UCAS Qualifications Information 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.

Recommendation 1: Qualification Information Profiles (QIPs)

Recommendation 1: The Qualifications Information Review recommends the development of UCAS Qualification Information Profiles (QIPs) and an associated database designed to give admissions tutors the information they need about applicants' qualifications.

To what extent do you agree, in principle, with the recommendation to develop Qualification Information Profiles and an associated database?

Strongly agree	☐
Agree	☐
Neither agree nor disagree	☐
Disagree	✔
Strongly disagree	☐

Please use this space to explain your views in more detail.

In principle Qualification Information Profiles (QIPs) may provide information that could be time-saving for admissions and other staff. However, there is insufficient detail about their content or the process for development and no information has been included about the <u>actual</u> scale and scope of the delivery and maintenance costs that would be subsequently recharged to universities.

In these circumstances, the 'in-principle' recommendation that QIPs should be introduced is not agreed pending further clarification from UCAS as to what advantages they might offer and in particular how QIPs would be developed and maintained in the short and long term and at what cost.

What would be the impact of this recommendation on you/your organisation?

Some universities have stopped using tariffs and are focusing on grades; others are using a combination of tariff and grades or mostly 'tariff-plus'. However, there is a concern that an early 'in principle' decision to adopt QIPs which leads to the tariff system not being maintained, would be unhelpful.

Moreover and more significantly, the adoption of QIPs risks undermining institutional autonomy in that it would remove a tool currently used in admissions.

As far as universities are concerned the change to QIPs would require significant staff retraining, amended advice to applicants and changes in advice provided via university-school partnerships and in outreach work.

To what extent do you agree that this recommendation supports fairness, transparency and efficiency in HE admissions?

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree
Fairness	☐	☐	☐	✔ ☐	☐
Transparency	☐	☐	☐	✔	☐
Efficiency	☐	☐	☐	✔	☐

Please use this space to explain your views in more detail.

Without further information it is not clear why and whether QIPs would deliver greater fairness, transparency and efficiency in admissions compared to the current system.

There is also a general concern that the consultation implies that universities would be forced into using QIPs rather than adopting methodologies for admission best suited to their institution / particular courses.

A number of stakeholders have identified additional information that they would value about qualifications. To what extent do you agree that the following information should be included, alongside judgements relating to academic demand?

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree
Personal skills (e.g. team working and self management)	☐	☐	✔	☐	☐
Vocationally related skills and knowledge	☐	☐	✔	☐	☐
Other (please specify below)	☐	☐	☐	☐	☐

Million+ agrees that some of this information might be useful but there are significant reservations about the recommendations in respect of academic demand. Until there is agreement about the assessment and merits or otherwise of the latter, it is not clear how additional further information would or should be included and how this might be collated and presented.

To what extent do you agree that profiles of apprenticeships and Access to HE courses should be made available to HE, alongside level 3 UK and selected international qualifications?

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree
Apprenticeships	☐	✔	☐	☐	☐
Access to HE courses	☐	✔	☐	☐	☐

Million+ agrees that profiles of apprenticeships and Access courses should be available in the current and any future system. However it should be recognised that there is a range of levels for apprenticeship qualifications and work should be focused on establishing the apprenticeship profiles that have a progression route to HE to ensure that there is clarity for applicants, employers and universities.

Some stakeholders have suggested that they would like UCAS to provide further information about other courses/qualifications/tests, such as level 2 qualifications and/or admissions tests, alongside that proposed for level 3 qualifications. To what extent do you agree that this additional information should be made available?

	Strongly value	Value	Neither value nor not value	Do not value	Strongly do not value
Level 2 qualifications	☐	✔	☐	☐	☐
Admissions tests	☐	☐	☐	☐	☐
Other, please specify below	☐		☐	☐	☐

There would be merit in this being explored in the context of the current and any future system than might be agreed.

Please indicate whether you would favour a September 2013 or January 2014 launch of the Qualification Information Profiles and associated database and why you give this preference.

Favour September 2013	☐
Favour January 2014	☐
Neither of the above	✔

The proposal to set a timetable for withdrawal of the tariff is regarded as premature and the proposal to introduce QIPs from September 2013 or January 2014 is not supported.

Insufficient information has been provided to make any decision at this stage about the merits of introducing QIPs and there are no clear indications as to how the development of QIPs could be achieved within the timeframe or what the costs would be to institutions.

In any case it is unlikely that such a timetable is consistent with the need for an effective communications strategy with the many stakeholders (including university staff) who would need to be engaged.

Please use the space below to outline what transition arrangements, if any, you think may be necessary to ensure that future applicants are not unfairly disadvantaged by implementation timing.

See above. There is no support for considering transition arrangements at this stage.

Please use the space below to outline what communications and guidance you feel would be necessary to support implementation of this recommendation.

There is no support for this at this stage although it is clear that any new system would require an extensive and comprehensive communications strategy which was supported by all stakeholders including universities.

Please use the space below to add any further comments you have about this recommendation.

Million+ believes that it would have been more helpful if the UCAS consultation had focused on the principle of QIPs with further detailed work undertaken with relevant senior staff about how any QIPs system might be achieved, delivered and maintained. A clear analysis should be presented of the cost-benefits to applicants, universities and advisers of adopting a QIPs system compared to maintaining / improving the current tariff system. It is unfortunate that the consultation has also focused on the mechanics of implementation of a system, the principles of which are not agreed.

Recommendation 2: A move towards grade-based entry requirements

Recommendation 2: The Qualifications Information Review recommends that HEIs consider the gradual withdrawal of the use of the UCAS Tariff for setting entry requirements and for offer-making, coupled with the promotion of the greater use of qualifications and grades for setting entry requirements and for making admissions offers and decisions. This would need to be accompanied by an extensive communication programme to support applicants and advisers. UCAS would commit to maintaining the existing Tariff for an agreed period of time, but would not evaluate new qualifications for inclusion after an agreed deadline.

To what extent do you agree, in principle, with the recommendation for the gradual withdrawal of UCAS Tariff points for setting entry requirements and for offer-making, coupled with the promotion of grade-based entry requirements and offer-making?

Strongly agree	☐
Agree	☐
Neither agree nor disagree	☐

Disagree	☐
Strongly disagree	✔

While some universities have moved away from the use of tariff points, this recommendation would force institutions into abandoning the tariff. As a service provider UCAS should be seeking to respond to the needs of HEIs rather than driving the abolition of a service that is utilised.

There is further concern that UCAS is not committed to maintaining the current tariff system in terms of new qualifications even though there is no agreement about whether it should be replaced and if so on what timetable.

What would be the impact of this recommendation on you/your organisation?

This would force universities into abandoning a tariff system that they still use without an agreed alternative.

To what extent do you agree that this recommendation supports fairness, transparency and efficiency in HE admissions?

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree
Fairness	☐	☐	☐	✔	☐
Transparency	☐	☐	☐	✔	☐
Efficiency	☐	☐	☐	✔	☐

No evidence has been provided as to why this recommendation would in itself create greater fairness, transparency or efficiency in HE admissions.

What are your views on the proposed timing of the withdrawal of the use of UCAS Tariff points so that grade-based entry requirements are encouraged for all courses starting in 2015 (set by HEIs in 2013).

For the reasons outline above this timetable is not agreed.

If agreed, we plan to introduce Qualification Information Profiles from September 2013. During the transition phase, there will be the need for the Tariff to run at the same time as this new system. For how long should UCAS maintain the UCAS Tariff after the introduction of Qualification Information Profiles?

We have previously made clear that million+ does not support the timetable for the introduction of QIPs from September 2013.

From when should we cease to evaluate new qualifications for inclusion in the Tariff?

UCAS should maintain the tariff system including for new qualifications pending agreement <u>and</u> delivery of any alternative system.

Please use the space below to outline what actions UCAS could take to support you/your organisation during any transition from the use of Tariff points in admissions to a qualifications and grade-based model.

million+ does not believe that consideration of transition arrangements is helpful or appropriate at this stage and in advance of agreement about principles / alternative systems.

Please use the space below to outline what communications and guidance you feel would be necessary to support implementation of this recommendation.

See above

Recommendation 3: A means of comparing 'demand' across qualifications

Recommendation 3: The Qualifications Information Review recommends the development of a rigorous means of comparing academic demand/difficulty across different qualifications, underpinned by independent criteria and validated by HE, to support HE admissions.

To what extent do you agree, in principle, with the recommendation for the development of a means of comparing 'demand' across different qualifications, underpinned by criteria and ratings validated by HE?

Strongly agree	☐
Agree	☐
Neither agree nor disagree	☐
Disagree	✔
Strongly disagree	☐

million+ disagrees with this proposal as currently outlined.

It is unclear how the UCAS draft grade equivalencies table will work in practice particularly since the equivalences are not based on an analysis of demand as the latter has not yet been undertaken. It is also unclear why UCAS has concluded that a qualifications and advisory group is likely to be more successful than the tariff expert group in supporting and maintaining the system.

It is further noted with concern that

- no cost-benefit analysis has been included to allow comparison of the maintenance of the tariff system with the development and introduction of QIPs, a qualification and advisory group and the associated publication of reports for which universities will presumably be recharged.

- not all vocational qualifications will be rated unless they are identified as a priority for demand-rating by HEIs.

Inevitably any demand rating system which excludes vocational qualifications has the potential to create a reputational risk for universities which admit students with a wide-range of vocational qualifications – particularly since the expert tariff group is not considering further qualifications. This would also be potentially disadvantageous to some applicants.

What would be the impact of this recommendation on you/your organisation?

This proposal has the potential to complicate the admissions process and increase reputational risk for institutions which recruit on a wide range of pre-entry qualifications.

To what extent do you agree that this recommendation supports fairness, transparency and efficiency in HE admissions?

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree
Fairness	☐	☐	☐	✔	☐
Transparency	☐	☐	☐	✔	☐
Efficiency	☐	☐	☐	✔	☐

million+ believes that there is no evidence to support the proposition that this recommendation would per se, deliver greater fairness and transparency. There is also no evidence tabled as to why this would produce greater efficiencies.

Please use the space below to share any comments you have on the proposed academic demand criteria outlined in the consultation document.

There is insufficient information to comment on the merits of these proposals across all subject areas / qualifications.

Please use the space below to share any comments you have on the role of the qualification advisory group, as outlined in the consultation document.

As outlined above, it is unclear why UCAS has concluded that a qualifications and advisory group is likely to be more successful than the tariff expert group in supporting and maintaining the system. We also consider that more extensive research is required on how this could be delivered across all qualifications and that the proposal has the potential to incur significant financial and resource costs which are currently unspecified.

Please use the space below to outline what communications and guidance you feel would be necessary to support implementation of this recommendation.

million+ has significant doubts about the merits of this question and considers it premature to consider the mechanics of implementation in advance of agreement in principle.

Recommendation 4: A simple qualifications metric for HE management information

Recommendation 4: The Qualifications Information Review recommends the development of a simple qualifications metric for HE management information in conjunction with HESA and HEFCE, SFC, HEFCW and DELNI and following agreement on the UCAS demand criteria and rating scale.

To what extent do you agree, in principle, with the recommendation to develop a simple qualifications metric for HE management information purposes?

Strongly agree	☐
Agree	☐
Neither agree nor disagree	☐
Disagree	✔
Strongly disagree	☐

There would need to be clear agreement about the merits and functioning of any 'demand' rating system prior to consideration of a qualifications metric. As with Recommendation 3 there is also a clear risk that such a metric will be used by other organisations, including the media to create crude ranking systems or assessments of universities.

To what extent do you agree that this recommendation support fairness, transparency and efficiency in HE admissions?

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree
Fairness	☐	☐	☐	✔	☐
Transparency	☐	☐	☐	✔	☐
Efficiency	☐	☐	☐	✔	☐

There is no evidence to support the proposition that this would increase fairness, transparency and efficiency in admissions.

Do you think that any dimensions other than academic demand and qualification size should be considered within HE management information metrics?

Yes	☐
No	✔

Don't know ☐

It is not clear that universities would find the service as currently outlined useful or that they would support the provision of such a service by UCAS.

Recommendation 5: An annual report on the use of qualifications in HE admissions

Recommendation 5: The Qualifications Information Review recommends the provision of a UCAS annual report on the use of qualifications within HE admissions.

To what extent do you agree, in principle, with the recommendation for UCAS to produce an annual report on the use of qualifications within HE admissions?

Strongly agree	☐
Agree	☐
Neither agree nor disagree	✔
Disagree	☐
Strongly disagree	☐

UCAS is not a qualifications authority and it depends what the report contained. If it was straightforward reporting of number of applicants in respect of particular pre-entry qualifications e.g. A-level / non-A-level there would seem to be no reason why this would need an Annual Report devoted exclusively to this subject / information.

To what extent do you agree that this recommendation support fairness, transparency and efficiency in HE admissions?

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree
Fairness	☐	☐	✔	☐	☐
Transparency	☐	☐	✔	☐	☐
Efficiency	☐	☐	✔	☐	☐

million+ is not clear why in principle the publication of such an Annual Report would support greater fairness or transparency and why it would provide a more efficient service in respect of HE admissions.

When in the academic year should this report be published so that it can be most helpful in supporting HE admissions?

In broad terms we are not clear why the publication of an Annual Report devoted to this information is necessary.

Please use the space below to outline what communications and guidance you feel would be necessary to support implementation of this recommendation.

This should not be a matter of separate communications and guidance.

Recommendation 6: Optional admissions tools

Recommendation 6: The Qualifications Information Review recommends the provision of optional admissions tools for those HEIs wishing to make more flexible grade-based offers, subject to consultation with the sector.

To what extent do you agree, in principle, with the recommendation to provide optional admissions tools for those HEIs wishing to make more flexible grade-based offers?

Strongly agree	☐
Agree	✔
Neither agree nor disagree	☐
Disagree	☐
Strongly disagree	☐

This proposition is worth further exploration. Until this is undertaken and the options investigated in detail million+ does not consider it helpful or appropriate to comment on the other questions related to this proposal.

Releasing the full potential of the review outcomes

UCAS is committed to ensuring that its products and services are strengthened in light of any agreed changes, so the benefits of the new qualifications information system are fully shared with learners, applicants, schools and colleges. Please use the space below to share any comments or suggestions regarding ways in which UCAS products and services might be revised in light of the proposals made in the consultation document.

Do the proposals outlined in the consultation documents take sufficient account of the education and HE environment in your part of the United Kingdom?

Yes	☐
No	☐
Don't know	☐

Do you believe that the proposals outlined in this document will be sufficiently flexible to accommodate any future changes to the UK qualification and examination systems?

Yes	☐
No	✔
Don't know	☐

Implementation and resourcing

The introduction of a new qualifications information system should deliver efficiency gains for HE providers. Please outline any views you have on the perceived efficiency benefits of the proposals and any suggestions for how any disadvantages could be minimised.

The cost of developing, delivering and running the new service will be met by UCAS. This means that there might need to be a small increase in the capitation fee. If you work for an HEI, would your institution be willing to pay a small increase for access to this enhanced service?

N/A, I do not work for a HEI	☐
Yes	☐
No	☐
Don't know	☐

There are significant reservations among universities about paying more for UCAS services.

If the proposals are agreed, UCAS plans to support implementation through a comprehensive, long-term engagement programme aimed at HE admissions staff, learners and their advisers. We would welcome comments on the particular needs of different stakeholder groups, especially more mature learners and those learners who have limited access to high quality information and advice.

There are significant challenges in providing information for the diverse student profile which should be recognised by UCAS in all service areas.

Further Comments

million+ welcomes the opportunity to comment on these proposals. However we are disappointed that this consultation focuses on mechanisms for implementation and asks for valued judgements when the principles and modes of delivery are not agreed or in several cases not clear.

No transparent case has been put forward which provides an opportunity to compare improving the current system with abandoning the latter in favour of a QIPs system. There is no obvious reason why the latter would be any easier to maintain and deliver than the current tariff system and there are risks that abandoning the latter will disadvantage institutions and applicants who continue to make use of it.

We are also very concerned that the proposals in respect of assessing the academic demand of qualifications lack clarity and are underdeveloped but also could be used in ways which might create reputational risk either in terms of applicants or institutions. In any case, this is a much more complex task than has been suggested and one that requires further research and an assessment of the costs of development and maintenance. Currently no estimates of the latter have been provided.

Even if it was concluded that there was merit in this proposal it is not clear how or why UCAS rather than the exam boards or Ofqual should have the responsibility to develop and maintain such a system, bearing in mind that the qualifications themselves are used for purposes other than HE admissions. It would also appear that significant costs could be recharged to universities to develop and maintain a system which would potentially be used by other stakeholders.