

INDEPENDENT HIGHER EDUCATION

IHE response to the UCAS admissions
consultation

April 2026

Introduction

IHE supports the overall direction of UCAS's proposals within this consultation and welcomes the acknowledgement that major structural reform should be undertaken carefully and collaboratively. IHE looks forward to continued engagement with UCAS to ensure that future developments remain equitable, future-facing, and reflective of the full diversity of UK higher education provision.

IHE recognises UCAS's constitutional obligation to balance efficiency for providers with fairness and transparency for applicants and broadly agrees with UCAS's assessment that the current undergraduate admissions cycle functions effectively for many applicants up to the January Equal Consideration Date.

However, IHE believes that several aspects of UCAS's proposals and references to future work require further nuance to ensure they do not create unintended impacts for applicants with non-traditional decision-making journeys, who may not come from school or college, may start at different times of the year or stages of higher education, may be comparing UK and international options, and whose participation is often enabled by the diversity and flexibility of provider models.

IHE considers it essential that any future review of the admissions cycle explicitly examines how contextual admissions affect applicant behaviour, particularly where assessment and interaction occur later in the cycle.

International applicants - particularly those without sponsored pathways or consistent agent support - interact with the UCAS cycle differently, often relying more heavily on system signals and reassurance when determining whether late application remains viable.

IHE notes that much of the admissions cycle remains implicitly calibrated to a single annual intake, which can disadvantage applicants and providers operating multiple or rolling start models. This will become increasingly the case within the Lifelong Learning Entitlement (LLE), and choices now can enable greater flexibility in future pathways. Without early consideration of how modular or credit-based provision might sit within UCAS, there is a risk of significant volumes of applicants accessing learning outside the shared admissions framework, reducing transparency and coherence for learners.

IHE supports innovation within admissions that improves transparency, responsiveness, and alignment with real applicant behaviour. Reforms that enhance visibility and preserve flexibility – such as traffic-light indicators and CI-decline functionality suggested in the proposals – support equitable participation. By contrast, measures that constrain choice or compress decision-making earlier in the cycle risk amplifying existing inequalities in advice, confidence, and system familiarity. Balancing innovation with equity therefore requires prioritising changes that expand informed participation rather than narrowing the conditions under which it is possible.

IHE advocates that any future changes are viewed through the lens of student decision-making and access, looking specifically at how to expand the support UCAS offers to a wider group of applicants. Many applicants – particularly mature learners, international students, first-generation entrants, and those without consistent advice – do not make linear or early decisions, and instead rely on opportunities to explore, interact, and adjust their choices over time. The structure of the admissions cycle therefore plays a critical role in shaping who is able to participate with confidence. IHE recommends that UCAS focus on how choices, insurance routes, deadlines and system signals support or constrain these student journeys, and on the risk that changes calibrated to a narrow, traditional applicant profile could unintentionally exclude growing groups of learners whose needs and behaviours differ from those assumptions.

IHE also urges UCAS to remain cognisant of the importance of considering the cumulative impact of multiple changes over time. Adjustments to choices, insurance, deadlines and Clearing may each appear proportionate in isolation, but in combination risk increasing early-cycle pressure and reducing viable recovery routes for applicants who make decisions later or with less support.

Question 1: The number of choices students can make as part of their main scheme application

IHE agrees with UCAS's recommendation to retain five initial choices in the short to medium term, pending any future reform to Extra and Clearing. UCAS's consultation document notes that students, schools and advisers view a reduction in choices as a cap on opportunity, and that five choices support a breadth of applications including 'safe' and 'stretch' options.

UCAS should also be mindful of a potential unintended consequence acknowledged only indirectly in the consultation: contextual and holistic admissions. Many IHE Members rely on admissions processes beyond grades alone, where contextual consideration is applied through interaction and other factors. Reducing initial choice could limit applicants' access to providers that contextualise proactively, particularly where applicants are not aware of such practices at the point of application or will rely on those contextual processes through design or personal circumstance.

IHE Members' experience strongly reinforces UCAS's own rationale that reducing the number of choices risks disadvantaging applicants that are more likely to rely on later-stage engagement, assessment, or discovery. Independent and specialist institutions see applicants only making decisions after interviews, auditions, assessment centres, or applicant days, rather than purely at the application stage. These opportunities frequently arise through a student's fourth or fifth choice, particularly where brand recognition is lower.

IHE is concerned that reducing the number of initial choices would have consequences beyond application volume, inadvertently weakening discovery for applicants who rely on breadth to explore institutional fit. For students without strong guidance, fourth and fifth choices often function as learning opportunities rather than backups, enabling engagement with providers they had not previously considered. This allows applicants to access information on modes of delivery they may otherwise have not encountered and allows choices to be made outside the traditional three-year courses starting in autumn. It also enables students to give themselves options within one provider – applying to different specialisms in subjects such as game design which have multiple pathways available. Reducing choices will narrow opportunities to explore and discover the choice that is the best fit.

While UCAS highlights that 29% of applicants apply to at least one course they do not intend to accept, IHE notes UCAS's own evidence that applicants increasingly return to their original five choices in Clearing. From an IHE perspective, this reinforces the view that additional choices are not wasted, but form part of a longer exploratory decision-making journey. This is particularly relevant for applicants who are less familiar with the UK system – including international students and those without consistent guidance – where breadth of choice supports discovery, engagement with contextual admissions processes, and informed decision-making over time rather than early certainty.

Question 2: The firm and insurance choice

IHE agrees with UCAS's recommendation to retain the firm and insurance choice. Many applicants supported by IHE Members make decisions only after engaging in contextual or holistic admissions processes such as assessment centres, interviews, auditions, or applicant days. This aligns closely with UCAS's data and modelling, which demonstrate that the insurance choice provides an important psychological safety net and supports confident, aspirational decision-making, particularly for applicants from under-represented backgrounds. Retaining the insurance choice will allow students to remain engaged with longer or less linear admissions processes.

IHE is concerned that changes which weaken the role or perceived reliability of the insurance choice risk narrowing student aspiration earlier in the decision-making process. Evidence from

UCAS modelling and member experience suggests that insurance choices do not simply provide reassurance post-offer but actively enable applicants – particularly those from under-represented backgrounds – to make more ambitious primary choices, including applying to providers or locations they might otherwise rule out.

From an equity and future-readiness perspective, preserving a credible insurance route is also important in supporting applicants with non-standard decision-making journeys, including mature and international students, for whom flexibility and the ability to adjust ambitions over time are critical.

IHE would like to see more information on the interaction between insurance choices and contextual admissions. For some applicants, particularly those from under-represented backgrounds, more ambitious or 'stretch' options may also be those where contextual or holistic admissions processes are most meaningful. Weakening the insurance route risks encouraging applicants to prioritise offers that feel quicker or more certain, potentially reducing their willingness to pursue opportunities where contextual consideration, interviews, auditions, or later-stage assessment could offer genuine flexibility and opportunity. Changes to insurance choices could deter exploration of the mechanisms through which applicants test their fit, receive tailored information, and demonstrate strengths not captured through grades alone.

While UCAS acknowledges that some institutions experience operational challenges in managing insurance numbers, IHE Members consistently report that these challenges are manageable and understood within existing planning assumptions. IHE therefore agrees with UCAS's conclusion that the benefits to students outweigh the operational burden for a small number of providers.

IHE strongly supports UCAS's proposal to introduce 'Decline My Place' functionality for insurance choices (CI-decline). Our members view this as a proportionate efficiency improvement that directly addresses a known friction point identified in the consultation of applicants being placed at insurance choices that they no longer wish to hold. The proposal to introduce optional 'action required' indicators for applicants also received positive feedback, with members noting that such indicators could help reduce avoidable delays - particularly for applicants without adviser support - provided they remain optional, clearly defined, and are used proportionately.

IHE strongly supports UCAS's aims to continue driving efficiencies in the processing of qualifications through the Awarding Body Linkage process. Admissions teams consistently highlighted the operational burden created by gaps or delays in verified qualification data, particularly in relation to GCSE English and maths, Scottish and Irish qualifications, applicants achieving qualifications outside the most recent cycle, and mature or non-standard pathways. IHE Members reported that these gaps often result in repeated manual follow-up with applicants and unnecessary delays in offer-making.

Expanding the coverage, timeliness, and consistency of verified qualification data is seen by our members as a key efficiency gain, with benefits for applicant experience, admissions workflow, and equity. IHE Members view this proposal as well aligned with UCAS's stated objectives and encourage continued prioritisation of Awarding Body Linkage enhancements as part of the wider efficiency programme.

Question 3: The timing of the January Equal Consideration Date and associated dates

IHE is concerned that a growing proportion of learners - particularly mature students and those seeking flexible or modular study - are choosing routes outside of UCAS altogether, not because of dates or deadlines but because the system does not yet reflect how or when they need to make decisions.

This reflects a growing mismatch between the current admissions cycle (predicated on early certainty, a single annual intake, and full-course entry) and the realities of how many learners now approach participation in higher education. Where system signals about openness, timing, and flexibility do not align with these behaviours, applicants may reasonably conclude that UCAS is not designed for them. Over time, there is a risk that this will narrow the population served by UCAS and accelerate the drift of mature and flexible learners into alternative routes which will ultimately restrict choice through reduction in their access to information, advice and guidance (IAG).

IHE broadly agrees with UCAS's proposal to retain a mid-January Equal Consideration Date, falling on the nearest Wednesday to 15 January, and with the associated aim of providing greater long-term stability. IHE Members consistently report that frequent shifts in the Equal Consideration Date create planning and reporting challenges and therefore support UCAS's commitment to publishing dates further in advance.

IHE particularly welcomes UCAS's proposals to introduce greater flexibility around the March Advisory Date, including the exploration of 'offer turnaround time' functionality. Providers operating online, with multiple start dates or with complex admissions processes often cannot align neatly with a single advisory deadline, and transparent communication of realistic timelines would support both applicants and providers.

IHE strongly supports UCAS's proposal to introduce a traffic-light indicator to signal the likelihood of courses remaining open after the January Equal Consideration Date. Our members view this as a low-burden, high-impact intervention that aligns with UCAS's own evidence that the vast majority of courses remain open after this point, while directly addressing persistent applicant misconceptions about missed opportunities.

In particular, IHE welcomes the potential of traffic-light indicators to support applicants who are more likely to apply later in the cycle. UCAS evidence shows that mature and international applicants, as well as those without consistent school or adviser support, are more prone to applying after January or to misunderstanding the Equal Consideration Date as a hard cut-off. For these groups, visibility and reassurance are critical.

Traffic-light indicators provide a proportionate mechanism to counter false assumptions about course closure, demonstrate that later applications are genuinely viable, and support confident participation later in the cycle. IHE Members regard this proposal as especially valuable in widening participation and in better reflecting the realities of non-traditional and non-capped recruitment models.

IHE shares UCAS's caution regarding any expansion of the October early application deadline and considers this a significant risk to equal access. Evidence cited in the consultation from schools, colleges, regulators, and UCAS's own research is consistent with IHE Members'

experience: earlier deadlines disproportionately disadvantage applicants without strong advice, confidence, or system familiarity.

IHE notes a broader risk that reforms intended to alleviate operational pressure for a subset of providers may unintentionally transfer complexity and risk onto applicants, particularly those with limited guidance. Measures that constrain applicant behaviour rather than improving system transparency or flexibility risk entrenching, rather than resolving, inequity.

In contrast to proposals such as the traffic-light indicator which improve visibility and support later participation, an expanded October deadline would operate in the opposite direction. This risks front-loading advantage to the most supported applicants while increasing the likelihood of missed opportunities for mature students, international applicants, and those without consistent guidance. IHE is therefore clear that any move to extend the early deadline would amplify existing inequalities in the admissions system and should only ever be considered in exceptional, tightly constrained circumstances.

Additional areas of feedback

How often do you think UCAS should review the findings of this consultation and engage with the sector regarding dates, deadlines, and the number of choices students can make?

Every three years.

Feedback from the pre-consultation engagement has highlighted that there is a need for increased efficiencies across all universities and colleges. Would you, or a member of your institution, wish to engage with UCAS further regarding our efficiencies work?

Yes.

In addition to the areas explored above, are there other areas of the undergraduate admissions cycle where UCAS could make enhancements?

IHE welcomes UCAS's commitment to convening a Sector Efficiencies Working Group and to exploring an enhanced Clearing process in future phases of work. IHE cautions against over-reliance on Clearing reform to absorb structural rigidity earlier in the admissions cycle, particularly where this would disadvantage applicants who rely on sustained engagement and holistic assessment. IHE would also encourage UCAS to ensure that any such group is representative of the sector, with the meaningful involvement of representative bodies, so that efficiencies work reflects a wide range of provider models and student experiences.

IHE considers it important that any future review of the admissions cycle explicitly examines how contextual admissions function in practice across provider types, rather than treating contextual consideration as a marginal or purely grade-based adjustment.

IHE considers it important that future reforms are informed by a clearer understanding of who UCAS is not currently reaching, as well as those who already apply through the system. The

population of 18-year-olds who have traditionally formed the core UCAS applicant base is projected to decline, while participation by mature learners and those seeking flexible or modular study is expected to grow, particularly in the context of the forthcoming Lifelong Learning Entitlement (LLE). At present, there is limited reflection within the consultation on the needs, behaviours, and decision-making journeys of these learners, or on why some are choosing to pursue routes outside UCAS altogether.

IHE is concerned that focusing primarily on dates, deadlines and choices risks overlooking more fundamental barriers for these groups, including how information is presented, when decision-making occurs, and whether the system visibly accommodates non-linear pathways such as later entry, part-time study, or modular provision.

Where learners choose direct entry routes, they may have access only to institution-specific information, limiting their ability to compare options or understand the breadth of provision available to them. IHE therefore encourages UCAS to engage more explicitly with students who are not currently applying through UCAS, and with providers that predominantly serve them, to inform future system design and ensure that all learners are supported to make well-informed choices at the point in their journey when those decisions are most meaningful.

Alongside structural considerations, IHE Members raised concerns aligned with UCAS's efficiency theme, including system usability, fragmented reporting, gaps in verified qualifications data for mature and international applicants, and misalignment between UCAS and HESA data structures.

In particular, our members recommend:

- The value of UCAS providing standardised reporting on how long applications take to move from application to offer. This would help with:
 - using objective data to challenge internal delays, particularly with academic departments
 - supporting more consistent offer making
 - reducing the need to manually construct this data outside UCAS.
- Improvements to the user interface and simpler, more navigable reports. Currently members have concerns over:
 - fragmented menu functionality
 - difficulty obtaining an overview of application progress
 - time spent navigating reports that don't meet operational needs.
- Calculations of tariff. This remains highly manual for providers and IHE Members feel that UCAS holds all the necessary information to automatically calculate tariff points of applicants in the system.
- Better system integration between UCAS, provider systems and HESA to tackle inefficiencies caused by:
 - misalignment between UCAS and HESA definitions and values
 - weak or partial integration with student record systems
 - duplication of data entry across systems.

Is there any other feedback you wish to share with UCAS?

IHE and our members welcome the opportunity for continued dialogue with UCAS as future reforms are considered. In particular, we would value sustained engagement on how admissions structures and processes affect student groups that are well represented within IHE's membership, including mature and international students, whose application behaviours, decision timelines, and support needs may differ from those of traditional school-leaver cohorts. Ongoing engagement which considers these perspectives will be important in ensuring that future reforms remain equitable, inclusive, and responsive to the evolving shape of higher education participation.

Contact IHE

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