



David Collinge
Higher Education Analysis
Department of Business, Innovation and Skills

23 September 2013

Dear Mr Collinge

Thank you for giving us the opportunity to respond to this consultation. The view that we would like to convey to you doesn't quite conform with the consultation questions, and so we hope that you will not object to our response in the form that we provide below.

We would agree that the FYPSEC is not very useful as a metric for measuring the progression of disadvantaged groups to higher education for all of the reasons that you discuss in your consultation paper. However, and as also noted in the consultation paper, we are concerned that the FSM measure

- (a) focuses on the progress of children from households with incomes of below c.£10-15,000, and so ignores a large number of students from households with incomes below the national average who might still be regarded as disadvantaged
- (b) only records those students who have claimed FSM, rather than those who were eligible, and so is not even a complete measure of the group that it focuses on
- (c) will exclude mature learners

Additionally:

- (d) there will be a four year time-lag between the point at which a student is identified as having claimed FSM and the point at which they go into higher education, during which period significant changes to family circumstances could have occurred
- (e) the promotion of FSM and the system by which students apply for it varies at local authority level which means that any attempt to drill down on data at a regional or local level will introduce extraneous factors

Given these serious flaws we would therefore be extremely concerned if FSM data were produced at institution level and used as, for example, a HESA Performance Indicator.

It is suggested that a metric be introduced using the FSM measure which would relate to the 'most selective third of universities' rather than individual institutions. We note that the 'most selective' will require careful definition, and on some measures (eg average grades on entry) this may change each year. Depending upon which HEIs are included in the top third, adjustment would need to be made for qualifications taken at Level 3 (since for example less than 10% take A Levels), attainment and subject mix (since many students will not meet the admissions standards of selective institutions). We also note that on an institution-by-institution and course-by-course basis entry requirements and application patterns differ widely. Thus there is a considerable risk that a data homogenisation exercise of the sort proposed will produce measures that are meaningless or, worse, potentially misleading and damaging.

Yours sincerely

Jon Beard

Fitzwilliam House
32 Trumpington Street
Cambridge CB2 1QY
Tel: +44 (0) 1223 333308
Fax: +44 (0) 1223 746868
Email: admissions@cam.ac.uk
www.cam.ac.uk/admissions/undergraduate/