Appendix 2: Summary of qualitative responses

1. Introduction

This appendix summarises the consultation findings, taking each recommendation in turn and focusing primarily on the qualitative data collected from the online survey, individual written responses received and workshops conducted. Some headline statistics are included throughout the commentary to highlight differences in opinions expressed by different respondent groups. A full report of all quantitative data from the online survey can be seen in Appendix 1. Analysis of responses has been completed according to the grouped respondent types identified at the beginning of Appendix 1 and these are referred to throughout this document.

2. Recommendation 1: Qualification Information Profiles

The Qualifications Information Review has proposed that UCAS generates Qualification Information Profiles (QIPs) for UK-regulated level 3 qualifications, relevant Scottish level 6 and 7 qualifications, advanced level apprenticeships, Access to HE courses and key European and international qualifications (as identified by higher education institutions (HEIs)) in order to meet the higher education (HE) admission information needs.

2.1. Agreement in principle and impact

88.8% of all respondents to the online survey agreed or strongly agreed with this recommendation in principle, with 5.3% disagreeing or strongly disagreeing. Within groups the proportions of those agreeing or strongly agreeing ranged from 100% (learners and government) to 65.5% for awarding organisations (AOs) and sector skills councils (SSCs). 93.6% of HEIs agreed or strongly agreed with the recommendation in principle.

Themes emerging across most respondent types included:

- a general welcome for the proposal as a positive improvement
- the breadth of coverage of the proposed QIPs was seen as an advantage as was having a standardised central point of access
- comments across respondent types that the usefulness of profiles would be limited by the quality and currency of information that they hold
- concerns about the likelihood of fields relating to the demand of qualifications (see recommendation 3) overshadowing other key information; this was felt likely to be at the expense of vocational qualifications in particular
- in responding to questions about the likely impact of the recommendation, respondents highlighted that understanding more about the range of qualifications that candidates may hold would be likely to enable better-informed offers to be made
- there was also a feeling that a common database may promote shared understanding of qualification characteristics.
HEIs

“QIPs would provide a useful single version of the truth.” (University Alliance member HEI)

In general, HEIs were positive and agreed or strongly agreed (r=102 n=109) with the principle of QIPs and their potential role in meeting a well-recognised information need amongst admissions staff. A particularly positive aspect of the QIPs was seen as a central reference point in a common format. This was contrasted with the current diversity of sources and was felt likely to avoid duplication of effort. This benefit was echoed in responses relating to the likely impact of the recommendation, with efficiency savings highlighted both in terms of staff time and decision-making. The particular benefit of the QIPs database to new staff was noted. The comprehensive range of qualifications to be included was seen as a strength, allowing staff to access information about less familiar qualifications more easily. Links were made to potential improvements in decision-making in relation to candidates holding these types of qualification, as well as to QIPs facilitating comparisons between qualifications. The potential for QIPs to support both increased transparency and consistency in offer-making was highlighted, as was a potentially positive impact on widening participation (WP) agendas. HEIs stressed, however, that the provision of QIPs did not override the primacy of institution-level policy and practice in admissions, nor obviate the need for high quality information, advice and guidance (IAG).

In order for these potential benefits to be realised, HEIs identified the fundamental need for QIPs to be robust and reliable in terms of the quality of information they hold. They also stressed the need for regular updating to ensure information currency and to reflect changes over time. There were a number of calls for more detail in the QIPs, with Russell Group institutions in particular highlighting support for more detailed information on the assessment, grading, grade distribution and size of qualifications; the use of guided learning hours (glh) was noted as particularly problematic currently by several HEIs. A cautionary note was also sounded that the amount of detail should not be such that the user would be overwhelmed. In terms of comprehensiveness of coverage, it was felt that it would be important that historical data was held to ensure that more mature applicants could be properly assessed.

A number of respondents referred to the Tariff, noting the potential for QIPs to provide more useful detail than the current Tariff reports and allowing greater emphasis on the relevance of qualifications. However, others saw QIPs as a useful additional tool, rather than a replacement. There was concern that there may be an emphasis on the ‘demand’ field, which was felt may be costly to vocational qualifications in particular.

In terms of technical function, the possibility of a comparison function within the QIP was well liked. There were references to both student and school/college access to QIPs noting both the potential for QIPs to highlight qualification relevance to students (and possibly centre provision) and their potential for increasing the number of challenges made during the application process.

Additional costs associated with provision of QIPs to HEIs were seen as unwelcome, and HEIs noted that there would be additional costs in terms of supporting any change,

1 Note that Scottish qualifications validated by SQA use notional learning hours (nlh) as their indication of volume.
including the review of internal processes and policies. Concerns were also raised about the costs of moving away from a Tariff-based system, and the need for the continued ability to make flexible offers.

Schools, colleges and advisers (SCAs)

“As a Sixth Form College the QIP might assist in steering students away from a 'points driven', instrumental approach with a tendency to 'collect' qualifications towards a greater understanding of how qualification type and content relate to individual courses of study and to each university’s entry requirements. In addition this may assist in emphasising the importance of acquiring specific skill sets for a particular degree course or HE institution.” (Sixth form college)

“If effective, accurate, sufficiently detailed, and regularly updated, this recommendation would help enable the fair and transparent selection and placement of students at institutions” (Grammar school)

“…it actually slays some of the myths about qualifications. If they have a profile that says this is a breakdown...universities I think, can make much better judgements about the nature of qualifications…” (Awarding organisation)

“There is an evident need for clear information on qualifications that is:

- easily accessible to admissions officers, advisers, students, parents/guardians and provides transparency
- standardised, consistent and uniform in presentation
- enables applicants to identify the suitability of a qualification for a particular HE course
- able to support fair and transparent decision-making by admissions.” (Sixth form college)

There was general consensus that the provision of QIPs would be a positive improvement and that there was value in UCAS bringing all of this information into one central place. The provision of more clarity and a level of comparable information was seen as a benefit to HEIs, learners and advisers by providing better evidence to support admissions decision-making. The proposals were seen as positive in terms of promoting understanding of less familiar qualifications that would support the HE admissions process for learners and their qualifications. This would particularly help where students have mixed portfolios, but may have less impact on institutions offering only A levels. QIPs were felt to be likely to encourage advisers to look in more detail at students’ HE applications, focusing more on “qualifications on their own merit, regardless of Tariff points”. QIPs were noted as particularly helpful in raising awareness of Access to HE, International Baccalaureate (IB), Scottish Highers and the qualifications of international students, perhaps lessening the amount of time SCAs spent explaining different qualifications to HEIs. Another potentially positive aspect of the QIPs was their role in helping to maintain intelligence lost through high admissions staff turnover. There was also a feeling that QIPs may help SCAs advising students on choice of level 3 qualifications.

As well as the potential benefits, there were cautionary notes, particularly around the way in which the information may be used by HEIs. There were concerns that providing detailed information about qualifications and the units within them may lead HEIs to favour...
specific optional modules and/or units, which may not actually be available to all learners. There was also a need to ensure that valid use was made of information (e.g. simple comparisons of grade distributions for different types of qualification, such as A level and vocational qualifications would not be appropriate). Concern was raised about the inclusion of information relating to the assessment of the ‘demand’ of a qualification (see recommendation 3), feeling that this may not fairly represent vocational qualifications, or those focusing on the development of ‘soft skills’.

Respondents stressed that any benefits would only be realised if the information underpinning the QIPs were of consistent high quality and regularly updated to ensure currency. Concerns were raised about the quality of information held about regulated qualifications, with qualification size (specifically guided learning hours - glh) given as an example of a particularly problematic measure.

Learners

“Qualification information profiles can support a positive message about the multiple ways that qualifications can equip the individual for life after school or college, and support students to understand this better, rather than reducing their achievement to a single number.” (National student representative organisation)

There was overwhelming support for QIPs from learners responding to the survey who highlighted the importance of being able to compare qualifications and subjects across AOs. The importance of user (student) friendly presentation of information was stressed. Respondents drew on their own experience, laying particular emphasis on examples of qualifications that they were studying of which HEIs appeared to have little understanding or experience.

AOs and SSCs

“Qualification Information Profiles will allow a greater range of level 3 regulated qualifications to be recognised and accepted as suitable for providing progression into HE programmes of study.” (Awarding organisation)

Although two thirds of respondents to this question (r=19 n=29) agreed or strongly agreed with the proposal relating to QIPs in principle, the qualitative responses and comments about the potential impact were broad-ranging.

In general the QIPs were seen as a step in the right direction with the breadth of qualifications covered being seen as a strength, particularly the inclusion of vocational and other qualifications. There was general support for standardised and improved information about qualifications with respondents recognising this as increasing transparency. A positive impact could be to allow HEIs more easily to understand the strengths of these less familiar qualification types and therefore to make more informed offers. However, it was stressed that this information would not be helpful unless the HEI had a policy to look beyond A levels and actually did engage with the detailed information in the QIPs.

Chief among the concerns raised by AOs/SSC respondents was the potential for the ‘demand’ field to “cast a long shadow” over the other information held within the QIPs by becoming the main focus for HEIs. This was felt to be a particular threat to vocational qualifications. The respondents highlighted this ‘measure’ as being too narrow to properly
recognise the strengths of different types of qualification and highlighted concerns with the proposed methodology (see recommendation 3).

The relationship between the development of QIPs and the Ofqual Register (of regulated qualifications) was raised, with concerns that duplication of effort be avoided by adapting, upgrading and improving the Register to serve as the key source of this information on English, Welsh and Northern Irish qualifications. Any duplication of effort would mean increased work for AOs, which was unnecessary. There was a request that AOs should work alongside UCAS and Ofqual when considering revisions to information held in the Register. Recognising their role in originating this information, AOs highlighted that in order to minimise burden upon them, there should be a demonstrated need for any information that is included, and questions were raised about whether there would be scope for AOs to influence the information held. There was also a call for links to be provided from QIPs to AO websites.

There were a number of technical concerns raised about current information quality; measures of qualification size (specifically the use of glh) were highlighted as particularly problematic and unrepresentative of actual learning time. Information about qualification ‘type’ was also seen as problematic. There was a warning that there is a balance to be struck between requiring standardised information and the possibility of stifling innovation.

As well as concerns about the quality of data held, there were issues raised about the capacity of HEIs to engage in a valid way with aspects of the data provided. The example of assessment and grading was given, where it was felt that HEIs would be unlikely to understand why pass rates for criterion-based qualifications would be likely to be higher when compared to those based on (generally more familiar) compensatory assessment. The value of including this type of information was, consequently, questioned as being unlikely to provide clarity and thought to potentially lead to unfair judgements. There was also a feeling that these changes would be likely to require additional IAG and documentation to support them.

**Government, regulatory and funding bodies**

There was general support for the provision of improved information about qualifications, with comments largely focusing on how best to move forward. Although this group felt that information about the relative demand of qualifications was very important, they did raise concerns that its inclusion may deflect attention from the rest of the information within the profiles.

Uppermost in the responses were concerns about the quality of data that is currently available. It was felt that there needed to be clarity about what information HEIs needed and how it would be used, so that “we can ensure the quality of data is up to the job”. There was recognition that HEIs were a key stakeholder of regulators and that information should be provided about qualifications that met their needs. There was also a call for strategic level engagement with regulators to help ensure the needs of HEIs are better met through qualification regulation.

A government, regulatory and funding body identified that there were systems beyond the regulators own systems, such as the Personal Learning Record that may also be worth considering in terms of alignment to reduce duplication and increase utility of the QIP systems. This includes qualification level information on routes to achievement and rules.
of combination as well as referring to the Learning Aims Reference Application and Next Step course directory.

There was a concern that information needed for the regulation of qualifications may not be the same as information needed by HEIs for admissions purposes. A qualifications regulator identified that the assessment mechanism within a qualification is not relevant in terms of regulation, whereas information on assessment methods and the proportion of external assessment may be important to HEIs.

As with other respondents, this group identified the need to ensure that the information contained within QIPs was regularly updated to ensure currency, but that it was also flexible enough to support differences between jurisdictions whilst allowing for future changes without disadvantaging learners. A useful example here was the recommendation that ‘course duration’ be removed from the profiles, since it implied a ‘normal’ delivery pattern. This was seen as particularly problematic given the increasingly flexible delivery patterns that are seen, especially in Scotland.

Several of those responding in this capacity were also likely to become data partners in the implementation of the qualifications database and raised the issue of resources in this context; although these concerns were recognised as real, there was also a feeling that there could be operational benefits to having an improved source of data on qualifications.

2.2. Fairness, transparency and efficiency

“Whilst clear and consistent information on qualifications is a precondition to ensure transparency and fairness it is far from sufficient in itself. The devil is in the detail. If ‘information’ is used to privilege a particular set of criteria to the benefit of some and disadvantage of others, this can potentially exacerbate inequalities and undermine fairness. For providers who support the progression and social mobility of large numbers of vocational or non-traditional applicants from low participation backgrounds this is of particular concern.” (Sixth form college)

The quotation above is a helpful summary of comments made in relation to the fairness, transparency and efficiency of the proposed QIP database. The potential is recognised for a high quality system to deliver greater understanding about a comprehensive range of qualifications and thus facilitate greater transparency in admissions for learners and more efficiency for HEIs. However, all groups of respondents had reservations about aspects of the proposals.

Learners raised concerns that there may be additional time taken for admissions tutors, learners and advisers to understand a more nuanced set of information although benefits were felt to outweigh these concerns.

All respondent types flagged up the importance of having consistent, relevant information within the fields, both across qualification types and frameworks, for example in relation to volume/size of qualifications to ensure uniformity across qualifications. They also raised the question of whether, by including a field relating to the relative demand of qualifications, there would be an unfair emphasis on this aspect of information. The importance of including other aspects of qualification content, such as independent study, organisational skills required and ability to cope with deadlines were raised as aspects that could be included to give a more balanced, and fairer, view. AOs/SSCs noted that there is a balance to be maintained to ensure the amount of detail allows for quick reference, yet also articulates the distinctiveness of qualifications.
Government, regulatory and funding bodies noted that the way in which HEIs use the QIPs would be a key factor in terms of the fairness and transparency they delivered. HEIs also emphasised that QIPs were not a substitute for individual institution policy or position.

Almost all respondent types identified the need to ensure there was no duplication between QIPs and regulatory system (such as the Ofqual register) requirements, highlighting the need for close partnership working to ensure efficiency. To ensure transparency the need for any information relating to equivalencies to be consistent between QIPs and HEFCE was also emphasised.

2.3. Additional information: personal skills/vocationally-related skills & knowledge

In terms of responses to these categories there were, overall, more respondents agreeing, or strongly agreeing, that information about personal skills and vocationally-related skills and knowledge should be included within each category of respondents than disagreed.

HEIs

In terms of ‘other information’ HEIs identified a variety of information that they considered appropriate to include. HEIs from all mission groups identified more information about assessment as important, with Russell Group and non-aligned institutions citing grade distributions and frequencies as helpful and Million+ institutions and non-aligned institutions requesting information on methods and patterns of assessment, such as coursework/examination balance, the availability of re-sits, and the use of projects. Million+ members identified relevant work experience. 1994 Group members identified core skills (e.g. oral and written communication and numeracy skills), Russell Group members identified, for admission to mathematics in particular, information about Maths Olympiads and other relevant competitions. There was discussion, too, about the possibility of including information about the use of different qualifications in HE entry, although it was recognised that this would need careful handling. There were more general requests for information on optional and mandatory components, including size, and detail on subject content, including links to AO specifications. There was also support for a means of identifying potential overlap between different awards. The inclusion of EU qualifications was also identified as desirable. There was also a call for the inclusion of a field for the HESA QUALENT3 code.

HEIs provided further more detailed explanations on the inclusion of information on personal skills and vocational skills in particular. In terms of personal skills (including core skills) there were statements that these were valued by all institution types, however for some institution types, it was felt important that this information should be captured within QIPs because they would use it to assess against course requirements and it would also help particularly with adult learner entry and be useful for WP. Other HEI types, such as members of the 1994 Group, Russell Group, University Alliance and Million+, highlighted that information about academic demand would be more important in QIPs and that information relating to personal skills would be collected through other means, such as the

\[\text{QUALENT3 reflects the highest qualification on entry held by university applicants, qualifications have a code allocated to them as part of this process which forms part of the return from HEIs to HESA each year.}\]
personal statement. One response suggested that this information was not high priority but might be added later on in QIP development/introduction.

The inclusion of information about vocational skills was more generally welcomed, being seen as useful particularly for identifying course relevance and skills matches for particular courses and saving on time spent researching. Inclusion of vocational skills was seen as leading to a better understanding of non-standard qualifications.

**SCAs and learners**

Additional factors identified by this group of respondents also included more information on assessment, grade distributions, re-sits, and links to AO specifications as well as work experience, where compulsory. Additional factors included practical experimental skills in science, employability and entrepreneurial skills, academic and enrichment schemes, global awareness, writing skills, IELTs (International English Language Testing System), creativity and digital skills. Many of these factors were also referenced by learners. It should be noted that some of these may apply to the candidate, rather than the qualification, and would therefore be beyond the scope of QIPs.

There was also a request to include feedback from users on errors within QIPs and a glossary of terms to support consistent interpretation of information.

Comments offered suggested that some SCAs thought that where possible QIPs should stick to a statement of facts over subjective judgements. Some thought QIPs should highlight skills identified as important in predicting a student's likely success in future studies, such as team-working, self-management and independent research skills. Personal skills and vocationally-related skills and knowledge were thought to be of particular value for students applying for more vocational courses.

Concerns were expressed with regard to how this information could be expressed to a consistent standard.

"Given the subjectivity of defining these skills, there is likely to be a rush for all awarding bodies to show they are developing all these skills. Some awarding bodies may look to redesign their qualifications' specifications to try and highlight these identified skills and some will have greater capacity to do this than others. If no comparison is required, then space to explain the 'wider components' (i.e. non-exam) that make up a programme would be welcome." (SCA representative organisation)

**AOs and SSCs**

Suggestions for additional information about qualifications included: study skills, vocationally-related skills, volunteering, work experience, qualification purpose and assessment regulations. In addition, there was a suggestion that there should be more information about international qualifications. As with HEIs there was a suggestion of including information about the use of different qualifications in HE entry, although it was recognised that this information would be highly sensitive. AOs also suggested that there might be fields including testimonies from employers or from universities.

Many comments acknowledged the importance of recognising vocationally-related skills and knowledge and ensuring that they were visible to HEIs, enabling them to make better-
informed offers. However, there was concern that vocational qualifications may still be
under-supported in relation to more well-known academic qualifications. Concerns were
expressed about the potential for the 'demand' field to dominate and methodological
issues with measuring demand were again highlighted.

“We are concerned that this proposal, effectively, represents replacing the current Tariff
with a new type of ‘tariff’ and one that is less transparent”. (Awarding organisation)

A broader measure of qualification 'demand' was proposed which would better represent
the range of skills and knowledge within qualifications. There was a comment that
personal skills should be recognised through the achievement of recognised qualifications
in this area.

**Government, regulatory and funding bodies**

Information relating to personal and vocational skills, as well as the identification of
individual elements of academic demand, such as the demonstration of research skills,
was important. It would, however, be necessary to be clear about how these skills are
developed and assessed and their weighting in the overall qualification. It was suggested
that the value of skills would be better highlighted by the inclusion of a separate field.
More generally there was a suggestion that there should be profiles produced at
qualification type level, as well as for individual subjects, to provide additional information.
It was also suggested that the owner or provider of data within each field should be made
clear.

**2.4. How might information be collated and presented**

Comments in this section were varied in terms of their focus, whether relating particularly to the
personal skills and vocationally-related skills referred to in the related question, or to the QIP
database more generally.

Comments relating specifically to the personal skills identified the subjective nature of this type
of information which would make consistent reporting difficult; it was also noted that this type of
information would be more relevant to some HE subjects than others. Another suggested that
this information be presented in a table or list with ratings for each qualification; one suggested
that the proportion of qualification time devoted to these aspects might be indicated by flagging
the percentage of glh they were allocated.

More general comments identified a searchable, web-based database as desirable, and graphs
and charts demonstrating the components of a qualification (or aspect of a qualification) were
identified as helpful by HEIs and AOs. AOs suggested a broader ‘demand’ measure with its
component sub-measures displayed in this way. HEIs and schools and colleges stressed the
need for accurate and consistent data to ensure fairness in terms of HE access. AOs underlined
the need for the regulators’ systems to form the source of QIP data (subject to enhancement).
Learners and schools and colleges identified a need to link to AO information.
2.5. Inclusion of profiles for apprenticeships and Access to HE

Of those responding to the survey, the majority of respondents in all categories either agreed or strongly agreed with the inclusion of profiles for Access to HE (r=238 n=304) and apprenticeships (r=208 n=304); this was reflected in the comments received.

There was general support for the inclusion of information about apprenticeship frameworks and Access to HE as part of a comprehensive database; these qualifications accounted for a significant number of candidates in some cases and information to support an increased understanding of these courses was felt to be valuable.

In terms of Access to HE it was felt to be likely that these profiles would be structured differently to other QIPs, reflecting the purpose, cohort, structure and approach to learning and assessment that it typifies. It was noted that separate profiles would be needed for each UK country. The challenge identified, by AOs, HEIs and SCAs, will be to provide profiles that accurately represent Access courses without trying to shoehorn them into a system designed for other purposes, retaining sufficient granularity to render them useful, so that they offer “greater clarification to HEIs on the whole range of level 3 qualifications, while acknowledging their distinctiveness”. (Awarding organisation)

“It is important that sufficient information about Access to HE courses is made available to universities in a consistent, standardised format, so that universities can compare qualifications and give equal consideration to applicants presenting with these, and other, qualifications” (Russell Group member HEI)

SCAs highlighted that both Access courses and apprenticeships were currently commonly misunderstood by admissions staff, partly because of the variability of information they receive. Providing clear information on what is learnt and covered would help enable them to determine whether it was suitable preparation for HE. Learners’ representatives highlighted the importance, in particular for mature students, of including these qualifications because they “form part of the geography of decision-making among students and it is important to be able to assess these alongside other options”.

The importance of consistency across the different AOs was highlighted more generally. Million+ members highlighted the fact that both the apprenticeships and Access to HE frameworks (as well as EU qualifications) are outside the current Tariff as a key weakness.

Speaking from a technical perspective, AOs felt it may be challenging to develop a QIP for Access to HE in particular, and several AO respondents noted that as apprenticeships incorporated other qualifications these would have their own QIPs, and there was a query whether, if these component awards were subject to demand ‘rating’, there would be an impact on the pathways chosen by apprentices.

It was identified that QIPs had implications for the development of the QAA database of Access courses and that further development of QIPs would be needed to provide comprehensive and reliable information for individual or groups of Access courses.

2.6. Provision of further information about other courses/qualifications/tests

In terms of suggestions for the inclusion of other qualifications and courses, there were calls from a number of HEIs and government, regulatory and funding bodies for QIPs to cover
European and selected international qualifications, including some common international level 2 qualifications. A smaller number of HEI respondents would also favour:

- English language test/exams
- Language qualifications – e.g. DELF, ASSET, IELTS, TOEFL
- Additional tests for mathematics like STEP and AEA
- OU credits/qualifications.

Both AOs and a government, regulatory and funding body highlighted the desirability of including level 4 qualifications where these provided common routes of progression to HE (for example HND, DipHE and some vocational qualifications).

Patterns of agreement in relation to these questions were variable, although the majority of respondents in all categories agreed or strongly agreed with the proposal relating to the inclusion of level 2 (SCQF level 5) qualifications ($r=193$ $n=304$). This was not the case in relation to admissions tests where fewer than 50% of HEIs ($r=41$ $n=109$) and AO ($r=7$ $n=29$) respondents agreed or strongly agreed.

**Level 2 (SCQF level 5) qualifications**

For HEIs, the value of level 2 qualification information was chiefly limited to the core subjects of English, mathematics and science (provided it could be done for minimal cost); concerns were raised about the academic rigour of 'equivalent' qualifications and it was unclear how acceptable 'equivalent' qualifications would be agreed. SCA and AO respondents also identified English and mathematics as the key level 2 qualifications that would be likely to be important, since they were often required for entry to HE; both these groups also identified the importance of including 'equivalents' or 'alternatives' for these qualifications and this was seen as of particular use in promoting understanding of equivalent Scottish qualifications. AO respondents also identified other level 2 qualifications that were ‘relevant’ to HE requirements, or prerequisite to attainment at higher levels (in the case of vocational qualifications), and those that form part of the Access to HE Diploma as important to include for HE decision-making.

On a dissenting note, SCAs, learner and AO respondents identified a potential problem of including level 2 (SCQF level 5) qualifications as raising the likelihood of their being used more widely to inform decisions for HE which was felt to be inappropriate by some, and to potentially disadvantage students from widening participation backgrounds by others. The government, regulatory and funding bodies who responded also felt that this would have additional resource implications.

Several HEI respondents identified that concerns about increasing capitation fees meant that they would prefer to focus on widening the range of level 3 qualifications, rather than including level 2. They also indicated, were they to be asked to prioritise, that they would favour new over legacy qualifications for inclusion, and international over vocational qualifications. Learner representatives also raised concerns that the inclusion of level 2 may make the database very large. There were also suggestions that an immediate focus on comprehensive coverage of level 3 would help, and then phased introduction of other categories/levels could be added later.
Admissions tests

SCA and AO respondents identified information on admissions tests, which helped HEIs discriminate among the most able students, as important for HEIs to understand and as a means of increasing transparency for learners.

2.7. Timings for the launch of QIPs

A September 2013 launch of the QIPs was preferred by 50.3% of all respondents \((r=153, n=304)\) whereas only 21.4% favoured January 2014 \((r=65, n=304)\).

For the majority of those responding with qualitative comments from HEIs, SCAs, government, regulatory and funding bodies and learners in the preference of a September 2013 launch came both because a September date was a better fit with the admissions cycle, and because there was a general feeling of ‘the sooner the better’. It should be noted that some SCAs did not feel that the admissions cycle allows sufficient time for informed choices to be made about level 3 qualifications in the light of entry requirements that will apply two years later.

For AOs who expressed a preference, there was a similar preference expressed for an early launch to allow HEIs additional information as quickly as possible and suggestions from some AO respondents that, were the pre-existing regulator systems a potential key source for the QIPs, there was no need for major delay beyond that required for some enhancement of the existing database, with a suggestion that there could be phased enhancement over time.

For other respondents there was a concern that it would be better to exercise caution. The main issue raised by HEIs and AOs was that it was more important to get this right, rather than rush changes. The message of AO comments advocating delay was the need for thorough design and development phases to go ahead to ensure that the product was robust, and that this should dictate the timeline. The challenging nature of developing and carrying out demand rating was identified as particularly problematic.

There was a general feeling among those HEIs who felt January 2014 was appropriate that this would give more time to prepare, allowing for review and updating of marketing materials, as well as a longer period for the development of the system. Some SCAs also identified the need for a longer run-in time between launch and use within admissions cycles to allow for time for communication to different stakeholders and training for relevant staff.

There were concerns voiced, particularly by SCAs and AOs, that this was a time of major change in terms of qualifications, particularly the changes to A levels, the introduction of Curriculum For Excellence and the introduction of higher fees and FE loans system, and therefore timescales should be adjusted to take account of, and align with, this.

Several comments from SCAs and AOs focused on the issue of the transition between the existing and new systems, the need to properly evaluate the new system and its impact on admissions behaviour, before moving fully over. Transition arrangements should not disadvantage students, and AOs highlighted the need to avoid the ‘limbo’ of a suspended Tariff prior to the introduction of QIPs which was felt would disadvantage qualifications not already on the Tariff.
A government, funding and regulatory body identified the need for clarity about the qualifications that would be covered by the QIPs as soon as possible to enable future date requirements to be planned.

2.8. Transition arrangements

All respondent types highlighted the need for high quality and timely communications to ensure that any changes to the system and new methodologies were properly understood by all relevant stakeholders and did not disadvantage learners. SCA respondents felt that there should be clear information about the data fields on the QIP to ensure their proper interpretation by learners and HEIs, which should clarify how the data may legitimately differ for a range of qualifications.

In terms of necessary actions following the publication of QIPs, HEIs identified a need for them to assess the information and formulate policy in response to this, with clear information being given to candidates about what use institutions would be making of the information. Any proposed changes should be published in sufficient time to allow applicants time to research and make appropriate choices.

SCAs stressed the need for student applications to be assessed fairly during any transition period, with HEIs clarifying any transition arrangements that are put in place. Government, regulatory and funding body respondents were equally concerned with the potential for students to be disadvantaged and emphasised that learners should retain access to the same type of information as at present without interruption.

AOs highlighted the need for the Tariff to continue to operate in the interim period (i.e. end current suspension) to ensure equity for qualifications that are not currently within the Tariff. They also stressed that when the QIPs are introduced the system should be complete and comprehensive, including legacy qualifications to ensure candidates are not disadvantaged by holding qualifications outside of the QIP range. Were QIPs for legacy qualifications not to be possible either Tariff or other information should be provided to ensure fairness. Several respondents raised the possibility of AO checks for accuracy of QIPs prior to publication. SCAs identified the need for a central point for reporting and resolving QIP issues/inaccuracies so these could be quickly addressed.

2.9. Communications and guidance

All respondent types highlighted the need for a comprehensive and large-scale communication strategy to ensure that all those affected (school and college advisers, applicants, HE staff, AOs etc.) understand how to make the best use of QIPs. Learner responses identified the need for information to be available as early as possible to help with making choices at level 3.

Training was stressed as vital for all those engaging with the new system, and a variety of methods were suggested, including a toolkit for admissions staff and advisers in schools and colleges, easily accessible online information, and regional training events. UCAS was recommended by SCAs to use a range of channels to communicate any changes with future applicants and their parents, since some students do not get guidance through schools and colleges. HEIs felt that web-based information should be accessible from a single UCAS portal which is easy to find, linked to UCAS Apply, Course Search and Entry Profiles. SCAs also identified the need for QIP information to be easily accessible, highlighting that Tariff tables are slightly tucked away on the UCAS website.
AO respondents focused on the need to ensure that legitimate use was made of the information provided in data fields. This needed to be clearly explained to minimise the risk of misinterpretation by students or HEIs, and detailed information should be backed up by extensive communications/training programmes to ensure stakeholders were thoroughly aware of how to work with the new system; trialing/piloting with the admissions process was suggested as necessary. SCA respondents also identified the need for a feedback and evaluation process to be in place for all stakeholders.

Several AO respondents reiterated comments stressing the importance of ensuring that any system developed allowed for fair and equal representation of vocational qualifications; comments referenced the proposed ‘demand’ classifications, and stressed the importance of AOs and Access Validating Agencies (AVAs) being involved in the process. There were also requests for further clarification and discussion before further progress is made in development.

2.10. Further comments

Comments that were not covered elsewhere within the questions relating to this recommendation related to the costs both to HEIs and to AOs.

There was also a comment from an AO respondent that perhaps the option of simply broadening the existing Tariff system to include more qualifications had not been adequately considered. A final AO comment was a need to ensure adequate lead times to allow for planning to run down stocks of printed materials etc.

A number of HEIs complained about the extent of overlap in content of diplomas due to the optional content and some also expressed concerns about the variability in number of mandatory/optional modules depending on the centre.

3. Recommendation 2: A move towards grade-based entry requirements

The Qualifications Information Review recommends that HEIs consider the gradual withdrawal of the use of the UCAS Tariff for setting entry requirements and for offer-making, coupled with the promotion of the greater use of qualifications and grades for setting entry requirements and for making admissions offers and decisions. This would need to be accompanied by an extensive communication programme to support applicants and advisers. UCAS would commit to maintaining the existing Tariff for an agreed period of time, but would not evaluate new qualifications for inclusion after an agreed deadline.

63.5% of all respondents to the online survey agreed or strongly agreed with this recommendation in principle, with 16.1% disagreeing or strongly disagreeing. Within each of the respondent groups of learners, SCAs and Government, regulatory and funding bodies around two-thirds agreed or strongly agreed. AOs/SSCs were least likely (37.9%) to agree or strongly agree. 69.7% of HEIs agreed or strongly agreed with the recommendation in principle.
3.1. Agreement in principle and impact

The majority of stakeholders responding online agreed or strongly agreed with this recommendation in principle (r=193 n=304). Despite this there were a number of concerns that were raised by all stakeholder groups. Themes emerging across all respondent types included:

- positive feedback regarding consistent and clear entry requirements and the highlighting of qualification relevance
- concerns about the loss of flexibility in setting entry requirements and making offers
- the potential impact on resource and costs for HEIs who use the Tariff
- concern about the possible impact on school and college curriculum
- concern about the impact on WP and non-traditional learners.

HEIs

For HEIs that agreed or strongly agreed in principle to this proposal (r=76, n=109) the majority already made grade- and qualification-based offers, or were moving towards them. As such the recommendation did not represent any significant change in terms of practice.

Comments in support of this recommendation from all stakeholders highlighted the increased clarity that grade- and qualification-based entry requirements would have for learners and the increased promotion of the importance of qualification relevance that it would lead to. It was also felt to be a useful way to assist HEIs in terms of managing their numbers more effectively. The lack of Tariff use currently within Scotland was highlighted in particular as a positive reason to move away from Tariff offers.

“...some people tend to hide behind the UCAS Tariff points, and if it hasn’t got points then they don’t get in. Part of the reason I’d be interested in moving away from it is because it would make people genuinely look at what the broader range of applicants are coming with...” (Non-aligned HEI)

However, for HEIs who currently use the Tariff for setting entry requirements and offer-making the recommendation was generally not welcomed. Despite an acceptance of the increased transparency that would be associated with grade- and qualification-based entry requirements and offers, there were concerns raised about the possible loss of flexibility in offer-making and the impact that this could have on WP, non-traditional and mixed profile learners whose qualifications may not be explicitly included in any qualification entry requirement list. HEIs value the flexibility that the Tariff gives them and the range of qualifications that are included within these entry requirements/offers.

Concerns were also raised about the amount of additional work that would be involved in any move away from the Tariff, such as the updating of offer libraries and training for all staff involved in admissions. It was generally accepted that the Tariff is not a perfect tool, and HEIs are well aware of the problems with it. A small number of respondents expressed the desire to update and improve the Tariff rather than withdraw the use of it. Other comments noted that the Tariff is not comprehensive, with Access to HE an example of a qualification that is currently frequently encountered but not within the Tariff.
SCAs

Respondents representing schools, colleges and advisers were generally supportive (r=83, n=128 strongly agreed or agreed in principle) of this recommendation, expressing the belief that clearer, more consistent entry requirements would be beneficial and act as a motivating factor which would enable better advice and guidance to be given to learners, outlining that learners usually found grade-based offers easier to understand. These thoughts were echoed by workshop attendees. The current situation where students would encounter both Tariff- and grade-based offers was confusing; moving to a single transparent system was felt to be helpful.

However, concern was expressed about the loss of flexibility in the system if Tariff points were to be withdrawn and that this would have a particular impact on those learners who used Tariff points to ‘boost’ their total points by taking additional qualifications.

The need for flexible entry requirements was felt to be important, and that if the Tariff was withdrawn, all possible combinations of grades would need to be outlined. Concern was expressed about the de-motivating effect that could be had on learners if their qualification were not specifically listed in those that were or were not accepted. It was also noted that the current Tariff is not comprehensive in its coverage, and so it may make the promotion of non-Tariffed qualifications easier.

AOs and SSCs

Respondents representing AOs and SSCs were less supportive of this proposal, with 11 of 29 agreeing or strongly agreeing in principle. AOs offering more traditional academic qualifications were aware of the direction of travel toward grade-based offers; however some comments still highlighted a potential loss of flexibility.

For AOs offering vocational qualifications, in particular, there was concern that a move to ‘grade-based’ implied a requirement for graded qualifications, which was not always a feature of VQs; this was felt to imply a lack of understanding of competence-based qualifications, where candidates need to achieve 100% of criteria to pass. Other AOs highlighted the lack of coverage of the current Tariff and felt that a move away from the Tariff to more comprehensive awareness of qualifications by HEIs would be a positive move, some flagging up their ability to better promote their non-Tariffed qualifications.

Learners

Learners who responded online (r=16, n=25 strongly agreed or agreed in principle), and those who attended the consultation workshops, were supportive of a system of more consistent entry requirements. It was felt crucial that HEIs would need to be clear about what qualifications they do and don’t accept, and that sometimes the way in which the Tariff was used didn’t make this clear.

As with both HEIs and schools, colleges and advisers, concerns were raised by learners in the workshops about the loss of flexibility in terms of being able to make up a total point score from a range of different qualifications. The concern regarding the impact on learners taking non-traditional qualifications was also raised by government, regulatory and funding bodies, who saw the benefit of more clear and consistent entry requirements but tempered this with concerns about the negative impacts it may have.
3.2. **Supporting fairness, transparency and efficiency in HE admissions**

It was generally agreed across all stakeholder groups that this recommendation would lead to clearer, more transparent entry requirements and offers that would be easier to understand. This was felt to help reinforce the importance of qualification relevance and learners felt that having offers based on their own specific qualifications would be fairer.

Concerns were repeatedly expressed about the loss of flexibility and as such the impact this would have on the fairness of the system. AOs expressed specific concerns about the possible impact on ungraded qualifications which they did not think would lead to a fairer system. Several responses queried whether the impact of the ‘demand’ field within QIPs would be likely to distort perceptions of qualifications, devaluing certain types of qualifications in particular.

In terms of whether the recommendation supported efficiencies responses were more negative and less convinced. Primary concerns regarded the workload implications of changing the system and the difficulty of trying to formulate flexible offers, where alternative combinations of grades or qualification types may be appropriate, when compared with using the Tariff. The change from Tariff-based offer-making was considered to be resource-intensive.

3.3. **Timing of the withdrawal of the use of UCAS Tariff points**

If it were to be withdrawn, it was felt that the withdrawal of the use of Tariff points would have to ensure sufficient time to allow for QIPs to inform any updating of entry requirements. HEIs across all mission groups outlined the need to be mindful of the impact on those institutions that used the Tariff. Schools and colleges flagged up that timing needed to be managed so that learners were able to use the qualifications that they had selected at level 3 and not be disadvantaged by any change.

There was some concern expressed about the confusion that may arise from the transition period and the running of dual systems.

3.4. **Transition phase**

It was generally felt that the Tariff should be maintained for a maximum of two cycles/academic years following the introduction of QIPs with the need to reduce the scope for confusion but ensure understanding of the new system being key.

It was noted that any transition would also have to support the provision of data about qualifications and achievement of them.

3.5. **Inclusion of new qualifications in the Tariff**

There was little consistency of view when asked about when qualifications should cease to be evaluated for inclusion in the Tariff; views ranged across stakeholder groups from immediate effect (if there were no value and the Tariff were ultimately going to be removed) to once the QIPs have been introduced and are operational.
3.6. Support during transition phase

HEIs listed considerable areas where they felt that they would require support during the transition phase. This support included the below areas and was echoed in the responses from other groups:

- training and planning support for new coding structures/offer banks
- software training and liaising with suppliers
- support and guidance for learners/applicants
- briefing events and training to support the different groups affected (students, advisers, HEI admissions staff etc.).

3.7. Communications and guidance

Comments were closely linked to those made in response to the question about support needed in the transition phase. Detailed and timely communication and guidance was felt to be central to the success of and easy transition to any new system.

If the system were to change it would be vital to ensure that all learners had access to appropriate advice and guidance about these changes: there would need to be targeted communications and training for advisers and those who support learners in schools and colleges and for HEI admissions staff.

HEI respondents also called for a clear and simple mechanism to upload entry requirements to support any move away from the use of Tariff points.

4. Recommendation 3: A means of comparing 'demand' across qualifications

The Qualifications Information Review recommends the development of a rigorous means of comparing academic demand/difficulty across different qualifications, underpinned by independent criteria and validated by HE, to support HE admissions.

4.1. Agreement in principle and impact

63.5% of all respondents to the online survey agreed or strongly agreed with this recommendation in principle, with 13.5% disagreeing or strongly disagreeing. Within groups the proportions of those agreeing or strongly agreeing ranged from 72.0% (learners) to 31.0% (AOs/SSCs). Around two thirds of SCAs and government, regulatory and funding bodies agreed or strongly agreed. 70.6% of HEIs agreed or strongly agreed with the recommendation in principle.

Many stakeholders agreed that it would be helpful to have better information about how well level 3 qualifications prepare students for the academic challenge of higher education. However many also expressed concerns about whether this could be accurately measured and concerns were expressed about how it would be used within admissions. There were a number of significant issues that would need to be resolved before a new measure of demand recommendation would be agreed in practice. These included:
- concerns that a narrow focus on academic demand was unlikely to meet the broad needs of a divergent HE sector and would be likely to disadvantage those with vocational qualifications
- concerns that information on academic demand or difficulty should be seen as part of a measure that recognises the value of a wider set of skills
- concerns that any numerical measure of demand would be seen as another Tariff and may encourage a mechanistic approach to admissions
- concerns regarding the use of CRAS methodology
- the subjective nature of demand and the likely difficulty of getting agreement across HE on demand criteria and judgements
- the concern that demand differs within qualification families which presents problems for those involved in HE admissions who rely on standards being consistent in order to make offers that are fair and transparent
- the need to involve a broad range of stakeholders in establishing demand measures, including qualifications regulators, AOs and representatives for schools and colleges as well as representatives from the breadth of HEIs
- communications need to emphasise that HEIs will make own decisions on what offers to make. Demand measures would be for general guidance purposes only: offers may vary depending on qualification relevance as well as contextual information
- concerns that qualification choice at level 3 may become restricted as schools and colleges offer those qualifications that are valued more highly for HE progression than others.

HEIs

Despite high levels of overall agreement \((r=77, n=109 \text{ strongly agreed or agreed})\), concerns were raised by HEIs regarding the ability of the sector to reach agreement on the definitions of demand given the breadth of HE, on the process of how these ratings would be agreed and on the individual demand ratings. It was also noted that a measure of demand would not reflect the progression value and relevance of a qualification in relation to a particular HE course.

Concern was also expressed about the negative impact a single academic demand measure would have on the perceived value of vocational qualifications and as such many HEIs favoured the use of a more broad-based measure of demand which would recognise the progression value of qualifications with more vocational elements and provide important balance to academic measure.

Some HEIs suggested that UCAS should focus on improving the Tariff rather than replacing it.

A number commented that a demand rating would be welcome as it would recognise the additional demand placed on students by the IB in comparison to A levels.

SCAs

Despite the majority of SCAs agreeing or strongly agreeing \((r=82, n=128)\) in principle with this proposal, a number of reservations were expressed regarding the subjective nature of demand and the impact that this may have on more vocationally-based qualifications and the progression of different learners into HE. Given the wide range of HE courses which
value different skills, some SCAs commented that they thought it unlikely that a single measure of academic demand would meet this range of needs.

“We are looking at a wide range of qualifications that are designed to develop specific combinations of skills within specific progression paths and learning contexts. This cannot be reduced to one measure.” (Sixth form college).

“Different HEIs will value different things. Some HEIs just want specialism and ‘demand’; others prefer greater breadth of course content” (SCA representative organisation)

Some were concerned that demand measures may encourage more young people to opt for ‘highly valued’ academic qualifications when they may have been better suited to a more applied course. However, some thought a demand score would provide an appropriate way of showing the added demand that different qualifications place on students. Another impact may be that AOs strengthen the academic content of all level 3 qualifications, which may restrict learner choice. A positive outcome may be that a demand rating (as part of a QIP) would enable schools to provide better advice to young people on the opportunities for progression associated with level 3 qualifications.

AOs and SSCs

There was a strong sense among AOs that a focus on academic demand in isolation would not be appropriate. Whilst some recognised that many HEIs would value this information, others were more concerned about the negative impact the measure may have on some groups of learners. Providing information on academic demand as part of a broader measure of demand was seen as a more suitable way forward.

“A measure of academic demand is fundamentally unfair and presents significant risks to the equality of opportunity for learners who have not progressed via a purely academic route” (Awarding organisation)

A number of respondents highlighted concerns that demand ratings at a qualification type level were inappropriate given the variability of demand within qualification families. A focus on a single demand measure was also likely to result in a simplistic arrangement similar to the current Tariff.

Concerns were raised about the demand construct and how the characteristics of the learner population interact with this. Some noted that CRAS methodology was originally intended to evaluate the demand of individual assessment items rather than whole qualifications. Any measure of demand would not allow for the value of qualification relevance.

4.2. Supporting fairness, transparency and efficiency in HE admissions

The majority of HEIs expressed concerns over fairness of an academic demand measure in relation to vocational qualifications and WP learners and questioned the efficiency benefits if they were going to have to change and update their systems as a result.

AOs expressed particular concern with the proposals. There was felt to be unfairness and lack of transparency inherent in the proposals, based on the lack of breadth of the proposed
construct of academic demand. This was viewed as providing only a partial representation of the strengths of qualifications, and therefore both unfair and lacking in transparency.

Government, regulatory and funding bodies expressed the need for a “fair, equitable and transparent assessment of all qualification types” and were unsure as to whether the demand rating would achieve this. SCAs commented that more information would be needed on the measures to be used before the fairness, transparency and efficiency of the proposals could be properly assessed. Like other groups SCAs were generally concerned about the impact on learners with vocational qualifications and how this would impact on their chances of progressing to higher education.

4.3. Comments on academic demand criteria

**HEIs**

General concern was raised with regards to the danger of a relatively narrow definition and measure of demand and the impact an academic demand rating may have on qualifications with a more vocational basis.

A number of HEIs (notably members of Russell Group and 1994 Group) highlighted the need for a measure that would reflect the differences they perceived in the demand of different subjects within the same qualification family. Whilst many HEIs thought CRAS criteria represented an appropriate starting point for the development of demand measures, others suggested that these would not be adequate for the task.

**SCAs**

The issue of demand within qualification type was also raised by schools, colleges and advisers, who highlighted concerns that all qualifications within a family do not necessarily have the same demand.

Concerns were also raised with regards to the CRAS criteria and the robustness of this as a methodology.

A focus on academic demand was felt to have the potential for a negative impact on take up and perceived value of vocational qualifications and that consideration must be given to the fact that learners’ choices are restricted by the options that are available to them through their school/college.

**AOs and SSCs**

Whilst some AOs recognised that HEIs would value better information about the academic demand represented by qualifications, others were concerned that a demand scale may lead HEIs to focus just on this and not on the wider detailed information included in QIPs. The majority of comments expressed concerns about the criteria and methodology proposed; the subjectivity of the CRAS approach was highlighted as problematic, as well as the perception that it does not consider fitness for purpose in relation to non-traditional qualifications. The narrow range of the criteria covered by CRAS was highlighted, and detailed alternative proposals were provided in one instance. This proposal was similar to the “Manhattan skyline” approach previously considered by the UCAS Tariff Advisory Group in which qualification demand is profiled across a number of dimensions.
Government, regulatory and funding bodies

There was support for a centrally-devised measure but it was felt that the application of the CRAS criteria for academic demand would not be appropriate for all types of qualification, particularly those with a skills-based approach to learning, and that this could have a negative impact upon the diversity of the qualifications market.

Consideration of additional skills, such as communication, reasoning and planning, was suggested. Providing better information about how different level 3 qualifications compare with each other was seen as a job for the qualifications regulator rather than UCAS.

Specific comments were made by Scottish respondents with regard to ensuring the system is appropriate for Scottish qualifications and alignment to the SCQF.

4.4. Role of the qualification advisory group

Respondents from each stakeholder group were broadly supportive of the proposed qualification advisory group, but its role was seen to be extremely challenging.

It was felt essential that the group should be representative of the breadth of HE institution types and subjects and that establishing this membership would be difficult. AOs suggested that the inclusion of representatives from the Federation of Awarding Bodies (FAB) and the Joint Council for Qualifications (JCQ) might be beneficial and it was also suggested that there should be some representation from the FE sector and from the regulators and that the group would need to be fully representative of all UK countries.

“This group may be hard to pull together and even harder to come up with a consensus on demand level of qualifications” (Million+ member HEI)

Some respondents raised concerns with the sustainability and costs of running such a group.

AOs expressed a desire to have a greater involvement in the qualification advisory group, suggesting that:

“the assessment of any ratings could be carried out by the awarding bodies with input from HE stakeholders… They could then be verified by the UCAS Qualifications Advisory Group” (Awarding organisation)

4.5. Communications and guidance

The need for clear and consistent communications was echoed by all respondent types. Communications would be needed about:

- what qualification demand means and how it will be used within admissions i.e. to inform their entry requirements and offers
- information on how qualifications have been demand-rated and the extent of HE engagement in this process
- how this differs from the Tariff
- the need for new IAG for learners on what the rating would represent
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- information on how an AO may appeal a rating
- early advice to SCAs to minimise any disadvantage to learners
- information on the timing, costs and processes.

4.6. Further comments

Comments received about this recommendation from HEIs highlighted the concern they had regarding the difficulty of getting a consensus of opinion across the sector with regards to demand.

Comments were received which outlined thoughts that:

- ideally any measure should recognise that not all A levels are to the same standard
- separate ratings of individual qualifications within composite awards would be welcomed
- HEIs are likely to look at relevance of qualifications based on their own experience, course and the local market as opposed to just the ‘academic’ demand
- all vocational qualifications would need to be included
- concerns about the devaluing of vocational and employment-related skills.

AOs commented on the need for an appeals process to challenge “inappropriate” demand rating decisions and the need to ensure that the same qualification offered by different AOs achieves the same rating. Information on the principles and processes governing the demand rating process should be made available early on to enable qualification redevelopment; clarification was also needed regarding the position in relation to component qualifications.

5. Recommendation 4: A metric for management information

The Qualifications Information Review recommends the development of simple qualifications metric for management information, planning and reporting.

5.1. Agreement in principle

“The metric appears to be a good idea. There could be concern that this… is making the admissions process mechanistic, with little room for the importance of contextual data that is important in applications typically from non-standard applicants…” (Russell Group member HEI)

“I question the benefit of "comparing apples and bananas" but if we must do so, let us at least ensure that we do measure skills demand as well as academic demand.” (Non-aligned HEI)

This section was targeted at those working in higher education. Support for a metric for management information purposes was partly contingent upon the way in which recommendation 3 (means of comparing demand) would be implemented. Key themes included:

- the need for more broad-based measures of qualification demand
- the impact the devaluing of vocational qualifications would have on HEIs’ league table positions, widening participation and student recruitment and learner behaviour
The need for comprehensive coverage of qualifications within management information measures in order to support a universal metric is supported by a desire for consistency across HEFCE AAB qualification equivalencies and any new UCAS measures. The likelihood that measures developed for management information would be used for other purposes is also highlighted as a potential outcome of A level reforms on perceptions of demand.

The majority of HE respondents agreed in principle (r=69, n=109 agreed or strongly agreed) with the creation of a simple qualifications metric for management information purposes. Feedback suggested that most saw management information measures as either essential or unavoidable and hence wanted these measures to be robust and comprehensive.

However, less than a third of HEIs (r=31, n=109) agreed that such a qualifications metric should be based on measures of academic demand and qualification size alone. Many saw a focus on academic demand as leading to a reductive and narrow measure that would not reflect the progression value of vocational qualifications in relation to certain HE courses and hence would disadvantage those HEIs that recruited more applicants with vocational qualifications in terms of management information measures.

Agreement of a more broad-based definition of qualification demand would be necessary before a new metric could be developed. Some also suggested that guided learning hours were seen as providing an unreliable measure of learning volume and should also be addressed prior to the development of new measures.

Many respondents noted that qualifications metrics developed for management information purposes would inevitably be used for other purposes including HE admissions, graduate recruitment, league tables and other reporting, just as the Tariff had been. Whilst some HEIs were happy to seek assurances that UCAS would work to limit the inappropriate use of its measures, others recognised that UCAS would not be able to control its use once made public. Some doubted whether it was worth developing a new metric as it would still be used and abused in the same way as the Tariff.

Some questioned whether the timing was right to introduce a new management information measure given the turbulent strategic environment, in particular changes to A levels and student number controls. The costs of developing a demand scale at this stage may not justify the benefits that it may deliver to some HEIs and the risks it represents to others, particularly if it all needs to be revised again within a few years; it may be better to stick with Tariff as a management information tool until things settle down. Some HEIs argued that the Tariff was already “adequate” for management information purposes and should be extended to cover all qualifications rather than be replaced.

However, feedback suggested that HEIs would welcome a more comprehensive coverage of qualifications within management information metrics (than currently provided by the Tariff) as this would simplify reporting for HEIs. Similarly, a number of respondents were keen that UCAS should work with HESA and HEFCE to ensure that the development of qualification equivalencies arrangements (whether based on the Tariff or new measures of demand) are consistent with AAB/ABB number controls and allow for the easy identification of these.
Some HEIs welcomed a ‘cap’ on the size/number of qualifications that count towards the metric, arguing that a maximum score for the metric (or a fixed size to the metric) would enable better comparison across HEIs. Some would value the inclusion of level 4 qualifications within management information measures.

Overall, a strong message from the sector was that any measures arising from the implementation of the new system should have a neutral impact on performance measures (this would seem to imply that they should be broadly in line with existing Tariff equivalencies). Some comments received from schools, colleges and advisers suggested that management information measures should focus on those qualifications that feature within HE offers rather than the student’s total ‘qualifications pot’ as many of these would not be relevant to the course in question.

Comments from regulatory and funding agencies commented on the need for a metric that was not driven by uncapped measures of the volume of learning.

5.2. Impact on organisations

“The proposed methodology (weighting of academic demand and size) could have a detrimental impact on our league table position.” (University Alliance member HEI)

The measures were seen as having a relatively low impact on highly selective HEIs apart from during the transition phase; it would be unlikely to impact on their elite position within league tables. However this was a significant concern for some recruiting HEIs, who questioned the measures of demand upon which the new metric would be based; if this were based on measures of academic demand then their league table positions may be affected. This might in turn impact on future student recruitment and the viability of courses which have traditionally recruited more students with vocational qualifications.

Some asked whether HEIs would access the metric via HESA/HEFCE or UCAS, or create and report on the metric for (and from) their own internal data. As some HEIs currently only store data on qualification type and grade within their student information systems, ‘Tariff points’ in their HESA returns are derived from an algorithm by HESA. HEIs would welcome new metrics being calculated in a similar way as this would lead to a minimal additional burden on HEIs.

The extent to which metrics were integrated with AAB measures would determine the extent of impact on HEIs.

Some noted that the shift from using the Tariff to the new metric would present obvious problems in terms of time series data. There were mixed views regarding the suggestion that any metric runs in parallel to the existing UCAS Tariff; some thought this would help assess the impact of any change whilst others thought this would cause confusion.

A user of the Tariff for statistical analysis identified a significant amount of re-work to existing specifications, systems and outputs in order to accommodate a new metric. An agency that reports on HE also expressed concern about the continuity and reliability of statistical analysis during the transition period and highlighted the need to retain the Tariff until a new metric is fully in place and has been demonstrated to provide the robust analysis required of it. A government, regulatory and funding body asserted that the creation of a new metric is “not key” to its operations, though it would be welcomed.
5.3. Fairness, transparency and efficiency

“This recommendation has the potential to support fairness, transparency and efficiency but a lot rests on the methodology developed to underpin the qualifications metric” (1994 Group member HEI)

Overall there was some uncertainty regarding the likely impact a management metric would have on fairness, transparency and efficiency as this would depend on the measures (of qualification demand and size) that underpin it. UCAS is unlikely to be able to stop people using measures for other purposes and these may also impact on fairness.

Some felt that a metric used for management information purposes should also be usable within admissions to avoid an unhelpful disconnect between admissions practice and management information. Some believe that developing and improving the existing Tariff mechanism would be the more efficient option than developing a new management information metric.

SCAs

Some respondents from schools, colleges and advisory services addressed questions in this section. Most comments focused on the risk of devaluing vocational qualifications within HE admissions and the likelihood that admissions staff would use the new qualification metric for admissions purposes rather than consider the information within the qualification profiles.

In focus group discussions, schools, colleges and advisory services expected that management information measures would be used within admissions and were concerned that replacing one set of Tariff scores with another would cause confusion. However, others saw merit in a profile of qualification measures showing how qualifications prepare learners for HE in different ways although a total score may be necessary for management information purposes.

Government, regulatory and funding bodies

Written responses from government, regulatory and funding bodies highlighted the need to take account of changes taking place in the education sector and of differences between education policy in the four countries of the UK. Support for a metric to support management information was partly contingent upon the way in which recommendation 3 (means of comparing demand) would be implemented as this would affect the range and type of qualifications that a metric could be applied to.

In focus group discussions it was observed that the UCAS Tariff is flawed for MI purposes as there is no way to cap the volume so this drives it, although this doesn’t reflect the HE admissions reality where “demand” is at least, if not more, important than size. Ideally what is needed is a single measure that applies across a family of qualifications and incorporates volume, academic demand and possibly ‘other valued features’ and generates a qualification type score. Some observed that it was better for UCAS to continue to develop these measures otherwise other organisations will generate their own scores.
5.4. Communications and guidance

In addition to the need for UCAS to start communicating changes as soon as possible it was felt that detailed technical guidance with respect to how any new metric would work and how it ought to be used would be essential. If both metrics (UCAS Tariff and the new scores) are to run in parallel during a transition period, UCAS will need to involve the software suppliers to ensure that recording of both measures is supported.

6. Recommendation 5: An annual report on the use of qualifications in HE admissions

The Qualifications Information Review recommends the provision of a UCAS annual report on the use of qualifications within HE admissions.

6.1. Agreement in principle

76.2% of HEIs agreed or strongly agreed in principle (r=83 n=109) to this recommendation. Due to the limited information provided many respondents of other types chose not to respond to this recommendation. Those that did respond however were largely supportive, recognising that increased and improved data about the use of qualifications in HE admissions is potentially a useful and valuable resource.

Although 48.9% of AOs (r=14 n=29) did agree in principle with an annual report, they were also the respondent group most ambivalent about this recommendation (27.6% neither agree nor disagree r=8 n=29) and cautioned, as did many HEIs, that UCAS should be mindful of its influence on the sector. The need for careful consideration of how any data is presented in such a report and how data could be interpreted by different audiences and/or manipulated for different purposes was emphasised.

“UCAS needs to recognise that it is an active influencer in the sector – the way it structures its admissions process, any metrics it sets, any information it provides will have an influence on behaviours in the sector, positive or otherwise” (Awarding organisation)

Concern was expressed that that the existence of such a report could influence the pre-HE qualification landscape by having an impact on:

- level 3 qualifications developed by AOs
- courses and qualifications offered by schools and colleges
- the take up of courses/qualifications by learners.

The risk that historical HEI behaviour, with regard to patterns of accepted qualifications, could be reinforced by trends shown in the report was also highlighted and therefore the reported data may simply “perpetuate current circumstances”. Some respondents felt that this could have negative impacts including insufficiently supporting widening participation principles, narrowing the pre-HE qualifications market and limiting aspirational applications by learners.
6.2. Impact

**HEIs**

HEIs welcomed the potential operational time-saving that this report could facilitate by centralising information. Many anticipated making use of the report during their annual admissions policy reviews and felt that it would be a useful information resource for their admissions staff. Benchmarking their own institution against the trends data presented and sourcing information about new qualifications were the two most commonly anticipated uses of the report.

The potential for reported trends to also be of use to HEIs when considering their recruitment and retention strategies was also recognised.

**Other respondents**

Other respondents largely did not identify potential impacts as this would depend on the specifics of what data was presented, and who the report was accessible to which the consultation document did not confirm. Those SCAs who did comment imagined using the report to inform their advice to learners.

6.3. Supporting fairness, transparency and efficiency in HE admissions

Although very few respondents disagreed that the principles of fairness, transparency and efficiency could underpin the production of an annual report, comments suggested that levels of agreement were only tentative in light of the lack of clarity about the specifics of what the report would contain and the concerns raised around potential for misinterpretation of data.

It was felt that, if the report were shared with SCAs then transparency for learners may well be improved by the report.

There were concerns however that future applicants might be discouraged from applying based on trends in previous acceptance data and this led a number of respondents to conclude that widening participation might be compromised because of an annual report and that this would reduce fairness.

Similarly with efficiency, centralised, accurate and timely information was universally welcomed and it was felt that this would assist HEIs in their own research and policy developments. However, fairness could be compromised depending on how HEIs choose to make use of the information reported.

6.4. Scope of report

The suggestions for report content that were outlined in the consultation document were welcomed, although HEIs acknowledged that at this stage there is insufficient detail to get a clear idea of what the report would entail.

Some HEIs made suggestions for useful analyses that could be considered for inclusion:
• analysis by mission group: a minority of HEIs suggested this would be useful but many reiterated the importance of retaining autonomy in admissions decisions and not presenting data that would allow individual HEI policies to be challenged
• qualifications presented in offers against actual acceptances
• qualifications on entry against degree outcomes.

6.5. Timing of publication

Although many respondents stressed that in order for the report to be most useful it would be essential for it to be ‘timely’, there was little consensus with regard to what the most useful time to publish the report would actually be. Common suggestions from HEIs included:

• December/January
• July
• September/October.

Many mentioned the usefulness of having the data as soon as possible after the end of cycle.

Lead times for research and development and the production of prospectuses, admissions policies and other information were raised, and it was questioned whether there would be sufficient time for any annual report to influence the next cycle, or whether in fact, a lag of at least one year would be inevitable.

6.6. Communications and guidance

Given that this recommendation was presented in less detail in the consultation document, respondents’ comments inevitably requested a clear need for further information and clarity on the purpose, content and intended use of the report.

It was clear that communications should ensure all intended audiences are aware well in advance that the report exists, who it is intended for, and when and how it will be published. There were some requests for the report to include an explanation of the methodology used and this was echoed by a number of other comments which stressed that it would be crucial for data presented to be accurate and reliable in order to ensure confidence in its use. Detailed commentary supporting the data and clarifying any limitations in its use was requested.

There were calls from HEIs for regional ‘launch’ or ‘training’ events to accompany the publication of the report and also a few suggestions for online ‘tutorials’.

Should the report be shared more widely than just an HEI audience it was felt that an unambiguous programme of IAG for learners and SCAs would be needed to help to mitigate the risk of misinterpretation of data and the potential for level 3 qualifications to be affected.
7. **Recommendation 6: Optional tools for those HEIs wishing to make more flexible grade-based offers.**

The Qualifications Information Review recommends the provision of optional tools for those HEIs wishing to make more flexible grade-based offers, subject to consultation with the sector.

7.1. **Agreement in principle**

This section was primarily aimed at HEIs and the consultation document provided only limited detail about the proposed optional admissions tools. As such, few other respondent groups answered questions in this section or provided comments.

**HEIs**

More than half ($r=67$ $n=109$) of the HEIs responding agreed in principle with this recommendation.

Those HEIs in support of the development of optional admissions tools recognised the potential benefits to less experienced admissions staff and to HEIs whose applicants typically present a wide range of qualification types.

“*With the growing numbers of HE students in an FE environment together with the growing apprenticeships progression requirements we need admissions tools so that admissions tutors can confidently make decisions as to the applicability of a wide range of L3 qualifications.*” (FE College)

It was felt that a tool of this type could save time for these admissions staff and would help to increase confidence in the offers made, especially in terms of consistency. Consistency of offers across different institutions was also mentioned, although some considered this to be a negative, rather than a positive, potential impact as it could detract from HEIs’ autonomy.

Those who disagreed with this recommendation felt that an online calculator tool could enable a mechanistic and overly-simplified approach to admissions which would detract from the professionalism of admissions staff and the knowledge and experience held by individual institutions. For those who did not fully support the academic demand rating (recommendation 3) there were concerns that the tool would base its calculation of equivalencies on this measure which may not reflect equivalencies that HEIs agreed with and valued, and would omit those qualifications which were not demand-rated at all, therefore rendering the tool fundamentally flawed. In addition, it was felt that optional admissions tools would not be able to take account of the subject relevance necessary for different courses and could therefore generate only generic qualification-type equivalencies which may not be as useful.

There was also a significant concern from some HEIs that if learners and their SCAs had access to these optional admissions tools, opportunities may arise where learners would challenge offers made by HEIs that differed from the qualification equivalencies suggested by the tool. HEIs stressed that retaining autonomy in decision making is important, as is making a holistic assessment of each applicant based on the HEI’s own knowledge of previous applicants’ performance on their courses.
“Although the tool proposed is not necessary, it could be a useful aid to [some] admissions staff. However, the difficulty could become that applicants would see the calculator’s judgement as final when a final decision would always need to be taken by the institution.” (University Alliance member HEI)

Some questioned whether there would be a need for such tools if other recommendations were effectively implemented, (i.e. the QIPs and demand rating) and others commented that in effect a tool of this type would simply recreate a Tariff system.

More clarity was needed on how the development of any optional admissions tools would be funded especially as not all HEIs would plan to use it.

**AOs and SSCs**

AOs were divided on their level of agreement with this recommendation (agree/strongly agree r=8, neither agree nor disagree = 7, disagree/strongly disagree = 10, n=29). Those in agreement felt that the tool may allow increased consideration of some vocational qualifications by some HEIs whereas those who disagreed echoed the concerns raised by some HEIs about the comprehensiveness and validity of the judgements that would underpin the tool.

7.2. **Impact**

HEIs imagined that optional admissions tools would be most useful when evaluating applicants with mixed profiles:

“It would need to support not just a direct one for one qualification i.e. A level to BTEC but rather A level/Tariff to BTEC + A level + AS level from one applicant.” (GuildHE member HEI)

Those HEIs who felt that they would make use of such tools imagined that they could save time for admissions staff assessing more complex applications. Other HEIs acknowledged that they may need to devote time to staff training in use of the tools and to developing institutional policy to formalise and provide guidance to staff in relation to making consistent offers based on outcomes from the tool.

7.3. **To what extent does this recommendation support fairness, transparency and efficiency in HE admissions?**

Many respondents were unsure about the extent to which this recommendation might support fairness, transparency and efficiency, especially as the exact nature of the tools was not defined and it would be dependent on the implementation of other recommendations and on how individual HEIs made use of the tools.

“It could be seen to be ‘fair’ as it would take much of the guesswork out of comparing qualifications, but is highly mechanistic and does not take into account other aspects of the application. Efficiency may not be achieved if more applicants question the offer they have been made and institutions are asked to account more for the reasons for their decision making.” (University Alliance member HEI)

Although it was felt that transparency for applicants may be improved if the optional admissions tools were made available to learners and their advisers, some HEIs were concerned that in
doing this they may face more challenges to the offers they make, particularly if they had chosen not to opt-in to the use of the optional tools but to instead make offers based on qualification and grade equivalencies that they determined independently. If only HEIs had access to the tools however then transparency for applicants could be further compromised.

Efficiency savings, in terms of admissions staff time, were identified by HEIs who felt they would be likely to make use of the tool, although others cautioned that this quicker processing time may be too mechanistic and would be too inflexible to reflect subject relevance and contextual data relevant to individual applicants.

Some felt that tools would provide easier access to information about some qualifications which are typically less familiar to admissions staff and may increase the consistency of offers made, both within and across institutions, and that these aspects might lead to fairer admissions decisions.

“It depends how it is used. If the online calculator were used mechanistically, it would increase consistency but this does not necessarily equate to greater fairness since it only applies to one aspect of an application. It may help to support ‘fairness’ if it means that certain less familiar qualifications can be meaningfully compared, avoiding the possibility that they could be regarded as ‘less satisfactory’ just because they are less familiar.” (Russell Group member HEI)

7.4. Would you/your organisation want to use such tools within admissions?

Less than half of all HEIs (r=45 n=109) indicated that they would use the optional admissions tools although many were unsure and commented that they would withhold judgement until more detailed proposals were available. Those that did indicate they would be likely to make some use of the tools within their admissions included some HEIs from all mission groups. Many comments though were still hesitant, called for more information, and reiterated that tools could be another useful source of information without generating ‘binding’ decisions. A number of HEIs noted that they would welcome the opportunity to be involved in user-testing during the development of any tool and/or they would be likely to pilot their use within their own institution before making a final judgement on whether to use them or not.

7.5. What guidance and communications support would be necessary to support implementation of this recommendation?

HEIs called for a clear and unambiguous statement of intent and expectation with regard to the use of optional admissions tools. As well as clarifying that HEI autonomy in decision-making would not be compromised there was a request for clear statements regarding the limitations of use.

HEIs would welcome best practice guidance and training opportunities, including face-to-face regional events and online tutorials, for their staff to familiarise themselves with using the tools appropriately.

“It will be helpful to give working examples of the how the tools should be used.” (Russell Group member HEI)

To counter HEIs’ concerns around learners being able to challenge offers made by HEIs, there was a demand for clear IAG for SCAs to ensure that learners fully understood that use of the
admissions tools was optional and not mandatory for HEIs, and therefore applicants should not necessarily expect offers to reflect those suggested by the tool.

AOs also called for “…a transparent explanation of how comparability will be achieved.”

8. Releasing the full potential of the review outcomes

8.1. Revision of products and services

Comments from HEIs with regards to improvements to UCAS products and services related primarily to the use of data. These included:

- improvements to the capture of data including the consistent coding of qualifications across all systems
- releasing of applications only when all qualification information and fields are completed
- links from the qualifications in applications to QIPs
- the requirement for the provision of data only once and linking up of UCAS systems in an intelligent and user-friendly way
- expanding the scope of QIPs to include international and European qualifications
- alignment of UCAS systems with those of key stakeholders in recognition of changing policy demands (e.g. HEFCE AAB equivalencies).

In terms of improvements for the applicant and their advisers comments included suggestions for:

- products that are geared to the non-traditional learner
- streamlining the learner journey through the application process
- the more intelligent use of data including information about the rates of progression to HE from various different qualifications to “help inform students in making the choice of which qualifications would best support their aspirations”.

8.2. Consideration of education and HE environment across the UK

Just under half of all respondents (r=148 n=304) felt that the proposals did take sufficient account of the education and HE environments in their part of the UK.

**HEIs**

“The Northern Ireland Entitlement Framework is promoting an increasing mix of traditional (general) and non-standard (applied) qualifications in applicant profiles. As a consequence, it has become more challenging to make equitable and informed judgments upon the relative equivalence of qualifications and, in particular, their fitness for purpose in satisfying course entry requirements. The recommendations contained in this consultation appear to go a long way towards addressing these growing concerns.” (Non-aligned member HEI)
“At present the Scottish awards system works well and with only one major awarding body we already have good quality information. What we need to see is a similar level of data on qualifications from the rest of the UK and from outside the UK”. (Scottish HEI)

“Yes, however we would draw attention to the point made in relation to recommendation with regard to ensuring that the proposals outlined in this recommendation are coherent with the current HEFCE consultation on future teaching funding policy, and in particular, the equivalences which will inform future policy on AAB+ and student number controls”. (Russell Group member HEI)

Comments from HEIs who disagreed primarily focused on the amount of change in the pre-HE and HE sector at the moment and the amount of unknowns that there currently are. Concern was also expressed about the impact of the proposed changes (specifically a demand scale based on academic demand alone) on WP and the general move (with the reform to A levels) to an increasingly elitist HE sector.

**SCAs and learners**

There were comments from schools, colleges and advisers and learners about specific qualifications, such as Scottish Highers and ensuring that these are better understood by English HEIs. There were also comments regarding the lack of clarity as to how the Welsh Baccalaureate would be treated.

### 8.3. Are the proposals flexible enough to accommodate any future changes to the UK qualification and examination systems?

The majority of respondents who answered this question across all stakeholder groups felt that, given the amount of change in the sector, it was very difficult to state whether they felt the proposals are flexible enough.

Concerns were raised about the perceived focus of the proposals on A levels and academic demand which was not flexible enough to consider other existing qualifications and therefore may not be flexible enough to also accommodate any future changes.

“We do not believe the recommendations recognise the growing levels of apprentices and that increased investment in this area may result in more apprentices wanting to gain access to HE. We are also concerned about how Access to HE and Welsh Baccalaureate programmes will be considered in the proposed system” (AO representative body)

### 8.4. What additional features could be included in the new qualification information system

**HEIs**

HEIs across all mission groups commented on the desire to have information about international and European qualifications included in the system.

Regular updating and notification of changes to qualifications would be appreciated and HEI members of the Russell Group and University Alliance commented on the desire to have level 2 qualifications included.
SCAs

SCAs expressed desire for links between QIPs and the qualifications selected by applicants when completing application forms (to reduce errors based on similarity of titles).

9. Implementation and resourcing

9.1. Perceived efficiency benefits and suggestions for how any disadvantages could be minimised

It was recognised that there would be short term costs and resource implications with regards to reviewing and updating entry requirements and offer libraries and staff training and development and that to realise the full benefits and efficiencies the system would have to be fully integrated into the application process.

"Initially this will bring additional costs of training staff on the new system & incorporating new data within our current recording system. There will be further costs in reviewing all our entry requirements against the newly developed equivalences. Only later when a new qualification is assessed is there a potential to save; however this is limited due to the small number of new qualifications added each year. It is not clear that the outcome of these proposals will deliver ongoing cost savings.” (Million+ member HEI)

Some HEIs were unconvinced by the benefits, and felt that it is the wrong time to be making changes given the uncertainty already in the sector.

Concerns were also raised about the unintended consequences that the proposals may lead to.

9.2. Paying for access to an enhanced service?

Almost half of all HEIs responding to this question said they ‘did not know’ (r=51 n=109) and felt unable to comment on this question given the lack of clarity they felt there was about the new system.

32 HEIs said their institution would not be willing to pay for an increase. Comments suggested that consideration of a more detailed proposal detailing any proposed capitation fee increase, and the associated benefits, would be appreciated by HEIs with as much advance notice as possible.

9.3. Particular needs of different stakeholder groups

Suggestions regarding engagement included extensive, current and realistic guidance and materials for all learners, including independent and mature learners and other stakeholder groups.

“There will be a need for very clear and simple advice for the growing number of individual applicants who do not have the help/advice from schools”. (GuildHE member HEI)
Other specific suggestions included:

- clear, concise and up-to-date website and social media updates
- widespread regional events and consideration of Welsh language provision of IAG
- involvement of examination and awarding bodies.

10. Further Comments

“Despite the acknowledged limitations of UCAS Tariff the system that is developed to replace it must be appropriately valid and reliable, must meet the needs of all learners and all constituents of learners, and all providers of HE” (1994 Group member HEI)

“We believe that UCAS should retain the Tariff due to its flexibility and simplicity. We believe it will be easier to set entry requirements using the Tariff due to the wide variety of qualifications that are now available for study. Effort could be transferred to enhancing the current Tariff to create a more comprehensive and comparative system”. (Million+ member HEI)

“Notwithstanding the University X’s endorsement of the proposed recommendations, we would not wish institutional autonomy to be undermined and would defend the requirement for control and responsibility over our own admissions policies, entry requirements and admissions decisions. The University is best placed to assess the preparation that particular qualifications provide for entry to our particular course portfolio, whatever information is provided to facilitate that process”. (Russell Group member HEI)

“It appears that the new QIPs will draw upon existing information. There is a risk therefore that embedded flaws with existing data move into the new framework. Hence, robust quality assurance processes need to be in place to ensure that information is correctly transferred (validated) from source to destination”. (Russell Group member HEI)

“Great care needs to be taken that one useable but less than perfect system is not being replaced with another one, which actually appears to make the whole process more complex. It must also be remembered that the process of decision making is not and should not be mechanistic, and any tools that UCAS can provide to assist in the process of fair and transparent offer-making are not used in isolation but as a suite of measures which help to cater for applicants from all ages and backgrounds”. (University Alliance member HEI)

“The consultation is a document which talks about fairness and transparency but fails to ask the question about how the system can work to support people who don't take the traditional academic route in to HE”. (Awarding organisation)