

DRAFT CONSULTATION RESPONSE

DfE consultation on post-qualification admissions reform

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Initial Questions

1. On a scale of 1-5 (where 1 = highly dissatisfied and 5 = highly satisfied), how satisfied are you with the present admissions system?

n/a

2. Would you, in principle, be in favour of changing the current Higher Education admissions system to a form of post-qualification admissions, where students would receive and accept university offers after they have received their A level (or equivalent) grades?

Yes/No

Please state the reason for your response and if it relates to a specific delivery model.

In principle, a system that provides applicants with more information prior to decision making is a positive step. However, how any new system is implemented is a vital consideration. It needs to be one that works effectively for all potential applicants and doesn't simply replace old advantages for some applicants with new advantages for other applicants.

It appears that a decision has been taken by the Department for Education that the system of higher education applications in England will change. However, as the system currently managed by UCAS is UK wide, open to all candidates and higher education institutions in all four nations, extreme care must be taken when introducing any change. There is long-standing respect for the UK higher education sector, which has a strong global reputation. Any changes must take this into account, and ensure this reputation is not damaged. It is also vital that changes based on the needs of English applicants and providers do not damage the experiences of applicants and providers in Scotland, Wales or Northern Ireland.

MillionPlus represents all seven of the modern universities in Scotland, and consequently has a particular interest in how this affects Scotland. The models that have been put forward in this consultation have been designed primarily with the A level timetable in mind and how to reduce complexity for these students. There is a risk that the proposals could actually increase complexity for those applying with Scottish qualifications, or applying from a Scottish college. The challenges with regard to start date of the new academic year are perhaps even more acute for Scottish applicants and Scottish institutions. Different systems are in place in England and Scotland with respect to the allocation of places and number controls. The extra pressure created for admissions staff at universities will manifest differently north and south of the border. Some consideration needs to be given to striking a balance between the effects of any new admissions model across the whole of the United Kingdom.

Some proponents of PQA have suggested a model in which post-qualification applications and offers take place from August onwards with no changes to Level 3 results dates, but with HE terms starting anytime between November and January. However, we have ruled out specifically considering this as a potential delivery model for the following reasons:

- The considerable gap between the end of school/college and the start of university could pose a challenge to students, particularly for those from disadvantaged backgrounds. There is a risk that these students would have no source of income during this period and then don't progress in to HE.
- Starting the academic year in November would create a very short first term prior to the Christmas break, whilst running an academic year from January to October would be out of sync with most European nations, and many non-European countries, including those from which many international students currently enrol.
- As the exam/result timetable in other northern hemisphere countries usually means that students receive their results in the summer, it could have implications for where international students choose to study.
- This model could involve a considerable loss of income for higher education providers in the transitional year (up to three months' worth of tuition fee and accommodation revenue).

1. If you think these issues should not rule out consideration of the model above, please explain why, providing supporting evidence where possible.

Questions for Model 1 (applications made after results day)

1. Do you think this system would be better than the current system, worse, or no significant improvement? In the text box below, you can refer to the potential costs, adverse effects or implementation challenges of such a reform.

- Better than the current system
- Worse than the current system
- No significant improvement

n/a

2. Please provide your views on Level 3 results day being brought forward to the end of July, in order to provide time for students to apply to Higher Education, with their Level 3 results already known. What effect do you think this could have on students, teachers, schools and colleges and how best could this be facilitated?

There are two key issues to be considered.

First, the amount of time available to mark assessments to meet this deadline. External qualifications are often assessed by current teachers, meaning that until the last week July marking capacity is limited. This proposal will inevitably create significant pressure on assessors and moderators to ensure results are available before the end of July. In order to maintain the same fairness that applies in the current system, no results should be released until all results are available. The risk of delay is increased when there is a shorter period within which to finalise all results.

Second, the time available for students to investigate options for higher education. Knowing results prior to applications does provide students with certainty, which for many will be an advantage in the process. However, there are many other factors about a higher education course that students want to take into account and consider as part of their application making process. The issue with this shorter window is that it potentially removes opportunities for things like open days, taster sessions, conversations with course leaders, advice from school/college advisers and so on. The focus will inevitably be on matching grades to advertised thresholds and other important aspects of a university offer may be ignored. This is likely to be particularly problematic for students from disadvantaged

backgrounds who wish to be clear about support available, or the environment on campus, or the atmosphere in the location, before making an application. The limited time makes this much more challenging.

In addition to this, and linked to our response question 2 in the initial questions, there needs to be consideration given to how changing the results day in England will impact on the other nations of the United Kingdom.

Under Model 1, a PQA system could mean there is a shorter window between students getting their Level 3 (A Levels and equivalents) results and the deadline for applying to university, and they could be applying during the summer holidays.

3. Please provide your views on the support applicants will need to make their applications to Higher Education under this model, and do you have views on when and how this could be offered? How could students best prepare their application for HE before they receive their Level 3 (A Level and equivalent) result?

This can include reference to support for researching and completing applications, deciding which offers to accept, and support put in place before they start HE. It could also refer to ensuring that all applications are treated fairly by higher education providers.

The current system creates a specific period of time for many applicants (e.g. those in schools or colleges) to consider options, seek advice, contact potential universities, attend open days and so on. A new system that shifts applications to after results should seek to maintain the current time period for the associated events (e.g. from September to March prior to the assessment period). This will create purpose and focus for research and investigation into potential courses by applicants, but also provide universities with an appropriate window within which they can advertise courses, send information to applicants etc.

4. Do you have views on any additional factors that should be considered in relation to potential effects on disadvantaged groups, and students with disabilities, mental health issues or other special needs?

5. Please provide your views on how additional entry tests, auditions and interviews could be accommodated under this model.

6. Under this model, would you expect there to be implications for the way in which students apply, which for most undergraduate students is currently through a centralised admissions service (UCAS), rather than directly to higher education providers?

Yes

No

Not sure

If yes, what implications and why?

7. Should there still be limits on how many courses they can apply to?

Yes

No

Not sure

If yes, what limits and why?

8. If you are a higher education provider, we would be interested in your views of how quickly applications could be processed under this model.

Please provide your views on any additional implications under this model for students, higher education providers and courses not already covered above.

Questions for Model 2 (applications pre-results; offers post-results)

Under Model 2, students may not be provided with predicted grades to apply to HE with.

1. Do you think this system would be better than the current system, worse, or no significant improvement? In the text box below, you can refer to the potential costs, adverse effects or implementation challenges of such a reform.

- Better than the current system
- Worse than the current system
- No significant improvement

No new system will be 100% effective. There are challenges with the current application system, which this consultation is aimed at addressing. However, any new system will also come with challenges. Some of these are impossible to predict or anticipate.

The consultation document outlines what it sees as the major problems with the current system and puts this forward as a rationale for reform. MillionPlus would question whether the sources cited here represent a broad enough body of evidence to assess the value of the proposals. For example, on the issue of “undermatching”, new evidence has come to light since this consultation was published that suggests there is also a considerable level of “overmatching” in the system.¹ This analysis suggests that across the full cohort of students, predicted grades actually benefit students from lower socioeconomic backgrounds, compared to their more advantaged peers, because of their grade profiles are lower on average.

Furthermore, the underlying assumption of what is written on page 8 of the consultation document relating to underpredicting and undermatching assumes that a perfect symmetry of grades is achievable, and that it might be satisfied through these reforms. This is problematic because it misunderstands student choice. Research by leading academics in the field of higher education studies has shown that student choice is complex and multi-faceted. There are multiple factors that shape student choice that sit outside of their grade profile, or the entry requirements of courses. There is a danger that students are hyper-rationalised as economic calculators of costs and benefits. The university experience is of course much broader than that, and so are applicants’ motivations.

The point here is that even if a system is introduced that increases the aspiration of applicants, the effect on student choice could be limited. The city, campus location, course and specific university environment will all continue to greatly influence student choice in a system of PQO. MillionPlus is supportive of any measures that can boost the aspiration and opportunities of those from the most deprived backgrounds across the UK. But it is important to consider the possibility that the benefits of a system of PQO could be reduced to a limited impact amongst a sub-section of disadvantaged students.

¹ <https://www.hepi.ac.uk/2021/03/18/where-next-for-university-admissions/>

Introducing such a fundamental restructure of the system could also trigger unintended consequences. As mentioned above, it is very difficult, indeed almost impossible, to predict challenges that will be faced in a system for which there is no precedent. There is the fundamental question of whether this actually is going to be a net benefit for all disadvantaged students, as discussed above. But it is also possible that the implementation could throw up some logistical issues. Seldom does a new system find equilibrium in the first year of implementation.

The claim in the consultation that the current sequencing (confirmation then clearing/adjustment) is overly complex is puzzling. Schools, universities and applicants generally understand the current system as straightforward: decide on any offers in confirmation, move into clearing if no offer is held or applicants want to trade up. A system of PQO would effectively be squeezing the time period in which offers and acceptances are made in the admissions cycle. This adds a number of pressures, to students and institutions respectively. The decision-making process is shorter for students. The risk is that if not properly managed, this could make the process more frenetic, by bringing elements of clearing into the overall system. This could in theory help those students who are “undermatched”, but it could equally add extra pressures for disadvantaged students, causing them to play safer with their choices if they do not have the proper support or guidance during the process. There is no way of knowing this before actually testing the system.

This also links to the extra pressures on institutions. A system of PQO will bring with it extra pressures on staffing and other resource for schools and universities. There is a key difference between the model of PQO that is outlined in this consultation and that put forward by the UUK Admissions review. The crucial difference is that in the Government’s proposals UCAS will hold the applications and these will not be shared with HEIs until results day. MillionPlus does not believe this is practicable for the sector. It is important that institutions have some window of time to plan effectively for results day with at least some information on applications. Without this, the level of uncertainty risks disorganization and a level of unpredictability that is not in the interests of providers or students. MillionPlus believes that a model of PQO more akin to that proposed in the UUK Admissions review is therefore more workable. In either model, there are considerable implications for university admissions teams who will have to reorganize their calendars in order to suit the system.

If disadvantaged students are to be properly supported through the process over the summer in a PQO system, this has implications for the timetabling of staff in schools colleges and universities. Middle-class students are unlikely to suffer as much from schools being closed and less support being available to them over the summer.. There are also other areas that could be implicated indirectly. For example, the allocation of residential accommodation owned by universities, or the accessibility of accommodation elsewhere. All these issues present potential potholes for a new system. MillionPlus is not opposed to reform per se, but these issues need to all be factored in to any assessment of the benefits of a new system.

2. Please provide your views on the support applicants will need to make their applications to Higher Education under this model, and do you have views on when and how this could be offered?
This can include reference to support for researching and completing applications. It could also refer to ensuring that all applications are treated fairly by higher education providers.

Support needs are unlikely to be different regardless of whether the current system remains in place or either of these two systems are introduced. Students require support to understand course requirements, how their attainment and experience meets these requirements, what other elements of

provision are available beyond the teaching of the course. To provide this support requires time for students to consider their own needs and expectations, and match that with the information offered by providers. Therefore, our views on this are the same as our views in response to the same question regarding Model 1.

The current system creates a specific period of time for many applicants (e.g. those in schools or colleges) to consider options, seek advice, contact potential universities, attend open days and so on. A new system that shifts offers or applications to after results should seek to maintain the current time period for the associated events (e.g. from September to March prior to the assessment period). This will create purpose and focus for research and investigation into potential courses by applicants, but also provide universities with an appropriate window within which they can advertise courses, send information to applicants etc.

3. Do you have views on any additional factors that should be considered in relation to potential effects on disadvantaged groups, and students with disabilities, mental health issues or other special needs?

As implied in our answer question 2, it is possible that many disadvantaged students and those with disabilities, mental health issues or special needs are benefiting from the current admissions more so than they would in alternative systems. Focusing exclusively on one subset of (disadvantaged) students who are perceived to lose out in the current system, and letting these observations drive quite radical reforms, could be short-sighted. MillionPlus is open to a system that improves the admissions process for those who are underpredicted and undermatched. But in order to make a reliable evaluation of any alternative system there needs to be a proper assessment of the net impact (benefits and drawbacks) for all disadvantaged students. There also needs to be an appreciation that for students with different support needs, alignment of entry tariff and prior attainment is not always the best indicator of the best offer. The individual student is almost always better placed to make this judgement than any third party analysis of grades. There is a more general point here, that there does not appear to have been any research undertaken that shows the student voice. The underlying assumption is therefore that either students do not like the current system (which there is no evidence offered to support in the consultation document), or students do not understand why the current system is flawed (which is problematic).

4. Please provide your views on how students could make choices on which courses and institutions to apply for under this model. Your answer could reference the use of ongoing assessment, mock exam grades and prior attainment (e.g. at GCSE).

Under this model, would you expect there to be implications for the way in which students apply, which for most undergraduate students is currently through a centralised admissions service (UCAS), rather than directly to higher education providers?

Yes

No

Not sure

Not sure

UCAS provides an important service to the sector in administering a substantial proportion of all applications to universities. MillionPlus does not have any reason to believe that model 2 would

engender a significant shift in how applicants apply. But it is very hard to predict this without more details on how the system would function prior to any trial run/implementation phase. One thing that is important, through any reform to the system, is that flexibility is maintained for applicants so that no barriers are put in place for those who might be applying to university.

If yes, what implications and why?

6. Should there still be limits on how many courses they can apply to?

Yes

No

Not sure

If yes, what limits and why?

7. If you are a higher education provider, we would be interested in your views of how quickly applications could be processed under this model.

Please provide your views on how additional entry tests, auditions and interviews could be accommodated under this model.

Under Model 2, offers would be made to applicants after results day, outside of term time.

9. Please provide your views on the support students will need to make their applications to Higher Education under this model, and do you have views on when and how this could be offered?

Please provide your views on any additional implications under this model for students, higher education providers and courses not already covered above.

Further Questions

A PQA system could remove the requirement for school and college teachers to provide predicted grades for students applying to Higher Education through UCAS applications.

Implementing PQA could have practical implications across the education system, not only Higher Education. Depending on how PQA was delivered, it could mean bringing Level 3 "Results Days" forward in schools and further education colleges, potentially making changes to examination dates and setting up different support arrangements for students applying to Higher Education. For universities, the processing of applications may need to be done over a shorter period, and we are looking for views on how application processes that typically involve information in addition to Level 3 results, such as auditions, interviews or additional exams, can be incorporated into PQA delivery.

1. Please provide your views on how the education sector could support the implementation of a PQA system. This can refer to the roles of schools, further education colleges, higher education providers and charities/representative bodies and can include suggestions around staffing, infrastructure and funding.

The vast majority of applications to undergraduate courses are currently processed through UCAS. Students who apply to Oxford or Cambridge and for medicine, veterinary and allied courses make their applications by October 15 of the year before they start. Applications for all other courses have to be made by January 15 of the following year. As part of the application process, teachers supply references and predicted grades, and applicants write a personal statement. Higher education providers receive applications once the deadlines have passed, and can start to make offers through the UCAS system from then onwards.

In recent years, some, including The Sutton Trust and the HE Access Network have argued for the removal of personal statements from the application process. They argue that an applicant's school type is a key predictor of the quality of their personal statement, with those from more advantaged educational

backgrounds more likely to receive support and guidance. Evidence shows that in analysis of statements written by young people who would go on to achieve identical A level results, clear writing errors were three times more common in the personal statements of applicants from sixth form colleges and comprehensive schools, than in statements of applicants from independent schools

The differences in the written quality of the statements was, in the authors' view, likely to be a result of the differing levels of support and guidance rather than academic ability.

2. Should personal statements be removed from the application process?

Yes

No

Not sure

Not sure.

This question appears to be completely orientated around the admissions process at highly selective universities. The evidence cited is from the Sutton Trust, which focuses exclusively on admission to elite institutions. Focusing on this part of sector is not a problem per se, but it ignores the value that personal statements might offer to other parts of the sector. For many modern universities, who are more active recruiters of undergraduate students, the personal statement can play a useful role in gaining a holistic understanding of the applicant. The work cited, while a valuable contribution to the debate, also perhaps overestimates the importance of personal statements in the admissions process at highly selective universities. Grades are the critical factor determining entry to selective universities and personal statements are only ever a secondary consideration (if considered at all in any meaningful way). If there is evidence to suggest that personal statements enable unconscious bias and are damaging to the chances of disadvantaged students in attending highly selective universities, then steps should be taken to change this. But this is arguably a matter for the admissions departments at highly selective institutions, not the sector at large. The important question is, if personal statements are removed, what replaces them as an auxiliary filter for institutions, and how do we know this is better? The elephant in the room here is that attainment is a far more significant factor in reproducing inequalities in education than the influence of personal statements. Reverting to attainment alone (with no personal statement) in the admissions process, may be in the interest of a certain number of disadvantaged students with high levels of attainment, which is of course to be welcomed. But at the macro level the impact is questionable. Once again, it is important to ask whether the reforms are a net benefit for all disadvantaged students?

3. Please provide your views on the impact of schools and colleges no longer using predicted grades to guide students in their higher education choices.
4. International students are not currently in scope of proposed PQA for a number of reasons (international exams work to different timetables outside the UK, many international students do not apply for UK courses via UCAS and international students require additional time ahead of term starts to apply for/be granted visas etc). Do respondents agree this is the correct approach given circumstances? If not, what are the key reasons as to why international applicants should be included in scope?
5. Please provide any views that you have on treating applications from students who do not currently apply through UCAS, and in particular whether a move to a PQA system would imply changes in how applications from non-UCAS applicants are considered.

6. Please provide any additional thoughts, ideas or feedback on the policy proposals outlined in this document.