

Post Qualification Application to HE PQA final response

1. On a scale of 1-5 (where 1 = highly dissatisfied and 5 = highly satisfied), how satisfied are you with the present admissions system? **3**

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 – The CDI is in favour in principle. However, it would require significant changes to make it work effectively. This would require a commitment to both change by the powers that be and to students remaining front and centre to any changes. The latter is crucial in the light of findings published by UCAS - PQA would be contrary to the preferences expressed by young people - *'In our engagement with students, over 70% said they would prefer to apply to university before they sat their exams or got their results, with the majority saying this would give them longer to make life-changing decision.'* (<https://www.ucas.com/file/440906/download?token=xYT93dPW>)

Other considerations include the preference expressed by government to avoid affecting teachers' statutory terms and conditions, and maintaining the integrity of exam marking if results are pulled forward. (Using AI could significantly shorten the turnaround of exam results but this is some way away yet.)

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.

The CDI support ruling out this model

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**

It is not clear how such a reform would address the concerns raised in the consultation:

- The need for a system of admissions that is less complex and easier to navigate
- Ensuring that applicants have the necessary information to make an informed choice

- Discouraging applicants from selecting an offer that is not in their best interest
- Have sufficient knowledge to work the system to their advantage – so ‘*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, Sutton Trust 2017)
- The commitment to fairness, quality of learning and teaching, and access

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?*

Bringing Level 3 results forward to the end of July would

- Reduce the time available in the curriculum to cover the course content. Level 3 course could begin in the last term of year 11, prior to GCSE results although this would raise its own issues
- Defer the completion of the UCAS application, references and personal statement. These could be prepared on where one anticipates applying, subject to results although this would be no improvement on the current process
- Place additional pressure on all at the end of the academic year. To address terms could be extended although this would require changes to Departmental learning hours guidelines and potentially employees’ terms and conditions
- It would cause a last-minute scramble to select and arrange under-graduate accommodations and secure student loans
- Detract from any extra curriculum learning or work experience opportunity

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.

The Post Qualifications Admissions Reform consultation document raises a number of concerns. This includes applicants not having the necessary information to make an informed choice, increasing the likelihood that they will make poor decisions, which could lead to poor outcomes. The one key piece of information they lack is confirmation of their exam grades. The necessary information to make an informed choice extends well beyond this. Applicants need career guidance support to enable them to identify possible career pathways, they need an understanding of themselves and of the range of opportunities available to them, decision-making skills and sufficient knowledge to navigate the transition system. The acquisition of this knowledge, understanding and skills is not reliant on when exam results are published. Rather it is dependent on school and colleges giving careers education and guidance priority and being in receipt of funding to enable such activities throughout the level 3 programme of learning, including access to a qualified careers professional.

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?*

It is important that all young people, especially disadvantaged groups and students with disabilities, mental health issues or other special needs have access to personal career guidance

from a qualified careers professional able to support, enable and empower them in making the right choice. However, while those in Scotland, Wales and Northern Ireland have access to an all-age careers service, in England, young people only have access when the school pays for it – despite what the statutory guidance says - and this service is patchy. Moreover those not in education or home schooled - potentially those most in need - are excluded from careers information, advice and guidance provision.

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

No comment

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 However a centralised UK-wide system is better able to ensure fair and equal access. The proposed changes to the system do not prohibit the use of unconditional offers.

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

Yes

No

Not sure

If yes, what limits and why?

Having a limited number encourages the applicant to focus down and identify their preferences. They should however receive support to enable them to identify the courses to which they are a better match and to research those that are best for them.

It also enables organisations/HEIs processing the application to estimate the number of applications and hence better manage the process.

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

N/A

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

The proposal does not extend to consideration of the wider factors integral to the successful transition to higher education, such as securing accommodation and the student loans application system.

The consultation documents also implies that if applicants made their choice of course/university following receipt of their exam results, disadvantaged students would be more likely to apply and secure places at the most selective courses/universities. This assumption considers only qualification 'match' and ignores other factors known to influence choice, such as family expectations and location.

Whatever application process is adopted, there is agreement that young people need support to understand the system, and access to careers information, advice and guidance (CIAG) so they

are aware of all options and able to make informed decisions. Crucially none of this is reliant on the publication of exam results and while not directly involved in the delivery of qualifications, professionally qualified career advisers are well-placed to offer this support.

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.

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

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.

The response from the CDI would be the same as expressed in Model 1 - Question 1.

2. Please provide your views on the support applicants will need to make their applications to Higher Education under this model, and do you have views on when and how this could be offered

The response from the CDI is the same as in Model 1- Question 3

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

The response from the CDI is the same as in Model 1 - Question 4.

4. Please provide your views on how students could make choices on which courses and institutions to apply for under this model. Your answer could reference the use of ongoing assessment, mock exam grades and prior attainment (e.g. at GCSE).

As under any model, students would benefit from the provision of careers education and guidance with access to a qualified careers professional. As well as supporting them to make well-informed choices, this would enable them to understand the relevance of their education to their career plans or vocational identity and the longer term impact of assessment and exam grades.

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

Not sure. It may increase the complexity for those applying medicine/dentistry/veterinary science or Oxbridge. Also, those making direct application (e.g. drama and dance) alongside university applications. In most instances, a centralised UK-wide system is better able to ensure fair and equal access, although it seems the proposed changes to the system do not prohibit the use of unconditional offers and the issues arising from this.

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

Yes

No

Not sure

If yes, what limits and why?

The response from the CDI is the same as Model 1 - Question 7.

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

N/A

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

N/A

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

9. Please provide your views on the support students will need to make their applications to Higher Education under this model, and do you have views on when and how this could be offered?

Students will (like under the current system) need support to assess any offers they receive and to determine which is in their best interest to accept. Although an important deciding factor, choice of course/university should not be reduced to the matching of qualifications alone, issues of career ideas, career paths and progression routes, together with personal lifestyle preferences also need to be taken into account. Further support will also be necessary should no offers be received, alongside guidance on what happens next under any new PQA system.

Students will also require support to finalise arrangements over student loans and in navigating university student accommodation systems. For care leavers, those with special needs and any person on state benefits this can be a complex process involving a number of professionals.

To provide the support students need will require teachers, professional careers advisers and university admission tutors, all to be available outside of term-time and for a substantial period of time compared with the current arrangements of elected school/college personnel being available on results day. Subject to the period of availability required, some teachers may need to have their terms and conditions amended, likewise, those careers advisers employed on 'term-time only' contracts. It will also impact on guidelines on the taking of annual leave for university admissions personnel, and many academics, available under the current system, will not be available for advice or consultation.

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

The CDI would refer the reader to comments made under Model 1 - Question 9.

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.

For as long as government chooses to overlook the contribution of career professionals to support, enable and empower young people to make life-changing decisions and successful transitions, the lack of investment in the role they play in schools, college and higher education will continue. A Careers Guidance Guarantee: Every young person should have the guarantee of access to personal guidance from a professionally qualified careers adviser. Under PQA, the

importance of this increases as pressure on students to secure a place within a shortened window of opportunity could easily obscure selecting the best choice for them.

If examination dates are brought forward schools and colleges will be required to address the amount of content within a shorter time frame. Therefore, examinations bodies should be consulted over the subject content covered within the programme and the assessment.

The educational sector would need to engage in a cultural shift away from an expectation of there being 'a summer break' and a recognition of additional pressure in the later summer term over a more sustained period, especially on those supporting transitions to higher education.

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

Yes

No

Not sure

Please provide a reason for your answer.

The personal statement provides an important opportunity for the applicant to explain the reasons for their interest in the course and the steps they have taken towards being able to study their chosen subject at a higher level. It is a means by which they can provide a more rounded picture of themselves, highlighting aspects of themselves that are relevant to the choice of study but perhaps not evident from their qualifications alone. It is a place where they can explain any extenuating circumstances that may have affected their performance or contributed to their choice or career ideas. Such factors can enable admissions officers to select between two otherwise equally suited applicants. Constructing the personal statement also enables the applicant to reflect on themselves, their achievements and gain a stronger sense of self and their commitment to the chosen course of action.

Correct spelling and the grammatical structure of the personal statement are important factors. However, these should be addressed in the preparation of the statement, not give cause for it to be removed from the application process. Moreover, it provides experience of writing about oneself succinctly, clearly and accurately - an essential skill for successful employment applications and entering the labour market.

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.

For as long as higher education institutions require certain grades or a specified number of UCAS points, schools and colleges will provide grade predictions to guide students. This is so they are able to access their current situation against a future goal, the extent to which that goal or opportunity matters, the likelihood of it being achievable and to decide what steps they should take to attain the goal.

Students currently outside the UCAS system

As international students, part-time and mature students fall outside the scope of the PQA and I am not aware of the PQA having adverse impact I have not responded to this set of questions.

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).

Steps need to be taken to ensure the reduced timeframe does not adversely affect applicants with particular support needs by reducing the opportunity to share these with those involved in the transition, allowing chosen universities and colleges to identify their support offer, and enabling applicants to make informed and considered decisions about which best meets their needs.

Questions for Schools and Further Education Colleges / Questions for Higher Education Providers / Questions for Awarding organisations and HE sector agency bodies (with a statutory, regulatory or service delivery function)

The questions in these final sections are specifically addressed to schools and FE colleges, HE providers and Awarding Bodies, hence, I have not responded on behalf of the CDI –. They are not included in the consultation document publication and appear only on the online response facility