UCAS REIMAGINING UK ADMISSIONS

April 2021



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SECTION ONE: INTRODUCTION CLARE MARCHANT, UCAS CHIEF EXECUTIVE

UCAS operates across the UK and internationally to provide information, advice, and admissions services to help both young and adult students to progress to the next stage of education and learning. This service spans undergraduate, postgraduate, higher technical, and apprenticeship pathways, with the undergraduate service alone supporting 700,000 applicants a year from over 200 countries and territories, with more than 400 different verified qualifications, to access UK higher education. This service is underpinned by UCAS' charitable objectives of fair admissions, transparency, and putting applicants' best interests at the heart of the system, particularly for those from a disadvantaged or difficult background.

Reform and constant improvement are in UCAS' DNA. Over the years, UCAS has evolved the admissions service to better serve applicants and broaden participation, including rapid digitisation of the entire admissions process, adding services like Adjustment, the introduction of the data-driven Clearing Plus tool, and more recently, giving applicants the ability to release themselves into Clearing – which helps them navigate the myriad of available options. Earlier this year also saw the launch of a tool offering transparency of historical grades held on entry. And from May 2022, applicants will apply and track their application via a new modern user interface.

Given our commitment to constant improvement, UCAS welcomes the Department for Education's consultation on admissions reform in England. This report presents a potential model of post-qualification admissions reform, together with risks that require mitigation, including impact on Scotland, Wales, and Northern Ireland. It does so ahead of the closure of the consultation on 13 May, to inform the public debate and enable further, informed engagement.

Our reimagining of admissions is not recent. UCAS last gathered evidence on reform in 2011/12, and over the last two years, UCAS has worked again with admissions and student recruitment professionals, school leaders, and students across the UK nations to model a reimagined undergraduate admissions system. UCAS' work underpinned the recently published UUK Fair Admissions Review, including several post-qualification admissions models, which this report considers in more detail.

Since the Department for Education's consultation launched in January 2021, UCAS has engaged with over 180 universities and colleges, over 700 teachers and their representative bodies, and nearly 15,000 students. This engagement has shaped our proposed post-qualification admissions model and, critically, highlighted the risks associated with reform – while UCAS welcomes reform, it must not create problems worse than those it is seeking to address.

In our engagement with students, over 70% said they would prefer to apply to university before they sat their exams or got their results, with the majority saying this would give them longer to make life-changing decisions. It is clear the introduction of a post-results application model poses risks to student retention – new analysis by UCAS has identified that students who have a shorter relationship with a university or college are more likely to drop out, posing significant risks to their success.

13,000 students responded to our survey

(Source: YouthSight 'Students' perspective on reform' survey, 2021)



On the whole, universities and colleges embrace continued improvement to admissions. However, significant apprehensions have been voiced around the emphasis on grades as the only measure of suitability for a course and the ability to implement post-qualification applications for English students, with 74% of providers confirming a preference for a single approach that works for all domestic and international students. This is a concern echoed by 65% of teachers and advisers, who are equally concerned that compression of the application and selection period into summer is impractical, especially for students who require support arrangements to be put in place.

Based on this engagement, our report recommends a **post-qualification offer-making model (PQO)**, but only if critical areas of risk can be addressed, namely:

- increasing 'in person' advice and guidance, especially for disadvantaged students, over the newly critical offer period in August, given our research finds 85% of students speak to their teachers about making university decisions and will, therefore, expect and require more extensive support in this period which becomes critical in a PQO model.
- > preserving the benefits of a cross-UK model for admissions, as in 2020, 180,000 applications were submitted from one UK nation to a university or college in another UK nation. It is important that reform encompasses admissions across the UK, with our engagement finding specific challenges in Scotland, which will require additional Department for Education consultation.
- maintaining international competitiveness of UK education, given in 2020 over 150,000 students from outside the UK applied to over 300 UK universities and colleges, with 93% of international teacher and advisers rating their experience of the UCAS service as 'good' or 'excellent'. The message from students is also clear 56% believe all should apply the same way, and only 12% felt international students should be subject to a different process. Admissions reform cannot create fragmentation or compression of processes associated with international students.
- ensuring universities and colleges can plan and manage undergraduate admissions effectively, with information available to help forecast and prepare for incoming cohorts.

NEARLY

f students spend over three months choosing the niversities or colleges they want to apply to, with male tudents and those in lower POLAR quintiles taking less time

(Source: YouthSight 'Students' perspective on reform' survey, 2021)

The model in the Department for Education's consultation **we have ruled out is a strict 'post-qualification applications' model**, which involves moving the entire application process to after exam results. This would result in significant changes to the academic year and moving to a January start date for those applying after their A level or Scottish Higher results, resulting in:

- a five to six month gap between taking exams and progressing to university or college with little support or maintenance, impacting disadvantaged students in particular.
- moving us out of line internationally, causing UK HE to be less competitive globally.
- compression of the whole admissions process to a few months, reducing teacher support during exploratory phases, while making choices, as interviews are being conducted, and decisions are being made.

UCAS supports continued admissions reform regardless of the outcome of the Department for Education's consultation, especially in relation to simplification of key UCAS deadlines and greater visibility of apprenticeships, so that students can make well informed choices they feel are right for them, based on all the options. In the coming months and years, UCAS will work with universities and colleges to consider the benefits of:

 moving application and deadline dates to give students more time to consider their options and make better informed choices.

- simplify the overall process to enhance the range of choice available to students, including reviewing how Extra, the firm and insurance choice and Adjustment operate, along with a review of the current restrictions on the number of applications.
- capturing and sharing more data to enhance universities' and colleges' understanding of applicants.
- broadening the range of destinations students can engage with via UCAS, including a more integrated approach to apprenticeships and other routes, such as modular learning.
- continued investment in recent innovations to increase transparency and student choice, this includes enhancing the 'historic entry grades' tool, Clearing Plus and the student Hub offering a truly personalised, integrated experience.

Finally, as we emerge from two years of disrupted exams and learning, due to the COVID-19 pandemic, **the timing of reform implementation is critical**. The impact of the pandemic will continue for years to come for applicants, teachers, advisers, universities, and colleges. Addressing this will be the priority for all of us in education. Any significant change would have to be agreed with enough time for universities and colleges to plan, and applicants and teachers to know the 'rules of the game'. As a result, UCAS' recommendations, set out in more detail below, is the detail of reform to be agreed in 2021 to enable a smooth transition for those starting their application in 2024.



SECTION TWO: WHY IS POST-QUALIFICATION ADMISSIONS BEING CONSIDERED?



GUIDING PRINCIPLES

The Schwartz Review in 2004 summarised what the UK admissions system should strive to achieve as: 'a fair admissions system is one that provides equal opportunity for all individuals, regardless of background, to gain admission to a course suited to their ability and aspirations'.

When considering the Department for Education's proposals and consultation on post-qualification admissions, UCAS has been guided by the following principles, stemming from UCAS' strategic ambition to 'inspire and empower people to make aspirational choices about higher education and learning':

- encouraging students to easily explore a wide range of options across the UK
- providing sufficient time to engage with shortlisted choices, supporting effective transition to their next step in education
- inspiring students to reach their full potential and supporting their access to higher education and future learning
- transparency about entry conditions, along with how offers and decisions are made
- empowering students to exercise choice simply and easily within a framework that protects their interests
- > enabling universities and colleges to plan and manage undergraduate admissions effectively.

Admissions reform provides an opportunity to enhance the system further, ensuring it is fair and trusted by students, retains public confidence, and supports the smooth running of admissions decisions by universities and colleges.

WHAT ARE THE MOTIVATIONS FOR REFORM?

The Department for Education's consultation on post qualification admissions cites the following areas as motivations for reform:

- inaccuracy of predicted grades: On average, 18 year old UK students studying A levels are predicted 2.35 A level grades above their achieved grades. Using UCAS data, the consultation states that 79% of individuals had predicted grades which were overpredicted, and 8% were underpredicted, with a view that this presents risks in relation to 'undermatching', particularly by disadvantaged students.
- simplicity and transparency: A variance between published entry requirements and the levels of attainment accepted by higher education providers exists, with 49% of 18 year old applicants holding three A levels accepted below the published criteria. The consultation also notes the differing ways in which applicants can secure a place, with Clearing and Adjustment cited as areas of complexity that could be simplified through reform.
- unconditional offers: While this kind of offer has commonly been used for mature students and creative subjects historically, the proportion of applicants who receive an unconditional offer with pending qualifications has increased significantly in recent years, growing from 1.1% in 2013, to 39.8% in 2020. Of particular note are 'conditional unconditional' offers in 2019, 25.19% of UK 18 year old applicants received one of these. The consultation also cites concerns about the impact of unconditional offers on attainment; applicants who accept unconditional offers are 11.5 percentage points more likely to miss their predicted grades by three or more grades¹.

Other commonly cited motivations for reform include:

- > data showing a 'slowing down' in progress in widening participation.
- > promoting greater choice to students, allowing them to make their decisions later in the process.
- > promoting a greater range of choice to students through the inclusion of a broader range of post-secondary opportunities, including apprenticeships.

¹ Analysis based on English 18 year olds, a group who typically apply with qualifications pending www.ucas.com/file/292731/ download?token=mvFM1ghk



73%

of students favour completing their application before their exams, with students from state schools and lower quintiles more in favour of applying this way.

(Source: YouthSight 'Students' perspective on reform' survey, 2021)



APPLYING SCHWARTZ AND UCAS PRINCIPLES TO POST-QUALIFICATION ADMISSIONS REFORM

Assessing both the current process and a post-qualification admissions model against these principles highlights opportunities for reform to offer improvements.

Encouraging students to easily explore a wide range of options across the UK, and providing sufficient time to engage with shortlisted choices, supporting effective transition to their next step in education.

There is evidence to suggest that the longevity and quality of a relationship between a university or college and an applicant influences their likelihood to complete their course. The closest to a post-results application process UCAS has today is Direct to Clearing, and the analysis of this shows that 16% percent of these applicants drop out before their second year of study – a trend apparent across all tariff bands. This compares to 6% for other Clearing applicants and 5% for firm choice students. Whilst Direct to Clearing applicants typically have characteristics associated with higher rates of non-continuation (lower attainment, typically more mature), these results may indicate that insufficient time for exploration, support during this exploration, and building of a relationship with a university or college, detrimentally impacts their success. This is detailed further in Annex C which can be found on ucas.com.

Extending this idea, UCAS' report in March 2021, *Where Next?*, found students begin thinking about higher education and apprenticeships as early as primary school, and from UCAS' work across the student Hub, events, social media platforms, and other engagement, it is found that students typically explore their options for 18 months before applying. Teachers and advisers, therefore, spend significant lesson time ensuring this exploration is supported and done in a considered way, in the lead up to five choices being made during term time. Keeping this period of exploration will be critical as part of admissions reform, as well as ensuring as much of it as possible takes place when students are in school and have access to support.

The Direct to Clearing data, and student behaviours we observe currently, challenge the notion that better decisions would be made if applications were submitted later on in the process. Any reformed system should ensure, therefore, that students remain encouraged to engage with research well before submitting an application, and that engagement time post-application is preserved.

Inspiring students to reach their full potential and supporting their access to higher education and future learning

Significant progress has been made in widening participation since 2010, when 18 year olds living in the highest participation areas (POLAR 4 Q5) were 3.18 times more likely to be accepted to higher education than those from the lowest (POLAR 4 Q1). In each year since 2010, this ratio has improved, down to 2.20 in 2020, although progress has started to slow since 2015. By removing predicted grades and acting upon a student's ability, post-qualification admissions reform has the potential to contribute to improvement – leading to promoting aspiration by keeping a greater amount of choice and flexibility later in the admissions process.

Looking at attainment, there are concerns that the current practice of unconditional offer-making is limiting achievement, as outlined above. Further analysis also shows that students respond to a target or offer – for example, English 18 year old applicants who are predicted AAA are 1.45 times more likely to achieve those grades (or better) if their offer is at their predicted grades (or above), compared to if their firm choice offer is ABB².

While a post-qualification model could remove the opportunity for unconditional and conditional unconditional offer-making, and the associated impact on attainment, there is a clear need to balance this with a motivating target for students. This must not be at the cost of widening access efforts – not only has progress slowed, but UK demographics are shifting, with the 18 year old population set to increase markedly over the next decade. To eliminate conditional unconditional offers, caution is needed to avoid pivoting to a system reduced to selection based on grades alone, which would risk those from advantaged backgrounds benefiting disproportionately.

Transparency about entry conditions, along with how offers and decisions are made

Uncertainty around the accuracy of predicted grades, and ambiguity around the extent to which higher education providers will accept offer holders whose grades fall short of published entry requirements, remain a concern for students. Our *Through the Student Lens* report in 2016 highlighted that 49% of the survey respondents who had chosen not to apply to a high tariff university had done so because of the perception that the grade requirements were too high. This demonstrates that post-qualification admissions could improve the current system where students take decisions before they have access to all relevant information, including their achieved grades, and as a result, some students are potentially missing out.

Steps have been taken to enhance transparency on entry requirements, with the release in 2021 of the historical grades on entry tool for teachers and advisers. However, there is still work to be done in the sector to improve the understanding of other factors which influence university and college decisions.

While removing the need for predicted grades, UCAS agrees with admissions practitioners, teachers, and advisers, that a shift to a post-qualification admissions model should not result in offers being made solely on achieved grades – perceived as a potential outcome of condensing the time available for selection activities. An effective admissions system is far more than just the alignment of an applicant's grades with course entry requirements, and maintaining the ability for students to use a range of information to inform their application is also important, including employer or academic references, extracurricular activities, passion of the subject, and their personal statement. The process should make students feel empowered and confident in making aspirational choices, rather than being discouraged from pursuing their preferred options and regretful of their choices at the end of the process.

² This analysis, including full inclusion criteria, is detailed on ucas.com in Annex D





Empowering students to exercise choice simply and easily within a framework that protects their interests

As outlined in the Schwartz Principles for Fair Admissions, barriers to participation should be minimised. An effective system should always be able to support an applicant who wants to be placed on an opportunity at a provider who would like to recruit them. However, in the 2020 cycle, 9% of applicants received no offers at all.

For these applicants, and those that find themselves with multiple rejections, efforts have been made to offer support, with UCAS Extra offering an opportunity for applicants to seek an alternative opportunity, and a new mechanism being introduced for applicants who are successfully placed to release themselves and find a place elsewhere. This proved popular, with over 30% of main scheme applicants that were placed through Clearing in 2019 having used decline my place.

A post-qualification admissions model that sees application making post-results may compromise a student's ability to exercise choice due to the limited timescales. A successful process should promote choice – throughout the cycle, and across the range of pathways available: this promotion of choice should be beyond traditional undergraduate study, covering the full range of post-secondary opportunities, including apprenticeships, technical, and modular education.

Enabling universities and colleges to plan and manage undergraduate admissions effectively

To provide the best student experience, and ensure academic and financial sustainability, universities and colleges need to be able to plan intakes effectively. Admissions decisions throughout the cycle are made with incomplete information, but a long history of institutional and national data allows for effective planning at course and provider level. This data, from application numbers to in-cycle touchpoints, support the forecasting which informs all manner of planning processes – including ensuring sufficient teaching staff, accommodation provision, and appropriate support services. An inability to plan effectively could have a significant negative impact on the student experience.

A strict post-qualification application system (as described in the Department for Education's consultation) would not give universities and colleges any early sight of likely demand, and risks around over or under recruitment would only become visible during the results period. Students could suffer significant disappointment and replanning whilst smaller and specialist providers could potentially become unviable if they were unable to gain a sense of demand and plan accordingly throughout the year.

Under UCAS' proposed post-qualification offers model (detailed in the next section), universities and colleges would see application information – including visibility of applicants intending to exercise their choice – well in advance of results, and would be able to plan accordingly. UCAS would also supplement this data with sector-level in-cycle data analysis and insight, where appropriate. This would not only ensure universities' and colleges' financial sustainability, but also enable them to enter the results period with a developed sense of their recruitment picture, ensuring results decisions are informed and efficient.

SECTION THREE UCAS' PROPOSED MODEL FOR REFORM



UCAS has evolved the Department for Education's post-qualification offer-making model to build in some critical differences: allowing universities and colleges to view applications straight after submission paving the way for assessment and relationship building, and allowing applicants to replace choices throughout the cycle, with a view to taking as many credible applications through to the summer as possible.

This model is the result of exploration of several ways a post-qualification admissions model could be implemented, and assessed potential impacts through extensive engagement with customers and stakeholders. A summary can be found in Annex A.

UCAS believes a **post-qualification offer-making model** potentially offers the most practical and beneficial solution to students, and better fulfils the principles outlined in section two by:

- > allowing sufficient time for students to engage with university and college choices and set themselves up for effective transition to higher education
- > supporting decision-making on the basis of full and complete information
- > enhancing opportunities for students to exercise choice simply and easily within a framework that protects their interests
- > offering the motivating factor of an in-flight application, incentivising students to reach their full potential
- > offering early insight into application trends for universities and colleges

Admissions reform provides an opportunity to enhance the system further, ensuring it is fair and trusted by students, retains public confidence, and supports the smooth running of admissions decisions by universities and colleges.

However, significant potential issues remain, including:

- the availability of extended support for students from schools and colleges during the summer period following the publication of examination results
- > the maintenance of a UK-wide system, allowing students to have complete choice across the UK in an efficient and transparent manner
- > the treatment and inclusion of international students, and maintenance of the UK's competitive position in the global student recruitment market

These issues are explored further on page 14.

UCAS' POST-QUALIFICATION OFFER-MAKING MODEL

In its most basic form, a postqualification offer-making (PQO) model allows students to begin researching universities and courses, along broadly similar timelines as the current model, with them submitting their application prior to sitting exams. At the point where an applicant receives their examination results, a university or college will choose to issue an offer based on their achievement, alongside other holistic factors.

UCAS' evolved post-qualification offer-making model is outlined right, along with an overview of the key benefits.

Research to understand pathways, routes and options, and what's needed to access them **START OF (ACADEMIC) YEAR BEFORE HIGHER EDUCATION** Complete info profile with UCAS and confirm first set of choices APP ONE APP TWO LAST APP **THROUGHOUT YEAR:** THROUGHOUT YEAR: **REVIEW CHOICES TWO-WAY ENGAGEMENT WITH CHOICES** > Replace unsuccessful choices > Are you a good match? > Options to change your mind > Extra support needs? > Interviews? Assessments? APP ONE APP WO LAST APP > Visas? Fees? *Universities and colleges might confirm unsuccessful decisions (eq after interview) **NEW APP EXAM RESULTS** You or UCAS share results with unis and colleges who decide whether to make an offer WHEN YOU HAVE ALL DECISIONS Decide which offer to accept IF YOU APPLY LATE, DON'T RECEIVE AN OFFER, OR CHANGE YOUR MIND Use Summer Application Scheme to secure a place

2+ YEARS BEFORE APPLICATION

DIAGRAM 1: UCAS POST-QUALIFICATION OFFER-MAKING MODEL



700/0 of students send an enquiry to a university or college during the application process

(Source: YouthSight 'Students' perspective on reform' survey, 2021,

ENGAGEMENT WITH SHORTLISTED CHOICES

UCAS' model sees applications submitted from the September before the student intends to enrol – following an extensive period of research, in line with current timescales. Maintaining this timeframe enables:

- universities and colleges to develop an understanding of the potential, skills, and attributes each individual applicant has beyond their grade profile alone, through selection processes such as interviews and auditions. This is essential in the cases of highly selective or specialist courses
- applicants with particular support needs to share these with their choices, allowing those universities and colleges to identify their support offer, enabling applicants to make informed and considered decisions about which best meets their needs
- students to understand and work towards the grades that will give them the greatest chance of success, maintaining the benefits of an 'offer' under the current model
- schools face less extensive disruption to the current academic year, and the support required during the summer months is less than compared to a model where applications are completed after exams are taken
- > universities and colleges to gather and monitor data on application numbers and engagement, supported by additional data from UCAS where appropriate, to enable forecasting and planning
- resilience for the sector in the event of any significant global disruptions. The protection offered to students through a long-term relationship with a university or college mitigated some of the impact of COVID-19

By contrast, a post-qualification application model that sees all activity occur after exams significantly reduces the relationship between a university and student, which not only presents risks to retention, but also makes it more challenging for universities to support students with specific needs. Furthermore, it provides significant disruption to the academic year, and would require the availability of extensive support from schools and colleges during the summer months.

6 students thought having a longer time to make university and course decisions was a benefit of the current process

(Source: YouthSight 'Students' perspective on reform' survey, 2021)

MAKING INFORMED DECISIONS

The current decision deadlines ensure universities and colleges and applicants make decisions in spring, often before the full applicant profile and final exam results are known. UCAS' PQO model removes this contraint, and enables complete choice for the applicant, with final decisions only required when all possible relevant information about them is available.

In this model, clear rejections – that is, cases where it is clear that an applicant will not secure a place regardless of eventual grades (such as where they have not taken a required subject, or have not performed well at an interview or audition) – are permitted at any point in the cycle. In such instances, applicants would be able to replace the unsuccessful choice with another option, to maximise their chances of a positive outcome. Allowing this before the summer enables those at school or college to consider their next choice while they have easy access to advice and guidance. Where an application is likely to result in an offer subject to grade outcomes, universities and colleges can only make decisions when they have the full, final applicant profile. Where an applicant is 'qualified', meaning they meet the entry requirements ahead of summer, this model – like the current system – allows them to receive and respond to offers that aren't subject to academic conditions at any time. Equally, it is also only when the applicant has a full and final set of offers that they make their decisions.

As well as aligning to applicants' needs, this model also accommodates different start dates to provide flexibility in higher education delivery. To set appropriate expectations, universities and colleges will need to publish transparent details of their definition of 'qualified'.

ENSURING THAT NO STUDENT IS LEFT BEHIND

In contrast to the DfE model, UCAS' PQO model retains Clearing – or a process like it. Teachers and advisers have been particularly keen to highlight cases of applicants whose personal circumstances change after they have secured a place, and their need for a mechanism to secure an alternative. Equally, universities and colleges require a stage of the process where they are able to recruit to areas where they may have seen reduced demand.

Use of Clearing has improved in recent years, with innovations such as the introduction of decline my place and Clearing Plus. UCAS' model would reimagine Clearing as an intuitive, personalised, and supportive application mechanism that guides applicants through available options, and facilitates connections between them and universities and colleges beyond the point of qualification publication.

SIMPLE AND ACCESSIBLE SYSTEM

The benefit of this model is it offers a single simple approach for admissions which accommodates multiple start dates and varying qualification dates. It seeks to offer a common route into UK higher education with no groups explicitly or implicitly excluded, and reduces the need for students to understand which route applies to them before even starting an application.



SECTION FOUR: CRITICAL CHALLENGES



UCAS believes the above PQO model best addresses the principles of an effective admissions system. However, UCAS can only recommend the implementation of this model if the following critical challenges can be resolved:

INTERNATIONAL STUDENTS

International student recruitment is described as out of scope of the Department for Education's post-qualification admissions consultation. However, UCAS receives applications from students in over 200 countries and territories across the globe. In 2020, UCAS received applications from 52,865 applicants from the EU, and 98,660 applicants from outside the EU, to over 300 universities and colleges across the UK. Approximately 95% of undergraduate entrants from the EU, and 60% of entrants from outside the EU apply through UCAS. The implementation of an admissions process that reduces the UK's competitive position or encourages bypassing would be detrimental to the UK's stated ambition to attract 600,000 international students to study in the UK each year.

These students come from varying educational settings, with some applying pre-qualified, while others apply with achieved qualifications and receive unconditional offers. Typically, around two fifths of students applying from outside the UK will have pending qualifications, and between 80 and 90% of them will receive a conditional offer.

There are significant benefits of international students following a joined-up process with domestic students, including:

- > a single, accessible gateway to over 300 universities and colleges is easier for students to navigate, which many of the UK's global student recruitment competitor nations do not have
- > greater fairness and transparency to all students, ensuring they are processed and assessed on a consistent basis
- better data and insight into the level of demand for UK higher education, allowing for the identification and targeting of emerging markets

Maintaining the UK's competitiveness is crucial, as international student recruitment is a highly competitive global market. It is common for international students to have concurrent applications elsewhere – our survey of international applicants indicates that 58% of EU respondents, and 65% of non-EU respondents, also applied outside the UK. Evidence suggests that international students seek to have certainty as early as possible, and that the receipt of a conditional offer allows for this.



International student recruitment is also more complex than domestic recruitment, with students requiring visas, English language testing, scholarships, and other documentation prior to studying. UCAS is currently developing a new service, called Myriad, to address this complexity, but admissions reform will have an impact. This complexity often relies on a student receiving a university offer before they can begin. Compression of admissions timelines through admission reform, and delays to university offers until later in the process, would create new challenges.

There are four potential options to help mitigate the impact on international students when implementing postqualification admissions reform:

- 1. Maintain an offer-based model allowing international applicants to receive early offers, and subsequent processes to commence.
- 2. Move to an unconditional offer-based model with universities and colleges able to confirm applicants early, providing greater certainty to international students. This also removes challenges associated with predicted grades.
- **3.** Include fully within a post-qualification offer-making model with pre-qualified students subject to this, accepting the risk that this may influence the competitiveness of UK higher education.
- **4.** Introduce a national admissions test to allow for consistent management through the introduction of a mandatory international student test, all would have a pending qualification, and therefore could be accommodated uniformly as part of a post-qualification system.

With all of the above options, the education sector would first need to agree on a definition of an 'international student' to understand what system they would be subject to. The debate on fee status assessments has shown basing this simply on geography or domicile can be overly simplistic and is legally complex.



of students speak to their teachers and advisers about their university choices, and 2/3 did so on a regular basis. Those in fee paying schools, and higher quintile groups, were more likely to speak to school staff

(Source: YouthSight 'Students' perspective on reform' survey, 2021)

AVAILABILITY OF SUPPORT FROM SCHOOLS AND COLLEGES

Under the current model, over half of students apply from a UCAS registered centre – which are typically schools or colleges. Extensive support is available throughout the cycle – particularly around the equal consideration deadlines in October and January and upon confirmation, where teachers and advisers tend to focus their attention on applicants who have been placed into Clearing – in 2020 13.9% of acceptances for UK 18 year olds were via main scheme Clearing.

It is common for schools to offer face-to-face support for students on results days during the summer, and for this support to be broader than just course and careers information, with schools and colleges increasingly offering mental health support, particularly to those who have faced disappointment or do not have the necessary support from their family or guardian.

The move to a post-qualification admissions model shifts the points at which students require support from their school or college, and extends the support required in the summer:

- Under the strict post-qualification application model, much greater support would be required from schools and colleges in the summer for the completion of applications, guidance through the process, and consideration of offers received.
- Under a post-qualification offer-making model, the level of support in January would be broadly similar to now, and additional support would be required in the summer for consideration of offers.

The Department for Education consultation recognises this would be a challenge. UCAS surveys echo this concern, with teachers and advisers highlighting the challenge of providing support in any post-qualification admissions model. 64% believed this challenge was insurmountable under a strict post-qualification application model. UCAS' post-qualification offer-making model attracted more optimism, receiving the highest percentage stating they believed the challenge was not insurmountable, but it still saw 29% of respondents expressing some doubt.

Any risk of reduced support for applicants needs to be mitigated during the implementation of admissions reform. These efforts will vary across the education system to prevent disparities appearing for applicants based on their school or college, and between those who attend a school or college at the point of application and those applying as private candidates.



MAINTAINING A UNITED ADMISSIONS SERVICE ACROSS THE UK

In 2020, 178,465 applications were submitted from one UK nation to a university or college in another UK nation, and 30,350 UK students were accepted in UK nations different to their home nation. The ease of opportunity for students exploring cross-border options is supported by a common application system, reducing the burden of understanding multiple application systems and crafting multiple applications. Student movement across the UK is highlighted in Annex B.

In addition, 48,600 non-UK applicants applied to universities or colleges in different UK nations, using the centralised admissions service as a single gateway to all UK nations.

UK-wide borderless choice is therefore a core part of the current admissions system, allowing applicants to apply across borders without disruption or burden, and our engagement has shown a desire to maintain this from students, schools and higher education providers. Education and qualifications offers across the four nations are different, and any model must account for this. If it does not, the additional burden will likely impact on cross-border flows. Recognising the key structural and pedagogical differences between the Scottish education system and those in England, Wales, and Northern Ireland, UCAS has engaged extensively with Scottish stakeholders in particular to understand the opportunities and challenges of post-qualification admissions in Scotland. This has identified a number of areas to the consider for effective implementation.

- accommodation of a mixture of achieved and pending qualifications, as is common in Scotland, with students achieving higher qualifications in both S5 and S6;
- the possibility that post-qualification admissions could disincentivise students from progressing, or achieving, in S6;
- availability of information, advice and guidance during critical periods, recognising differences in the academic year timetable;
- the operation of a post-qualification system under Scotland's student number control system.

REGULATION OF POST-QUALIFICATION ADMISSIONS

Higher education is a devolved matter, and each UK nation has their own funding council or regulator. Any changes to the admissions model would require thorough examination of the current regulatory framework and its dependencies on the current model. During engagement UCAS has been asked about the enforceability of a postqualification admissions system and whether a university or college would be able to opt-out of a post-qualification model. If they were able, this could potentially destabilise the market. Indeed, in UUK's Fair Admissions Review, a recommendation was made for a new Code of Conduct to ensure admissions reform was adhered to. Whilst UCAS expects universities and colleges that use its services to adhere to the terms of service and business rules, it is an independent charity and shared service, and is not a regulator. Therefore, enforcement of this Code of Conduct could not sit with UCAS although it remains open to engagement with the sector as to how it can best support.

When responding to the responses received in the consultation, the Department for Education should address regulation and enforcement of admissions reform directly, with it likely being necessary to have an additional technical consultation to reach consensus on a way forward.

Visit www.ucas.com/reform for more information

SECTION FIVE: CONCLUSION

As outlined in this report, UCAS is supportive of a move to a postqualification offer-making system as proposed in the Department for Education's consultation. This support is contingent on addressing the issues outlined in section four that pose a significant risk to all students, particularly those from disadvantaged backgrounds, and reduces the UK's competitiveness in the global student recruitment market. UCAS does not support a move to a strict post-qualification application system for the reasons outlined earlier.

Following the publication of this report, UCAS will be hosting a series of roundtables and engagement activities to explore these issues further to inform our full consultation response that will be submitted and published in May. Following this, UCAS will continue its engagement with universities, colleges, schools, students and wider stakeholders regarding reform to the admissions process.

The timetable for implementation of reform would take several years to do so effectively. This is not only because has the sector has to pull together to respond to the pandemic and support students more than ever, it is also important to keep in mind the 2022 entry cycle opens on 18 May 2021, with preparations already underway for the 2023 entry cycle. Any significant change would have to be agreed with enough time for universities and colleges to plan, and applicants and teachers to know the 'rules of the game'. As a result, UCAS' recommendation is for a smooth transition to any new admissions process, and for those starting their application in 2024 to be the first cohort that are affected by the reforms agreed in 2021.

As outlined in this report, regardless of whether admissions reform goes ahead following the Department for Education's consultation, UCAS will continue to focus on improving the service offered to applicants, universities, colleges, employers, and apprenticeship providers.

If you have any questions, comments or thoughts regarding this report or the UCAS admissions service more broadly, please contact **reform@ucas.ac.uk**

ANNEX A: ASSESSMENT OF DIFFERING FORMS OF POST-QUALIFICATION ADMISSIONS

MODEL	BENEFITS	CHALLENGES
Post-qualification applications, with time created for the application process to take place being made by shortening the final year of secondary education and examination period, and through delaying the beginning of the first year of higher education.	 > Offers a strict post-qualification admissions model, with all elements of the application process occurring after results. > Would remove predicted grades entirely from the admissions process. > Removes unconditional offers to applicants with pending qualifications. 	 > Compressed timelines likely to result in HE admissions becoming more mechanistic, increasing the focus on qualification results in isolation. > Reduced period to provide information, advice and guidance to students, and a shorter relationship between the student and provider could impact on quality of decisions. > Significantly reduces the longevity of the student and provider relationship, posing significant risk for retention. > Challenges for specific groups of students, particularly disabled students, where reasonable adjustments would be required. > Would require extended support from schools and colleges after results are published. Uncertainty regarding whether such a model would impact on available teaching time in schools.
Post-qualification applications, with time created for the application process to take place through delaying the start of the first year of higher education until January.	 > Offers a strict post-qualification admissions model, with all elements of the application process occurring after results. > Would remove predicted grades entirely from the admissions process. > Removes unconditional offers to applicants with pending qualifications. 	 > A January start would place the UK at a significant disadvantage in the international student market. > A January start in England, without all four nations adopting, would fragment the UK education system and create new barriers. > We already see an attrition between JCQ results day vand the start of term, with disadvantaged students more likely to drop out. An extended gap of five months would likely heighten this. > Unclear how schools and colleges could offer support, likely needing to extend their relationship with students by five months creating a new 'Year 14'. > Causes unnecessary delays in study for students who are not reliant on academic attainment to progress, such as those assessed by portfolio or audition. > Would lead to a shorter relationship between the university and student, which could impact on retention. UCAS analysis may indicate that those that apply later are more likely to drop out in the first year of study. > Could impact on Advanced Higher participation in Scotland, with students choosing to switch to higher education in January.



Post-qualification decision- making	 > Provides greater choice for students later in the cycle. > Offers a form of PQA that maintains the current academic year structure. > Promotes student choice, allowing them to make ambitious and broad selections, and make decisions at the point they are most informed. > Maintains the benefit of a longer-term relationship between a provider and student. 	 > Would require the use of predicted grades for the making of offers. > Students make decisions knowing their grades, but providers use other information. > Maintaining choice later in the cycle may make initial numbers management more challenging for universities and colleges. However, this could be overcome through central modelling and sharing of information on applicant choices.
Post-qualification offer-making	 > Offers a form of PQA that maintains the current academic year structure. > Promotes student choice, allow them to make ambitious and broad selections and make decisions at the point they are most informed. > Maintains the benefit of a longer-term relationship between a provider and student. > Most accommodating of the full range of UK-wide provision, including apprenticeships, and differing term dates. > Would remove predicted grades entirely from the admissions process. > Removes unconditional offers to applicants with pending qualifications. 	 Immediate support for students from schools and colleges after A level results day would need to be extended. Maintaining choice later in the cycle may make initial numbers management more challenging for universities and colleges. However, this could be overcome through central modelling and sharing of information on applicant choices.

ANNEX B: NUMBER OF APPLICATIONS AND ACCEPTANCES ACROSS BY DOMICILE OF STUDENT AND LOCATION OF PROVIDER IN 2020



PROVIDER COUNTRY		DOMICILE				
		ENGLAND	NORTHERN IRELAND	SCOTLAND	WALES	
ENGLAND	APPLICATIONS	1,737,415	22,990	8,825	47,760	
	ACCEPTANCES	395,630	3,325	1,525	8,225	
NORTHERN IRELAND	APPLICATIONS	1,880	49,015	180	120	
	ACCEPTANCES	360	10,810	15	20	
SCOTLAND	APPLICATIONS	40,420	7,445	178,000	1,235	
	ACCEPTANCES	5,275	800	36,930	150	
WALES	APPLICATIONS	46,240	1,165	205	36,135	
	ACCEPTANCES	10,485	125	45	11,670	

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