Most of the country's more selective universities (red dots) are bunched in this area.

chapter two

Disadvantaged pupils face several barriers to access

Disadvantaged pupils perform less well in school

Attainment gaps open early and the weight of early disadvantage tends to grow heavier from there. Disadvantaged pupils are, on average, 4.5 months behind their peers at the end of reception, 9.2 months behind at the end of primary school, and 18.1 months behind by the time they take their GCSEs.¹⁸ Even when they perform well at an early stage, they are more prone to then slipping behind than their peers. According to one recent study, for example, just 52 per cent of high attaining disadvantaged pupils at Key Stage 2 subsequently achieved 5 A*–A GCSEs, whereas the figure for their peers was 72 per cent.¹⁹

Disadvantaged students are, on average, 18 months behind by the time they take their GCSEs.

In this context, it is unsurprising that disadvantaged students tend also to perform worse at Key Stage 5. Individuals eligible for free school meals are, for example, around half as likely to achieve three A grades at A-level as their peers,²⁰ par for the course these days for many of the more competitive university courses. And only 2.5 per cent of these individuals achieve AAB or better at A-level where two grades are in facilitating subjects.²¹

18 Education Policy Institute, 2019, Education in England: Annual Report 2019 [Accessed via: epi.org.uk/publications-and-research/annual-report-2019]

19 The Sutton Trust, 2018, Potential for Success: fulfilling the promise of highly able students in secondary schools [Accessed via: www.suttontrust.com/research-paper/potential-for-success-schools-high-attainers], pg 30

20 DfE, 2017, A level attainment by pupil characteristics, pg 5 [Accessed via: www.gov.uk/government/publications/a-level-attainment-by-pupil-characteristics] NB: the data could only match 82.2 per cent to the census records, and so figures are indicative, not complete

21 DfE, 2018, Destinations of KS4 and KS5 pupils 2017: key stage 5 national tables [Accessed via: www.gov.uk/government/statistics/destinations-of-ks4-and-ks5-pupils-2017] NB: facilitating subjects are subjects that are deemed to enable access to the most prestigious universities. These subjects include: Biology, Chemistry, Physics, Mathematics, Further Mathematics, Geography, History, English Literature and Classical/Modern Languages

Although higher education institutions tend to exercise some latitude in their admissions policies, there is only so much they can do to flex their grade requirements. And ultimately, poor attainment is a powerful barrier to access. According to a study by the IFS, the difference in access to university between the 20 per cent most/least advantaged students was entirely explained by attainment at age 16. And attainment at this age also explains a substantial portion of the access gap when it comes to “high status” institutions, specifically.²²

Just 2.5 per cent of disadvantaged students achieve AAB or better at A-level where two grades are in facilitating subjects.

It is not just the intrinsic lower market value of poorer grades that limits options; low attainment can also have a depressing effect on aspiration. A recent evaluation of school strategies to raise high-achieving disadvantaged pupils’ aspirations, for instance, found that in many cases, schools and colleges viewed raising attainment as an important precursor to cultivating high aspiration.²³ The authors of the report concluded that “for some students, unless attainment [could] be raised then raising aspirations to attend HE was less relevant.”²⁴

Attainment alone cannot explain poor access

Although poor attainment is an influential brake on access – particularly to more selective institutions – it is certainly not its sole determinant. It cannot, for instance, explain why high performing disadvantaged students do not unlock the opportunities their grades merit. One recent study found that high-achieving disadvantaged students were more likely to be under-matched at university than their peers; that is to say, they were more likely to apply to universities where the median student had received lower grades than they had attained.²⁵ Conversely, low-attaining advantaged students were more likely to be over-matched at university; in other words, they were more likely to have lower grades than their peers at the same universities.²⁶

High-attaining disadvantaged students are more likely to have higher grades than their peers at the same universities.

Pupils in high-performing independent schools are also more likely to apply to Oxbridge than those in similarly high-performing state schools. According to one report, in one

22 Institute for Fiscal Studies, 2016, Education inequality and social mobility [Accessed via: [www.ifs.org.uk/uploads/Presentations/Policy%20Exchange%20event%20on%20FE%20and%20HE%20-%2015th%20September%202016%20\(Claire%20Crawford\).pdf](http://www.ifs.org.uk/uploads/Presentations/Policy%20Exchange%20event%20on%20FE%20and%20HE%20-%2015th%20September%202016%20(Claire%20Crawford).pdf)]

23 DfE, 2014, School and college-level strategies to raise aspirations of high-achieving disadvantaged pupils to pursue higher education investigation: research brief, pg 3 [Accessed via: assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/278123/RB296_-_School_and_College-level_Strategies_to_Raise_Aspirations_of_High-achieving_Disadvantaged_Pupils_to_Pursue_Higher_Education_Investigation.pdf]

24 Ibid, pg 8

25 Wyness, G, 2017, Rules of the Game: disadvantaged students and the university admissions process [Accessed via: www.suttontrust.com/research-paper/rules-of-the-game-university-admissions] NB: disadvantage is measured using POLAR3 data

26 Ibid, pg 11

recent admissions cycle, 23 per cent of pupils in the top fifth of independent schools for exam results applied to Oxbridge, compared to 11 per cent of pupils in the top fifth performing comprehensive schools.²⁷

There are, of course, plenty of reasons why pupils might choose to attend particular institutions over others. But the examples outlined above raise important questions about the decisions pupils are making. Do, for instance, all disadvantaged pupils aim as high as their grades suggest they could? Do they receive the same level of guidance when navigating their options as their peers? Do they get the same support and coaching when making applications? And do they have the same opportunities to develop the kind of soft skills that tend to strengthen applications? All too often, as we explain in the next section, the answer to these questions is “no”.

Disadvantaged pupils do not have the same social capital as their peers, and often lack access to advice in schools, all of which can narrow their field of vision regarding their options

Social capital

The OECD defines social capital as “the links, shared values and understandings in society that enable individuals and groups to work together.” As it points out, “access to information and influence through social networks confers private benefits on individuals.”²⁸

Viewed from several vantage points, it is clear that disadvantaged pupils do not have the same social capital as their peers. In the context of shaping access to higher education, this might manifest itself in a number of ways and we outline several examples below. In each case, their lack of access to certain networks (and the resources, coaching and experiences that are associated with those networks) can influence whether they have the confidence to apply; aim for selective institutions when their grades are strong; and are able to fine-tune soft skills that boost the strength of their applications.

We know, for instance, that high-achieving disadvantaged pupils are more reluctant to see university as a natural choice than their peers, seemingly due to a sense of cultural alienation. One Department for Education (DfE) report, for instance, found evidence that this cohort sometimes saw higher education as not being suitable for “for people like us.”²⁹ According to a recent report by the Office for Students (OfS), some parents worry that their children will not be able to “socially adapt” to their academic peers.³⁰ Another study found that white working-class boys’ lack of engagement with higher education stemmed in part from a tendency to underappreciate the link between higher education

27 Sutton Trust, 2018, Access to advantage, pg 33 [Accessed via: www.suttontrust.com/research-paper/access-to-advantage-university-admissions]

28 OECD, 2007, OECD insights: human capital, pg 102 [accessed via: www.oecd.org/insights/37966934.pdf]

29 DfE, 2014, School and college-level strategies to raise aspirations of high-achieving disadvantaged pupils to pursue higher education investigation: research brief, pg 108 [Accessed via: assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/278117/RR296_School_and_College-level_Strategies_to_Raise_Aspirations_of_High-achieving_Disadvantaged_Pupils_to_Pursue_Higher_Education_Investigation.pdf]

30 OfS, 2019, Perceptions of higher education outreach and access activity [Accessed via: www.officeforstudents.org.uk/media/ddd39369-6072-4b11-b07d-8f3dfdf1da2a/perceptions-of-higher-education-outreach-and-access-activity.pdf]

and improved working outcomes.³¹ And a considerable body of literature suggests that disadvantaged pupils are heavily influenced by peer networks when making decisions about higher education.^{32,33}

Disadvantaged pupils sometimes see higher education as not being suitable for “for people like us”.

Even when high-performing disadvantaged students do see higher education as a possibility, they do not always seem to recognise the full range of options open to them. And despite the Russell Group’s well-established reputation for strong academic performance, relatively few high-achieving disadvantaged students are encouraged to apply to these universities. According to one study, just 14 per cent of 11–16 schools, 28 per cent of 11–18 schools, and 29 per cent of colleges reported that they specifically targeted high-achieving disadvantaged pupils to encourage applications to these universities.³⁴

Disadvantaged pupils are also less likely to benefit from school-based enrichment activities. According to one study, 84 per cent of pupils in the highest socioeconomic group participated in at least one school activity or class (such as swimming, science, crafts clubs, music classes or sports/fitness clubs) at the point of interview, compared to 45 per cent in the lowest socioeconomic group.³⁵ According to a separate report, 35 per cent of secondary schools with the most disadvantaged pupils offer debating clubs, compared to 70 per cent of secondary schools with the most advantaged pupils.³⁶ These facts are salient because pupils who do not participate in extra-curricular activities are almost twice as likely to say that they do not plan to go into higher education as those who do.³⁷ They are, as a separate Sutton Trust report has outlined, also less able to fill their applications with the kinds of extra-curricular activities that can raise their prospects of admission.³⁸

High-performing disadvantaged students are prone to underselling their achievements. They are, for instance, more likely to apply to institutions where the median student has a lower level of attainment than their own.³⁹ And they are four times more likely to select a university simply because their friends are going there than their more advantaged peers.⁴⁰ It is likely that these trends are, at least in part, driven by lack of access to the kind

31 LKMco, 2016, The underrepresentation of white working class boys in higher education: the role of widening participation [Accessed via: www.lkmco.org/wp-content/uploads/2016/07/The-underrepresentation-of-white-working-class-boys-in-higher-education-baars-et-al-2016.pdf]

32 Archer, L., Hollingworth, S. & Halsall, A. (2007) ‘University’s not for Me — I’m a Nike Person’: Urban, Working-Class Young People’s Negotiations of ‘Style’, Identity and Educational Engagement. *Sociology*, 41(2): 219–237

33 Harrison, N. & Hatt, S. (2011). Expensive and failing? The role of student bursaries in widening participation and fair access in England. *Studies in Higher Education*, 37(6): 695–712

34 DfE, 2014, School and college-level strategies to raise aspirations of high-achieving disadvantaged pupils to pursue higher education investigation: research brief, pg 90 [Accessed via: assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/278117/RR296_-School_and_College-level_Strategies_to_Raise_Aspirations_of_High-achieving_Disadvantaged_Pupils_to_Pursue_Higher_Education_Investigation.pdf]

35 Sutton Trust, 2018, Parent power 2018: how parents use financial and cultural resources to boost their children’s chances of success [Accessed via: www.suttontrust.com/wp-content/uploads/2018/09/Parent-Power-2018.pdf], pg 4

36 Sutton Trust, 2017, Life Lessons: improving essential life skills for young people [Accessed via: www.suttontrust.com/research-paper/life-lessons-workplace-skills], pg 18

37 Ibid.

38 Sutton Trust, 2017, Rules of the Game: disadvantaged students and the university admissions process [Accessed via: www.suttontrust.com/wp-content/uploads/2017/12/Rules-of-the-Game.pdf], pg 24

39 Ibid, pg 13

40 Teach First, 2017, Impossible? Beyond access: getting to university and succeeding there [Accessed via: www.teachfirst.org.uk/sites/default/files/2017-09/TF-CTI-UNI-Report.pdf], pg 8

of information their better-off peers routinely enjoy. As one government pilot demonstrates, even modest increases in targeted information flows can help disadvantaged individuals understand their options more clearly. The researchers who oversaw that particular pilot estimated that 222 additional young people attended selective universities as a result of a targeted campaign that cost just £45.05 per additional student.⁴¹ And according to another DfE study, just having the chance to visit universities is likely to be “extremely significant in making final choices about where to study”.⁴²

Just 45 per cent of students in the lowest socio-economic group participate in at least one school activity or class.

The links, shared values and understandings that define social capital are not just shaped by direct human agency; they are also shaped by the environments in which people live. There is evidence, for instance, that growing up in economically stagnant areas affects the way in which people interpret their options in life. A qualitative study by the DfE, for example, found that in some instances, “where employment opportunities and in particular graduate employment opportunities are scarce or less visible to young people and parents, the benefits of higher education can appear less secure.”⁴³

Access to good advice in schools

Access to clear, astute and impartial advice in schools and colleges would help offset some of the problems we have highlighted above. Just having someone to review a university application, for example, could be helpful. As the Sutton Trust reported in 2012, “applicants from sixth form colleges make, on average, three times as many writing mistakes as those from independent schools.”⁴⁴

Having access to good advice would also help more pupils understand student finance. Currently, not all students have a strong grasp of the financial commitments they are making. According to recent fieldwork, just 12 per cent of university students thought they were well-informed about student finance, and 19 per cent of students said they did not know what amount of tuition loan they had taken out.⁴⁵

A qualitative research report by the DfE in 2017 found that there was also a “potentially pervasive” lack of “understanding on the part of parents on low incomes of the financial support that is available to students.”⁴⁶ This is corroborated by a recent report by the OfS, which found that a lack of “understanding of university tuition fees and perceived

41 DfE, 2017, Encouraging people into university: research report [Accessed via: assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/603737/Encouraging_people_into_university.pdf], pg 17

42 Department for Business Innovation and Skills, 2015, Understanding progression into higher education for disadvantaged and under-represented groups [Accessed via: assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/474269/BIS-15-462-understanding-progression-into-higher-education-final.pdf], pg 81

43 DfE, 2017, Understanding the changing gaps in higher education participation in different regions of England [Accessed via: assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/604393/Higher_education_understanding_participation_gaps.pdf], pg 12

44 Sutton Trust, 2012, Is the Personal Statement a fair way to assess university applicants? [Accessed via: www.suttontrust.com/wp-content/uploads/2012/12/JONESPERSONALSTATEMENTS-2.pdf], pg 10

45 DfE, 2018, Influence of Finance on Higher Education Decision-making [Accessed via: assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693188/Influence_of_finance_on_higher_education_decision-making.pdf]

46 DfE, 2017, Understanding the changing gaps in higher education participation in different regions of England: Research Report [Accessed via: assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/604393/Higher_education_understanding_participation_gaps.pdf], pg 51

associated debt"⁴⁷ presented the greatest obstacle to parents endorsing university as an option for their children. And in its impact report on the first year of the National Collaborative Outreach Programme (a government sponsored outreach programme for young people), CFE Research concluded that "learners [were], overall, less knowledgeable about the practical elements of HE, including the costs, funding available, and accommodation options" than the benefits of studying at that level.⁴⁸

Despite the importance of receiving effective guidance in schools, good quality careers advice is desperately scarce. Just under one in five schools in England do not meet any of the eight Gatsby benchmarks, a series of internationally respected benchmarks that help governments quality assure careers advice in schools.⁴⁹ Only 11 per cent of schools in England meet more than half of these benchmarks. And on average, schools in England meet just over two of the benchmarks.

Around a fifth of our schools do not meet any of the eight internationally respected standards for careers advice in schools.

The landscape is similarly underwhelming when it comes to advising pupils on higher education, specifically. Some schools, for instance, appear to exhibit a soft bigotry of low expectations in relation to some of their pupils. According to one recent survey, 43 per cent of all secondary school teachers and leaders rarely or never advised gifted pupils to apply to Oxbridge. When asked why, among other reasons, 13 per cent said they did not think these pupils would be happy there; 9 per cent said they did not think these pupils would perform well academically there; and 19 per cent wrote off their chances of making successful applications.⁵⁰ In addition, while engaging pupils' parents can help broaden the options that are available to them, an OfS-commissioned report recently found that most schools did not actively seek to engage parents when it came to higher education outreach. And where schools sent parents news bulletins, either by text or by email, they made few references to higher education or the outreach schools were receiving from higher education institutions.⁵¹

There is also a dearth of good quality advice, guidance and support in relation to higher-level apprenticeships. We know that many schools do not inform and advise children about apprenticeships; according to one survey, only 41 per cent of 11–16-year-old pupils said that a teacher discussed the idea of an apprenticeship with them at school.⁵² According to the same survey, just 21 per cent of all teachers said they would always or

47 OfS, 2019, Perceptions of higher education outreach and access activity [Accessed via: www.officeforstudents.org.uk/media/ddd39369-6072-4b11-b07d-8f3dfdf1da2a/perceptions-of-higher-education-outreach-and-access-activity.pdf]

48 CFE, Behavioural Insights Team, and Sheffield Hallam University, 2018, National Collaborative Outreach Programme: Year one report of the national formative and impact evaluation, including capacity building with NCOP consortia [Accessed via: cfe.org.uk/app/uploads/2018/08/2018_ncopyyear1exec.pdf], pg 10

49 The Careers & Enterprise Company, 2018, State of the Nation 2018: Careers and enterprise provision in England's schools [Accessed via: www.careersandenterprise.co.uk/sites/default/files/uploaded/1084_state_of_the_nation_v9_digital2.pdf], pg 10
NB: 3,092 schools in the sample

50 Sutton Trust, 2016, Teachers' Oxbridge Perceptions Polling [Accessed via: www.suttontrust.com/research-paper/teachers-oxbridge-perceptions-polling]

51 OfS, 2019, Perceptions of higher education outreach and access activity [Accessed via: www.officeforstudents.org.uk/media/ddd39369-6072-4b11-b07d-8f3dfdf1da2a/perceptions-of-higher-education-outreach-and-access-activity.pdf]

52 Sutton Trust, 2018, Apprenticeship Polling 2018 [Accessed via: www.suttontrust.com/wp-content/uploads/2018/07/Apprenticeship-polling-2018-4.pdf]

usually “advise high performing students to opt for an apprenticeship over university”. And 64 per cent of all teachers would rarely or never advise high performing students “to opt for an apprenticeship route over university”.

At the same time, better-off families are more adept at identifying, and capitalising on, high-level opportunities in the apprenticeships sector than their disadvantaged peers. For instance, these families are 2.5 times more likely to know about degree-level apprenticeships than their less well-off peers.⁵³ And degree-level apprentices are twice as likely to come from the least deprived areas in the country as they are from its most deprived areas.⁵⁴ All of which reinforces the importance of improving advice on apprenticeships in our schools.

The predicted grades system stunts opportunity for high-achieving disadvantaged students

Talent and work ethic should flow to their rightful destinations, free from any distortionary influences and barriers. There is evidence that our predicted grades system is undermining this. High-achieving students from disadvantaged backgrounds are more likely to be under predicted than high-achieving peers from better-off backgrounds.⁵⁵ In total, it is estimated that around 1,000 high achieving disadvantaged students have their grades underpredicted each year.⁵⁶ In a system that relies on predicted grades for entrance to university, this means that high-achieving disadvantaged students are not being matched with the universities that their talents and work ethics merit. Conversely low-achieving advantaged students are more likely to enrol on courses with peers who have stronger grades than they do (in other words, they are over matched).⁵⁷

Around 1,000 high achieving disadvantaged students have their grades underpredicted each year.

The Government should move to an alternative system. A system built on post-qualification admissions would be fairer. It would circumvent the mismatch in talent and outcomes that exists. And it would remove from the equation competitive advantages that some schools derive from being more aware of universities’ varying approaches to predicted grades.⁵⁸ A new system based on earned grades would also avoid the need for a fraught and resource-heavy clearing system.

53 Chartered Management Institute, 2017, The Age of Apprenticeships [Accessed via: www.managers.org.uk/~media/Files/PDF/Infographics/Age-of-Apprenticeships-infographic-August-2017.pdf]

54 CSJ analysis of DfE data: DfE, 2019, Deprivation tables for Further Education and Skills: December 2018 [Accessed via: www.gov.uk/government/statistical-data-sets/fe-data-library-further-education-and-skills]

55 Wyness, G, 2017, Rules of the Game: disadvantaged students and the university admissions process [Accessed via: www.suttontrust.com/research-paper/rules-of-the-game-university-admissions] NB: disadvantage is measured by POLAR3 data, pg 3

56 Wyness, G, 2016, Predicted grades: accuracy and impact, University and College Union, London [Accessed via: www.ucu.org.uk/media/8409/Predicted-grades-accuracy-and-impact-Dec-16/pdf/Predicted_grades_report_Dec2016.pdf], pg 16

57 Ibid

58 Ibid

The most disadvantaged students tend to be relatively debt averse and, in some cases, this seems to put them off higher education

There is evidence that some disadvantaged students are more debt averse than their peers, and that this can put them off higher education.⁵⁹ The most recent comprehensive attempt to understand debt aversion is a study commissioned by the DfE, which included a survey of prospective students who had applied through UCAS. Among other things, the study aimed to gauge the likely impact of the new system of maintenance loans (which replaced maintenance grants) on pupils' decisions to pursue higher education.

The findings of the report are not without limitation. For instance, we do not know the extent to which self-reported debt- and price-aversion translated into actual decisions not to study. And we cannot ascertain the extent to which people's poor understanding of student finance shaped their decisions (the DfE survey found that 19 per cent of students who expected to take out tuition fee loans did not know how much debt they would be taking on, a figure that rose to 24 per cent for individuals who received a full grant at the time of the survey).⁶⁰

Nonetheless, this data provides us with valuable insights into the nature and prevalence of debt aversion among disadvantaged prospective students. It shows us, for example, that some of the most disadvantaged students (12 per cent of students with a full maintenance grant under the previous system) would not have applied to university in the absence of a full grant – even if these grants were replaced with additional maintenance loans worth £2,000.⁶¹ Based on these figures, for the 2012/13 entry cohort, up to 17,351 disadvantaged students (who received the full maintenance grant allowance) may not have accessed university in the absence of maintenance grants.⁶²

Thousands of disadvantaged learners a year are likely to be put off from higher education due to the removal of maintenance grants.

The decision in 2012 to raise tuition fees, and to allow students to borrow more to meet these costs, did not precipitate a fall in the number of disadvantaged applicants. However, it is important that we do not assume the same logic will apply to the scrapping of maintenance grants, and the expansion of maintenance loans, in 2016. These changes disproportionately affect disadvantaged individuals. Students from the bottom 40 per cent

59 See, for example Callender, C. and Mason, G. 2017, Does student loan debt deter higher education participation? New evidence from England, pg 27 [Accessed via: www.llakes.ac.uk/sites/default/files/58.%20Callender%20and%20Mason.pdf]

60 DfE, 2018, Influence of Finance on Higher Education Decision-making [Accessed via: assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693188/Influence_of_finance_on_higher_education_decision-making.pdf], pg 29

61 Ibid, figure 28 NB: out of the question responses, this is the closest to the policy change that occurred

62 CSJ analysis of DfE and SLC data: Student Loan Company, 2016, Financial support for students in higher education: England 2016 [Accessed via: www.gov.uk/government/statistics/financial-support-for-students-in-higher-education-england-2016], Table 3A (i), the cohort starting in 2012 eligible for full maintenance grant totalled 144,597 students

of income earning families on average take on £57,000 of debt, while students from the top 30 per cent borrow £43,000. This contrasts with the previous finance system where, according to the IFS, debt was “broadly flat across the parental earnings distribution”.⁶³

While debt aversion may not prevent participation at a certain price point (disadvantaged students may feel able to take on a certain level of debt to cover fees and maintenance), there are limits to how elastic this principle is for the very poorest individuals. And the maintenance loans available to students assume a level of parental contribution that is less realistic for the most disadvantaged families. There is also evidence that some highly disadvantaged students are more debt averse than their peers, and that this is likely to put them off higher education. In this context, the government should reinstate carefully targeted, means tested maintenance grants for those individuals.

⁶³ IFS, 2017, Higher Education funding in England: past, present and options for the future [Accessed via: www.ifs.org.uk/uploads/BN211.pdf], pg 17

chapter three

A third of state schools have in-house access coaches, with a clear tilt in favour of better-off pupils

One way to mitigate some of the obstacles outlined in Chapter 2 of this report would be to appoint in-house access specialists in disadvantaged schools. In the context of secondary schools, these specialists would perform a number of roles. They would provide pupils with tailored information and guidance on higher education; help broaden pupils' fields of vision regarding their options; forge good relationships with universities and build institutional knowledge about their different application processes and expectations; support pupils with the practicalities of admissions; and help broaden pupils' skills outside of the curriculum.

St Paul's independent school has 11 access specialists to support around 200 students, while two thirds of state schools have no such appointees.

Some schools already clearly see the value of these appointees. For example, the Outer London Boys, a state-maintained school, has appointed an advisor to help pupils write more robust personal statements; practise interview techniques; encourage take-up of extra-curricular activities; build confidence and aspiration; and offer pupils more guidance on the UCAS process.⁶⁴ Brampton Manor, an academy, has five access experts; last year, it saw 41 of its students (half of whom claim free school meals) receive places

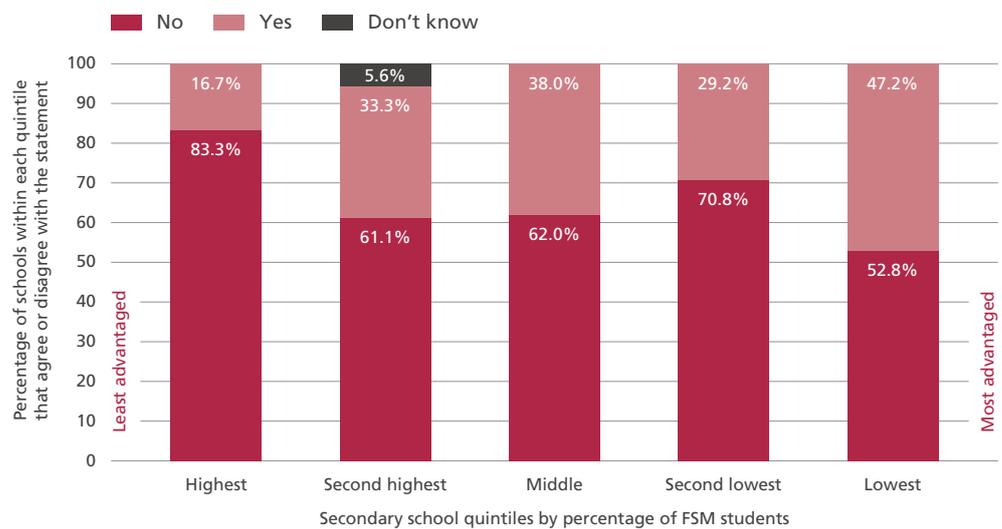
⁶⁴ DfE, 2014, School and college-level strategies to raise aspirations of high-achieving disadvantaged pupils to pursue higher education investigation: research brief [Accessed via: assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/278117/RR296_-School_and_College-level_Strategies_to_Raise_Aspirations_of_High-achieving_Disadvantaged_Pupils_to_Pursue_Higher_Education_Investigation.pdf], pg 75

at Oxbridge.⁶⁵ Top independent schools, too, appear to recognise the value of in-house specialists. At St Paul's School, each student is assigned an adviser in Year 11 and in total, the school has appointed 11 specialists to advise 200 pupils.⁶⁶

We wanted to learn more about the extent to which pupils had access to these dedicated specialists in state-maintained secondary schools across England. Where schools had not appointed higher education access experts, we wanted to know what was driving those outcomes. To find out, we commissioned the National Foundation for Educational Research (NFER) to carry out a survey of school leaders.⁶⁷ We outline below some of the major trends that flowed from our questions.

Q1: Does your school currently have one or more full-time member of staff whose sole role is to support pupils' access and progression to higher education? (Secondary schools, England)

Figure 4: Does your school currently have one or more full-time member of staff whose sole role is to support pupils' access and progression to higher education? (Secondary schools, England, by disadvantage)



Source: CSJ-commissioned polling (NFER).⁶⁸

65 The Guardian, 2019, London state school says 41 students offered Oxbridge place [Accessed via: www.theguardian.com/education/2019/jan/15/london-state-school-brampton-manor-41-students-offered-oxbridge-place]
 66 St Paul's school, Careers and Universities, [Available at: www.stpaulsschool.org.uk/st-pauls/academic/universities-and-careers]
 67 NFER, June 2019, Teacher Omnibus Survey (www.nfer.ac.uk/teachervoices). Responses were received from 1,570 practising teachers from 1,356 schools in the publicly funded sector in England. Teachers completed the survey online between the 21 and 26 June 2019
 68 NFER, June 2019, Teacher Omnibus Survey (www.nfer.ac.uk/teachervoices). Responses were received from 1,570 practising teachers from 1,356 schools in the publicly funded sector in England. Teachers completed the survey online between the 21 and 26 June 2019

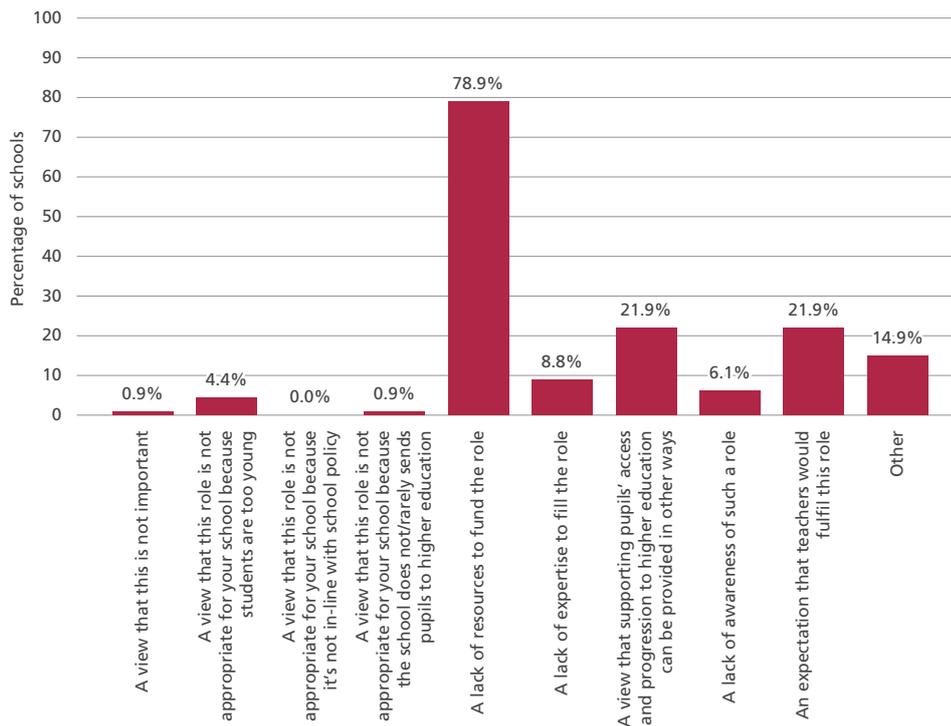
- One third of secondary schools had appointed a dedicated access expert whose sole purpose was to help with admissions to higher education institutions.

The most advantaged state secondary schools are nearly three times more likely to have appointed an access expert than the most disadvantaged state secondary schools.

- The most advantaged secondary schools (defined in terms of % FSM) were nearly three times more likely (47.2 per cent) to have appointed an access expert than the most disadvantaged schools (16.7 per cent).⁶⁹
- London’s secondary schools were the least likely in any region to appoint an expert (22.2 per cent). The next least likely were in the West Midlands, North West and South West.

Q2: Is the decision not to appoint staff with this ‘access expert’ role mainly driven by... (Secondary schools, England)

Figure 5: Is the decision not to appoint staff with this ‘access expert’ role mainly driven by... (Secondary schools, England)



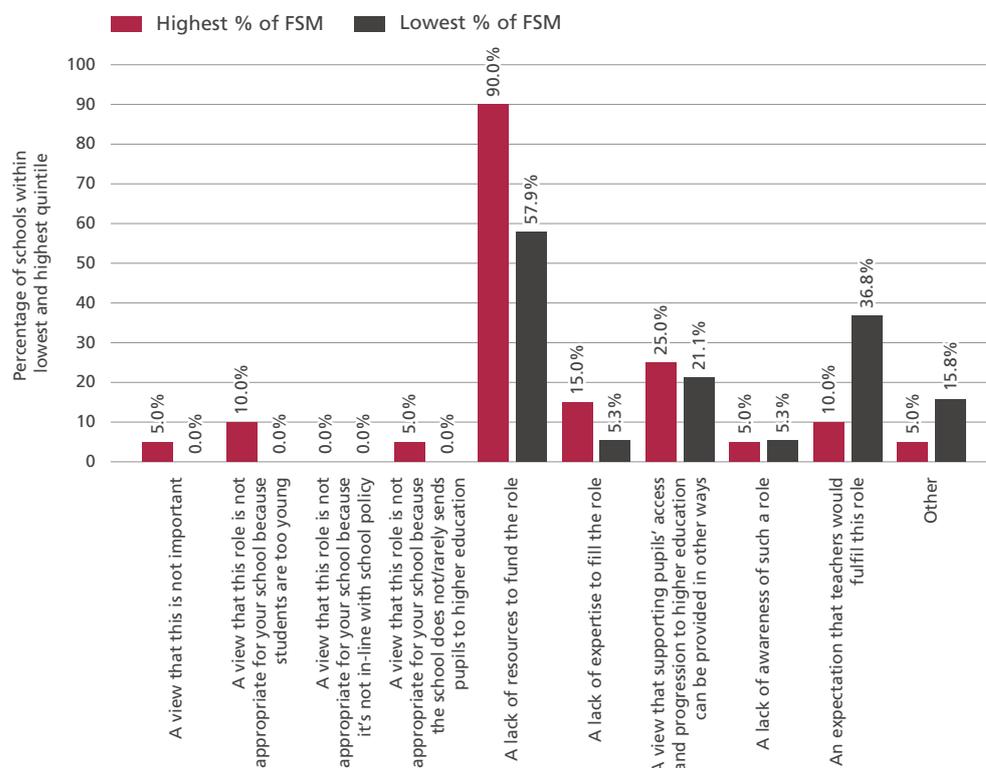
Source: CSJ-commissioned polling (NFER).⁷⁰

⁶⁹ The most disadvantaged schools are defined as the quintile of schools within the survey that had the highest proportion of students eligible for free school meals in 2016/17. The most advantaged are the opposite quintile

⁷⁰ NFER, June 2019, Teacher Omnibus Survey (www.nfer.ac.uk/teachervoice). Responses were received from 1,570 practising teachers from 1,356 schools in the publicly funded sector in England. Teachers completed the survey online between the 21 and 26 June 2019

- The three most prominent reasons for not having appointed an access expert in secondary schools were:
 - a lack of resources to fund this role (78.9 per cent of respondents cited this);
 - an expectation that teachers would perform such a role (21.9 per cent cited this); and
 - a view that supporting pupils' access and progression to higher education could be provided in other ways (21.9 per cent).
- Compared to respondents in more advantaged schools (defined in terms of % FSM), senior leaders from disadvantaged secondary schools were:
 - more likely to cite a lack of resources to fund the role as a barrier to appointing a specialist (90 per cent compared to 57.9 per cent); and
 - significantly less likely to say that teachers would fulfil this role (10 per cent compared to 36.8 per cent).
- Respondents in the Yorkshire and the Humber (100 per cent), and the East (92.9 per cent), were the most likely to cite a lack of resources to fund the role as a reason why they had not appointed an access expert. Respondents in the South East were most likely to say that they expected teachers to fulfil the role (46.2 per cent).

Figure 6: Is the decision not to appoint staff with this 'access expert' role mainly driven by... (Secondary schools, England, by disadvantage)



Source: CSJ-commissioned polling (NFER).⁷¹

71 NFER, June 2019, Teacher Omnibus Survey (www.nfer.ac.uk/teachervoices). Responses were received from 1,570 practising teachers from 1,356 schools in the publicly funded sector in England. Teachers completed the survey online between the 21 and 26 June 2019

chapter four

There is scope for more effective spending on access

Higher education institutions and the OfS already spend money on access and participation

A higher education institution (this includes universities, both public and private, and FE colleges that offer higher education courses) can only charge maximum tuition fees of £9,000 a year for full-time students if it produces an access and participation plan.⁷² In the absence of such a plan, it can charge £6,000.^{73,74} The purpose of such a plan is, in relation to underrepresented groups, to outline how institutions aim to broaden access, support student success, and help students progress into the labour market.⁷⁵ Providers spend an undetermined portion of revenue on meeting these targets, and each plan must be approved by the OfS. In 2017/18, 200 out of the 267 HEFCE-funded higher education institutions that offer undergraduate courses in England charged above the basic tuition fee and had these agreements in place.⁷⁶

Higher education institutions also allocate “other funding” to outreach. This might include, for instance, funds from charitable donations; spending above and beyond funds that are sourced from uplifts in tuition fees; or other Higher Education Funding Council for England (HEFCE) teaching grants.⁷⁷ And the OfS, too, spends funds on supporting disadvantaged pupils into higher education, for instance through the National Collaborative Outreach Programme, which costs £60 million a year to run.

72 This can rise to £9,250 if the university participates in the Teaching and Excellence Framework (TEF)

73 Or £6,165 if the university participates in the TEF

74 OfS, 2019, Fee limits [Accessed via: www.officeforstudents.org.uk/advice-and-guidance/promoting-equal-opportunities/access-and-participation-plans/fee-limits]

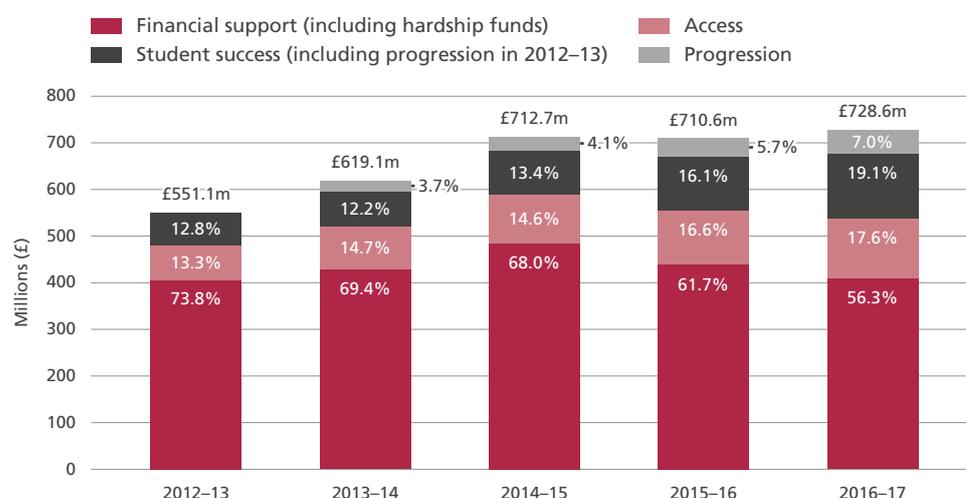
75 OfS, 2019, Process for submission and assessment [Accessed via: www.officeforstudents.org.uk/media/2c75e996-082e-4cbd-8b0b-5cb75796ba20/apps-processes-for-submission-and-assessment.pdf]

76 Office for Students, 2019, Monitoring data and outcomes: 2017-18 OFFA access agreements and HEFCE student premium funding [Accessed via: www.officeforstudents.org.uk/data-and-analysis/monitoring-data-and-outcomes-2017-18-access-agreements-and-student-premium-funding]. Note: HEFCE was replaced by the OfS in 2018.

77 OfS, 2019, Monitoring Outcomes [Accessed via: www.officeforstudents.org.uk/media/00065f84-f4fe-4df4-82c6-0b809f30b543/ofs2018_37.pdf], pg 4

In 2017/18, the combined access and participation budget for all institutions that had signed access and participation plans was £784.5 million, which includes the expenditure sourced from HEFCE contributions. There is no publicly available break-down of spending by specific type of activity. For instance, we do not know how many resources are channelled towards aspiration-building or attainment-raising activities. However, we do know how much is spent respectively on attempting to broaden access, financial support, helping students to succeed in their studies, and supporting students into the labour market. Figure 7 outlines the relative apportionment between these categories between 2012 and 2018 for higher education institutions with access agreements.

Figure 7: Expenditure on outreach in relation to higher education institutions that have access agreements (2012–2018)



Note: The 'total sums' in Figure 7 do not represent total expenditure on access and participation in each case because not all institutions have access agreements. Instead, they represent the total sum of money spent in relation to institutions that do have such agreements in place.

Source: OfS Monitoring Outcomes 2016/17.

New CSJ-commissioned research suggests that the schools most likely to benefit from outreach are the least likely to be approached

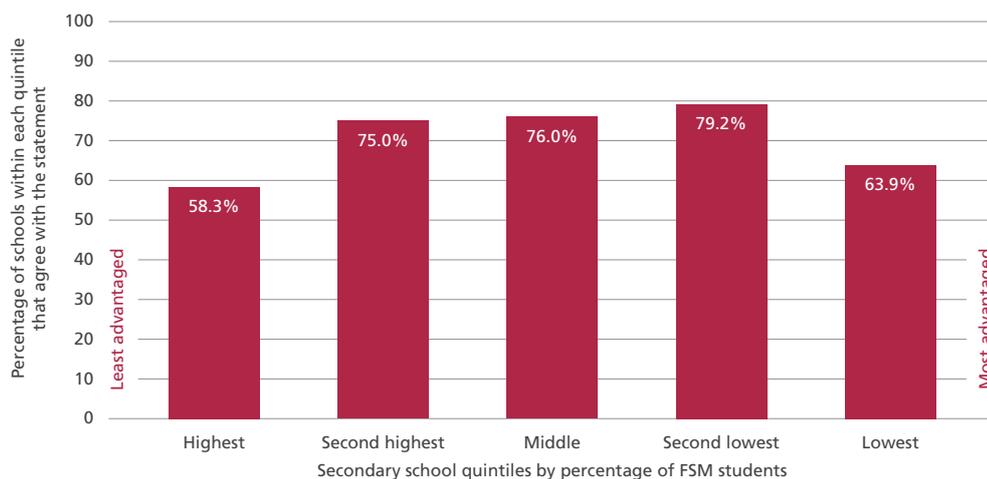
We wanted to learn more about the extent to which higher education institutions were reaching all schools in England, particularly those with the highest proportions of disadvantaged pupils. To find out, we commissioned NFER to carry out a survey of senior leaders in schools. The question we posed was: *Has your school been approached by a higher education institution for the purposes of outreach activity in the last six months?* We outline below some of the most dominant themes that flowed from respondents' answers.

Secondary schools

- More than one in six secondary schools were not approached by higher education institutions for the purposes of outreach activity in the six months prior to being surveyed.

- The most disadvantaged secondary schools were less likely to be approached than the most advantaged secondary schools: more than one in five of the most disadvantaged secondary schools were not approached.
- The overall proportion of secondary schools that were approached by higher institutions, split by each quintile of disadvantage, was as follows:

Figure 8: Has your school been approached by a higher education institution for the purpose of outreach activity in the last six months (secondary by % FSM)



Source: CSJ-commissioned polling (NFER).⁷⁸

- After London and the North East (55.6 per cent approached), Yorkshire and the Humber (61.5 per cent), and the North West (63.6 per cent) were the regions where secondary schools were least likely to have been approached.
- In some parts of the country, targeting was more effective than in others. For example:
 - in the North of England, schools were more likely to have been approached if they had a higher proportion of students eligible for free school meals; and
 - in Yorkshire and the Humber, and in the North East, none of the schools that were approached were the most advantaged schools (lowest quintile for percentage of students eligible for free school meals).

Primary schools

The research we commissioned also directed questions at senior leaders in primary schools. It is important to differentiate between the kind of work we mean in the context of primary school, and the support and advice that would be more relevant in a secondary context.

⁷⁸ NFER, June 2019, Teacher Omnibus Survey (www.nfer.ac.uk/teachervoices). Responses were received from 1,570 practising teachers from 1,356 schools in the publicly funded sector in England. Teachers completed the survey online between the 21 and 26 June 2019

Engagement at primary school level is less intensive than it is in the context of secondary schools. The former usually focuses on aspiration-raising activities and normalising the choice of going to university, particularly for pupils whose families have no prior history of higher education. IntoUniversity, a third sector organisation that helps disadvantaged children access higher education, reflects this role well. Its FOCUS programme, for instance, is geared towards Year 5 students and includes a day to introduce pupils to, and familiarise them with, the idea of university. For students in Year 6, IntoUniversity offers a FOCUS week, which includes trips to various places of learning (for instance museums or zoos) and full day visits to universities.

The reason it is important to have some sort of provision at primary level is that individuals start to frame their opportunities very early in life. Based on data from the UK's Millennium Cohort Study (MCS), researchers have calculated that at age 7, 91.5 per cent children "already have dreams or ambitions for future careers".⁷⁹ According to another study, disadvantaged girls were more likely to choose retail sales assistance and beauty therapist, whereas more advantaged girls were more likely to choose architects, engineers and vets.⁸⁰ What is also striking is that many of these early impressions tend to stick; one longitudinal study of primary school children⁸¹ shows that career aspirations in early childhood and early adulthood were strikingly similar. The problem here is not the nature of the jobs in question; we absolutely need retail assistants, just as much as we need architects, engineers, and vets. But what is concerning is the extent to which socioeconomic position appears to shape a pupil's field of vision, and it would be reassuring to see a blend of goals regardless of background.

We also know that early intervention in primary schools can be effective. In 2009–2010, the government funded seven pilots of careers education at primary school level, subsequently concluding that the pilots were successful in "increasing pupils' understanding of the link between education, qualifications and work opportunities."⁸² The DfE noted in separate qualitative work that "high-performing primary schools" focused on establishing high aspirations and expectations in relation to careers as early as possible.⁸³ 98 per cent of primary school teachers who engaged with IntoUniversity reported that their students had increased their knowledge of university, and 72 per cent believed that their students were more likely to go as a result.⁸⁴ And the Brilliant Club, which has a programme to support Year 4–6 pupils with skills-based learning tasks, reported that 64 per cent of its Year 6 participants wanted to go to university having completed its programme, compared to 52 per cent beforehand.⁸⁵

79 Moulton et al, 2015, Fantasy, unrealistic and uncertain aspirations and children's emotional and behavioural adjustment in primary school, *Longitudinal and Life Course Studies* 6(1) [Accessed via: www.researchgate.net/publication/276932604_Fantasy_unrealistic_and_uncertain_aspirations_and_childrens_emotional_and_behavioural_adjustment_in_primary_school], pg 117

80 Chambers et al, 2018, Drawing the future: exploring the career aspirations of primary school children from around the world [Accessed via: www.educationandemployers.org/wp-content/uploads/2018/01/Drawing-the-Future-FINAL-REPORT.pdf], pg 5

81 Ibid

82 DfE, 2010, Key Stage 2 career-related learning pathfinder evaluation [Accessed via: assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/182663/DFE-RR116.pdf], pg 3

83 DfE, 2018, School cultures and practices: supporting the attainment of disadvantaged pupils [Accessed via: assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/730628/London_Effect_Qual_Research_-_Research_Report_FINAL_v2.pdf], pg 26

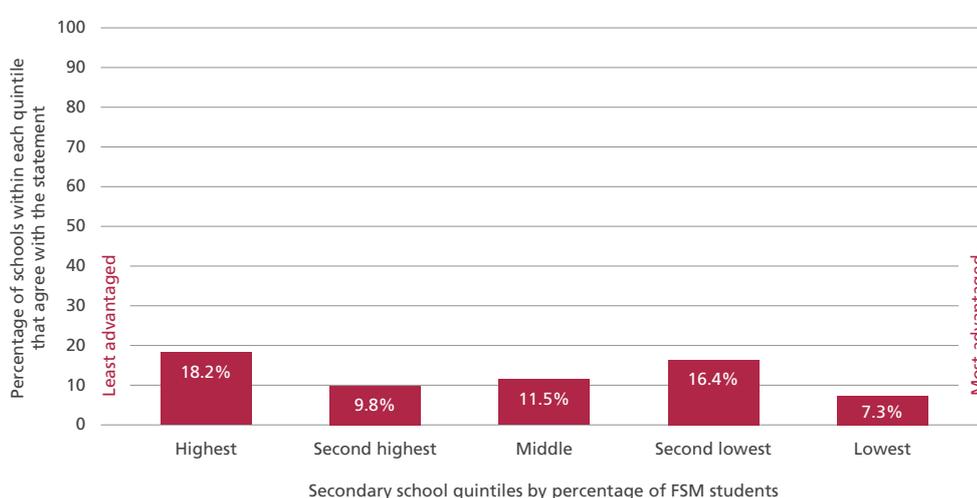
84 IntoUniversity, 2017, Impact Report [Accessed via: [intouniversity.org/sites/all/files/userfiles/files/IntoUniversity%20Impact%20Report%202017\(1\).pdf](http://intouniversity.org/sites/all/files/userfiles/files/IntoUniversity%20Impact%20Report%202017(1).pdf)], pg 25

85 The Brilliant Club, 2018, Examining the importance of early intervention in school widening participation practices [Accessed via: thebrilliantclub.org/examining-importance-early-intervention-school-widening-participation-practices]
NB: we do not know how long after the programme this questionnaire was given. We know that these interventions are usually less effective over time

With this in mind, we wanted to develop a better understanding of the extent to which higher education institutions had approached primary schools to support them with the types of activities we have outlined above. We set out below some of the most significant trends that flowed from respondents' answers.

- Almost eight out of ten primary schools had not been approached by a higher education institution for the purposes of outreach activity in the six months prior to being surveyed.
- However, unlike in secondary schools (where disadvantaged schools were less likely to have been approached than advantaged schools) primary schools in the most disadvantaged quintile were more likely to be approached than primary schools in any other quintile of disadvantage. 18.2 per cent of the most disadvantaged primary schools were approached, compared to 7.3 per cent of the least disadvantaged.

Figure 9: Has your school been approached by a higher education institution for the purpose of outreach activity in the last six months (primary schools by % FSM)



Source: CSJ-commissioned polling (NFER).⁸⁶

- More than a fifth of primary schools in the south West had been approached. This is more than double the rate of primary schools in Yorkshire and the Humber (9.5 per cent), and nearly triple the rate of primary schools in the West Midlands (7.1 per cent).

Not all initiatives aimed at improving access and participation are as effective as they should be

In the section above, we explained that not all schools (both primary and secondary) had been approached by a higher education institution for the purposes of outreach activity in equal proportion, and that the secondary schools most likely to gain from outreach were the least likely to have been approached. This is problematic in its own right but it

⁸⁶ NFER, June 2019, Teacher Omnibus Survey (www.nfer.ac.uk/teachervoices). Responses were received from 1,570 practising teachers from 1,356 schools in the publicly funded sector in England. Teachers completed the survey online between the 21 and 26 June 2019

is not the only problem that exists. As we outline below, although not indicative of the sector as a whole, not all higher education institutions are spending support funds as effectively as they might do.

Access agreements assessed by the OFFA pre-2018/19

The higher education regulator (the OfS and previously the OFFA) periodically evaluates these agreements. At the time of writing, the most recently available consolidated analysis was published by the OfS in 2019, which analysed agreements for the 2016/17 academic year when the OFFA was still the regulator.⁸⁷ (The OfS has recently published the sector investment tables for the 2017/18 academic year, but they do not include a consolidated database of individual institutional targets.) From that report and its associated data sets, we selected six universities (two random choices from low-tariff, medium-tariff and high-tariff brackets respectively) and scrutinised their targets. We identified a number of problems, a selection of which we outline below. The first point below (lack of progress) relates to the sector more generally.

Lack of progress

- Every year, institutions that have signed agreements must report the progress they have made in meeting relevant targets to the regulator. In 2016/17, only 32.8 per cent of all high-level outcome targets,⁸⁸ and 48 per cent of activity-based outcome targets, were met or exceeded in the previous four academic years. Activity targets focus on inputs, for example, summer schools or information campaigns; they usually focus on the number of students engaged or the number of events held. Outcome targets focus on the impact generated by particular activities.

Inadequate focus on underrepresented groups

- The OFFA (the OfS's predecessor) made it clear that no institution should focus purely on boosting the number of state school students it admits, without focusing specifically on disadvantaged individuals. However, several universities did this.
- Some institutions set themselves targets to improve in areas where they were already strongly represented, and without necessarily focusing on disadvantage. One institution, for example, said it aimed to increase state school applicants from 96.5 per cent to 98.5 per cent, without specifically targeting disadvantaged students in state schools.
- One university set itself a target simply to increase the percentage of all full-time undergraduates who progress into employment or further study.
- Another university's target was to "maintain a sector leading unemployment rate."

87 OfS, 2018, Monitoring Outcomes: OFFA access agreements and HEFCE funding for widening access for students from disadvantaged backgrounds, improving retention and improving provision for disabled students for 2016–17 [Accessed via: www.officeforstudents.org.uk/media/00065f84-f4fe-4df4-82c6-0b809f30b543/ofs2018_37.pdf]

88 Ibid, pg 10

Low ambition for underrepresented groups

- One university said it aimed to reduce drop-out rates among all students, from 10.1 per cent to 10 per cent in five years.
- Another institution set itself an access target for state school children which in effect was to maintain the level it had already achieved. Even then, the percentage of entrants fell by 0.5 per cent from the 2014/15 baseline measure, and this was reported as meeting a yearly milestone.
- One university said it would improve the flow of information to its students about bursaries, and would better monitor take-up, even though 100 per cent of students who were eligible for bursaries had already exercised this option.

Lack of focus on root causes

- Not all institutions focused on the most pertinent barriers to access, many of which we have outlined in Chapter 2 of this paper. Instead, they chose to target vague concepts, such as aspiration, which often work hand-in-hand with other factors.⁸⁹

Insufficient focus on continuous improvement

- For example, in 2012/13, one university set itself a four-year goal of delivering campus-based activity to 800 pupils. It subsequently met its goal within a year of having initially agreed it, having engaged 1,293 pupils in 2013/14. By 2016/17, this figure had dropped to 813. Despite this significant subsequent decline, the final outcome still exceeded its original target figure and was therefore categorised as a success.
- Institutions can sometimes meet targets well ahead of anticipated time (either because they have not aimed high enough or because they have made better than expected progress). Clearly, it is not possible to deliver everlasting growth in each designated direction of travel as there are natural limits to access-related targets. However, where targets are met in a shorter than anticipated timeframe, and where there is clearly further scope for growth, those targets should be re-evaluated dynamically rather than left for years to come as they were initially penned.

Incomplete/inaccurate reporting

- The regulator relies on good quality self-reported data to assess institution-level and sector-wide progress, and to therefore regulate appropriately. However, not all institutions provided it with robust data.
- According to the most recent publicly available self-assessment data, some institutions submitted incomplete returns. In some cases, institutions had not provided data for relevant targets. In other instances, the regulator identified errors in the information institutions had submitted.

89 HEPI, 2016, Making outreach work [Accessed via: www.hepi.ac.uk/2016/10/26/making-outreach-work]

- One university, for instance, set itself the target of increasing the number of students whose first degrees were part-time degrees. Although this figure subsequently fell below the baseline from which it was measuring progress, the institution reported that “no progress has been made against the baseline”, when in reality the figure in the final year had fallen below the baseline.

Absence of clarity

- One university’s measure of success, for instance, was the percentage of new entrants who had “benefited from participation.”⁹⁰

Access and participation plans for the academic year 2019/20

The information we outline in the section immediately above is drawn from the most recently available consolidated analysis of agreements at the time of writing; the OfS published this report in 2019 and it analysed agreements for the 2016/17 academic year. It is perfectly possible that providers might have since addressed problems that existed at that time. The government also appointed a new higher education regulator in 2018, with a mandate to improve the quality of outreach.⁹¹ (While OFFA presided over agreements for the 2018/19 academic year, the OfS oversees access and participation plans for 2019/20 and beyond, and although OFFA signed off agreements for 2019/20, they remain in force and are regulated by the OfS.)⁹²

With this in mind, we wanted to understand the extent to which the quality of targets had improved since 2016/17. Although investment summary data tables have been released, we are not aware of any publicly available consolidated spreadsheet of the 2017/18 access agreement targets. And the regulator’s next consolidated assessment of outcomes, which relates to the 2018/19 academic year, had not been released at the time of writing.⁹³ In the absence of this report (which, will help us learn more about the impact of the 2018/19 initiatives), we decided to scrutinise the plans for 2019/20 that had been put in place by the six universities we identified in the section immediately above. While this does not allow us to gauge their impact, it does give us the chance to analyse the integrity of the targets themselves, and the extent to which these institutions have redressed the issues we identified in the section immediately above. As we outline below, a significant number of issues persist.

Inadequate focus on underrepresented groups

- The original guidance on access and participation plans states that institutions should not focus solely on state school students, without focusing specifically on disadvantage.⁹⁴ Nevertheless, not all institutions adhere to these requirements.

90 OFFA, 2017, Outcomes of access agreement monitoring for 2015-16: Annex Data Tables [Accessed via: webarchive.nationalarchives.gov.uk/20171102110953/https://www.offa.org.uk/publications/analysis-data-and-progress-reports]

91 Department for Business, Innovation and Skills, 2016, Case for creation of the Office for Students [Accessed via: assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/527757/bis-16-292-ofs-case-for-creation.pdf], pg 7

92 OfS, 2019, How long do access and participation plans last? [Accessed via: www.officeforstudents.org.uk/advice-and-guidance/promoting-equal-opportunities/access-and-participation-plans]

93 OfS, 2019, Business plan 2019-2020 [Accessed via: www.officeforstudents.org.uk/media/81bbc5c7-8e89-4347-810a-62c1fdd56b9e/ofsbusiness-plan_2019-2020.pdf]

94 OfS, 2018, Regulatory Notice 1: Access and participation plan guidance for 2019-20 [Accessed via: www.officeforstudents.org.uk/media/1093/ofs2018_03.pdf], pg 28

- One university, for instance, set itself the target of recruiting a larger proportion of its students from state schools (from 93.4 per cent in 2013/14 to 94.2 per cent in 2018/19). While, as the university noted, its target figure is “greater than the England average,” it is not sufficiently focused on disadvantage, specifically. There are plenty of state school pupils who come from well-off families; in fact, just 14.1 per cent of children in state secondary schools are eligible for and claiming free school meals – a rough proxy for disadvantage in this country.⁹⁵

Low ambition for underrepresented groups

- In 2016/17, one university had set itself the goal of sending 625 volunteers a year into schools and colleges by 2019–20 (it is unclear from the information in the target database what they did). Although it exceeded this target in the same academic year (787 participants in 2016/17), it has now decided to set itself a relatively modest target (650 participants a year by 2021–22).

Questionable priorities

- One university sought to increase the number of first full-time degree entrants who completed their studies. It did this despite the fact that its baseline figure (5.6 per cent non-continuation rate) was already better than the national average for non-continuation rates.⁹⁶
- The same university is seeking to enlist a higher proportion of students from state schools, despite having an already higher than average baseline figure (95.3 per cent), and despite having already met its 2020/21 target in 2015/16.

Insufficient focus on continuous improvement

- The OfS places a strong emphasis on continuous improvement. But institutions do not always adhere to this notion in a meaningful way.
- For example, not all universities are using recent baseline data against which to compare their progress. One university, for example, set itself a goal to support more disadvantaged pupils into postgraduate taught courses. It used baseline data from 2011/12 (in that year, 5.3 per cent of its disadvantaged cohort moved into postgraduate taught courses) to benchmark its progress, despite the fact that in 2014/15, the same institution had exceeded that baseline figure by 3.4 per cent.
- Clearly, it is not possible to deliver everlasting growth in the designated direction of travel as there are natural limits to access-related targets. But where targets are met in a shorter than anticipated timeframe, and where there is clearly further scope for growth, those targets should be re-evaluated dynamically rather than left for years to come as they were initially penned.

95 DfE, 2019, Schools, Pupils and their characteristics: January 2019 [Accessed via: www.gov.uk/government/statistics/schools-pupils-and-their-characteristics-january-2019]

96 HESA, 2014, Summary – UK performance indicators 2013/14 [Accessed via: www.hesa.ac.uk/data-and-analysis/performance-indicators/summary/2013-14]

Access and participation plans (covering the period 2020/21–2024/25)

The OfS has made it clear that it wants access and participation targets to be more rigorous. Providers will now report on the impact they make each year, and will set out action plans to outline their next steps. They must target “year-on-year” improvement, include better evaluation tools, and achieve “sustained engagement” with likely recipients.⁹⁷ Institutions are now expected to set themselves more outcome-based targets, which will become the focus of the OfS’s scrutiny.⁹⁸ The OfS will take a fluid, risk-based approach to agreeing the timeframes within which providers are expected to meet their targets. The baseline data that universities use to benchmark their progress will need to be more recent. And the OfS has introduced a ‘what works’ centre (the Centre for Transforming Access and Student Outcomes in Higher Education), which will provide institutions with a platform for sharing best practice.⁹⁹

We strongly welcome these reforms, which will bring much-needed quality assurance to access initiatives. However, there are a number of outstanding problems. First, while universities were previously expected to spend at least 15 per cent of their tuition fee uplifts on access and participation, they now no longer need to do so. The OfS’s decision to focus more on outcomes, which we support, does not negate the need for an adequate resource base in the first place. As we saw from the NFER research we commissioned, for instance, a significant number of schools, particularly in disadvantaged areas, have not been approached by a higher education institution for the purpose of outreach activity in the six months prior to being surveyed. In this context, it makes sense to return to a system that obliges qualifying institutions to spend a minimum of their tuition fee uplifts on access and participation.

Second, it is not clear that outreach initiatives always provide the best value for money. For instance, it is estimated that, on average, universities spend £9,670 on each disadvantaged student who is successfully supported into higher education.¹⁰⁰ IntoUniversity, a third sector organisation that helps disadvantaged children access higher education, has calculated that it spends £5,600 to achieve the same goal.^{101,102} Even when adjusting for the total market value of volunteer hours the organisation draws upon (£675,000),¹⁰³ the net unit cost of success still only rises to around £6,700.¹⁰⁴ Third, while there is clearly a need for institutions (particular the more selective ones) to do all they reasonably can to improve access to their own courses, more general support should also be rewarded in context. A university-led summer school at a top university, for example, may not necessarily lead to all, or even any, of its participants getting places at that

97 OfS, 2018, Regulatory Notice 1: Access and participation plan guidance for 2019-20 [Accessed via: www.officeforstudents.org.uk/media/1093/ofS2018_03.pdf], para 114

98 OfS, 2018, A new approach to regulating access and participation in English higher education: consultation outcomes [Accessed via: www.officeforstudents.org.uk/media/546d1a52-5ba7-4d70-8ce7-c7a936aa3997/ofS2018_53.pdf]

99 OfS, 2019, Regulatory Notice 1 [Accessed via: www.officeforstudents.org.uk/media/0bcce522-df4b-4517-a4fd-101c2468444a/regulatory-notice-1-access-and-participation-plan-guidance.pdf], pg 22

100 IntoUniversity, 2019, Impact Report 2019 [Accessed via: [intouniversity.org/sites/all/files/userfiles/files/IU19009_IU_IMPACT_REPORT_2019_WEB_AW%20\(1\).pdf](http://intouniversity.org/sites/all/files/userfiles/files/IU19009_IU_IMPACT_REPORT_2019_WEB_AW%20(1).pdf)]

101 Ibid, pg 20–21

102 The consultancy IntoUniversity used (Social Finance) arrived at this figure by first identifying a sample of pupils who claimed free school meals and had meaningful engagement with IntoUniversity. It then subtracted from this figure the pupils who would have likely entered university anyway (an estimate based on POLAR3 data), which left 63 per cent of the original cohort. They calculated that 610 additional pupils had accessed higher education as a result of its programmes, at a cost of £3.4 million over three years

103 Ibid, pg 31

104 CSJ’s analysis using IntoUniversity data (Ibid)

particular institution, and yet would still be helpful if it prompted pupils to consider other strong options. The official guidance specifically refers to outcome targets that concentrate on “reducing the gaps in access, success, and progression for underrepresented groups among a provider’s own students.”¹⁰⁵ And although the OfS’s regulatory notice allows institutions some latitude to take a broader perspective, it is not clear how much weight it is prepared to attribute to broadening opportunity more generally.¹⁰⁶ The OfS should signal clearly to providers that it will recognise, and proactively reward, outreach that boosts access more broadly, and not just in relation to their particular institutions.

Fourth, it is hard to track the causal relationship between outreach initiatives and subsequent outcomes, and therefore the extent to which outreach is successful. Although we can, therefore, insist that universities focus more effectively on underrepresented groups; have continuous improvement in mind when setting themselves targets; are more ambitious for disadvantaged pupils; address the root causes of poor access more effectively; and report more accurately, it is hard to gauge which initiatives are working.

In any event, a broader problem exists. Even if the next wave of outreach initiatives is successful, it is far from certain that it will fully address all the barriers that disadvantaged pupils face. And where new initiatives do have some positive impact, it is possible that other initiatives may have achieved more. The questions we must ask ourselves are:

- is there a way to address a fuller range of the challenges that face underrepresented groups when it comes to accessing higher education; and
- is there a way to supplement, and improve the efficacy, of the positive outreach work that already exists?

In the next section of this report, we argue that there is a way to achieve these things.

¹⁰⁵ OfS, 2019, Regulatory Notice 1 [Accessed via: www.officeforstudents.org.uk/media/0bcce522-df4b-4517-a4fd-101c2468444a/regulatory-notice-1-access-and-participation-plan-guidance.pdf], pg 8

¹⁰⁶ *Ibid*, pg 23

chapter five

A new 'fair access fund' at no additional cost

From 'outside in' to 'inside out'

As we outline in Chapter 4 of this report, the OfS recognises that some of the targets that institutions set themselves are problematic. And it has taken a number of welcome steps to address the problems that exist.

However, it is far from clear that, even if fully realised, these changes will deliver maximum impact. Even a well-oiled, fully efficient machine is unlikely to have the reach and level of individual engagement that is necessary to really tackle some of the barriers outlined in this report. In this context, it makes sense to consider other ideas.

One way to refine the existing model would be to build into it an 'inside-out' element, which would run alongside the government's ongoing efforts to fine tune provider-led outreach. This would allow us to spend more time addressing barriers in schools themselves, by appointing in-house specialists who would be familiar with the day-to-day contexts of the pupils we are trying to support. It would also add nuance to our current 'outside-in' approach, which sometimes places an unrealistic onus on higher education institutions to solve all the barriers that exist.

The nature of a fair access fund

A small portion of the collective access and participation budget should be top-sliced to build a fair access fund. This should be piloted in the first instance, as we are not aware of any existing scientific impact assessments relating to access experts.

The fund could be used to recruit in-house higher education specialists in disadvantaged secondary schools. These specialists would provide pupils with tailored information and guidance on higher education; help broaden pupils' fields of vision regarding their options; forge strong relationships with universities and build institutional knowledge about their different application processes and expectations; support pupils with the practicalities of admissions; and help pupils broaden their skills outside of the curriculum.

The fund could also be used to help disadvantaged primary schools. This support would be different to the offer at secondary level. Specialists would help disadvantaged primary pupils tackle the limitations they already subconsciously place on themselves about their

options in life; increase their understanding of the link between education and work opportunities; and help them develop basic skills including communication, teamwork and confidence. We do not envisage a need for a permanent in-house presence; as we outline in Chapter 5 below, we see this instead as a less intensive, floating role.

The fund could also be tendered to third sector organisations, potentially on a payment-by-results basis, to deliver support at primary or secondary level. The aim would be, specifically, to support disadvantaged pupils in the ways we have outlined above. Some charities (for instance, IntoUniversity) already do these things well, so there is an existing pool of expertise to draw on.

Our proposed fund would address some of the major barriers that exist for disadvantaged pupils, in ways that are more realistically achieved at school level

1 Challenge

CSJ-commissioned research shows that just one third of secondary state schools have in-house access specialists, and that disadvantaged state schools are three times less likely to have them than more advantaged state schools.

Improvement

By allowing disadvantaged schools to recruit their own in-house specialists, the fund would help them emulate some of the support that their better-off peers routinely receive in their schools.

Access to clear, astute and impartial advice in secondary schools would also help offset some of the problems that arise from disadvantaged pupils' lack of access to good careers advice. It would also start to compensate for their lack of access to certain networks (and the resources, coaching and experiences that are associated with those networks) that can influence whether individuals have the confidence to apply; aim for selective institutions when their grades are strong; and are able to fine-tune soft skills that boost their applications.

According to the research we commissioned, half of schools that did not have access experts cited funding as a reason why they had not appointed such an individual – a rate that was also higher for disadvantaged schools than it was for more advantaged ones. Having access to our proposed fund would help nullify this factor for the most disadvantaged schools.

2 Challenge

According to CSJ-commissioned research, more than one in six state secondary schools were not approached by higher education institutions for the purposes of outreach activity in the six months prior to being surveyed, a figure that rises to one in five if we just consider the most disadvantaged state secondary schools.

Improvement

Currently, schools that would benefit most from engagement are the least likely to be approached. Our proposal insures against such an outcome: every pound invested in our proposed fund would flow to the schools that need the support most.

3 Challenge

Not all current outreach efforts are maximising disadvantaged individuals' chances of exploring their options in higher education.

Improvement

Higher education institutions can contribute to fair access in many important ways, but they cannot address all the barriers that exist. In addition, as we have demonstrated in this report, not all initiatives aimed at improving access and participation are as effective as they should be. And teachers have continued to raise concerns about the varying quality of outreach that exists.¹⁰⁷

By placing some of the existing resource-base for outreach closer to the individual, we would improve the range and depth of the support offered to disadvantaged pupils.

It is unrealistic to assume that more sporadic outreach can cover the same bases as an in-house specialist, whose job it is to understand the context, challenges and support needs of disadvantaged pupils at the individual level. Sustained, personalised initiatives would provide pupils with a different type of support. The evidence on mentoring, for instance, shows that sustained mentoring over time is more effective than piecemeal engagement or short mentoring stints.¹⁰⁸ Mentoring needs to involve more than a "positive role model" which, the evidence suggests, has "little or no impact for moderate cost."¹⁰⁹ It needs to be structured, and must offer pupils information, advice and guidance that is timely and accessible.¹¹⁰

Interventions are also more likely to work if they draw parental buy-in. According to one DfE study, the second biggest challenge facing disadvantaged students in the context of access to higher education (after financial concerns) is a lack of

107 OfS, 2019, Perceptions of higher education outreach and access activity [Accessed via: www.officeforstudents.org.uk/media/ddd39369-6072-4b11-b07d-8f3dfdf1da2a/perceptions-of-higher-education-outreach-and-access-activity.pdf]

108 For research on effective mentoring see: Careers and Enterprise Company, 2016, Effective Employer Mentoring, pg 14 [Accessed via: www.careersandenterprise.co.uk/sites/default/files/uploaded/effective_employer_mentoring_research_paper.pdf]

109 Education Endowment Foundation, Teaching and Learning Toolkit: mentoring [Accessed via: educationendowmentfoundation.org.uk/evidence-summaries/teaching-learning-toolkit/mentoring]

110 The Behavioural Insights Team have produced an informative guide to influencing behaviour, which focuses on the framework of EAST: easy, attractive, social, and timely [Accessed via: www.behaviouralinsights.co.uk/wp-content/uploads/2015/07/BIT-Publication-EAST_FA_WEB.pdf]

parental engagement.¹¹¹ And a recent qualitative report found that schools and colleges rarely engage parents in higher education outreach activity in which they involve their students.¹¹² In this context, it makes good sense to have a localised strategy that places access experts right at the heart of the interface between schools and parents.

4 Challenge

Disadvantaged pupils do not have the same social capital as their peers, and good quality careers advice in schools is scarce.

Improvement

An in-house specialist would be well placed to help mitigate these issues.

Access to clear, astute and impartial advice in secondary schools would help offset some of the problems that arise from disadvantaged pupils' lack of access to good careers advice. It would also start to compensate for their lack of access to certain networks (and the resources, coaching and experiences that are associated with those networks) that can influence whether individuals have the confidence to apply; aim for selective institutions when their grades are strong; and are able to fine-tune soft skills that boost their applications.

We know what a difference support can make. Even a letter from the DfE can help. As one pilot demonstrated, high-performing disadvantaged students who were sent letters debunking misconceptions about selective universities were subsequently more likely to apply to these universities.¹¹³ Just think what a permanent in-house specialist could achieve.

5 Challenge

On average, disadvantaged students perform considerably worse at school than their peers, which narrows their options when it comes to higher education.

Improvement

Poor attainment is a function of many complex factors that fall outside the remit of this paper. However, our proposed fund can play a supportive role in boosting attainment.

First, the relationship between attainment and aspiration is likely to be bidirectional. In other words, getting good grades encourages pupils to aim higher, but aiming high also prompts people to work hard and get better grades. And learning environments (which are influenced by social capital and advice) are likely to shape

111 DfE, 2014, School and College-level Strategies to Raise Aspirations of High-achieving Disadvantaged Pupils to Pursue Higher Education Investigation Research Brief [Accessed via: assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/278117/RR296_-_School_and_College-level_Strategies_to_Raise_Aspirations_of_High-achieving_Disadvantaged_Pupils_to_Pursue_Higher_Education_Investigation.pdf], pg 113

112 OfS, 2019, Perceptions of higher education outreach and access activity [Accessed via: www.officeforstudents.org.uk/media/ddd39369-6072-4b11-b07d-8f3dfdf1da2a/perceptions-of-higher-education-outreach-and-access-activity.pdf], pg 3

113 DfE, 2017, Encouraging people into university [Accessed via: assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/603737/Encouraging_people_into_university.pdf]

pupils' goals in the first place. An in-house specialist would be well placed to help pupils understand their options and formulate their goals, which would in turn prompt a more focused work ethic.

Our proposed fund would also allow disadvantaged schools to redirect resources to support attainment. For example, where higher education support roles are currently carried out by teachers (which is the case in 10 per cent of schools according to the NFER research we commissioned), the recruitment of in-house specialists would free up teachers' time to focus on boosting attainment instead; according to one recent OfS-commissioned report, some teachers spend a substantial amount of time working with higher education institutions to organise activities and carry out risk assessments.¹¹⁴ And as the DfE's analysis has shown, teachers' time is often stretched more generally and the department wants to remove unnecessary workload.¹¹⁵

6 Challenge

It is difficult to know what good access is. Part of the problem is the lack of existing scope to accurately attribute impact to activity.

Improvement

It is often hard to accurately evaluate the causal relationship between outreach initiatives and subsequent outcomes, particularly where interventions take place a long time before individuals finish school.¹¹⁶ First, the data that would help us to do this is not always available (according to DfE data, in 2014, fewer than 32 per cent of 11–18 schools monitored the number of applications disadvantaged pupils made to higher education institutions).¹¹⁷ Second, just because an institution has met certain targets, this is not necessarily attributable to its agency; it could, for instance, be the result of structural factors such as changes in government policy or better attainment. And third, methods commonly used to gauge impact (for example, pre/post questionnaires) are often prone to methodological problems (for instance, social desirability and imminence biases).

In-house specialists could help improve the quality of impact assessments by providing institutions with more reliable data. They could also help institutions target pupils who would benefit most from support, thereby helping to improve the quality of their access initiatives. And their data could help inform the work of the Centre for Transforming Access and Student Outcomes in Higher Education, a new platform for sharing best practice.

114 OfS, 2019, Perceptions of higher education outreach and access activity [Accessed via: www.officeforstudents.org.uk/media/ddd39369-6072-4b11-b07d-8f3dfdf1da2a/perceptions-of-higher-education-outreach-and-access-activity.pdf]

115 DfE, 2019, Reducing teacher workload [Accessed via: www.gov.uk/government/publications/reducing-teachers-workload/reducing-teachers-workload]

116 OfS, 2019, Understanding the evaluation of access and participation outreach interventions for under-16-year-olds [Accessed via: www.officeforstudents.org.uk/publications/understanding-the-evaluation-of-access-and-participation-outreach-interventions-for-under-16-year-olds]

117 DfE, 2014, School and College-level Strategies to Raise Aspirations of High-achieving Disadvantaged Pupils to Pursue Higher Education Investigation: Research Brief [Accessed via: assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/278123/RB296_-_School_and_College-level_Strategies_to_Raise_Aspirations_of_High-achieving_Disadvantaged_Pupils_to_Pursue_Higher_Education_Investigation.pdf], pg 131

Our proposed fund would complement and enhance existing measures aimed at improving access for disadvantaged students

Helping HEIs meet more stringent targets

The OfS has made it clear that it wants to add more rigour to access and participation targets. Providers will report on the impact they make each year, and will set out action plans to outline their next steps. They must target “year-on-year” improvement, include better evaluation tools, and achieve “sustained engagement” with likely recipients.¹¹⁸ Institutions are now expected to set themselves more outcome-based targets, which will become the focus of the OfS’s scrutiny.¹¹⁹ The OfS will take a fluid, risk-based approach to agreeing the timeframes within which providers are expected to meet their targets. The baseline data that universities use to benchmark their progress will be more recent. And the OfS has introduced a ‘what works’ centre (the Centre for Transforming Access and Student Outcomes in Higher Education), which will provide institutions with a platform for sharing best practice.¹²⁰

Newly appointed in-house specialists would be well placed to help higher education institutions meet their targets. They would, for instance, make it easier for them to identify, and engage with, the most disadvantaged schools (which, as the NFER research we commissioned suggests, is not always currently happening). And they would improve the efficacy of existing initiatives where schools are not currently fully engaged with those initiatives – in an evaluation report of pre-16 outreach, the OfS found that 19 per cent of institutions had problems “accessing data held by schools, particularly with respect to young people’s attainment or attendance records.”¹²¹

Helping to improve the National Collaborative Outreach Programme’s impact

The OfS introduced the National Collaborative Outreach Programme (NCOP) in the 2016/17 academic year. It brings together a national group of stakeholders, including FE colleges, charities and schools. It has 29 consortia, each in different parts of the country. One of its aims is to reduce duplication and cold spots in relation to university outreach.¹²² It uses Higher Education Funding Council for England data to identify areas where participation is unusually low based on GCSE performance. It then uses this data to determine where investment could be most effectively targeted.

An initial evaluation report suggested that the programme can only offer limited help to disadvantaged pupils without the active engagement of schools, and that stakeholders are sometimes not able to secure this. According to the same assessment, “a major barrier [was] that some schools and FECs [did] not have the time and resource to

118 OfS, 2018, Regulatory Notice 1: Access and participation plan guidance for 2019–20 [Accessed via: www.officeforstudents.org.uk/media/1093/ofS2018_03.pdf], para 114

119 OfS, 2018, A new approach to regulating access and participation in English higher education: consultation outcomes [Accessed via: www.officeforstudents.org.uk/media/546d1a52-5ba7-4d70-8ce7-c7a936aa3997/ofS2018_53.pdf]

120 OfS, 2019, Regulatory Notice 1: Access and participation plan guidance for 2019–20 [Accessed via: www.officeforstudents.org.uk/media/0bcce522-df4b-4517-a4fd-101c2468444a/regulatory-notice-1-access-and-participation-plan-guidance.pdf], pg 22

121 OfS, 2018, Understanding the evaluation of access and participation outreach interventions for under 16 year olds [Accessed via: www.officeforstudents.org.uk/media/a8ad5c94-7a33-4b53-8f09-824d0705f073/ofS2018_apevaluation.pdf], pg 22

122 OfS, 2018, National Collaborative Outreach Programme [Accessed via: www.officeforstudents.org.uk/advice-and-guidance/promoting-equal-opportunities/national-collaborative-outreach-programme-ncop/ncop-in-the-future]

prioritise and engage with NCOP,¹²³ and building new relationships with schools and FECs “was often” time-consuming.¹²⁴ According to a separate OfS-commissioned report, 18 per cent of higher education institutions “reported that schools were not sufficiently engaged with the outreach activity and subsequently undermined the efforts of HEP staff to evaluate with rigour.”¹²⁵

A recent OfS-commissioned report, which scrutinised the NCOP two years after its inception, outlines further challenges. For instance, it found that teachers’ and parents’ general awareness of NCOP was very low.¹²⁶ In addition, some schools were “not facilitating access to targeted learners for NCOP staff to allow them to deliver their work,” because they were concerned about the stigmatising effect of targeting specific individuals within schools; 31 per cent of the NCOP partnership staff surveyed for this report said they were aware of this, a figure that rose from 24 per cent the year before.¹²⁷

The same report also suggests that these problems are harming the NCOP’s ability to affect positive change. For example, 29 per cent of the NCOP partnership staff surveyed for this report thought either that the programme had not upskilled teachers to support targeted learners beyond the life of the programme (15 per cent), or neither agreed nor disagreed with this notion (14 per cent).¹²⁸

Dedicated in-house specialists would be well placed to address these problems, and in doing so would improve the programme’s efficacy. For example, they would be able make sure that schools engaged with the NCOP’s consortia more proactively. They could devote time and resources to working with consortia, the lack of which was identified in the OfS-commissioned impact analysis as a barrier to more constructive engagement. Because in-house access experts would serve entire schools in the most disadvantaged areas, there would be less risk of stigmatisation. And these experts would be able to build awareness of the programme in schools and among parents, which is currently low in both cases.

Helping disadvantaged students make the most of new digital tools

The DfE recently created two new digital tools, both of which aim to give pupils information about the returns associated with different courses and institutions. The two tools are Think Uni (an online application developed by AccessEd) and The Way Up (an online application developed by Profs, a tuition company, which simulates a range of graduate career paths).¹²⁹

123 CFE, BIT & Sheffield Hallam University, 2018, NCOP year one: executive summary [Accessed via: cfe.org.uk/app/uploads/2018/08/2018_ncopyear1exec.pdf]

124 OfS, 2018, National Collaborative Outreach Programme: the first year [Accessed via: www.officeforstudents.org.uk/media/2d64895c-74b8-4993-ac60-6bc65d14fe00/ofs2018_25.pdf], pg 22

125 OfS, 2018, Understanding the evaluation of access and participation outreach interventions for under 16 year olds [Accessed via: www.officeforstudents.org.uk/media/a8ad5c94-7a33-4b53-8f09-824d0705f073/ofs2018_apevaluation.pdf], pg 22

126 OfS, 2019, Perceptions of higher education outreach and access activity [Accessed via: www.officeforstudents.org.uk/media/ddd39369-6072-4b11-b07d-8f3dfdf1da2a/perceptions-of-higher-education-outreach-and-access-activity.pdf]

127 Ibid, pg 40.

128 CFE Research, Sheffield Hallam University and the Behavioural Insights Team, 2019, The National Collaborative Outreach Programme [Accessed via: www.officeforstudents.org.uk/media/2d55ab17-7108-4e1d-b883-6bf8d1504e72/ncop-end-of-phase-one-evaluation-report.pdf], pg 45–46. NB: this includes a survey of 23 out of the 29 partnerships

129 DfE, 2018, Winners announced for new student apps [Accessed via: www.gov.uk/government/news/winners-announced-for-new-student-apps]

As we outlined in Chapter 2 of this report, not all pupils are making informed decisions about their futures. However, it is well documented that simply making information free and easy to access does not always mean that it will be used. In fact, individuals who are most likely to benefit from better information are sometimes the least likely to access it.¹³⁰ In one trial, for instance, researchers developed a website to improve access to information about higher education.¹³¹ They then tested pupils' propensity to access this website in different scenarios, and found that pupils were more likely to use the website if they were prompted to do so. Even then, certain prompts were more effective than others; when researchers emailed students with information about the website, take-up increased by four per cent, whereas when teachers encouraged pupils to use the website, take-up rose by 16 per cent. The researchers also found that disadvantaged pupils were less likely to access the website than their peers.

In-house specialists would be well placed to help maximise the utility of online support tools. They could alert disadvantaged pupils to the existence of these tools, and help navigate them, all of which would support more informed decision-making.

Cost implications

To build an access fund, we propose top-slicing and redirecting a small portion of the existing expenditure on access and participation.

Worked example

Our modelled example below provides an illustration of the resources that might be unlocked at a particular price point, and what this would pay for. As we have already proposed in this report, some of the access fund could, instead, be used to enlist the support of third sector organisations like IntoUniversity.

Headlines

A fund worth £9.705m would pay for:

- 178 in-house specialists in secondary schools; and
- 146 floating roles at primary school level.

The reach of these specialists would be:

- 141 secondary schools; and
- 1,455 primary schools.

130 McGuigan, M., McNally, S., & Wyness, G, 2016, Student Awareness of Costs and Benefits of Educational Decisions: Effects of an Information Campaign, *Journal of Human Capital*, Volume 10, 4, pp. 482–519

131 *Ibid*, pg 491

Explanation: secondary schools

In January 2018, there were 3,436 state-funded secondary schools in England.¹³² We wanted to reach schools that displayed the highest levels of disadvantage, in a way that also factored in the size of different schools.¹³³ With this in mind, we devised three different categories of beneficiaries, which together account for the numbers outlined above:

- a. Category 1: We allocated one access expert to every secondary school whose population included two times the national average level of children who were eligible for free school meals (two-year weighted average).
- b. Category 2: We allocated an additional specialist to each school that passed the threshold in (a) but also had a higher than average number, in absolute terms, of students who were eligible for free school meals.¹³⁴ We did this because it would be difficult to justify allocating the same weight of resources to small and large schools that both had similarly high rates of disadvantage.
- c. Category 3: We also decided to allocate a specialist to each school that did not meet the percentage threshold outlined in (a), but nonetheless had an unusually high number of pupils, in absolute terms, who were eligible free school meals. We did this because we did not want to omit schools that had lower levels of disadvantage (in pure percentage terms) than the threshold outlined in (a), but nonetheless contained a high number of disadvantaged pupils (in absolute terms) by virtue of their large size.

Explanation: primary schools

In January 2018, there were 16,766 state-funded primary schools in England.¹³⁵ We wanted to reach schools with the highest levels of disadvantage. With this in mind, we used the same three different categories of beneficiaries (a to c above) as we did for secondary schools.

However, we changed one key variable when calculating our proposed distribution of resources in primary schools. As we have outlined in our report, we envisage different functions for specialists in primary and secondary schools. While a secondary school specialist would work full-time in one school, a primary school specialist would adopt a floating role among several schools (for the purposes of this worked example, we assumed a ratio of 1:10). In part, this is because there are many more primary schools than there are secondary schools, and because the average size of primary schools is smaller than secondary schools. But in any event, we do not believe it is necessary for a primary school specialist to spend all his/her time supporting one school.

¹³² DfE, Schools, pupils and their characteristics: January 2018 [Accessed via: www.gov.uk/government/statistics/schools-pupils-and-their-characteristics-january-2018]

¹³³ The funding for this initiative can come from any or a combination of the three sources of access spending: the government, the uplift in higher tuition fee income, or "other funding"

¹³⁴ The threshold was set at three times the average number of children in secondary schools with free school meals.

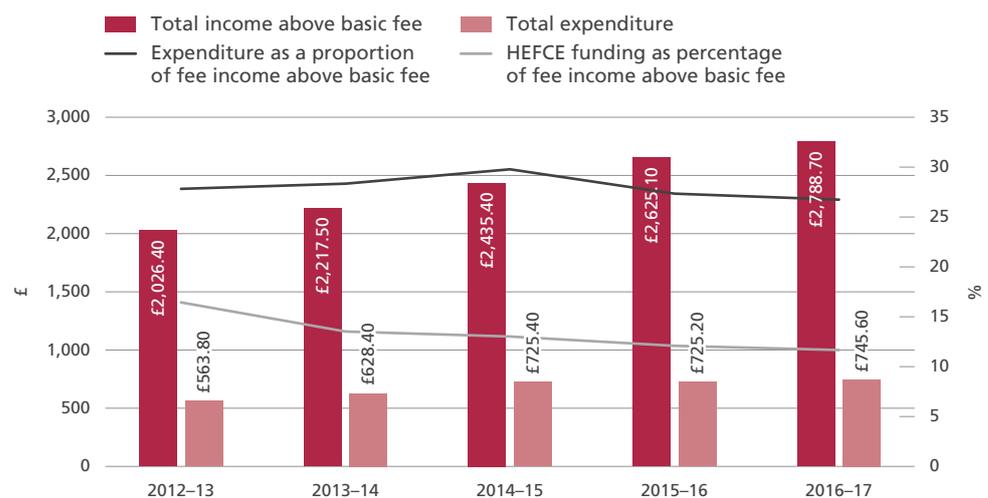
¹³⁵ DfE, Schools, pupils and their characteristics: January 2018 [Accessed via: www.gov.uk/government/statistics/schools-pupils-and-their-characteristics-january-2018]

Finding the money

A number of different revenue streams could be considered. First, if student numbers rise again, the funding available for access and participation would also grow, which would temper the financial burden of a top-slice. According to the OfS, the university population is projected to grow in the next four years.¹³⁶ Although this is not without qualification (a smaller 18-year-old cohort and potentially fewer EU students post-Brexit could affect growth), the sector expects strong growth in international students, and from 2021 the 18-year-old population in the UK is expected to “begin a sustained period of increase”.

If institutions were not able to pay for the fund through additional tuition fee revenue, they would only need to redirect a small sum from existing expenditure on outreach. In our worked example above, for instance, they would each need to identify £78,900, and contributions could be weighted so that smaller institutions were not disproportionately affected. It is also worth noting that, although institutions have recently spent more on outreach in absolute terms, the amount they have spent as a percentage of tuition fee revenue has actually been falling; Figure 10 demonstrates this point.

Figure 10: Tuition fee income and total access spend/access spend as a proportion of uplift in fee income (all institutions with access and participation agreements)¹³⁷



Source: CSJ analysis based on freedom of information request to the OfS.¹³⁸

If necessary, a portion of the government’s existing spending on outreach could also be redirected to help build the fund. However, as the light grey curve in Figure 10 illustrates, this type of funding has dropped and in 2016/17, it was £6 million lower than its peak in 2012/13. (The curve represents HEFCE’s expenditure on outreach in recent years; the OfS

136 OfS, 2019, Financial sustainability of higher education providers in England [Accessed via: www.officeforstudents.org.uk/media/cf54b6ee-714e-45c3-ade9-56bc685b861d/report-on-financial-sustainability-of-higher-education-providers-in-england.pdf], pg 17

137 NB: “other funding, which makes up part of the spending of universities a part of their access agreements, may also be made up from other HEFCE teaching funding that is not included in HEFCE WA, IR, IPDS (widening access, improving retention, and improving provision for disabled students). See: OfS, 2019, Monitoring Outcomes [Accessed via: www.officeforstudents.org.uk/media/00065f84-f4fe-4df4-82c6-0b809f30b543/ofs2018_37.pdf], pg 4

138 HEFCE 2012–2017, Monitoring Outcomes data sets [Accessed via an FOI request]

has since assumed this role).¹³⁹ In this context, the government would need to carefully consider the relative merits of existing projects when measured against a potential access fund, before deciding how much funding it could redirect.

¹³⁹ Ibid



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