We are pleased to have the opportunity to respond to this consultation. The Supporting Professionalism in Admissions programme (SPA), is the UK-wide, objective and independent support for universities and colleges to enhance good practice, excellence and professionalism in the recruitment and selection of students to higher education. SPA promotes fair admissions by researching and disseminating good practice and advice across the HE sector. One of the key areas we work on is contextualised admissions and our latest research in this area has been well received and used by universities, colleges and academic researchers. We have also worked extensively across the sector to raise awareness of the principles of fair admissions (see below) and the risk of unconscious bias, and to support colleagues in developing strategies to address it.

SPA has a remit to work with HE providers in the UK on good practice and professionalism in how they recruit, select and admit students, and to support them in working to the principles of fair admissions which are:

1. be transparent
2. enable institutions to select students who are able to complete the course, as judged by their achievements and their potential
3. strive to use assessment methods that are reliable and valid
4. seek to minimise barriers for applicants
5. be professional in every aspect and underpinned by appropriate institutional structures and processes.

Many of the questions in this consultation are beyond SPA’s remit, so we have focused our response on questions 12 a), 12 b), and 13 a).

1 Contextualised Admissions: Examining the Evidence Report, 2013

SPA’s Use of Contextualised Admissions Survey Report 2015
www.spa.ac.uk/sites/default/files/Research-CA-Report-2012-full.pdf

Triangulation of contextual data: building a clearer picture of the individual applicant, September 2014
www.spa.ac.uk/sites/default/files/Briefing-contextualised-admissions-triangulation.pdf (all accessed 12 January 2016)

2 www.spa.ac.uk/resources/unconscious-bias (accessed 12 January 2016)
Q12 (a) Do you agree with the proposals to further improve access and success for students from disadvantaged backgrounds and black and minority ethnic (BME) backgrounds?

Not sure

SPA strongly supports the continued drive to widen the participation of students from disadvantaged backgrounds and those who are underrepresented in particular subjects and HE providers, and we see admissions as playing a vital role in this. We recognise that social mobility is an issue far wider than admission to higher education, but it is the point where the decision on whether or not the student is admitted is made. Admissions to higher education is increasingly complex, with consideration given to issues of consumer protection, qualification reform and the use of contextualised admissions to name but a few. Keeping policies and practices fair and easy for applicants to understand and HE providers to implement is crucial, and the success of this is down to the professionalism of those administrators, managers and academics involved in the process who are striving to improve and enhance what they do.

Unconscious bias and ‘name-blind’ applications

Widening participation and fair admissions for students from disadvantaged backgrounds, especially where the causes of low-participation are linked to protected characteristics, is key. However, any interventions that reduce transparency and deliberately obscure information need to be considered with great care. We are therefore unsure of the proportionality of some aspects of the proposals and would encourage careful consideration of their effectiveness.

SPA has long been raising awareness of what unconscious bias might mean for HE admissions, and working with HE providers to reduce the risk of bias in their processes. In our experience of the improved professionalism of admissions over the past ten years, we are confident staff take this issue seriously, strive to minimise barriers for applicants, and use consistent policies to drive diversity.

That said, it is positive to see this important issue being afforded further attention, especially as this raises awareness, and provides the HE community with the opportunity to share their own and reflect on others’ good practice. It is pleasing, for example, to see that a number of HE providers already provide unconscious bias training to admissions decision makers.

It is important to bear in mind that there will not be a ‘single solution’ for addressing the risk of unconscious bias in admissions. We would caution that this is an issue that requires further and thorough investigation before deciding whether ‘name-blind’ and/or any complementary initiatives should be implemented. We are pleased that UCAS’ consultation on this issue is in two stages, incorporating an evidence-gathering exercise first.

In order to support the HE sector in thinking through the implications of implementing ‘name-blind’ applications, we have produced a report. This is available at: [www.spa.ac.uk/resources/name-blind-applications](http://www.spa.ac.uk/resources/name-blind-applications)

The Government’s proposal draws an implicit link between staff recruitment and student recruitment. It is pleasing to see that contextualised approaches to the recruitment and selection of staff – similar to that of contextualised admissions in HE – are now being considered by some of the large employers, as referenced by the Prime Minister.

It is important to note, however, that there are significant differences between staff recruitment and student recruitment, and so we would caution that the practices (e.g. anonymised shortlisting) in staff recruitment cannot necessarily be transferred neatly to an admissions environment. For example, it is worth considering that:

- Unlike student recruitment, staff recruitment usually selects for a single, or very small number of vacancies.
Whereas an interview tends to be the final stage of the staff recruitment process, this is not the case in student recruitment where an interview makes up one element of the holistic assessment of an applicant, or, as in most cases, there is no interview at all.

Employers usually have human resource departments who administer the initial stages of staff recruitment, e.g. filtering applications. Admissions professionals may often undertake both the initial stages of applicant selection, filtering applications in the first instance, and the subsequent stages including offer-making.

In addition, the legal considerations for staff and student recruitment are significantly different.

While the Government’s interpretation of ‘name-blind’ is that ‘an applicant’s name would be hidden until such time as it needs to be revealed, e.g. to invite to interview’ – we have demonstrated in our report that the admissions process is complex, with multiple points of contact where the name itself, or other secondary information containing the name, is used.

With this in mind we have identified several unintended consequences and potential challenges in implementing a ‘name-blind’ approach to HE applications.

In particular:

- There is a risk that potential for making mistakes in offer-making may be higher without a name to refer to.
- Identity checks and verification, e.g. with regard to qualifications and visas, may be more challenging in a ‘name-blind’ environment.
- Compliance with consumer protection legislation where a name is not used, e.g. in any communications that are considered contractually binding, may be problematic and warrants further consideration.
- There is a clear impact of removing an applicant’s name on engagement with applicants – the perceived ‘friendliness’ and personalisation of written communications and other interactions. As well as being a marketing concern in a broad sense, this may be particularly of concern for HE providers seeking to engage with potential students from widening participation backgrounds who may already view higher education institutions as ‘intimidating’.
- There is a risk that contextualised admissions may be hampered. While much contextual information is not linked to an individual’s name, identifying whether an applicant has previously taken part in an HE provider’s outreach activities would be more difficult in a ‘name-blind’ environment. It could be to the applicant’s disadvantage if their involvement and success in the outreach activities was not considered as part of the holistic assessment because they were unidentifiable in a ‘name-blind’ system. This is clearly counter to the Government’s intentions behind the ‘name-blind’ proposal.
- As an overarching point, it seems unfeasible that applicants themselves will not use their names in the interactions they initiate.

We also identified two overarching potential benefits of ‘name-blind’ applications – assuming the above challenges could be overcome.

- Firstly, in line with the policy’s intentions, any risk of unconscious bias that is based on an applicant’s name, would be reduced (assuming a truly ‘name-blind’ application could be achieved). However, success may be difficult to measure as there is little evidence of extent and prevalence of this issue currently.
Secondly, it is possible that applicants may be more likely to declare support needs in a 'name-blind' application, where they might otherwise have been concerned about personal association or prejudice.

Should a move towards 'name-blind' higher education applications be made in future, it is important that the sector considers the risks and opportunities, and puts measures in place to reduce any negative unintended consequences.

SPA advocates that a good practice approach to tackling bias in admissions is for institutions to raise awareness of the risks internally, and to develop strategies, including training, to tackle these head on. As the UK’s independent programme for good practice in higher education admissions, SPA will keep abreast of developments in this area, and will continue to support HE providers.

Creation of Universities UK Social Mobility Advisory Group

As a member of the Practitioner’s Reference Group (a sub-group of the Universities UK Social Mobility Advisory Group) SPA will contribute views and share the evidence we have developed and collated in good practice and fair admissions. This will support the recommendations developed by the group. Higher education is a key driver for social mobility, and admissions plays an important role in facilitating this.

Q12 (b) Do you agree that the Office for Students should have the power to set targets where providers are failing to make progress?

No

It would be important to consider carefully any unintended consequences of this approach. For example, there may be a risk that, in striving to meet centrally imposed targets regarding the admission of certain groups of students, the principles of fair admissions could be compromised. In particular it would be vital that HE providers remain transparent, and select students who are able to complete the course, as judged by their achievements and their potential.

In addition we note that OFFA’s own response to the Green Paper does not advocate that the Office for Students should set targets. We agree that it is important for institutions to ‘own’ their targets, and that these should be tailored to an institution’s individual context.

We support the view set out in the Green Paper that institutions’ autonomy over admissions and academic freedom must be protected in a scenario where the remit of the new Office for Students was expanded to have the power to set targets.

Q13 (a) What potential benefits for decision and policy making in relation to improving access might arise from additional data being available?

Robust and timely data, especially individual-level data, is vital to enable higher education providers to develop evidence-based policies and practices in both widening participation and holistic admissions. While a lot of data is already available, much of this is at the aggregate level. This is helpful to a certain extent, but more should be done to unlock the potential of individual-level data.

Contextualised admissions

Contextualised admissions is defined as contextual information and contextual data used by universities and colleges to assess an applicant’s prior attainment and potential to succeed in higher education in the context of the circumstances in which their attainment has been obtained.

3 www.spa.ac.uk/resources/what-fair-admissions (accessed 12 January 2016)
Although entry to higher education is often determined by the type and strength of qualifications held by an applicant, these are by no means the only factors assessed when considering whether or not to make an applicant an offer of a place on an HE course.

Contextualised admissions in particular relies on robust data and information for it to be evidence-based, justifiable, valid and reliable in order to ensure it adds value not only to the admissions decision making process, but throughout the admissions cycle.

The diagram below shows how a range of data and information from the application and from other sources can be considered by HE providers as part of a contextualised admissions process. The support for applicants, e.g. care leavers, during the process, is important for improving confidence and ensuring a smooth transition into the student experience.

While data alone can never be a ‘silver bullet’ to improve access, the aim of using contextual information and data in admissions is to form a more complete picture of the characteristics of an individual applicant. The ‘gold standard’ will therefore be data that relates directly to the individual. However, the data that is actually available during the admissions cycle is often less granular, relating to the individual’s school or area/neighbourhood. Using this less granular data runs a risk: HE providers cannot be certain that the characteristics of the neighbourhood (for example) accurately reflect the disadvantage experienced by the individual. The aim of triangulation is to mitigate this risk by combining data from several sources about the individual applicant to reduce the likelihood of ‘false positives’.

Availability of individual-level data for contextualised admissions and widening participation purposes

Enabling institutions to track the individual students they have worked with in outreach and widening participation activities helps ensure they are fully considered within the admissions process, and indeed during transition into higher education and beyond. This helps HE providers to ensure students with the best potential to succeed are not missed, and helps develop policy and practice in this area for the future. Data and information used in admissions is drawn from a number of sources (see diagram above) but for a fully holistic picture of applicants, as

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7 SPA defines this as the ‘applicant experience’ [www.spa.ac.uk/resources/applicant-experience](http://www.spa.ac.uk/resources/applicant-experience) (accessed 12 January 2016)
recommended in the Schwartz report, *Fair Admissions to Higher Education* (2004), aggregate data or proxies for disadvantage are not sufficient. Our extensive research tells us that HE providers are keen to have access to more individual-level data when they are making admissions decisions8.

Free School Meal data can be used as an example to illustrate this issue. Free School Meal data – for an individual applicant – is not currently available to HE providers. Data available from the Department for Education via the free UCAS contextual data service only gives the percentage of students eligible for Free School Meals by school, and this data alone is inadequate to inform admissions decision-making. It would certainly be worth exploring further if there are additional, or more granular indicators that could be made available to HE providers, and one of the most effective ways of providing this would be via the UCAS contextual data service9. This needs to be appropriately and proportionately balanced with data protection considerations.

We are pleased that UCAS is taking steps to allow researchers to access to their data through the secure Administrative Data Research Network. Further research will help to inform policy and practice. We hope this provides an opportunity for researchers to take a collaborative approach to identifying additional contextual indicators, and refining the existing contextual information and data that could be used in widening participation and admissions.

More could be done to allow HE widening participation and admissions staff access to data that would help them to monitor progress, target interventions accordingly, and ultimately improve student outcomes. For example, HE providers cannot currently undertake in-cycle monitoring of the ethnic origin of applicants, because this data is not made available until after the student has been accepted (‘Unconditional Firm’ in UCAS terms). We welcome UCAS’ review of their admissions services, and are pleased that all the data collected via the UCAS application is within the scope of this review. We believe the time is right for discussion across the HE sector with regard to the application data requirements of HE providers. Indeed, this is something UCAS is already working on.

Collaboration between governments and the comparability of data

Furthermore, it must be remembered that HE providers recruit students from across the UK. SPA would like to see greater collaboration between governments across the UK to encourage more data to be made available to support targeting for widening participation and for use within contextualised and holistic admissions. It would be helpful if there was greater comparability of the data each administration and HE funder can provide for contextual data purposes, e.g. data and information which can act as an indicator for disadvantage, and schools data.

Over many years HE providers have developed ways of using qualification and other information on school performance to inform contextualised admissions. Extensive qualification reform across the UK will impact on the reliability and comparability of these measures. During this period of change HE providers would benefit from having more information from schools and colleges10 about the qualification offering to students, to help give more context to the applications they receive.

We would be happy to discuss these issues in greater depth.

Janet Graham, Director of SPA, Supporting Professionalism in Admissions Tel 01242 544891 or j.graham@spa.ac.uk. Rosehill, New Barn Lane, Cheltenham. GL52 3LZ.

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8 For example, our Scottish National Expert Think Tank on contextual admissions investigated the data needs of institutions. See: www.spa.ac.uk/resources/spas-work-contextualised-admissions (accessed 12 January 2016)

9 For information on the existing ‘basket’ of contextual information and data available via UCAS, see: www.spa.ac.uk/sites/default/files/Briefing-UCAS-contextual-data-service.pdf (accessed 12 January 2016)

10 See footnote 8 above.