

Universities Scotland response to Department for Education's consultation on post-qualification admissions

Questions

Initial

- 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? Yes/No**

[no response]

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

In principle we are open to a change to the current admissions system, where this change promotes fairness and combats inequalities. Any new system must work for universities, but the more important issue is how it works for applicants. It should work as least as well as the current one and ideally better. It should not disadvantage any groups of applicants.

We have considerable concerns with a post-qualification applications model – this is explored further below. We do not believe a post-qualification applications model is workable for universities and we believe it would negatively impact applicants.

We note the significant work undertaken by UUK and UCAS around a post-qualification offers model. While we feel this could be workable, we do have concerns about the possible impact of this model on applicants. We also note the advantages of the UUK/UCAS PQO model over the PQA model that is proposed here. This is explored further throughout our consultation response.

The proposed reforms are largely focussed on English pupils sitting A-levels. We have significant concerns about any reforms which could undermine the Scottish education system, and in particular the role of S6 and of Advanced Higher qualifications. A post-qualification system which encouraged learners to apply to university with grades achieved at the end of S5 could impact on schools' ability to resource Advanced Higher qualifications, thereby disadvantaging Scottish students who wish to study high-demand professional subjects such as Medicine or Dentistry, or who wish to study at world-leading institutions in the rest of the UK which require Advanced Highers.

We note that international students would be out of scope of a post-qualification admissions system. However, we believe that consideration of these applicants is crucial to the consultation. Implementation of a post-qualification system has the potential to impact negatively on international recruitment and admissions. This is of significant concern and is discussed further below.

We would like to note the strengths of our current system. It is well-known, trusted, works for the majority of UK and international applicants, allows institutions to forward plan and manage student numbers, works



well across the four nations of the UK, and focuses and motivates learners with conditional offers as they approach their examinations (Marchant 2021 for HEPI). It will be important to consider whether the issues of undermatching and conditional unconditional offers which underpin this consultation can be appropriately addressed within the current system. This is revisited at the end of our response.

PQA Delivery and implementation

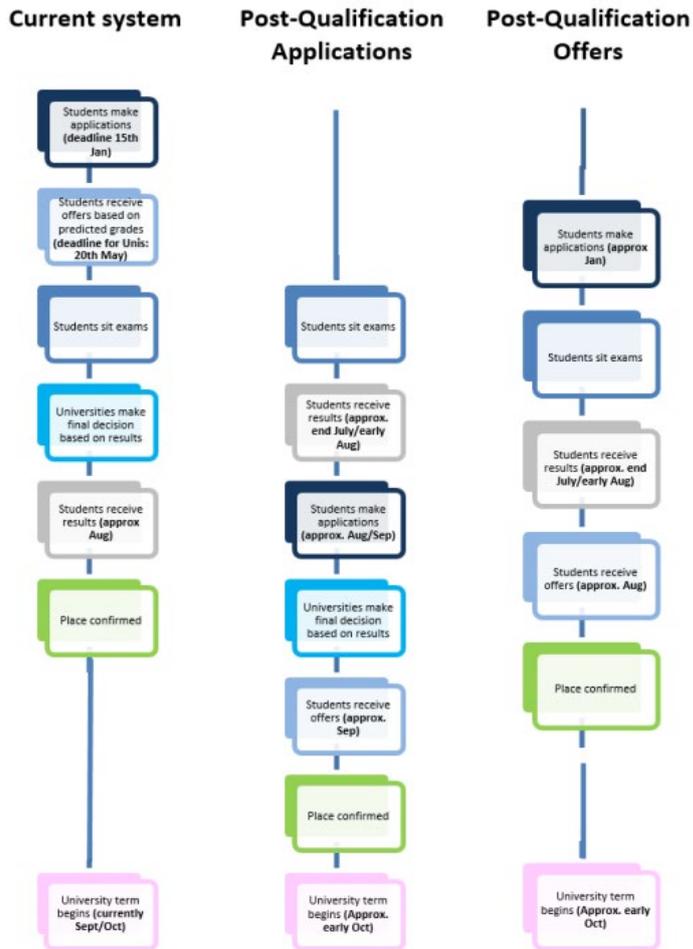
Some PQA proponents have suggested no changes to results date and HE terms starting between Nov and Jan. This has been ruled out because:

- **Gap between end of school and beginning of HE**
 - **Out of sync with European nations**
 - **Implications for where international students choose to study**
 - **Loss of fee income for institutions**
1. **If you think these issues should not rule out consideration of the model above, please explain why, providing supporting evidence where possible.**

For the reasons identified above, we would not support any model which would require university terms to start in November at the earliest.

Illustrative models for a PQA system





Model 1: post-qualification applications and offers

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.

We think that model 1, a post-qualification applications model, would be worse than the current system.

Model 1 has the potential to address some of the issues underpinning this consultation. Specifically, it reduces the role of predicted grades and removes the issue of conditional unconditional offers.

However, it would represent a potentially unmanageable overhaul to secondary education timetabling, exam sitting and exam marking, and may require a later start for higher education courses which should be avoided for the reasons identified above, including: creating a gap between end of school and beginning of HE; putting the UK out of step with other European nations; negatively impacting international student recruitment.

A post-qualification applications model such as model 1 would create a huge gap in provision of information, advice, and guidance for possible applicants, who would be making applications when schools and colleges were closed, and they were no longer students. Teachers and advisers in schools and colleges are currently a crucial source of information, advice, and guidance for applicants, and any support systems would be under



great pressure within this condensed time period. Also under pressure would be university admissions teams and IT systems in this time of peak activity.

The discrepancy of offer-making between universities and colleges could be problematic, impacting on articulation arrangements between universities and colleges. We recommend that further consideration is given to students articulating to university from college.

This would require changes to both the SQA certification process and to SAAS processes for arranging student support. Whilst we are reasonably confident that this could be achieved, we would like to be reassured on both these points before adopting a new model.

- 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?**

We are of the view that results could be brought forward to the end of July if needed.

- 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.**

We are of the view that it would not be possible to build in adequate support to applicants within the timeline proposed in Model 1 (PQA).

It is problematic that applicants would either have to research and develop their applications to the current timescale (i.e. a long time before making the application) to allow time to prepare for and sit exams or have to do so after their exams when they may have little access to support and guidance. This would particularly impact widening access learners and groups already underrepresented in higher education.

There is a risk that school-leavers would not have access to the digital devices necessary to support an online application. Schools and colleges provide both facilities and guidance in the making of online applications.

Finally, the admissions process is much more than the filling in of an online application and receiving an offer. Learners research their options, attend Open Days, build up a relationship with their future place of study, research and secure accommodation, engage in summer schools, bridging and top-up programmes, and other transition and pre-arrival activities. Peer mentoring is often a feature of this support, all of which is particularly crucial for widening access or other underrepresented groups. These activities contribute to informed decision-making and building confident and successful students. It is not at all clear that this process could be suitably accommodated within 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?

A full consultation which engages people with lived experience and representative stakeholder groups should draw out these issues. A full equality impact assessment should accompany any potential policy changes.

Any changes to the admissions system should reduce existing barriers for applicants from these groups.

The timeline for this PQA model would put a huge strain on university support services, many of which work with new students in advance of the beginning of term to ensure that appropriate support is in place.

Where there is an IAG gap for school-leaver applicants this may impact on disclosure rates for applicants with disabilities or other additional support needs. This is a significant concern that should not be underestimated.

More generally, it will be important to look at the impact on different groups of applicants including (but not limited to) students with disabilities, disadvantaged groups, mature applicants using UCAS, international students using UCAS, Scottish school-leavers (given Scotland's school qualification system and timeline).

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

It would not be possible to accommodate additional tests, auditions, and interviews within this model. Additionally, it would not be desirable to create a two-tiered model of admissions for UK applicants, with completely separate processes for applicants to programmes with additional entry tests, auditions, or interviews.

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?

This could lead to more students applying directly to higher education providers (e.g. international students, mature students, articulating students – these are students who complete a Higher National qualification at college and then move to year two or three at university to complete a degree). Model 1 is not conducive to the support which universities need to provide in order to meet Scottish Government widening access priorities. As a consequence, it is likely that more applications from these groups would also be handled directly.

Where there could be a fracturing of application processes by student group, it will be important to reflect on the implications of this for universities, and the impact on the kind of support they will be able to offer applicants throughout the admissions cycle.

7. Should there be limits on how many courses they can apply to? If yes, what limits and why?

Yes.

A limit on the number of courses applied to is necessary to support considered decision-making for students and manage planning, number controls and workload for universities. This should be no greater than the current limit of 5 courses and should possibly be fewer under a PQ model. The challenges around student



number planning would need to be balanced with the need to keep options open for students – we would not like to see students be less aspirational in their university choices if they had fewer options. In this instance, ranking choices may be necessary.

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.

This would depend on a number of different factors, including the number of courses applicants apply to. It will vary hugely across institutions and programmes, depending on the level of competition, the size and resource of admissions teams, and more. Processing offers within such a condensed timescale would require additional staffing resource for many, if not all, institutions.

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

We do not believe that a system of post-qualification applications provides a workable model for UK higher education.

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

Questions for model 2

10. 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.

We are not convinced that Model 2 would significantly improve our admissions system.

Model 2 has the benefit of reducing the importance of predicted grades. Nonetheless, it doesn’t entirely address the issue of disadvantaged students undermatching, as these students will apply with anticipated, not achieved, grades and predicting performance will be an important part the advice and guidance they receive to make an application. In Scotland, the importance of predicted grades for school-leaver applicants is less significant than elsewhere in the UK as most school-leaver apply in their final year of school (S6), having taken qualifications in S5 (Highers) and therefore most applicants will already at least partially meet entry requirements. In addition, we would have considerable concerns about any reform to admissions which significantly increased applications from S5 school pupils, thereby undermining the importance of the S6 year. This is discussed further below.

This would require changes to both the SQA certification process and to SAAS processes for arranging student support. Whilst we are reasonably confident that this could be achieved, we would like to be reassured on both these points before adopting a new model.

The condensed timetable for offer-making, applying for funding, accommodation, travel arrangements and securing additional support where needed will place significant pressure on learners and on universities. This could have the perverse impact that those applicants from underrepresented groups or with less financial support may go for a ‘safer option’, closer to home, or may otherwise limit their options.

We also wish to consider the impact of the condensed timetable on rest-of-UK students wishing to study in Scotland, as Scottish university term dates are generally earlier than the rest of the UK.

11. 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?



There is no significant impact on the support needed to submit an application as the timeline for submitting applications is similar to the current system.

There will be an increased need for advice and support in August/September when offers are made and during any Clearing process thereafter. This may place significant additional pressure on secondary schools and on universities as well as on Skills Development Scotland's careers advice services. We have concerns that applicants would not be able to access sufficient quality advice and support at this time, and that this would particularly impact widening access learners and underrepresented groups.

12. 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?

A full consultation which engages people with lived experience and representative stakeholder groups should draw out these issues. A full equality impact assessment should accompany any potential policy changes.

Any changes to the admissions system should reduce existing barriers for applicants from these groups.

The timeline for this PQA model may put a strain on university support services, many of which work with new students in advance of the beginning of term to ensure that appropriate support is in place. This is especially important for implementing adjustments for disabled applicants, in particular where there are early placements as part of the programme.

Mature applicants and students articulating from college to university may already meet entry requirements, or may have earlier knowledge of their results. It may be desirable for those applicants to know if they have an offer earlier. It would be important to engage with these groups to see if this would affect their experience or their likelihood of applying.

Students with caring responsibilities may be particularly impacted if they do not have early knowledge of their offer. This encompasses young and mature students.

Many widening access applicants take part in pre-entry activities such as summer schools which, in some instances, allow them to meet the conditions of an offer. It is difficult to see how this could be accommodated in a PQA or PQO system. This is a significant concern to a number of institutions in Scotland and risks undermining progress in widening access to university.

Many Scottish learners sit qualifications over S5 and S6. We are concerned that a PQA or PQO system would encourage more learners to apply at the end of S5, thereby undermining the role of S6 and the benefit of Advanced Higher qualifications, usually taken in S6. Advanced Highers are a requirement for some high-demand subject areas such as Medicine, Dentistry and Veterinary Medicine, and for some institutions in the rest of the UK and undermining these qualifications could limit the options of many Scottish learners. The sixth year has considerable value in personal and academic development for a wide range of school pupils.

More generally, it will be important to look at the impact on different groups of applicants including (but not limited to) students with disabilities, disadvantaged groups, mature applicants using UCAS, international students using UCAS, Scottish applicants (given Scotland's school qualification system and timeline). Engaging meaningfully with these stakeholder groups will be key.

13. 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).



The existing guidance structures, such as in-school support and outreach activities, will still be important under this model and are likely to remain unchanged.

Teachers will continue to be key advisers to school-leaver applicants, and they will undoubtedly still have a role to play in supporting pupils to anticipate the level of their attainment and make considered university applications on that basis. Prior attainment and continuous assessment will undoubtedly be a feature. For Scottish pupils sitting SQA qualifications, prior National 5 and Higher attainment will be relevant.

For all pupils, and particularly those pupils sitting A-levels, accurately predicting their attainment will continue to be a key feature of making university applications.

14. 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?

This could lead to more students applying directly to higher education providers (e.g. international students, mature students, articulating students – these are students who complete a Higher National qualification at college and then move to year two or three at university to complete a degree.)

Where there could be a fracturing of application processes by student group, it will be important to reflect on the implications of this for universities, and the impact on the kind of support they will be able to offer applicants throughout the admissions cycle.

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

Yes.

A limit on the number of courses applied to is necessary to support considered decision-making for students and manage planning, number controls and workload for universities. This should be no greater than the current limit of 5 courses and should possibly be fewer under a PQ model. The challenges around student number planning would need to be balanced with the need to keep options open for students – we would not like to see students be less aspirational in their university choices if they had fewer options. In this instance, ranking choices may be necessary.

16. 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 would depend on a number of different factors, including the number of courses applicants apply to. It will vary hugely across institutions and programmes, depending on the level of competition, the size and resource of admissions teams, and more. Processing offers within such a condensed timescale would require additional staffing resource for many, if not all, institutions.

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

It would be extremely challenging to accommodate additional entry tests, auditions, and interviews under this model.



This may have the perverse effect that applicants are doing significant extra preparation for assessments where they may not be qualified for the programme.

We note the work of UCAS/UUK on a post-qualification offers model where institutions would be given some information about applicants before results are released. This would be preferable as it would allow for some level of selection before qualifications are awarded, helping to manage the volume of auditions/interviews to be delivered and avoiding a situation where applicants are undertaking preparation for assessments where they are unaware they are not qualified for a programme.

18. 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?

This is a repeat of Q11, please see Q11 response.

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

Wider implications are discussed below.

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.

Schools, further education colleges, higher education providers and representative bodies are all key players in the successful implementation of a PQA system, and further modelling of how these actors could successfully deliver a PQA system will be crucial to determine whether such a system is practicable. As highlighted elsewhere, it's likely that the condensed timetable of a PQA system would have significant resource implications for many of these groups.

2. Should personal statements be removed?

There is a role for qualitative information about an applicant which can help to demonstrate preparedness for their studies, and to identify particular challenges or barriers. If no personal statements are allowed, other differentiators would be necessary for selective programmes where there are fewer places than well-qualified applicants. In the proposed systems, interviews may also be impossible. This would beg the question of whether universities could and would implement their own testing regime to assess applicants' potential early.

Some evidence suggests that applicants prefer a personalised admissions experience, of which the personal statement is an important part.

Where there are concerns that the personal statement could disadvantage underrepresented groups, we would support a review of how relevant information is captured, for example through a number of user-defined questions, rather than the free-text approach to the personal statement currently.

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.



Accurately predicting attainment will continue to be a key feature of making university applications, and this is a process that teachers and advisers will ultimately continue to be involved in.

Students currently outside the UCAS system

- 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?**

It would not be possible for international students to be included in scope of a PQA system for the reasons outlined in the question. However, we believe there are significant risks and challenges associated with fragmenting the admissions process by applicant group in this way, which could have a considerable detrimental impact on international recruitment and admissions.

Providing appropriate advice, guidance and support to international applicants is an important part of the recruitment and admissions process. Creating a two-tiered system of admissions would exacerbate confusion for international applicants and advisers.

We have concerns that such a two-tiered system of admissions would entrench perceptions of unfairness in access to higher education between students of differing fee status. This is already a challenge faced by institutions with a high proportion of international students.

A significant challenge in putting international applicants 'out of scope' is that we need first to adequately define international students and appropriately communicate this to potential applicants. Admissions practitioners are keenly aware of the complexity that comes with confirming fee status. Many UK-domiciled applicants have international fee status, and applicants who are schooled abroad are eligible for UK fee status – this assessment can be laborious and appropriate time needs to be built into the admissions process to accommodate it. This has the potential to cause further confusion for applicants.

There is the potential for further unintended consequences for international student recruitment. Any action which has the potential to undermine recruitment of international students to UK universities should be interrogated and consulted on fully.

- 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.**

A move to a PQA system does not by definition imply changes in how applications from non-UCAS applicants are considered.

The proliferation of application 'routes' or timelines could present challenges for the university sector, both logistically and because of the need to give equal consideration to all qualified applicants. Those applicants who are qualified at the point of application may prefer an earlier decision, but this may not be practicable, particularly for universities with strict student number controls, which includes all institutions in Scotland. If more and more applicants apply outside of the UCAS system, this makes such a system less suited to universities' needs and will likely reduce its use.



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

We welcome the opportunity to respond to proposed changes to higher education admissions to a system of post-qualification admissions (PQA) as part of this profoundly important consultation.

Any move to reform admissions should be grounded in the following principles:

- Increasing fairness, combatting inequality
- Furthering a widening access agenda
- Putting the applicant at the centre
- Maintaining a UK-wide admissions system that works for all four nations.

It is absolutely crucial that there is a genuine four-nations approach to admissions reform, and that this reform does not jeopardise alignment of systems across the UK. It is key that this work is undertaken collectively. It is in learners' interests that we maintain a UK-wide admissions system that works across England and the devolved jurisdictions, not least because many students apply to universities in more than one part of the UK and it is important that they continue to be able to do so with ease.

We believe that the university sector, in partnership with governments, schools, colleges and UCAS, is both well-placed and motivated to lead admissions reform.

This consultation should form part of a genuine and wholesale engagement on fairness in admissions. We note the work that UUK has undertaken through their Fair Admissions Review and support their proposed principles of fair admissions, updating the Schwartz principles:

- A fair admissions system should be transparent
- A fair admissions system should enable institutions to select students who are able to complete the course as judged by their achievements and their potential
- A fair admissions system should strive to use assessment methods that are reliable, valid, and explainable.
- A fair admissions system should seek to minimise barriers for applicants and address inequalities
- A fair admissions system should be professional in every respect and underpinned by appropriate institutional structures and processes

A move to a system of post-qualification admissions (post-qualification applicants or offers) is one way in which fairness could be improved in admissions but it is not self-evidently the only solution to the issues underpinning this consultation. Indeed, it is not self-evidently the best way of addressing concerns around undermatching. Equally, the issues are not uniformly evident across the whole sector: for example, conditional unconditional offers are much less prevalent in the Scottish sector.

The data do not suggest that students from underrepresented groups are more likely to have their grades under-predicted by teachers (Corver, 2021). This suggests that if undermatching is a significant issue for students, there may be better ways of addressing the issue. This could include:

- Improving information, advice and guidance provision for pupils



- Enhancing Clearing and Adjustment to support more agility after qualifications are awarded. For example, institutions could consistently hold back a proportion of places to enable them to make offers in this post-qualification period.

There are some areas which we feel are underexplored in this consultation that need to be further interrogated, including, but not limited to:

- The importance of a system that works for international students as well as home students;
- The importance of a system that works for institutions with strict number controls, which includes all institutions in Scotland;
- Recognising the diversity of university applicants: in Scotland, a quarter of university students are over 21 and are entering higher education through a range of different routes. The proposed PQA/PQO models are focused clearly on school-leaver applicants;
- The ability to accommodate auditions, interviews and portfolio assessment into the system;
- The holistic support that universities provide to applicants and offer-holders, including ongoing information, advice and guidance, post-application or post-offer visits, online and in-person transition activities in the summer before study begins. In particular, many Scottish institutions offer summer school programmes to offer-holders which not only act as an opportunity for widening access applicants to bolster their qualifications, but also act as an impactful pre-entry transition experience which improves attainment and retention;
- A potential impact on retention of Year 1 students;
- A potential impact on the Scottish qualifications system. In particular, the undermining of S6 and Advanced Higher qualifications.

We believe there is more to do to ensure genuine and meaningful engagement with all of the key stakeholders in this process, including:

- Engaging further with stakeholders on the issues underpinning admissions reform and the possible solutions (we note the work of UUK, which can be built upon);
- Modelling the implications of such a change for all stakeholders, including HEIs, awarding bodies, different applicant groups (school-leavers, college students, mature students, those with particular protected characteristics);
- Identifying and assessing the risks of the proposed reform from the perspective of all of the relevant stakeholders;
- Mapping a comprehensive stakeholder engagement plan.

We believe that admissions reform should start with the principle of improving fairness, should fully elucidate the issues with the current system it intends to address, and should draw out proposals for reform that clearly address these issues. Given that the supposed unreliability of predicted grades may be overstated (Corver, 2021 for HEPI) and that the use of conditional unconditional offers can be regulated in a number of different ways, we question whether implementing a post-qualification applications system is the best project of admissions reform. Certainly, as highlighted throughout our response, there are many areas that would need to be explored in greater detail before we could be confident that a post-qualification admissions system



would be a preferable option to our current system. We are, however, committed to positive change and have consideration to possible reforms which could improve fairness, simplicity and transparency within the current system, which could include: the ringfencing of a proportion of university places for WP applicants at the end of the admissions cycle; a review of Clearing and Adjustment to maximise flexibility and agility for applicants; a shortening of the 'offer window'; a move to user-defined questions for the personal statement and reference.

We look forward to engaging further as this consultation progresses.

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).

We have highlighted some relevant issues with respect to people with protected characteristics, most particularly disabled applicants. A full equality impact assessment should be undertaken.

