

DfE PQA Consultation

12th May 2021

About GuildHE

GuildHE is an officially recognised representative body for UK Higher Education. Our members are universities, university colleges and other institutions, each with a distinctive mission and priorities. They work closely with industries and professions and include major providers in technical and professional subject areas such as art, design and media, music and the performing arts; agriculture, food and the natural environment; the built environment; education; law; health and sports. Many are global organisations engaged in significant partnerships and producing locally relevant and world-leading research.

Consultation Questions

Overview (Page 17 of consultation)

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

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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:

We would firstly like to point out that the language and construction of this question is problematic as it overlooks the current admissions approach we have which includes elements of post qualification choice and admission. No student gets a guaranteed place on their course until they get their exam results (unless they are given an unconditional offer), and the expansion of the use of clearing and self-release has enabled students who wished to apply later, or to change their minds after applying through the standard route to do so. Whilst we recognise the issue of the validity of teacher predicted grades, the two proposed models would have detrimental effects to the fairness of the whole admissions system. The UK admission system is founded on the principles of an equal consideration model. At present all applications received by the January (or October) deadline are seen in their totality, and enables HE providers to see the full spectrum of applicants and make fair offers accordingly. This enables institutions to take time to undertake additional checks for WP students to offer a fair contextual offer, and for

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courses where applicable to shortlist, interview or test in additional ways. Neither PQ model consulted on by DfE would have the ability for equal consideration to take place and this could have disastrous consequences for WP students, especially when competition increases for places after the slump in 18 year olds in the population.

We agree with the government and the regulator that the use of unconditional offer making in the admissions processes has become increasingly problematic in how HE providers are responding to the construction of a consumer market - especially conditional unconditional offers or incentivised offers. However there are a number of legitimate reasons for offering an unconditional place, such as the applicant passing an interview/audition and or the applicant has additional mental or physical needs which have been discussed with the university during the admissions process. There are also pre-arranged agreements with feeder Colleges and Schools to consider as part of the institutions APP which does guarantee a student a place at a provider. They are also used by small and specialist institutions as part of their contextual offer making practices, recognising that disadvantaged students may not have the expected academic qualifications, but are capable of succeeding on the course. If the Government intention is to 'crack down' on unconditional offer making, then we do not think that an overhaul of the whole admissions timetable is the best way to achieve this aim.

Moving the timeline so that a student does not even know if they have an offer to attend university until 2 months before term starts will have significant emotional and financial consequences for all students and in our opinion will increase inequality in the admissions system and drive unwanted and unscrupulous recruitment practices underground. Furthermore, applicants currently have the option to start or modify their university choices during clearing after they have received their actual exam results, however evidence shows that students who apply through clearing often do not make the best choices, and many more drop out or change courses than those that have taken their time to go through their options using the standard route. We have an exceptional success rate in student admissions, with the vast majority receiving an offer at one of their 5 choices, and being accepted into their first choice. Of course as more 18 year olds enter the applicant pool, competition for places will increase. However we feel that HE providers will need more time to make fair offers to students - not less as is proposed in this consultation.

Our responses to subsequent questions within this consultation will detail why the evidence shows that a PQ process as defined by this consultation will only benefit a small number of disadvantaged students, and does not take account of the structural inequalities within our society which significantly contribute to unequal educational outcomes for students of different backgrounds. It is not just teacher predicted grades which disadvantage some students - but OFQUAL have admitted that A Level results are not a robust measure of actual achievement (where they can be 1 grade either way). IAG is also disproportionately distributed in the school system, and students from private and high performing state schools will always have an advantage in navigating the HE admissions space compared to non-traditional/ POLAR 1-2 students.

We agree with the consultation that some disadvantaged students "undermatch" based on receiving inaccurate predicted grades, but this does not tell the whole story, nor does it recognise the high levels of self censorship many WP students show in the application process. The vast majority of students want to

'fit in' to their university, and for all sorts of reasons some WP students do not feel comfortable/confident in applying to or attending elite institutions. We can do far more to break down these barriers through our access and participation work, but cultural and social norms play a significant part in student choices - not just whether their grades get them into the highest tariff institution they can. Furthermore, for some students the content of the course or the student support on offer is more important than the prestige of the provider, and we must respect that elite institutions are not always the best fit for some students.

We would also like to highlight at this point that the approach to admissions in UK HE has been driven by a number of political and social factors over the last 10 years which has contributed to the current state of play. Not only has the overhaul in Level 3 examination not resulted in closing the attainment gap for young people from lower socioeconomic backgrounds, but successive HE policy changes have encouraged competition which has bred certain recruitment practices in parts of the HE sector which we know can have a damaging impact on student choice and outcomes. This is coupled with the significant reduction in 18 year olds and the removal of student number controls has led to a different dynamic within the HE admissions system which encourages marketisation and the inevitable economically driven behaviours (such as increasing market share) which go with this ideology. There is no single market operating in English HE but rather several markets, sometimes overlapping. These include a national/international market where an elite set of providers use their research prestige and 'good outcomes' data to create barriers for access to disadvantaged students from non-white and non affluent backgrounds and a number of more local/regional markets where applicants choices are driven more by their sense of the right course and the right university for them. There is little if no evidence that all applicants make rational choices based solely on public information and provider ranking - instead students look at a variety of things including whether they feel they fit into the culture of the HEI, if the course content is what they are interested in, and how far away it is from their home. This is why we need to ensure that applicants have lots of time to think through their choices, visit institutions and build relationships before they make their final decisions.

It is also important to note that whilst at present the HE recruitment market is wide open with plenty of places available for students, the demographic and demand of students are changing. As well as the current resurgence of mature learners into the system during covid, we are about to see a substantial increase in the number of 18 year olds, who have all been promised the option of going to university if they are academically capable. In reality, higher education may not be able to grow sufficiently to accommodate this increase in numbers, and/or there may be a political desire to restrict student numbers in some way. So when looking at reviewing admissions we must be mindful that the next 10-20 years will not be like the last. There will be increased competition for places and a significant risk of lost learning opportunities for young people. One could argue at present it is a buyers market - with plenty of choice available for students regardless of their background. This may not be the case in 5 years time, and we worry that a PQ model will push negative admissions practices underground and will further complicate and conceal the 'hidden rules of the game' to accessing elite providers. Our members have provided us with an initial list of such undesirable behaviours which would be able to flourish and go unchecked by the OfS if either of these models were implemented and they are shared with you in the appropriate section of our response.

UK HE is truly unique in the world. Not only does it have some of the world's best research universities, but it is a sector made up of diverse institutions of different sizes and missions. Just in England there are over 400 HE providers on the OfS register who range from large multi-faculty institutions with over 30,000 students to smaller or specialist institutions who may only have 50. We have providers that specialise in delivering a highly technical industry relevant student experience, as well as those whose values are based on faith, community and equality. We should be proud of the dynamic HE sector we have created, but this poses challenges in how we provide information, advice and guidance to prospective students and help them find the right course at the right institution for them. PQA works in countries where there is not this diversity of choice, and where students tend to go to their 'local' HEI. The academic research on students from disadvantaged backgrounds already shows that these students are less likely to travel far away from home to study, we would not want our admission system to force this decision on them through necessity of having to decide quickly, especially when there was an emerging accommodation crisis before Covid-19 took hold in the UK. We cannot underestimate the importance of students choosing a provider where they feel safe and welcome, and where they know they will have an affordable place to live during their studies.

GuildHE and its members would like to see reform in HE admissions where universities are less reliant on teacher predictions, where recruitment tactics that negatively affect students are discouraged and/or banned, and where students who have the potential to be admitted into university are confident to do so, make aspirational choices and know about the variety of HE experiences on offer. We do not however think either proposed PQ model does this, and in reality will in fact have the opposite effect on disadvantaged students having equal access to the providers they wish to apply to.

3. PQA Delivery and Implementation: If you think these issues should not rule out consideration of the model above, please explain why, providing supporting evidence where possible.

We do think these issues rule out a PQA model where the term starts between Nov-Jan. This would be both damaging to students and institutions in multiple ways.

Questions for Model 1 *(page 20 of consultation)*

4. 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

Any comments:

We do not believe that a 'pure' PQA model would be in the interests of any students. Even if results were moved earlier, it would still compress a process which takes a year to complete into a couple of months.

Not only would the HE infrastructure not be able to support the compression of the timetable to this extent, but neither would school support, nor allowing students enough time to make the right choices for their future. This would affect everything from applying for a student loan, visa etc. to finding accommodation, finding alternative choices if all applications were rejected, attending open days, summer schools, applicant days, preparatory days and pre-sessional classes.

We feel it is important to remind Government that just because a student meets the entry criteria does not guarantee them a place. There are other factors to consider such as classroom space, WP commitments and access to facilities/placements. Admissions decisions are therefore complex and in the interest of fairness to all students, the admission system should be based on a process of equal consideration rather than how quickly an applicant submits their application. With PQA there would not be enough time for a HEI to look at all their applications in their totality and decide who to offer places to, it would be a continuous rolling timescale as clearing is now, and this will heavily disadvantage students from non-traditional backgrounds.

It is also impossible to undertake a personalised and bespoke approach to admission in a PQA timetable. Our members pride themselves on working with applicants to ensure they make the right choices, have the talent and ability to successfully complete their course (and have a flourishing career) and take students with non A-level qualifications. To this end many formally or informally interview/audition students for their courses, and this would be impossible within this proposed timeframe. There are PSRBs that also require us to interview applicants, especially in healthcare, and some HEIs where the sheer number of applicants means that further admissions tests and interviews need to take place to shortlist applicants. This would need to continue in the HE admission system and the only way to do this whilst implementing these reforms would be to have a 2 stage process, whereby courses that needed to interview/audition did so before A Level results came out, and all other courses would process admissions post-application. This, in our opinion, would create further division in equalising opportunities for all students regardless of background, and does not solve the problems posed in this consultation in relation to teacher predicted grades which would still have to be used for these purposes.

Removing the certainty of students numbers until a few short weeks for term starts will also have dramatic consequences for HEI planning and finances. Sessional and part time staff are contracted and timetable and estates management plans are all drafted before September based on applicant numbers. Removing this certainly for providers would diminish the quality of the student experience especially during the first semester, and would create additional financial risk to HEIs.

5. 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?

Whilst we welcome more time to process applicant data, and through the two Covid-19 admissions cycles have welcomed the alignment of Level 3 qualification results day, we do not believe that the proposed timetable movement would give HE providers enough time to make a robust and equal consideration of applicants, whilst also leaving enough time for applicants to know if they have a place and make arrangements for accommodation etc.

Schools definitely do not have the staff capacity to provide high quality personalised IAG to their students after results have come out on such a mass scale, and it would significantly challenge the HE workforce to deliver a timely and smooth admissions process. For small HEIs a squeeze in the admissions cycle is incredibly problematic. Many take a whole institution approach to admissions already, with academics having a considerable say in who is accepted - unlike in large HEIs where much of the admissions processes are semi-automated. We simply do not have the staff capacity to be able to compress 4 months worth of admissions considerations into a few weeks, and employing temporary staff would either not be feasible due the specialist nature of our programs, or would diminish the applicant experience. At the moment we have a workforce of highly qualified admissions staff who understand applicant needs and the complex web of qualifications and prior experience they come with. Shortening the admissions process would dramatically impact HEIs ability to retain these knowledgeable staff as they would only be needed for a few short weeks a year. This would have a dramatic impact on the quality, robustness and professionalism of the admissions process in HEIs.

If level 3 results were brought forward without a PQ model being introduced we think would have significant advantages for all students, and there would be more time for students who wish to release themselves from prior offers

6. 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.

As we highlighted in our introduction, the education system in the UK is complex both at university and school level. To ensure that all students regardless of background have access to appropriate IAG this has to start from an early age (5-7) in order to break down societal barriers and ensure that young people do not make choices early on in their educational life that restrict their choices later. We already see that for some students they are unable to apply to the degrees they want to because of their GCSE and A Level choices. Therefore we have to take IAG as a holistic, progressive activity which takes many years to help young people realise their potential and aspirations for the future. Industry, regional and global opportunities also change, and we must provide our young people with high quality IAG that is adaptable and timely. At present too much IAG is based on the personal experiences of teachers and parents. From speaking to students from disadvantaged backgrounds (especially those who are first in family to go to university) find the IAG they receive from their schools is neither unbiased nor current. Universities through their outreach programmes strive to reach as many students as possible to offer independent IAG but they also are unable sometimes to offer personalised guidance to WP students outside of taking a university route as the next steps out of college.

In an ideal world we would have a holistic approach to IAG where educators and employers would generate content and deliver IAG through many stages of a young person's life, and open to all young people regardless of background. With the current IAG system in place though we believe that moving to a PQ model of admissions would dramatically reduce the ability for young people to access personalised IAG during an important stage in their life. Careers advice for young people is woefully underfunded.

Conversely some young people may already be in a position to get their application ready before the formal admissions cycle starts. These students will either know exactly where and what they want to study, and/or have access to high quality IAG from their school or parents. But these students are in a minority, and the evidence from UCAS and academics about how students decide what and where to study shows that they need sustained additional support and guidance to apply to a university and course that is right for them. Far more students who go through the clearing route drop out or wish to change course which shows just how important it is to maintain an admissions process which gives applicants space to think and the ability to change their mind if necessary. We don't think either of the PQ models being consulted gives enough time for applicants to do this, when additional pressures such as finding accommodation, finalising their student loan entitlement (and DSA if required) and getting ready to move away from home are also urgent priorities.

Schools in either of the PQ models being consulted would still have to provide IAG about the types of HEIs to apply to based on their own assessment of the likely qualifications a young person might achieve at A level. We believe that the removal of coursework and AS levels as a formal part of the examination process has meant that it is much harder for teachers to provide an accurate assessment of a pupil's potential. It also disadvantages certain types of students from being able to obtain the grade which best reflects their ability. If we had an incremental approach to Level 3 assessment it would be far easier for young people and teachers to guide prospective students to realistic university choices. Sticking with the current model of Level 3 assessment and moving to a PQ model would not diminish the need for pre-application activity based on predicted grades. This is especially true for applicants who apply to highly competitive courses where an earlier admissions deadline would need to continue (in for example medicine, veterinary science and performing arts).

7. 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?

For the general student population, the shorter time you give applicants to make choices, the less likely that they will be the right ones. But for students with additional needs or more complex history of educational attainment, it is even more important to enable time for the applicant to assess their options, and their chosen universities to work with them to ensure that they have the ability to succeed on the course. For students with physical and cognitive disabilities it is important to know early on whether the university can accommodate the adjustments required which takes time, often with the applicant visiting the institution and a number of interviews and phone calls with academic and student support staff to ensure that their needs are met when they arrive. Some of these needs may involve changing the

campus estate, or employing specialist support staff (such as sign language interpreters) which again can take a number of weeks to complete.

For students with clinical mental health needs, the HE sector has been increasing their capacity to engage with NHS Trusts to ensure a smooth transition for the students from one support area to another. However, there are still a number of challenges to this, and the Minister will be aware through her Taskforce on Student Mental Health that we are yet to see these partnerships fully operational across all regions of the UK and there are still barriers in data collection and sharing which means that these students would also be disadvantaged if we were to move to a PQ model of admissions.

The HE sector has also been working in its approach to contextual offer making for students who are disadvantaged for other reasons including their socioeconomic status, care experienced young people and refugees. These admissions decisions are more complex and require more time to work with the applicant (and data about them) to determine if they will receive an offer which takes account of these additional factors. We do not believe that condensing the admissions window from 4 months to 4-6 weeks will enable HE providers to run an equal consideration admissions process which takes account of these additional factors which mean an applicant may not meet the advertised entry criteria.

Neither PQ model also gives enough time for any student who is rejected from their choices to find an alternative place.

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

In the opinion of our members who routinely interview/audition applicants it would be impossible within the timeframe provided by the consultation to undertake this professionally and with the students best interest at heart. With that in mind there would need to continue to be a secondary application timeframe to enable interviews/auditions to take place and would mean in reality that it is more likely that students from disadvantaged background would be locked out of elite institutions, creative disciplines and highly competitive courses due to there being less support available from schools and colleges to support disadvantaged students from applying to these early cycle courses. Psychologically having a two tiered admission cycle is a barrier to participation for disadvantaged students who often do not want to be seen to be doing something outside of the normative behaviours of their friends. The current October deadline has this effect on some students, but is somewhat dampened by the fact that the general applicant deadline is only another 10 weeks away. In a PQ model we would still need to have an early applicant route to have enough time to interview for medicine, social workers, performers etc, and this would have to take place at a similar time to now - in order to ensure if applicants are not successful they have enough time to find alternative places. This would mean that for some courses students would apply 10 months before everyone else which further alienates these courses for disadvantaged students. Applicants also benefit from the elongated timeframe on these types of admissions activities as they may have to attend 5 interviews/auditions and undertake additional testing depending on the courses they have applied for. We must also be cognisant that there are a number of private training providers (especially in the performing arts) who do not use UCAS or the 'standard' application timetable. Moving

to a PQ model may force more providers outside of UCAS which will also further alienate WP students from these sorts of courses.

As highlighted in our introduction, for many of our members the admission process is a whole university approach. Academics, administrators, student support staff, external practitioners and WP staff are involved in the cycle. To this end it takes a while to bring these people together and to arrange interviews with applicants and we would be concerned at the additional cost, manpower requirements and subsequent effect significantly compressing the admissions timetable would have on the quality of our assessments of applicants.

GuildHE members would also like to highlight that it is not just for elite providers, PSRB or talent requirements that interviews and auditions are important to the admissions process. Many GuildHE members routinely interview formally or informally their applicants for a variety of reasons including to ensure applicant choices reflect their professional aspirations and to demystify sometimes unrealistic expectations of the professions we serve. As our members are also smaller HE communities we also like to get to know our applicants, and for us to build a relationship with them in order for us to best support them when they arrive for the start of term. We think condensing the applicant window will stop us being able to develop meaningful relationships with our applicants that not only help the applicants make their final choices, but for the pre-sessional support we offer them. It would be simply unaffordable for us to offer pre-sessional activities to non-applicants.

9. 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?

In this model, HE providers would be far more likely to undertake unofficial admissions activity outside of UCAS before they were officially allowed to offer the student a place. This will create additional hoops and hidden rules that students from disadvantaged backgrounds will have no way of competing against more affluent applicants who have access to better IAG from their school and parents.

For institutions like GuildHE members who have a valued based approach to their admissions processes (and take students based on aspirations and potential as well as prior entry qualifications) we would also still want to meet with prospective applicants before the official opening of the PQ cycle. To this end this would become more expensive for us to deliver and would hinder our ability to track who we have engaged with if it was outside of the 'official' application window.

As noted before it may also force some HE providers who must interview/audition their applicants to move away from UCAS and undertake their own admissions processes which will further alienate these courses from students with a lack of access to IAG, or the support to apply to these sorts of courses.

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

Yes

No

Not sure

If yes, what limits and why?

Whilst the best model for admissions is to restrict student choice to 5 places to both enable the applicant to engage fully with their choice providers, and to ensure the process is as efficient as possible for both HEIs and students it would be unfair to place a cap on the number of applications in a PQ process as if they are rejected from their 5 choices they would not have enough time to find suitable alternative places. The current admissions timetable enables those that have been rejected to apply again through clearing which means they know in enough time that they have to start looking again. We are particularly worried that in 5 years time where there is fierce competition for places (and the possibility that the number of courses that go into clearing is dramatically reduced) then applicants who have been rejected will have no choice but to defer or will have been demoralised to the point where they may not apply again. This is especially a concern for disadvantaged students who need additional support during their application process.

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

This is not an easy question to answer and many factors have to be taken into account, including how any equal consideration process would work. GuildHE members do not automate their admissions based on computer algorithms and each application and personal statement is considered by at least one person in every case.

So as not to further disadvantage students we really must need an equal consideration deadline in place around 2 weeks after results day. Providers would then need around 3-4 weeks to process those applications and start asking for any additional documentation or invite the applicant to an interview/audition/test if appropriate.

For courses that have additional tests/interviews ect there would need to be at least a 1 week gap between the invitation and the event to ensure that disadvantaged students in particular are able to prepare and where necessary plan their transport. We must be mindful that train travel is particularly expensive if you book less than a week in advance. Depending on the number of interviews/auditions etc. these may take us 3-6 weeks to complete. For some of our members who need to have multiple rounds of auditions this can take up to 3 months. Once the interview/audition/test is complete we can process the outcomes relatively quickly and provide an outcome to the student.

Where we need to make a contextual offer or it is a more complex application due to a disability or the educational experiences of the applicant we have a number of conversations with them to assess their suitability or how we need to plan for their arrival to ensure the right support is in place for them. For contextual offers this is usually dealt with in our members through an interview, and for those with medical and/or learning needs can take 6-8 weeks to work with the local healthcare trust of the student back home.

In total then for us to offer a professional, robust and fair admissions system that takes account of students with disabilities or who are in some way educationally disadvantaged we believe we cannot process applications any quicker than 8 weeks, but for many of our courses it would be substantially longer with a minimum of 12 weeks but most often 16 weeks. If an applicant was not offered a place based on their 5 choices in a PQ timetable they would not have enough time to seek an alternative course.

The consultation document states “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.”. This, however, does not take account of the fact that we also need to allow time after a student has received an offer to review the offers they have, accept one and then make arrangements to move to a different town/city. Even if HEIs could condense their admissions decisions to 6 weeks we still need to give applicants far more time than 2 weeks before the start of term for term to make their final choice and find accommodation etc.

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

The proposed PQ model does not take account of the need for students once they have received their offers to have sufficient time to make their final choices and make arrangements for their new life away from home. For this reason we have grave concerns that students from WP backgrounds will be forced to only apply to their local HEI, and could also make it harder for first year students to find accommodation in their new town/city. This is because at present local housing stock is based on the number of first year students - with 2nd and 3rd year students filling any gaps in housing or using the private rental sector. Private landlords will not want to wait until a week before term starts to know if their housing places are filled or not, so the accommodation market is in danger of shifting against first year students being confident they can secure contracts. The uncertainty may also inflate the rental costs of private student housing. The student accommodation sector is in desperate need of reform. Students are still being ripped off by private landlords, and there is a shortage in affordable housing for students in many towns/cities. GuildHE members are very reliant on private housing, as the vast majority of our members do not have substantial housing stock of their own. We do not want to see the current accommodation issues further exacerbated by such a substantial overhaul of the admissions timetable.

This timetable will also affect the delivery of our academic programmes in a negative way, especially for students with additional academic needs. It does not give enough time for HEIs to offer pre-sessional training, bridging courses and community building activity which will help students to be inducted quickly

into the academic requirements of the course. This will become increasingly important with the introduction of T Levels and the overhaul of the lifelong learning/BTEC/technical education policy.

Example

Many of our members use the time between January application window and results day to build relationships with their applicants and prepare them for a successful HE experience. A highly successful Facebook group for applicants helps students develop relationships with other students, so that they come to Falmouth already having made friends. DfE should not underestimate the importance of pre-arrival social networking. It takes away lots of the anxieties about moving away from home and setting up a new life in a new environment with new people. With making friends one of the most important factors in student retention, it is vital that applicants are given the time to do this. Something in a PQ model would not be able to exist in a meaningful way. Universities also send out equipment lists to applicants before results day so that they are aware of what is required (some courses a lot of equipment is needed) and there are pre-arrival tasks such as visiting performance spaces, reading and watching that will support their first few weeks of learning.

Model 2: 'pre-qualification applications with post-qualification offers and decisions' *(page 26 of consultation)*

13. 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

Additional comments:

The second PQ model proposed does nothing to address the principal issue of why the PQ model is being consulted on. In this proposed timeline we would still need to rely on teacher predicted grades to ensure that applicants were making a mix of realistic and aspirational choices. All this second model does that is different to the current cycle is prevent applicants from having enough time to make a new application if they are rejected from all 5 choices, prevents applicants from securing accommodation for their first choice provider; and stops HE providers being able to develop timetable plans and finalising staffing needs.

In this model it would not enable applicants who got far better grades than expected to 'trade up' their place, as much like clearing now there would be no places left in elite institutions or oversubscribed courses. It would however put an end to conditional unconditional offer making, which whilst we agree it should be stopped, there are better, less expensive and less damaging ways to do this.

14. 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?

For the most part this approach is quite similar to what we have now in terms of how young people are supported to make their 5 choices, and gives enough time for those that they have applied to undertake the necessary checks, tests, interviews, applicant days etc. However we are confused by the description of the PQD model in this consultation in exactly what part of the 'decision' is being made available after results day.

The consultation states: "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". To us this sounds like HEIs will not be able to undertake the thorough scrutiny of their applicants between the Jan-July window - only for exceptional circumstances and is just another form of PQA. This is problematic for a number of reasons.

Firstly, as highlighted in the consultation we need to have a better understanding of the number of applicants we have in order to plan our timetables and workforces. Receiving arbitrary data on the number of admissions does not do this - we need to have the actual number of realistic applicants to do proper planning. For some of our members over 4,000 students apply to courses where there are less than 50 places. This will also be true in other HEIs that are heavily oversubscribed. Equally though for other providers who may not have such high numbers of applicants, they too need to know whether the applications received are legitimate and if the applicant has any chance of being accepted onto the course.

Secondly, it doesn't help an applicant who has made 5 aspirational choices that they are unqualified for. They would have to wait until August to know they had been rejected which is fundamentally unfair.

Thirdly, withholding applicant information until August still does not give providers sufficient time to undertake the additional checks and discuss with the applicants from non-traditional/disadvantaged backgrounds, nor to offer a more personalised and thoughtful approach to admissions as we have highlighted in our response. The same issues highlighted in our model 1 response are true in this version of model 2. It would still take HEIs around 6 weeks to process an application, leaving just 2 weeks for students to accept their offer and move house.

Fourthly, whilst this approach takes account of the workload for teachers, it does not ease the burden on HE admissions teams, academics or support staff. In the main they would still be forced to rush through admissions decisions in just a few weeks.

Finally withholding applicant data to providers would not enable applicants to change their mind and 'upgrade' their choices once they knew their actual results, and as such also does not help solve the policy problem as set out in the consultation.

It would be better for the applicant if all of their applications were processed in the Jan-July window, they knew which they had been outrightly rejected from and then on results day they knew what providers were more likely going to make them an offer to help them plan for the future choices they need to make. This of course does leave open the opportunity for HEIs to make 'underground offers' away from regulatory body eyes, which is why we do not fundamentally agree this model is worthy of consideration and later on have provided our reasons why we think this will further encourage marketisation practices which work against the student interest.

15. 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?

If this model was to be implemented a number of students' data would need to be unlocked in order for providers to make robust and fair decisions for students with additional needs or from non-traditional backgrounds. For example providers could have access to all applicants who are from POLAR Q1+2 or receive free school meals. In some senses this might benefit WP students who would technically be processed first compared to their more affluent peers, but in the scheme of fairness for all students we don't think politically this would be taken well as it goes against the principles of equal consideration for all applicants.

We would fully support the ability to process applications for students with additional needs and/or disabilities. As we have highlighted in previous questions, we need time to ensure we have the appropriate support in place for students before they arrive on campus.

This model would also partially solve the issue of providers who interview/audition/test applicants to do so within the Jan-July window. However again we feel that there is an element of unfairness to all applicants in this model in that for some they will be actively engaging with their applicant choices during this time and some applicants will hear absolutely nothing for 6 months. We are worried that if providers were able to unlock their applicant pool if they need additional testing this will encourage more institutions to add this on to their admissions process in order to secure applicant information earlier. This is not in the main in the students' best interests and could have negative consequences for WP students who we know are sometimes deterred by additional testing.

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

In the most part the process for the applicant remains broadly the same. As we have highlighted in previous questions we believe that the current state of IAG and approach by teachers to support students from disadvantaged backgrounds is woefully inadequate. We don't see the timetable change proposed in this consultation having any material effect on the quality of support for students, but unlike in model 1, in model 2 it does not make the situation worse.

17. 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?

The timetable does not take into account that there is also an October deadline in place for Medics and Oxbridge and does not comment on whether this deadline would also be asked to be moved in any changes to the standard route model.

We believe that the changes proposed would place additional challenges on some HE providers and will discourage UCAS participation in certain disciplines. It will also make it more likely that HEIs will make unofficial offers to applicants before the unlocking of decisions in July. We don't think this is in the interests of fair admissions, and will make it more challenging for the OfS and other government agencies from regulating against anti-competitive behaviours and offermaking not in the student interest.

UCAS currently has a monopoly on university recruitment. As a private company they are able to make Ts and Cs which restrict some unwanted provider behaviours, but because they are not a sector agency their rules do not necessarily protect the student interest, nor support the regulation of fair admissions. UCAS is also not mandatory, and therefore there are many providers who at present do not use UCAS services. These reforms have the potential to encourage more institutions away from UCAS which will have negative impacts on all students, but will be particularly felt by those from disadvantaged backgrounds.

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

Yes

No

Not sure

If yes, what limits and why?

The proposed model 2 would make it more important for there to be a limit on the number of courses they could apply to in order to provide useful data on the number of applications to assist with planning. As we have already said though, data based on 5 choices would be meaningless for many HE providers.

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

As we have highlighted there is a tension here between what the consultation means by 'decisions' in July. If providers aren't able to process applications until July then this model is no different to the Model 1, only that it takes away perhaps the 2 weeks we would need to give applicants the opportunity to finalise their choices. It would still take HEIs 6 weeks to equally consider all applicants, which leaves the applicant 4 weeks to make their final decision and move house which in our opinion does not provide sufficient time.

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

If we were able to 'unlock' applicants where we needed to interview/audition/test etc during the Jan-July window then we don't see any substantial problems with this model for those reasons. However we would be concerned with what courses would be considered worthy of being 'allowed' to interview outside of PSRB requirements. As highlighted GuildHE members interview applicants to ensure that the applicant has the potential to succeed, they get to know the staff and campus as it is a small community, and their career aspirations align with the skills acquired on the course. We would not wish to see a rigid set of courses designated by the regulator to be allowed to undertake this early admission process which stops our members from offering the best and most personalised experience to our applicants.

21. Under Model 2, offers would be made to applicants after results day, outside of term time. Please provide your views on the support students will need to make their applications to Higher Education under this model, and do you have views on when and how this could be offered?

This model essentially means that instead of a firm, an insurance choice and the opportunity to start again through clearing, applicants will have to make a final decision based on up to 5 offers or to apply again. They will have the opportunity to discuss their preferences with teachers before results and to create their own list of first, second choice etc. For this reason we do not see there would be much change for most applicants in the support required from schools post results day. This model is far better than Model 1 in giving applicants the space to work with their teachers and parents to continue to shortlist applications between Jan-July. However, this does disadvantage HEIs, who would be wastefully processing applications for students who had already discounted the choice they made in January. It would also not give those who get 5 rejections time to start the process again.

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

We have significant concerns that both the PQ models proposed enable gamification and unwanted marketing and recruitment practices to continue to grow and go unchecked. Whilst the proposals take away the opportunity to give out unconditional offers, it instead opens the door to providers making unofficial offers outside of UCAS, and other unscrupulous practices which would not be officially noted on the applicant record. For example:

Because there is such pressure on finding accommodation, we think some HEIs will still ask applicants to book their accommodation place before they have received an offer. Instinctively such wording as “book your accommodation now - we're confident you can” will become a mainstream part of the application process, but would not be able to be monitored by anyone in an official capacity.

In terms of academic preparation, institutions may wish to send applicant's letters outside of UCAS around summer schools/projects/log-ins which language suggesting that they only do this is if they are going to make someone an offer.

Likewise, engagement schemes could be used (ie. Join our XYZ scheme for Year 13s and you get a campus visit, goody bag etc. and we'll lower your offer/take you for sure when it comes to you getting your grades).

As we have previously highlighted, if there are concessions made for providers that interview etc. we could see a mass expansion of additional testing of applicants by some universities just to get access to their applicant data earlier.

Finally members are concerned that because these two admissions models create such uncertainty for student numbers and the financial health of HEIs, this creates an environment in which marketisation and unscrupulous admissions practices will continue to flourish. We are also concerned that these models would mean that selecting institutions introduce waiting lists to ensure they don't over-recruit which would have a substantial impact on recruiting institutions and how they can operate in the admissions system.

Further Questions

23. 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.

Changing to a PQ system would be incredibly expensive for government, applicants and HE providers in a number of ways and as such we do not think the benefits outweigh the costs and burden on the sector,

especially at a time where there are other significant pressures placed upon us. For example lost learning as a result of the pandemic will be an issue young people and universities will be grappling with for some time, and we must ensure that we have an admissions system that provides the time to make contextual offers, and importantly, enables pre-sessional and bridging to take place to ensure that all students are able to succeed on their course. The mental health needs of young people is also a growing concern, and we do not believe that shifting the certainty of their future to a few short weeks before the start of term will do anything but negatively affect their mental health.

There are so many fundamental processes that would need to change in the HE, FE and schools sector and the one which we feel needs most attention but is hardly mentioned in this consultation is the additional funding and infrastructure required for both better quality IAG for young people and the overhaul of the student loan system to incorporate very late decision making. It is not simply the case of having more teachers and university staff around during the summer to make a PQ system work, to do better in our equality measures we need to take careers advice and guidance more seriously from a much earlier age, and offer a better experience for our young people.

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

Yes

No

Not sure

Please provide a reason for your answer.

We can see why for some students, and for some university courses the personal statement does not add any value to the applicant. They cause immense stress on applicants, especially for those from disadvantaged backgrounds and some universities don't even look at them. However that is not always the case - and for some HEI they are pivotal in their decision making.

Statements are not only useful to understand student motivations, but can also detail contextual circumstances that the standard UCAS application form does not. Some will declare mental health needs here, issues with their personal life, or other attributes and characteristics which we use to better understand the grade profile of the applicant that their prior attainment. We can then make that applicant a contextual offer.

What we don't find useful is how applicants state extracurricular activities without articulating the skills and experiences they acquired by doing them. Applicants from more affluent backgrounds are much more advantaged in the construction of their personal statement, both in terms of the opportunities for extracurricular activities, and the ability to better articulate how these experiences make them a better candidate. However for some courses, knowing a student applying to a veterinary course has extensive voluntary experience with animals, or a drama student is a member of the National Youth Theatre Programme for example is very useful, which is why we don't think they should be eradicated altogether.

Issues with personal statements also goes back to the IAG issue we highlighted earlier. If schools and teachers had better support to provide high quality careers advice in all schools, then the quality of the personal statements in our opinion would be better. Those career sessions could act as a framework for

the long term production of a personal statement/introductory CV that young people build over time with the skills and knowledge they develop both at school and outside.

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

We don't think it is feasible to suggest that in either of these PQ models predicted grades would become redundant. Teachers, advisers, parents and applicants need to have an idea of the tariff of the provider to apply to and whether they are likely to receive a certain number of tariff points. The HE sector is built on the prestige of tariff, and is a fundamental part of the HE market. We recognise the issue with predicted grades not being very accurate, and there are a variety of reasons for this. Some relates to 'gaming' the system because school performance is measured on Russell Group destinations of their pupils. Other issues relate to the removal of routine testing and AS levels. Fundamentally though we believe that it equally as worrying that OFQUAL cannot guarantee that the actual awarded grade is a true reflection of student performance, and we can see that there are structural barriers for disadvantaged students in achieving high A Level results which relate to the standardisation model adopted, and the types of schools POLAR 1+2 students attend.

Our members tell us that they use a variety of measures to weigh up whether an applicant would be successful. This includes GCSE results, portfolios of work, and previous experience within the industry. Members also recognise that examinations are in itself a particular skill that is not always required to be successful at a HE level. That is why interviews are an important part of our admissions process, in order to understand the applicants understanding of the subject and/or their professional experience and their passion for a specific career.

26. 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?

The experience of international students must be taken into account in the scheme of the admission system because the way international students are recruited affects the number of places available for domestic students, and the international market is a fundamental part of the reputation of UK education.

Notwithstanding the issues of visa checks, moving the start of term to October will put our term times out of sync with much of the rest of the world and inhibit student mobility and credit transfer significantly. We therefore think it is important to understand how changing the timetable will affect our international student recruitment.

27. 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.

We represent some HEIs that do not currently use UCAS for their admissions and these reforms may encourage more providers to go alone. We always need to have the ability to admit students outside of UCAS, even if UCAS is the main process the provider uses. Mature learners, international students, those we are recruiting with non-traditional qualifications or prior technical experience may not be best served by UCAS. Some students also do not want to pay to use the service when they only want to apply to one course at one specific provider.

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

GuildHE wishes to highlight that we believe there are a number of reforms that are required to future-proof the admissions process and make it more fair for applicants, especially those from disadvantaged backgrounds. We fundamentally agree that incentivised offer making (such as conditional unconditionals) should be banned, and providers need to do more to show how their admissions processes are fair and transparent, and for those decisions to be more accountable to the regulator. We think marketisation has gone too far, and without the Supporting Professional Admissions sector group which was defunded by UCAS in 2017 there is no overall sector leadership for this agenda. At GuildHE we work collaboratively with members to share practice and experience between the admissions, marketing, recruitment and WP leads and instil the importance of integrity in their approach to admissions. However, through these conversations we have learned that many large HEIs behaviours skew the behaviours of others. Whatever reforms take place as a result of this conversation needs to be better able to regulate against providers who use unscrupulous tactics to secure student numbers. One of the biggest risks to this is the issue of accommodation which we have highlighted in this consultation, and we cannot underestimate the importance of applicants knowing in good time where they will be studying in order to make such basic living arrangements.

Instead of changing the timetable to a PQ model we think there are a number of interventions that the Government and OfS could undertake that would better meet the policy aims of these proposals.

Firstly more investment is needed in IAG for both Post-18 study choices and future careers. It needs to be better funded, better resourced, with more diverse voices engaged in the delivery of IAG and started much earlier in schools. Universities through their outreach activity can do some work to contribute to this, especially capturing disadvantaged students, but again most of the funding and regulatory leavers relate to engaging older students, not where the effect is best felt (from the age of 7+).

Secondly, through TASO, third sector agencies, schools and HEI WP units we need more data on how we close the attainment and aspiration gap of disadvantaged young people. There is still a significant disconnect between the academic research we have on the cultural and social normative behaviours

which impact self censorship and aspiration raising, and also the unequal support for disadvantaged students in parts of the school system.

Thirdly we need to be cognisant of how regulation affects our WP aspirations, not only in the HE sector but schools too. Having measures related to pupils accessing elite institutions, and the overhaul of the qualification and assessment system in schools is having a negative effect on the ability for teachers to make realistic predictions of final attainment. Whilst the vast majority of teachers are wanting to give their pupils the best chance of success in their pupils university admissions, this can also skew predictions to be too generous for some pupils and not others. To remedy this there needs to be more support and data available for teachers to make more accurate predictions. As we have highlighted in this response, this issue will not vanish simply by moving the admissions timetable around. Universities are also placed under different pressures when they are processing admissions. Whilst many are making progress in contextualising their offers to reflect the unequal distribution of educational opportunity, not all do. Some are also mindful that WP students do less well in the graduate employment market and HEIs are regulated against this outcome, therefore some may be less likely to recruit students from disadvantaged backgrounds. Moving the regulatory pressure on HEIs to student achievement and graduate outcomes and away from access could continue to restrict the number of WP students elite providers accept, and this may get worse as competition from places becomes more pressing.

Finally we need to bring back an ethos in the HE sector of collaboration and cooperation. We do not believe that the push for competition and marketisation has improved quality, improved the student experience or improved the reputation of UKHE. We can clearly see that competition has had a negative impact on certain students, though not always those that are most disadvantaged. We need to remember that for the vast majority of applicants they get into their first choice, and for those that don't, they get into their insurance choice. Whilst clearing and adjustment exists they either do not work because there are no places left at elite institutions or many more students who only use clearing are less happy with the choice they made.