



POLICY BRIEFING

The regressive consequences of a minimum entry tariff

Supplementary evidence to the Review of Post-18 Education and Funding

The regressive consequences of a minimum entry tariff

KEY POINTS

- Establishing a number cap by introducing a minimum entry tariff will have a deeply harmful effect on the UK higher education sector and prospective students
- Steps to introduce minimum tariff thresholds would cut off some socially disadvantaged students from access to a phase of education that is associated with narrowing attainment gaps
- A minimum entry tariff could have perverse consequences on other stated objectives of the Office for Students (OfS) or the government, by reducing universities' capacity to recruit students from low-participation areas in the country
- If a minimum entry tariff was introduced, it could have a harmful impact on the accessibility of university study for mature students

Introduction

1. The Review of Higher Education Funding and Student Finance (aka the Browne Review) in 2010 considered the possibility of setting a minimum tariff requirement as a condition of entry onto a university course. Some consultees to the current Review of Post-18 Education and Funding have proposed that something close to the Browne proposals be adopted as panel recommendations to the government. Recent media speculation has also suggested that a recommendation on minimum grade attainment may be one outcome of the review, with students receiving grades below a threshold being denied a full choice over their next destination of education. The proposals that were outlined in the Browne Review were never adopted for a mixture of reasons, not least because it was perceived as a de facto cap on student numbers, and consequently a cap on aspiration that would be uneven and unjust in its application between social groups.
2. After rigorous debate on the subject, a consensus was reached both in the sector and in Westminster, that a cap on numbers taking no account of the context or background of students would put the brakes on social mobility and could even contribute towards worsening inequality between different groups in society. This argument still applies.
3. It impacts disproportionately on the most disadvantaged, means university entry criteria becomes driven by the Treasury and the ability to progress to higher education becomes based on past performance in a very different environment – this is morally wrong and not supported by the [evidence](#) for success at university.
4. Any move to impose such a minimum entry tariff, creating an effective cap on numbers in the sector, would appear not only to be an act of collective memory loss on the part of politicians, but also a spectacular own goal vis-à-vis the government's stated aims regarding social mobility and the "burning injustices" within the country.
5. Modern universities have for many years played a pivotal role in the UK with regards to social mobility, increasing participation in higher education (HE) and widening access to people from some of the most disadvantaged backgrounds in society.
6. Imposing a minimum entry tariff based purely on school grades or UCAS point equivalence will undo much of the important work that has been carried out by the university sector in this regard. Such a policy would act as an unnecessary and arbitrary barrier for many would-be students, limiting their ability to develop and progress in life, and preventing them from realising their full potential as contributors to the economy and society.

7. It would be wholly misguided to assume that a minimum entry tariff would be an effective way to identify students with limited interest in higher education. The vast majority of those who apply for university with an academic record that is below any threshold that could be implemented will have thought hard about the decision to engage with higher education. Indeed, many are doing so to correct some of the mistakes they may have made during their school education and are making the decision as an independent adult with a greater perspective on life and more focused priorities.
8. These students have been failed once and are fully deserving of a second chance at educational success. The term "left-behind" has become ubiquitous in mainstream political discourse since the referendum of 2016. It should be remembered that investment in "left-behind learners" is just as important a component of any agenda for greater regional equality as investment in "left behind communities" through an industrial strategy. There is no sense in creating a demand for skilled workers without a supply of graduates to complement it. Further use of the term, without a concurrent and firm commitment to invest in education in these communities, renders the approach, and its jargon, meaningless.
9. This paper focuses predominantly on two areas in which a minimum entry tariff would have detrimental effects on the capacity of higher education to educate people in England, and the unique power of the sector to create opportunities for those who have odds stacked against them. The first part focuses on how higher education can mitigate or even lead to a reversal in the gaping differences in attainment that exist between different socioeconomic groups at school. The second part argues in favour of supporting older learners to access higher education and explains how imposing a minimum entry tariff could have a disastrous effect on the mature student population in England.

THE CATCH-UP EFFECT: HIGHER EDUCATION AS A UNIQUE SPACE FOR SOCIALLY DISADVANTAGED GROUPS

10. Higher education provides an opportunity for less advantaged groups, with lower prior attainment on university entry, to catch up in their qualification attainment relative to more advantaged groups. HE appears to be the only part of the education system where there are indications that such a 'catch up effect' occurs. At education phases below the age of 18, evidence suggests that educational inequalities widen, or are at least maintained. As lower socio-economic status and low tariff attainment are clearly correlated, implementing a minimum entry tariff threshold for admission into degree programmes may thus prevent prospective students from disadvantaged groups, particularly state schools, from benefiting from this catch up effect. This may set back prospects for improving social mobility in England in the coming period and should be avoided.
11. One of the reasons HE represents such a unique educational environment is the value-added in students, developed throughout the course of a student's journey at university. Too much focus on inputs, often assessed through crude measures lacking context, instead of the level of improvement or achievement of individuals, that is to say the educational outputs, risks missing the point. The Department for Education (DfE) and the Office for Students (OfS) have both stated their aims to direct focus more on outputs, rather than inputs. Policy recommendations designed for the sector should therefore reflect this for the sake of consistency and coherence.
12. It may be superficially attractive to suggest that only students reaching a certain level of attainment should be able to access a university degree programme, but this approach would have major disadvantages. It has the potential to limit opportunities to access higher education to those without strong A level or BTEC attainment, ignoring many contextual factors that are currently considered when assessing a prospective student's record of 'attainment' more broadly conceived. For these and other reasons, universities, as autonomous admissions authorities, do not rely exclusively on tariff attainment for their prospective students when considering offers.
13. It is also the case that foundation courses offered by universities for students often help where their achievements are insufficient in some aspects of their studies (e.g. numeracy). Such a stark, binary approach created by a minimum tariff policy may for instance rule out an A* student in one subject who

struggles with other essential components of their studies that can be resolved through foundation courses.

14. If a minimum tariff threshold approach were to be implemented by government across the sector in England, it could have a devastating impact on a range of universities and their capacity to recruit students from socially disadvantaged groups. Modern universities and creative arts focused universities in particular use a much broader and more holistic approach to recruitment than simply calculating raw UCAS points in their assessment of the academic potential of applicants, both for young and mature students. Modern universities are those that have made the greatest contribution towards widening participation and increasing access to universities in the last 15 years and as such they have made a significant contribution to successive governments' policies on social mobility and productivity.
15. It is important to highlight how a minimum entry tariff would have an uneven and counterproductive impact concerning social mobility and social justice. One way of doing so is to look at the attainment gaps that have emerged at different levels of education in England. Many of these trends will exist across the whole of the UK, but since the policy recommendations and frameworks that are being discussed here concern universities in England, this briefing focuses on those institutions (though there may be UK-wide implications).

Attainment gaps in primary and secondary education

16. There appears to be a general widening of the education gap in England as pupils progress through the different stages of compulsory education (up to the age of 18). Disparities in achievement are compounded as children grow older and those who do not achieve their full potential fall further and further behind their peers in terms of relative attainment (without sufficient or timely educational intervention).
17. The existence of attainment gaps due to socio-economic status at schools in the UK has been well documented in recent years. Reports show that notable gaps emerge for disadvantaged students both at primary and secondary level. Analysis of the 2015 OECD PISA scores shines a light on significant socio-economic gaps between school pupils in the UK.¹ While all four UK countries display evidence of wide achievement gaps, those gaps are widest in England. This has been attributed to the particularly strong performance of its high achievers, meaning that the so-called "bright but poor" pupils are being held back with their potential going to waste.
18. A recent report from the Education Policy Institute demonstrated this phenomenon clearly.² In 2016, disadvantaged pupils were seen to be 18.9 months behind their more advantaged peers on average once they get to the end of secondary school. The report also shows that since 2007, the attainment gap for persistently disadvantaged pupils has increased, albeit marginally. Another key observation from this report is that there is a strong geographical dimension to the educational attainment gaps across England. Although there have been improvements in schools in England, the report stresses that the pace of this change is insufficient. This slow pace of change means that the role of universities - and modern universities in particular – will be vital in addressing these gaps later in the life of the individual.
19. Modern universities have significant capacity to reduce or reverse attainments gaps. Many modern universities are located outside of the biggest urban conurbations of the UK and are vital in creating a local offer for people in the surrounding communities. Modern universities are therefore of strategic importance in tackling socioeconomic disadvantage in education.³

¹ See: https://www.suttontrust.com/wp-content/uploads/2017/02/Global-Gaps_FINAL_V2_WEB.pdf

² See: https://epi.org.uk/wp-content/uploads/2017/08/Closing-the-Gap_EPI-.pdf

³ For example, one of the areas highlighted in the aforementioned report as having the greatest socioeconomic attainment gap at secondary school is Cumbria. The University of Cumbria, a MillionPlus member institution, is the only university in this region and therefore plays a pivotal role in helping to tackle educational disadvantage in that geographical space.

Addressing regional variation in attainment

20. Data from ONS about educational attainment at level 3 (e.g. A level, BTEC and the new T levels) shows significant variation through the UK and in the different English regions. A minimum tariff policy would impact disproportionately on the parts of the UK that are in greatest need of educational investment and opportunity. These are the parts of the country considered to be the most "left-behind" and therefore at greater risk of not developing the higher-level skills required to support economic growth. For example, the highest performing region in England for A level performance is the South East, while the East Midlands ranks lowest. In terms of local authorities, those with the highest average point score per A Level entry are found in outer London and the South east while some of the lowest are to be found in the north west.⁴
21. A similar picture is shown in the data that is available on level 2 attainment in England. The regions with the highest average Attainment 8 score per pupil are the South East (52.7) and London (50.4) while those with the lowest averages are the North West (43.0) and the West Midlands (40.3). When it comes to local authorities, the vast majority of the highest performing areas are found in London and the South East while those with the lowest average Attainment 8 scores are predominately located in the North and the Midlands.⁵ A minimum tariff policy would prevent higher education providers being able to offer educational opportunities to both those individuals and the regional economy.
22. Modern universities have led the way in providing a well-developed local offer for students over the past couple of decades. They have worked hard to help tailor the educational service they provide so that it fits their regional context and can suit the needs of students in surrounding communities. A recent report from the Higher Education Policy Institute (HEPI) highlighted the rise in "commuter students" across the UK.⁶ With the widening of access and participation into HE in the UK, we have seen the rise of students who do not fit the traditional profile of a "residential" student (a residential student is one that lives at least part of their time at university on, or in close proximity to, campus).
23. Modern universities have been the driving force behind the rise in commuter students in recent years. Two MillionPlus members contributed valuable case studies towards the HEPI report, emphasising the importance of these students in a regional context and how they are a key component of the civic role played by a university. Members detailed the work they had carried out to maximise these students' engagement with the university community and strengthen their sense of identity as a student. Accepting that there would be an uneven regional impact of a minimum entry tariff, as outlined above, there will also be implications for the commuter student population who will be more concentrated in certain regions, and at certain universities, than others.
24. Outside of London and the south east there are significantly lower levels of attainment, and in many areas young people are being failed by the school system. For example, in some parts of the country, less than a third of school leavers enter HE currently and therefore a barrier such as a minimum tariff being implemented would further segregate many areas of the country which have very low GVA and substantial economic and environmental challenges.

Attainment gaps narrowed during higher education

25. Given that attainment gaps between advantaged and disadvantaged groups widen during compulsory education we might also expect this to be the case in higher education. This would be the wrong assumption to make for a variety of reasons, principal among them is the fact that higher education constitutes a different learning environment to the educational levels that precede it. There is a much

⁴https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/676389/SFR03_2018_Main_text.pdf

⁵ Figures taken from Table LA2: Average Attainment 8 scores by Local Authority and Region found in Main local authority tables: SFR01/2018 <https://www.gov.uk/government/statistics/revised-gcse-and-equivalent-results-in-england-2016-to-2017>

⁶ See <https://www.hepi.ac.uk/2018/12/13/homeward-bound-defining-understanding-aiding-commuter-students/>

greater focus on independent learning and study, self-discipline and organisation. Independent and selective schools have been adept at ensuring that highly intensive approaches to attaining top exam performance among their pupils puts them at an advantage compared to their age group peers at mixed intake comprehensives.

26. There is more opportunity for the educational attainment gaps to be narrowed, or even reversed during higher education. While at school, socioeconomic advantage serves to maximise pupils potential through strong support networks and enhanced social, cultural and human capital. At university, as adults in an altogether more independent environment, students cannot so easily rely on such support mechanisms.
27. There is evidence to support this notion when comparing those who were educated at independent schools with those educated at publicly-funded institutions (e.g. maintained state schools and academies). Researchers have shown that students from state schools are more likely to perform better than their counterparts from independent schools when entry qualifications are controlled for.⁷ It is well-established that pupils from independent schools are more likely on average to achieve higher A level grades, or a greater total of UCAS points, than their peers in state education. This implies that there is some level of catch-up or reversal between state-school and private school students at university concerning attainment.
28. While there is consistency in different reports and research papers on the distinction between state and independent schooling, the results from research on socioeconomic grouping (removing schooling as a metric of socioeconomic status) is less conclusive. For example, research from the University of Manchester suggests that socioeconomic status for female students "... associates more with 'good' degree outcomes for female students than males." In other words, for women, there seems to be some correlation between socio-economic group and performance at university. For men, in contrast, there is no significant relationship to be found based on this piece of research.
29. However, an Institute for Fiscal Studies report (2014) showed that, the raw data on university progression and outcomes shows that, unsurprisingly, students from the most deprived backgrounds are more likely to drop out and less likely to graduate with a 2:1 degree classification. However, using school as proxy for socio-economic advantage, there was a reversal of the attainment gap between students at university when some control was made for the social capital of students. As the report states:

The raw differences suggest that students from the best-performing schools tend to outperform those from the worst-performing schools; however, these relationships are reversed once we compare individuals with the same human capital on entry to university, with those from the worst performing schools now, on average, less likely to drop-out, more likely to complete their degree and more likely to graduate with a first or a 2:1 than those from the best performing schools.⁸

30. The Institute for Fiscal Studies analysis concluded that it is more of a challenge for universities to discern the true potential of people from lower socio-economic backgrounds and their capacity to succeed in higher education. This has a number of different possible implications for admissions departments at universities and the sector more broadly, but in this context, it serves to undermine the justification for a minimum entry tariff for higher education.

SLAMMING THE DOOR ON MATURE STUDENTS

31. Mature students usually have lower tariff points on entry to higher education and a policy of minimum tariff entry to higher education would have highly negative consequences for the participation of mature students. Enabling mature students to access higher education is good for social mobility and economic

⁷ Higher Education Funding Council for England (HEFCE). 2014. *Differences in Degree Outcomes: Key Findings*. <https://www.hefce.ac.uk/pubs/year/2014/201403/#d.en.86821>

Steven Jones, Maria Pampaka, Daniel Swain & Julian Skyrme (2017) 'Contextualising degree-level achievement: an exploration of interactions between gender, ethnicity, socio-economic status and school type at one large UK university', *Research in Post-Compulsory Education*, 22: 4: 455-476.

⁸ See <https://www.ifs.org.uk/uploads/publications/wps/WP201431.pdf>

productivity. It provides a way for “left-behind” individuals to gain a second chance at educational success, improving outcomes for them and their families. It also enables employers to develop their employees to increase their skills and further contribute to business success. However, opportunities for mature students to benefit from higher education have reduced significantly since 2012.

Providing opportunities for mature students

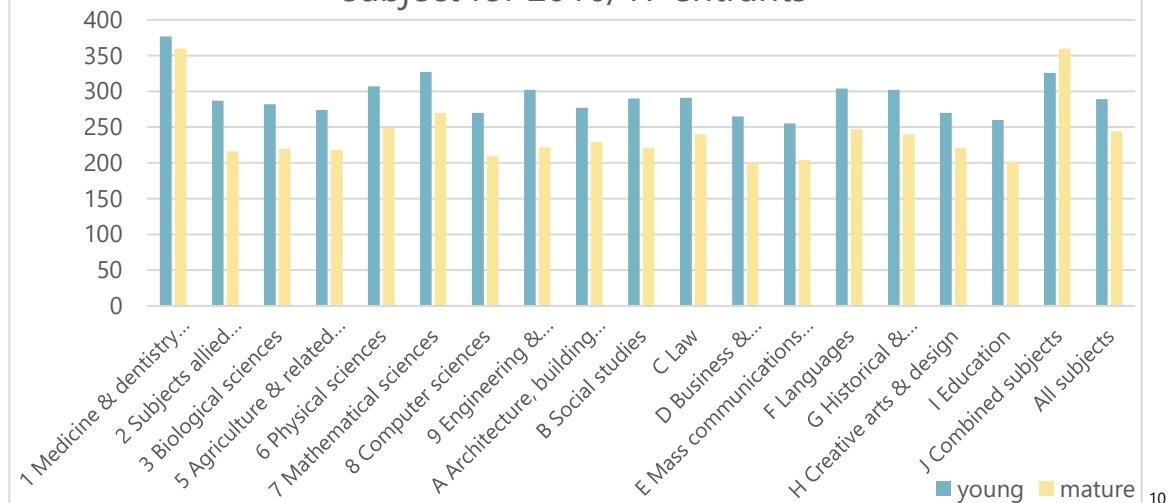
32. The MillionPlus report, *Forgotten Learners: Building a system that works for mature students*,⁹ highlighted the downward trajectory in mature student numbers in the UK. In England, for example, the number of mature entrants to university has halved since 2008/09. This overall trend has occurred against a backdrop of innovative and pioneering methods used by modern universities in the engagement and recruitment of mature students. However, these processes have not been able to entirely mitigate the effect of increased fees and limited financial support available for mature students.
33. Some modern universities have boosted mature student recruitment at different points over the past decade, bucking the national tide of a sharp reduction in mature student numbers overall. One of the ways in which some modern universities achieve this is by taking a more holistic approach to the recruitment of mature students. Universities will look beyond A-Levels, BTEC, and UCAS points and develop their own internal criteria for assessment that looks at a candidate more broadly and considers their full academic potential. This is particularly relevant for mature students, who often have significant life experience that contributes towards their skills, knowledge and their ability to succeed at university. For example, mature students are often assessed for entry based on a profile of employment-related achievements, or a portfolio of artefacts or performances (depending on the discipline).
34. There will be many instances where mature applicants will have struggled to succeed at secondary school for various reasons, which often lie beyond the classroom, masking their true potential. Making an application to university later in life usually represents the settled desire of an individual to start a new chapter in their development, re-skill or up-skill in a carefully chosen field or broaden their horizons to improve not only their own life, but the lives of those around them.
35. Modern universities are not only support opportunities for mature students where they have failed to achieve the relevant outcomes in school, but they also recruit students who have had much greater challenges in their lives beyond their education – health problems, drug and alcohol addiction, homelessness, involvement in crime. Through their experience of higher education and the support of universities these students are reintegrated into society and costs are significantly reduced for all of the wrap around public services.

Tariff points on entry for mature students

36. The data available through the HESA database concerning entry qualifications paints an interesting picture in terms of the disparity between the average entry qualifications of young and mature entrants to university. As Figure 1 shows, the average number of UCAS points for young students is notably higher than that of mature students (defined as being 21 or over).
37. Figure 1 clearly demonstrates the gap that exists between young and mature students in terms of entry qualifications for those whom we know their tariff point equivalence. The data used to generate Figure 1 is based on the information that is submitted by institutions and is not a comprehensive representation of the full student population in the UK. Many students’ qualifications upon entry are reported by their institution and do not have a readily available UCAS point equivalence. Although we cannot say for sure, many of the mature students in this category are likely to fall in the lower half or quartile of the spectrum of UCAS points on entry. If this is true, the gap between young and mature students could well be greater than that shown in Figure 1.

⁹ See <http://www.millionplus.ac.uk/policy/reports/forgotten-learners-building-a-system-that-works-for-mature-students>

Figure 1. Average UCAS points prior to entry to HE by subject for 2016/17 entrants



- 38. The whole UCAS system, including its language and its internal frameworks (e.g. UCAS points), is one that has evolved over time to cater primarily for the needs of young applicants progressing to university immediately after leaving school.
- 39. A significant proportion of mature applicants do not apply through UCAS, but instead through direct interaction with an institution. An emphasis on UCAS points, which would presumably be the basis for a national minimum entry tariff in England, lacks salience when it comes to mature students. This is because any form of minimum threshold that focuses too exclusively on such a framework, and is too restrictive or limiting, largely ignores the way in which a large proportion of mature students engage with, and apply for, university.

CONCLUSION

- 40. Higher education offers a genuine second chance or blank slate for students of all ages. Students from disadvantaged backgrounds may be more highly motivated to engage with higher education and independent study to a greater degree than those used to the intensive support characteristic of family networks and better-resourced schooling.
- 41. There is a geographical dimension to school attainment in the UK that should be considered. A minimum entry tariff could have perverse consequences on other stated objectives of the OfS or the government, by reducing universities' capacity to recruit students from low-participation areas in the country. A minimum entry tariff could contribute towards regional inequality more broadly.
- 42. There is a clear disparity between the entry qualifications of young and mature students. This indicates that if a minimum entry tariff were to be introduced it could have deeply harmful effect on prospects for participation in higher education for mature students if such a measure were implemented. The Office for Students has identified mature students as a key priority in their access and participation agenda and a policy such as this would seem to run completely counter to this objective.
- 43. A minimum entry tariff would not only act as an actual barrier to those who did not meet the minimum entry tariff threshold that was established but it may also act as a deterrent and a psychological barrier to those mature learners considering applying to higher education, especially those who may need to undertake some form of qualification to increase their credentials to strengthen their application.

¹⁰ All data taken from HESA 2016/17 <https://www.hesa.ac.uk/data-and-analysis/ukpis/widening-participation/table-WP2>
Average UCAS points generated from only those which had a designated point tariff or equivalence, columns 17-28 excluded.

- 44.** All these negative impacts would have severe implications for the economy. A steady pipeline of mature learners is an important means in which the workforce can up-skill and re-skill to meet the demands of the twenty-first century. Moreover, capping aspiration at a time when the nature of work is beginning to change for many people, and many jobs will come under the threat of automation in the medium term, intensifying the need for skilled employees, would seem counterproductive and amount to an act of economic constriction.