

Post-Qualification Admissions Reform

A response from the University and College Union

May 2021

Introduction

The University and College Union (UCU) represents over 120,000 staff working in further, higher, prison and adult education across the UK. Our members include teaching and research staff as well as academic-related professional services staff.

For several years, UCU has been agitating for an overhaul of the university admissions system. This campaigning work has been motivated by a concern amongst our membership that the current admissions system – based heavily on inaccurate predicted grades¹ - is fundamentally unfair, poorly understood and lacking in transparency.

A 2015 survey of UCU members² involved in university admissions showed that seven in ten backed a complete overhaul of the way in which students apply to higher education (HE). Less than a third (32%) of respondents thought that students understood how their UCAS application would be assessed. Similarly, just 31% said they thought the UCAS process supports students to make the best application decisions according to their potential.

Since that survey was conducted, the case for PQA has only continued to grow, and recent research by UCU has demonstrated that 80% of school, college and university leaders now support reform.³

Developing a student-centred model of post-qualification admissions

In mapping out a potential alternative to the current system, ensuring students are empowered to make the best possible decisions about their futures should be the key motivating factor in determining which approach to take. Too often in the past, concerns about the practical impact of changes to the admissions system have stifled ambitions for

¹ UCU, Predicted grades: accuracy and impact, 2016: https://www.ucu.org.uk/media/8409/Predicted-grades-accuracy-and-impact-Dec-16/pdf/Predicted_grades_report_Dec2016.pdf

² UCU, Undergraduate application and admission survey, 2015: https://www.ucu.org.uk/media/7330/UCU-undergraduate-application-and-admission-survey-Jun-15/pdf/ucu_undergraduateapplicationandadmissionsurvey_jun15rev1.pdf

³ UCU, HE admissions: a time for change, 2020: https://www.ucu.org.uk/media/11047/HE-admissions---time-for-change-Aug-20/pdf/ucu_he_admissions_time4change_aug20.pdf

meaningful reform. However, UCU research⁴ has demonstrated that it is possible to deliver a post-qualifications applications model that can support better choice making for students from all backgrounds, minimise additional burdens on school and college staff and maintain the ability of higher education institutions (HEIs) to admit students who fit their courses.

The student-centred model of post-qualifications applications, developed by UCU in partnership with Dr Graeme Atherton, builds on the principles outlined in this consultation but introduces a greater focus on information, advice and guidance, an 'expression of interest' point and the potential for HE institutions to start the academic year later than they do at present while avoiding the pitfalls of a significantly delayed start set out in the consultation document.

⁴ UCU, Post-qualification application: a student-centred model for higher education admissions in England, Northern Ireland and Wales, 2019: https://www.ucu.org.uk/media/10041/Post-qualification-application-a-student-centred-model-Jan-19/pdf/PQA_report_Jan19.pdf and Post-qualifications applications: how we can make it work, 2021: https://www.ucu.org.uk/media/11479/PQAs-how-we-can-make-it-work-Apr-21/pdf/UCU_PQ_applications_report_Apr21.pdf

RESPONSE TO CONSULTATION QUESTIONS

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?**

1 – highly dissatisfied

- 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.**

Yes. As outlined above UCU believes that the current admissions system is fundamentally unfair and should be significantly reformed to ensure that both applications and offers are made once students are in receipt of their level 3 examination results. Such a reform would empower students to make the best possible decisions about which institutions and courses best match their abilities and ambitions.

PQA Delivery and Implementation

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

UCU agrees that a PQA system without any change to when Level 3 results are issued would not be optimal; neither would a shift to a January start for first year HE students.

The student-centred model UCU has proposed would see Level 3 exams taken slightly earlier (after Easter) with results issued earlier in the summer and a slightly later start to the academic year for HE entrants. This would avoid the negative consequences set out in this section of the consultation while ensuring that the timetable for completing the application and offer-making process is not too compressed.

Questions for Model 1

- 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

Better than the current system

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? 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.

UCU supports a move to a model where students know their Level 3 results before they apply to HE. This would have a positive impact on students because they would be able to determine their next steps on the basis of their actual achievement rather than estimates of their potential. In particular, it would bring benefits for high-achieving students from less advantaged backgrounds, who tend to have their grades under-predicted under the current system (thereby potentially limiting their likelihood to apply to the most selective institutions)⁵.

Such a move would also have significant benefits for staff involved in university admissions by removing the pressure on teachers to have to produce predicted grades.

Much of the concern expressed about a move to post-qualification applications relates to the provision of support to students during the application and offer-making period during the summer months. UCU is clear that the provision of significantly enhanced information, advice and guidance (IAG) to students is crucial to the success of any reformed admissions system. In the proposals we have set out⁶, IAG would be front-loaded to ensure that by the time students finalise their applications and decide on offers in August/September they would have established clear preferences and have the skills to cope if their results/offers differ from expectations, thereby minimising the support required from staff.

⁵ Gill Wyness's report for UCU shows that high ability under-predicted applicants are 9% less likely to apply to top universities: https://www.ucu.org.uk/media/8409/Predicted-grades-accuracy-and-impact-Dec-16/pdf/Predicted_grades_report_Dec2016.pdf

⁶ https://www.ucu.org.uk/media/11479/PQAs-how-we-can-make-it-work-Apr-21/pdf/UCU_PQ_applications_report_Apr21.pdf

As outlined in our student-centred model, going further than the consultation model proposes and beginning L3 exams after Easter would ensure that marking periods would not be unreasonably compressed. UCU notes that any potential reform of Level 3 qualifications is out of scope for this consultation, but reforming admissions is a prime opportunity to think about how these qualifications support progression to further study.

The proposal does not consider any delay to the start of the academic year for those entering their first year of HE. However, delaying the start of the academic year by just a few weeks could have a number of potential benefits beyond ensuring that other parts of the admissions process are not too compressed. Potential benefits include:

- Allowing a closer focus on the registration of year 1 students as existing students will already be mid-way through their new term.
- Allowing academic staff to focus exclusively on enabling those in years 2 and above to start these crucial years well.
- Allowing the period from students receiving the offer to starting year 1 to be used to enhance how prepared students are for higher education study by seeing the period from mid-October as a 'pre-reading period'. All students could be given introductory reading and associated tasks they are expected to complete for when the academic year begins for year 1 students.

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.

An integral feature of UCU's proposals for a PQA model is enhancing IAG and student engagement in university admissions over a longer period. At present, we have a higher education application cycle which is little more than a set of dates where students have to complete the process of application to higher education. A higher education admissions system should be more than a cycle. It should be a set of support structures that enables students to make decisions about their higher education course and institution. It begins well before any application is made and includes preparation for as well as induction to higher education study.

UCU would therefore encourage the government to think beyond the bounds of the models set out in this consultation document to ensure that reform is more wide-ranging.

UCU's report 'PQA: how we can make it work' sets out a number of features that would help to underpin a successful model. In particular, introducing the following features into the admissions system would provide significant benefits to both students and staff:

- a national student futures week at the end of year 12 when students would focus solely on learning about future post-compulsory education options through visits to HE, sessions with students etc.
- the introduction of a 'study choice check' in September/October of Y13 - an online questionnaire for each course which allows students to explore the fit between their skills/expectations and what different courses require/offer
- an 'expression of interest point' where students would submit, via UCAS, an expression of interest to HE providers in January of their examination year. This would create a point where students can refine their choices, and higher education providers can understand the potential level of demand for their courses.

We recognise that these features would require additional investment but this would be a chance to address long-standing concerns about the quality and extent of IAG available to young people – an issue which was highlighted in the Augar review.

Many staff in schools, colleges and universities already spend significant time in the summer period supporting students upon receipt of their results, and UCU's model of front-loaded IAG would help to avoid creating additional workload for staff in FE and HE during this period. It is, however, crucial that in implementing any reform, institutions make a realistic assessment of any workload implications, and provide comprehensive support to staff in order to smooth transition between systems.

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?

Evidence from the Higher Education Policy Institute/Advance HE Student Academic Experience Survey in 2020 suggests that over a third (36%) of students are not happy with their choice of course and university. An even higher proportion of Black (55%) and

disabled (40%) students and those who enter via clearing are unhappy with their choices. Notably, over half of Black students and nearly half of those who enter via clearing are unhappy with their choices. A move to PQA with enhanced IAG would help to better ensure that students are empowered to choose which courses best suit their needs, abilities and aspirations.

PQA would also remove the need for predicted grades which disadvantage high-attaining students from less advantaged backgrounds.

UCU believes that a shift to a student-centred PQA model would also bring mental health benefits. Anecdotally our members have talked about the anguish and stress faced by students who have invested their emotional energy into their application to a particular institution but then miss out on the grades and are entering into the Clearing process. By shifting the application phase until after L3 results this unnecessary stress can be avoided.

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

UCU's latest report sets out a number of potential options to allow institutions to accommodate additional entry tests, auditions and interviews under PQA, as follows:

- Deliver interviews/auditions using present methods and approaches in the application and decision-making phase after examination results are published
- Deliver different forms of interview/audition in application and decision-making phase
- Stop doing interviews/auditions and rely on the information provided via personal statement, examination grades and reference
- All students who express an interest are asked for interview/audition
- Introduce admission testing to replace interviews
- Introduce admission testing to allow filtering and interviews/auditions to be delivered in the supporting choice phase before examination results are published

We are also clear that this activity does not always have to be undertaken after formal applications have been made. Institutions are autonomous and should therefore be free to choose which options work best for them.

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?

No.

7. Should there still be limits on how many courses they can apply to? Yes No Not sure If yes, what limits and why?

Yes. UCU believes that a move to PQA could allow for significant efficiencies within the overall application system. Currently, given that the majority of students go to their first choice, a lot of work is done applying and making offers which don't lead to students entering that course. Therefore there may be merit in reducing the number of applications to three under a PQA model, as the chances of applying to a course

To further minimise the need for some form of clearing, a further option to consider is for students to be asked to make three applications but have in reserve two additional choices where information is held by UCAS rather than passed to providers. Matching could then be attempted centrally with HEIs informing UCAS of available places.

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.

N/A

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

As outlined above, UCU is supportive of a move to post-qualification admissions, and Model 1 is in our view the preferred option of those presented within this consultation. However, we believe that Model 1 could be further improved upon by considering changes to the timing of L3 exams and entry to the first year of HE set out on page 11 of UCU's latest report⁷ - as well as, crucially, the explicit addition of significant structured IAG to support choice-making amongst students.

Questions for Model 2

⁷ https://www.ucu.org.uk/media/11479/PQAs-how-we-can-make-it-work-Apr-21/pdf/UCU_PQ_applications_report_Apr21.pdf

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**

Worse than the current 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.**

UCU is concerned that Model 2 would not address the fundamental unfairness and lack of transparency in the current admissions system which has been the key driver for reform. As with the current system, it would mean that students are being asked to make major decisions about their futures in the absence of a key source of information.

Although the consultation document suggests that students may not be provided with predicted grades to apply to HE with, UCU believes the reality would be that teacher predictions would still have too much of a role in guiding students' decision-making in the absence of L3 results to inform this. If neither predicted nor actual grades are available, this could also create a significant challenge for HE admissions staff in understanding students' academic potential so thought would be needed to ensure some consistency in how this would be assessed.

- 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?**

UCU's push for admissions reform has been driven by the pursuit of a fairer, more transparent, more accessible system.

In asking students to make final decisions about which institutions to apply to in the absence of key information, UCU believes that PQO would fail to represent any significant improvement on the current system. Therefore the various forms of disadvantage baked into the current system would not be addressed.

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).

While they might not be presented as predicted grades, the use of ongoing assessment and mock exam grades in this context would amount to an effective continuation of the use of teacher predictions to inform HE admissions. Although school and college teachers have a vital role to play in guiding student choice-making, it should not extend to making predictions on final outcomes which then have a binding impact on student choices. The use of prior attainment, while potentially useful in combination with L3 results, should not be given undue prominence as many students make rapid progress during L3 and would be disadvantaged if this were not properly factored in to the choice-making process.

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? Yes No Not sure If yes, what implications and why?

No. UCU is concerned that the PQO model would retain the Clearing process for students whose actual L3 grades do not match the predictions of their potential and/or the requirements of their chosen courses. This process places significant pressure on students to make snap decisions about their future – a feature of the system which the student-centred admissions model proposed by UCU would seek to avoid.

6. Should there still be limits on how many courses they can apply to? Yes No Not sure If yes, what limits and why?

Yes. The processing of student applications requires significant resource at HEIs and removing limits could lead to a major increase in workload for HE staff in dealing with additional applications, with no clear benefit to students.

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.

N/A

8. 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.

See answer 5 in previous section.

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?

As outlined above (see answer 3 in previous section), UCU believes that significant, structured IAG needs to be central to any reform of university admissions and that this should be available over an extended period to ensure students' choice-making is properly supported.

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

UCU does not believe a PQO model would represent the bold reform of university admissions that is required to serve the best interests of students.

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.

It is important that the government considers the needs of education staff in delivering any reform of university admissions. UCU is also clear that FE and HE staff will require support to navigate a new system. In HE, this will include academic staff as well as academic-related professional services staff who often have a central role to play in outreach and student support.

Institutions will need time to plan for change and further consultation will be required locally and nationally to inform approaches to some aspects of the admissions system (e.g. use of interviews). It is crucial that frontline staff are able to inform decision-making in these areas and plans for implementation.

2. Should personal statements be removed from the application process? Yes No Not sure

Feedback from UCU members on the topic of personal statements is mixed. In our 2015 survey, just over half (52.19%) of respondents agreed or agreed strongly that the personal statement is a useful tool for distinguishing between students. However, a small majority of respondents (51.96%) disagreed or disagreed strongly with the argument that the personal statement is a fair way for students to demonstrate their competence. Two fifths (39.00%) of respondents agree or agree strongly.

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.

Research by Gill Wyness for UCU⁸ has shown that predicted grades are highly inaccurate, so a shift away from reliance on these is a centrally important aspect of admissions reform. Teachers have an important role to play in supporting choice-making but this should not be focussed towards providing grade estimates.

It is important that the removal of predicted grades is not simply replaced by other teacher-assessed estimates of potential to inform choice-making– this is the major risk with a PQO system as students would still have to make final decisions about where to apply before they are in receipt of their L3 results.

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?

UCU agrees that maintaining flexibility in how applications from international students are assessed is desirable.

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.

UCU is deeply concerned about the fall in mature and part-time student numbers in recent years. Although admissions reform is

⁸ https://www.ucu.org.uk/media/8409/Predicted-grades-accuracy-and-impact-Dec-16/pdf/Predicted_grades_report_Dec2016.pdf

focussed primarily on school leavers who wish to become full-time undergraduates, the introduction of enhanced IAG as proposed in the student-centred model would also be a useful lever for reviewing the support on offer for non-UCAS applicants. In particular, the expression of interest phase could be something which could benefit all types of student.

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

Overall, UCU welcomes the government's recognition of the need for reform of university admissions. We are clear that reform needs to be bold and wide-ranging in order to have the desired impact of addressing the inequalities and opacity of the current system. Both the models presented in the consultation document fall short of this but the PQA model is the better of the two. Better still, though, would be a move to a truly student-centred model, as championed by UCU, which embeds extensive, structured IAG to support positive choice-making.

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).

Nearly half of all students who enter HE via clearing or who are from a Black and minority ethnic (BAME) background are unhappy with their choice of course or institution – this rises to 55% amongst Black students. Similarly, 40% of disabled students are unhappy with their choices (compared to 36% of all HE students).

These higher levels of dissatisfaction with course choice amongst these groups is unacceptable and shows that reform of how students make HE choices is required.