

UA submission to the DfE consultation on Post-Qualification Admissions Reform

About us

University Alliance (UA) is the voice of professional and technical universities. We represent 12 large to mid-sized universities working at the heart of their communities. Alliance universities partner with industry and the professions to deliver the workforce of today and tomorrow through practical, skills-based learning and applied research. Our members are:

- Anglia Ruskin University
- Birmingham City University
- University of Brighton
- Coventry University
- University of Greenwich
- University of Hertfordshire
- Kingston University
- Leeds Beckett University
- Oxford Brookes University
- University of South Wales
- Teesside University
- University of the West of England, Bristol

We welcome the opportunity to make a submission to the Department for Education's consultation on Post-Qualification Admissions Reform. We recognise that the higher education admissions system is far from perfect, and we welcome changes to make it fairer and more transparent. However, we believe the most effective way to achieve this is through **retaining and reforming the existing admissions system**.

If the Government decides to move to a post-qualification admissions system, **we strongly recommend a post-qualification offers model**, along the lines of Model 2 in the consultation document.

Our preference: reform the existing system

We believe that the higher education admissions system could be made significantly simpler, fairer, and more transparent through a series of reforms without moving to post-qualification admissions (PQA). There are some **key benefits to the existing system** that could be lost if we move to PQA, namely:

- **More time to make life changing decisions.** The current system allows applicants a prolonged period in which to engage with their preferred providers, gather information and carefully consider their choices. They have ample time to find out more about university life and what support is available – for example through taking part in taster days, visiting the campus, and meeting staff and students. This helps an aspiring student to become better informed about their options and adjust

to what lies ahead. It also provides time to sort out crucial details such as accommodation and student finance. For students with disabilities or other special needs this extra time is particularly essential.

- **Less reliance on exams.** Universities currently use a range of information about an applicant to reach an admissions decision. Predicted and final grades are important, but not the only factor. Personal statements, interviews, portfolios, and auditions can all help to give universities more information about an applicant's suitability for a particular course. In addition, contextual admissions practices are increasingly being used to address inequalities in access and participation. The current system allows time for institutions to develop a holistic view of an applicant before making their decision.
- **Our competitive advantage as a study destination for international students.** The existing admissions system is very attractive to international students because it is viewed as more efficient and predictable than systems operating in competitor countries. International students know they will receive a decision in a timely manner, and how likely it is that they will receive an offer. It is vital that any changes to the admissions system do not put this advantage at risk.

Although there are many benefits to the current system for applicants, we agree that it could be improved. A fair criticism of the system is that it is complex and lacks transparency. Students are reportedly unhappy with the system of predicted grades, with only 16% receiving accurate predictions. The Government has expressed concerns about undesirable offer making processes in the higher education sector. We believe that all these issues could be directly addressed through a series of reforms, including:

- **Enhance information, advice, and guidance (IAG) about post-18 education and training in schools and colleges.** Recent [research](#) found that two in five university students say they would have made better choices had they had better access to higher quality information and advice in school. The increasing complexity in the post-16 landscape, with the introduction of T-levels and increase in apprenticeships and higher technical qualifications means that more and better IAG will be crucial and should start earlier – ideally Key Stage 2 of primary school. The earlier students start thinking about their choices, the better informed these will be.
- **Make admissions processes more transparent, flexible, streamlined and student focused.** Institutions should publish clear information about how they make admissions decisions, including contextualised admissions. Historic, actual entry grades (including Clearing entries) should be made available alongside advertised entry requirements. UCAS should ensure its systems and processes are fit for purpose for multiple entry points and part-time, flexible, and mature learners. It should remove Adjustment, simplify UCAS Extra and look at ways to improve Clearing.

- **Overhaul the predicted grades process.** The DfE should explore fairer and more robust alternatives to predicted grades, drawing on lessons learned from teacher assessments during the pandemic.
- **Permanently ban conditional unconditional offers.** The DfE and OfS should consult with the sector on making the temporary Z3 condition permanent. This would prohibit conditional unconditional offers and restrict the use of unconditional offers to certain specified applicant circumstances.

Taken together, the above measures would significantly improve the higher education admissions system. The Government's key concerns would be addressed without a complex, costly and disruptive move to post-qualification admissions amid a global pandemic.

An acceptable alternative: Post qualification offers

We do, however, acknowledge there is broad-based support for post-qualification admissions. Although we would prefer to retain and reform the current system, we recognise that government may wish to proceed with a post-qualification admissions system. If it does so, **we would like to make the case for a post qualification offers (PQO) model akin to Model 2 in the DfE consultation, with a few important modifications**, which we outline below.

We cannot support Model 1, which only permits a six-week window for the whole higher education admissions process to take place. In our view, a compressed period in which to make life-changing decisions risks exacerbating, not tackling, disadvantage. [Recent UCAS research](#) has shown that students who apply late in the cycle, and therefore have a shorter relationship with their chosen university, are up to three times more likely to drop out by their second year than those who apply by January.

The reduced timeframe also allows less time for contextualised admissions, and for providers to take a holistic view of applicants, reducing the decision making to being purely about grades. This places undue emphasis on exam results, making the system less resilient to large and small-scale shocks that can affect exam performance, from pandemics to individual crises. Students' mental health and wellbeing is likely to be impacted as they will have less certainty about their future in this process.

In contrast, Model 2 provides more time for the admissions process, and incentivises students to start thinking about their options earlier on. However, the timescales are still compressed compared to the current system, and careful consideration needs to be given to ensure that this change would be in the best interests of all students. It is essential, for example, that timescales for A-levels and vocational qualifications are harmonised. Although students would require significantly less support over the summer with their applications than under Model 1, they would still need more support than they are provided now to help them decide which offer to accept. **Our support for Model 2 is therefore contingent upon guaranteed access to in-person advice and guidance for all applicants during August.**

It is also dependent upon applications being shared with providers at the time they are made to ensure full consideration can be given – and for providers to be able to reject applicants who clearly do not meet the course criteria. This early notice is particularly crucial to the effective management of placement-based courses such as medicine, nursing, allied health, and teaching. We also believe that consideration should be given as to whether providers should be able to accept applicants who are already qualified (e.g., those who have already obtained their Level 3 qualifications). Providers should be permitted to engage with applicants during the application phase to provide as much information, advice and support needed. However, the system needs careful policing to ensure that informal offers are not made (e.g., at interview or in private correspondence).

We share [UCAS's concerns](#) over the critical challenges that remain with any move to a post-qualification system, for example pertaining to international students and the devolved administrations, as well as those we have identified above concerning support for students in August and the overall policing of the system. It is essential that these issues are satisfactorily resolved before proceeding with a post-qualification system.