



SPA briefing paper on admissions decision and offer-making for 2012 full-time undergraduate entry

October 2011

This briefing covers

1. Background on changes to student number controls in England and planning for the admission of 'Home' students
2. Summary of key HEFCE proposals for 2012 entry
3. Considerations for admissions
4. Free SPA surgery events w/c 31 October 2011

1. Background

Following the consultation exercise on teaching funding and student number controls (SNCs), HEFCE published information on 17 October providing details of its [new approach to implementing student number controls](#) in higher education (HE) in England from 2012-13.

[SPA's response to the consultation](#) provides background to wider concerns about fairness, some of which HEFCE have been able to accommodate within their need to provide an accurate prediction of funding liabilities.

The purpose of this briefing paper is not to debate or provide the detail of HEFCE policy, but to outline some of the changes admissions staff need to consider and to support HE providers in ensuring all applications are handled as fairly and consistently as possible during this period.

In addition institutions will wish to note that OFFA will be issuing new guidance about Access Agreements for 2012 in October. Details are **not** covered in this briefing but those HE providers attending the SPA surgeries in the first week in November (see section 4 at end of this briefing for details) will have the opportunity to discuss any implications for admissions decision making and internal processes at those surgeries.

Institutions will already have started receiving applications via UCAS for 2012 entry. In some cases they may already have received the majority of applications, particularly for courses using the 15 October deadline. However, all institutions with public funding will be considering how to manage the applications received before there is any confirmation of allocations from funders and any new structure for core, margin and exempted student number controls.

This issue predominantly affects HE providers operating in England, although all institutions recruiting students across the UK will be experiencing uncertainty during this challenging period of change in HE throughout the UK.

Our website information on [planning and managing admissions](#) provides general guidance and principles that are relevant for the current admissions cycle.

2. Summary of key HEFCE SNC proposals impacting upon 2012 entry admissions

▪ **Students exempted from SNC**

Applicants with results on HEFCE's AAB+ equivalencies list will be exempted from SNC. HE providers will be free to recruit as many of these students as they wish without affecting their SNC. HEFCE's AAB+ equivalencies list was devised with the need to accurately predict numbers and it is not intended as a comprehensive list of all qualifications suitable for entry to HE. The list from the consultation is still available in [annex C of the online consultation](#) but of particular note:

- The equivalent acceptable IB score has been raised to 35 points from the 28 points suggested in the original consultation
- Qualifications listed are only acceptable in the combinations and grades cited; there is absolutely no option to mix different qualification types (e.g. 2 A Levels and 1 BTEC National Award)
- Group awards that may contain a mixture of existing qualifications are not included (e.g. Advanced Diploma; Welsh Baccalaureate)
- Many qualifications that do not appear on the UCAS Tariff are not included (e.g. Access to HE Diploma; most non-UK qualifications; many vocational qualifications)

▪ **Core SNC allocation**

HEFCE will calculate this by firstly removing the predicted AAB+ equivalent population (based on each institution's population according to 2010/11 HESA records plus a predicted inflation in AAB+ attainment) and then an estimated additional 8% will be removed to create a margin.

- HEFCE will set a protected core of not less than 20% of the institution's SNC limit prior to removal of AAB+ equivalence students. This protects institutions that would otherwise be left with little or no core numbers and allows them to continue recruiting students not covered in AAB+ equivalencies (e.g. European students; contextual data modifications). There will be no change to HEFCE's total core allocation, so any additional numbers for individual institutions to provide the necessary protection will reduce the numbers available to be allocated elsewhere.

▪ **Margin SNC allocation**

The HEFCE policy is that all institutions will have a pro-rata reduction of around 8% that institutions charging average full-time fees of £7,500 or less may bid for. A call for bids and detailed criteria for re-allocating 20,000 margin places to HEFCE was issued on 17 October 2011.

- Institutions that did not submit an Access Agreement to OFFA (i.e. with fees of £6,000 or below) will also be included in the reductions to create a margin – this has changed from the suggestion in the original consultation that they be protected from the margin cuts. Instead, all institutions will have the first 50 of their SNC disregarded when calculating the margin, to mitigate the impact on small institutions.
- Numbers remaining on strategically important and vulnerable subjects (SIVS) after removal of AAB+ equivalencies will not be included in calculations to create a margin allocation. This reduces the impact on SIVS with high intakes of students with vocational qualifications not on HEFCE's equivalencies list or grades below the stated equivalence.

- **Opting out**

HEFCE has recognised that it may not be appropriate for all specialist institutions in the performing and creative arts that assess applicants on performance or portfolio to recruit freely from the AAB+ equivalent population and so cuts to their core allocation may unduly affect them. They believe larger institutions and ones with a wider spread of provision should be able to compensate for their specialist courses across their total allocation.

Such specialist providers (judged by HEFCE according to cost centre) may request to opt out of the proposed changes. This would mean they receive SNC from HEFCE that have not had AAB+ equivalencies or a margin reduction. However, such institutions would not then be allowed to bid for any additional margin places and any AAB+ equivalent students they enrol would count towards their SNC total.

- **Students counting towards SNC**

HEFCE have confirmed that all eligible students from England, Northern Ireland, Scotland, Wales and EU will be included in HEFCE's SNC and there are no significant changes to eligibility. Rules over ELQ students remain the same and SNC allocations for part-time and private providers have not been included this year.

- **Over and under shooting SNC**

HEFCE has not made a statement about whether or not it might need to reduce the number controls of institutions which under recruit. HEFCE has told SPA that there will not be fines for under recruitment. HEFCE recognises that there may be market effects that could not have been predicted/planned for this year and will include the approach to under-recruitment as part of their full response to the consultation in November.

3. Considerations for admissions – some points from SPA

All the points raised below are inexorably linked within the wider requirement to plan and manage numbers. It is therefore essential to consider how each point connects to others and that any change may have a cascading impact on remaining fair and managing numbers.

- **Setting targets**

The traditional admissions plan of recruiting to a single 'Home' target may no longer be appropriate under a system where significant numbers of funded Home students do not count towards the SNC. Institutions should bear in mind that the SNC excludes all accepted applicants meeting HEFCE's AAB+ equivalence, whether or not it includes qualifications/subjects used in the decision or offer-making process. This may be of particular relevance for example, on courses that do not consider General Studies, or any other subject, within its normal offer making but do have a high number of accepted applicants taking it alongside three other A Levels. A full course may not necessarily mean that SNCs have been met.

Institutions may consider:

- **Different Home targets**, based on exemption or non-exemption from SNC.

Distributing any physical course limit between these different targets may prove difficult to justify and may be seen as unfair to applicants and their advisors. It requires an upper limit to AAB+ equivalent students to ensure SNCs are met. Although many institutions will be familiar with using separate targets for home and overseas students, having separate targets (one for AAB+ and the other for all other Home students) would be decidedly different, as it involves discriminating between two groups who would both be eligible for a

HEFCE-funded place and who may both be suitable academically. It is therefore vital to ensure the grounds for discrimination are legitimate and robust against legal challenge.

Particular scenarios to consider before committing to different targets include:

- i) Would you reject well-qualified applicants who meet your entry criteria because you have met your SNC, but continue to offer places to applicants exempt from SNC (AAB+)?
 - ii) Would you reject well-qualified applicants who are exempt from SNC (AAB+) because the course is almost at capacity, but continue to offer places to applicants with non-AAB+ equivalent qualifications in order to meet your SNC?
 - iii) Would you reject an applicant for failing to meet HEFCE's criteria for exemption, even though that applicant may have qualifications that would otherwise meet requirements under a SNC target?
 - iv) How would you manage offers made under the SNC target that end up qualifying for exemption at Confirmation (e.g. exceed an ABB offer; have additional qualifications not considered as part of the offer) if accepting them would fill your course and leave you under your SNC?
 - v) How would you manage widening participation, contextual data, equality and access agreement commitments if a higher proportion of under-represented groups appear to fall under one target than the other?
- **A single Home target**, irrespective of exemption.

This may appear fairer to all applicants, particularly within institutions with low numbers of AAB+ equivalent students or ones where the standard offer is ABB or below. However, without a checking mechanism accounting for applicants who may become exempt from the SNC, institutions recruiting to a single target may find they meet that target but still fall short of their SNC. This may require institutions not previously concerned with collecting such data to keep closer scrutiny over the full range of qualifications each applicant is taking and not just the ones required for entry.

A particular scenario to consider before continuing with a single target would be:

- i) How would you manage offers that end up qualifying for exemption at Confirmation (e.g. exceed an ABB offer; have additional qualifications not considered as part of the offer) if accepting them would fill your course and leave you under your SNC?

Recommendation 1:

Institutions that have already started making offers under a single Home target should continue to use a single target for 2012 entry, to ensure all applicants are considered fairly. Institutions that have not started making offers may wish to consider whether or not to adopt different Home targets. If different targets are adopted, this should be clearly communicated to applicants and advisors and grounds for discriminating between applicants justified.

Recommendation 2:

Large institutions with flexibility to reallocate SNCs across a broad range of courses should plan to ensure there is capacity to do so should their most selective courses fill up at Confirmation with AAB+ equivalent acceptances whilst missing their target for SNCs. Smaller and more specialist institutions without such flexibility should analyse their risk of inadvertently filling their courses whilst missing their SNC and adjust their offer-making accordingly for all applicants.

▪ **Equal consideration**

SPA believe the concept of equal consideration may need to be reasserted within the context of the new HEFCE policy. It remains the case that applicants applying by the stated UCAS deadline (15 October; 15 January; 24 March) will be considered equally alongside all others in that period for the available funded places on the chosen course. Different targets, fast-tracking applicants with AAB+ predictions or placing additional requirements upon applicants not covered within HEFCE's AAB+ equivalencies list may mean that Home applicants covered by the principle of equal consideration may no longer be considered as one pool.

- Institutions with any uncertainty over how many places they will have or how many applicants will meet their criteria may wish to consider adopting a 'gathered field' to ensure all applications can be considered against the available places. If any applicants are offered a place before the equal consideration deadline, institutions should be sure they can demonstrate, if challenged, that the timing of their application did not affect their chance of being offered a place.
- Scenarios given under the 'setting targets' point above are of particular significance under any period of equal consideration as 'course full' cannot be used as a legitimate reason for rejection.
- Some courses may wish to close admissions to some applicants after the period of equal consideration. This may be because they have met their anticipated SNC but may wish to continue recruiting AAB+ equivalent applicants, or *vice versa*. Although UCAS has a system for closing courses based on Home or Overseas status, there is currently no such provision for this contingency. Without a mechanism for informing applicants of availability, it would be unfair to allow late applicants to waste a choice, or even all choices, on courses that are closed to their set of qualifications. Particular care should be taken for any course where there is evidence that a high proportion of late applicants come from low participation groups (e.g. mature) or who are unlikely to have access to additional advice and support in their applications (e.g. applicants not in school/college). Institutions should consider how they communicate any closure and how they would treat any applications made afterwards.

Recommendation 3:

Institutions need to provide reassurance to applicants and advisors that the principles of equal consideration will not be compromised by HEFCE's changes. Admissions, marketing, HE liaison and academic staff need to co-ordinate their message and approach throughout the admissions cycle.

Recommendation 4:

UCAS and member institutions should reconfirm a standard definition of equal consideration that takes account of HEFCE's changes whilst still acknowledging the wider context of Home students applying across the UK. Consistency and clarity in consideration will be paramount.

Recommendation 5:

UCAS and member institutions should agree a procedural mechanism whereby any Home student applying for a course after the period of equal consideration that is no longer considering their set of qualifications (either because they count towards, or are exempt from, SNC) can substitute their choice for an alternative. It would not be fair to reject applicants for reasons they could not have been aware of when they applied.

▪ **Decision/offer making**

Although not directly affecting institutional autonomy over whom to admit, SPA believes that HEFCE's policy will affect how applicants are considered for a place and how offers are phrased in order to ensure control over intakes counting towards SNC. In the vast majority of cases, entry criteria and standard offers have been published well in advance and applicants have made their choices based on that information. In a competitive environment where there are more applications than available places it is acceptable to adjust decision-making according to the quality and volume of applications. However, any such adjustment should be within reasonable expectations and not unduly disadvantage any particular group that would otherwise have been suitable for entry.

- Published entry criteria may contain many qualifications not included on HEFCE's AAB+ equivalencies list, so institutions will need to be clear about how such differences are viewed. If it becomes necessary that, because of HEFCE's changes, some criteria are considered as 'more suitable' than others, then this should be made clear to applicants and advisors as soon as possible through websites and other means. It would not be preferable to entirely drop qualifications deemed suitable for entry merely because they are not included in HEFCE's list, but institutions should be open and realistic if there is a more restricted number of places that can be offered to such applicants.
- Decision making should be applied consistently. This does not mean all offers have to be exactly the same, but some applicants should not be given different offers merely to allow greater control over their acceptance at Confirmation (e.g. making higher offers to those published on qualifications counting towards SNC whilst leaving ones on the AAB+ equivalencies list unchanged). It may be appropriate to phrase offers 'subject to meeting the AAB+ equivalencies published by HEFCE' only if such an offer could be applied consistently. However, institutions would need to ensure that such an offer is understood, that it clarifies any exclusions (e.g. if the course does not accept A Level General Studies) and it is not made inappropriately.
- The protected core of at least 20% will mean that even highly selective institutions will have some headroom for considering fair access and widening participation initiatives to those falling outside the AAB+ equivalencies. This will allow institutions wishing to apply contextual factors and possibly make lower offers to do so. However, applicants not viewed as disadvantaged (e.g. mainstream European applicants) may also need to be considered.
- If offers of AAB or equivalent are made specifically because such applicants would be exempt from SNC and there would be no option of leeway for near misses at Confirmation, it may be helpful to make this situation clear to applicants. This would remove ambiguity, particularly for course that have previously accepted near-misses, and may help applicants make more informed insurance choices.

Recommendation 6:

Institutions should clearly publish any changes to their entry criteria as a result of HEFCE's changes and co-ordinate communication via their HE liaison staff.

Recommendation 7:

Offers must be clearly worded and unambiguous.

4. Do you want to discuss this further? – SPA surgery events

Decisions made in admissions now will impact upon an institution's wider planning, financial position and on its management of confirmation. We appreciate that a comprehensive plan for approaching all the individual circumstances each HEI faces cannot be covered within this short briefing.

SPA are offering three free surgery events in Cheltenham on 31 October, 4 November and 7 November for HE staff from England and around the UK.

The surgeries will provide any updates on HEFCE student number controls and related topics, examine practical issues for 2012 entry and offer an opportunity for HE staff to network, share ideas and consult on their specific concerns. SPA staff will be available for one to one discussions in the afternoon. If you would like to attend one of these surgeries, please e-mail [Ruth Burchell](mailto:Ruth.Burchell@spa.ac.uk) as soon as possible. Places are limited, to ensure discussion time for all involved, so please list the dates you are able to make in order of preference.

If there is particularly high demand we will run an additional surgery later in November. We would consider holding surgeries elsewhere in the country if there is particular demand to discuss this topic at a regional, mission or specialist course level and an institution is willing to host the session.

Dan Shaffer

SPA