

Fair Access Coalition: Augar review consultations

We were pleased to see the government response to the Augar review of post-18 education this year and are pleased that the government is consulting on some of the more complex proposals included in their response. Whilst we are disappointed not to be able to engage on the changes to student financing, which the government's equality impact assessment suggests will have a detrimental impact on groups such as those from disadvantaged backgrounds, we are keen to engage in a constructive response about the proposals that are being consulted on.

We agree with the statement that higher education should be available to all students with the desire to pursue it and the ability to benefit from it, regardless of their background. We would seek to hold the government in particular to the phrase "the ability to benefit from it". This will look different for each individual student with a myriad of factors determining the extent to which they can benefit from higher education and the impact it has on their later outcomes. This framing is contrary to some of the rhetoric and direction we have seen from the current government, and we would welcome a shift towards this more contextualised approach rather than requiring all students to meet certain standard, arbitrary outcomes.

We support the intended outcomes of the reforms, although the tone is not necessarily continued in the more detailed sections of the consultation document. There are a multitude of ways in which the government can seek to encourage a flexible and fair system with parity between technical and academic routes and encourage levelling up across the country, but placing unnecessary and arbitrary limits on higher education is not the route we would recommend. Education is a common good, and we should instead approach these issues from a view of expansion to ensure everyone has the high-quality offer and provision they need to succeed, rather than reducing availability and increasing competition in an already unequal system. We fear that approaching these issues from a perspective of scarcity will only lock more young people from disadvantaged backgrounds out of the system and out of the impactful opportunities higher education can offer.

We are pleased to see the consultation documents explicitly reference a desire to promote genuine social mobility and provide genuine opportunities to improve life chances for those with the prior attainment, ability, and the will to pursue them. There is nothing to disagree with in those statements, but we would urge the government to go further and seize the opportunity that the response to the pivotal Augar review offers. The access gap does not exist because young people from disadvantaged backgrounds have lesser ability or will with regards to their education, although we would acknowledge the role of the attainment gap, despite our not believing this to be the responsibility of the student. We have the opportunity to move beyond the old adage of helping a few individual students to go against the mainstream and overcome the structural inequality embedded within our education system to act as an example of the possibility of doing so. We can instead use this opportunity to place the onus on these barriers, on the support available and on the admissions processes of institutions who continue to enrol very few students from disadvantaged backgrounds.

We would also seek to expand what the consultation documents refer to as the "core aim of higher education" which is to equip students with the skills and knowledge they will need to succeed later in life. We would add "experience" to this too, acknowledging that higher education is not only about the degree that the student gains, however important, but it also about the additional social and cultural aspects that employers look to and which enable graduates to live fulfilling lives and contribute meaningfully to society.

Question 1: what are your views of SNCs as an intervention to prioritise provision with the best outcomes and to restrict the supply of provision which offers poorer outcomes? Please explain your answer and give evidence where possible. If you consider there are alternative interventions which could achieve the same objective more effectively or efficiently, please detail these in your submission.

We recognise the desire to regain some control in an increasingly marketized higher education system. Despite many advantages, the current format of the system has allowed some providers to prioritise the need to grow and access tuition fee funding leading to a “bums on seats” agenda sometimes being prioritised over student choice, autonomy, and high-quality provision. We have seen this appear in practices such as conditional, unconditional offers that have been detrimental to young people from disadvantaged backgrounds. The intentions behind this proposal are, therefore, understandable. But student number controls are not the answer and would worsen not improve fair access.

Despite best intentions, through the inevitable impact student number controls have on admissions, they are often detrimental to fair access. We know that when places for higher education become more competitive, it is those from disadvantaged backgrounds who lose out. We have seen that, even as higher education has expanded in recent years and more students from every group are attending, it continues to be those from advantaged backgrounds who have disproportionately reaped the benefits of this expansion. As such, whilst access rates grow, the access gap has widened further. This trend does nothing to assuage concerns that, in a controlled system, those from advantaged backgrounds would continue to occupy a disproportionate number of places, leaving those from disadvantaged backgrounds to compete over an increasingly limited number of places. It is much easier, in all parts of the debate, to advance access when it is part of growing provision, rather than replacing existing student demographics with those who have historically not engaged with higher education.

This issue is exacerbated when we consider *which* provision will be limited and which will be prioritised. The binary of “best” and “poorer” that is proffered in the question is not clearly defined and belies a much more complex pattern. It is important to consider what provision is categorised in these areas and determine what needs it is meeting for student, institution and broader society, and which groups it is providing for. There is always the option to focus on improving such provision categorised as “poorer” – as is intended with the Office for Student’s proposals on their B3 condition – rather than immediately move to limit it. There could be severe unintended consequences of such a move for certain groups or communities. Without clear definition, it is difficult to determine what impact the proposal would have, but historically we know that it is not the more prestigious universities who tend to lose out in these proposals, despite having some of the poorest access rates in the country. Recent [Sutton Trust research](#) does an excellent job of considering both access rates and outcomes in universities, providing an indication of which institutions are achieving great outcomes at the behest of poor access rates. It is important this is given due consideration should student number controls be implemented.

Whilst uncoupled from any proposals to incentivise improvements in quality provision where outcomes are poorer, or from Access and Participation Plans, we fear that institutions will continue to implement processes that enable them to grow and therefore access greater funding. There is a real risk that fair access efforts will be hampered, particularly by less wealthy institutions, in an effort to limit the impact of student number controls and therefore

provide institutions with greater access to tuition fee funding. As a standalone proposal, without mitigations, this could be catastrophic for access.

Creating a system which supports provision which has historically benefitted more advantaged groups of young people, or which incentivises provision to target more advantaged groups of young people, will create further imbalance in the system. The solution is to help better provision improve access, and poorer provision improve quality, not to limit student numbers, placing the onus on the student, rather than the institution.

Question 2: what are your views on how SNCs should be designed and set, including whether assessments of how many students providers can recruit should be made at: sector level; provider level; subject level; level of course; mode of course.

Overall student numbers controlled at sector level where individual providers are set the total number of students they can recruit as their share of the aggregate total.

Whilst opposed to the premise of SNCs, if they are to be introduced, we believe that sector level would be the most constructive option. This ensures that the impact is balanced across the sector and does not disproportionately burden institutions that cater to a more diverse, often underrepresented population or serve small communities, or to subjects or course levels which serve underrepresented groups.

We would encourage inclusion of access rates in the factors which determine the share each institution is allocated, so that the institutions doing the most to close the access gap are supported to continue doing so.

Individual providers could be set the total number of students they can recruit with provision for certain subjects allowed to continue to grow

It is unclear in this potential approach how the number for each individual provider will be determined, or whether it will be a standard number set across all institutions. If certain subjects are enabled to grow, we would recommend considering what needs certain subjects are meeting at specific institutions and what groups they are serving. There is a risk that smaller providers who may be catering to more underrepresented groups are penalised under this approach, or that subjects which cater to underrepresented groups are limited and become more competitive.

An existing barrier in the current system towards greater access to higher education is high-quality information, advice and guidance. Creating a system in which number controls are implemented on certain subjects at certain providers, generating differing levels of competitiveness, adds further levels of complexity for young people to navigate. In new levels of complexity, those from more advantaged backgrounds often navigate the changes more easily because of greater resource and, therefore, they benefit disproportionately.

Individual providers could be set the total number of students they can recruit for certain subjects based on an assessment of student/graduate outcomes for each subject at a national level

Basing student number controls on student and graduate outcomes for each subject level at a national level risks a higher preference for those traditionally favoured by more advantaged students who we know achieve higher outcomes due to the benefits they have received

earlier in the system. If certain subjects are enabled to grow, we would recommend considering what needs certain subjects are meeting at specific institutions and what groups they are serving.

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Individual providers could be set the total number of students they can recruit for certain subjects based on an assessment of student/graduate outcomes at each individual provider.

Determining student number controls based on outcomes at an individual provider holds the same risk that the Office for Students proposed thresholds created – institutions will be incentivised to take on more advantaged students who we know achieve higher outcomes due to the benefits they have received earlier in the system. However, this proposal does not have the counteracting measure that the Office for Students' proposals did in simultaneously setting high standards for what institutions should provide to their disadvantaged students. We risk institutions targeting and recruiting students who are more likely to generate higher outcomes, most often from advantaged groups, and limit their intake of students from disadvantaged backgrounds. This would be grievously detrimental to access.

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Question 3: what are your views on the merits of these various approaches to consider outcomes and/or do you have any other suggestions?

We were pleased to see a much more comprehensive concept of outcomes than has occurred in other government and body consultations, and particularly one which moves beyond earnings and entry into specific professions and instead considers the wider contribution graduates make to society post-higher education.

An important approach that has not been given due consideration is the role of student choice. It is important to remember that students are individual people with lives, aspirations, plans, goals and, most importantly, autonomy. [UCAS research](#) delving into student choice demonstrates the complexity of this process, with one in three applicants first considering higher education at primary school, 99% basing choices on their enjoyment of a subject, and post-16 choices having a strong influence. To best support these choices, students should be given the support they need to make informed choices that work for them, rather than predetermining such choices ahead of time in a centralised manner. Instead, consideration must be given for how different institutions and courses can appeal to students, expanding rather than limiting choice and ensuring students' interests and aspirations can be aligned with labour market needs rather than set at odds with them. (This means the availability of

higher education should be neither solely be a question of student demand nor solely 'employer-led', but rather a balance between the two).

Question 4: do you have any observations on the delivery and implementation of SNCs, including issues that would need to be addressed or unintended consequences of the policy set out in this section?

As discussed in response to earlier questions, there are significant unintended consequences around admissions, access and supporting underrepresented groups to succeed in higher education. If uncoupled from any proposals to incentivise improvements in quality provision where outcomes are poorer, or from Access and Participation Plans, we fear that institutions will continue to implement processes that enable them to grow and access tuition fee funding. There is a real risk that access initiatives will be hampered, particularly by less wealthy institutions, in an effort to limit the impact of student number controls and maximise funding opportunities. As a standalone proposal, without mitigations, this could be catastrophic for access.

In addition to implementing mitigating practices and tying proposals to access monitoring, a key implementation necessity is to consider impact on a granular level to ensure important provision that is supporting a place, group of students or particular need is not eradicated. Blanket assumptions cannot be made in a sector as diverse as higher education and, whilst we appreciate the time and resource implications of such a granular consideration, it is vital to ensuring there are not unintended impacts on underrepresented groups.

Ultimately, we do not believe that student number controls are where focus is best placed and believe they will do more harm than good. Instead, we encourage the government to look at incentives to improve access and quality provision to limit the perceived need for student number controls, and to consider initiatives whose impact will be felt by institutions, rather than the student body.

Question 5: do you agree with the case for a minimum eligibility requirement to ensure that taxpayer-backed student finance is only available to students best equipped to enter HE?

It is crucial that young people are prepared for higher education and are not set up to fail – we fundamentally agree with this premise. However, using minimum eligibility requirements to determine this falls short of our experience of what works in preparing young people from disadvantaged backgrounds for higher education and what their needs are both beforehand, in the transition and once they are there. We would question whether the proposed minimum eligibility requirements alone could determine preparedness of a student for higher education. Increasingly, higher education institutions are seeing the benefits of considering students on a more individual, contextualised basis, taking into account the many factors that may have contributed to their past achievements and considering their potential in addition to these. Such a rigid focus on specific assessments is reductive to the many factors that contribute to university-readiness.

Minimum eligibility requirements will disproportionately impact students from disadvantaged backgrounds, putting the responsibility for the attainment gap on their shoulders, rather than the structural barriers and failings of an unequal education system. Organisations like our members, who have worked with these young people, know that they do not receive lower grades because of lower ability or potential, but rather because they are not afforded the

same support as their better-off peers and they are operating in a system which is set up to work for those better-off peers. Setting minimum eligibility requirements at a level where we have ample evidence that young people from disadvantaged backgrounds will be penalised would be counterintuitive to progress made on more young people from these backgrounds accessing higher education, widen the access gap further, and works in direct opposition to the Levelling Up goals.

We are opposed to this measure but, should minimum eligibility requirements be implemented, they must be coupled with significant resourcing of attainment-raising to ensure the support needed is in place for young people from disadvantaged backgrounds to meet these requirements. There are some existing avenues to provide this, through the National Tutoring Programme and the Office for Students' renewed focus on raising attainment as part of higher education institutions' widening participation initiatives. The work of many of our organisations focuses on raising attainment and should be utilised to support this initiative.

Whilst we understand the need to ensure institutions remain autonomous with regards to admissions, and this is why the requirements are linked to student finance, in reality this means that those with sufficient resources are not limited by such requirements. Whilst the numbers of students who self-fund are small – although those with the resources to self-fund if necessary are likely more numerous – this ensures that the requirements are not universal and penalises those from poorer backgrounds. Again, this is counterintuitive to progress made on more young people from these backgrounds accessing higher education, widen the access gap further, and works against the Levelling Up goals.

It is also important to note that less than 10% of students currently reaching higher education are doing so without meeting these requirements. It is a rare feat to reach higher education without either Level 2 in English and maths or two Es or equivalent at A-level. Those who do, particularly those from disadvantaged backgrounds, are likely to have experienced mitigating circumstances when being assessed, meaning that their grades are not truly reflective of their ability or potential, or they have received significant support and undertaken immense amounts of hard work to get there. Neither of these groups are those we should wish to exclude from higher education, indeed the very opposite; their efforts should be applauded.

Question 6: do you think that a grade 4 in English and maths GCSE (or equivalent) is the appropriate threshold to set for eligibility to student finance, to evidence the skills required for success in HE degree (L6) study?

Whilst we are opposed to the implemented of minimum entry requirements at any level, achieving grade 4 in English and Maths GCSE (or equivalent) is our favoured option. This is because [Impetus' research](#) has shown how pivotal these qualifications are in determining later outcomes for young people, whether they advance to higher education or not. Importantly, however, the research finds those with these qualifications have higher pass rates at degree-level, suggesting they are a useful barometer for indicating success in higher education (with the caveat that this is because those who do gain these qualifications were more likely to pass their degree). If there is to be an arbitrary focus on certain qualifications, we would prefer them to be at this stage as we would expect this to incentivise greater resource towards provision and support for GCSEs and equivalent with the hope this would increase the rates of young people gaining these qualifications. Whilst we do not acknowledge that they alone indicate preparedness for higher education, in the current system they are one of many indicators which can prove useful.

Setting the minimum eligibility requirements at Level 2 also enables the implementation of exemptions for those achieving Level 3 qualifications and allows more time and flexibility for students either to gain the Level 2 qualifications or demonstrate sufficient ability at a higher level. We would be keen to embed as much flexibility as possible to allow students to demonstrate their preparedness in other ways should they not meet the minimum eligibility requirements.

Question 7: do you think that two E grades at A-level (or equivalent) is the appropriate threshold to set for eligibility to student finance, to evidence the skills required for success in HE degree (L6) study?

Whilst we appreciate the recognition in the consultation documents that this option does not have the subject specificity of gaining a Level 2 in English and Maths and therefore is more flexible, this does not align with the narrative around preparedness in numeracy and literacy that the minimum eligibility requirements at Level 2 are more likely to achieve. This later stage also limits the flexibility available to demonstrate preparedness in other ways should the grades not be met.

Given the importance of gaining a Level 2 in English and Maths to [later outcomes](#), we believe this to be a better place of focus should these requirements be implemented.

Question 8: do you agree that there should be an exemption from MERs for mature students aged 25 or above?

Whilst our organisations are concerned with young people from disadvantaged backgrounds and therefore our views on mature students is limited, we do recognise the importance of encouraging those who are younger to retake certain qualifications, given the impact we know these can have on later outcomes, as per [Impetus's research](#).

Question 10: do you agree that there should be an exemption to the proposed MERs for students with existing level 4 and 5 qualifications?

We do agree with this proposal. A young person should not be held back by earlier qualifications assessed at a lower level when they have gone on to succeed at higher levels of qualifications. Instances of these indicate that past achievement is not always indicative of ability to succeed, and we would cite the requirement for such an exemption as evidence that setting rigid, arbitrary requirements at any level of assessment is not conducive to ensuring well prepared students.

Question 11: do you agree that there should be an exemption from any Level 2 eligibility requirement to Level 6 study for student with good results at Level 3 (CCC or above)?

We do agree with this proposal. A young person should not be held back by earlier qualifications assessed at a lower level when they have gone on to succeed at higher levels of qualifications. Instances of these indicate that past achievement is not always indicative of ability to succeed, and we would cite the requirement for such an exemption as evidence that setting rigid, arbitrary requirements at any level of assessment is not conducive to ensuring well prepared students.

Question 12: do you agree that there should be an exemption to MERs for students who enter level 6 via an integrated foundation year, or who hold an Access to HE qualification?

We do agree with this proposal. Young people who access an integrated foundation year or an Access to HE qualification are most likely to be from underrepresented groups who have overcome additional barriers in their journey to higher education. We should be ensuring these efforts are not futile, and instead set these young people up for success in higher education.

Having gone on to succeed in either an integrated foundation year or an Access to HE qualification, a young person should not be held back by earlier qualifications assessed at a lower level when they have gone on to succeed at higher levels of qualifications. Instances of these indicate that past achievement is not always indicative of ability to succeed, and we would cite the requirement for such an exemption as evidence that setting rigid, arbitrary requirements at any level of assessment is not conducive to ensuring well prepared students.

Question 13: are there any other exemptions to the minimum eligibility requirement that you think we should consider?

We believe that exemptions should be put in place for the students we discussed in our earlier answer, who are accessing higher education despite not possessing the proposed minimum eligibility requirements.

Mitigating circumstances at the time of assessment should be taken into account as an exemption to standard minimum eligibility requirements as these can massively influence performance and result in awarded grades not truly reflective of the ability of a student. In this respect, particular regard should be paid to students with Special Educational Needs or Disabilities as these may entail particular challenges in meeting minimum eligibility requirements without being a relevant indicator of ability to thrive in higher education. For example, dyslexia might make it especially hard for a student to pass GCSE English, but would not necessarily have any bearing on their ability to study Engineering. Similarly dyscalculia might make it difficult to achieve a pass in Maths, but might not prevent a student from succeeding in a Law degree.

We also believe that students who have received a recognised programme of support, such as that provided through our organisations, should be recognised as achieving preparedness through other avenues available to them to ensure that those who can succeed with the right support are able to do so.

We would encourage any minimum eligibility requirements to be contextualised based on certain flags such as free school meal eligibility, care leaver status and estranged students. The gaps in attainment between young people from disadvantaged backgrounds and their better-off peers are not caused by lower ability but rather structural inequalities in our education system. They should not be penalised or have future opportunities limited because of a policy that puts the responsibility for these failings on the individual student, rather than the system.

Question 14: do you agree with reducing the fee charges for foundation years in alignment with Access to HE fees?

Throughout the consultation document, foundation years and Access to HE diplomas are treated as equal, almost duplicative routes, ignoring what these two distinct routes offer. They both serve different groups of people with distinct needs depending on where they sit on their journey towards higher education and what barriers they seek to overcome. Foundation year fees reflect the more intensive nature of the route and the on-campus

experience they provide, to much benefit in terms of demystification of higher education and sense of belonging. Lowering their fees risks reducing provision and quality and making this vital access route unnecessarily more competitive.

It is also important to note that Advanced Learner Loans are not comprehensive and often will fail to cover the true living costs of taking part in an Access to HE diploma – this issue is only exacerbated given the full-time, residential nature of foundation years.

Question 15: what would the opportunities and challenges be of reducing the fee charges for most foundation years and of alignment with Access to HE fees?

Without adequate research, we cannot say for certain that students will find foundation years more appealing if the fee charges are reduced, although it stands to reason that this may be the case for some. However, more than anything, this speaks to the lack of transparency and clarity around the student finance system and the often limited understanding of what funding is available and how it will be repaid as a consequence. The opportunities therefore may be incredibly limited.

By reducing the fee charges, however, there are great challenges. As discussed above, a reduction in fees risks reducing the provision and lowering the quality of what is made available, when these courses are inevitably resource-intensive to successfully support the young people who benefit from them. This reduction in provision and potentially quality may result in *fewer* young people utilising this path as a route into higher education (without a parallel uplift in Access to HE courses) and thus a decrease in access. Finally, further distinguishing this year from the rest of an undergraduate degree – and those who move straight into an undergraduate degree – may only serve to increase potential stigma around this route and further alienate it, and the students who undertake it, from the wider university population and experience.

It should also be noted that reducing the fees for foundation years would not constitute alignment with Access to HE courses because students on the latter courses have the fee written off when they progress to a higher education qualification. This difference properly reflects varied purposes of the two pathways and, potentially, it means that Access to HE course entail a higher cost to the public purse than foundation years rather than a lower one.

Question 16: do you think there is a case for allowing some foundation year provision to charge a higher fee than the rest? Or is there another way for government to support certain foundation years which offer particular benefits?

In principle, we are opposed to the idea of certain provision charging a higher fee than others. We would be more inclined to support other ways for the government to support certain foundation years either through additional funding, however greater clarity over the term “particular benefit” would be needed to understand the true impact of this.

There is a real risk in creating differential fees across different foundation years because of the potential differences this will create in terms of quality and provision that are perhaps not wholly transparent or visible to the student. Different fees may also lead some students towards different foundation years than they may initially have believed best fit, an incredibly significant choice, given the lack of transferability and the pivotal role the institution plays in the experience.

Question 17: if some foundation year provision were eligible to attract a higher fee, then should this eligibility be based on: particular subjects such as medicine and dentistry or some other basis e.g. by reference to supporting disadvantaged students to access highly selective degree-level education?

Foundation years play a crucial role in getting young people to high-tariff universities where the entry requirements are more competitive, but these institutions are also those where we see the lowest proportions of young people from disadvantaged backgrounds attending. Creating a higher set of fees for these universities may only serve to make them appear more unattainable and to decrease any sense of belonging. Whilst we exist in a marketised higher education system, we saw this idea of different levels of fees fail with the implementation of £9,000 fees, with the expectation that only those offering the highest quality provision would charge the top fees. In a system where different fee levels have not been achieved, we cannot assume that it will be clear and transparent why high-tariff universities are charging higher fees. This proposal also acts on the assumption that high-tariff is the best for every student or is truly reflective of quality. Whilst we absolutely should work to ensure more young people access these institutions, we should not automatically expect all students to see them as the better option and, thus, worth the higher fees.

Whilst targeting specific institutions or courses may work, this should be done through alternative streams of funding, rather than creating a distinction for students. Ultimately, differing levels of fees for foundation years are not where our focus should be in terms of improving them as an access route.

Question 18: what are your views on how the eligibility for a national scholarship scheme would be set?

We have engaged with the Department for Education directly on what the national scholarship scheme could look like and include some of our thoughts below.

It is important to recognise that there is no fixed definition of high-attaining and attainment is always contextual. It is crucial that, when considering this, the eligibility contextualises attainment within schools and geography. Rather than a set, universal threshold, eligibility could consider attainment within a student's school's results, or within a geographic region. Failing to embed this contextualisation would risk a London-centric scholarship scheme, as we know attainment and access to higher education is higher in the London region, and this would not target the scheme at those who need it most and would be at odds with the government's Levelling Up agenda. Similarly, one of the reasons London's access rates are so high is the ability for students to commute. Many young people from disadvantaged backgrounds commute to university – at higher rates than their better-off peers – but it is important to consider how this scholarship scheme can open up the opportunities for students to study further afield where financial concerns may have held them back.

Whilst there are better ways to define high-attaining to increase impact and ensure it is implemented in the most constructive way, we would also challenge the role of high attainment in ensuring eligibility. Those with high attainment are already much more likely to go to university and have overcome the biggest barrier to access: attainment. The Sutton Trust quantifies high-attaining students from disadvantaged backgrounds as approximately 1,000 students in each year group, or approximately 4% of the free school meal eligible cohort studying at Level 3. Whilst we do not suggest eliminating them from a scholarship scheme, we believe that to have the greatest impact the eligibility should be broader than just high-attaining students.

Rather than placing the onus on student eligibility, another perspective is to consider the role of universities and whether all universities would be open for eligibility around the scholarship or whether they would have to meet certain criteria. Within the information about the national scholarship scheme, there is mention of “high-quality” without clear definition and it would be crucial to ensure this is broad-ranging and takes many perspectives on high quality – beyond graduate earnings and professional employment – to ensure that young people are not nudged into courses or towards institutions they may not have initially wanted to go to. The scholarship scheme should empower young people’s choices, not decide them for them. It is also important to consider access rates within high quality and ensure that universities that do good work on access and success are not penalised within the scheme. Finally, it is important not to duplicate existing provision within universities. Oxbridge in particular, but also many other Russell Group universities already have existing financial provision for students from lower income backgrounds and, to have the biggest impact, the scholarship scheme should focus on institutions that do not have the resources to offer this provision themselves.

In terms of timing for students to learn of their eligibility, it is crucial this is made at a point where it can inform decision-making. A vital part of scholarships is to broaden available decision-making and empower young people to make decisions that previously were not available. We would encourage a mechanism that allows students to determine their eligibility for the scheme when deciding whether to go on to higher education before any choices about institutions or courses have been made.

Whilst we applaud the intentions behind the national scholarship scheme, in light of the current cost of living crisis and the ongoing issues with maintenance costs, this is not the comprehensive proposal we need to ensure all students have the resources to succeed whilst in higher education, particularly without risking penalising themselves through additional, paying work. The funding provided does not offset the vast financial differences many students experience in terms of maintenance costs and does not offset the failure to reinstate maintenance grants.