Post-Qualification Admissions Reform

Consultation response (May 2021)

About EDSK

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Our mission is to design new and better ways of helping learners of all ages succeed, particularly those from disadvantaged backgrounds.

We aim to achieve this by conducting research on topics across the education and skills landscape and then producing evidence-based recommendations for how the system needs to change, both now and in the future.

Our research covers primary schools, secondary schools, colleges, apprenticeships and universities. Whichever topic or policy area we are investigating, our priority is always to produce better outcomes for learners while also ensuring that the greatest support is given to the most disadvantaged members of society.

We work closely with a range of individuals and organisations to ensure that our research reflects a wide range of evidence on any given issue. EDSK retains copyright and full editorial control over our research, irrespective of how it is funded.

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Introduction

After many years of debate and discussion, it is encouraging to see the Department for Education (DfE) openly engage with potential reforms to the university admissions system in England. The ultimate test of any reforms will be whether they put in place an admissions system based on **students choosing universities, not universities choosing students**.

In June 2020, the EDSK think tank published a major report called 'Admitting mistakes', which explored the current university admissions system and concluded that fundamental changes are needed. The report started from the widely accepted premise that HE admissions must be:

- **Fair** – every student, irrespective of their income or wealth, should have access to the same universities and degree courses;
- **Transparent** – every student should have access to the information that they need to make informed choices about the different options available to them; and
- **Equitable** – every student, regardless of background, should be able to compete for a place at a university on a 'level playing field' with other students.

Our response to the DfE's consultation regarding post-qualification admissions reform (launched in January 2021) supports the DfE's decision to reform the current system. In line with our report last year, we believe the goal should be to create an admissions system that delivers all three principles listed above. This summary of our consultation response explains how the DfE can design an admissions system that achieves these principles with the least possible disruption.

The Government's case for change

In the DfE's consultation, three issues with the current system are named as justifications for reforming university admissions:

1. The inaccuracy of predicted grades

Predicted grades have often been found to be inaccurate, and they have become increasingly less accurate over time. UCAS found that in 2019, 79 percent of 18-year-olds who were accepted at university had predicted grades that were overpredicted, and 8 per cent were underpredicted.[1]

Other issues cited by the consultation in relation to the inaccuracy of predicted grades include:

- **Adverse impact on high-achieving disadvantaged students**. High-achieving disadvantaged students are more likely to be underpredicted than high-achieving advantaged students.

- **Undermatching**. Applicants accepting a place on a course that requires lower grades than those they achieved.

2. Simplicity and transparency

Given how complex the current admissions system is, it can be poorly understood by those with unequal access to information, advice and guidance. It is often the most disadvantaged, and those who are the first in their family to go to university, who are the most impacted by this. The consultation stated that the following problems need to be addressed:

- **The mismatch between course grades advertised and the grades accepted**. This issue of transparency is problematic for all, but especially for disadvantaged students who are more likely to apply for courses they believe they will likely meet the grades for.

- **Complex additional admissions processes**. 'Clearing' (where applicants are matched to university places that are yet to be filled) adds further complexity to the system, and 'adjustment' (where students who exceed the conditions of their 'firm' choice can find an alternative place) is underused and more likely to benefit advantaged students.

3. Unconditional offers

Unconditional offers were once uncommon, offered only to those who had already achieved the necessary entry requirements, or proved their ability in an audition/portfolio. In 2013 only 1.1 per cent of applicants had an offer with an unconditional component, but by 2019 this had increased to 37.7 per cent,[2] indicating unconditional offers are increasingly being used as a recruitment strategy. This contributes to a range of issues:

- **The risk of reduced attainment and university continuation rates**. In 2019 UCAS found that unconditional offers had a negative impact on the A-level outcomes of students, with 18-year-olds who accepted one being 11.5 per cent more likely to miss their predicted A-level results by three or more grades[3]. In addition, the Office for Students (OfS) found that students who accepted an unconditional offer are more likely to drop out after their first year of university.[4]
- **The impact on disadvantaged students**. Offers with an unconditional component are most likely to be offered to the most disadvantaged students. Students who are the first in their family to go to university may be more likely to accept such an offer, with limited information about the potential disadvantages.
- **Constraining choice**. Students who accept unconditional offers entirely on the basis that they are unconditional potentially limit themselves in their consideration of other universities, leading some to make sub-optimal choices.

To resolve the three issues listed above, the DfE's consultation proposed two alternative models to the current admissions system:

Model 1: Post-qualification applications and offers
Under this model, applicants would only apply to HE after sitting their exams and receiving their results. Results day would be moved forward from August to the end of July, and HE term dates would be pushed back to the first week of October. This would allow at least six weeks for the processing of applicants and making of offers by HE providers.

Model 2: Pre-qualification applications with post-qualification offers and decisions
In this model, students would apply in the normal way around the same time they currently do, prior to the examination period beginning. However, applications would be held in the system until results day, and offers would only be made once results are known.

Why Post Qualification Applications (PQA) is the wrong choice

Based on EDSK's research last year, we do not believe that a PQA model would offer a significant improvement on the current system. The DfE's consultation correctly notes that predicted grades are inaccurate in the vast majority of cases, and it tends to be high-achieving students from disadvantaged backgrounds who are the most likely to be underpredicted. A PQA system no longer requiring the use of predicted grades would therefore be, at least in principle, an improvement in terms of the fairness and equity of the admissions system. However, as will be described in this section, there are numerous flaws with a PQA model that would make it undesirable and potentially unfeasible in the context of reforming the admissions system in England.

Simplicity and transparency

The 'mismatch' between course grades advertised and the grades accepted is a significant issue in the current system due to a lack of transparency, yet there is no reason to believe that transparency in terms of entry requirements would improve in a PQA model. Despite entry requirements being published well in advance of the start of each academic year, universities can ignore their own requirements. This undermines any attempt to create a transparent application system, because students have no clear indicator of exactly what grades will be required from them on results day to be accepted onto a course. **This mismatch between advertised grades and accepted grades is unfair on students, parents and teachers and it is likely to persist under a PQA model**.

Furthermore, simplicity has been identified by the DfE's consultation as another problem with the admissions system, yet a PQA model could make things even more complicated. **By moving the entire application and offer system until after results day, the complexity of the system could increase dramatically** as PQA would essentially create a 'free for all' across tens of thousands of applicants and hundreds of institutions. Under a PQA system, the ongoing competition between universities to secure enough students to remain financially viable would be condensed into a few weeks. This would put enormous pressure on students to make important decisions about their future in a very short time frame. This raises concerns around a lack of equity and transparency while doing nothing to improve the simplicity of the system.

Unconditional offers

Although the evidence suggests the DfE is right to identify unconditional offers as an issue, such offers are ultimately a symptom of a serious underlying problem in the current system. Universities vigorously compete with one another to secure enough students each year. As a result, they appear to be increasingly using unconditional offers to 'incentivise' (bribe) students to attend their institutions.

While it is true that unconditional offers will no longer exist in their current form under a PQA system, the whole application system would instead be converted to 'direct unconditional offers'. These offers, which are already given to about 12 per cent of applicants each year,[5] are unconditional at the point when the original offer is made to an applicant irrespective of whether the applicant subsequently selects the HE institution as their first ('firm') or second ('insurance') choice.

Given the short time frame created by a PQA model for students to choose a course and for universities to secure enough students, universities may simply switch to using other potentially more damaging incentives to recruit students in the absence of 'unconditional offers' in their current guise. This will become even more apparent if some institutions are at risk of financial failure should they be unsuccessful in attracting enough students. **An explosion in 'direct unconditional offers' within a condensed timeframe under a PQA system will put even more pressure on students to make a <u>quick</u> decision rather than the <u>right</u> decision,** which would mean that 'mismatching' is likely to continue and could get even worse as some universities become increasingly desperate to recruit a sufficient number of students in the period after results day.

Disadvantaged students

If both applications and offers occur after results day, it could lead to significant inequalities between students. **Students who attend the schools / colleges with access to the best resources and careers support as well as students with the most well-informed family networks will benefit the most from a PQA model**. Disadvantaged students at state schools would be disproportionately affected as such schools have less time, resources and expertise available under the current admissions system, let alone during the summer holidays where the majority of staff are unavailable. This is likely to result in the most disadvantaged students being forced to navigate the admissions process and make future-defining decisions with limited support and guidance relative to the most advantaged students.

A further cause for concern is that **the PQA model would presumably operate on a first-come-first-served basis after results day. This would put students under pressure to make their decision quickly because if they do not take up an offer (regardless of whether it is their first choice or not) then someone else might take the available place instead**. Once again, it is disadvantaged students who would be most impacted by this, due to the limited resources their schools might have, particularly during the summer holidays. The problem of 'undermatching' could therefore worsen, as disadvantaged students from families/schools with little or no history of applying to university would find it hard to navigate a complex system when faced with such time constraints and pressure from institutions to accept a place. Consequently, a PQA model could reduce the fairness and equity of the admissions system, as students from disadvantaged backgrounds would not be on a 'level playing field' with other students. In short, if the Government is concerned about the barriers that disadvantaged groups face, a PQA system does not help resolve them.

Disruption

A significant disadvantage of a PQA model is the level of disruption it would cause during its implementation. Moving results day forward by several weeks would require a trade-off. Either there would have to be a reduction in quality assurance in the marking of exams, or Level 3 exams will need to be moved much earlier to accommodate time for marking and quality assurance. Neither of these scenarios are desirable.

Ofqual previously found that marking accuracy is already a significant problem in some subjects, with exam markers only agreeing about 50 per cent of the time for essay-based subjects – this could worsen if the timeframe for marking is condensed under a PQA model.[6] What's more, EDSK's research last year showed that the issue of moving Level 3 exams earlier was a major factor in the demise of UCAS's proposed reforms of the admissions system in 2011. In response to UCAS's consultation at the time, 75 per cent of respondents disagreed that "the resources available in schools and colleges will be sufficient to give students support to make applications and manage offers in the timescale proposed"[7] and only 26 per cent agreed that "a system of applying post-results during the summer would give universities enough time to process applications before term starts in October."[8]

Furthermore, just 29 per cent of consultation respondents agreed or strongly agreed that "bringing the A-level exam period forward by three weeks would not have an impact on results achieved."[9] UCAS reported that "there were strong indications from schools, colleges, awarding bodies, Ofqual and HEIs that the loss of three weeks' teaching time would be damaging to curriculum delivery, student achievement and standards", which "would be unfair on the majority of students who are not entering higher education." Respondents also

"made clear that a change in the timetabling of A-level teaching and examinations would have an impact on the scheduling of GCSEs which would create an even bigger burden on schools." In summary, "despite a willingness to try, it appears that the practicalities and challenges of dealing with applications in the proposed timeframe might be insurmountable."[10]

Further disruption would be caused by a PQA model when trying to accommodate all the necessary auditions, interviews and entry tests between applications and offers. With a variety of institutions requiring such additional application processes, it is unrealistic to suggest that they could all be accommodated within a few weeks over the summer holidays. Again, this would have the greatest impact on the most disadvantaged students, as they may be less able to attend auditions, interviews and entry tests across the country in the space of just a few weeks. There would also be issues relating to how universities make the decision about who to invite to the next stage of auditions, interviews and tests, which were not explored in DfE's consultation yet represent one of the greatest logistical problems facing a PQA model.

Why Post Qualification Offers (PQO) is a better option than PQA

The previous chapter highlighted several significant weaknesses in a PQA model that are sufficiently large in magnitude to rule out PQA as a sensible and viable option for reforming the admissions system. The same conclusion was reached in EDSK's report last year. That said, the removal of predicted grades within a PQA model remains one of its most appealing aspects. The DfE's consultation stated that in a PQO system students would "apply in the normal way, and at more or less the same time as they currently do",[11] suggesting that predicted grades would continue to be used within a future PQO system. Nevertheless, it is crucial that any reforms reject the use of predicted grades entirely. A PQO model that can be delivered in the absence of predicted grades will be described later in this summary of EDSK's consultation response.

If PQA is not viable, the question is therefore whether a PQO model would be better than the current application system. Leaving aside the issue of predicted grades, a PQO model would offer several benefits over a PQA model.

Simplicity and transparency

A significant advantage of PQO is that it would require fewer (if any) changes to the timetable of exams, results day and the start of the university term. In contrast to the considerable disruption that PQA would generate, the limited disruption offered by PQO would be beneficial for all concerned. As there would be little or no disturbance to the quality assurance and marking of examinations, and Level 3 exams would not need to be moved forward to accommodate the necessary processes within a PQA model, PQO would avoid significant amounts of new complexity for virtually all stakeholders.

Another advantage of PQO is that it would not require major changes to the way that the application cycle currently operates. While PQA would almost certainly result in applicants attempting to navigate applications and offers during the summer holidays with limited support, PQO would ensure students can receive the same amount of guidance as they do in the current system. Given that students would still be choosing which universities to apply to and filling out their applications during term time under a PQO model, they would continue to have access to the necessary support from careers advisors and teachers. Therefore, PQO would be better than PQA for students and staff.

Unconditional offers

As noted earlier, universities are often engaged in a fierce competition with one another to attract enough students and use these offers to 'incentivise' applicants to attend their institutions. In a PQA model, this competition would be condensed into a very short timeframe, which could make the competition even more intense than it is now. Consequently, PQO would be preferable because it would follow the same timetable that is currently in place – avoiding this condensed period of highly competitive behaviour from some universities as they seek to attract students through any possible means.

Even so, the chief executive of UCAS recently admitted that, while they predicted a fall in some types of unconditional offers following increased political scrutiny, "we will likely see universities and colleges deploy other offer-making strategies …in this competitive market."[12] Such sentiments reflect the fact that universities would remain free to use whatever 'incentives' they deem necessary to recruit enough students under a PQO model. It is entirely possible that alternative recruitment strategies and 'incentives' would persist (and potentially expand) under both the PQO and PQA models described in the DfE consultation, even though these strategies could be just as harmful to the best interests of students and contribute to ongoing problems with 'mismatching'. Ultimately, the only way to prevent unconditional offers is to stop universities from being able to lower their entry requirements as they seek to attract more students.

Disadvantaged students

Because PQO would allow the admissions process to be delivered within the existing application timeframes, disadvantaged students would still be able to benefit from support provided by careers advisors and teachers during term time while navigating the application process. In contrast, a PQA model is likely to result in disadvantaged students receiving less support than they currently have access to, which could have serious implications for social mobility.

Why the proposed PQA and PQO models would not deliver a fair, transparent and equitable system

While the PQO model described in the consultation is a better option than PQA, even PQO would not resolve several critical weaknesses in the current admissions system. Below are a range of examples of the barriers to a fair, transparent and equitable system that would remain in place irrespective of which of the proposed PQA or PQO models are implemented.

The risk of 'unofficial' predicted grades

Although EDSK strongly supports the DfE's desire to remove predicted grades from the application process, a significant risk in removing predicted grades is that it would result in universities using 'unofficial' predicted grades instead. This would be a particular problem for the DfE's proposed PQO model, but it could also apply to a PQA model too.

For example, GCSE results could be used by universities as a means of predicting what a student might achieve at A-level. However, the NFER found in 2011 there was only a 'moderate' correlation between GCSE and A-level performance (around 0.6 on a scale of 0 to 1, with 1 being a 'perfect' correlation and 0 representing no correlation at all).[13] Moreover, Ofqual found in 2017 that even when you only look at the relationship between GCSEs and A-levels in the same subject, the correlation is still no higher than 0.55-0.6.[14] To make matters worse, research by Cambridge Assessment showed that for some subjects, particularly those that are often only available at A-level, the correlations drop to even lower levels. For example, the correlation between GCSE performance and A-level Government and Politics is typically around 0.5, falling to around 0.4 for A-levels in Psychology and Economics and just 0.3 for A-levels in Law and Sociology.[15]

A similar conclusion was reached in a research paper published last year by the Centre for Education Policy and Equalising Opportunities at UCL, who illustrated the problems inherent in trying to predict future A-level performance based on prior attainment:

> "…this analysis has shown the difficulties in accurately predicting A level grades, regardless of the method used. Accuracy of predictions varies across levels of achievement, school type, and subject studied. This raises some significant questions about why such predictions play such a prominent role in the UK's education system given the amount of inaccuracy found in measuring them, and the risk to exacerbating inequalities in life chances for young people in different settings. Our results also highlight concerning

instances where pupils are "hard to predict" and go on to over-perform at A level, given their GCSE results – most notably high achieving non-selective state school pupils." [16]

Scrapping predicted grades, only to have them replaced by unofficial predictions such as applicants' GCSE results, would be very concerning. Students who perform modestly in their GCSEs but excel in their A-levels would be severely penalised by such a system, which would be unfair and inequitable.

Failing to end the mismatch between grades advertised and grades accepted

The 'mismatch' between grades advertised and grades accepted by universities is a significant problem. In 2019, UCAS found that 49 per cent of 18-year-olds who sat at least three A-levels were accepted with lower grades than those advertised, showing the extent to which advertised grade requirements do not always match the grades of students admitted[17] . The consultation states that it supports existing proposals to force universities to publish their historic entry grades in an attempt to overcome mismatching. This would represent an improvement in terms of transparency relative to the current admissions system. However, publishing historic entry grades will not tell students what grades they need to achieve in their current application cycle.

Despite the UCAS website stating universities set entry requirements "to ensure you have the right skills and knowledge to successfully complete the course",[18] universities can completely disregard their own stated requirements - making it impossible for applicants to know exactly what they need to achieve to be accepted onto any given degree. This would persist under the proposed PQA and PQO models as there would still be no accountability system in place to monitor or prevent such behaviour from universities in each application cycle.

Inconsistent and opaque use of contextual admissions

Another problem regarding transparency in the current admissions system is the lack of clarity surrounding 'contextual admissions' (where the social background or characteristics of an applicant is considered during the application process). Contextual admissions are intended to improve the prospects of disadvantaged students, but some universities do not use contextual admissions and OfS has found most of them "make no reference in their admissions information to how they use contextual data or whether they make contextual offers".[19] Not only is it unclear which institutions use contextual data and how they use it, there is variation within institutions with no requirement for universities to operate a consistent policy across their different departments. It is also often unclear what weighting is

attached to each factor or the extent of any subsequent grade reduction. The inconsistencies and lack of transparency regarding contextual admissions needs to be resolved yet introducing a PQO or a PQA model would not address this issue.

Lack of transparency about the competitiveness of courses

An important element of creating a transparent application system that is not mentioned in the consultation is the visibility over how competitive each degree course is likely to be. Currently UCAS does not share how many places are available on each course during the application process because HE institutions do not publicly provide this information. Without knowing this number, it is virtually impossible for students to gauge the likelihood of their application being successful in terms of the relative popularity of a degree. The 'student:staff' ratios that some university league tables share provide little value for individual students applying for specific courses because the ratios are retrospective and give no sense of how large or small a course will be in the next academic year. This lack of transparency reduces the fairness and equity of the admissions system because it gives an advantage to the schools and colleges with the greatest experience of applying to specific courses at specific universities, who may have acquired some information about available places through previous application cycles.

The impact of interviews and entry tests on social mobility

The use of entry tests and interviews disproportionately affects students from disadvantaged backgrounds. Under both the proposed models, applicants from the most privileged backgrounds would continue to have a significant edge during entry tests and interviews. Applicants who have access to additional forms of practice, support and tuition when preparing for entry exams – either through their school/college or paid for by their family – will almost certainly continue to use this to their advantage. This is also true for university interviews. It is important to recognise that during interviews there are no formal processes for an applicant's background to be taken into account. Research evidence has also found that tutors are susceptible to numerous biases, such as giving higher ratings to applicants with similar attitudes and demographic characteristics to them.[20] Consequently, the most disadvantaged students are not able to apply on a level playing field relative to the most privileged students when it comes to entry tests and interviews. Such admissions processes are inherently unfair and inequitable, and will continue to impact the most disadvantaged applicants under a PQA or PQO model.

The continuation of 'undermatching'

Undermatching is when an applicant accepts a place on a course requiring lower grades than they have achieved, where they could have secured a place on a more competitive course. Research has found that 15 per cent of students 'undermatch' and there is a higher likelihood of disadvantaged students being undermatched.[21] In the current system where applicants only keep hold of a 'firm' and 'insurance' offer until results day, students are encouraged to be pragmatic and cautious about their university choices to prevent ending up with no acceptances. While the consultation states that PQA would address the issue of undermatching as applicants would be applying with their achieved grades, EDSK has concluded that PQA is not a viable option for reform so an alternative solution for undermatching is required.

PQO would at least maintain the existing application timetable, thus giving students time to discuss and carefully consider their applications. Nonetheless, this would not adequately deal with the problem of undermatching because students would remain limited to a single 'firm' and 'insurance' offer. Without directly addressing the issue of undermatching in a new admissions system, high-achieving disadvantaged students are likely to continue missing out on the most popular and selective courses.

The detrimental impact of personal statements on disadvantaged students

Concerns around the use of personal statements are longstanding. The 'Schwartz Review' in 2004 highlighted the potential problems generated by using personal statements:

> *"There is wide variation in the support provided to applicants in preparing their personal statements for application forms. …Levels of understanding of what is required vary significantly among staff who advise applicants or write references. Anecdotal evidence suggests that some staff and parents advise to the extent that the personal statement cannot be seen as the applicant's own work."* [22]

This was supported by the recent work of Dr Steven Jones, who analysed over 300 personal statements submitted to Russell Group universities by applicants who had similar levels of academic achievement (BBB at A-level). The linguistic analysis of the statements uncovered clear differences between the statements of private/grammar school applicants and those from state schools:

> *"The statements of those from private/grammar schools were longer, with longer sentences and longer words, and perhaps more importantly, the statements from comprehensive*

school pupils contained more spelling errors and punctuation errors. These differences were quite significant – the chance of a personal statement received from a private school applicant being entirely free of typing/spelling errors was almost double that of one from a sixth form college applicant." [23]

Dr Jones added that private school pupils submitted statements which were "carefully crafted, written in an academically appropriate way, and filled with high status, relevant activities", which suggests they received help from the school they attended. What's more, the analysis showed that private / grammar school pupils had access to a broader and more diverse set of work experience opportunities and extracurricular activities to discuss on their personal statements. Private school pupils were also more likely to mention the name of their schools in their statements, indicating that they felt this could put them at an advantage.[24]

Numerous academics and commentators have voiced their own concerns in recent years about the fairness of using personal statements. Dr Lee Elliot Major, then CEO of the Sutton Trust, questioned the usefulness of personal statements because there's a whole industry built around them, given how much is at stake: "Private tutors and former graduates prepare and write them for these young people. You have to look at the system and ask the question: is it fair? I don't think it is." Similarly, Simon Atkinson, who interviews medicine, veterinary and dentistry students at the University of Bristol, commented that personal statements are "too unreliable, too easy to get a lot of help with writing, and too easy to write things that aren't terribly true."[25]

The evidence is clear: by allowing personal statements to remain in any future admissions system, applicants from the most privileged backgrounds will continue to have an advantage over less privileged applicants when applying to universities.

A new proposal for reforming university admissions

The DfE consultation on reforming admissions identified the following issues that a new admissions system would need to resolve:

- The inaccuracy of predicted grades
- A lack of simplicity and transparency
- The use of unconditional offers

The consultation response from EDSK has identified a further set of problems that neither of the consultation's proposed admissions models would address:

- The risk of 'unofficial' predicted grades
- Failing to end the mismatch between advertised and accepted grades
- Inconsistent and opaque use of contextual admissions
- Lack of transparency about the competitiveness of courses
- The impact of interviews and entry tests on social mobility
- The continuation of undermatching
- The detrimental impact of personal statements on disadvantaged students

The admissions model that EDSK outlined in our ['Admitting mistakes' report](#) in 2020 offers a solution to all the problems listed above. Using EDSK's proposed model, it is possible to create an HE admissions system that is fair, transparent and equitable from the start of the application cycle up to (and beyond) results day. Furthermore, **EDSK's model would ensure that we have an admissions system based on students choosing universities, not universities choosing students**.

The start of the application cycle

It is vital that any future admissions system prioritises transparency, which means that mismatching must be eradicated from the admissions system altogether. To achieve this, universities should be held to account for the entry requirements they advertise. Under our model, universities will be required to publish a 'standard qualification requirement' (SQR) for all undergraduate degrees at the beginning of every application cycle, which will ensure applicants know exactly what is expected of them to be accepted onto a course. Once published, the SQR cannot be altered by universities at any point, and no student can be accepted onto a degree if they fail to meet the SQR.

To be effective, this approach would require introducing some form of sanctions for universities if they do not follow the rules - potentially in the form of refusing to provide student loan funding for any student who does not meet the advertised entry requirement for a course. **By holding universities to account for the entry requirements that they publish, it would eradicate the mismatch between grades advertised and grades accepted** as every student accepted onto a course must have achieved the SQR.

Making universities stick to their published entry requirements will also bring an end to unconditional offers. These offers are caused by the hyper-competitive behaviour of some universities to attract students. By banning providers from dropping their entry grades to entice students, unconditional offers will no longer be available as means to encourage applicants to attend any given institution. EDSK's report last year outlined a limited number of subjects where these offers may still be allowed (e.g. art courses that rely more on portfolios of an applicant's work) but these would be tightly restricted to prevent the re-emergence of unconditional offers in future.

Another transparency issue is the lack of information about the competitiveness of each degree course. To resolve this, alongside publishing the SQR for each course universities should also be required to state the maximum number of students they can accept onto each degree course without compromising the quality of education they provide. Information about course sizes would therefore be available to students throughout the entire application cycle so that there is genuine transparency over how many places are available on any given degree. **Publishing information about the number of spaces available on every degree will put an end to the lack of transparency about the competitiveness of degree courses** and enable students to gauge the likelihood of their application being successful in terms of the relative popularity of a course. It will also force universities to be honest with applicants about how large their course will be, which could encourage applicants to look elsewhere if they feel that they would receive a better experience at a different institution.

During the application cycle

The inconsistent and opaque use of contextual admissions in the current system leads to unnecessary complexity, as well as reducing the fairness, transparency and equity of the overall system. Following the publication of the SQR for every degree under our model, a new national contextual offer (NCO) should be introduced and applied to the SQRs at all universities. The NCO would automatically reduce the grades required by applicants facing the greatest level of disadvantage, including care leaders, those living in deprived areas and students who attend a low-performing secondary school or college. The NCO will therefore create an 'adjusted qualification requirement' (AQR) for applicants who are deemed to be

disadvantaged in some way. **A standardised approach to contextual admissions will represent a significant improvement in terms of simplicity, transparency, fairness and equity**, which would be enormously beneficial for applicants from the most disadvantaged backgrounds.

Another significant problem within the current application cycle is the use of interviews and entrance tests because they unfairly hinder those from the least privileged backgrounds. As a result, EDSK proposes removing interviews and entrance tests from the application process. However, we recognise that specific courses may require some form of interview or entry test such as Medicine, Dentistry and Veterinary Science. For these degrees, it might be worth considering various compromises that could promote fairer access to students from disadvantaged backgrounds without undermining the need to identify appropriate candidates. Nonetheless, **by scrapping unnecessary tests and interviews where possible, the detrimental impact of interviews and entrance exams on social mobility will be significantly reduced**.

An additional barrier to a fair and equitable system is the use of personal statements and academic references. Given that they bias the whole admissions system against the most disadvantaged applicants, EDSK proposes that they are scrapped altogether. By removing personal statements and academic references, the application process will no longer be systematically biased against those who have faced the greatest obstacles in their educational journey. This would be a **significant step towards a fairer and more equitable admissions system**.

Allocating places to students

The risk of 'unofficial' predicted grades appearing in future must be dealt with directly. If the DfE allows predicted grades to simply be replaced by unofficial predictions (e.g. GCSE scores) in a new admissions system, it would effectively replace one unreliable and inaccurate system with another unreliable and inaccurate system. It is therefore essential that the DfE designs a new admissions model that explicitly prevents the emergence and subsequent use of unofficial predicted grades – which is precisely what EDSK's proposed admissions model would deliver.

In future, applicants should be free to select any 10 university degrees and then rank them in order of preference. EDSK proposes that applicants would select 10 courses from any university and enter them into their online application form managed by UCAS (to be submitted in January of each application cycle, as under the current system). Although applicants can choose any degree courses they wish, they will be instructed (by the UCAS

online portal and their teachers) that their 10 choices should include a mixture of degree courses that:

- <u>Are above</u> their current level of performance;
- <u>Match</u> their current level of performance; and
- <u>Are below</u> their current level of performance.

Ultimately it will be up to the individual applicant to select the degree courses and universities that they believe are most suitable for them. This proposal shares some similarities with the admissions system used in Ireland, where applicants can select up to 10 Bachelor's (Honours) Degrees and are instructed to list the courses "based on your genuine order of preference".[26]

One of the most significant problems identified in the DfE consultation is 'undermatching'. EDSK's proposed approach of ranking 10 courses in order of preference would encourage applicants to use their top two or three preferences to make a deliberately optimistic choice about the courses and institutions they would like to attend. This would mean that any student who outperforms their expectations (or their teacher's expectations) is likely to be rewarded with a much better match of their exam results to their degree course. To summarise, **not only does this approach eliminate the need for predicted grades, it would also reduce, if not eliminate, the problem of 'undermatching'** because applicants would become more ambitious with their choices than allowed by the current system of a single 'firm' and 'insurance' offer.

The possible emergence of 'unofficial' predicted grades would be driven by the fact that under the current system universities can reject students based on their predicted grades from teachers. In contrast, EDSK's model is designed to create an admissions system that has students choosing universities, not universities choosing students. As a result, the preference-based model outlined above means that in advance of results day universities will not require any information about applicants nor will universities make any offers to students. Instead, as described in the next section below, places will be allocated to students based on their preferences and examination results on results day rather than universities determining whether a student is of a suitable standard prior to even sitting their exams.

Results day

EDSK proposes that on results day, university places will be automatically allocated based on students' lists of preferred courses. The model would operate in the following way:

- Starting with the most oversubscribed course, all applicants who listed the course as their first preference and have reached or surpassed the entry requirements will be

entered into a lottery. This lottery will allocate places to applicants purely by chance, up to the maximum number of places available for that degree course. All the successful applicants will be offered a place on that course starting in October that year.

- Having started with the most oversubscribed course, the admissions system would then move onto the next most oversubscribed course and eventually work down the whole list of oversubscribed courses. On each occasion, places would be allocated using lotteries that include any applicant who has chosen a course as their first preference and has reached or surpassed the entry requirements. Should an applicant not be offered a place for their first preference, they will automatically be entered into the lottery for their next highest preference if they have reached or surpassed the entry requirements.

- This process will continue based on the order of each applicant's 10 preferences until they receive an offer of a place. For example, any applicant who missed out on their second preference course in a previous lottery will subsequently be entered for the lottery to attend their third preference course and institution if they have reached the entry requirements.

- For any course that is undersubscribed relative to the total number of available places, any applicant who reaches or surpasses the entry requirements and has listed the course as their highest remaining preference will be offered a place on the course by default. This will continue until all applicants have either been offered a place on one of their 10 preferred courses or their list of preferences has been exhausted.

Any applicant who was not awarded a place from their list of 10 preferred courses, or who rejected an offer that they received, will be able to choose another course during 'clearing'. As happens now, HE institutions will be able to use this process to fill any remaining places they have on their courses after the initial allocation of places.

Following the completion of the automatic allocation of places by lottery for oversubscribed courses, UCAS will immediately be able to identify those courses that still have places available as universities will already have informed UCAS of the maximum number of students they can accept. As happens now, students will be allowed to apply to any HE institution that has vacancies on a particular course. However, under this new admissions model, the SQR is a formal requirement for all applicants. This means that an HE institution will be banned from accepting any student who has not met their entry requirements for a specific degree - even through the clearing process. The logic remains the same as before: if an applicant has not met a university's minimum requirements for demonstrating their potential to succeed on a course, there are no grounds for them to be admitted either before or during the clearing process.

A second approach would be to broadly follow the admissions system used in Ireland. Offers are given out in September based on exam results using a rounds-based system, with three rounds in total. Students are given a week to either accept or reject the offer that they receive in each round based on their order of preferences, with the next round generally opening up a few days later. All of this is done online. The admissions computer system is programmed to offer places to applicants according to the entry requirements for a specific college as well as the specific entry requirement for the course in question. As a result, the system ensures that "at the offer stage, you will receive an offer of the course highest up on your course choices list(s) that you are deemed eligible for"[27].

The benefits of EDSK's preference-based model would be considerable. Firstly, as noted above **'undermatching' would be resolved as students would have aimed high in their application process** and therefore would potentially be able to secure a place on a course that closely matches their results if they exceed their own expectations. This represents a significant improvement on the current system that does not systematically reward aspiration or overachievement. Another benefit would be the simplicity and transparency of this whole process because **students of all abilities would be treated the same way based on their list of preferences**. Simplicity and transparency would be further enhanced by the fact that the whole system would operate with very little (if any) need for students to be advised by teachers during the summer holidays about which offers to accept because their list of preferences formed part of their original application.

In addition to the above benefits, **EDSK's model is designed to level the playing field between the most and least advantaged applicants**. This preference-based system will be much fairer and more equitable than the current system that – through personal statements, interviews, entrance tests and academic references – is clearly tilted in favour of the most privileged applicants. By removing the aspects of the admissions system that are most biased against disadvantaged applicants while also creating a simple and transparent system for allocating places, EDSK's proposals would lead to a fair, transparent and equitable admissions system.

Conclusion

This summary of EDSK's consultation response on reforming university admissions has shown why the sense of dismay and injustice that is generated by our current admissions system is entirely warranted. Allowing wealth and privilege to unduly influence who gets accepted onto university degree courses, particularly at the most prestigious institutions, inevitably results in an overwhelming sense of unfairness as well as risking a catastrophic loss of trust - not just in the admissions process, but in the education system as a whole. **Maintaining the status quo - or even close variants of the status quo - is not an option**.

The landmark 'Robbins Report' in 1963 asserted that "it is essential that the arrangements for the selection of students should not only be fair, but also that they should be seen to be fair."[28] Similarly, the Schwartz Review in 2004 said "it is vital that all stakeholders in the admissions process …believe the system is fair".[29] More recently, the 2019 Conservative Party election manifesto set the goal of having an admissions system that is "underpinned by a commitment to fairness …and access",[30] while the OfS has stated its desire to see a system that is "fair, transparent and inclusive". [31] As this consultation response from EDSK has repeatedly demonstrated, the existing admissions system cannot plausibly claim to be fair or transparent, especially for those applicants who face the greatest barriers to accessing HE.

The overriding goal must be to build an admissions system based on students choosing universities, not universities choosing students. This change in approach should not be taken lightly, especially as so many aspects of the admissions system such as predicted grades have been in place for many years. Nevertheless, the evidence presented in this consultation response and in EDSK's major report last year leave little doubt that major changes are needed to ensure every university and every degree is within reach of every student, regardless of their background or circumstances. If the necessary changes are now put in place to create a robust and effective PQO admissions model based on EDSK's proposals, we may finally be able to state with confidence that this country has a university admissions system built on fairness, transparency and equity.

References

[1] Department for Education, *Post-Qualification Admissions Reform: Government Consultation* (London: DfE, 2021), 8.

[2] Ibid., 10.

[3] Ibid., 11.

[4] Ibid., 10.

[5] Tom Richmond and Andrew Bailey, *Admitting Mistakes: Creating a New Model for University Admissions* (London: EDSK, 2020), 20.

[6] Ofqual, '11 Things We Know about Marking and 2 Things We Don't …yet', Webpage, 2019.

[7] Universities and Colleges Admissions Service, *Admissions Process Review Findings and Recommendations* (Cheltenham: UCAS, 2012), 49.

[8] Ibid., 56.

[9] Ibid., 55.

[10] Ibid.

[11] Department for Education, *Post-Qualification Admissions Reform: Government Consultation*, 24.

[12] Nicola Woolcock, 'Universities Lock in Students with Guaranteed Places', *The Times*, 30 January 2020.

[13] Tom Benton and Yin Lin, *Investigating the Relationship between A Level Results and Prior Attainment at GCSE* (Slough: National Foundation for Educational Research, 2011), 9.

[14] Ofqual, *Progression from GCSE to A Level: Comparative Progression Analysis as a New Approach to Investigating Inter-Subject Comparability* (Coventry: Ofqual, 2017), 11.

[15] Tom Sutch, *Progression from GCSE to AS and A Level, 2010: Statistics Report Series No. 69* (Cambridge: Cambridge Assessment, 2013), 20–22.

[16] Jake Anders et al., *Grade Expectations: How Well Can We Predict Future Grades Based on Past Performance? (Working Paper No. 20-14)* (London: Centre for Education Policy and Equalising Opportunities, 2020), 16.

[17] Department for Education, *Post-Qualification Admissions Reform: Government Consultation*, 11.

[18] Universities and Colleges Admissions Service, 'UCAS Undergraduate Entry Requirements', Webpage, 2019.

[19] Office for Students, *Insight 3 - Contextual Admissions: Promoting Fairness and Rethinking Merit* (Bristol: OfS, 2019), 4.

[20] Anna Zimdars, 'Fairness and Undergraduate Admission: A Qualitative Exploration of Admissions Choices at the University of Oxford', *Oxford Review of Education* 36, no. 3 (2010): 307–23.

[21] Department for Education, *Post-Qualification Admissions Reform: Government Consultation*, 8.

[22] Steven Schwartz, *Fair Admissions to Higher Education: Recommendations for Good Practice* (Nottingham: Department for Education and Skills, 2004), 26.

[23] Gill Wyness, *Rules of the Game: Disadvantaged Students and the University Admissions Process* (London: Sutton Trust, 2017), 24.

[24] Ibid.

[25] Tess Reidy, 'Do Universities Still Bother Reading Personal Statements?', *The Guardian*, 11 January 2018.

[26] Central Applications Office, *Handbook 2020* (Galway: CAO, 2019), 12.

[27] University College Dublin, 'CAO Applications', 2021.

[28] Professor Lord Robbins, *The Report Of The Committee On Higher Education* (London: Her Majesty's Stationery Office, 1963), 231.

[29] Steven Schwartz, *Fair Admissions to Higher Education: Recommendations for Good Practice*, 4.

[30] The Conservative and Unionist Party, *Get Brexit Done: Unleash Britain's Potential* (London: The Conservative and Unionist Party, 2019), 37.

[31] Office for Students, *English Higher Education 2019: The Office for Students Annual Review* (Bristol: OfS, 2019), 11.