

# Model 1: Consultation Response

DfE consultation on Post-Qualification Admissions Reform

Submitted: 12<sup>th</sup> May 2021

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Consultation: [original link](#)

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

1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>	4 <input checked="" type="checkbox"/>	5 <input type="checkbox"/>
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**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?**

**No**

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

There is clearly a need to review aspects of the Higher Education admissions system and address current challenges.

There are particular challenges linked to the role of predicted grades. Predicted grades are generally inaccurate, as has been noted elsewhere. (<https://www.hepi.ac.uk/2021/04/22/mark-corver-predicted-grades-and-university-admissions/>).

The focus of these reforms seem to be on the challenges of under, rather than over-prediction.

Under-represented applicant groups are more likely to be under-predicted when they apply, and therefore face challenges in applying to highly selective institutions. These students may not choose to apply to these highly selective institutions as they may not expect to achieve the necessary grades. These students will not be helped by model 2 as they will still rely on expectations of grades, however these are generated and shared, and they will still not apply. Model 1 might help them but there are many other challenges with this model as described below.

The impact of over-prediction is that either students are admitted despite missing their offer grades, or they find a place through clearing. Model 2 does not help those students who would have been admitted despite missing their grades. Model 1 might help them but there are many other challenges with this model as described below.

If inaccurate predicted grades and the impact they have on admissions at highly selective institutions are the main driver behind reform, then we suggest it would be better to review how predicted grades are calculated, and how they are used rather than change the whole system unless there are wider benefits. For example, you could remove predicted grades from the admissions system and ask universities to make decisions without them, without changing to a system of post-qualification admissions.

We accept that the government and the OfS have concerns about other aspects of the admissions system, including unconditional offer making. While we have consistently argued that there are benefits to unconditional offers for some students in some circumstances, we accept that this is not the government's view. However, unconditional offers have been limited by the current temporary licence condition in place over in the past year, and this could become a permanent arrangement.

There are some aspects of a post-qualification admissions system that would create new challenges and perhaps not be in the best interest of applicants.

As highlighted by UCAS in their report on reimagining admissions in April 2021, we are concerned that the short time frame for admissions will in practice reduce a student's choices and scope to exercise that choice. Decisions will need to be made quickly. More support from schools and colleges will be required during the

summer period. This is a challenging time for schools already given that they are also dealing with support following GCSE results and holidays.

There is potential under a post-qualification system for HE providers to increase their focus on grades when making decisions instead of looking at applications holistically. This is partly because the system will be driven by grades, and partly because the time limitations inherent in either model will make it harder to take a broader view. This may also have an impact on contextual admissions.

There are also very real practical problems which have an impact on applicants, and disproportionately so on under-represented and disadvantaged students. In the current system applicants receive their offers months in advance of enrolment, allowing them to establish a relationship with their chosen universities. These relationships will be weaker if applicants do not receive their offers until August and this could potentially lead to an increase in drop-out rates. There is a parallel here with current clearing arrangements - UCAS data demonstrates that applicants applying for the first time in Clearing are more likely to drop out of university (see <https://www.ucas.com/file/440906/download?token=xYT93dPW>).

A post-qualification system will also make it difficult for applicants to finalise their living and financial arrangements, particularly if they have caring responsibilities or other needs. Finding accommodation is a challenge for many students, and particularly for those students who get a place through Clearing. Having all students applying for accommodation closer to the start date will make this process much more challenging and potentially stressful for students, who will have less time to shop around and may therefore make less informed choices. Disadvantaged students may have a particular challenge in this context if they cannot travel to visit accommodation and they will be particularly impacted by the cost implications of having to take the first available option. Students with particular needs linked to disability, caring responsibilities or wellbeing concerns may find it harder to find accommodation that suits their needs.

There is a specific concern for those programmes with integrated placements, such as healthcare programmes. In this model, the timeframe will make it very difficult to make arrangements for placements with Trusts. This has particular implications for mature students, those with disabilities and those with caring responsibilities, who need to consider travel and living arrangements. Placements are often not close to the campus.

We currently use the time between offers being accepted and the start of the year to contact students about support for disabilities and to consider reasonable adjustments. This work would be condensed into a very short period under both models, which would put pressure on resources and also make it harder to ensure that support was in place in time for the start of the year.

We are concerned about the impact on students – both with respect to motivation and anxiety.

Having a conditional offer in place has a “motivational effect” for students (this is one of the reasons that the government has given for opposing unconditional offers). This is enhanced where the offer is from a chosen university, where a relationship has been built up over time through events and communications, accommodation is booked, conversations have been held about student support, and the student has had the opportunity to link up with other offer holders, consider their extra-curricular activities and visualise their next steps. Post qualification admissions reduce this motivation. Students will not know exactly what they need to achieve. Even if they achieve the published grades for their preferred choice at their preferred university they may not be able to get a place because they first have to go through a rapid and system wide selection process - effectively a giant “clearing” process. While the motivation to do well remains, it is more general and less focussed.

There is a risk that increased levels of uncertainty about their future will increase anxiety for students when they are already stressed by their exams.

We note that there is a risk in any new system that “informal” offer making and assurances to students outside UCAS, which already take place according to anecdotal evidence, are likely to grow. Some universities may choose to opt out of the UCAS system altogether. We propose that all applications for Home UG students should be required to go through UCAS if a PQA model is adopted.

We also note that there is a risk with these changes that highly selective institutions will move towards new barriers for admissions, in order to achieve more certainty on admissions, such as individual tests and

certifications. These are potentially exclusionary for students from disadvantaged groups. Disadvantaged students may not be able to afford to take such tests, may not be aware, of them, may not have the support at school to prepare for them, and may be discouraged from taking them because they are not expecting to achieve the required grades.

## PQA Delivery and Implementation

Delayed start to November and January: not under consideration

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

We do not support a model with a delayed start to November or January for the reasons given in the consultation.

## Model 1: 'post-qualification applications and offers'

### 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.

<input type="checkbox"/> Better than the current system	<input checked="" type="checkbox"/> Worse than the current system	<input type="checkbox"/> No significant improvement
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This system would be worse than the current system for the following reasons:

For subjects which require interviews, these are normally undertaken between December and March. If the application process begins at the end of July, interviews will need to be undertaken in a very compressed timetable in August which would be difficult to arrange and result in some applicants not being able to secure their place until late August. This would increase HE providers' reliance on grades when making decisions, encourage them to become more selective and therefore reduce the focus on potential and reduce diversity.

There is a specific concern for those programmes with integrated placements, such as healthcare programmes. In this model, the timeframe will make it very difficult to make arrangements for placements with Trusts. This has particular implications for mature students, those with disabilities and those with caring responsibilities, who need to consider travel and living arrangements. Placements are often not close to the campus.

It will be difficult for applicants to establish a relationship with their chosen university until the application process begins at the end of July, potentially resulting in increased dropout rates once they start at university (this risk is illustrated by UCAS data relating to clearing students, see page 7 of <https://www.ucas.com/file/440906/download?token=xYT93dPW>).

Applicants would not receive their offer until August at the earliest, which would leave a very small window to complete university joining procedures, such as securing accommodation, student finance and (for some programmes) undertaking Disclosure and Barring Service and occupational health checks. This would disproportionately affect disabled students, as there will be little time to consider necessary and reasonable adjustments, and those with caring responsibilities who need time to put the appropriate arrangements in place.

Finding accommodation is a challenge for many students, and particularly for those students who get a place through Clearing. Having all students applying for accommodation close to the start date will make this process much more challenging and potentially stressful for students, who will have less time to shop around and may therefore make less informed choices. Disadvantaged students may have a particular challenge in this context if they cannot travel to visit accommodation and they will be particularly impacted by the cost implications of having to take the first available option.

Postponing applications until after results are known would put increased pressure on applicants at the time that they take their exams, because they do not know whether they are likely to be accepted at their chosen provider.

Having a conditional offer in place has a “motivational effect” for students (this is one of the reasons that the government has given for opposing unconditional offers). This is enhanced where the offer is from a chosen university, where a relationship has been built up over time through events and communications, accommodation is booked, conversations have been held about student support, and the student has had the opportunity to link up with other offer holders, consider their extra-curricular activities and visualise their next steps. Post qualification admissions reduce this motivation.

Universities will be unable to forecast student numbers until a month before courses are due to begin and it will be difficult to administer this process in such a short time scale. There are implications for staffing at universities at a time when staff are usually very busy preparing for the new academic year. In particular it is not clear how long a window there will be to issue offers (how long after results day will students have to make choices, how long will universities have to make decisions, what will the clearing process be for unplaced students?).

**Model 1: 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?**

Even if the change to a post qualification system is not made, an earlier results day would be beneficial to students who would be able to confirm their place earlier than is the case at present. An earlier confirmation would improve the transition between Level 3 study and joining university. However, it would also put extra pressure on schools and colleges to complete the exam and appeals process by the end of July.

This change, while essential in Model 1, would not be sufficient to overcome the challenges we have identified above with this model.

**Model 1: 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.

Students will need some information about what grades they may achieve to inform which universities they choose to apply to. However they are calculated, this is likely to take the form of predicted grades in some form. We agree that there are challenges with predicted grades as they are currently implemented but we believe that the 2021 approach to teacher assessed grades may inform a better system for predicting grades in future.

Students would require support from schools and colleges with their choices during a period when teaching staff may be unavailable and when advice would need to be provided in a very compressed period of time to a large number of students.

We believe that in this scenario, there would need to be clear deadlines and rules about offer making to ensure maximum fairness and not “first come, first served” - universities should be required to use a gathered field approach. However, the challenge with this is that there are likely to be some students who are not placed in a first round, so that a version of “clearing” is required. These students will have even less time than now to make their choices and will be at an even greater disadvantage than Clearing students are now in terms of choices and accommodation.

**Model 1: 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?**

The university has a responsibility to ensure that applicants with a disability, mental health issue or other special need will be able to participate in core activities effectively and safely, both in terms of their own health

and safety and that of others. A reduced timeframe would impact the ability to carefully consider these factors and put arrangements in place before the start of term which may be detrimental to vulnerable students.

Earlier identification of this provision is considered to be to the benefit of the offer-holders/students. Where it is only identified shortly before or even after a student starts a course that they may be unable to complete mandatory requirements, this results in an added disadvantage to the student (on top of the possible need to withdraw from the course), as there will be fewer alternative options open to them for that academic year and they are likely to have already made financial commitments such as for accommodation. Where it is concluded that an individual is able to complete mandatory course requirements with reasonable adjustments in place, but those adjustments are significant/complex, late identification of the student's support needs are likely to result in a delay in putting the appropriate support in place which is likely to prejudice their experience of and performance on their chosen course which might have been avoided if support was discussed at an earlier stage.

#### **Model 1: 5. Please provide your views on how additional entry tests, auditions and interviews could be accommodated under this model.**

Interviews are normally undertaken 6-9 months before the start of the academic year. This enables the university to allocate sufficient time to each applicant for their interview and enables the applicant to receive their offer early enough to choose which university they would like to attend and make necessary preparations for joining higher education.

If the application process begins at the end of July, the amount of time required to undertake each interview would need to be reduced. Instead of face-to-face, interviews could be conducted via video conference or telephone but even with this change it would be difficult to complete the process within the timeframe.

These types of selection method can be valuable for considering student potential in context to exam grades, so constricting the time available for this activity would have a detrimental impact on widening participation.

We note that there is a risk with these changes that highly selective institutions will move towards new barriers for admissions, in order to achieve more certainty on admissions, such as individual tests and certifications. These are potentially exclusionary for students from disadvantaged groups. Disadvantaged students may not be able to afford to take such tests, may not be aware, of them, may not have the support at school to prepare for them, and may be discouraged from taking them because they are not expecting to achieve the required grades.

#### **Model 1: 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?**

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Not sure
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##### **If yes, what implications and why?**

In the current system, applicants are able to begin their application 16 months before the start of the academic year and submit their application to their chosen universities 12 months before. This allows applicants to give careful consideration to the university they would like to apply for. It also allows universities to build relationships with the students long before the applicant is asked to make a choice.

Under this model, applicants will not be able to apply until their results are known which means they may be more inclined to contact universities directly and possibly receive written/verbal agreements from universities before the application and offer process has begun. We propose that all applications for Home UG students should be required to go through UCAS if a PQA model is adopted.

#### **Model 1: 7. Should there still be limits on how many courses they can apply to?**

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Not sure
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##### **If yes, what limits and why?**

The choice limit set by UCAS is currently five (six if they apply through the UCAS Extra system). A limit on the number of courses an applicant can apply to allows universities to forecast the number of students they are

likely to recruit, therefore the removal of this limit would negatively impact the ability to manage student numbers. Removing the limit would potentially make the admissions process unmanageable for universities, in an already reduced time frame, if as a result they receive far more applications than they do now.

**Model 1: 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.**

Universities will be unable to forecast student numbers until a month before courses are due to begin and it will be difficult to administer this process in such a short time scale.

It is not clear how long a window there will be to issue offers, how long after results day will students have to make choices, how long will universities have to make decisions, what will the clearing process be for unplaced students?

We believe that under Model 1, there would need to be clear deadlines and rules about offer making to ensure maximum fairness and not “first come, first served” - universities should be required to use a gathered field approach. However, the challenge with this is that there are likely to be some students who are not placed in a first round, so that a version of “clearing” is required. These students will have even less time than now to make their choices and will be at an even greater disadvantage than clearing students are now in terms of choices and accommodation.

A significant amount of additional resource would be required. This model would mean that there would be an increased focus on grades only, and there would be less time for a consideration of wider potential.

Interviews are normally undertaken 6-9 months before the start of the academic year. This enables the university to allocate sufficient time to each applicant for their interview and enables the applicant to receive their offer early enough to choose which university they would like to attend and make necessary preparations for joining higher education. If the application process begins at the end of July, the amount of time required to undertake each interview would need to be reduced. Instead of face-to-face, interviews could be conducted via video conference or telephone but even with this change it would be difficult to complete the process within the timeframe. These types of selection method can be valuable for considering student potential in context to exam grades, so constricting the time available for this activity would have a detrimental impact on widening participation.

The university has a responsibility to ensure that applicants with a disability, mental health issue or other special need will be able to participate in core activities effectively and safely, both in terms of their own health and safety and that of others. A reduced timeframe would impact the ability to carefully consider these factors and put arrangements in place before the start of term which may be detrimental to vulnerable students.

There is a specific concern for those programmes with integrated placements, such as healthcare programmes. In this model, the timeframe will make it very difficult to make arrangements for placements with Trusts. This has particular implications for mature students, those with disabilities and those with caring responsibilities, who need to consider travel and living arrangements. Placements are often not close to the campus.

There are implications for staffing at universities at a time when staff are usually very busy preparing for the new academic year.

**Model 1: 9. Please provide your views on any additional implications under this model for students, higher education providers and courses not already covered above.**

We believe that this model would have serious negative implications for applicants in terms of their choices, and their outcomes, with potential for particularly negative impact on disadvantaged and under-represented groups, as we have set out above.

## Model 2: ‘pre-qualification applications with post-qualification offers and decisions’

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.

<input type="checkbox"/> Better than the current system	<input checked="" type="checkbox"/> Worse than the current system	<input type="checkbox"/> No significant improvement
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This system would be worse than the current system for the following reasons:

It is not clear how students would have the information they require to inform their applications – we believe that this is likely to take the form of some form of predicted grades. In that case there is no advantage to this system compared to current one, as students may still limit their applications according to under-predictions. More of these students may receive offers from highly selective universities– but only if they apply. Some students may not receive any offers in model 2 and have to go through a shorter and more pressurised “clearing” process than now. We do not believe that these under-predicted students will be helped by model 2.

The impact of over-prediction in the current model is that either students are admitted despite missing their offer grades, or they find a place through clearing. Model 2 does not help those students who would have been admitted despite missing their grades.

It is not clear how much information will be available to universities about applications before results are available. If, as UCAS propose, we receive detailed information and are able to process interviews, and reject those who do not meet our requirements, the disadvantages of this model in terms of university decision making are less. If we are not able to do this, then the disadvantages are the same as for model 1, i.e. interviews will need to be undertaken in a very compressed timetable in August which would be difficult to arrange and result in some applicants not being able to secure their place until late August. This would increase HE providers’ reliance on grades when making decisions, encourage them to become more selective and therefore reduce the focus on potential and reduce diversity.

It will be difficult for applicants to establish a relationship with their chosen university if they do not receive offers until a month before they are due to join, potentially resulting in increased dropout rates once they start at university (this risk is illustrated by UCAS data relating to clearing students, see page 7 of <https://www.ucas.com/file/440906/download?token=xYT93dPW> ).

There would be a very small window to complete university joining procedures, such as securing accommodation, student finance and (for some programmes) undertaking Disclosure and Barring Service and occupational health checks. This would disproportionately affect disabled students, as there will be little time to consider necessary and reasonable adjustments, and those with caring responsibilities who need time to put the appropriate arrangements in place.

We note that there is a risk in any new system that “informal” offer making and assurances to students outside UCAS, which already take place according to anecdotal evidence, are likely to grow. Some universities may choose to opt out of the UCAS system altogether. We propose that all applications for Home UG students should be required to go through UCAS if a PQA model is adopted.

Universities will be unable to forecast student numbers until a month before courses are due to begin.

Postponing offers until after results are known would put increased pressure on applicants at the time that they take their exams, because they do not know whether they are likely to receive an offer from their chosen provider. Having a conditional offer in place has a “motivational effect” for students (this is one of the reasons that the government has given for opposing unconditional offers). This is enhanced where the offer is from a chosen university, where a relationship has been built up over time through events and communications, accommodation is booked, conversations have been held about student support, and the student has had the opportunity to link up with other offer holders, consider their extra-curricular activities and visualise their next steps. Post qualification admissions reduces this motivation. Students will not know exactly what they need to achieve. While the motivation to do well remains, it is more general and less focussed.

**Model 2: 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.*

Schools, colleges and universities will be able to support applicants when making their applications under this model as the application process will remain relatively unchanged. However, applicants will not receive offers until August therefore increased support for applicants in making the right choices when considering which offer to accept would be required, at a time when school/college staff are likely to be unavailable.

**Model 2: 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?**

The university has a responsibility to ensure that applicants with a disability, mental health issue or other special need will be able to participate in core activities effectively and safely, both in terms of their own health and safety and that of others. Delaying offer making and acceptance would impact the ability to carefully consider these factors and put arrangements in place before the start of term which may be detrimental to vulnerable students.

Earlier identification of this provision is considered to be to the benefit of the offer-holders/students. Where it is only identified shortly before or even after a student starts a course that they may be unable to complete mandatory requirements, this results in an added disadvantage to the student (on top of the possible need to withdraw from the course), as there will be fewer alternative options open to them for that academic year and they are likely to have already made financial commitments such as for accommodation. Where it is concluded that an individual is able to complete mandatory course requirements with reasonable adjustments in place, but those adjustments are significant/complex, late identification of the student's support needs are likely to result in a delay in putting the appropriate support in place which is likely to prejudice their experience of and performance on their chosen course which might have been avoided if support was discussed at an earlier stage.

**Model 2: 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)**

Students will need some information about what grades they may achieve to inform which universities they choose to apply to. However they are calculated, this is likely to take the form of predicted grades in some form. We agree that there are challenges with predicted grades as they are currently implemented but we believe that the 2021 approach to teacher assessed grades may inform a better system for predicting grades in future.

Students would require support from schools and colleges with their choices during a period when teaching staff may be unavailable and when advice would need to be provided in a very compressed period of time to a large number of students.

We believe that in this scenario, there would need to be clear deadlines and rules about offer making to ensure maximum fairness and not "first come, first served" - universities should be required to use a gathered field approach. However, the challenge with this is that there are likely to be some students who are not placed in a first round, so that a version of "clearing" is required. These students will have even less time than now to make their choices and will be at an even greater disadvantage than clearing students are now in terms of choices and accommodation.

**Model 2: 5. 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?**

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Not sure
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### **If yes, what implications and why?**

We believe that for highly selective universities there will be an incentive in this new system to make “informal” offers or to introduce additional hurdles such as entrance examinations in order to manage demand and to be in a better position to make offers when the results are known, and this will have a particular impact on disadvantaged students as we have described above.

We propose that all applications for Home UG students should be required to go through UCAS if a PQA model is adopted.

### **Model 2: 6. Should there still be limits on how many courses they can apply to?**

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Not sure
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### **If yes, what limits and why?**

The choice limit set by UCAS is currently five (six if they apply through the UCAS Extra system). A limit on the number of courses an applicant can apply to allows universities to forecast the number of students they are likely to recruit, therefore the removal of this limit would negatively impact the ability to manage student numbers.

Removing the limit would potentially make the admissions process unmanageable for universities, in an already reduced time frame, if as a result they receive far more applications than they do now.

### **Model 2: 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.**

Apart from concerns about the processing of offers, there are much wider implications of these changes which will have an impact on student experience and student support as well as admissions.

The university has a responsibility to ensure that applicants with a disability, mental health issue or other special need will be able to participate in core activities effectively and safely, both in terms of their own health and safety and that of others. A reduced timeframe would impact the ability to carefully consider these factors and put arrangements in place before the start of term which may be detrimental to vulnerable students.

We believe that in this scenario, there would need to be clear deadlines and rules about offer making to ensure maximum fairness and not “first come, first served” - universities should be required to use a gathered field approach. However, the challenge with this is that there are likely to be some students who are not placed in a first round, so that a version of “clearing” is required. These students will have even less time than now to make their choices and will be at an even greater disadvantage than clearing students are now in terms of choices and accommodation.

In particular it is not clear how long a window there will be to issue offers (how long after results day will students have to make choices, how long will universities have to make decisions, what will the clearing process be for unplaced students?).

A significant amount of additional resource would be required. This model would mean that there would be an increased focus on grades only, and there would be less time for a consideration of wider potential.

We support the UCAS proposal to allow information sharing before results day, so that Interviews can take place ahead of results as now. This enables the university to allocate sufficient time to each applicant for their interview and enables the applicant to receive their offer early enough to choose which university they would like to attend and make necessary preparations for joining higher education. If this cannot start until the end of July, the amount of time required to undertake each interview would need to be reduced. Instead of face-to-face, interviews could be conducted via video conference or telephone but even with this change it would be difficult to complete the process within the timeframe. These types of selection method can be valuable for considering student potential in context to exam grades, so constricting the time available for this activity would have a detrimental impact on widening participation.

There is a specific concern for those programmes with integrated placements, such as healthcare programmes. In this model, the timeframe will make it very difficult to make arrangements for placements with Trusts. This

has particular implications for mature students, those with disabilities and those with caring responsibilities, who need to consider travel and living arrangements. Placements are often not close to the campus.

Universities will be unable to forecast student numbers until a month before courses are due to begin and it will be difficult to administer this process in such a short time scale. There are implications for staffing at universities at a time when staff are usually very busy preparing for the new academic year.

#### **Model 2: 8. Please provide your views on how additional entry tests, auditions and interviews could be accommodated under this model.**

Universities would need to have access to the applicant's qualifications, personal statement, references and contextual data in order to shortlist applications for interview.

We support the UCAS proposal to allow information sharing before results day, so that Interviews can take place ahead of results as now. This enables the university to allocate sufficient time to each applicant for their interview and enables the applicant to receive their offer early enough to choose which university they would like to attend and make necessary preparations for joining higher education. If this cannot start until the end of July, the amount of time required to undertake each interview would need to be reduced. Instead of face-to-face, interviews could be conducted via video conference or telephone but even with this change it would be difficult to complete the process within the timeframe. These types of selection method can be valuable for considering student potential in context to exam grades, so constricting the time available for this activity would have a detrimental impact on widening participation.

There is a specific concern for those programmes with integrated placements, such as healthcare programmes. In this model, the timeframe will make it very difficult to make arrangements for placements with Trusts. This has particular implications for mature students, those with disabilities and those with caring responsibilities, who need to consider travel and living arrangements. Placements are often not close to the campus.

#### **Model 2: 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?**

It is not clear how students would have the information they require to inform their applications – we believe that this is likely to take the form of some form of predicted grades. In that case the advantage to this system from the current one is very limited, as students may still limit their applications according to under-predictions. More of these students may receive offers from highly selective universities – but only if they apply. If grades are over-predicted, students may not receive any offers from their chosen universities and have to go through a shorter “clearing” process than now. For students applying to less selective courses, there is no benefit for the student in this change.

We agree that there are challenges with predicted grades as they are currently implemented but we believe that the 2021 approach to teacher assessed grades may inform a better system for predicting grades in future.

#### **Model 2: 10. Please provide your views on any additional implications under this model for students, higher education providers and courses not already covered above.**

We believe that this model would have serious negative implications for applicants in terms of their choices, and their outcomes, with potential for particularly negative impact on disadvantaged and under-represented groups, as we have set out above.

### **Further Questions**

#### **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**

Staff resource is currently spread across the application year and is increased during periods of high application rates, such as the period prior to the undergraduate application deadline and Clearing. Staff resource would need to be carefully reviewed and reallocated to accommodate a radically different application and/or offer timeline.

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

<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> Not sure
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**Please provide a reason for your answer.**

Applicants need to be able to provide information about themselves that isn't restricted by set fields on the application form. However, sometimes it is difficult for universities to glean the information they need from long pieces of text and some applicants find it difficult to know what universities are looking for.

The assessment of a personal statement is subjective which can result in inconsistent decision-making and varying interpretation. Universities must ensure that where a personal statement is used to assess an applicant's potential, clear assessment criteria are provided upfront.

Students from under-represented backgrounds may also have less opportunity to participate in the sort of extra-curricular activities that are often reflected in these statements, or to have engaged more widely with the area of interest outside a school setting in order to provide content for the statement. There are differing levels of support for applicants from other stakeholders (parents, school, etc.) leading to a variance in quality of personal statements received which may not accurately reflect the potential of the applicant.

The personal statement is one way to assess motivation, but it is risky to use it to assess skills or aptitude. We would welcome better guidance for applicants on the personal statement so that it provides an opportunity to assess motivation and potential rather than the previous experience and social capital of the student.

Although it would add to the burden for applicants, students should have the opportunity to provide different personal statements for each application – students do apply for different programmes at different universities and if personal statements are to assess motivation, this is more difficult with a “one size fits all” personal statement.

An alternative option would be to set specific questions set by each university, tailored to each course, that would allow applicants to focus their answers and universities would be more likely to get the information they are looking for.

## 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.

It is not clear how students would have the information they require to inform their applications – we believe that this is likely to take the form of some form of predicted grades provided by teachers even if they are not called that and are not formally submitted on the UCAS form. In that case the advantage to this system from the current one is very limited, as students may still limit their applications according to under-predictions or apply to universities based on over-predictions and then not receive offers.

We agree that there are challenges with predicted grades as they are currently implemented but we believe that the 2021 approach to teacher assessed grades may inform a better system for predicting grades in future.

We propose that while predicted grades are likely to continue to exist, they should not be shared with universities as part of the early information about the applicant.

## 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?*

We do not believe that international students should be 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.**

Part-time applicants and (most) postgraduate applicants apply directly to universities outside of the UCAS system. It would be beneficial to applicants and the sector if part-time and postgraduate applicants applied through UCAS in the same way that undergraduate full-time applicants do as they would have access to the same services as their counterparts and would not be required to submit multiple applications as they do now. It would also allow universities to better plan student numbers, as applicants would only be able to accept one offer. This should not apply to international students.

We believe that it should be mandatory for Home UG students to apply through UCAS.

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

Rather than significantly overhaul the entire admissions process to tackle unreliable predicted grades and unconditional offer making, a more practical solution may be to review how predicted grades are used within the admissions process.

We believe that the current system works well for most students, and that the issues identified by the government have most application to the small proportion of highly selective universities and courses which disadvantaged students find it harder to access; we suggest that there are simpler ways of addressing this. Both the proposals set out in this consultation introduce an extreme degree of uncertainty for all applicants.

We have suggested removing predicted grades and pre-qualification unconditional offers from the admissions system but otherwise leaving the current arrangements in place.

These PQ proposals remove the specific motivation of a conditional offer for their carefully chosen university and add a significant burden on them in finalising a choice and making practical arrangements in a short time frame. We believe that these changes have a more serious impact for disadvantaged and under-represented groups.

These arrangements do not help mature students. As they have qualifications already, they should be able to receive unconditional offers earlier in the year based on their previous qualifications.

**Please provide any representations and/or evidence on the potential impact of our proposals on people with protected characteristics for the purposes of the Public Sector Equality Duty (Equality Act 2010).**

These changes all have the effect of forcing students to make practical arrangements for their course, such as living arrangements, accommodation, caring and travel arrangements, much later in the process. Students with particular needs linked to disability, caring responsibilities or wellbeing concerns may find it harder to find accommodation that suits their needs in a short timeframe and there will be no time to “shop around”.

The university has a responsibility to ensure that applicants with a disability, mental health issue or other special need will be able to participate in core activities effectively and safely, both in terms of their own health and safety and that of others. A reduced timeframe would impact the ability to carefully consider these factors and put arrangements in place before the start of term which may be detrimental to vulnerable students.

Earlier identification of this provision is considered to be to the benefit of the offer-holders/students. Where it is only identified shortly before or even after a student starts a course that they may be unable to complete mandatory requirements, this results in an added disadvantage to the student (on top of the possible need to withdraw from the course), as there will be fewer alternative options open to them for that academic year and they are likely to have already made financial commitments such as for accommodation. Where it is concluded that an individual is able to complete mandatory course requirements with reasonable adjustments in place, but those adjustments are significant/complex, late identification of the student’s support needs are likely to result in a delay in putting the appropriate support in place which is likely to prejudice their experience of and performance on their chosen course which might have been avoided if support was discussed at an earlier stage.

## Additional questions

**How significant do you think the costs associated with familiarising HE admissions staff (e.g. training, providing and reading guidance), could be?**

Did not respond

**Are you able to provide estimates of the costs incurred processing and responding to student applications? Please also see questions a), b) and c).**

Did not respond

**a) What factors are likely to influence these costs?**

Did not respond

**b) Are there any circumstances under which the costs of processing student applications could increase under a PQA?**

We would need additional resource over the admissions period across the university to support admissions, accommodation, student support, disclosure and barring tests, liaison with placements - this work is currently managed across the year but the new timetable would mean that it would not be possible to provide it using existing resources.

**c) How might the compression of the HE admissions timetable affect costs and what could the likely size of impact be?**

We would need additional resource over the admissions period across the university to support admissions, accommodation, student support, disclosure and barring tests, liaison with placements - this work is currently managed across the year but the new timetable would mean that it would not be possible to provide it using existing resources.

**3. Could streamlining the admissions system, through a model of PQA, lead to cost savings? Please also see questions a) and b).**

No, for the reasons given above.

**a) What factors of a PQA system could influence cost savings?**

Did not respond

**b) Are you able to provide any estimates of the potential size of these cost savings either in absolute or relative terms?**

Did not respond

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