

consultation response

Department for Education – 16-19 Accountability Consultation

UCAS' role is to help learners make informed choices that best suit their aspirations and abilities and maximise their opportunity for success, and to benefit our university and college members, schools, colleges and training providers through the provision of shared services.

UCAS provides information and advice, course information, entry requirements, and application services to around 650,000 applicants to over 360 UK higher education providers (HEPs) each year. These applicants make over 2 million applications to higher education courses of which c. 35,000 are available to choose from. UCAS services support applications for full-time HNCs, HNDs and foundation degrees as well as undergraduate and some postgraduate degrees.

UCAS Progress¹ is a UK provider of course search and application services focused on learners' applications and transition to post-16 education and training. Its online course directory and application services cover a wide range of opportunities and destinations available locally for young people – including academic, vocational and apprenticeships/work-based training. UCAS Progress search and search & apply currently operate across 76 local authorities in England and 1 in Wales. Services are used by around 2,180 schools and colleges and available to over 245,000 learners (and their parents).

UCAS welcomes the opportunity to comment on accountability arrangements for providers of 16-19 education. We support any initiative that strives to enhance the progression prospects of learners and ensures that learners undertake highly valued qualifications that facilitate access to wide range of progression routes, including higher education.

UCAS would like to make a number of general comments regarding the consultation before answering specific questions that are of particular relevance to UCAS.

Case for change

When discussing the rationale for reforming 16-19 accountability measures, the consultation document states the following:

<p>3.2 We need to make sure students can choose the provision that will best help them to achieve their ambitions. To do that, students and parents need accurate and understandable information on a) what courses and qualifications are most beneficial to them; and b) which providers are best for their chosen courses and qualifications.</p>

The consultation highlights in the Visions and Aims the need to provide clear, reliable information to students and parents that allows them to make informed decisions. Whilst

¹ <https://www.ucasprogress.com/>

UCAS acknowledges that the proposed top line and performance data on school performance may be a useful reference point for students and parents to assess individual providers. It will not, however, allow them to determine what qualifications or courses are most beneficial to them. The only way this can be achieved is through the provision of high quality, impartial information, advice and guidance being made available to all young people throughout their time in education. Improved information, advice and guidance will also allow this performance data to be used more effectively to fulfil the stated objective. Any post-consultation document released by the Department for Education should contain details of the IAG provision that will support the proposals and UCAS would be happy to provide further support in this area.

16-19 vocational qualifications within performance tables

Throughout the consultation document are a number of references to the recent reform of 16-19 vocational qualifications and their inclusion within performance tables. Although not directly within the scope of the consultation, UCAS would like to make a number of comments in relation to this as they are relevant to the wider performance table agenda.

In July 2012 Matthew Hancock MP released details of the criteria vocational qualifications would have to fulfil in order to be included within school performance tables. One of those criteria was for Applied General Qualifications to receive the public backing of three universities.

The technical guidance published by Department for Education does not appear to provide details regarding the process for this recognition. Awarding organisations have been contacting HEIs directly seeking letters of recognition. Feedback to UCAS from universities suggests that centralisation of this process via higher education sector bodies such as Universities UK would be a more efficient approach.

UCAS also has some concerns regarding the naming of those institutions which endorsed qualifications as this could make inferences about the kinds of progression routes available. There is also a risk that learners may believe that qualifications outside of this performance measure may not assist progression to HE. This is not the case. This policy needs to be explained carefully to schools, parents and advisers to ensure that it is fully understood. UCAS would be happy to assist with this communication.

Destination Measures

The consultation makes reference to the destination measures used to assess school performance, with specific reference to progression to higher education. If progression to higher education is to be used as a performance measure, this data could be more usefully viewed in a wider context that takes into account national and local progression trends.

All progression to higher education, regardless of progression route, timeframe and chosen institution has value. The best positive destination will be the one that is most appropriate for each individual learner at each point in their progression pathway.

Q5. What are your views on the necessity, benefits and implications for students and providers of a best 3 A levels measure?

The consultation proposes a number of performance measures that relate to learners holding purely A level qualifications or mixed programmes. Although UCAS does not feel it appropriate to comment on the specific proposals made in relation to this measure, we would like to suggest that the Department for Education review our response to the previous consultation on the reform of vocational qualifications for 16-19 year olds. In this consultation response we detailed the progression trends of applicants holding a mixed profile of qualifications, such as A levels and BTECs, and note the increase in acceptances for learners holding BTEC qualifications. In 2012 4.7% of UK 18 year olds were accepted for entry holding BTECs. This entry rate has increased 2 percentage points (81% proportionally) since the 2008 cycle. Around half of this increase has been for applicants who hold BTEC qualifications in combination with A levels.

We also note that that the proportion of students taking purely academic qualifications in England has declined from 70% in 2008 to 51% in 2012². This trend may continue if students opt to study vocational qualifications, or a mixture of academic and vocational qualifications, following the introduction of revised A levels in England which might be perceived as 'tougher' than the predecessor qualifications.

Our response to the Department for Education consultation on the reform of vocational qualifications for 16-19 year olds can be found here:

<http://www.ucas.com/sites/default/files/dfc-consultation-vocational-quals-may-2013.pdf>

Q6. Do you agree that the measures set out in annexes A and B should be the top line and additional data published for students studying at levels one, two and three?

Annex A details the following additional measure:

AAB in two and three facilitating subjects at A level – a measure showing the percentages of students who achieve three A levels at grades AAB or higher, two or three of which are in facilitating subjects.

The rationale for this is that “Achieving these grades in facilitating subjects supports progression to top universities.”

UCAS believes that learners should base their Level 3 qualification choices on what is in the best interest for them whilst being supported by high quality information, advice and guidance. It is important the school performance measures do not limit or influence student choice. For instance, students should not be encouraged to take qualifications or subjects on the basis that they are included within an accountability measure. The key consideration should be whether it is appropriate for the individual, their interests, and their future intentions.

² Department for Education (2011). Statistical First Release- Participation in Education, Training and Employment by 16-18 Year Olds in England,
<http://www.education.gov.uk/rsgateway/DB/SFR/s001072/index.shtml>

The Russell Group “Informed Choices” document was designed as source of information and advice for young people to assist them in making their Level 3 qualification choices. The document provides an indication to learners of the sort of subjects they may wish to study post-16 if they have a specific course in mind at higher education. The document discusses a wide range of Level 3 qualifications, such as A levels and BTECs, and details how Russell Group institutions generally view these as providing a foundation for higher level study The document acknowledges that more specific entry requirements can be viewed on UCAS Search.

When discussing the facilitating subjects, the Informed Choices document states:

Many courses at university level build on knowledge which you will gain while still at school. Where this is the case, universities need to make sure that all the students they admit have prepared themselves in the best way to cope with their chosen course. For this reason, some university courses may require you to have studied a specific subject prior to entry, others may not. However, there are some subjects that are required more often than others. These subjects are sometimes referred to as facilitating subjects³

The Informed Choices document does not state that studying a particular subject or subjects will improve an applicant’s chance of gaining a place at a particular institution. It simply states that some courses will require prior knowledge and study to ensure that the learner is fully prepared to progress to higher education. The purpose of the document is to detail the relationship between Level 3 qualification choices and progression to HE and to make applicants aware that the progression pathways available to them may, in part, be determined by their Level 3 qualification choices.

The facilitating subjects do not infer a hierarchy of subject, or state that certain subjects are more desirable for progression to HE. The HE sector is incredibly diverse and an applicant may be accepted onto their chosen course even if they have not studied any of the subjects listed as facilitating. UCAS data shows that 49.5% of UK domiciled 18 year old accepted applicants holding A levels gained a place holding one or none of the facilitating subjects.

In addition, the facilitating subjects list was designed to support progression to Russell Group institutions, and it is inappropriate to assess the performance of an entire learner cohort based on the performance of a subset of students taking A levels in facilitating subjects. In 2013 41% of A level students in England took exams in 2 or more facilitating subjects, therefore the use of two or more facilitating subjects as a performance measure only relates to the minority of the learner cohort.

The qualification regulator, Ofqual, specifies that all A levels are Level 3 and of the same level of demand, therefore it is inappropriate to infer any hierarchy of A level subjects. The inclusion of specified A level subjects within a performance measure exacerbates this misperception.

Q7. Do you agree that we should explore how to report the achievement of students at level 2 and 3 taking work-based training (including Apprenticeships) with independent training providers in performance tables?

³ The Russell Group (2012). Informed Choices. Page 27

UCAS supports the increased reporting of student achievement for those learners who are undertaking work based training (including Apprenticeships) at Level 2 and 3. This will ensure that the progression routes and achievements of these learners have parity with the other forms of achievement detailed within the consultation document.

We hope that our above comments have been of use to the Department for Education and would happily elaborate on any points if required.