

UCAS response to the Department for Education consultation on Post-Qualification Admissions Reform

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Introduction

UCAS is an independent charity that operates across the UK and internationally to provide information, advice, and admissions services to help students to progress to the next stage of education and learning. This service spans undergraduate, postgraduate, technical, and apprenticeship pathways, with the undergraduate service alone supporting over 700,000 students a year from over 200 countries and territories, with more than 400 different verified qualifications, to access UK higher education (HE). We use our data science capabilities to support students in making aspirational choices, most recently through the introduction of Clearing Plus, a service that matches students to appropriate opportunities based on their interests and circumstances, and the student Hub, a personalised information and advice dashboard.

On 21 April, and informed by more than two years of exploratory work with customers and stakeholders, UCAS published its discussion paper, [Reimagining UK admissions](#), proposing its own post-qualification offer-making model (PQO), an evolution of Model 2, 'Model 2b'. Our response to this consultation is based on our April report, which provides additional rationale for our position, and includes further intelligence gathered since publication, such as feedback from three roundtable events attended by senior leaders across secondary and HE, and leaders specialising in both widening access and participation and international recruitment.

In total, our proposals are underpinned by engagement with 180 universities and colleges, over 700 teachers and their representative bodies, and nearly 15,000 students. It also draws on UCAS data from the nearly three million applications each cycle that, in themselves, provide evidence of the patterns and trends in progression to UK HE.

Whilst there could be a different way to manage university and college admissions, a post-qualification admissions system is not a quick fix for enhancing student choice and widening access and participation. Other reforms that support fairness, transparency, and accessibility for students could provide genuine solutions – a theme of feedback during UCAS’ engagement to date and, most recently, our roundtable events. UCAS is committed to working with policy makers, stakeholders, and customers across the UK to transform the admissions system – it must meet the needs of the students of today and tomorrow as they discover their future.

Our response first discusses UCAS’ position on post-qualification admissions, reviewing the proposed models within the consultation document and introducing UCAS’ variation, before considering how accelerating a programme of student-led transformation and reform could address the challenges as outlined in the government’s *The Case for Change*. We conclude by outlining our view on key themes referenced within the consultation document; namely: number of choices, personal statements, predicted grades, international students, and implementation.

The key points within our submission are:

- UCAS proposes a variation of a post-qualification offer model, known hereafter as ‘Model 2b’ in this consultation response. This variation, we believe, operates in the student’s interest by enabling better informed decision-making, whilst allowing HE providers to have foresight of their potential student cohort. We strongly warn against Model 1 or any strict post-qualification applications and offers model as we believe this would have a significant negative impact on disadvantaged students.
- Our support for ‘Model 2b’ is contingent on the resolution of four significant challenges:
 1. An agreed solution that supports international student recruitment and does not impact on the UK’s competitive position
 2. The provision for adequate student support during the crucial post-results offer-making period
 3. Maintaining the benefits of a cross-UK model for admissions
 4. Securing effective regulation of post-qualification admissions, including the protection of students’ rights as consumers
- The magnitude of reform required to implement a post-qualification admissions system cannot be underestimated and should not be rushed. If a move to such a model is agreed in 2021, UCAS’ recommendation is that those starting their application in 2024 would plausibly be the earliest cohort to apply via a post-qualification route.
- Maintaining the status quo is not an option – reform is in UCAS’ DNA, and we are already transforming the admissions service to meet the changing needs of students. Should the above four challenges prove insurmountable, UCAS’ programme of student-led transformation and reform will lead to a radically different experience for students. We will continue to invest in recent innovations to increase transparency and enable student choice by enhancing the ‘historic entry grades’ tool, Clearing Plus and the student Hub, as well as broadening the range of destinations students can engage with via UCAS, namely apprenticeships, higher technical education, and modular study.

Section 1: UCAS' position on post-qualification admissions

In this section, we answer questions 1-19 within the consultation document. We assess each of the models (Models 1 and 2) proposed within the document, before introducing UCAS' variation of a post-qualification offer model, 'Model 2b.'

Model 1: 'post-qualification applications and offers'

UCAS does not support Model 1, which is similar to that proposed and ultimately dismissed by our [Admissions Process Review](#) (APR) in 2011/12. As was concluded through the APR, such a model would result in:

- the wholesale compression of the admissions process from several years to a few months, presenting risks to the student experience which would be acutely felt by disabled students. This view was echoed at UCAS' recent roundtable event by leaders of organisations supporting students, including the Professional Association for disability and inclusivity practitioners (NADP)
- brevity of the relationship between the student and the university or college. This could lead to an increase in dropout rates, particularly in disadvantaged groups – the exact opposite of what we are trying to achieve through reform
- an 'insurmountable' information and advice challenge for schools and colleges. Teachers and advisers would be required to provide support for the entirety of the application process during the summer months

Compression of the admissions process

The safeguarding of the depth and detail of the research, selection and application process is fundamental to the success of reform. Our March 2021 publication, [Where next?](#) found that, whilst one in three applicants first think about HE at primary school, disadvantaged students are more likely to be later than their peers. This can limit their choices, especially for more selective or specialist subjects and higher tariff providers, where specific subjects or combinations of subjects may be required for entry. Two in five students believe more information and advice would have led to them making better choices. Such early, broad, and personalised information and advice simply cannot be accommodated under Model 1 where timeframes become squeezed, creating a highly pressurised summer period.

Further survey analysis finds that nearly 60% of students spend over three months choosing the universities or colleges they want to apply to, with male students and those in lower POLAR quintiles taking less time. Moreover, 53% thought having a longer time to make university and course decisions was a benefit of the current process¹. Our roundtable speakers reinforced the importance of maintaining early engagement, with a number of outreach charities endorsing a sustained 'drip feed' of information and advice to shape and inform decision-making. Model 1 would create a highly mechanical, impersonal, algorithmic process compressed into a few months – highly unsuitable for what are life-changing decisions.

Brevity of the relationship between the student and the university or college

A further insurmountable obstacle embedded within Model 1 is the brevity of the relationship between the student and the university or college. This could have a particularly detrimental impact on students with individual support needs, such as disabled students, where reasonable adjustments may be required. In some cases, these needs may be complex and, in addition to the practical challenges in assessing and implementing such arrangements at high speed, there is also a risk students may not be given the time and space to have what can be difficult conversations, curtailing their progression options to those which are more readily available or

¹ YouthSight 'Students' perspective on reform' survey, 2021

familiar. The ultimate concern here is that students with individual needs may increasingly defer entry, and potentially disengage with HE as a result – or, at least, lower their aspirations.

Similarly, as society becomes more open to discussing mental health, it is now commonplace for students to discuss their support requirements with a university or college during the application process. 3.7% of all UK applicants now declare a mental health condition – up from 0.7% in 2011² – and this early engagement acts as a first, positive step in starting an important conversation with potential university(ies) or college(s) about what they need to thrive once enrolled.

There is also evidence to suggest that the longevity and quality of a relationship between a university or college and a student influences their likelihood of completing their course. The closest to a post-results application process UCAS currently has is Direct to Clearing, where students only apply once the Clearing process is live in the summer; analysis of this shows that 16% percent of these students drop out before their second year of study – a trend apparent at providers across all tariff bands. This compares to 6% for other Clearing students and 5% for firm choice students. Even after controlling the data to recognise the typical characteristics of Direct to Clearing students, their dropout rates remain significantly higher than for other routes into HE, indicating that insufficient time for building a relationship with the university or college poses a risk to retention, with all the concomitant loss of potential, resource, and time³. This is a key factor in our support for a post-qualification offers model.

It is therefore perhaps unsurprising that an analysis of 2017-2020 Clearing data shows that, on average, 49% of 18 year olds from England, Wales and NI placed through Clearing were accepted at a university or college that was one of their five original choices, and, of these, 25% were placed at one of their original course choices. Students and universities and colleges alike favour pre-existing relationships, nurtured over several months⁴.

An ‘insurmountable’ information and advice challenge for schools and colleges

The burden placed on schools and the broader secondary sector would be particularly challenging. Effective information, advice and guidance for young people at this crucial juncture in their lives is a specialist professional activity built on strong relationships between students and their advisers. Under Model 1, the support required for the entirety of the application process, from the completion of applications right through to filtering, selection and consideration of offers received, would all take place in the summer. A UCAS poll of teachers echoes the concern acknowledged within the consultation document, with teachers highlighting the challenge of providing support in any post-qualification admissions model and 64% describing this as ‘insurmountable’ under Model 1⁵.

To accommodate Model 1, and as discussed in the *PQA Delivery and Implementation* section of the consultation, the start of the academic year would need to be adjusted to January. Anything earlier would be impractical, create too much pressure in the system, and lead to significant unintended consequences. However, the consequent five-to-six-month gap between taking exams and progressing to university or college with little financial or emotional support would affect disadvantaged students in particular. A January start would also place the UK at a significant disadvantage in the international student market. Whilst this does provide a post-qualification application model, the immense upheaval, and substantial new issues it presents means that UCAS does not recommend such a model is implemented.

Model 2: ‘pre-qualification applications with post-qualification offers and decisions’

² All UK applicants, UCAS 2020 End of Cycle data

³ See Annex C, analysis of student dropout rates by acceptance route: www.ucas.com/file/440936/download?token=ajK49t4e

⁴ Main scheme Clearing acceptances to an applicant’s main scheme course or provider choice, out of all main scheme Clearing acceptances, averaged across the 2017-2020 application cycles.

⁵ ‘Teachers’ perspective on reform’ poll, UCAS Adviser webinar 17 March 2021

UCAS is broadly supportive of the principles of Model 2, which would address the use of predicted grades within the admissions process, and unconditional offers to students with pending qualifications as outlined in *The Case for Change* within the consultation, but without shrinking the application window for students. This model would allow students to engage with the application process at the earliest opportunity upon embarking on their post-16 studies, and maintain the benefits of in-person support from their teachers and advisers. In turn, schools would face reduced disruption to the academic year, and the support required during the summer months would be less than compared to a model where applications are completed after exams are taken (Model 1).

An additional benefit of Model 2 is that it retains the notion of a motivating target for students in the form of published and transparent entry requirements for their chosen courses. UCAS analysis 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 ABB⁶. Through early and continued engagement with the application process in Model 2, including exposure to advertised entry requirements, students can understand and work towards the grades that will give them the greatest chance of success, maintaining some of the benefits of an ‘offer’ under the current model.

At the same time, students would not need to narrow down to two courses before they got their results, as they do under the current system – they could keep their options open for longer. This would mean students could make choices when they are most informed, with final decisions only required when all possible relevant information is available.

However, Model 2 as proposed in the consultation document would see no application data transferred to universities or colleges until after results are issued. The model therefore cannot accommodate selection processes such as additional admissions tests, interviews and auditions – this would affect, as a minimum, approximately 100,000 students who are invited to interview each year⁷.

It also falls short of maintaining the proven benefits of a longer-term relationship between a student and university or college. This is of further concern when we know that students themselves actively look to build such relationships under the current timetable – 70% of surveyed students contacted one or more of their chosen universities or colleges after submitting their application and prior to receiving their results⁸ – and would, as per Model 1, most acutely impact on students who undertake such early engagement to start a conversation about their support needs.

Equally, universities and colleges would not have any early sight of likely demand, and risks around over or under recruitment would only become visible at results time, posing both risks to the individual institution, and the reputation of the UK HE sector as a whole. Students could suffer significant disappointment and disruption to their plans, 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. Policy makers and regulators would also be blind to any early warning signs, which would limit the effectiveness of any intervention. In summary, to provide the best student experience, and ensure academic and financial sustainability, universities and colleges need to be able to plan intakes effectively.

⁶ See Annex D, UCAS’ initial investigation into the relationship between offer characteristics (including academic offer conditions) and applicant attainment: <https://www.ucas.com/file/440926/download?token=5pVjTWaE>

⁷ Applicants who received at least one invite to interview during the 2018, 2019 and 2020 cycles. The figure was lowest in 2020 due to government restrictions.

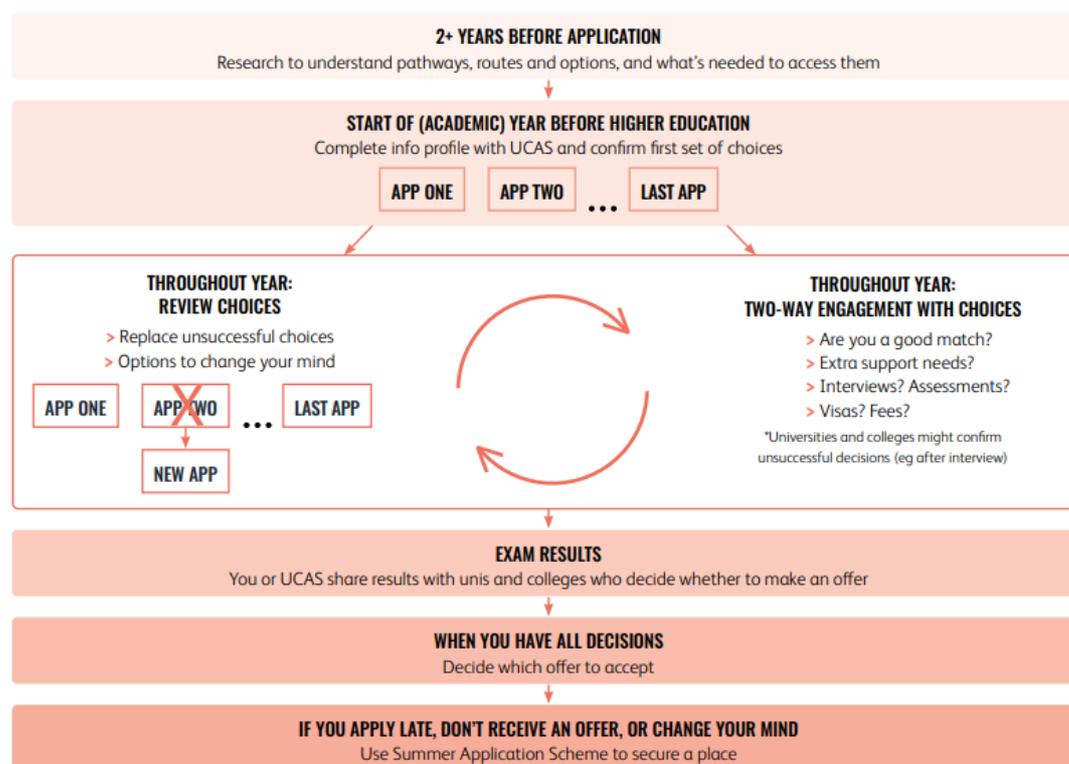
⁸ YouthSight ‘Students’ perspective on reform’ survey, 2021

Proposed UCAS post-qualification offer model: 'Model 2b'

UCAS last gathered evidence on significant structural reform through the APR in 2011/12 and over the last two years we have worked again with customers and stakeholders across the UK nations to model a reimagined undergraduate admissions system. UCAS' modelling underpinned the recently published [UUK Fair Admissions Review](#), including several post-qualification admissions models.

UCAS' work to date led to our proposed post-qualification offer model (below), detailed fully in our [Reimagining UK admissions](#) report. Like Model 2, it is a form of post-qualification admissions, but with some critical differences: allowing universities and colleges to view applications straight after submission, paving the way for assessment and relationship building, and allowing students to replace choices throughout the cycle, with a view to taking as many credible applications through to the summer as possible.

Diagram 1: High level overview of UCAS' proposed post-qualification offer model



The additional benefits to UCAS' Model 2b over those found within Model 2 are as follows:

- Students with individual needs can initiate early discussions with potential choices, ensuring they can feel confident in knowing that they will be able to access any required support. This is important because engagement with NADP has highlighted that disabled students with complex needs are often in discussions with their top two choices from Easter. This also creates time and space for universities and colleges to start to make provision for reasonable adjustments, such as training for academic staff and alternative assessment options, and the transferral of any social services support.
- Universities and colleges can invite students to interviews/ auditions aligned to current timetables. As might be expected, the time between application and offer is longest for

medicine and dentistry degrees, with a median of 26 weeks in 2020, reflecting the additional tests, interviews and assessments involved⁹.

- Clear rejections, in the case of, for example, an unsuccessful audition or interview, are made possible throughout the cycle, minimising needless disappointment for students and maximising transparency for all, as well as enabling more students to get to results day with a broad range of available options.
- Offers and acceptances for ‘qualified’ students are made possible throughout the cycle ensuring students are not unnecessarily blocked from progressing, and making the process more effective for those from different education systems.
- The inclusion of a modern and intelligent Clearing process – the ‘Summer Application Scheme’, recognising its role as an essential application mechanism, with the capability to suggest courses to students based on their preferences, circumstances, and achieved grades. For example, in 2020, a total of 82,915 students were placed through Clearing – a record high. Of these students, 58,160 were unplaced or chose to change their minds, with 18,990 going to Russell Group universities. A further 24,755 chose to apply, and were placed, post-results, including 1,615 at Russell Group universities¹⁰.
- Universities and colleges can gather and monitor data on application numbers and engagement, developing models which enable forecasting and planning, both of which are critical to the sector’s long-term health.
- A common route into UK HE is maintained, with no groups explicitly or implicitly excluded – it is accommodating of opportunities with different and multiple term dates, including apprenticeships.

UCAS believes the above, Model 2b, 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:

- Maintaining the UK’s attractiveness to international students – the development of an agreed solution for the more than 150,000 international students that apply through UCAS each year, maintaining the UK’s attractiveness as a destination amid growing global competition. This is discussed further below.
- Availability of support from schools and colleges – our research finds 85% of students speak to their teachers about making university and college decisions and will, therefore, expect and require more extensive support in the summer¹¹. A poll of teachers found that, whilst UCAS’ model was found to be the most workable, 29% still had doubts as to whether the inevitable uplift in demand for support over the summer could be met¹².
- Maintaining a united admissions service across the UK – a common application system safeguards ease of opportunity for students exploring cross-border options. This must be maintained, with particular consideration given to the Scottish context where differences in systems and approach are greatest. The importance of safeguarding fluidity of cross-border flow was highlighted throughout our engagement and, specifically, by Scottish education leaders at a recent UCAS roundtable event noting that significant numbers of English students were accepted into Scottish (5,275) providers in 2020¹³.
- A new regulatory landscape – the shift to a post-qualification admissions system would require new, enforceable regulation to maintain market stability and ensure that the system works in the interest of students. For example, a post-qualification system would

⁹ Median number of weeks between first instance of an application, and the initial offer decision being recorded, for 2020 main scheme applications where the decision was made on or before 30 June.

¹⁰ 2020 Clearing acceptances split by Clearing route, to all providers and to Russell Group providers only.

¹¹ YouthSight ‘Students’ perspective on reform’ survey, 2021

¹² Teachers’ perspective on reform’ poll, UCAS Adviser webinar 17 March 2021

¹³ See Annex B, Number of applications and acceptances across by domicile of student and location of provider: www.ucas.com/file/440906/download?token=xYT93dPW

see the point at which an offer is accepted (and therefore a legal contract formed) delayed. Reform will need to be accompanied by new advice and guidance from the Competition and Markets Authority (CMA) to safeguard students' rights as consumers.

Since publication of our [Reimagining UK admissions](#) report, we have explored the above critical challenges further. While sector wide commitment and collaboration appear to offer a way to mitigate against the issues around regulation and the provision of support over the summer, safeguarding the UK's international competitiveness and retaining a united admissions service across the UK continue to pose fundamental risks to the success of any post-qualification model. Without resolution, we recommend exploring further alternative steps to address the specific challenges highlighted within the consultation (see Section 2).

Section 2: Solving the challenges through a programme of student-led transformation and reform

In this section, we consider how accelerating transformational reform could address the challenges as outlined in *The Case for Change*; namely, inaccuracy of predicted grades, unhelpful offer-making practices, simplicity and transparency, and widening access and participation.

UCAS has continuously reformed our service to better support students. Innovations recently introduced by UCAS include:

- Student Hub – a personalised information and advice dashboard that provides students with the tools and information they need to start their journey to HE
- Decline my place – a service giving students full control over their application choices
- Clearing Plus – a data-led system that intelligently suggests courses to students based on their preferences, circumstances, and achieved grades
- ‘Historic entry grades’ tool – providing advisers insight into the grades students held when they were accepted on to courses during the 2017-2019 application cycles, enhancing transparency across the sector
- The 2022 application – improved look and feel to the application interface to give students an enhanced digital experience.

If a post-qualification admissions model proves unachievable, we would want to initiate engagement with the sector promptly to deliver the following enhancements from as early as 2021. The below are anchored in UCAS’ strategy, [Discover Your Future](#), which sets out our aim to support students in exploring all post-secondary education options, including apprenticeships.

Challenge	Potential steps to resolve
Inaccuracy of predicted grades	<ul style="list-style-type: none"> • review the format of predicted grades, with consultation on the introduction of the use of a range as opposed to a single grade point • development of sector-wide consensus as to a common approach for arriving at predicted grades e.g. through the use of formative/summative assessments • further promotion and development of UCAS’ centre-level accuracy reports, which allow schools and colleges to benchmark the accuracy of their predicted grades against the wider secondary sector • consideration as to whether predicted grades could be supplemented by data-driven modelling based on Level 2 or SCQF Level 5 attainment data • consultation about whether there remains a need for predicted grades, and what the impact of their removal could be. Initial consideration suggests the removal of predicted grades would likely result in an increase in the use of alternative assessment techniques, such as admission tests and interviews, greater use of GCSE and National 5 qualifications, and changes to offer-making practices.
Unhelpful offer making practices e.g. Unconditional offers	<ul style="list-style-type: none"> • self-regulation via the development of UUK’s proposed ‘code of practice’ to encompass expectations around the inappropriate use of unconditional offers • building on the success of Condition Z3 in eliminating conditional unconditional offers, further regulation could curtail the broader use of unconditional offers where inappropriate

<p>Simplicity and transparency</p>	<ul style="list-style-type: none"> • update good practice about the use of unconditional offers. • building on the success of timeline changes in 2020 and 2021, moving application and deadline dates to give students more time to consider their options and make better informed choices • simplifying the overall process to enhance the range of choice available to students, including reviewing how Extra, firm and insurance choices, and Adjustment operate, along with a review of the current restrictions on the number of applications • 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 • restructuring of the application form to maximise accessibility for students (e.g. review of the personal statement – discussed below – and a more structured approach to the UCAS reference) • broadening the range of destinations students can engage with via UCAS, including a more integrated approach to apprenticeships, higher technical education, and modular study • greater transparency on the information used by universities and colleges in the assessment of students, including the personal statement.
<p>Widening access and participation</p> <p>Noting the recommendations from within UCAS' What Happened to the COVID cohort? and Where Next? publications</p>	<ul style="list-style-type: none"> • work with widening access and participation organisations and charities to encourage reflection and understanding of post-secondary options at an earlier stage of the student lifecycle (e.g. by embedding mentoring and buddying services within the student Hub) • enhance understanding of an individual's circumstances through improving the information UCAS collects from students, including disability, learning difference and mental health, gender identity, free school meal status, refugee status, whether they are veterans or Service children, have care or parenting responsibilities, or are estranged from their parents • adopt UCAS' Multiple Equality Measure (MEM) as the default mechanism for measuring participation to provide a true sense of progress • ensure outreach, marketing, and recruitment is subject-specific, includes priority groups and is embedded within primary schools and early secondary years

Section 3: Thematic issues

In this section, UCAS explores specific themes arising from within the *Further Questions* section of the consultation document; namely, number of choices, personal statements, predicted grades, international students and implementation. These are discussed in the context of both a shift to UCAS' proposed post-qualification offers model and a model with student-led transformational reform.

Number of choices¹⁴

There is evidence that a focused number of initial choices are beneficial – students are most likely to say that they are committed to two choices (31%) followed by three choices (25%).¹⁵ Given that less than a fifth (19%) of students are happy to go to all five choices¹⁶, limitless choice at the initial application stage would appear unhelpful.

A successful process should promote choice throughout the cycle for both the 9% of students who received no offers in 2020 and the 6% who, despite receiving one offer or more, ultimately ended up studying at a different university or college or course¹⁷. For these students, UCAS Extra allows them to add new choices post-submission, and innovations in Clearing, including the 'decline my place' functionality and Clearing Plus, support students to find new opportunities post-results.

UCAS' Model 2b, would limit initial choices to a number which evidence indicates is widely effective, while providing flexibility for those who are unsuccessful in some of their choices or change their minds as they progress. Equally, should a post-qualification system prove unachievable, UCAS will look to review restrictions on the number of applications within the context of the an admissions model whereby students receive offers prior to results.

Personal statements¹⁸

An effective admissions system is far more than just the alignment of a student's grades with course entry requirements. Everyone applying to university or college should be able to articulate why they want to pursue a particular subject, and a personal statement gives students the opportunity to express their interests in their own words.

Students tell us that they often find the process of writing personal statements daunting, but ultimately worthwhile, as it gives them time to focus on their research and reasons for choosing their path for their next step in life. This activity also supports their readiness for the higher level of learning they will undertake, and many students take immense pride in their completed personal statements.

Similarly, advisers are of the view that personal statements are an important exercise for students to reflect on whether they really want to apply for the course. Their role in providing invaluable support is recognised, with teachers cited as the 'biggest help' by around half of students, followed by parents/carers (15%) and friends (12%)¹⁹. Overall, more than two thirds of

¹⁴ Question 15: 'Should there still be limits on how many courses they can apply to?'

¹⁵ YouthSight 'Students' perspective on reform' survey, 2021

¹⁶ YouthSight 'Students' perspective on reform' survey, 2021

¹⁷ The proportion of all mainscheme applicants who received an offer from one of their mainscheme choice university or colleges and were subsequently placed at a different university or college. These applicants were mainly accepted via mainscheme clearing or Extra.

¹⁸ Question 2: 'Should personal statements be removed from the application process?'

¹⁹ Weighted proportion of placed applicants from the 2020 cycle with 16,000 responses. Question asked was: 'Who was the biggest help during each of the following stages of the application process? Completing your personal statement'.

students report receiving ‘a lot of’ or a ‘fair amount’ of support in writing their personal statements, with this being equally applicable across POLAR quintiles²⁰.

A risk associated with any form of post-qualification admissions system is that HE admissions becomes more mechanistic in nature, with a greater focus on results in isolation. It is UCAS’ view that sustaining and indeed growing and evolving the body of contextual data and information that sits alongside results, including the personal statement, is critical to continuing to further the sector’s progress in widening access and participation. This view is shared by students, with 55% believing ‘information such as where you grew up and the type of school you went to’ to be equally or more important than qualifications and grades²¹.

UCAS sees value in exploring how the personal statement might evolve to better meet the needs of customers. Options under consideration include a shorter, more structured approach, with for example, a selection of questions for specific courses, or limiting the requirement to produce a personal statement to certain subjects, courses, or universities/colleges. Such reform is possible within either the context of a post-qualification system or a programme of student-led transformation and reform.

Predicted grades²²

The inaccuracy of predicted grades, and ambiguity around the extent to which universities and colleges will accept offer holders whose grades fall short of published entry requirements, remain a concern for students. Our 2016 [Through the Student Lens](#) report highlighted that 49% of the survey respondents who had chosen not to apply to a higher tariff university had made that choice because of the perception that the grade requirements were too high. Equally, a more recent survey of 2020 students found that more than three quarters apply to courses with entry requirements that are similar to or lower than their predicted grades²³, which could unnecessarily limit their options.

However, students do not always have to meet the entry requirements with their predicted grades to receive an offer – universities and colleges assess applications on an individual basis. Equally, universities and colleges already place differing levels of importance on predicted grades. For example, the University of Cardiff does not consider predicted grades within its admissions decisions and assesses applications based on qualifications being undertaken (subject requirements), achieved qualifications, typically GCSEs, and a range of contextual data and information.

Equally, it is important to remember that schools typically maintain various sets of predicted grades that all serve different purposes and are issued at different points in a pupil’s schooling. For example, those given to awarding bodies are typically provided later in the year than those provided to UCAS and school leaders will often have sophisticated data solutions to model, track and evaluate progress against target grades throughout pupils’ education.

Above all, there will always be an innate wish for students and their parents to seek to understand a student’s aptitude and potential. It is therefore unrealistic to suggest that the shift to a post-qualification model would put an out-and-out stop to the use of predicted grades. A

²⁰ Weighted proportion of applicants from the 2020 cycle with 4,000 responses. Question asked was: ‘How much support did you get with your personal statement? By support, we mean any help you had from others when writing your personal statement. This could include guidance with information to include in your personal statement, proofreading from teachers, friends and family, or advice from UCAS or online sources.’

²¹ Weighted proportion of applicants from the 2020 cycle with 4,000 responses. Question asked was: ‘Do you think universities should consider other information, such as where you grew up and the type of school you went to, as well as your qualifications and grades?’

²² Question 3: ‘Please provide your views on the impact of schools and colleges no longer using predicted grades to guide students in their higher education choices’

²³ Weighted proportion of applicants from the 2020 cycle with 2,420 responses. Question asked was: ‘Which of the following best describes the entry requirements of your chosen course(s)?’

more likely scenario is that predicted grades of sorts still form part of conversations between advisers and their students in the context of exploring their options early in the research process with the potential to reposition these accordingly, for example to promote the use of grade ranges or ‘target’ grades in the context of transparent entry requirements.

UCAS would work with advisers, secondary sector representative bodies and careers advisers to ensure all are fully prepared to support students in making informed and aspirational choices in the absence of predicted grades within the context of a post-qualification model. Similarly, and as outlined above, UCAS would pursue a programme of reform to address the acknowledged challenges presented by the role of predicted grades if they are retained as part of the core admissions process.

International students²⁴

The admissions system needs to work for all students – UK and international alike – who have the potential to benefit from UK HE.

Whilst it is the case that some international students apply directly to universities and colleges and/or through agent networks, the majority make use of the UK’s central application service – approximately 95% of undergraduate entrants from the EU, and 60% of entrants from outside the EU apply through UCAS²⁵ – and UCAS applicants report the highest overall positive experience relative to other routes.²⁶

At a UCAS roundtable event specifically focused on international recruitment, attendees confirmed that to label international as ‘out of scope’ is unrealistic – anything that affects domestic students will inevitably impact on international students, regardless of their differing needs. In our [Reimagining UK admissions](#) report, we offer four potential options for consideration²⁷.

Whilst no option was considered by education sector leaders to be without challenge, concerns were emphasised around any system where offers are made later in the year. Such a system poses significant risks to the UK’s competitive position in the global student recruitment market, as students who have secured offers in one country may well be unwilling to wait months to see if they have a chance of getting a place in the UK – e.g. the USA, where May 1 is National Decision Day. There is widespread scepticism of the benefits of a national admissions test given the likely associated additional burden that this would entail relative to the attractiveness of other global competitors. Participants also highlighted a risk that an alternative application route could appear to favour international students – a view echoed by over half of the students we surveyed who felt international and domestic students should apply in the same way²⁸.

²⁴ Question 4: ‘International students are not currently in scope of proposed PQA for a number of reasons (international exams work to different timetables outside the UK, many international students do not apply for UK courses via UCAS and international students require additional time ahead of term starts to apply for/be granted visas etc). Do respondents agree this is the correct approach given circumstances? If not, what are the key reasons as to why international applicants should be included in scope?’

²⁵

www.ucas.com/file/320131/download?token=AfU7rqhw#:~:text=The%20report%20covers%20non%2DUK,to%20undergraduate%20courses%20through%20UCAS.&text=Comparisons%20to%20published%20HESA%20data2,as%20being%20accepted%20by%20UCAS

²⁶ Redbrick Student Survey Report, September 2020

²⁷ 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.

²⁸ YouthSight ‘Students’ perspective on reform’ survey, 2021

As outlined above, UCAS' support for a shift towards a post-qualification model is contingent on arriving at an agreed solution for the more than 150,000 international students that apply through UCAS each year. Their experience of applying to UK HE should not be considered in isolation but be an integrated part of future discussions around reform.

Implementation²⁹

The magnitude of reform required to implement a post-qualification admissions system cannot be underestimated and should not be rushed. If a move to such a model is agreed in 2021, UCAS' recommendation is that those starting their application in 2024 would plausibly be the earliest cohort to apply via a post-qualification route.

Students themselves remain cautious about their support for change with over 70% saying they would prefer to apply to university or college before they sat their exams or got their results³⁰. Whilst from a university and college perspective, planning starts at least 18 months before a student sets foot on campus, when universities and college agree their course portfolios, set entry requirements, and review and update their admissions policies.

UCAS' customers also spoke of a preference for a programme of ongoing transformation and change with an aversion to a 'big bang' approach, which may have significant unintended consequences. Such a rationale would allow for the impact of earlier changes to be understood prior to introducing further reform, which is particularly important given that a rising 18 year old population will see around 90,000 additional applicants by 2025.³¹ At our final roundtable, focused on implementation, sector stakeholders also emphasised a preference for a staged and measured approach.

Lastly, we cannot overlook the context of the UK's recovery from the COVID-19 pandemic, the fallout of which is likely to be widespread and long lasting. Addressing this will be the priority for all of us in education – a smooth transition through any reform programme will be essential.

²⁹ Question 6: 'Please provide any additional thoughts, ideas or feedback on the policy proposals outlined in this document.'

³⁰ YouthSight 'Students' perspective on reform' survey, 2021

³¹ <https://www.ucas.com/file/396231/download?token=qcQl7Fyy>