1) THE PARLIAMENTARY REVIEW IS ONGOING

1st March was the deadline for the call for evidence for the Independent Review of the TEF. BU submitted a response which you can read here.

Dame Shirley Pearce made a speech at the Association of University Administrators conference on 16th April at which she said that the TEF would not be scapped. HE at Research Professional report:

- She said that the review “will try to come up with recommendations that will ensure that the core process of the TEF is as transparent and strong as it can be”.

- While Pearce said that she could not speak further about the possible outcomes of the review, her comments would seem to thwart the hopes of some in higher education that the review would bring an end to the exercise. She said that she recognised her committee would be expected to comment on the whether to proceed with a subject-level TEF as well as the cost and burden of such an exercise.

- ...Elsewhere in her address, Pearce did acknowledge some of the negative feedback concerning the TEF that her review had received. She said that the framework “was not very well known internationally, and even where it is, students are not using it”.

- She also said that the panel has been told, “repeatedly”, that the award of a gold, silver or bronze rating was “too simplistic, collapsing too much complex data into a single point”. Pearce said that in the original scheme, “Bronze was supposed to be a success. In the Olympics athletes are happy to win bronze; it means you have achieved excellence above a base line. But that is not how bronze in the TEF is viewed internationally.”

---

**Gold:** The provider supports consistently outstanding teaching, learning and student outcomes for its students. It is of the highest quality found in the UK higher education sector.

**Silver:** The provider supports excellent teaching, learning and student outcomes for its students. It consistently exceeds the rigorous national quality requirements for the UK higher education sector.

**Bronze:** The provider supports good teaching, learning and student outcomes for its students. It meets rigorous national quality requirements for the UK higher education sector.
Pearce added that there was now “anecdotal evidence of a drift towards gold” with institutions “that would previously have expected silver now re-applying for gold”.

The former vice-chancellor also spoke of possible unintended consequences of the TEF process, including “economic and social consequences for towns where universities with a poor TEF result find themselves unable to recruit students”. She also said she was concerned that universities in the devolved nations of the UK were “being dragged into an English thing” and speculated, “One unintended consequence of the TEF could be the break-up of UK higher education.”

“That is why we have to get the review right, or as right as possible,” she said. However, Pearce gave no indication that she considered the terms of reference of her review to suggest the abolition of the TEF.

Instead she said that the review would look at the tensions in the TEF process between, “providing information on teaching and enhancing teaching quality; the need for simplicity versus the need for accuracy and transparency; the relative and absolute measures implied by benchmarking; and the balance of quantitative and qualitative assessment”.

Read some other commentary here
- Jim Dickinson on Wonkhe: 5/3/19
- Johnny Rich on Wonkhe: 8/4/19
A) UNIVERSITIES UK

The [UUK submission](#) was widely covered in the press, mostly because they were very critical of subject level TEF. William Hammonds of UUK [writes about the UUK response on Wonkhe here](#).

Their press release says:

*In this report, UUK ...states that overall the TEF is having a tangible effect on the sector, but there is still some way to go to improve the system. In particular, UUK calls on the government to reconsider plans for subject-level assessment following the challenges arising from pilots in 89 universities, and to look again at its value for students, universities and taxpayers. ...UUK concludes:*

- The TEF is having an impact on the sector, in teaching and learning strategies and the monitoring of outcome measures.
- It is however hard to gather conclusive evidence of its contribution to teaching and learning experience and outcomes.
- Its definition of excellence is weighted heavily towards employment outcomes, without full consideration of a student’s overall study experience and the wider benefits of teaching and learning for students and society.
- Awareness of the TEF is still low among students while gradual and piecemeal changes have made it complicated for them to understand or to use it most effectively.
- New governance arrangements should be made to ensure the government, the Office for Students, students and providers have a clear stake in strategic decision-making.
- A year into piloting subject-level assessment, there is considerable doubt over whether this will drive real value for students, while it is adding significant complexity and cost which could divert resource from other student-focused areas.

UUK believes that plans for subject-level TEF should not proceed until the limitations of the methodology, its resource impact, and the actual value of its contribution to student decision-making, have been fully considered.

Estimates from UUK put the cost of taking part in year two of the TEF at £4 million for participating universities, a figure which would increase significantly with a full roll out of subject-level assessment. UUK is calling for further consideration to be given to whether the aims of subject-level assessment could be met through existing or alternative information sources such as Unistats, university websites and league tables. Further work into this area should also look at the risks of the subject-level TEF; including concerns around the quality of the data and metrics, and their ability to support students in important and complex decisions.

B) ROYAL SOCIETY OF STATISTICS

The Royal Society of Statistics [wrote an explosive submission](#), which builds on their previous submissions to the year 2 and subject level consultations (there are links in the document), which they say have been largely ignored. They say:

- the TEF “appears to transgress...the..UK Statistics Authority Code of Practice for Statistics
- the data is potentially deceptive and misleading for students - it should be communicated to students that “the TEF is observational in nature and that TEF differences are likely not solely due to teaching quality differences”
- “The use of the same TEF award, and the same TEF logo, for all types of university seems highly misleading. The literature and communication around TEF should make it clear that TEF awards are not comparable across the board.”
• the presentation of data in the TEF and the way that is benchmarking may encourage game playing by universities (e.g. to improve their metrics)

• the TEF benchmarking is flawed from a statistical point of view and many flags will have been awarded incorrectly “far too many flags are being raised, erroneously alerting the downstream human TEF panels to effects that are just not there. Our conclusion is that the previous TEF awards are not valid”

• It shouldn’t be called TEF because it doesn’t assess teaching quality

• And this: “TEF also does not appear to capture the time series nature of teaching quality. We have made this point previously in our consultation responses. What is the evidence to say that a teaching quality mark now will result in a student getting a good experience in several years’ time?”

• TEF is oversimplifying the data, in a way which is unhelpful – and misleading. Students should be able to assess the detailed data themselves on a more granular basis through a revamped unistats. “…. It might be argued that the TEF’s philosophy that distils diverse institutions into three categories, underestimates the intellectual ability of prospective students and other stakeholders”

Conclusions - Fundamentally, do the metrics input to TEF measure quality of teaching? Do the provider submissions measure teaching quality? We are sceptical. There may be some distant indirect association, but what robust research has been carried out to assess this? Alternatives might be to rename TEF (to remove ‘teaching excellence’), or actually carry out some evaluation of teaching quality (which would be expensive). We do think it is useful for students to see the metrics that underpin TEF, relating to their potential course choice. The Unistats website already does this and seems to be useful and well-used by potential students. The RSS could imagine an upgraded Unistats site containing well-chosen and well-communicated metrics being valuable for prospective students and other stakeholders.

2) WHAT ARE THE LATEST CRITERIA AND METRICS?

The year 4 version of TEF, which includes a second pilot of subject level, is ongoing. BU has not entered, and as you will have seen from the timeline above, we are not required now to enter until 2021 (writing submissions in 2020). The criteria and metrics may have changed again, given the Parliamentary Review and also because they have changed every other year, so we would expect another set of OfS led changes again to institutional TEF. Subject level TEF will almost certainly change (and might even be abandoned).

However, it is worth looking at the current criteria and metrics, because they are different to years 2 and 3.

The TEF focuses on three aspects of quality

<table>
<thead>
<tr>
<th>Teaching Quality (TQ)</th>
<th>Learning Environment (LE)</th>
<th>Student Outcomes and Learning Gain (SO)</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Student engagement with learning (TQ1)</td>
<td>• Resources (LE1)</td>
<td>• Employability and transferable skills (SO1)</td>
</tr>
<tr>
<td>• Valuing teaching (TQ2)</td>
<td>• Scholarship, research and professional practice (LE2)</td>
<td>• Employment and further study (SO2)</td>
</tr>
<tr>
<td>• Rigour and stretch (TQ3)</td>
<td>• Personalised learning (LE3)</td>
<td>• Positive outcomes for all (SO3)</td>
</tr>
<tr>
<td>• Assessment and feedback (TQ4)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Student partnership (TQ5)</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

There are 11 criteria mapped to these three aspects

BU policy team – May 2019
### Teaching quality

<table>
<thead>
<tr>
<th>Teaching quality</th>
<th>Provider-level criteria are the extent to which:</th>
<th>Subject-level criteria are the extent to which:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Student engagement with learning (TQ1)</td>
<td>The provider leads enhancement of practices that encourage effective student engagement with learning.</td>
<td>Students are engaged with learning and encouraged to commit to their studies, including through appropriate contact time and independent learning.</td>
</tr>
<tr>
<td>Valuing teaching (TQ2)</td>
<td>The provider fosters a culture that promotes, recognises and rewards excellent teaching.</td>
<td>Excellent teaching in the subject is promoted and recognised, and innovation is supported.</td>
</tr>
<tr>
<td>Rigour and stretch (TQ3)</td>
<td>The provider maintains high standards that challenge students to develop independence, knowledge and skills that reflect their potential.</td>
<td>Curriculum, pedagogy and assessment stretch students to develop independence, knowledge and skills that reflect their potential.</td>
</tr>
<tr>
<td>Assessment and feedback (TQ4)</td>
<td>The provider’s assessment and feedback policies effectively support students’ development, progression and attainment.</td>
<td>Assessment and feedback practices effectively support students’ development, progression and attainment.</td>
</tr>
<tr>
<td>Student partnership (TQ5)</td>
<td>The provider understands and works in partnership with its students to influence the strategic approach to, and enhancement of, provision.</td>
<td>Students studying the subject are understood and engaged as partners in the delivery, development and enhancement of provision.</td>
</tr>
</tbody>
</table>

### Learning environment

<table>
<thead>
<tr>
<th>Learning environment</th>
<th>Provider-level criteria are the extent to which:</th>
<th>Subject-level criteria are the extent to which:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Resources (LE1)</td>
<td>The provider’s physical and digital resources support and enhance teaching and learning.</td>
<td>Physical and digital resources are used effectively to aid teaching, learning and the development of independent study and research skills.</td>
</tr>
<tr>
<td>Scholarship, research and professional practice (LE2)</td>
<td>The provider facilitates a learning environment that is enriched by scholarship, research and/or professional practice.</td>
<td>Teaching and learning is enriched by student exposure to and involvement in scholarship, research and professional practice.</td>
</tr>
<tr>
<td>Personalised learning (LE3)</td>
<td>The provider facilitates personalised learning and a supportive environment that enables student progression and attainment.</td>
<td>Students are supported as individuals to succeed in their learning, progression and attainment.</td>
</tr>
</tbody>
</table>

### Student outcomes and learning gain

<table>
<thead>
<tr>
<th>Student outcomes and learning gain</th>
<th>Provider-level criteria are the extent to which:</th>
<th>Subject-level criteria are the extent to which:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Employability and transferable skills (SO1)</td>
<td>The provider strategically enables its students to gain knowledge, skills, work-readiness and personal development that equip them for their careers, and enhance their personal and professional lives.</td>
<td>Students gain knowledge, skills, work-readiness and personal development, which are embedded within the curriculum and wider student experience.</td>
</tr>
<tr>
<td>Employment and further study (SO2)</td>
<td>The provider effectively supports students through their academic and wider experiences to progress into graduate level employment or higher study.</td>
<td>Students progress educationally and professionally, into graduate level employment or higher study.</td>
</tr>
<tr>
<td>Positive outcomes for all (SO3)</td>
<td>The provider’s students from all backgrounds achieve positive outcomes. The provider strategically identifies and addresses potential differential outcomes of disadvantaged students.</td>
<td>Students from all backgrounds achieve positive outcomes. Potential differential outcomes of disadvantaged students are identified and addressed.</td>
</tr>
</tbody>
</table>

### Supplementary data:

- **Institution only:**
  - Grade inflation
  - Differential degree attainment by background
  - Sustained employment or further study (LEO)
  - Above median earnings threshold or higher study (LEO)

### Teaching quality (institution and subject)

- Teaching on my course (NSS 1-4)
- Assessment and feedback (NSS 5-9)
- Student voice (NSS 23-25)

### Learning environment (institution and subject)

- Academic support (NSS 10-12)
- Learning resources (NSS 18-20)
- Non-continuation (HESA)

### Student outcomes and gains

- **Institution only:**
  - Employment or further study (DLHE/Graduate Outcomes)
- **Institution and subject:**
  - Highly skilled employment or further study (DLHE/Graduate Outcomes)
3) SPECIFIC METRICS RELEVANT TO THE TEF

A) EARNING DATA

The DfE have issued statistics, including on apprenticeships, schools and FE: Employment and earnings outcomes for higher education graduates data

- Graduates’ median earnings rise with the time since they graduated, with average earnings in 2016/17 ten years after graduation being £30,500, compared to £23,300 three years after and £19,900 one year after

B) LONGITUDINAL EDUCATION OUTCOMES DATA (LEO)

UUK have published a parliamentary briefing:

- For universities, LEO can be a valuable source of intelligence on how they are supporting and equipping graduates to succeed in the labour market. Universities will use the information, taking into consideration appropriate context, to inform thinking on course development and design, support for wider employability and skills development of students, and dialogue with relevant employers and sectors on their needs. Although a relatively new source of information, LEO has the potential to become an increasingly valuable tool for institutions.

- Despite the benefits of LEO there are limits in how it should be used. The main issue is that relying on earnings alone, or in a significant way, to define success and to guide decisions risks limiting opportunity and choice for graduates and the supply of skilled people across important areas of the labour market. These risks are particularly pertinent to using LEO as a direct funding or policy tool. Using LEO as a blunt mechanism to drive funding to institutions, or limiting access to fee income, would create significant risks. LEO is not only new and untested, meaning such an approach would be an experiment, there are also inherent issues with scope, coverage and methodology that mean it is not fit for these purposes. This briefing identifies 10 of these risk areas.

1. The current LEO methodology does not account for whether a graduate is in full or part-time work.... Used as a mechanism to drive funding decisions or limiting student numbers based on salary outcomes would lead to institutions being penalised for producing valuable part-time workers and lead to labour market distortions....

2. LEO does not currently account for the region in which a graduate currently works. ....A funding model for higher education driven or informed by LEO could act as a drag on regional growth, limiting an institution’s ability to support local skills needs....

3. LEO data is impacted by external economic activity. Over the past decade there has been a financial crisis, the subsequent recession, and a period of poor wage growth. ...LEO is not a good predictor of current university entrants’ future earnings. In addition, the data is not currently adjusted for inflation....

4. ...most of the earnings and employment figures released so far have excluded graduates who are self-employed in the relevant tax year. The exclusion of the self-employed has more of an impact on arts graduates, and therefore arts-focused institutions, as a larger than average proportion of their graduates are self-employed. ....

5. The LEO figures exclude those who moved out of the UK after graduation for either work or study, those who are earning below the Lower Earnings Limit, or those who have voluntarily left the labour force. ..."
7. Graduate salaries are significantly influenced by external factors (for example, parental wealth, school attainment). ...a funding model based on, or significantly influenced by LEO data, may restrict opportunity from those that would most benefit from a university education. Furthermore, despite reporting lower earnings than men in raw LEO figures, women have been shown to benefit most from higher education earning 50% more than women who don’t (compared to 25% for men)

8. LEO does not take multi-subject courses into account. ...working against innovation and limiting ability to respond to rapidly changing skills and workforce needs.

9. Going to university provides benefits beyond future earnings. This is especially true for graduates at institutions which specialise in fields like the arts, charity sector, nursing or the public sector, all of which are of benefit to culture, society and the economy but can have below-average earnings. ...

10. Some graduates may be very satisfied with their educational choices and careers, despite having lower earnings. Using LEO to drive funding decisions would restrict opportunity and choice available for those that do not regard salary to be the sole determinant of a good outcome from their university experience.

And there is a blog by David Kernohan on Wonkhe: LEO is an indicator. It’s not an exact measure, and it isn’t a prediction

C) MORE CRITICISM OF LEO

Interestingly in a slightly different context, David Willetts, who as Minister for Universities commissioned the original LEO research, has written for the Times higher saying why LEO should not guide policy decisions – this was in the context of discussions of LEO being used to set fees or limit access to HE as part of the Review of Post-18 Education and Funding, but the arguments may be applicable to its use in TEF as well. David Willetts has written for the Times Higher:

• Which universities' and subjects' graduates go on to earn the most – and the least? Those are not unreasonable questions for prospective students to wonder about. They are also very relevant to policymakers – particularly in England, where the government-commissioned Augar review of post-18 funding is due to report imminently.

• Until recently, neither students nor policymakers had any firmer basis to answer their questions than anecdote and received wisdom. That is why, as UK minister for universities and science, I commissioned the longitudinal education outcomes project (LEO). This is one of the biggest, most policy-relevant datasets to arrive in Whitehall for years. By linking educational data on students to tax data on their earnings, LEO promises fresh insights into social mobility by tracking specific routes from school to university and out to good jobs. It is a good example of using administrative data for social science. No wonder it is hot.

• But it is also dangerous. The idea that we have reached “peak student” is currently fashionable, hovering somewhere between a forecast and a policy preference. And LEO is taken to present an objective means by which student numbers could be reined in, by cracking down on courses that yield low graduate returns. But that, in my view, would be a misuse of the data and a major policy error.

Discussing the LEO research project (by Neil Shephard (then at Oxford, now at Harvard University) and Anna Vignoles (then at the UCL Institute of Education, now at Cambridge), he says:

• The research showed that there are wide disparities in graduate earnings university by university, and this would have made it possible to implement a full-blown version of the Browne model. But the research also revealed the actual reasons for the differences in graduate earnings and so raised big doubts about whether this was good grounds for divergence in fees. The key reasons were
students’ prior attainment, parental social class and subject studied. For most universities, there was not a strong institutional effect independent of these factors. So a higher fee would be a reward not for educational quality but for selecting students with good A levels from affluent families who want to be bankers or lawyers. It would be the pupil premium in reverse. These arguments are still relevant to today’s debate.

He continues:

- This is information that certainly ought to be available to students. But now that the Augar review has opened up a wider debate on higher education funding, there are ways that policymakers could be tempted to act upon it, too. Most obviously, they might decide to refuse to provide loans for some courses at the universities with apparently low returns. However, such a move would be problematic. The initial LEO research project was very well suited to assessing specific policy options around graduate repayments. It used graduate earnings to assess prospects for repaying loans. Since repayment obligations are largely determined on the basis of taxable earnings, the data and the policy question were tied together. Earnings data, however, are not necessarily a guide to wider policy, such as the performance of universities.

- For instance, LEO measures annual earnings, with no distinction between part-time and full-time work, so it does not say how much hourly earnings are. Young women with poorer qualifications tend to work part-time; this artificially depresses their earnings, which, in turn, boosts the relative returns to the female graduates. Furthermore, LEO offers no information on occupation or industry or other employer characteristics, so a university that provides nurse and teacher training will inevitably appear to perform less well than one focused on financial services and City law firms.

- ... And while the data show in which part of the country someone was educated, they do not show where they work. As some graduates stay near where they studied, this penalises universities in areas with lower earnings. So when the data tell us that some non-graduates earn as much as graduates, they could be telling us that a public school dropout working at an upmarket estate agent in Kensington earns as much as a recent graduate working part-time in Bolton.

- ... The dataset stops at age 29 because of limitations on how far back the education data are available. So it fails to capture the evidence that graduate earnings have a better long-term trajectory than non-graduate earnings. This is particularly true of some arts courses. The data favour those occupations where you get to peak earnings early on. They mirror the failures of the British economy, rewarding quick, high returns over longer, slower ones. ...

- ... Another rather awkward angle is that there seems little correlation between earnings figures and the student satisfaction data that are part of the teaching excellence framework – the other obvious driver of policy direction. This just underlines the point that the LEO data have strongest implications for policy that is most related to earnings and tax. The further you go from the original purpose of the data, the more tenuous the link to the policy conclusion.

- Excluding the courses and universities that appear to do badly under LEO from public support would introduce a two-tier system in which affluent parents, whose children do not need public loans, could presumably buy places. The performing arts would become even more middle class. It would also mean that a Whitehall planner has to pronounce on the value of sports science at University X and drama studies at University Y. It would take an interesting new dataset and turn it into a tool of a very significant policy directly constraining the options for prospective students: a role that is quite simply beyond it and a threat to LEO’s long-term credibility and development.
D) CONTINUATION DATA

HESA have published experimental data about continuation, one of the metrics used in TEF. As we have written before, non-continuation is linked to a whole lot of different factors, but in the TEF of course the implication is that students leave because the course is poor quality or they do not believe that carrying on will make enough difference to their employment prospects afterwards.

Arthi Nachiappan and David Kernohan from Wonkhe have helpfully looked at the data to see what it says about who leaves HE. Of course there are interactive data views to play with too.

- We tested a common variation on the above theory – that non-continuation rates are lower at the Russell Group and higher at post-92 institutions due to the latter taking higher proportions of first degree young undergraduate students from low participation backgrounds...

- Among Russell Group institutions, students who didn't continue were more likely than average to transfer to another provider than to leave higher education altogether. Russell Group institutions tended to have a lower proportion of students from low participation backgrounds than the average provider, but non-continuation rates for those students from low participation backgrounds at Russell Group universities tended to be lower than 8%.

- The equivalent figure for post-92 institutions is in the range of 5-20%. When we look at students from other backgrounds, this range narrows to between 4 and 12% at post-92 institutions, while at the Russell Group it is between 1-7%, but generally – with the exception of Queen Mary University of London – below 4%. The proportions of those from low-participation backgrounds who do not continue in their studies is higher at both groups of institutions than the equivalent figures for students from other backgrounds.

- ….But any idea that alternative providers are currently reaching students that would otherwise not access HE, much less offering them a successful student experience, should be abandoned.

They also look at subject level:

- … the overall rate for all students leaving computer science (for instance) is 9.8%. But among students who enter following a HE foundation course, the rate is 4.2%. What students come in with is a huge predicting factor of their course outcome.

- Among students entering with at least some tariff points, mass communications and documentation sees the largest percentage of non-continuation (20.40%), but the largest number of students not completing their course (6,341) are on social studies.

- For those with BTECs – to give another example – the subject area with the largest number of non-completions is biological sciences (5,738), but the subject area with the highest percentage of non-completions is engineering and technology. The overall preferred subject of study for BTEC students is business and administration.

And what’s next?

- … once again it is Damian Hinds rather than Chris Skidmore that supplies our comment. Inflammatory “bums on seats” language will do little to endear him to the sector, and once again the threats of Office for Student action are wheeled out.

- His substantive point is unlikely to surprise anyone: “No student starts university thinking they are going to drop-out and whilst in individual circumstances that may be the right thing, it is important that all students feel supported to do their best – both academically and in a pastoral sense. Today we have announced a new taskforce to help universities support students with the challenges that starting university can involve, but universities need to look at these statistics and take action to reduce drop-out rates.”
E) DATA SPLITS – ACCESS AND PARTICIPATION

You will recall that TEF metrics are split by a number of student characteristics. For this reason the latest set of guidance on access and participation agreements highlights where the OfS is putting its focus and may provide some insight into where the focus will be in future iterations of the TEF.

The core metrics aggregate the data for all students covered by that metric, over a three-year period. To indicate performance relating to different groups of students or areas of provision, the metrics are also split by year and by student characteristics (not all apply to all):

- level of study
- age
- sex
- disadvantage based on Participation of Local Areas (POLAR)
- disadvantage based on national indices of multiple deprivation
- disability
- ethnicity
- domicile
- entry qualifications

The OfS published guidance for institutions to produce their new Access and Participation plans for 2020/21. Key points include:

- The removal of the guideline percentage of how much of the higher fee income an institution should spend on widening participation, success and progression activities.
- The OfS has stated institutions can expect increased scrutiny, rigour and challenge on their plans, in part to kickstart the stagnation of social mobility. Including consideration of whether institutions are at risk of breaching their conditions of registration with the OfS.
- Focussed, evidenced, analysis of an institution’s current performance will link with the institution’s strategic aims and priorities for rectifying inequalities in access, student performance and attainment, and progression. The OfS will assess the feasibility of an institution’s aims and the appropriateness and challenge within the chosen targets.
- All targets should be outcomes based, rather than measuring outputs.
- A greater focus and breakdown on ‘investment’ (spend) is required for access measures. This fits with current Government rhetoric on ensuring widening access spend is effective and focussed towards the most efficient and successful outcomes (supported by robust evidence of impact).
- Evaluation, impact and research of widening participation interventions remains important.
- All providers are expected to use the POLAR measure (number of young local population that progress to HE) to provide a level of consistency and comparability. A national Access and Participation dataset is also expected to be published shortly.

The OfS has also set itself national key performance measures which address the inequalities they are most concerned about – the gaps that remain the most challenging to tackle and affect large
student groups. In order to meet these measures all institutions are expected to have a target which contributes towards improving outcomes in these KPI areas.

a. **ENTRY GAP** - Eliminate the gap in participation at higher-tariff providers between the most and least represented (POLAR) groups, from a ratio of 5:1 to a ratio of 3:1 by 2024-25.

b. **DROP OUT GAP** - Reduce the gap in non-continuation between the most and least represented groups (POLAR) – eliminating the unexplained gap by 2024-25, and eliminating the absolute gap (the gap caused by both structural and unexplained factors) by 2030-31.

c. **ATTAINMENT GAP** - Reduce the gap in degree outcomes (1sts or 2:1s) between white students and black students, eliminating the unexplained gap in degree outcomes (1sts or 2:1s) between white students and black students by 2024-25, and eliminate the absolute gap by 2030-31.

d. **ATTAINMENT GAP** - Reduce the gap in degree outcomes (1sts or 2:1s) between disabled students and non-disabled students by 2024-25.

The OfS acknowledges that other non-KPI measures remain important too - addressing the decline in the number of mature students in higher education and access, success and progression for care leavers.

Universities Minister, Chris Skidmore, gave his first speech on access and participation on the day the guidance was launched. His speech acknowledged the importance of the removal of the student number caps, spoke about the narrowing of the gap with more disadvantaged young student applying to university, whilst acknowledging:

- All this is good news and a welcome move away from the days when going to university was just for the fortunate few. Yet, we all know that behind the positive headlines lies a much more complex picture of inequality and progress is not as rapid as it should be.

- And that takes me on to the first point in my plan – namely that we now need a more nuanced approach to ‘access’ and a greater recognition of the true access gaps. Major themes I want to see the sector and the OfS addressing are geographic disparities and widening access for specific groups, including White working-class as well as Black and minority ethnic students.

Sam Gyimah, the previous Universities Minister, wanted disadvantaged young people to aspire to and enter the highest tariff institutions. Chris continues this challenge to the high tariff institutions to become more accessible and think beyond entry grades whilst acknowledging that high tariff doesn't necessarily mean best:

- I also want to reverse the trend of students from currently under-represented groups being less likely to apply to high-tariff universities. In 2018, 17% of students who were eligible for free school meals entered higher education in the UK. Yet only 2.7% of them enrolled at high-tariff providers. Now, I'm not saying that high-tariff institutions are necessarily the best option for everyone. Plenty of excellent lower-tariff providers offer students a first-rate education with exceptional graduate outcomes, and are the right choice for many. But what worries me is that some people may not be considering high-tariff providers even when they could clearly benefit from them – showing how prior social and educational experiences can all impact on an individual’s life choices. I am genuinely saddened when I hear people hesitating about applying to one of our world-leading providers because they simply don’t believe that going to a university like that is really for people like them...

The UK is blessed to have a diverse, multi-cultural society, and it is simply not right that, despite displaying obvious talent, some people still feel a ‘top’ university education is out of reach for them...

This is why I also welcome the fact the Duchess of Sussex recently added public prominence to this issue when expressing shock that too few professors in the UK are from diverse backgrounds. She is...
right – as she herself said, “change is long overdue”, and if we want our student communities to reflect our wider population, then we have to start thinking seriously about the role models and examples we are setting them.

Chris was stern on the effective use of WP monies, particularly making better use of evidence to inform spend:

- **£860 million** [the combined planned spend by universities on WP in 2018/19] is not an insignificant sum and, so, I believe it is essential that this money is used well, and that any future spending is underpinned by clear evidence and evaluation. Although some providers already do this, for too long the sector as a whole has been too slow in using evidence to inform its approaches and to understand what really works.

He also wants to see more collaboration across the sector:

- Despite numerous providers undertaking excellent work in the access and participation space, by and large, the sector has been too piecemeal in its approach and too many providers have got used to doing their own thing. I will be the first to admit that this may well be a logical consequence of policy development – with an emphasis on market-style activity, a lack of data-sharing, and too little infrastructure to encourage collaboration. But now is the time for this to change.

Finally, he turned to the importance of data and consistent, reliable measures to track progress in tackling disadvantage.

- When it comes to data, I know there is a saying that ‘what gets measured, gets managed’...higher education providers have focused less on the outcomes of their disadvantaged students than they should...Differing approaches have not helped. The key measure to drive widening participation in higher education has traditionally been POLAR...The POLAR system has many strengths, and the insight it has provided has helped lead to genuine progress in opening up access to university. Yet, it is also known that POLAR doesn’t always overlap well with other measures of disadvantage – such as eligibility for free school meals...the principal measure used in schools and forms the main basis for extra support and funding. He spoke of UCAS’ work to find new and better predictors of disadvantage in higher education that take account of much more than just where someone grew up. It’s also why I welcome the OfS’s commitment in its access and participation strategy to work with providers to look not just at POLAR, but other aspects of disadvantage to ensure this work can really transform the life chances of young people.

He also welcomed the Transparency Duty which requires institutions to publish data on the application, offer, acceptance, completion and attainment rates of students, divided by ethnicity, gender and socio-economic background:

- And on this, I further welcome the OfS’s requirement that providers set out their ambitions for improving access and participation for up to five years and report annually – something which I hope will keep everyone’s eye on the ball and prevent us from becoming complacent. He also spoke about the newly announced formation of a Data Advisory Committee stating it would help me ensure we are not only using the right data to shape the access and participation agenda, but are using it in the right way. I therefore look forward to working with the OfS, this Committee and the wider sector to find ways to refine and advance the data we use.

Universities Minister Chris Skidmore is a believer that disadvantage starts at birth and has committed to working with Nadhim Zahawi (Minister for Children and Families) to tackle disadvantage. He has announced they will be working together to improve support for care leavers throughout the whole education system, noting that only 6% of care leaver attend universities and are the most likely student group to drop out. He urged the OfS to do all they could to support care leavers.