Government consultation on Post-Qualification Admissions Reform

Response of the Association of School and College Leaders

A. Introduction

1. The Association of School and College Leaders (ASCL) represents over 21,000 education system leaders, heads, principals, deputies, vice-principals, assistant heads, business managers and other senior staff of state-funded and independent schools and colleges throughout the UK. ASCL members are responsible for the education of more than four million young people in more than 90 per cent of the secondary and tertiary phases, and in an increasing proportion of the primary phase. This places the association in a strong position to consider this issue from the viewpoint of the leaders of schools and colleges of all types.

2. ASCL welcomes the opportunity to contribute to this consultation.

B. Key points

3. ASCL believes that the present admissions system has failures that need to be addressed. These include the misuse of unconditional offers (particularly 'conditional unconditional' offers), the lack of transparency around actual university entry grades (as opposed to offers), the unintended bias that can arise with predicted grades, and the inaccuracy of predicted grades. Often these issues result in the most disadvantaged students being most affected.

4. If the issues above were addressed, then there would be much less need to reform the admissions system. However, we are not convinced that this will happen. Given this, we are in favour of a more radical form of the system.

5. ASCL is firmly against Model 1 as it does not offer the opportunity for students to be properly supported through their application process. The most disadvantaged students would most likely be the ones who are failed through this model, for the reasons outlined in our responses below.

6. We prefer Model 2 to Model 1, as it allows for better levels of support for students in making their applications. However, there are a number of issues and concerns with Model 2, which are addressed in the responses below.

7. ASCL believes that the alternative model proposed by UCAS is worth serious consideration. The main advantage is that students would have less chance of making 'wasted' applications. However, the UCAS model 'allows' HEPs to reject applicants, and we have concerns about the transparency around that process. As the UCAS model is not included in the consultation we are unable to explore it in more detail here, but we have referenced it below where relevant.

8. ASCL is not in favour of major changes to the academic year which would result in less learning time for students. Any changes to the applications process timeline should result in *more* time for student learning (e.g. by saving time on personal statement writing), rather than less.

9. We are concerned by any model that puts more pressure on school or college resourcing during the summer months, which may be necessary to guide students with their applications process. This increased staffing must be funded on top of existing 16-19 revenue funding; otherwise students from more disadvantaged backgrounds will end up with less support. The issues of funding and training for staff are addressed in the responses below.

C. Answers to specific questions

Initial questions

Question 1: On a scale of 1-5 (where 1 = highly dissatisfied and 5 = highly satisfied), howsatisfied are you with the present admissions system?

10. 3/4

Question 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?

11. A marginal yes. On balance ASCL would like to see a change to the present model. This is mainly because of the problems around unconditional offers, 'reduced if firm', 'offer high, accept low', the inaccuracies of predicted grades, the lack of transparency around university actual entry grades and the way that personal statements can disadvantage those students who do not have appropriate support to complete them.

12. However, we urge caution around a proposed move from a system with known problems (which could and should have been solved already without a move to PQA) to unknown problems which may widen the disadvantage gap.

13. We are not in favour of Model 1 because it does not allow for students to be supported appropriately by schools and colleges (especially for the more disadvantaged students who need this support the most).

14. Our members are split between Model 2 and the model proposed by UCAS (where rejections are allowed). The UCAS model would prevent students putting in 'wasteful' choices, but we are not fully convinced that universities would always be transparent about their reasons for rejection, possible keeping quiet about rejections until results are out.

Over-arching question

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 do not 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).**

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

15. The issue that concerns ASCL the most, from the list above, is if there were to be a
    considerable gap between the end of school/college and the start of university.

16. However, we believe this is an issue that can be resolved and therefore it should
    not, in itself, rule out consideration of the adoption of some form of new model.
    However, we consider this a major obstacle to Model 1.

Questions for Model 1

**Question 1: Do you think this system would be better than the current system,
worse, or no significant improvement?**

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

17. There was virtual unanimity amongst ASCL members consulted that Model 1 is far
    worse than the present system.

18. The major fault with Model 1 is that students would receive less help and support in
    making their choices. This is more serious for the more disadvantaged students who
    may not have that support from family and friends.

19. Even if there was support beforehand in making a long-list, there is always a danger
    that once students leave school/college they will disengage with the process, possibly
    due to having started summer jobs or being deflated by their results. Again, this is likely
    to have the greatest impact on more disadvantaged students.

20. There is also an issue around the greater level of staffing that would be needed in
    schools and colleges if students were effectively starting the application process fresh
    after they received their results. It is highly unlikely that schools, in particular, would be
    able to provide the necessary resources for this process (unless there were radical
    changes to the STPCD).

Question 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?

21. ASCL does not see any feasible way to facilitate a Model 1 PQA process starting at the end of July. In addition, we would be very concerned about the likely loss of teaching and learning time necessary to start examinations earlier. This is likely to disadvantage the most vulnerable students the most, who need teacher contact for as long as possible. It also cuts short the education of those who may not be continuing to HE (who need as long a Year 13 as possible).

Question 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 <u>before</u> they receive their Level 3 (A Level and equivalent) result?

22. As mentioned above ASCL does not think that the right levels of support could be put in place for Model 1 to work – either before or after results. A great deal of time and effort could be put in beforehand, but this could be completely wasted if students' results were different from their expected results. In addition, all the preparation beforehand is wasted if students disengage over the summer (which they are more likely to do under Model 1). This could mean a high probability that less privileged students will not progress to any HEP, let alone to their 'best possible' option.

23. The right advice at the right time is crucial, and the role of teachers and careers advisors in guiding and advising students cannot be overestimated. This applies particularly to the more disadvantaged, who tend to have less home support and so, consigning this to August during the school holidays, is going to drastically reduce teacher involvement just when it is most needed.

24. It needs to be remembered that students who have finished Year 13 have physically and psychologically left secondary education. Many, especially the more vulnerable and those with summer jobs, are unlikely to spend much time in school or college, even if teachers are there. The process might continue into September but by then, the school or college should be concentrating on starting the year off for the new Year 12s and Year 13s, rather than on those who have left.

25. Therefore, funding would be needed to provide careers advisors dedicated to this PQA group from late July to late September (and even then, it may be difficult to source such 'temporary experts'). There is a very real shortage of high-quality advice at the moment, and those working in the state sector typically have a huge caseload over an extended period. PQA relies on a very intensive input which only the most privileged will have. PQA makes the general load less but makes the needs of some students far greater than with the current process – due to the intensity of activity throughout the system.

Question 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?

26. ASCL believes that Model 1 is far more disadvantageous than the present system to students in the above categories. Disadvantaged students and those with mental health or SEND needs are likely to require as much help and support from staff as they do under the current system, but will be faced with a constricted timescale in which to seek help and make decisions. It is unclear what would be gained by the changes proposed for this group, other than them being able to make their choice of HE institution and course on the basis of actual results.

27. Additional factors to be considered in relation to potential effects on disadvantaged groups and students with disabilities, mental health and other special need include the availability of staff to support disadvantaged groups and students with SEND during the application and offer stages; and the timescale within which students have to make choices, view institutions and select courses. The opportunities for students to make changes to their career choices, courses and institutions must be made more available rather than less.

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

28. ASCL believes it would be extremely difficult to accommodate entry tests, auditions and interviews under Model 1. This is mainly because students may be more likely to prioritise their studies than their university application. Making the effort to research and apply for those types of courses, when other courses have fewer additional hurdles and can wait until after results day, will mean many will quite simply not bother. It would mean that students may not apply for the types of courses that need tests, interviews, etc. – and again it is more likely to be the more disadvantaged students who miss out.

29. Unless the interviews and tests are all going to take place in August (where there would be issues over invigilation and its cost) there is an illogicality built into this system. Some courses will have to have had pre-tests, which implies some form of previous application. If so, this will enable some universities to pre-select, even if they do not announce the decision until later. This is likely to disadvantage those less knowledgeable about the system or less confident, so the result may be greater, rather than reduced, unfairness.

30. There may also be a strategic expansion of additional testing, which favours the most privileged to secure intake numbers and plan ahead.

Question 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?

31. This could effectively split the application process into two stages, i.e. applying for those courses that do have interviews, tests and auditions, and those that do not. This could lead to more direct applications to the universities rather than needing to engage with

one centralised service such as UCAS. Bypassing UCAS then opens up more opportunities for malpractice, such as incentivised offers.

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

- ■ Yes
  No
  Not sure

If yes, what limits and why?

32. The present maximum number of five seems sensible to the majority of ASCL members.

Question 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.

33. We are not a higher education provider, but we are concerned that a move to hasty, grades-based decision making will lead to poor matching and increased drop-out.

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

34. This is an extremely simplistic model, which would lead to significantly worse outcomes than is currently the case. Providing high quality support on the scale required would stretch the resources of the best resourced parts of the independent sector, let alone the rest of the sector (which is over 90% of applicants).

Questions for Model 2

Question 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.

35. ASCL believes that, on balance, Model 2 could be better than the present system. However, it should be noted that many of our members also believe that the present system could be an even better solution – if the flaws mentioned in the 'initial questions' section were addressed.

36. Potential benefits of Model 2 include reducing undermatching by raising aspiration levels of the HE choices for the most disadvantaged students (although ASCL does have some reservations about the focus on higher tariff universities necessarily being 'better'); less focus on predicted grades (which can cause considerable angst as well as being very time consuming for teaching staff in schools and colleges); and potentially removing the need for personal statements (which are also very time-consuming, of dubious benefit in many cases and can often be more advantageous to those students who receive the most support).

37. The biggest implementation challenge would seem to be ensuring adequate staffing and resourcing in the summer months. Additional funding will go a long way towards resolving this issue, e.g., by enabling schools and colleges to employ dedicated careers/HE/support staff, or to pay overtime to teaching staff. However, the

timescale involved here will limit the support available unless there is a significant programme of staff training.

38. There is also likely to be an increase in appeals against results. This is expensive, which means that those who can afford it will benefit the most, thereby potentially further widening the attainment gap.

39. The distorting pressures on predictions created by the current market system are removed in this model, e.g. 'offer high accept low'; the chance of securing an aspirational first choice with the insurance safety net; unconditional offers; and pressure from students and parents on predicted grades since the removal of the AS. However, accurate predictions are still needed as without predicted grades applicants cannot make sensible or reasonable choices, and many may play safe and aim low (particularly the more disadvantaged).

40. As HEPs will not know their WP applicants as well as under the present model, they will be unable to develop relationships with them and encourage their application. WP activity will be restricted to a postcode lottery with inappropriate options and cold spots. This could result in more vulnerable applicants applying to safe, lower tariff options, staying more local and possibly making less advantageous choices.

41. There could well be a spike in uncertainty and anxiety over the summer months without the available mental health support.

Question 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?

42. Our views on the additional support issue are covered in our response to Question 1 above.

43. Support for researching applications is already fairly well addressed under the present system and, while there is no particular reason why this should be any worse under Model 2, it must be remembered that the current calendar of UCAS deadlines spreads the load of IAG over a longer period (so that a small team with specific expertise can support a whole cohort). However, as there is no dedicated funding within the 16-19 funding formula (ever since the government explicitly removed the enrichment element), schools/colleges presently provide varying levels of help depending on how much of their own revenue funding they can provide for this purpose, or the extent to which they can receive help from external support agencies.

44. The support on choices requires accurate predicted grades from subject teachers and knowledge of the grades required for entry. Historic patterns are useful, but an applicant's perceived chance of admission also depends on swings in application numbers chasing places on a national scale. Students are likely to try to play safe, but that swing also increases uncertainty. We are familiar with this in applications to Oxbridge colleges, but in that case the universities are able to put in a fair reallocation process. There is no proposal in here for anything similar.

Question 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?

45. Some students with certain needs have access to a dedicated classroom assistant or support worker (sometimes as part of their EHCP). The logistics and funding arrangements for having this similar level of support in the summer months (and maybe even September and October) need to be considered.

Question 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).

46. Students under Model 2 would reference the same factors that they presently use, such as mock grades, assessments and staff guidance. However, students will still need predicted grades (or target grades). What would be of great benefit under this model (and indeed would enhance the present system) would be for UCAS to publish the full university entry grades of previous cohorts (excluding 2020 and 2021) to applicants (it is presently only available to advisors). The opportunity to curate choices (particularly if clear rejections are published) as their attainment trajectory becomes clearer would support the late developers picked up in the Sutton Trust evidence which is driving the lobbying for reform.

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

- Yes
- ▪ No
- Not sure

If yes, what implications and why?

47. In this model there remains a concern over the behaviour of HEPs in contacts with applicants, especially outside the UCAS system.

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

- ▪ Yes
- No
- Not sure

If yes, what limits and why?

48. Again, the maximum number of five, as at present, seems about right to the majority of ASCL members. Students need some ranked reserve choices, which would be useful in not overburdening the process with delays caused by having to contact unsuccessful applicants for further options.

Question 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.

49. ASCL is not a HE provider but is concerned that applications could be processed badly if HEPs try and process a large volume too quickly.

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

50. We believe that these should be conducted as per the present system. While we recognise that transparency over holistic decision making is difficult, there does need to be transparency over 'subjective' decision-making aspects by universities, e.g. in the auditions and interviews (as opposed to tests). If UCAS only sends out partial details, e.g. just exam grades, to HEPs then widening participation will suffer. HEPs need as much information as possible on individual student achievement and contextual background.

51. If UCAS sends out all choices to HEPs in the spring, as opposed to October as at present, then subsequent test preparation would interfere with A level preparation. As mentioned previously, this may mean many able students may not select some of the most aspirational choices in order to focus on their A levels or other courses.

Question 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?

52. Support arrangements should mirror those presently on offer in school/colleges, i.e. as a structured part of the sixth-form study programme. The biggest implementation challenge would seem to be the adequate staffing and resourcing necessary in the summer months. As mentioned previously, additional funding will go a long way towards resolving this issue, e.g. by enabling schools and colleges to employ dedicated careers/HE/support staff or pay overtime to teaching staff (although less funding would be need for this than in Model 1).However, the current cohort of qualified IAG staff is not sufficient to match the increased demand if all students are to receive even the current level of support.

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

53. As indicated above, while we are tentatively warm to this model, we have significant reservations about potential unintended consequences. Significant work is needed to identify these and consider how they could be mitigated before such a major reform is implemented. Without further research and trialling, the danger is that a move to a grades-based system could end up being more unequal than the present more holistic application system.

Further questions

Question 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.

54. It is essential that any reform does not lead to the loss of learning time, which would be the inevitable result of moving exam dates forward by any significant amount. An absolute maximum of two weeks feels acceptable to some members, especially if time was saved earlier in the year from a slimlined application process.

55. The issue of when to plan to incorporate interviews, auditions and portfolios is complex. These clearly need to be built into the application process in an appropriate way. Most ASCL members feel more consultation on the timings for this part of the process would be welcomed, as a second stage consultation, if the core concept of PQO was agreed. Different models could be considered, e.g. medical/veterinary, Oxbridge and auditions/portfolios during the autumn term; and a shorter, sharper expression of interest stage during the first half of the spring term for all other applications.

Question 2: Should personal statements be removed from the application process?

Yes
No
■ Not sure

56. ASCL members have a divided view over personal statements.

57. ASCL accepts that an applicant's school type, and the amount of support that the school provides, is likely to be a key predictor of the quality of their personal statement, with those from more advantaged backgrounds more likely to receive support and guidance. We acknowledge the logic in the evidence that 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.

58. Personal statement writing also take up a lot of staff time, sometimes with numerous to-ing and fro-ing of versions between students and staff. It can divert much-needed teaching time. It is also often perceived as something of a lottery as to which universities and courses actually give weight to the statement.

59. However other members feel that the personal statement is an extremely valuable exercise. It forces students to think seriously about their course choices and encourages them to research around the course, to consider their own strengths and weaknesses and even to undertake voluntary work or work experience.

60. If personal statements are to be retained for some, or all, courses then their purpose needs to be more transparent, e.g. how much weight is actually being given to them as part of the overall decision-making process?

61. There should also be greater transparency over what is expected in the statements. If there is sufficient commonality then replacement with a series of more structured submissions may be appropriate.

Question 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.

62. It should be remembered that predicted grades are not being removed from the whole process. The vast majority of schools/colleges will have some form of target-setting process, whereby students have a target grade for their A levels or other level 3 qualifications, based on prior attainment, assessments and mocks. Students will still have internal target grades, but these would not be shared with HEPs for use in decision-making. Students will still need these target grades to make choices. Therefore, the removal of predicted grades from the process should not have a major impact on the guiding of students in their choices.

63. Bearing this in mind, ASCL members had mixed views on the use of externally shared predicted grades, but overall, the majority view was that were not absolutely necessary. The loss of AS grades is seen as a major stumbling block in students being able to choose suitable tariff courses and as a mechanism for providing the basis for the more accurate predicted grades pre-2010.

Question 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 applyfor/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?

64. ASCL has many members who work in FE colleges running HE courses, and this includes international students. The primary reason for not including international students in scope is because international students do not currently apply for UK courses through UCAS, and they need more time to apply for visas. As with mature and part-time students, international students need a different route to access higher education. The proposed system does not improve the process for international students and they need alternative routes to applications and offers. Given these parameters, the present approach, referred to above, is considered the correct one.

Question 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 toa PQA system would imply changes in how applications from non-UCAS applicants are considered.

65. ASCL does not have any further views on this.

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

66. No further comments.

Public Sector Equality Duty
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).

67. No further comments.

D. Conclusion

68. I hope that this response is of value to your consultation. ASCL is willing to be further consulted and to assist in any way that it can.

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13 May 2021