Access and participation plan: student submission template

Name of university or college:	University College London
Date submitted:	31/05/2024
Name of person leading on this submission:	Shaban Chaudhary
Role (if relevant):	Education Officer
Email address:	e.officer@ucl.ac.uk

Please ensure that you maintain independence from your university or college when completing this submission.

Summary

Are you satisfied that your university or college has provided you with access to sufficient information and data to complete the student submission?

Students' Union UCL is satisfied that the university has provided sufficient access to the information and data required to complete the student submission. Students' Union UCL and our sabbatical officers were given access to UCL's APP and, later, additional appendices and evaluation documents. We would also have appreciated access to further documentation, including more impact reports, planning materials and strategy documents, such as the institutions theory of change narrative. These materials would have enabled the us and our officers to make better judgements concerning questions of 'risk', 'ambition', and 'credibility'. As outlined below we were kept informed as to the design and development of the plan throughout UCL's governance structure, with the Education Officer sitting on UCL's Student Access and Succes Committee, Education Committee, Academic Board, and Council. This close relationship enabled deeper and more confident engagement with the plan that might otherwise have been possible.

Approach

Can you tell us briefly how this student submission was put together, for example your approach to gathering the views of different students?

Students' Union UCL, as the representative channel between UCL students and university, and our sabbatical officers, principally the Education Officer, in their capacity as representatives elected by the student body, took responsibility for the coordination of the student submission.

We worked closely with UCL in the preparation of this submission. For example, we were invited to join two UCL-organised focus groups dedicated to the plan, one attended solely by sabbatical officers and the other attended by 12 students from the wider student body. Students and student representatives were provided with a briefing document ahead of these focus groups to ensure adequate knowledge of the APP, the gaps identified by UCL, and associated intervention states. We further organised our own two focus groups, each attended by seven students, to gain further insight. One of these focus groups was advertised via UCL Careers Extra, a programme within the UCL Careers Service supporting students who have entered UCL through a WP route, thus allowing for greater insight into the views of the students that the APP hopes to most impact.

Evidence

Please list any evidence sources referred to in this submission:

The primary sources of evidence used to inform this submission were the UCL APP itself, including appendices, and insights gained from focus groups. We were also provided with additional evaluation documents from UCL which enabled more a comprehensive judgement of the 'credibility' of some activities.

Further data was taken from the Russell Group Students' Unions' 'Cost of Living Report' (2023) and the recent HEPI report 'A Minimum Income Standard for Students' (2024) to justify our judgement of UCL's bursary scheme.

Finally, our Student Priorities for Wellbeing Report which is an aggregation of sector research, Student Priorities for Education Report (2024) which reflects the views of our networks of nearly 2000 academic representatives and thematic focus group, and Students' Union UCL's Advice Service's annual insight report were used to inform our judgement of continuation and attainment targets and interventions.

Commentary

To what extent do the student body think that:

- Your university or college has identified and focused the plan on its greatest risks to equality of opportunity?

We believe that UCL has successfully identified some areas of risk to equality of opportunity for specific groups and focused the plan on these. The plan's focus is limited predominately to disparities of access and attainment between socioeconomic groups, the continuation of mature students, and differential attainment between students from different ethnic backgrounds. These groups were selected following broader analysis of all gaps which was shared with us early in the plan's development process. Reasonable risks to equality of opportunity that these groups might face are identified from the OfS' Equality of Opportunity Risk Register (EORR). These risks are largely aligned to the views of UCL students: risks related to the perception of higher education at UCL specifically in terms of the diversity of socioeconomic and ethnic backgrounds of students were central themes arising from our focus groups conducted for the student submission.

Our primary concern, and one echoed in the APP itself, is the degree to which area-based measures, such as IMD, are used to guide the setting of objectives and targeting of initiatives which intend to address socioeconomic disparities. Within the plan, IMD is used to justify certain claims, such as the underrepresentation of White students from IMD quintiles 1 and 2 at UCL being equated with a lower proportion of disadvantaged White students in London. While we welcome the use of IMD, which is significantly more appropriate to the London-context than POLAR and recognise that the use of these area-based measures are encouraged by the OfS, it is well known that area-based measures generally are not well-suited to London where there are greater disparities in wealth and relative advantage between neighbours. There is therefore a risk that that UCL's use of area-based measures will lead to certain groups in London, from where UCL recruits over half of its UK undergraduate cohort, being overlooked. The potential negative consequences of the reliance on area-based measures are perhaps reflected in the OfS access and participation data dashboard. The dashboard demonstrates that only 14.3% of UCL's 2021/2022 UK undergraduate intake were eligible for free school meals—a maker of individual disadvantage as opposed to an area-based measure. This represents a 4.1% difference between UCL and English HEPs more broadly, and a 4.2% fall in UCL's intake of entrants who were eligible for free school meals from the previous year. Further, it is surprising that cost pressures are not cited as a potential risk for socioeconomic disparities in accessing UCL, given the cost of living and studying in London. The cost of living in London or, for those already resident in Greater London or its environs, often long and expensive commutes to campus were also pressing issues arising from our focus groups. The cost of commuting is such a prevalent concern that, prior to the recent election, we called upon the next London Mayor to introduce free bus travel and cap the cost of all tube journeys to zone 1 prices for students.

We found UCL's justification for dismissing the access gap for mature students unconvincing. UCL states that this gap is largely driven by the institution's full-time teaching provision. While it is likely true that mature students might be attracted to evening or part-time learning or otherwise more flexible learning, this is an oversimplification which neglects pedagogical or pastoral issues related to information and guidance, knowledge and prior skills, and perceptions of higher education, as per the EORR, which may also be factors in the continuation and attainment gap between these students and younger UCL undergraduates. Further, the impact of prior perceptions of HE and the absence of prior knowledge and skills may be factors in continuation and attainment gaps more broadly, a possibility that is not articulated in the APP.

Available time, and lack thereof, was a recurring theme of our Student Priorities for Education Report 2024, which presents the views of the wider UCL student body. We found that many students expressed concern that modules were too fast paced, with students struggling to absorb large volumes of content covered in lectures. One student representative commented that 'lectures are teaching too fast and there is a lack of explanation', while another stated that 'the module is too fast paced and challenging for those in the cohort.' Some students commented that this led to the workload causing increased stress. The issue of a high volume of reading requirements was also raised, linked to the delivery of content in a short space of time. Additionally, students commented that lectures often run over the allocated time and that there was sometimes a disconnect between content taught in lectures and topics covered in seminars. One student stated that

'students have found the weekly reading requirements overwhelming', and another that 'some module tutors were not keeping to the UCL hour'. The 'UCL Hour' is a UCL policy whereby all teaching and meetings should last 50 minutes instead of an hour so staff and students can have time to move between classes and meetings.

The 2023 Student Academic Experience Survey demonstrates that an increased volume of workload is an issue impacting students across the sector. The survey found that the average number of working hours completed, having stayed fairly stable between 2019 and 2022, increased significantly from 30.7 hours in 2022 to 33.4 hours in 2023. This represents 'the highest number of workload hours (scheduled or attended) in any recent year'. The report stresses that 'it is important that workload volumes are realistic', particularly 'in the face of increasing time in paid employment'.

The concentration of teaching in a short space of time is a problem acknowledged in the UCL 2022-27 strategic plan, which recognises 'the lack of new teaching in Term Three' and the need for 'spacing the undergraduate year out more consistently'. Additionally, research, for example the Russell Group Students' Unions' 'Cost of Living Report' (2023) and the recent HEPI report 'A Minimum Income Standard for Students' (2024), demonstrates that the majority of undergraduate students now face no choice but to work an ever-increasing number of hours alongside their studies in order to support even a basic standard of living. Many students are also now opting to live in the family home to lower costs. Between commuting and work commitments, even full-time undergraduate students would benefit greatly from a more flexible teaching provision.

Finally, while it does not appear on the EORR, our focus groups demonstrated that a lack of a sense of belonging was a barrier to both access and participation at UCL. Some students commented that the perception they had of UCL prior to application (i.e. that the majority of their peers would be from advantaged backgrounds) were confirmed rather than dispelled upon entry. These challenges to a sense of belonging are replicated within UCL's access and outreach programmes. UCL's Access and Widening Participation Impact Evaluation Report 2022-2023 demonstrated that while UCL's access programmes where very successful at making student's feel confident in applying and fitting in the university in general (with an average score of 95% agreement), these figures are almost consistently, and sometimes considerably, lower when they are asked about UCL specifically, falling to an average of 88%. This is especially the case for visits from or to UCL and longer-term programmes where the figures stand at 93% and 82% respectively implying that perhaps more could be done to combat negative perceptions of UCL. Further, a thematic analysis of SSCC comments found student views on induction were divided, with 39% of comments expressing positive sentiments and 58% negative sentiments. Where students expressed negative sentiments, it was often due to a desire for additional induction events as they felt the current provision was insufficient. Students also reported that there was not sufficient information regarding academic expectations or knowledge required before initial lectures. Similar themes emerged from our APP student submission focus groups, with students criticising the lecture-based approach of some departmental induction activities which hindered peer to peer contact. This implies a need for greater transitional support and broader cultural change at UCL.

- The intervention strategies outlined by your university or college seem a credible way to address these risks? For example, they are based on credible and relevant evidence and student insights.

We found it challenging to feel confident in our judgements of the intervention strategies outlined in the plan. For example, it is unclear how UCL will ensure that the Access Initiatives Fund is used appropriately or how it will ensure that departments are incentivised to use it. This intervention appears to rely on individuals in departments taking the initiative to develop such programmes rather than institutional level targeted intervention. Generally, the approach to subject specific interventions appears inconsistent, with core UCL activity in these areas apparently limited to year 12 learners. This seems shortsighted. By year 12, learners will have selected their A-levels, or equivalent, and therefore, whether intentionally or not, limited their subject choices at HE. We believe that it would be more impactful to develop more robust subject level interventions at GCSE level and below. The plan itself contains little justification for this approach and we received no impact data associated with them.

The evaluation documents received from UCL are limited to the bursary scheme, the impact UCL's contextual admissions scheme (Access UCL), and a broad review of UCL's Access and Widening Participation Office's participant engagement. In some cases, these evaluations suggest that the interventions described in the APP could be better targeted. For example, the five-year review of Access UCL suggests that applicants of the scheme who go on to use the lower grade offer (rather than exceeding it to meet the standard offer) are at significantly greater risk of non-continuation or of not obtaining a 2:1 or above. However, the APP does not specifically target this group, treating Access UCL entrants as a single entity. Further this report highlights that Access UCL students do not wish to be singled-out from their cohort, yet we would argue that, in addition to creating additional burden of time and effort, UCL's proposed pre-enrolment for this group does exactly this.

Additionally, many interventions targeting attainment and success appear to rely on the training of staff and the production of resources for these staff members with little clarity as to how UCL will ensure these provisions are adequately engaged with. While we recognise that UCL is constrained by the APP's page limit, given that much of these intervention strategies are expanded or existing activity, we would have appreciated more justification, in the plan itself or through impact reports, for these approaches. This is particularly pressing as, year on year, our Priorities for Education report highlights inconsistencies across departments and modules in terms to teaching and assessment delivery. While, of course, there are significant areas of success and innovation, the quality of provision is not equal across the institution. We do, of course, also acknowledge the difficulties of coordinating any approach across such a as large institution but believe the plan would have benefited from more detail in this matter.

This occasional lack of clarity and justification within the plan is likely due, in part, to the page limit set by the OfS and the inherent difficulty in producing a document that is both accessible to students and sufficiently well-justified for the regulator to make its judgments. Finally, given lack the evidence concerning 'what works' within sector, it is challenging for students to come to a reasonable judgment concerning the credibility of these interventions.

- Your university or college's new plan represents a change in their approach?

No change

      ○   Please explain your answer:

We do not believe that UCL's plan represents a change in their approach. Most interventions and initiatives in the plan are existing, expanded, or revised activity, implying little change in the university's approach. Where there is new activity, such as a math's attainment raising activity and the establishment of a UCL alumni school governor network, these have been developed within the framework of existing activity, such as existing attainment raising and school partnership initiatives. Genuinely new activity appears to be found in the development of a new student feedback mechanism for institutional polities and strategies, and a pre-enrolment programme for students enrolled via Access UCL which we are supportive of.

As already discussed, we would have appreciated more evidence as to the progress and success of these initiatives and approaches at an earlier date so that this could have been shared more widely with the student body and their feedback sought. UCL's monitoring, evaluation and impact documents suggest that some of their longstanding approaches have been sufficiently successful to justify their continuation. The five-year review of Access UCL, for example, demonstrates that this initiative has been largely successful in addressing the risks to access identified in the APP while astutely reflecting that an unintended outcome of this scheme may be the disadvantaging the students in IMD/POLAR quintiles 3 and 4. However, the report does not suggest how this might be addressed. We would have appreciated information regarding UCL's wider theory of change, and how this approach and these interventions seek to support it.

- Your university or college's access and participation plan is sufficiently ambitious in addressing the risks?

In some areas, we believe that the plan is not sufficiently ambitious. This is particularly the case for the bursary scheme which offers insufficient support to a narrow range of students. Recent research by Russell Group Students' Union has demonstrated that, as a group, students live below the poverty line, while concerns surrounding the cost of living were a significant theme in our 2024 Student Priorities for Well-Being report. Student cost of living is a prominent theme in the sector. A recent HEPI report sought to establish a minimum income standard for students, meaning a minimum level of income that would allow students an acceptable basic standard of living. It found that students in London living in private rental accommodation would require £21,774 to support a basic acceptable standard of living– leaving a £8,426 annual shortfall between the full maintenance loan, which itself is not received by all students, and the income required for a reasonable standard of living. Without additional support, whether from the university or family, students would need to work nearly 19 hours a week at minimum wage for 18- to 20-year-olds to reach the minimum.

UCL, like most UK universities, recommends that students work no more than 15 hours a week. UCL's bursary scheme offers between £1000 and £3000 to students from households with an annual income of less than £42,875. While this means that students receiving either £3000 or £2000 (those from household with an income under £25,000) would only be required to work c.12-15 hours at minimum wage, those with a family income between £25,000 and £42,875, who do also do not receive the maximum loan upon which the shortfall

is calculated, would be required to work above the limit recommended by UCL. Further, while it might be reasonable to expect parents to contribute to their children's living expenses while at university, UCL's income brackets would leave families who are themselves barely meeting a Minimum Income Standard (calculated as £29,541 for a single working adult, £40,647 for a couple with no children and £46,746 for a couple with two young children) responsible for filling these shortfalls. Finally, UCL's own data suggests that the support offered maybe insufficient: while the plan demonstrates that there is no data to suggest differences in continuation rates for students in receipt of the bursary and not, the fact that 'students who receive a bursary are significantly less likely to achieve a 'good' degree or a first-class degree, when compared to their peers who do not receive a bursary' implies the need to increase investment, rather than simply reinforcing the need for continued investment, to enable students to better engage with their studies. We understand that the bursary scheme is currently under review and look forward to receiving this review in due course.

We believe that UCL could stand to be more ambitious in its approach to mature students. The justification that the access gap for mature students is driven by the full-time provision and that changes to this are not considered feasible is merits further consideration–not all mature students choose to study part-time and not all part-time students are mature. Equating these two, albeit overlapping groups, risks masking their specific challenges. Further, and as mentioned above, an increasing number of full-time, young undergraduates are choosing to commute to university and take on ever-increasing hours to work to support themselves during study. Findings from our Student Priorities for Education report and student networks demonstrate that students, across all groups, find managing their many competing obligations within the traditional full-time undergraduate provision to be a considerable area of concern. A serious reconsideration of the rigid full-time model would benefit all students.

- Your university or college has engaged you effectively in the design of its access and participation plan?

We are mostly satisfied that UCL has tried to engage the student body effectively in the design of its plan. Students' Union UCL's sabbatical officers, especially the Education Officer, have had on-going contact with UCL staff members developing the APP and have been kept updated as to the progress of the plan's development through UCL's committee structure. We are also aware of attempts made by the university of consult the wider student body on the plan.

However, we feel that more could have been done to involve the wider student body earlier in the design of the plan, perhaps through workshops or a greater number of focus groups with students and other stakeholders on potential risks and gaps, and how proposed interventions seek to address these. In particular, it seems that current students who engaged with UCL access activity or entered UCL via a WP route should be engaged in the implementation, evaluation and ongoing revision of the plan.

- You have confidence that your university or college will involve the student body appropriately in the delivery and evaluation of the access and participation plan?

It is not altogether clear how UCL will involve the student body in the delivery and evaluation of its plan. Where the plan references the involvement of the student body in the evaluation of the plan, this is limited to feedback surveys and the publishing of reports arising from these with little indication of how the university intends to act of this feedback. Outside of the existing governance structure, wherein most committees with oversight of the APP have student representation, it is unclear how the student body is involved in the delivery or evaluation of the plan. Additionally, these committee structures lend themselves to a broad overview of the plan and its outcomes, rather than deeper engagement with the logic of the plan on an operational level. It is thus unclear how students would be meaningfully involved in the implementation and evaluation of the plan at the level of specific interventions. We believe that there should be greater emphasis on student involvement at an activity level which is subsequently reported through UCL's governance structures. Further, it is also unclear how UCL's theory of change, the knowledge of which is essentially to the evaluation of the plan, is being communicated to students.

We believe that a closer and clearer relationship between Students' Union UCL and the university, wherein the Union, with adequate resourcing, supports the organisation of the plan's delivery and evaluation, would address these concerns.

How do you think your student body will hold your university or college to account for the delivery of their plan?

We anticipate that Students' Union sabbatical officers and student representation within UCL governance structures, categories that often overlap, are the primary means through which the student body will hold the university to account. Beyond this, the university hosts various panels with student representation including the Changemakers Initiative which supports students and staff who want to work together to enhance the learning experience of students at UCL. However, it is not clear from the plan precisely how the university intends to act on this ongoing feedback.

Do you anticipate any negative outcomes will arise as a result of your university or college's new plan and any change in focus of their planned activities?

The Students' Union anticipates that the focus on continuing activity is insufficient to reducing the gaps highlighted in the plan. Additionally, as previously highlighted, the use of area-based measures risks missing underrepresented and underprivileged young people in London.

Is there anything else the student body would like to add about access and participation at your university or college?

We have two additional areas of concern for the plan. First, we would encourage UCL to reconsider how far some of their proposed activity operates on a deficit model. For example, attainment raising activities do not seem to acknowledge the plethora social, economic, and personal factors that might affect attainment in schools. We recognise that such activities are encouraged by the OfS and would nevertheless welcome more consideration of the diversity

of factors which influence attainment in schools. Additionally, we feel that rather than implementing a pre-enrolment programme for Access UCL students, the principals of universal design could be applied at departmental level to greater effect and benefit for all students.

Finally, given that UCL's own data nearly 60% of students are awarded a first, we query UCL's definition of a good degree as 2:1 or above. Defining a 'good' degree in this way may be obscuring significant attainment gaps.

What do you think worked well, and what suggestions for improvement do you have for the OfS regarding the student submission process, materials and support?

While we are largely satisfied with the OfS' student submission process, we believe that the provision of guidance to the university concerning timelines by which they should provide their student body with their plans and any necessary auxiliary material would be beneficial. We would have appreciated additional OfS guidance determining by when the university should share their plan with their student body to ensure sufficient time for the student body to review the plan and prepare their submission, including the organisation any additional consultations such as focus groups or surveys. Similarly, more guidance from the OfS concerning the supply of evidence, what constitutes 'risk', 'ambition', and 'credibility' in this context, and what expectations the student body should reasonably have in terms of involvement with the design, implementation, and evaluation of the plan would be appreciated as it is currently challenging for the student body to come to reasonable judgements on these matters.

Are you happy to be contacted by the OfS?

Please check the boxes if you are happy for us to get in touch:

☒ To provide further information about this submission, if necessary?

☒ About your experience as a student contact to support improvements to our future guidance and support for students and their university and colleges?

Thank you for your student submission.