

PE2009/N: Ensure fair access to Scottish universities for all residents in Scotland and the UK

Universities Scotland submission, 23 April 2024

Thank you for your letter dated 19 March regarding petition PE 2009. In preparing our response, we have consulted with our Admissions Policy Group, which draws its membership from senior admissions professionals across a wide representation of Scotland's universities. We have summarised information on existing data sources, which we hope supports your enquiries, letter in an annex.

We would also like to make three broad contextual points which are relevant to the petition and the information we have supplied.

The first point is to be clear that the number of funded undergraduate places available to Scottish-domiciled applicants for academic year 2024/25 sits above the pre-pandemic, high watermark level. The Scottish Funding Council confirms this in its [indicative funding allocations for universities](#), as published on 18 April. In 2024/25 there will be 119,540.2 non-controlled funded places available to Scots, compared to 107,982.0 non-controlled places in 2019/20, as the last year before the pandemic¹. This wide availability of places is reflected in a high proportion of accepted applicants into Scottish universities. In 2023, 75.7% of Scottish applicants were at university at the start of term, which is the highest proportion in the last ten years.²

It is important to set out the data on funded places, as relevant to this petition, as there is a public narrative emerging that Scotland has a problem regarding the total number of funded places available for Scottish-domiciled students. The data shows that this is not the case, and we are keen to take this opportunity to share information with the Committee to ensure that misleading narratives do not take hold and serve to deter applicants. Scotland has a far more acute problem in regard to the scale of underinvestment made in every Scottish domiciled place than the total number of places available, relative to overall demand from Scottish students. We expand on this below.

Secondly, universities are deeply committed to fairness in admissions policies. Scotland's universities adhere to two admissions codes. They are:

- The Universities UK [Fair Admissions Code of Practice](#) (2022)
- The Universities Scotland [Guarantee of Fairness](#) (2019)

Transparency and the need for institutions to protect applicants' interests are core to both codes. Therefore, we understand the Committee's perspective and in principle support, the exploration of how data might contribute to greater transparency and insight for applicants.

¹ Scottish Funding Council Final Funding Allocations. Annex B Funded Places

² UCAS data for the 2023 (2023/24) entry cycle

Our final, contextual point relates to universities' commitment to widening access and the need to ensure that developments in this area are made in a way that continues to support students from underrepresented backgrounds into higher education. Scotland is proud to have introduced the most progressive admissions policies in the UK, with the aim of widening access. The use of contextual admissions and minimum entry requirements for applicants with contextual flags, is key to progress with this agenda. However, this adds a level of complexity to entry requirements which would need to be captured and reflected in any student-facing data on admissions and entry criteria, so that the applicants who are intended to benefit from the contextualised admissions process are not misinformed.

Other factors highly relevant to supporting student choice

We appreciate the Committee's letter is focused on the added benefit that data in particular might bring to applicants, however we think there are other, highly relevant factors to mention in students' interests:

- The availability of good careers advice to Scottish pupils (and adult returners to education) is essential so they are informed about subject choices and how to build their path to university. It is also important they are informed about different routes into education, recognising that not all learners take a linear route from school and that universities support multiple diverse routes. Careers advice to school pupils (which should include advice on how best to achieve career aspirations) is severely under-funded and this is problematic when informing and supporting students.
- Funding levels for education, both at a school and university level are crucial in this space. Without adequate funding, schools may be forced to make difficult choices to deprioritise Higher and Advanced Higher provision in costly or lower-demand STEM subjects, modern languages and performing arts, which then limits onwards progression opportunities for students. This is likely to be more acute in remote and rural areas and areas of deprivation.
- At university level, the Scottish Government's budget decisions have led to a decade of erosion of the real-terms value of the teaching grant. This means the amount of public funding the Government invests per student has fallen by 39% in the 9 years between 2014/5 and 2023/24. This figure does not include universities' settlement for AY 2024/25. This funding situation will inevitably have an impact on the viability of certain courses, which would limit student choice and opportunity as well as the wider student experience universities are able to provide. The consequences of such funding pressures are likely to be accelerated if the decline in the number of international students coming to Scotland becomes an established pattern beyond one year. So far, international student demand for places and the cross-subsidy that has been possible from their fees (in most institutions) has been essential to the protection of choice, and high quality, for Scottish university students.

I hope this response, and the detail in the annex, has been helpful to the Committee's ongoing work in relation to the petition.

Annex

Suggestion for publication of data at a course and institution level on the number of Scottish-domiciled accepted students

The data that the Committee is interested in, regarding numbers of Scottish-domiciled students by course/institution is collected by the admissions body, UCAS, and by the Higher Education Statistics Agency (HESA) and could, theoretically, be published without the need for new data collections. Although it is important to note that HESA uses a subject coding system (HECoS) which is incredibly detailed with over 1,092 subject terms in its vocabulary, rather than by course.

However, we are of the view that data alone, without wider contextual information will not provide potential applicants with enough to make informed choices, in their best interests.

To be of most use to applicants, we are of the view that data on the **offer rate** to Scottish-domiciled applicants would be of more value than data on student enrolments (available from HESA) or the acceptance rate or entry rate. As the objective is to help inform student choice, the relevant factor for an applicant is how many offers (or opportunities for study) are made to Scottish-domiciled applicants on a course-by-course basis. Thereafter, student choice (as well as student attainment) becomes a factor in the eventual progression into higher education. A Scottish-domiciled student may receive multiple offers to study in Scotland but will only select one of them – or they may choose to study at an institution in England or Wales, take a gap-year or go into employment.

Further, data on the offer rate by subject level is of limited value to an applicant unless there is additional information on average entry qualifications or tariff scores which helps that individual to situate themselves in the data and assess their likelihood of being offered a place based on their own actual or projected grades relative to the average from recent years.

We are particularly concerned that any additional data does not unintentionally discourage applicants from widening access backgrounds. As referenced above, Scottish universities set minimum entry requirements (with grade adjustments) for students from widening access backgrounds. Minimum entry requirements recognise the barriers these students may have faced and that their academic grades may not reflect their academic potential. It is therefore important that any data published to inform student choice, with intention of maximising opportunity, includes appropriate contextual information.

Existing relevant data sources

As the Committee considers this further, we'd like to point the Committee to two existing data sources that could be of interest. Neither currently deliver exactly what the Committee is looking for, but further exploration of these data sets might help to move toward what is valuable and necessary, whilst avoiding duplication.

- **Discover Uni.** <https://discoveruni.gov.uk/>

This is a student-focused resource, which is supported by the Scottish Funding Council, the Office for Students (in England) and the funding bodies in Wales and Northern Ireland. It offers a fully searchable platform with information available at an institution and course level, including the profile of UCAS tariff points as achieved by entrants to that course based on recent years. By way of illustration, a search for a forensic science undergraduate degree at University X, might provide information that over 60% of recent successful entrants to that course held more than 159 tariff points. The platform user can then compare that information with their own projected academic attainment to decide whether to apply. They can also compare that average grade profile with that of other forensic science degrees in other institutions.

One limitation, in so far as the Committee's interest, is that we are not aware that Discover Uni offers anyway for an applicant to filter this data by domicile of applicant. The ability to narrow the data set to focus on average tariff attainment of successful Scottish domiciled entrants is relevant in the context of a fixed number of funded places in Scotland's model of full-time undergraduate education. Without it, the data could mislead a Scottish applicant.

We are also unclear if Discover Uni includes information on subject specific requirements for entry, beyond grade-based information (so in the case of an applicant to a forensics degree, it might be a further requirement for applicants to hold at least one science and a maths qualification, as well as meet certain grade requirements for example).

At present, Discover Uni is unable to provide the level of detail necessary to inform Scottish applicants who might benefit from contextualised admissions and minimum entry requirements, in support of the widening access agenda.

- **UCAS data project focused on grades on entry.**

Later this year, UCAS expects to launch a new pilot project aimed at helping to inform student choice. The project will publish data about students' grades on entry and is UK wide in scope, so it will include Scottish providers, but it will only track and publish data on the grades on entry to university where the applicants have A-levels. In practice, this means that very few state school Scottish-domiciled applicants are likely to be covered within the scope of the pilot.

As we understand it, the aims of this project align closely to the Committee's stated aims. UCAS believes this project will be of value to applicants because it will allow an applicant to assess how their actual/projected attainment compares to the average grade level achieved where offers are made/offers are accepted. In recent years, the competition to recruit students in English universities has been intense and some institutions have accepted applicants with grades below their advertised entry requirements. The UCAS pilot is intended to address a scenario in England whereby a university's published entry requirements state a tariff score of 180 for entry but, the average grade attainment of offer holders in recent years sits below this, at 159. If an applicant has access to the data about the average 159 score for offer holders, they may consider applying where they know they are predicted to get a tariff score of less than 180 points.

There has been some discussion between UCAS and the sector in Scotland during the development stage of this pilot. However, as it stands, we are of the view that there are several significant differences in the Scottish school and university sector which mean the project is not easily replicable in Scotland. In addition to the important widening access points made above, Scottish applicants typically apply to university with a much broader spectrum of qualifications and much greater variability in the number of qualifications than applicants in England, which has a much more standardised requirement of 3 A-levels (with some exceptions). In Scotland, applicants routinely apply with a mix of Highers, Advanced Highers, Higher Nationals (for students articulating from college) and the sector is very supportive of retaining and promoting a multitude of routes into university. It is much more challenging to present data on grades on entry across this spectrum of entry qualifications in a meaningful way and it would need a lot more development and testing for Scottish institutions to be confident to progress to an equivalent pilot based on Scottish qualifications.

We will follow UCAS's pilot with interest and remain in close touch with UCAS, Universities UK and institutions in England as to their experience. We are very interested to learn how this is received and used by applicants and UCAS's evaluation of the pilot.

We think there is merit in exploring the limits of the existing data sources, and learning from the UCAS pilot, to determine what might be of most use to Scottish applicants.