



## Universities UK response to the Department for Education's consultation on Post-Qualifications Admissions

April 2021

### 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?

No response

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?

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

Yes/No

In 2020, Universities UK (UUK) published the recommendations and findings of the [Fair Admissions Review](#), an 18-month review which involved in-depth analysis of data and wide-ranging consultation and polling, concluded by school, college, university and UCAS leaders. In line with the Fair Admissions Review's recommendations, we believe that a form of Post

Qualifications Offers (PQO) has the potential to increase fairness for students while still ensuring universities can continue to deliver an efficient and effective admissions process. However, a number of 'tests' would need to be satisfied in order for such a system reform to ultimately improve admissions. These are set out later in this consultation response under Model 2.

The Fair Admissions Review reached similar conclusions to the Department for Education (DfE) on the need for the system to become more transparent, rely less on predicted grades and cultivate a stronger admissions system whereby the substantial progress already made on widening access continues to grow. Indeed, the (weighted) polling of students and recent graduates carried out for this review highlighted that more than half (56%) feel that universities and colleges should only make offers after people have received their academic results. Furthermore, the review found that 60% of BAME applicants and 63% of those first in their immediate family to apply for university agree that offers should be made after receiving academic results.

The form of PQO recommended by the Fair Admissions Review offers a workable, implementable PQA system that would enhance transparency and fairness for applicants. While it shares many similarities with the form of PQO proposed by DfE, there are some important features of the model supported by UUK which do not feature in the government's proposal. Importantly, a PQO system must enable early sight of applications to allow providers to undertake any necessary interviews, tests and auditions before either rejecting an applicant or internally recording the findings of the initial assessment. Furthermore, it helps providers to manage numbers. This promotes applicant choice throughout the cycle as an individual could either replace a rejected application or swap an outstanding choice.

## PQA Delivery and Implementation

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.**

UUK agrees with the decision that November/January start dates should be ruled out. Shifting the start of the academic year to as late as January could have implications for the UK higher education sector's international competitiveness, with strong implications for the recruitment of international students. Furthermore, it will further disadvantage certain home students

who would have a period of up to three months without access to vital information, advice and guidance (IAG), and possibly income. Both issues concurrently would not result in a fairer admissions system that supports widening access.

## Questions for Model 1

2. 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

A similar post-qualification applications model was evaluated within the UUK Fair Admissions Review and was conclusively determined to be unworkable. UUK firmly believes it would represent an unmanageable overhaul to secondary education timetabling, exam sitting and exam marking, and possibly result in later starts for higher education courses. Furthermore, there are concerns about the level of disruption a 'post-qualifications applications' model would have at a time when education has been severely disrupted by the Covid-19 pandemic. The following points outline the main reasons why UUK believes the proposed Model 1 would not represent an improvement on the current system:

- The compressed six-week timeframe is an unacceptably small window for universities and students to undertake fundamental components of the admissions process including:
  - processing applications, accepting offers and registering students;
  - applying for student finance and other funding sources like Disabled Students' Allowance' (DSA), and
  - carrying out DBS checks, health assessments, interviews and compliance checks, particularly for PRSB-accredited courses.

- The compressed timeframe would also potentially disrupt universities' progress in promoting social mobility and improving opportunities for the most disadvantaged in society. This is because:
  - a compressed timeframe for admissions decision-making would place additional pressure on universities as they make complex decisions that should promote access for disadvantaged and underrepresented groups of applicants;
  - a delay in the start of the academic year could leave disadvantaged students, in particular, without access to high-quality IAG during a critical phase of the application process over the summer/autumn, and
  - it would risk restricting the opportunities that exist currently for relationship building between institutions and students, a vital part of the admissions process, particularly for disadvantaged students. This includes the delivery of open days, offer days and summer schools, the latter of which have been evidenced as empowering disadvantaged students to make more aspirational choices ([TASO](#), 2021).
- The Model proposed would result in a drastic increase in the workload of university and school/college staff over the summer when school and college staff do not traditionally work.
- Delaying the start of the academic year would also have strong implications for the UK university sector's international competitiveness compared to other sought-after destinations among international applicants.

3. 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?

Level 3 results day being brought forward to the end of July, although slightly increasing time to process applications, would be insufficient a move to overcome the additional challenges universities would face if this model were to be implemented. It would require substantial shifts in exam timetables, exam marking and the university application process. A compressed amount of teaching time for students at Level 3 would also have implications for course curriculum coverage to fit this timetable change.

The effect of moving exams forward would not solve the fundamental challenge around who will provide IAG to applicants during this period, particularly those applicants who are most dependent on IAG from school/college teachers and advisers. If this were to be facilitated, teachers would need support to implement structured and targeted IAG prior to students sitting exams. External bodies would need support in implementing application support during school holidays.

Finally, UUK believes the impact on certain disadvantaged groups of students which this consultation is seeking to empower, could be extensive. Choosing to obtain a higher education qualification should be an aspirational exercise. It is concerning that students would need to make life changing decisions with possibly reduced IAG compared to what exists at present, and within a small two-month window. Coupled with the reality that many would have just finished a stressful exam period adding additional pressure to a particularly difficult time.

4. 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.

IAG will be needed at a time when teachers/advisers are unavailable. UUK believes that, if any system reform is taken forward, it is imperative that students receive structured, targeted and improved IAG than what is currently provided. However, under this model, additional support - in the forms of research and completing applications, deciding which offers to accept - would need to be provided in advance of applications. IAG would also need to cover the period after applications are submitted. For example, if an applicant is rejected, they will need impartial guidance about what to do next. UUK does not believe that this model would be able to incorporate a less overwhelming admissions process.

Support for applicants would therefore need to be protected or enhanced, acknowledging that:

- The most recent [UCAS](#) (2021) release showed that 60% of applicants take over three months just to make decisions about which universities to apply to. Within this, disadvantaged students were reported to take less than three months to make these decisions and could benefit from a more targeted and structured approach to IAG to help them make more aspirational choices.
- Support from schools would need to be available during the summer period, given that some disadvantaged students will not have access to alternative sources of IAG. Even allowing for a greater reliance on digital resources for IAG could have a disproportionate impact because these resources can be heavily fragmented ([Careers and Enterprise](#), 2016) and disadvantage those who experience digital poverty.
- University open days and summer schools are key mechanisms in fostering relationships with applicants, particularly those from disadvantaged backgrounds, but their part in the admissions process would be subject to great uncertainty under this model. Evidence has shown that higher education progression is 5-14 percentage points higher for those who attend summer schools. The application process therefore is not a stagnant period and these relationships are crucial for students to gain an insight and understanding of what attending a university is like. With such a compressed

application window and a lack of certainty around whether a student is likely to become an applicant it fractures these connections.

5. 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 foremost factor that will have an effect on disadvantaged groups is the provision of IAG during the application window, as set out above. But there are further consequences this model could have on disadvantaged and underrepresented groups including, but not limited to:

- Delayed DSA payments for disabled students. For students with disabilities, applying for DSA is a crucial part of the application process as it builds a relationship with the university and clarifies what support, such as reasonable adjustments, will be available to them during their time at university. [DSA](#) can take up to six weeks to process an application and therefore the stipulated model timeframe risks students starting term without essential support.
- Increased pressure for students who may be overwhelmed by the short window within which they would need to make several critical decisions. These include applying for student finance and accommodation, coupled with a lack of support from schools, ultimately adding additional time pressures to making decisions and potentially risking the mental wellbeing of students before attending university.
- Increased barriers for universities' delivery of outreach. With schools closed for much of the summer it remains unclear how students and universities could schedule useful and personalised outreach opportunities. Further to an earlier point made about summer schools, outreach activities, such as mentoring, can play a formative role in making aspirational application choices. For example, [Brightside](#) (2020) found



that 77% of POLAR4 Quintile 1 and 2 (students from the lowest participation groups) who undertook online mentoring progressed to higher education compared to the national average of 24%.

- Increased barriers for students to build a relationship with a university. This can help foster a real sense of belonging and can help ensure a smooth transition into higher education. Linked to this, [HEAT](#) (2020) found that students are more likely to attend university if they attend on campus events, and that this is especially pronounced for socio-economically disadvantaged groups. It is challenging to envision how these events could be sufficiently delivered in a six-week period over the summer holidays.

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

As expressed elsewhere, UUK believes that with such a compressed timetable it is not feasible to additionally carry out entry tests, auditions, and interviews under this model. As autonomous institutions, universities have varying admissions practices. For example, in some institutions all applicants are interviewed. Similarly, the pressures of this will also differ according to course choices, whether that be the importance of a portfolio on creative courses or interviews for medical courses. A compressed timetable for this would not increase fairness for students. Furthermore, students would most likely seek IAG from their schools and colleges on this type of process and it is important they can do so. Schools being closed over the summer could isolate students during the crucial application window.

7. 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?

Many applicants already apply to, and enter, university via a non-traditional route, such as mature students and a proportion of international undergraduate applicants, who apply directly to a university. For example, [UCAS](#) (2021) End of Cycle Data for 2019 demonstrates that over 107,440 mature undergraduates were placed on a course. Whilst, [HESA](#) (2021) data shows that there were 162,710 full time mature first-year undergraduate students in 2019/20. [HESA](#) (2021) also states that in 2019/20 there were also 109,260 part time mature-first year undergraduate students. It is important to protect direct entry at least for those universities with an established and long-standing policy of doing so.

Variations of this kind occur across the system with applicants who also apply at different times such as after the current January UCAS deadline. Certain courses may also have several intakes throughout the year such as Nursing which also impacts when qualified nurses join the work force. Therefore, there are a number of risks his model would pose for the ways in which students currently apply. Concerns have been raised that it will place those who already have their grades at an advantage as they try to apply directly to the university and therefore may avoid applying through UCAS.

There are many benefits of having a shared admissions service that is UK-wide, which allows for students to apply across devolved nations, allows students to access clear and consistent guidance throughout the application process, and which encourages the sharing of effective practice between universities. This must be retained.

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

Yes/No/Not sure. If yes, what limits and why?

In order for universities to be able to continue to provide an efficient and effective admissions process, it is vital that a reform does not result in a large number of institutions becoming overwhelmed with applications. This would present a significant challenge under this model, given the 6-week window proposed and therefore a limit on how many courses applicants can apply to, would certainly need to be in place.

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

This will vary greatly by institutions and differing courses but our members have advised it could be much longer for the most selective courses and others which will require interviews, auditions, or tests.

Practically, institutions cannot begin checks such as DBS or health checks until applicants have accepted an offer. This greatly impacts PSRB-accredited courses including the key worker courses such as nursing which have, over the pandemic, seen a distinct increase in applications. With offers potentially not being accepted until towards the end of the compressed timeline, it again further squeezes integral processes that should not be inappropriately accelerated.

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

Attending university is greater than the sum of being accepted onto a course. Students will need to secure accommodation, student finance and in some cases apply for further scholarships. Accommodation places may be limited at certain universities and therefore it is imperative that students know in advance whether they have received a place. Accommodation can greatly differ on the cost, location and facilities available. Students, particularly those from disadvantaged groups, will need to make appropriate arrangements in advance of arriving at university to begin their course. The Model 1 proposed does not provide a workable facilitation of these essential parts of the admissions system.

**Model 2: 'Pre-qualification applications with post-qualification offers and decisions'**

11. 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 response was provided to the above ranking.

UUK considers Model 2 (Post Qualification Offers) to be preferable to Model 1, but it would require some fundamental adjustments to truly improve fairness and transparency for students. The Fair Admissions Review identified a model of post-qualification offers that has the potential to be workable. The Review's PQO model has several differences to the DfE proposed Model 2 which could ultimately improve fairness for students and should form part of any consideration of PQO. This includes:

- Allowing for the release of a certain amount of applicant information to universities early in the process which would permit for the scheduling of interviews or selection tests.
- Allowing universities to make early rejections where it is deemed necessary and where clearly in the student's interest.
- Retaining the relationships that build between applicants and universities ahead of enrolment.

UUK unequivocally opposes the DfE proposal of a third-party holding applications until results day. Such a process greatly increases the risks associated with an increased period of uncertainty and anxiety particularly for widening participation students. Without these additional allowances, Model 2 as proposed would be worse than the current system as it potentially leaves both students and universities in the dark for a considerable amount of time without the ability to carry out crucial practices that would ultimately make it a fairer system. The UUK Fair Admissions review's student polling identified that while 64% think it is fine to apply to university or college with predicted grades, a majority would prefer offers to be made post results. This review explored whether a change to the admissions system could address these concerns. UUK supported a PQO model with the understanding that it would reduce the importance of predicted grades and end the need for unconditional offers. Under the proposed DfE PQA models it is imperative Model 2 should not utilise predicted grades.

A PQO model would also need to satisfy a number of tests for UUK to reasonably support its implementation and for the system to be truly fairer for all students than what exists currently. Alongside the importance of having sight of applications before results day, these include:

- Sufficient flexibility in the system to ensure that it works across all four nations and for all types of higher education provider (including specialist institutions), while protecting institutional autonomy;
- Enhanced government investment in careers advice in the form of targeted, structured information, advice and guidance (IAG) before, during and after the application process;
- Guidance on what will replace formal, predicted grades, supported by evidence on the applicability and reliability of different aspects of prior attainment;
- An approach which ensures that the system does not disadvantage mature applicants who already have their grades, as well as international students;
- Coordination with relevant bodies, including PSRBs, to safeguard timely recruitment, as well as efficient confirmation of DSA and student finance payments;
- Sufficient time in the cycle to prevent any disruption to widening access and contextual offer making strategies, and the early release of Free School Meals data to enhance these processes;
- Allowing around 5 choices for applicants in order not to limit disadvantaged student choice and levels of aspiration;

The implementation of any new model would require universities to make huge changes just as the sector emerges and recovers from the pandemic. In light of this, UUK firmly believes any reform taken forward should not come into effect until at least 2024, following further, detailed engagement and consultation across the entire education sector in the UK. It is crucial that the government's position on PQA is informed beyond the end of this consultation, and that further efforts are expanded to allow for formal discussions of how all parts of the education sector could work together in the best interest of students (across all UK nations).

12. 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.

Similar to under Model 1, applicants would need a minimum of what they already receive. Without the guiding role of predicted grades and the risk of reduced support provided around results day (such as for offer decisions) there will need to be an increased focus on providing students with the tools to make these decisions. [UCAS](#) (2021) found that 85% of students speak to their teachers about university decisions, highlighting the importance of enabling this communication between schools. Under the proposed model, it is a serious concern that students will be making these decisions without access to their teachers' advice.

The Fair Admissions Review student polling found that those who consider the application process to be unfair most commonly say this is because the career advice they were given was not very helpful (34%). The quality of careers advice can be a notable block for students when applying for university, particularly disadvantaged students. UUK recommends that PQO reform would need to be planned in harmony with an increased level of investment to support advice and guidance as early as possible. This is echoed by [UCAS](#) (2021) in their recent report 'Where Next?', which found two in five students saying that more careers IAG would have led to them making better choices. Similarly, [NEON](#) (2020) research found that over 80% of school leaders supported a minimum of 10 hours of IAG per student. In England, this would require continued government funding for FE-HE-school partnerships once the current OfS Uni Connect programme's funding comes to an end. Alongside investment in IAG services not provided through schools/colleges but through other bodies like local authorities.

Under any model, universities would continue to ensure that all applications are treated fairly. However, with the DfE's proposed lack of sight of

applications until results day, certain important mechanisms that universities use to widen access may be weakened. This includes in the area of contextual admissions. The Fair Admissions Review emphasised how contextual offers are integral to widening participation, and the pandemic has highlighted, more than ever, the inequalities in education that exist and are holding back equality of opportunity. For example, in 2018/19 in England, only 26.3% of pupils who received Free School Meals (FSM) progressed to university by the age of 19 compared to 45.1% of non-FSM students ([Department for Education, 2020](#)). Overall, the rate of progression into higher education between FSM and non-FSM pupils has remained stable in recent years, showing much more needs to be done in this area. Any reforms to admissions must facilitate and support universities' efforts to reduce these gaps further. This is why the Fair Admissions Review recommended that government provide universities with information on applicants' FSM status early on in the process, to allow for considered decisions that are intended to improve equality of opportunity.

Similarly, higher education entry rates for care experienced students are substantially lower than for those without care experience and contextual offers can form a key role in levelling up opportunity for this group. In 2017/18, only 13% of pupils in England who were looked after continuously for 12 months or more entered higher education compared with 43% of all other pupils ([OfS, 2021](#)). Widening access involves careful consideration of an individual's context – in which they gained their experience and prior attainment. Therefore, it is vital that universities have early sight of specific applicant information. Contextual 'flags' could also be useful tools for universities to give early reassurances for some applicants.

13. 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?

In the absence of predicted grades, disadvantaged students would need detailed additional support to make informed and aspirational decisions. As set out in Question 12, disadvantaged students would need more IAG from advisers about how aspirational they should be. This is particularly important



for disadvantaged students who may not have access to critical networks and information to make choices or understand the admissions process ([UUK](#) 2020, [Boliver et al.](#) 2017). Access to certain opportunities of support like summer schools could also be jeopardised under this model.

It is also important that any PQO system allows flexibility for universities to support those with specific needs, including those with disabilities or mental health issues, who might greatly benefit from early confirmation of a place at university. In recognition of this, the Fair Admissions Review ([UUK](#), 2020) recommended that unconditional offers should continue to be made under certain circumstances for groups with specific or special needs. This is an important consideration, given that adding greater uncertainty into the process could negatively affect some applicants.

Furthermore, it is important to consider the unintended consequence that less decision-making time may have on retention rates. [UCAS](#) (2021) evidence that 16% of those who apply directly through clearing drop out before their second year compared to 6% for clearing applicants and 5% for firm choice students. It is crucial that students are given the appropriate time length to consider and explore their options whilst fully supported and guided by an informed network. This model reduces the application time bringing it closer to what direct clearing applicants currently experience and therefore, again, does not solve the crucial role this consultation is trying to overcome to help those who are not lifted up by the current admissions system.

14. 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).

In the absence of predicted grades there is a need for alternative, evidence-based assessment methods used to inform teachers' advice and ultimately applicants' decision making. Teachers' role is central to providing advice to students on which courses and institutions to apply for. This should not be

changed or reduced under this model. Guidance would need to be published which outlines a consistency in approach that is accessible and easy for teachers and advisers to understand. This could include some of the methods suggested in the question, such as ongoing assessment or GCSE/N5 attainment. Although it must be factored in that an individual's performance can be related to a school's context and can improve after GCSE/N5.

Activities such as outreach activities, open days and offers day are also important methods through which students make informed choices. Universities value greatly the role of open days and summer schools to foster relationships with applicants, specifically disadvantaged and underrepresented groups of students. There should be further thought about how these can remain in place under this model. Much like the concern with Model 1, Model 2 exacerbates a lack of certainty around whether a student is likely to become an applicant or be made an offer. With the holding of applications by a third party, which UUK opposes, it fractures the ability to create similar opportunities.

15. 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?

As stated in Model 1, Question 9, many applicants already apply to, and enter, through non-traditional routes. There are numerous benefits of a UK-wide shared admissions service which must be retained. This includes applicants' ability to apply across different UK nations, for effective practice to be shared between universities, and for applicants to access clear and consistent guidance throughout the process. For example, The Fair Admissions Review polling found that two in five (38%) recent applicants say UCAS was within their top three most-used sources of support or guidance during the application process. The consequences may lead to a greater number directly applying to higher education providers. Sight of applications, in line with the Fair Admissions PQO model, and therefore allowing for firm rejections early

would prevent this, working in the interests of student choice by allowing them to seek an alternative university. However, it could also result in more students going through clearing or an equivalent part of the admissions process. This would have implications for universities' ability to forecast and plan, and would lead to a possible increase in staff workload.

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

Yes/No/Not sure If yes, what limits and why?

Yes, there should still be limits on how many courses students are able to apply to, in order to prevent some universities from becoming overwhelmed with applications. In the interests of protecting student choice, UUK believes this should be similar to what is currently in place, with around 5 choices.

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

UUK has similar views on timelines for processing applications in Model 1 and 2. As already stated, UUK believes that higher education providers would need a minimum of ten weeks to process applications. This would, of course, vary greatly by institution and course but it could be as much as ten weeks in some cases.

As has been stipulated throughout our response this particularly affects PSRB-accredited course checks as institutions cannot begin these until applicants have accepted an offer.

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

Model 2, as it stands, makes it exceedingly challenging to facilitate additional entry tests, auditions and interviews. This is due to the lack of sight of applications ahead of results day and an inappropriately short window after results to process applications. Even if it could be facilitated in this period, it would provide applicants with little time for preparation for these processes including planning any appropriate travel or accommodation. UUK recommends, in line with the Fair Admissions Review, that the model incorporates the ability to allow for the rejection of applicants who are a firm 'no' early on in the process so that the student can consider other options. The model proposed by UUK and endorsed by UCAS, would accommodate time for interviews, auditions, entry tests and other key aspects of the admissions process. These are integral and holistic parts of the admissions system and safeguarding time for these activities would be in the student interest.

19. 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?

UUKs views on this question have been set out in Question 11.

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

This model may have a differential impact across the four UK nations, which must be kept in mind when considering any move to PQO. A key example here is the set of challenges such a model could create for universities and applicants in Scotland:

- It could negatively impact S6 as it may incentivise more students to leave after S5 qualifications and therefore decrease preparedness for university. There is an implication this could lead to smaller cohorts and therefore less subject choice offered. Widening access students also use both S5 and S6 for their entry qualifications and therefore PQO may disproportionately impact them.
- Universities in Scotland tend to start earlier in September and therefore the compression of any timescales will have a particular impact.

For these reasons, it is vital that any reform option being considered must not be rushed. It must also be accompanied by a clear understanding of how smaller-scale reforms and modifications to admissions could play a role in addressing some of the 'problems' as set out in the consultation document. This could include the publication of actual entry grades, improving widening access strategies through the early release of Free School meals data and greater consistency in approach to contextual admissions. And the sector self-regulating admissions behaviours through a code of practice to increase transparency and confidence. All of those are fair Admissions Recommendations.

## Further questions

21. 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.

UUK deems further consultation and engagement of utmost importance on this reform. It is crucial that the DfE is aware of *how* any PQA system would be implemented and the potential implications this may entail. Many questions currently remain unanswered in the proposed models such as how a move to such a new system may involve changes in aspects like regulation. The crux of building support from the education sector will be further forums and mechanisms to transparently discuss and consider alternatives and set out the next steps for the sector.

There are numerous important stakeholders when it comes to admissions. Therefore, the implementation of a new admissions system is not for any one organisation (including the UK government) to decide and there needs to be consensus among universities, schools, colleges, exam boards, student finance and other integrally linked bodies. It must also have student support. Reform should not be rushed, and reasonable time is needed for further consultation, meaning implementation of any PQA system would not be feasible until at least 2024 given how far in advance the higher education sector prepares for incoming cohorts. Further, the devolved nations should be fully consulted and considered as the changes will impact each nation differently.

Universities are committed to reform where it would improve outcomes for students. The sector has engaged on these topics in a variety of formats and, as the UUK Fair Admissions Review demonstrates, there are a number of intentions already planned to tackle some of the very topics this consultation seeks to address such as concerns about unconditional offers.

Most notably, the Review recommended that the higher education sector should take a more proactive approach to identifying and addressing key

admissions challenges and criticisms. This includes UUK developing a 'code of practice' comprising the review's agreed principles and recommendations, with consequences for breaches of the code. Ownership of the code is scheduled to sit with UUK (in partnership with other representative bodies, such as Guild HE and the Association of Colleges), while UCAS' terms of service could clearly state that its customers must abide by the code. This code will further support behaviour prioritising applicant choice. This should be coupled with universities and colleges monitoring and evaluating admissions data and practices, sharing good practice and identifying what works well and what does not work well in terms of serving the interests of students of all backgrounds. This will provide a forum to assess where further action is needed to uphold fairness and transparency in admissions.

In light of the above developments, it is vital that the government does not simply view PQA in isolation as a possible solution to some of the admissions-related challenges for which the university sector already has a plan in place to address.

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

Yes/**No**/Not sure Please provide a reason for your answer.

Engagement with our members highlighted the important role that personal statements can and should play in the application process, providing a holistic and contextual insight. Moreover, they provide a key opportunity for applicants to divest any extenuating circumstances experienced. They form an invaluable opportunity for mature students to express their specific motivations and circumstances. UUK acknowledges, however, that in their current state, the personal statement part of the process could be improved upon. UUK does not believe they should be removed from the application process entirely.

Research by the [Sutton Trust](#) (2016) demonstrates that personal statements in all intents and purposes can lead to a further advantage to those who are from

more advantaged educational backgrounds. Student polling carried out by UUK for the Fair Admissions Review found that 51% of applicants found writing a personal statement difficult. This rises to 57% for first in family applicants. The challenge of a personal statement also differs according to type of school attended, with 52% of non-selective state school students finding it difficult compared to 39% of those from a selective state school. These findings mirror the [Sutton Trust's](#) (2012) research which also found that writing errors were more common amongst personal statements from state schools compared to independent schools. Although UUK believes personal statements should not be removed from the application process, this evidence should be utilised to rethink and reshape the personal statement to be a much fairer tool for applicants.

UUK believes that further engagement within the education sector on this topic is needed. Specifically, engagement within the education sector is needed about how the personal statement could be better utilised as part of the application process. This should involve consideration of how the statement could be better structured, made shorter and more direct, and be accompanied by clear guidelines to acknowledge individuals' mitigating/extenuating circumstances.

23. Please provide your views on the impact of schools and colleges no longer using predicted grades to guide students in their higher education choices.

UUKs position on this is outlined in Question 13.



24. 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?

UUK agrees that the DfE are right to exclude international students from the scope of proposed PQA for a number of reasons highlighted in the consultation namely the need to be responsive to international exam timetables, the time required for visa applications to be made and resolved, as well as the potential effect on the international competitiveness of the UK as a destination market, (many international students will apply to multiple destinations and UK universities will be at a disadvantage if they are not able to offer places to students on the same timelines as at present).

It is important to recognise that, at undergraduate level, however, the majority of non-EU (60%) and EU (95%) students do apply through UCAS so, even if not included in the scope of the reform, it will be necessary to carefully consider the impact of reform on these students and how the inter-relationship between domestic and international student admissions can be effectively managed by the sector. It will also be necessary to clearly define who is classed as an "international" student, not least because some students fee status may change during the application process. Consideration needs to be given to the fact that, according to UCAS, 60% of international undergraduate applicants already have confirmed qualifications, that many international students may arrive early to help with the transition to living in the UK, and many students engage with pre-sessional English courses.

UUK believes that even a PQO model as proposed would not be suitable for the recruitment of international students and, whatever the future admissions system looks like, the university sector is best-placed to ensure that recruitment is not negatively impacted through any reform process. UUK and UUK International would be willing to lead work to explore this issue further.

25. 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.

UUK have responded to these issues in Question 9 and 17. Those who do not use the traditional UCAS route will do so for good reason and this should not be jeopardised. This includes students who are applying to a university/college with an established and longstanding route of direct applications. Even PQA risks creating a two-tier system for those who already have their grades, and those who do not. Any reform must prevent this scenario from arising.

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

In Question 22, UUK briefly set out the importance of maintaining a four nations approach when considering possible reform to the admissions system. UUK wishes to reiterate that any move to a new admissions system must be cognisant of the differential impacts and unintended consequences this may have across the devolved nations.

In Scotland there a number of concerns that must be considered as part of this consultation including:

- The negative impact a system change could have on S6 as more learners may apply for university after S5. This could undermine the role of S6 and Advanced Higher qualifications including for learner development. Advanced Highers are required by some institutions in the rest of the UK and therefore could limit the options of Scottish students.

- Start dates vary across the UK and in Scotland courses tend to start earlier than institutions elsewhere in the UK. Any proposed model must reflect the impact this will have for varying admissions timetables.
- A reformed admissions system would require changes to both the SQA certification process and to SAAS processes for arranging student support to students articulating to university from college.
- Widening access priorities are at risk. The proposals, for example, may endanger the role of summer schools for offer holders or impact mature applicants.
- Scottish universities have student number controls and therefore a proposed new system must be attentive of this.

These concerns do not just affect Scottish universities and Scottish pupils within Scotland but also students' abilities to apply across nations.

Universities Scotland's response to this consultation sets out in more detail how both models would impact the Scottish sector. Furthermore, Universities Scotland's response sets out how some of the issues that this consultation seeks to address are not an ongoing issue.

### **Public Sector Equality Duty (PSED)**

27. 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).

UUK supports admissions reform where it could address the inequalities experienced by people with protected characteristics within the current system. These impacts and concerns are clearly set out in the UUK Fair Admissions Review. Our response so far has highlighted the variety of impacts on students with disabilities. An additional point of relevance is that some students including those with disabilities can benefit from early induction. It is vital that this opportunity is protected under any reform model. and as such will not be repeated here. However, more widely, the DfE must be mindful of

the work of the Disabled Students' Commission as they develop some guiding principles for how any PQA reform option can support the disabled student's experience.

One area UUK strongly believes is needed for further consideration is the impact of the reforms on applicants of different ethnicities. The Fair Admissions Review found that White applicants are more likely to have a favourable view of the applications process. Critically, Black, Asian and Minority Ethnic applicants are significantly less likely to describe the admissions process as fair compared with White applicants (62% vs 73%). The following points evidence and further support previous points made elsewhere in this response about why the models proposed are unfit to target the individuals this consultation seeks to help. The Fair Admissions Review found that Black, Asian and Minority Ethnic students are:

- significantly more likely than White students to report experiencing a lack of help with choosing a subject (19% vs. 14%) and a lack of support from universities or institutions (13% vs. 8%) when applying to university.
- more likely to go through clearing than White applicants (18% vs. 12%).
- more likely than White students to report admissions tests as required steps in their application process (23% vs. 16%).

The above is a succinct overview of the challenges but it neatly sets out why reform must address this inequality. It is imperative a new system does not further disadvantage these groups.

The third group of concern following the implementation of the proposals is the differential impact of the proposed models on people according to their age. It is important that any admissions reform is also viewed through a lens of the mature applicant's experience, including where individuals might apply outside of UCAS. In 2020, [UCAS](#) (2021) reported a marked increase in mature students being accepted onto degree courses, with 114,400 placed which is the largest since 2009. Research by [UCAS](#) (2018) and [TASO](#) (2021) emphasises that this group of students have different expectations and needs than younger groups and there is a need for better support for mature student retention throughout their academic education. Therefore, it is in their

interest, as other students, that they can plan and have confidence in their choices ahead of term. Both models do not provide this level of certainty and would therefore disadvantage applicants in this position.