

UCAS Admissions Process Review

million+ Submission

million+ is a university think-tank which provides evidence and analysis on policy and funding regimes that impact on universities, students and the services that universities and other higher education institutions provide for business, the NHS, education and the not-for-profit sectors.

Application post-results: proposed system

To what extent do you agree/disagree with the following statements?

(APR Consultation ref 23.6.1)

A system of application post-results would deliver a fairer admissions process because the applicant would submit actual results and the reliance on predicted grades would be removed

1- strongly agree 2- agree 3- disagree 4- strongly disagree	Enter number between 1 – 4 below: 3 <i>Although in principle an APR system would appear to be fairer, the proposals tabled by UCAS do not deliver equality of opportunity for all applicants and primarily focus on those with A-level pre-entry qualifications. For this reason million+ does not agree that the UCAS Process Review proposals that have been tabled would deliver a fairer admissions system.</i>
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(APR Consultation ref 23.6.2)

Applying post-results will not necessarily have positive impacts on equality and diversity.

1- strongly agree 2- agree 3- disagree 4- strongly disagree	Enter number between 1 – 4 below: 1 <i>Million+ strongly agree that the proposals tabled will <u>not</u> necessarily deliver positive impacts on equality and diversity (reasons outlined below).</i>
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(APR Consultation ref 23.6.3)

Two choices is an adequate number for Apply 2, allowing applicants both an aspirational and a more realistic application.

1- strongly agree 2- agree 3- disagree 4- strongly disagree	Enter number between 1 – 4 below: 4 <i>Million+ does not consider that it is helpful for UCAS to refer to 'aspirational' and 'more realistic' applications and we disagree that applicants should be limited to 2 choices. Aspirational applications and offers can motivate some prospective students to work towards higher pre-entry grades / qualifications. Moreover, when the technology exists to remove the need for the circulation of hard-copy printed applications there</i>
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is no reason to reduce the number of choices that an applicant can make.

(APR Consultation ref 23.6.4)

A system of application post-results may encourage a mechanistic approach to admissions with contextual and other data used less effectively.

- 1- strongly agree
- 2- agree
- 3- disagree
- 4- strongly disagree

Enter number between 1 – 4 below:

2

It is by no means certain that an APR system would encourage a more mechanistic approach to admissions. However, the proposals pay insufficient regard to the benefits for applicants of universities being able to use contextual data in admissions. They also appear to be based on a model linked with younger full-time applications. As such they pay little regard to the implications for students with other pre-entry qualifications or those who enter university via access courses or in circumstances in which universities take into account APEL and work-acquired qualifications or competencies. Under an APR system universities will not necessarily advertise their entry grades thresholds but may publish a grade that will maximise applications and acceptances. There is also a risk that applicants could use the advertised grade tariff as a hard and fast requirement and not be aware that a university make take other factors such as contextual data into account.

(APR Consultation ref 23.6.5)

The lack of flexibility in the proposed post-results system may mean that HEIs are forced to reject candidates they might have accepted in the current system.

- 1- strongly agree
- 2- agree
- 3- disagree
- 4- strongly disagree

Enter number between 1 – 4 below:

2

Million+ agree that in principle this could be an outcome for some students although it is not clear why universities would be 'forced' into rejecting some applicant on the basis of 'lack of flexibility'. However the introduction of an undifferentiated 2 choice system risks creating inflexibility and causing greater difficulties in planning numbers and could, for example, lead to a larger number of courses being withdrawn due to unviable numbers at the end of Apply 2. This would act to the disadvantage of rather than benefit applicants

(APR Consultation ref 23.6.6)

Giving young applicants more time to make application decisions recognises how much they mature over the final year at school or college.

- 1- strongly agree
- 2- agree
- 3- disagree
- 4- strongly disagree

Enter number between 1 – 4 below:

3

Although there may be anecdotal evidence, there is no clear research base to support this proposition. There is some flexibility in the current system which is helpful to applicants and universities. However, many younger students from widening participation backgrounds benefit from

developing relationships with universities over a period of time which are based on early offers.

(APR Consultation ref 23.6.7)

A post-results system will not be agile enough to provide a better experience for all groups of students; those with A levels, those with Scottish Highers and those with other academic or vocational qualifications.

- 1- strongly agree
- 2- agree
- 3- disagree
- 4- strongly disagree

Enter number between 1 – 4 below:

2

An APR system might deliver a better experience for all groups of students but million+ agree that the proposals tabled in the UCAS Process review do not deliver this because they are predominantly based on younger full-time students studying A-levels.

(APR Consultation ref 23.6.8) Please specify any particular group of students whose needs would be less well met in a post-results system

In general terms, widening participation students' needs may be less well-met for the following reasons:

- the compressed time period available for students to research effectively
- the quality and extent of the IAG likely to be available in schools and colleges in the summer period
- the potential to limit where applicants might visit particularly in view of the fact that by moving the timeframes, school / college applicants would also be involved in earlier examinations

Moreover

- A high / aspirational offer made early in the process can encourage widening participation candidates to improve / work towards higher grades.
- There is a real concern that the timetable pays little regard to the needs of disabled students.
- The needs of students with vocational pre-entry qualifications and / or applying to university via access courses are not properly considered.
- In general terms those with non-A-level pre-entry qualifications are often older – or in the alternative gained A-level grades some time / years prior to their applications; bearing in mind that one in four students enter university when they are over 21, it is difficult to see how these proposals have the flexibility to cater for older / mature applicants and students
- The proposed amendments to the timetable / university year do not meet the needs of students and courses which include clinical or professional placements e.g. teaching, allied health professions.
- The proposals minimise the challenges of planning to study away from home for students who have less access to financial support and who are less mobile / well-travelled.

Please enter any further comments about this section below

Million+ welcomes the consideration that has been given as to how an APR / PQA system might be introduced and has previously taken the view that, in principle, a move to APR / PQA would be highly desirable. However, any APR / PQA system needs to be built on equality of opportunity for all students

and should deliver fairness regardless of the different pre-entry qualifications by which students progress to participate in higher education . The proposals which have been tabled in the Process Review are dominated by A-level as a pre-entry requirement and do not reflect or meet the requirements for an APR system that caters for the full range of students. As such the APR proposals do not provide equality of opportunity for all applicants or the flexibility to meet their needs and in their current form are therefore not supported by million+.

There is no justification to limit applicant and student choice to two – particularly bearing in mind the Government’s decision to incentivise the student numbers market in England. A reduction in applicant choice is also likely to have unintended consequences in terms of institutional decisions about the viability of courses. This may, in turn, limit rather than enhance applicant choice.

Application post-results: widening participation

To what extent do you agree/disagree with the following statements?

(APR Consultation ref 24.8.1)

A wider group of applicants would be encouraged to make more aspirational applications with the confidence of knowing they have achieved appropriate qualification results.

- 1- strongly agree
- 2- agree
- 3- disagree
- 4- strongly disagree

Enter number between 1 – 4 below:

3

There is no firm evidence to indicate that this would be the outcome of the APR system proposed. There is some flexibility in the current system but in any case many widening participation students benefit from long-term relationship building with an institution. It is not necessarily certain that a wider group of applicants would make more ‘aspirational’ applications (see previous comments). Moreover, regardless of results, the choices of some students are limited by care and/ or work responsibilities, the desire and need to live at home and by the course choice that they have made.

(APR Consultation ref 24.8.2)

Applicants would be deterred from making aspirational applications by having to make decisions quickly and being restricted to two choices.

- 1- strongly agree
- 2- agree
- 3- disagree
- 4- strongly disagree

Enter number between 1 – 4 below:

2

Million+ agree that this could be an outcome of both the shorter time-period for decision-making and the restriction to two choices.

(APR Consultation ref 24.8.3)

Applicants may not understand the importance of contextual data and would be deterred from applying for some courses if they have not achieved the grades.

1- strongly agree 2- agree 3- disagree 4- strongly disagree	Enter number between 1 – 4 below: 2 <i>Million+ agree that applicants would have to understand the role of contextual data in admission. There would be challenges in explaining this and ensuring that applicants and their families understood that admissions was not a process simply determined by A-level grade. However, to some extent these challenges exist in the current system.</i>
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(APR Consultation ref 24.8.4) Widening participation would be supported by more constructive and focussed advice and guidance.	
1- strongly agree 2- agree 3- disagree 4- strongly disagree	Enter number between 1 – 4 below: 4 <i>Applicants of all ages should be supported by IAG. However million+ strongly disagree that there should be an expanded role for UCAS in IAG or that widening participation would be supported by more focussed guidance. We are opposed to the suggestion that the UCAS admissions system should include a flag system or any assessment of the merits of applicants' choices.</i>

APR Consultation ref 24.8.5) How do you think a system of application post results could be managed to enable it to promote widening participation?	
<p>An APR system would have to be flexible and deliver equal opportunities for all prospective students. The current proposals are A-level dependent and as such remain biased towards younger full-time student rather than the diversity of the student profile. While APR might prove challenging for universities to deliver e.g. in terms of, for example, processing of admissions, accommodation and finalising student numbers, these should not be impediments in themselves. However, the APR system needs to be a very different one from that proposed and any future proposals should actually be 'tested' with different groups of WP students including those who may be less likely to have the same cultural, financial or family capital to manage a more truncated process and / or who have family or work commitments to take into account.</p>	

Please enter any further comments about this section below	
<p>The consultation appears to be overly-concerned with students making 'aspirational applications' but nothing like as concerned with the pre-entry qualifications and APEL often associated with widening participation students. Some statements appear to confuse A-level pre-entry requirements with the quality of courses e.g. the reference in para 12.8 to 'a significant proportion of applicants who are discouraged from applying to more demanding courses for which they might eventually be qualified' . This presumably refers to A-level entry grade requirements – although this is not what it says.</p>	

Application post-results: Efficiency improvements
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To what extent do you agree/disagree with the following statements?

(APR Consultation ref 25.18.1)	
A post-results system is an efficient system as fewer applications require processing by HEIs.	
1- strongly agree 2- agree 3- disagree 4- strongly disagree	Enter number between 1 – 4 below: 3 <i>Million+ does not agree that the proposed APR system would necessarily deliver a more efficient system. In fact there are concerns that it would extend admissions, marketing and open day requirements. These are not necessarily reasons to oppose an APR system per se but the suggestion that efficiency should be judged simply on the number of applications processed is highly questionable. The whole APR system would have to be assessed against the current system and subject to a quantifiable like-for-like comparison.</i>

(APR Consultation ref 25.18.2)	
A more efficient streamlined process would enable HEIs to make financial savings.	
1- strongly agree 2- agree 3- disagree 4- strongly disagree	Enter number between 1 – 4 below: 3 <i>Million+ agree that in principle a more streamlined process might enable universities to make financial savings. However, it is not clear that the APR proposals would produce a more stream-lined system or any significant savings in universities. Indeed, there are concerns that the proposals might prove more costly. However, there is no quantifiable or comparative analysis to substantiate the proposition that long-terms savings could or would be achieved by universities.</i>

(APR Consultation ref 25.18.3)	
A more streamlined process would make the process easier for applicants to navigate.	
1- strongly agree 2- agree 3- disagree 4- strongly disagree	Enter number between 1 – 4 below: <i>No score (The question assumes that the APR proposals will deliver a more streamlined process)</i> <i>Million+ supports improvements in the admissions process that might make the latter easier and more straightforward for applicants. However, it is not clear that a more steam-lined and easier process for applicants will result from these APR proposals.</i> <i>For example, even under the current A-level timetable, school / college applicants have frequently left their institutions of study in May. Under the APR proposals this is likely to be brought forward. Without a guarantee that IAG would be available to cope with the number of applicants involved in making decisions over a short time-period, million+ is very concerned that the process might not prove to be easier for all applicants.</i>

There are a significant number of applicants for whom interviews, auditions and the presentation of portfolios are a pre-requisite of course acceptance. In some cases these interviews are a requirement of the relevant professional body and /or may be conducted in partnership with other organisations (e.g. initial teacher training interviews may be conducted in partnership with schools). It is very difficult to see how these requirements could be met post results and it is likely that HEIs would have to run shadow systems and interview candidates outside of the time-frame.

In the first instance million+ consider that there would be considerable merits in UCAS improving its technology platforms / reviewing the admissions 'language' to improve the current processes to create a more accessible system for applicants.

(APR Reference 25.18.4) What disadvantages in terms of process efficiency, if any, could be experienced by HEIs, applicants or advisers as a result of a post-results system?

Under an APR system universities would have later knowledge of student numbers, associated funding streams and accommodation requirements than at present. This would have wide-ranging implications for business, course and resource planning in institutions with a 'peak loading' period. It is also worth noting that some university offers are linked with an accommodation promise which may be important for some students.

The implications for process efficiency require careful assessment and the impact of the interventions by the Westminster Government (and potentially the Welsh Assembly) in respect of student number controls and the move to funding following the student via the student loan system in England should also be taken into account.

Million+ have previously argued that the impact of the 2012 funding system and the interventions in the student numbers market in England should be assessed over two admissions cycles. We would therefore recommend that UCAS review the impact of these measures on demand, the profile of applicants and actual enrolments and on applicant and institutional behaviour - and thereafter review the merits in terms of process efficiency of introducing any form of APR system.

Please enter any further comments about this section below

For any APR-type system to be successful, million+ believe that UCAS would have to have developed a proven capacity to deal with a large volume of applicants. As yet this capacity has not been demonstrated.

Application post-results: International and part-time students

To what extent do you agree/disagree with the following statements?

(APR Consultation ref 26.5.1) It is desirable for international applicants to apply through a centralised system and not direct to HEIs.	
1- strongly agree 2- agree 3- disagree 4- strongly disagree	Enter number between 1 – 4 below: 3 <i>Million+ can see no obvious advantages to international students in applying through a centralised system. Trans-national partnerships are often institution- specific and international students develop strong relationships with institutions of choice</i>

(APR Consultation ref 26.5.2) It is desirable for part-time applicants to apply through a centralised system and not direct to HEIs.	
1- strongly agree 2- agree 3- disagree 4- strongly disagree	Enter number between 1 – 4 below: 4 <i>Million+ can see no advantages to part-time students being required to apply via a centralised UCAS system and would be strongly opposed to this. Part-time students have different patterns of recruitment – often highly related to care and work commitments and location / accessibility of course provision. There is no proven case for UCAS to expand into managing admissions of part-time students unless requested to do by an individual institution i.e. if an individual institution wishes to buy into the UCAS services for part-time applicants that should be a matter for the institution and UCAS.</i>

(APR Consultation ref 26.5.3) Access to improved data about international and part-time applications will be a benefit of being part of a central admissions service.	
1- strongly agree 2- agree 3- disagree 4- strongly disagree	Enter number between 1 – 4 below: 4 <i>Data re international and part-time applications can be collected in other ways and there are no obvious benefits to <u>applicants / students</u> of this data being collected via UCAS admissions service.</i>

(APR Consultation ref 26.5.4) The proposed new process has the capacity to offer greater flexibilities which will support international and part-time admissions.	
1- strongly agree 2- agree 3- disagree 4- strongly disagree	Enter number between 1 – 4 below: 4 <i>Million+ is opposed to the APR proposals that have been tabled precisely because they fail to offer a flexible system for all UK-EU students. It is therefore difficult to understand why and how application to university via UCAS would provide international and / or part-time applicants with greater 'flexibilities'.</i>

Please enter any further comments about this section below
Million+ can see no particular benefits for either international or part-time students to be recruited via

UCAS – indeed in many cases a UCAS application would be superfluous and would simply complicate the admissions process for applicants and institutions. There is nothing in the patterns of recruitment associated with either international or part-time students to suggest that a requirement that these students use the UCAS admissions systems would have any merit or provide any clear benefits to universities or applicants.

Application post-results: Examination, results and applications timetable

To what extent do you agree/disagree with the following statements?

(APR Consultation ref 28.7.1)

The changes to the examination timetable should not have a major impact on the accuracy of assessment; with appropriate changes to their systems, awarding bodies should be able to maintain accuracy and rigour in a shorter marking period.

- 1- strongly agree
- 2- agree
- 3- disagree
- 4- strongly disagree

Enter number between 1 – 4 below:

3

Million+ is not an awarding body. However, we are not convinced that the proposed changes to the examination timetable will make it easier for awarding bodies to deliver the rigour required within the shorter marking period. It is also worth noting that even under the current examination timetable, the number of appeals against A-level grades has been rising. For confidence in the system to be maintained, this proposition would have to be subject to careful assessment.

For the sake of completeness, million+ would also point out again that primarily UCAS seems to have been concerned with the A-level system and that there are other pre-entry qualifications with associated timetables that should also be considered.

(APR Consultation ref 28.7.2)

The option of starting the HE term for first year students in late October is worthy of consideration.

- 1- strongly agree
- 2- agree
- 3- disagree
- 4- strongly disagree

Enter number between 1 – 4 below:

4

Million+ is opposed to the late October start date. A number of modern universities start their terms much earlier. In any case a late October start date will not accommodate the needs of NHS, education-related and other employer-focused courses and students. Once an induction week is taken into account, this proposal would effectively reduce the teaching term to 7 weeks. Notwithstanding any impact on the time available for teaching, we consider that the shorter term is likely to impact adversely on participation and retention rates especially among students who need longer to settle into patterns of study.

This proposal would also impact adversely on postgraduate provision since it would be impractical to commence UG and PG provision at different

times and on international students.

(APR Consultation ref 28.7.3)

The option of starting the HE term for first year students in January is worthy of consideration.

1- strongly agree
2- agree
3- disagree
4- strongly disagree

Enter number between 1 – 4 below:

4

Million+ is opposed to the start of the HE term for first year students being delayed until January and considers that this is likely to undermine rather than enhance widening participation. It also has implications in terms of fees and student loan arrangements .

Moreover, many modern universities offer start dates for some courses on more than one semester. Any proposal which restricts the potential for universities to offer and commence t courses on a flexible basis according to the needs of students and / or employers with whom universities work, risks creating more rigidity rather than the greater flexibility that is required to meet the diverse profile of students who progress to and participate in higher education as well as the needs of employers.

(APR Consultation ref 28.7.4)

The resources available in schools and colleges will be sufficient to give students support to make applications and manage offers in the timescale proposed.

1- strongly agree
2- agree
3- disagree
4- strongly disagree

Enter number between 1 – 4 below:

3

Million+ is concerned that not all schools and colleges would be in a position to deliver the support that students need within the timescales but in any case there can be no presumption that the work and support of schools and colleges would be restricted to this period. The APR proposals may extend the demands on schools and colleges for support and IAG (including during other pressure points in the school year) and this needs to be subject to more careful assessment.

(APR Reference 28.7.5) What provisions could be made within the educational and qualification structures in Scotland to make a UK system of application post-results workable for Scottish students?

Million+ considers that the UCAS system needs to be fit for purpose for full-time students for the whole of the UK (assuming that Scotland and Northern Ireland continue to wish to be part of a UK-wide system). We are not convinced that the current APR proposals deliver a system that is fit-for-purpose on a UK-wide basis for all students.

(APR Reference 28.7.6) What steps could be taken to secure parity for Northern Irish applicants whose school term currently ends at the end of June?

See above

Application post-results: Proposed timetable changes

To what extent do you agree/disagree with the following statements?

(APR Consultation ref 29.4.1)
An earliest start date of circa 8 October for first year students would not have a serious impact on the delivery of HE courses.

<p>1- strongly agree 2- agree 3- disagree 4- strongly disagree</p>	<p>Enter number between 1 – 4 below: 4 <i>Million+ notes that this proposal is only a marginal improvement on that tabled at 28.7.2. In this case 9 effective teaching weeks would be available prior to Christmas against the 11 that many modern universities offer but in any case the same 'in principle' objections apply.</i></p> <p><i>Any proposal which restricts the potential for universities to offer and start courses on a flexible basis according to the needs of their students and / or the employers and professional bodies with whom they work risks creating more rigidity rather than the greater flexibility that is required to meet the diverse profile of students who progress to and participate in higher education. Many modern universities commence their terms earlier than 8 October and this proposal would reduce the time for teaching.</i></p>
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(APR Consultation ref 29.4.2)
Universities could make appropriate resources available to make offer decisions and process applications between mid-July and end August.

<p>1- strongly agree 2- agree 3- disagree 4- strongly disagree</p>	<p>Enter number between 1 – 4 below: 2 <i>Million+ believes that making the <u>appropriate</u> resources available would be challenging. However, we would expect universities to do everything possible to provide resources to ensure that any new APR system worked. This is not just about providing administrative resources but also expertise and it should be acknowledged that university staff will inevitably also have their own family commitments including in relation to school holiday periods . If interviews also had to take place between mid- July and end of August , this would create further serious challenges (see below)</i></p>
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(APR Consultation ref 29.4.3) Please give any suggestions about what needs to be done to ensure that interviews can be successfully completed within the proposed model of applications post-results.

Million+ considers that it is highly unlikely that all interviews could take place over the July-August period but in any case this assumes that only universities are involved in interviewing candidates. Interviews are not just a means by which universities add to their knowledge / make decisions about the merits or otherwise of different applicants. On a significant number of courses, interviews are a professional body requirement e.g. health, social work, education. Some of these interviews e.g. education / ITT are conducted in partnership with other organisations. It is difficult to see how this could be achieved within the July-August period.

Interviews and in-principle decisions would have to be made prior to the APR period so that applicants who were not accepted on to professionally focused courses had the opportunity to consider other

options.

(APR Consultation ref 29.4.4) Please give any suggestions how to accommodate applications for courses requiring auditions or the submissions of portfolios.

Similar timing problems arise in respect of performing arts and other courses that require students to present portfolios or audition. These applicants are also likely to have to be dealt with prior to the APR period. Again this might require in-principle decisions about their applications to be made by individual universities. It is likely that a shadow system of interviews / decisions would be required and operated in advance of the APR period for a significant number of applicants.

Please enter any further comments about this section below

Million+ considers that the implications of an APR period in July-August should be subject to greater scrutiny and survey work including among prospective students and their families. The latter are often heavily involved in students' choices and decisions. While APR seems highly desirable in principle, it is not clear that the wider implications and impact of moving to an APR system are well-understood. Any further APR proposals that are developed in the future should be subject to much greater research among prospective students and a more robust evidence base than is currently available .

Application post-results: Benefits and risks of the proposed 2014 year of entry enhancements

To what extent do you agree/disagree with the following statements?

(APR Consultation ref 31.3.1)

A single offer date for all applications would help minimise the real or perceived advantages of applying as early as possible in the cycle.

- 1- strongly agree
- 2- agree
- 3- disagree
- 4- strongly disagree

Enter number between 1 – 4 below:

3

Million+ considers that the merits of a single offer date should be subject to further discussion including the practicalities of implementation. There are implications for widening participation students and students who benefit from relationship building with universities. These students are often encouraged to maintain their interest in progressing to university by an early offer which may also be 'motivational' in terms of school and college work and attainment.

We are not convinced that a single offer date would discourage early applications from some candidates or that universities for different reasons would not consider those applications in advance of a single and later offer date.

(APR Consultation ref 31.3.2)

The current process can be improved with a more disciplined approach to deadlines, service level

agreements for decision-making by HEIs, with no informal agreements to relax them.	
1- strongly agree 2- agree 3- disagree 4- strongly disagree	Enter number between 1 – 4 below: <i>No score - there is no clear explanation to outline what this statement / question might mean in practice.</i> <i>Million+ believes that UCAS should concentrate on working with HEIs to improve the current system and considers that more detailed work needs to be undertaken to consider how this can be achieved for 2014. As part of this on-going work it would be particularly helpful if UCAS could outline what is meant by a more 'disciplined approach to deadlines, SLAs for decision-making by HEIs' and to explain what is meant by 'no informal agreements to relax them'. In particular UCAS should set out what is envisaged, how it might be achieved and how any proposals would be implemented and 'policed'.</i>

(APR Consultation ref 31.3.3) The replacement of Clearing with a managed process of applications with equal consideration for places available at that point would give students a more positive experience and achieve a better match of applicants to courses.	
1- strongly agree 2- agree 3- disagree 4- strongly disagree	Enter number between 1 – 4 below: 3 <i>Million+ agrees that this might be helpful to applicants but there needs to be further discussion as to how this might work in practice particularly bearing in mind student number controls. In reality any managed process may create risk for applicants by forcing applicants who under the current system may have more than one option, into a single choice.</i>

(APR Consultation ref 31.3.4) A short break between Confirmation and Apply 3 would help to improve the process to place applicants after they have received their results.	
1- strongly agree 2- agree 3- disagree 4- strongly disagree	Enter number between 1 – 4 below: 3 <i>Million+ agrees that a short break between confirmation and Apply might in principle be helpful to applicants. However, it is likely that many applicants would be motivated to contact universities and the latter would be incentivised to deal with such enquiries particularly bearing in mind the complexities of managing student number controls. While we agree that this may merit further discussion, the reality is that it may be difficult to operate in practice.</i>

Please enter any further comments about this section below	
The single offer date may seem desirable but there are advantages in universities being able to make an early offer to prospective widening participation students. UCAS would also have to have developed a proven capacity by 2014 to deal with a single offer date.	

Proposals to apply dates firmly are not necessarily compatible with a flexible system and in some instances it is difficult to see how they would be policed and maintained in practice.

The renaming of clearing may be desirable but will not avoid the latter being a high 'pinch' point in the system.

There are considerable merits in improving the current system and UCAS should focus on this and consider any improvements in the light of the potential and actual impact of the 2012 changes in England.

The insurance choice

Option	Description	Benefits	Disadvantages
Keep insurance choice as is	A contractually-binding 2 nd choice, intended to offer a safety net to applicants not meeting the conditions of their firm choice	Supports applicants in making aspirational choices	Evidence shows that it is not well understood by applicants and is not used wisely
Remove insurance choice	Applicants accept one conditional offer and enter Clearing if they don't meet the conditions	Facilitates HEIs in managing their numbers	Does not support applicants in making aspirational choices; disadvantages recruiting institutions for whom the insurance choice may represent an important pool of applicants
Enforce correct use of insurance choice	Application system ensures that applicant has included at least one choice with lower entry requirements	Supports applicants in using the insurance choice as it was intended; fewer applicants needing to enter Clearing	Simple business rules don't reflect complexity of offers and what appears to be an unwise insurance choice may in reality not be, for instance for courses like medicine where the option for entry with lower grades does not exist.
Make insurance choice optional for HEIs	HEIs choose whether applicants can accept them as an insurance choice or only as a firm choice	HEIs for whom insurance choice is beneficial can continue with it; applicants can choose to apply to HEIs that accept insurance choice	More complex than current process and has capacity for unfairness
Replace insurance choice with priority wait	Applicant chooses one firm choice and can be	Provides some back-up for applicant but not	Provides less certainty for applicants than current

list option	added to wait list for up to four others. HEI gives priority to waitlisted applicants once CFs have been confirmed	contractually binding on HEI so facilitates number management	process. Is complex and would be difficult to implement
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(APR Consultation ref 32.5)

In light of the information given above, please rank the options above in your preferred order (using 1 as the most effective through to 5 as the least effective).

Option	Rank 1 to 5
Keep insurance choice as is	1
Remove insurance choice	5=
Enforce correct use of insurance choice	5=
Make insurance choice optional for HEIs	5=
Replace insurance choice with priority wait list option	2=

Please enter any further comments about this section below

There have been difficulties with the insurance offer in recent years primarily arising from demand outstripping the supply of student numbers and the overall student number controls placed on the latter. Million+ considers that the retention or otherwise of the insurance offer would benefit from an evaluation of the 2012 reforms but it is important to recognise that the insurance offer has been important to ensure that widening participation applicants are enabled to make aspirational choices and there should be no early decision to remove it. There would also be merits in assessing the outcome of the new fees / funding system in England and the interventions in student numbers over two admissions cycles although we recognise that this would potentially delay any reform of the insurance offer until after 2014.

Although we have suggested that a priority wait list option might be considered in the future, we are unclear how this would benefit applicants since without any guarantee it would effectively be meaningless. Making the insurance choice optional for HEIs is also likely to have perverse consequences and could be open to abuse – and could for example be used to manage institutional reputation rather than as part of an improved admission process.

Million+ considers that it would be highly undesirable for UCAS to enforce the ‘correct’ use of the insurance choice in a system that should be designed to meet the needs of students i.e. if students wish to use the insurance choice in a particular way the UCAS system should not prevent them from doing so. Similarly UCAS should not seek to provide advice re ‘aspirational applications’ via a flag system.

Timetable for reform

To what extent do you agree/disagree with the following statements?

(APR Consultation ref 33.2.1)

2016 year of entry is a manageable start date for a system of applications post-results.

- 1- strongly agree
- 2- agree
- 3- disagree
- 4- strongly disagree

Enter number between 1 – 4 below:

4

Million+ does not agree that the APR proposals in their current form are fit for purpose. Accordingly they should not be introduced in 2016 and should be re-considered following an evaluation of any improvements in process that may be achieved in 2014 and an evaluation of the impact of the current and any subsequent reforms to fees / funding and student number controls.

(APR Consultation ref 33.2.2)

2014 year of entry is a manageable date to be ready for the proposed changes to the current system.

- 1- strongly agree
- 2- agree
- 3- disagree
- 4- strongly disagree

Enter number between 1 – 4 below:

3

In principle million+ agrees that improvements should be possible by 2014. However the detail and practicalities of the 2014 proposals require further consideration and it may not be possible or desirable to introduce all proposed changes by 2014.

(APR Consultation ref 33.2.3)

We believe that the proposed changes for 2016 year of entry and 2014 year of entry are workable solutions.

- 1- strongly agree
- 2- agree
- 3- disagree
- 4- strongly disagree

Enter number between 1 – 4 below:

4

For the reasons outlined above, million+ does not agree that the proposals tabled are workable solutions.

(APR Consultation ref 33.2.4)

If the proposal for 2016 year of entry does not go ahead, further refinements are needed to the 2014 process.

- 1- strongly agree
- 2- agree
- 3- disagree
- 4- strongly disagree

Enter number between 1 – 4 below:

2

As they stand the 2014 proposals are under-developed and should be subject to further consideration. If the 2016 proposals are deferred, it is not clear why further refinements would be needed for 2014. The primary aim (for 2014 and in subsequent years) should be to ensure that the current UCAS system is easier to navigate for applicants and that the UCAS technology platforms can manage the volume of processing required at pinch points in the admissions cycle.

Please enter any further comments about this section below

The 2016 proposals should be rethought but whatever the challenges and opportunities of an APR system, the 2016 proposals (or any further proposals related to APR) should be deferred in terms of implementation date and considered in the light of a full assessment of the impact on student and institutional behaviour of the changes in fees / student numbers in England post 2012 (bearing in mind the potential for further intervention in respect of the latter). Any future APR proposals should take into account the impact of any amendments to the UCAS system which might be agreed for implementation in 2014 or in subsequent years, should be based on a system that is fit for purpose for the diversity of the full-time student population in terms of entry qualifications and profile and be informed by a full equality impact assessment. There would also be merits in UCAS improving the evidence and research base including by testing the views of prospective applicants in respect of the practicalities of any proposed major APR changes. Currently the evidence base is weak and verges on the anecdotal.

Significant improvements to the system could be achieved if the UCAS technology platform associated with the current system was updated / fit for purpose and provided a flexible system for students. There are also potential benefits for applicants in changing the language associated with the admissions system. These improvements should be the major priority and UCAS should not be tempted to stray into areas of marketing and 'shared services' that are more properly the province of universities and advisers.