



Department
for Education

Post-Qualification Admissions Reform

Government consultation

Launch date 21 January 2021

Respond by 13 May 2021

CP 340



Post-Qualification Admissions Reform Government Consultation

Presented to Parliament

by the Secretary of State for Education

by Command of Her Majesty

January 2021



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Foreword by the Secretary of State for Education

The UK is world-renowned for the quality of its higher education, with four universities ranked in the top ten globally. Every year we see record numbers of students entering our universities, and for many, this transforms their skills and boosts their economic opportunity. However, it is becoming increasingly evident that the current system of admissions to higher education is preventing some students from reaching their full potential at the first hurdle. We have a system that was designed for a different age. We want to have an admissions system designed for today that is most importantly working in the best interest of the student.



If we were starting from scratch today, we would not design the higher education admissions system we have now – a system which, with its reliance on predicted grades, is complex, lacks transparency, works against the interests of some students. That is why in November I announced the government’s intention to explore a Post-Qualification Admissions (PQA) system for higher education, where students would receive and accept offers after they have received their A level (or equivalent) grades. This consultation follows that announcement, to explore proposals to remove the unfairness that exists in the current system of admissions.

Under this Government, we are seeing record numbers of disadvantaged students going to university; however, there is still more to do. By using predicted grades, it is limiting the aspirations of students before they know what they can achieve. We know that this disproportionately affects the brightest children from the most disadvantaged backgrounds.

I want to smash through ceilings that are preventing students from reaching their full potential, and I believe exploring this reform will help to do that. Moving to a system where offers are made after students have received their results could also put an end to the soaring use of unconditional offers, which sees students being encouraged to accept an offer which may not be in their best interest and reduces the incentive to work hard at A-Level. Such offers can leave those students unprepared for university study, more likely to miss their predicted grades and, later on, more likely to drop out of their course.

We need to explore how to change a system which in some circumstances, can breed low aspiration and unfairness. That is why we are exploring how to transform the Higher Education admissions process to one which can propel young people into the most promising opportunities for them within higher education. It has been a challenging time for the education sector, but Covid-19 will not stop this Government from levelling the playing field and empowering students to have the very best opportunities to succeed. We hope you will take the opportunity to share your views, and work alongside us to help improve the outcomes of all students.

A handwritten signature in blue ink, which appears to read 'Gavin Williamson'. The signature is fluid and cursive, written on a white background.

The Rt Hon Gavin Williamson CBE, Secretary of State for Education

Introduction

This consultation seeks views on whether to change the current system of higher education admissions and move to a system of post-qualification admissions (PQA). PQA could see students receive and accept university offers after they have received their A level (or Level 3 equivalent) grades, as opposed to the current system in which students apply up to a year before starting and are made offers on the basis of predicted grades.

This consultation follows the commitment from Government to level up the university admissions system and supports the wide-ranging further and higher education reforms as part of a unified strategy for post-16 education reform. Our Government manifesto committed to “**improve the application and offer system**” and “**tackle the problem of low quality courses**” in a way that is **“underpinned by a commitment to fairness, quality of learning and teaching, and access”**. **This consultation has the backing of the three devolved governments**. While the current admissions system has evolved and reformed over the last 20 years, to respond to changes in the student demographic and wider changes to the HE system, there are still aspects of the current HE admissions system that fall short of this commitment and doesn’t serve certain groups of students well. We believe that a more fundamental reform, such as PQA, has the potential to contribute towards improved student outcomes in the longer-term, moving towards a higher education system that provides a twenty-first century offer for all students.

We will analyse the responses from this consultation carefully – including evidence on the impact on schools, colleges, providers and other organisations – before taking a final decision on whether and how to introduce a PQA system.

Who this is for

This consultation is for anybody throughout the UK with an interest in higher education, particularly the admissions process. This includes:

- Schools and further education institutions and their staff, career advisors, teachers and leaders
- Students who have been through the higher education application system or plan to do so in the future and their parents/guardians
- Higher education providers
- Higher education stakeholders, representative bodies and charities
- Representative bodies for students and student groups
- Other government bodies and departments
- Awarding organisations

Issue date

The consultation was issued on 21 January 2021.

Enquiries

If your enquiry is related to the policy content of the consultation you can contact the team by email:

pga.consultation@education.gov.uk

If your enquiry is related to the DfE e-consultation website or the consultation process in general, you can contact the DfE Ministerial and Public Communications Division by email: Consultations.Coordinator@education.gov.uk or by telephone: 0370 000 2288 or via the [DfE Contact us page](#).

Additional copies

Additional copies are available electronically and can be downloaded from [GOV.UK DfE consultations](#).

The response

The results of the consultation and the Department's response will be [published on GOV.UK](#) in Summer 2021.

Respond online

To help us analyse the responses please use the online system wherever possible. Visit www.education.gov.uk/consultations to submit your response.

Other ways to respond

If for exceptional reasons, you are unable to use the online system, for example because you use specialist accessibility software that is not compatible with the system, you may download a word document version of the form and email it to.

By email

- pga.consultation@education.gov.uk

Deadline

The consultation closes on 13 May 2021.

Proposal: A Post-Qualification Admissions System

Background

The current higher education (HE) admissions system has been in place since the 1960s and has adapted to significant changes in the provider and student landscape during that time. Recent years have seen enhancements to the student application experience. It is now easier and simpler for students to change their first choice in the light of their actual results, or a change in their personal circumstances. UCAS is moving towards a more personalised and interactive service, which increasingly helps applicants make choices on the basis of their stated preferences. In 2020, 75.2% of placed UK 18 year old applicants were placed at their first choice ¹

Significant progress has also been made by the sector in access for young disadvantaged students. 2020 saw record numbers of 18 year olds accepted into HE from areas with a history of low participation, while higher tariff providers accepted more disadvantaged students than ever before.¹ However, there is widespread recognition that certain aspects of the current admissions system could be improved to meet the needs of today. The system has increased in complexity in recent decades while the number of students entering has risen rapidly, and the backgrounds of applicants have become more diverse.² In parallel, the HE provider base has expanded significantly, with the emergence and growth of new providers and courses.

This evolution has resulted in a system of admissions that is perceived by some as complex and challenging to navigate. The current system can also create barriers for applicants, often the most disadvantaged, who have unequal access to information and guidance. Post-Qualification Admissions (PQA) has been proposed as a reform that could help alleviate some of these issues by a wide variety of groups and commentators across the political spectrum – including The Sutton Trust, The Universities and Colleges Union (UCU), The UCL Institute of Education and Policy Exchange. A recent report that surveyed opinion of vice chancellors, headteachers and college principals found that over 60% of respondents felt that the current system is ‘not fit for purpose’ and 80% wanted to explore allowing students to apply after results are known.³ Most recently, UCAS and Universities UK have concluded that now is the time for admissions reform to be considered, following months of engagement with students, schools, colleges and universities.⁴ This consultation will build on these findings, working across education sectors, to agree how reform could be delivered.

¹ [UCAS 2020 End of Cycle report](#)

² A record 570,475 people were accepted through UCAS to start an undergraduate course in the 2020 cycle (Source: [UCAS 2020 End of Cycle report](#))

³ *Higher Education Admissions: The Time for Change* (UCU, August 2020).

⁴ <https://www.ucas.com/corporate/news-and-key-documents/news/ucas-maps-reforms-higher-education-admissions>; <https://www.universitiesuk.ac.uk/policy-and-analysis/reports/Pages/fair-admissions-review.aspx>

Weaknesses in the current system

Under the current system of admissions, applicants in their final year of school or college apply using predicted grades. Predicted grades are made on the basis of a teacher's assessment and judgment some six to nine months before students take their exams, when in most cases just over half of the curriculum has been covered. We know from analysis that predicted grades are not accurate and have become increasingly less so over time.⁵ Applicants must accept offers before receiving their Level 3 results, meaning they don't have the necessary information to make an informed choice, increasing the likelihood that they make poor decisions which could lead to poor outcomes. Under a PQA system there is an opportunity to ensure less, or no, reliance on predicted grades as students might base their choices on grades achieved during the academic year or in their Level 3 qualifications.

There is evidence that disadvantaged students 'undermatch' in relation to the grades they actually achieve.⁶ This means they end up studying courses, or at institutions, with lower entry requirements than ones they could have studied at, based on their final grades.⁷ This could have consequences for their outcomes following graduation and could have ramifications for social mobility more widely. A PQA system might encourage disadvantaged students to be more aspirational in their choices and identify courses they are better matched to.

The use of conditional unconditional offers⁸ and other undesirable admissions practices such as material inducements to persuade students to enter certain courses has also increased in recent years, dramatically in the case of conditional unconditional offers. Such offers made to applicants who are still awaiting their results can encourage them to select an offer which may not be in their best interest. There is also evidence that they have negative impacts on academic performance and higher education non-continuation rates (outlined further below). This issue would be addressed directly by a PQA system as students would already have received their results before receiving an offer of a place at university. UCAS, the Office for Students (OfS) and the higher education sector have made efforts to address these issues. This has resulted in reforms such as the UCAS processes of 'Clearing +' that seeks to support students who did not achieve the terms of their offer, and 'Adjustment' that allows those who did better than expected to 'trade up'. Nevertheless, long-standing problems remain, suggesting that more far-reaching reform could be required to level up admissions.

⁵ UCAS [End of Cycle data resources](#) for 2019

⁶ Nuffield Foundation report [Mismatch in Higher Education](#) 2019. Disadvantage refers to a student's Socio-economic status

⁷ Department for Education: *Progression to higher education or training* (September 2020).

⁸ Conditional Unconditional Offers are where it is made clear to the applicant that the offer would be converted to an unconditional offer if the applicant selects the offer as their firm (first) choice.

Considering PQA as a Solution

We believe that it is time to explore whether a PQA system could address some of the challenges posed by the current HE admissions system: namely, that it is complex, lacks transparency, works against the interests of some students, and encourages undesirable admissions practices. Key delivery partners, as well as those across the education sector, have signalled that this is the right time to review the system. The experience of having completed full Level 3 qualifications, and knowledge of their actual results could put students in a better position to decide on their best options for further study. PQA could allow them to consider the full range of available qualifications, including higher technical qualifications as well as degree level study. Hence, it may lead to more students making better informed decisions, improve continuation rates⁹ in higher education and potentially lead to better career outcomes for students.

Exams are a critical part of the education system, giving students the foundations they need to move on to the next stage of their life. Exams have evolved over time, reflecting evidence of how to assess students in ways that are manageable, to give each student the opportunity to demonstrate their performance. They are the fairest and most accurate way to measure a pupil's attainment, and the best way of judging what students know and can do. A level (or equivalent qualifications) open the door to the next stages of higher and vocational education at age 18. It is, therefore, desirable that decisions by both students and universities are made on the basis of grades actually achieved, rather than predictions made a considerable time before many applicants have sat their exams.

PQA could help level up university admissions by removing complexity in the system that hinders some students, particularly those who are disadvantaged and have less access to the knowledge needed to work the complex system to their advantage. If so, this will have positive implications for social mobility, by removing some of the barriers to the more selective universities and courses for high achieving but disadvantaged students.¹⁰

The Sutton Trust is recommending we move to a post-qualification applications system. [...] Having actual grades on application empowers the student. They can pick the right course at the right university with a high degree of certainty they are making the right choice.

Sir Peter Lampl, Founder and Chair of the Sutton Trust (2017).

Most recently, as noted above, UCAS and Universities UK have acknowledged that now is the time for admissions reform to be considered. On 13th November 2020, UUK published its Fair Admissions Review, which followed 18 months of engagement across the education sector. Its recommendations have been made in collaboration with representatives from schools, colleges, universities and UCAS.

⁹ [The Office for Students](#) define 'Continuation' to any of the following outcomes for a student one year and 14 days after they have started their studies. Continued: continued studies at the same higher education provider. Qualified: received a higher education qualification.

¹⁰ G Wyness, [Rules of the Game: Disadvantaged Students and Admissions Practices](#), Sutton Trust 2017

These recommendations include the end of using ‘conditional unconditional’ offers, and a proposed switch to PQA. The report states that “further consideration should be given to a reformed undergraduate admissions system based on a Post-Qualifications Admissions (PQA) model”¹¹.

Over the consultation period, we will collaborate extensively with UUK and the HE sector, which will include regular engagement from Ministers and DfE officials. This will be with the aim of seeking a mutual outcome that brings about positive change to the admissions system. We are aware that despite the potential benefits of PQA, the challenges we may face in implementation may result in the policy being unviable. Implementing PQA would involve major administrative changes and have practical implications for other parts of the education system too, not only HE. We are particularly mindful of the impact on schools and colleges, and will want to consult in detail on this to ensure that PQA, if implemented, would not adversely impact teachers, students and the quality of admissions staff’s decision-making. We will need, for example, to consider how students who have additional or special requirements could be adequately supported. It is, therefore, important that we consult on potential reform. Any PQA system should work for the education system as a whole, and we would encourage responses from across the education sector and from the general public on how you think this policy might affect you and suggestions on how we could take forward implementation in the best possible way.

It is our intention to work with the whole education sector (Higher Education, Further Education and Schools) to assess the case for PQA by consensus.

We recognise that reform of the admissions system in England would have implications for the whole of the UK, and have spoken to the Devolved Administrations about our plans. The Scottish and Welsh Governments, along with the Northern Ireland Minister for the Economy all welcome this consultation. Once we have received and analysed all of the responses to this consultation, we will work together with the Devolved Administrations to ensure that students will experience a system that is easy to navigate and transparent, no matter where in the UK they are from or intend to study.

The Case for Change: analysis and evidence

Government has committed in its manifesto to improving the application and offer system in a way that is “underpinned by a commitment to fairness, quality of learning and teaching, and access”. Evidence shows that the current admissions system falls short of this commitment. A system of PQA could help to meet our commitment by streamlining the system, levelling up students’ knowledge of how to navigate university admissions and addressing some of the particular challenges faced by disadvantaged students. The evidence behind this and rationale for intervention, is set out below.

1. The inaccuracy of predicted grades

Analysis shows that predicted grades are often not accurate and have become increasingly less accurate over time. UCAS’ End of Cycle reporting for 2019 shows that

¹¹ Fair Admissions Review (UUK, November 2020)

of UK 18 year old applicants with at least three A levels who were accepted on to a place, 79% of individuals had predicted grades which were overpredicted (so for example, AAB, might be predicted and ABB achieved) and 8% were underpredicted (for example, BCC might be predicted and BBB achieved). Moreover, the proportion with overpredicted grades has increased from 63% since 2010.¹² In 2020, Sutton Trust found that one in four applicants surveyed would have made a different decision about their HE institution and course if making the choice based on final grades.¹³ Issues attributed to this include:

- **Adverse impact on high-achieving disadvantaged students.** While the majority of inaccurate predictions involve over-prediction, and disadvantaged students¹⁴ are more likely to be overpredicted, high-achieving disadvantaged students¹⁵ are more likely to be under-predicted than high-achieving advantaged students. This is problematic as those who are high-achieving but underpredicted were 10 percentage points less likely than their peers to apply to the most selective institutions and 6.9 percentage points more likely than their peers to enrol on courses where they are more qualified than their peers.¹⁶ This has negative implications for social mobility, for the reason outlined below.
- **Undermatching.** Undermatching occurs where an applicant accepts a place on a course that requires lower grades than they have actually achieved, and they could consequently have secured a place on a more competitive course. Research looking at the achieved grades of individuals compared to the average attainment of their course found that 15% of students 'undermatch' according to qualifications gained and there is a higher likelihood of disadvantaged¹⁷ students being undermatched (some of which may be explained by the prevalence of high achieving disadvantaged students being under-predicted their final grades).¹⁸ This means that under the current system they are less likely to secure places at the most selective courses, negatively affecting the prospects of disadvantaged students and therefore social mobility. PQA could help to address this as applications would be made to providers based on achieved grades, and under this system previously underpredicted disadvantaged students would have the opportunity to apply to the most selective providers and courses, therefore levelling up access to higher education for disadvantaged students.

We believe changing to PQA would be a significant step forward in addressing continuing inequalities in access to higher education.

Universities and Colleges Union (2015)

The projected benefit particularly to high achieving but disadvantaged students is one that will have positive implications for social mobility and is therefore paramount.

¹² UCAS [End of Cycle data resources](#) for 2019. See also <https://www.ucu.org.uk/article/8558/Predicted-grades-accuracy-and-impact>

¹³ Sutton Trust, [PQA: Reforming University Admissions](#), 2020

¹⁴ Measured using POLAR4 Quintile 1

¹⁵ Where high-achieving is defined as AAB or higher

¹⁶ UCL report: [The impact of predicted grades on university admissions of disadvantaged groups](#) 2020

¹⁷ Measured using Socio-Economic Status (SES)

¹⁸ Nuffield Foundation report [Mismatch in Higher Education](#) 2019

2. Simplicity and transparency

The increasing complexity of admissions in recent decades can mean that the system is poorly understood by those who have unequal access to information, advice and guidance. It is often the most disadvantaged, and those who are the first in their family to go to university, who are hindered by this.¹⁹ In deciding where to apply, we know that students want 'greater transparency in relation to actual admission grades, the extent to which work experience or volunteering are taken into account, and genuine, respectful understanding of disadvantaged circumstances'.²⁰ PQA could offer a more transparent and streamlined process for students navigating the admissions system by addressing:

- **The mismatch between course grades advertised and the grades accepted.** In 2019 UCAS identified that 49% of 18-year-olds who sat at least three A-levels, were accepted with lower grades than those advertised, highlighting a trend where advertised grade requirements for courses do not always match the grade profile of students admitted.²¹ Whilst this is an issue of transparency for all students, this is particularly problematic for disadvantaged students who are more likely to be risk averse and will apply for courses they believe they are likely to achieve the grades for.²² As part of the reform process, we will seek to introduce greater transparency around actual entry requirements. We endorse proposals (from OfS and others) that providers publish full information about the qualifications achieved by students entering courses in previous years.
- **Complex additional admissions processes.** Processes such as 'clearing' (a service matching applicants to university places that are yet to be filled) and 'adjustment' (an optional service for students who meet and exceed the conditions of their firm choice) have been designed in part to address issues related to students achieving above or below their predicted grades, or changing their minds.
 - **Clearing** is a fundamental part of the current admissions system, where this process is required so that those who have been rejected by their original choices, either on original application or by missing their predicted grades, can still find a university place. While helpful to some extent in doing so, this process adds further complexity to the overall system.
 - **Adjustment**, a specific reform which has been in place for around ten years to address the issue of undermatching. It is underused and is more likely to benefit more advantaged students.²³

As outlined above, despite these processes, there is still mismatching within the admissions system, suggesting the need for more systematic rather than piecemeal reform. Furthermore, students with families with a history of entering HE and those who benefit from more formalised school support are more likely to understand these processes, and therefore navigate them to their advantage.²⁴ This can

¹⁹ G Wyness, [Rules of the Game: Disadvantaged Students and Admissions Practices](#), Sutton Trust 2017

²⁰ UCAS [Through the lens of Students 2016](#)

²¹ UCAS, [End of Cycle Report](#), 2019

²² Nuffield Foundation report [Mismatch in Higher Education](#) 2019

²³ University College Union report , [Post Qualification Application](#), 2019

²⁴ University College Union report , [Post Qualification Application](#), 2019

compound access challenges for more disadvantaged groups who are less likely to have this support and guidance. A PQA system where admission to a specific provider could take place when final grades are known would simplify the process and make it easier for all applicants to understand.

- **PQA could also offer a clearer and potentially simpler process for managing applications.**

Depending on the design of a PQA system, it may also offer higher education providers a simpler process for managing applications. Different designs also have the potential to reduce the amount of work teachers do in writing references and helping students write their personal statements. We would like to consult on how different ways of delivering PQA would impact the management of application processes from a schools, FE and HE perspective.

3. Unconditional Offers

PQA could also eliminate the use and adverse effects of unconditional offers, as all home applicants would be accepting offers with known grades. Until relatively recently, unconditional offers would typically be restricted to those students, usually mature, already in possession of the required entry-level qualifications, or special cases such as students for whom the assessment of suitability could justifiably be made on the basis of a successful audition or satisfactory portfolio. However, in recent years the significant growth in unconditional offers clearly shows that they are now often being used as a recruitment tool. In 2013, 1.1% of 18-year old applicants in England, Wales and Northern Ireland had an offer with an unconditional component, a figure which had increased to 37.7% by 2019. Three broad problems can be attributed to the increased use of unconditional offers:

- **The risk of reduced attainment and university continuation rates.** The Association of Schools and College Leaders (ASCL) has observed that unconditional offers can lead to students making less effort, and teachers warn that when a certain proportion of pupils with unconditional offers is reached this can have a detrimental impact on the cohort as a whole.²⁵ UCAS analysis from 2019 has shown that unconditional offers are associated with having a negative impact on the A-level outcomes of students, with 18-year olds who accepted one being 11.5% more likely to miss their predicted A levels by three or more grades. The OfS has also identified that those with A-levels who accept an unconditional offer are more likely to drop out after their first year of study¹².
- **The impact on disadvantaged students.** POLAR Q1 (most disadvantaged) applicants are more likely to receive an offer with an unconditional component.²⁶ There is a particular vulnerability for those who are the first in their family to attend university and may lack exposure to people with experience of the UCAS system, as they may be more likely to accept such an offer with limited information about the potential drawbacks. This also has an implication on levelling

²⁵ Policy Exchange, [Sins of Admission: How University Admissions Processes Impact Schools and Colleges](#), 2019.

²⁶ Office for Students [Data analysis of unconditional offers: Update](#) 2020

up access , with those accepting unconditional offers potentially passing up the opportunity to attend another institution, which may have been a closer a match to their grades or of a higher tariff. This is working against the goal of fair access.

- **Constraining choice.** Students accepting offers solely on the basis of them being unconditional potentially deprive themselves the chance to consider other universities, and in some cases leading them to make sub-optimal choices. There is evidence that teachers feel less confident in offering pupils advice about their next move in a system where unconditional offers are increasing.²⁷

Under a PQA system, the negative effects of unconditional offers could be curtailed, as HE providers would no longer be in a position to provide such an offer to students months before the completion of Level 3 courses, thus preventing their use as a marketing tool.

Implementation

Whether or not to deliver a PQA system, and the most optimal model for delivery, will depend on the responses we receive as part of this consultation and the broader discussions we have with key partners and those who would be impacted by reform. As part of this, we want to fully understand the potential costs, adverse effects or barriers to implementation.

²⁷ Policy Exchange, [Sins of Admission: How University Admissions Processes Impact Schools and Colleges](#), 2019.

Not in Scope

The scope of this consultation considers the proposed changes to undergraduate higher education admissions to a system in relation to when students receive and accept university offers. This consultation does not consider, or propose changes to the following:

- Level 3 (A level and equivalent) assessments
- The use of UCAS as an application tool for undergraduate courses
- The application processes for postgraduate courses
- The need to have regard to the autonomy of higher education institutions in determining the criteria for the admission of students and applying those criteria in particular cases.
- The Government's wider policy on Access and Participation, including the approval of Access and Participation Plans, as regulated by the OfS.

About You

1. Please provide your name.

2. Please provide your email address.

3. Are you responding as an individual, or as part of an organisation? (please circle)

Individual / education provider / local authority/ charity/ other organisation

4. If you are responding on behalf of an organisation please provide the following:

Organisation name

Organisation postcode

Role

5. If you are responding as an individual, please confirm whether you are a:

Parent/Carer/Guardian/Child or young person/ other

6. Are you happy to be contacted directly about your response? (please circle)

Yes/No

7. How did you hear about the consultation?

Information provided in response to consultations, including personal data, may be subject to publication or disclosure under the Freedom of Information Act 2000, the Data Protection Act 2018, or the Environmental Information Regulations 2004. If you want all, or any part, of a response to be treated as confidential, please explain why you consider it to be confidential. If a request for disclosure of the information you have provided is received, your explanation about why you consider it confidential will be taken into account, but no assurance can be given that confidentiality can be maintained. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as binding on the Department. The Department for Education will process your personal data (name and address and any other identifying material) in accordance with the Data Protection Act 2018, and your personal information will only be used for the purposes of this consultation. Your information will not be shared with third parties unless the law allows it. You can read more about what the DfE does when we ask for and hold your personal information in our personal information charter.

8. Do you wish for your response to remain confidential?

Yes / No

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?

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.

PQA Delivery and Implementation

There are a variety of ways that a PQA system could be delivered and we are aware of the impact delivery could have across relevant sectors including schools, further education institutions, higher education providers and for applicants, teachers and parents/carers.

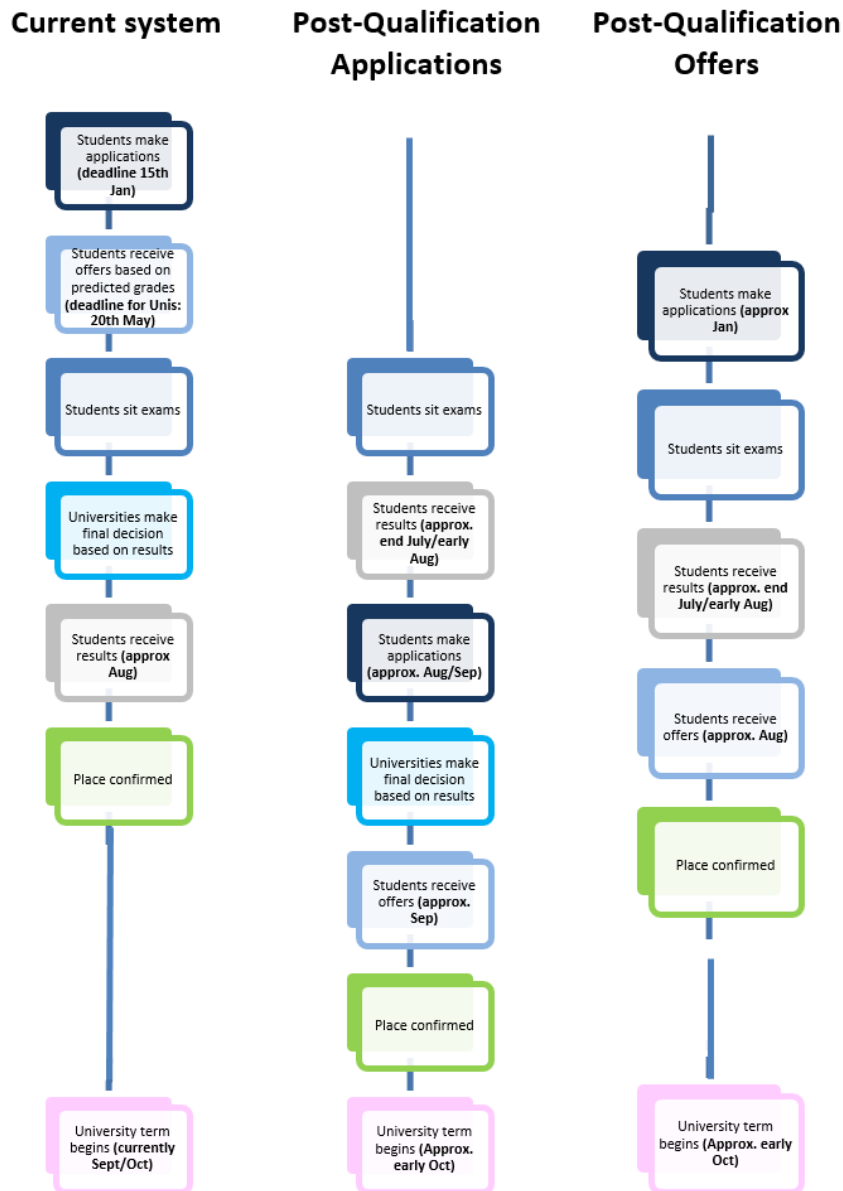
Some proponents of PQA have suggested a model in which post-qualification applications and offers take place from August onwards with no changes to Level 3 results dates, but with HE terms starting anytime between November and January. However, we have ruled out specifically considering this as a potential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

Illustrative models for a PQA system

To probe delivery further, we have set out below two illustrative models for a PQA system, which we believe are most feasible based on our analysis to date. Additional questions relevant to all delivery models are included later in this consultation document.



Model 1: ‘post-qualification applications and offers’

‘Post-qualification applications and offers’, with a longer application window created by moving results dates forward to the end of July and HE term dates back to the first week of October.

- Currently, A levels take place between May and June, and results are usually published on the Thursday closest to mid-August, with results of other Level 3 and vocational and technical qualifications (VTQs) generally published around the same time. The majority of HE providers welcome new starters to their institutions between mid-September and mid-October.
- By moving results dates forward to the end of July and starting the university term no earlier than the first week of October, a longer period between students getting their results and starting university could be carved out. This period should allow at least six weeks for the processing of applications, and the making of offers. It would also continue to allow universities to provide a 10 week first term before Christmas.
- We recognise that courses which require additional entrance tests, auditions and/or interviews will also need to be accommodated in this system, and we would welcome views on how this could be done.
- We are exploring different options on how to move results days earlier, with our preference being to compress the exam timetable, the marking period and the requirement for UCAS to receive results data well in advance of results day. Other options could include exams being held earlier but the feasibility and impact of this is something we want to explore in this consultation and through wider engagement.
- It is expected that under this model students could require support in choosing courses and completing their applications. This support could be targeted at specific groups of students and could be provided in a number of ways such as through support staff. However we recognise that if teachers were expected to provide this support there could be implications for their statutory terms and conditions. Our preference would be to avoid affecting teachers’ conditions or workloads as much as possible and we would encourage respondents to provide their views and suggestions on how to avoid this.

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

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.

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.

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

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

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

- Yes
- No
- Not sure

If yes, what implications and why?

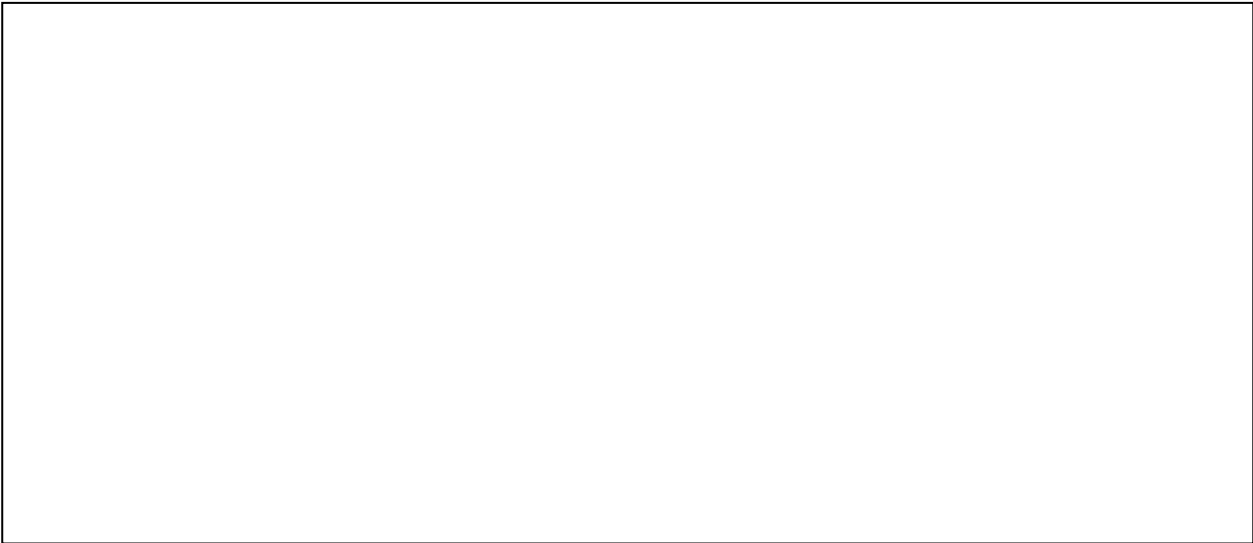
7. Should there still be limits on how many courses they can apply to?

- Yes
- No
- Not sure

If yes, what limits and why?

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

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

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

Applications made during term-time (as now), but offers made after Results Day

- This model could be implemented with smaller changes to results day and University start dates. Alternatively, as with model 1, it could create a longer window of approximately 9-10 weeks for the making and accepting of offers.
- Students apply in the normal way, and at more or less the same time as they currently do. However, applications are held in the system until the results dates (which could be brought forward by a week or two) and offers are only made once results are known.
- Under this model students would require significantly less support over the summer with their applications. However, some students may require support in deciding which offer to accept. As under model 1 we recognise there are potential implications for teachers; however our preference is to minimise any impact and avoid requiring any changes to teachers’ statutory terms and conditions. We would encourage respondent to provide views and suggestions on this issue.
- In order to ensure that no offers are made in advance of the results day, we envisage that the full application could be held by a third party such as UCAS, and then released after Results Day, with some headline data released to providers to enable the planning of intakes, and facilitation of additional recruitment procedures, where these are necessary. So, for example, we will want to look at ways in which courses that require auditions and/or interviews can be accommodated before results days. We would particularly welcome thoughts on how this could work in practice. We would also welcome views on how we might ensure that there is a level playing field between providers and providers are prevented from bypassing the agreed system.
- This model would have implications for, amongst others, higher education providers and sector bodies, schools, FE colleges, students, teachers and organisations involved in the delivery of qualifications. Through this consultation we plan to gather evidence to understand these implications in more detail and to minimise any adverse effects should we move forward with implementing a PQA system.

Questions for Model 2

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

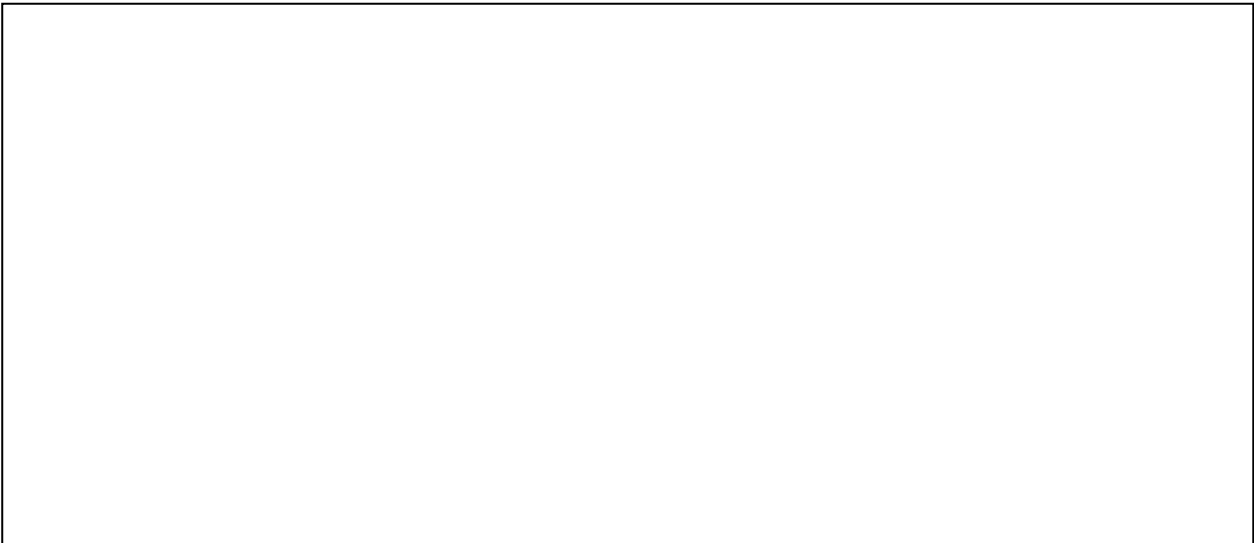
10. Do you think this system would be better than the current system, worse, or no significant improvement? In the text box below, you can refer to the potential costs, adverse effects or implementation challenges of such a reform.

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

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?

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.

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?



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).



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?

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

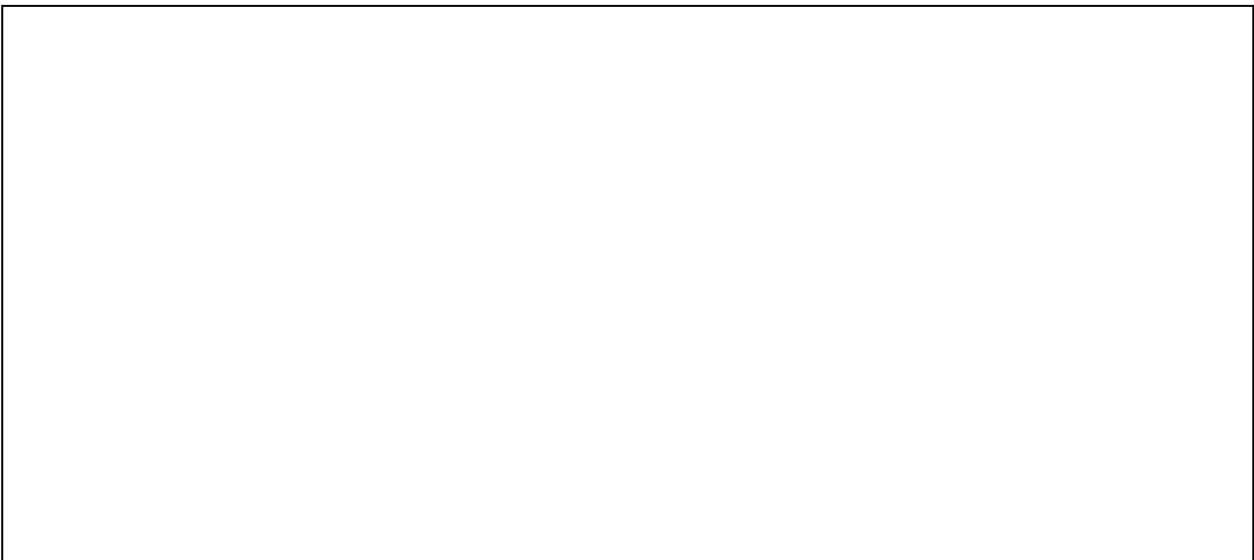
- Yes
- No
- Not sure

If yes, what limits and why?

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.



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

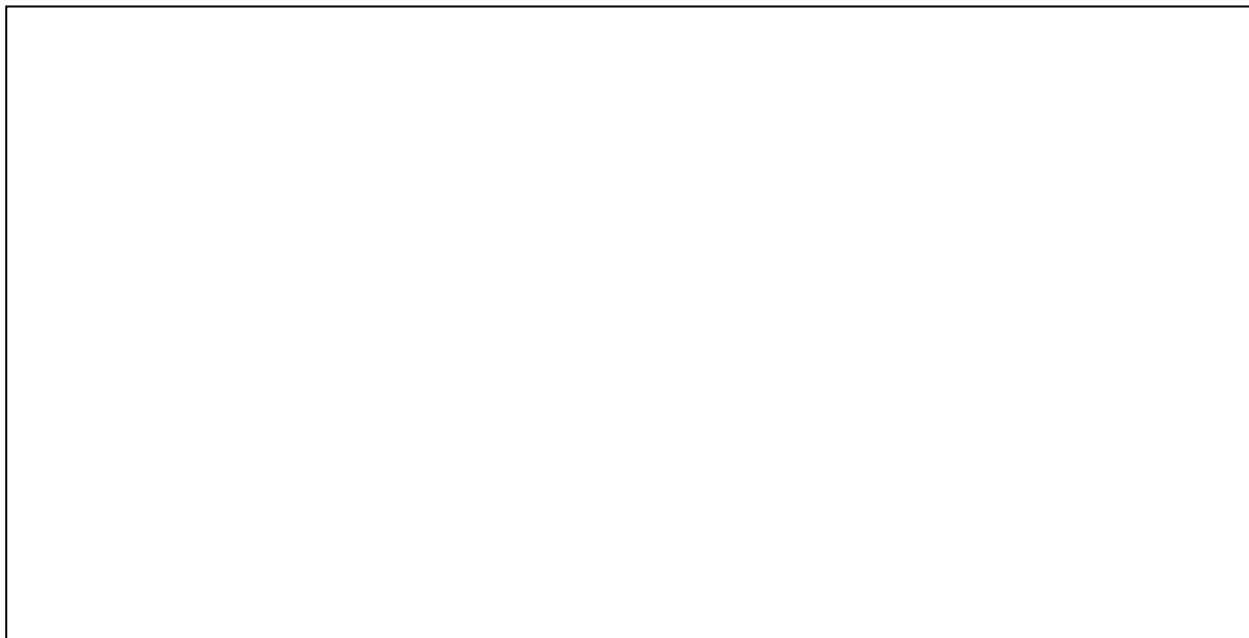


Under Model 2, offers would be made to applicants after results day, outside of term time.

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?



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



Further Questions

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

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

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

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

In recent years, some, including The Sutton Trust and the HE Access Network have argued for the removal of personal statements from the application process. They argue that an applicant's school type is a key predictor of the quality of their personal statement, with those from more advantaged educational backgrounds more likely to receive support and guidance. Evidence shows that in analysis of statements written by young people who would go on to achieve identical A level results, clear writing errors were three times more common in the personal statements of applicants from sixth form colleges and comprehensive schools, than in statements of applicants from independent schools.²⁸

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

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

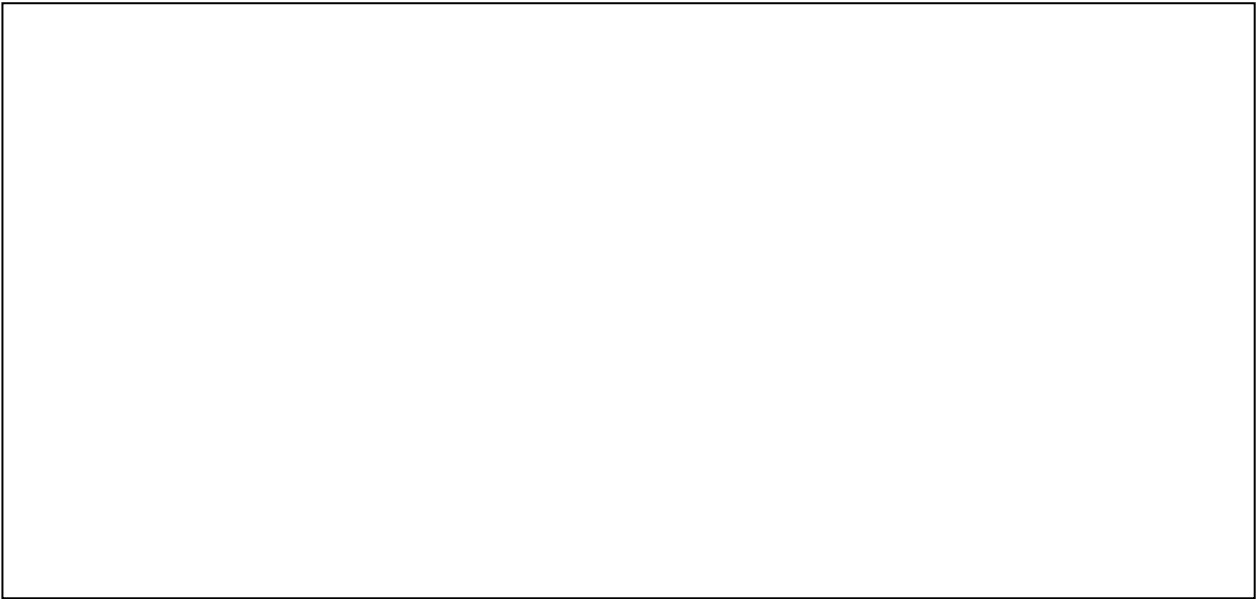
- Yes
- No
- Not sure

²⁸ Sutton Trust. 2012. "Is the personal statement a fair way to assess university applicants?"

Please provide a reason for your answer.



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.



Students currently outside the UCAS system

a) International Students

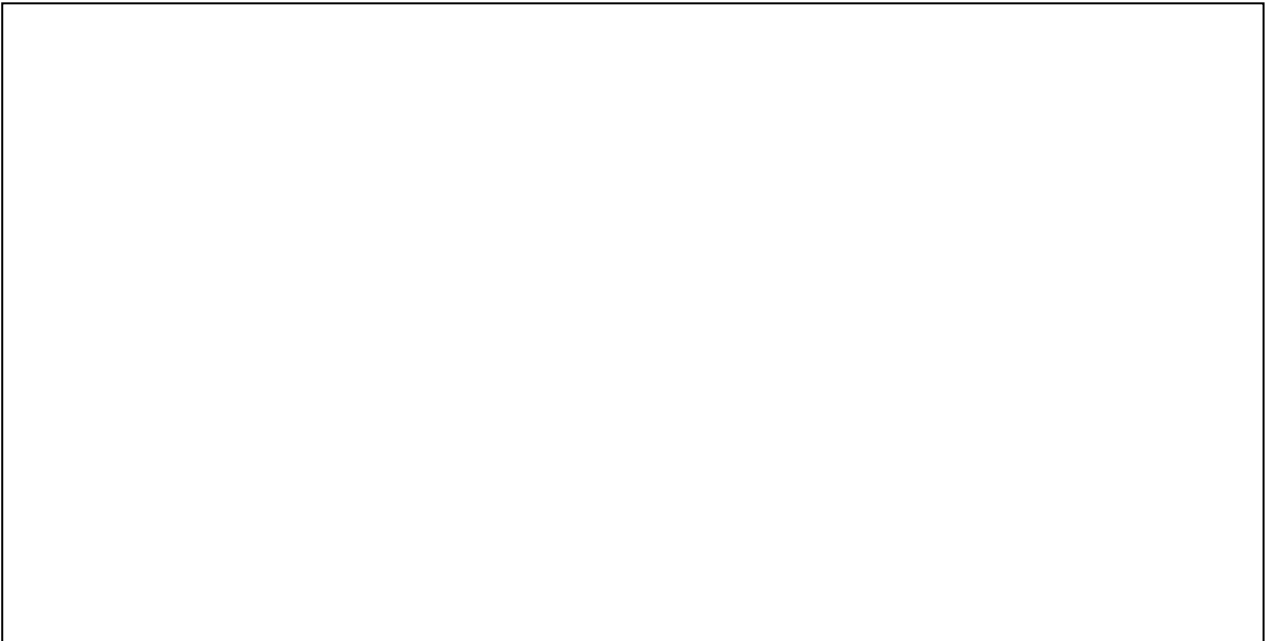
This country has many world-leading universities, and it attracts great numbers of students from overseas as a result. International students contribute in turn to the rich diversity of the student experience as well as the quality and variety of universities' provision and research, to the benefit of the whole student population. Of the 1.5 million undergraduate students enrolled at English HEIs in 2018/19, 222,000 (15%) are international, 60% of which applied through UCAS. We would want to be sure that any change to the admissions system does not create an unnecessary barrier to the continued recruitment of highly valued international students. International students are not currently in scope of proposed PQA. This is due to the significant variances in exam timetabling around the world which means a considerable proportion of international students are unable to apply using the UCAS systems and associated deadlines. 50% of international students are postgraduates, and so would be out of scope in a PQA system. In addition, international students can only apply for a visa once they have their university offer in-hand, and including them in a PQA system would truncate the amount of time available for visa processing and application.

b) Part-time and mature students

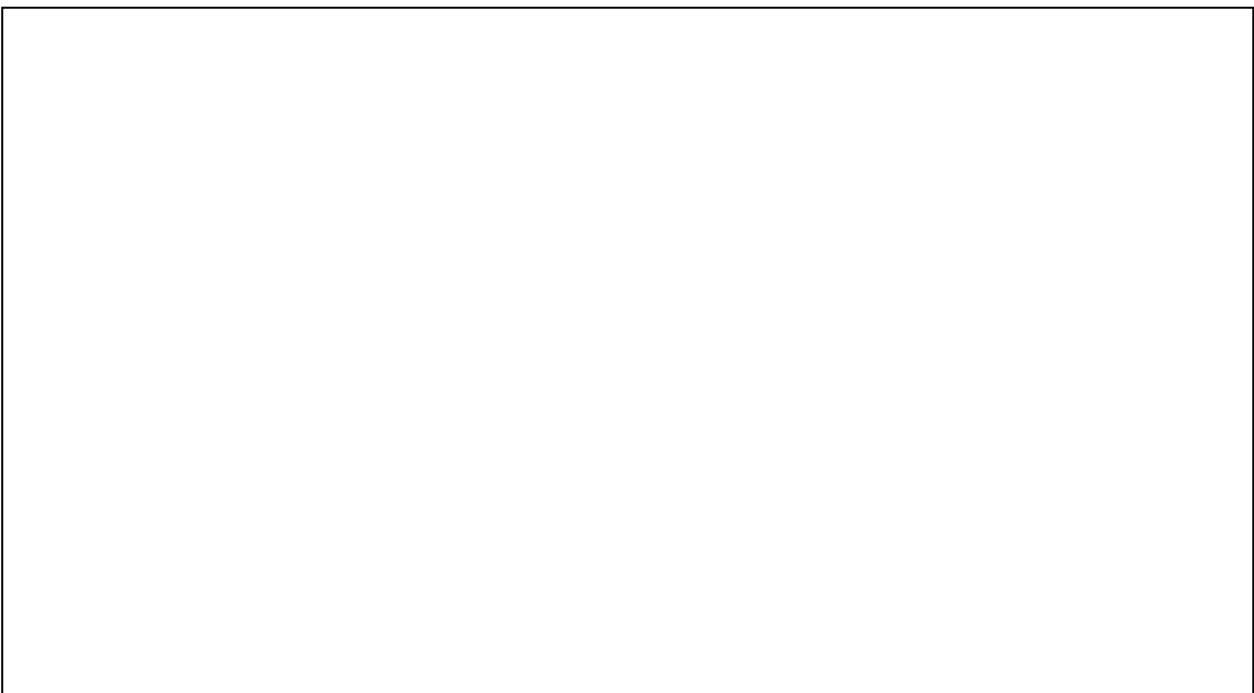
Not all domestic students apply through the UCAS system. There are some who apply direct to universities, and there are a few small higher education providers who do not use UCAS at all. In the case of mature students, we would not want to prevent providers from recruiting them directly, if that makes most sense for them.

4. International students are not currently in scope of proposed PQA for a number of reasons (international exams work to different timetables outside the UK, many international students do not apply for UK courses via UCAS and international students require additional time ahead of term starts to apply for/be granted visas etc). Do respondents agree this is the correct approach given circumstances? If not, what are the key reasons as to why international applicants should be included in scope?

- 5. Please provide any views that you have on treating applications from students who do not currently apply through UCAS, and in particular whether a move to a PQA system would imply changes in how applications from non-UCAS applicants are considered.**



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



Public Sector Equality Duty (PSED)

The full PSED assessment can be found on the consultation host page.

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).

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