

# **UCAS response to the Ofqual Consultation on New A Level Regulatory Requirements**

**January 2014**

A large, abstract red shape is located at the bottom of the page, mirroring the design element at the top. It features various shades of red and geometric forms, creating a dynamic, layered effect.

UCAS' mission is to help learners make informed choices that best suit their aspirations and abilities and maximise their opportunity for success, and to benefit universities and colleges providers through the provision of shared services.

UCAS provides information and advice, course information, entry requirements, and application services to around 670,000 applicants to over 370 UK higher education providers (HEPs) each year. These applicants make over 2 million applications to higher education (HE) courses. UCAS services support applications for full-time HNCs, HNDs and foundation degrees as well as undergraduate and some postgraduate degrees.

UCAS welcomes the opportunity to comment on AS and A level reform in England. Paragraph 2.1 of the consultation states that universities have "the strongest interest in maintaining standards in A levels." Although we agree that A levels are of importance to universities, A levels are also of importance to a wide range of stakeholders, such as schools, colleges, students, employers and government departments. UCAS believes that each of these stakeholders has a strong interest in maintaining standards in A levels and that no one particular interest is stronger than another.

### **The use of A levels for progression to HE<sup>1</sup>**

A levels are the predominant qualification used for progression to HE. Analysis from the UCAS 2013 End of Cycle report provides an up to date picture about the use of A levels in supporting progression to HE by looking at both acceptance rates (number of acceptances divided by number of applicants) and entry rates (the proportion of a total population group that has been accepted into HE).

The acceptance rate for English 18 year old applicants holding A level qualifications in 2013 was 86%, one percentage point lower than the highest acceptance rate for A level applicants recorded in 2008. This follows an upward trend seen since 2010. For comparison, the acceptance rate for English 18 year olds holding at least one BTEC qualifications was 81% in 2013, which follows a similar, but steeper, upward trend. (Figure 1, Annex A).

Correspondingly, 25.5% of the 18 year old population in England entered HE holding at least one A level. This is the highest proportion ever recorded following a percentage point increase from 2012. For comparison 5.8% of the 18 year old population in England entered HE holding a BTEC qualification, the second most commonly used qualification type used for entry into HE. It is also worth noting that the increase in the entry rate of BTEC students has

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<sup>1</sup> The following evidence is taken from the UCAS Undergraduate 2013 End of Cycle report. The report analyses the entire applications cycle and provides the most detailed understanding to date of admissions to HE. The report contains information regarding a wide range of aspects of the admissions cycle, including the different progression trends of applicants depending on the qualifications that they hold. The full report can be found here: <http://www.ucas.com/sites/default/files/ucas-2013-end-of-cycle-report.pdf>

been largely driven by applicants holding BTEC qualifications in combination with A levels (Figure 2, Annex A).

The entry rate for English 18 year olds holding A level qualifications increased for students of all backgrounds in 2013 (as defined by POLAR2<sup>2</sup>). However, a sharp differentiation continues to exist across each POLAR2 group, with young people from more advantaged areas substantially more likely to enter HE holding A levels than those living in more disadvantaged areas. 12.3% of 18 year olds in Quintile 1 (more disadvantaged areas) holding held A levels were accepted into HE. This compares to 42.6% for 18 year olds in Quintile 5 (those living in more advantaged areas). (Figure 3, Annex A)

## **The AS and HE**

### ***The use of the AS in HE admissions<sup>3</sup>***

UCAS notes that the proposed objectives of the AS do not make references to progression to HE, unlike the full A level. Paragraph 5.7 also explicitly states that it “is not a purpose of the AS qualification that it should support progression to higher education.” Intelligence from UCAS member institutions indicates that the AS does have an important role in the admissions process and in facilitating progression to HE.

HEPs are autonomous in the decisions that they make regarding applicants and the manner in which they reach these decisions. Therefore, the use of the AS in HE admissions is variable across HEPs. Some institutions will view the AS as an external validation of an applicant’s predicted grades or as an indication of their progression towards their final A level results.

Other institutions may specifically list AS grades in their entry requirements or make offers based upon them, either as a specifically referenced qualification or as part of a Tariff offer. 92.5% of courses listed on UCAS Course Search as available for applications in 2014 make reference to the AS in their entry requirements.

### ***The AS and predicted grades***

Under the current system, a learner will normally receive their AS results at the end of the first year of A level study and it is likely that their predicted grades will be largely based upon these. As the AS contributes to a learner’s final A level outcome, there is a relationship between a learner’s AS results, predicted grades and final A level results. However, if the AS is to be

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<sup>2</sup> Developed by HEFCE and classifies small areas across the UK into five groups according to their level of young participation in HE. Each of these groups represents around 20 per cent of young people and is ranked from quintile 1 (areas with the lowest young participation rates, considered as the most disadvantaged) to quintile 5 (highest young participation rates, considered most advantaged).

<sup>3</sup> Applicants are asked to input their AS grades into the UCAS Apply form. Predicted grades are also input at the same time and the institution will receive this information at the point of application.

decoupled from the full A level, the relationship between the AS and predicted grades and final A level results will not be as strong, and as a result, there is a possibility that the accuracy of predicted grades may be impacted. Some schools and colleges may introduce A level mock examinations to provide additional information to inform the prediction of grades.

The offer a HEP makes to an applicant will be, in part, based on an applicant's AS and predicted grades. Therefore, any potential increase in the variability between predicted grades and A level results is likely to cause greater uncertainty for institutions in managing admissions.

Receiving AS results at the end of year 12 is an important motivational factor for students, both in terms of spurring performance and helping to manage expectations. Losing this checkpoint may impact of subsequent HE course choices at both ends of spectrum.

### ***The AS and co-teaching***

UCAS welcomes the comments in relation to the supporting co-teaching of AS qualifications alongside A level qualifications. However, paragraph 5.5 suggests that not all subjects will be able to be co-taught. This is likely to challenge HEPs as it means there may be inconsistencies regarding the use of the AS for application to HE depending on the subject a learner has undertaken.

Variation in the ability to co-teach AS subjects is likely to be a challenge for schools in planning and resourcing their curricula and also likely to reduce the flexibility students have once they have begun their programme of study. Students who are studying an AS as part of a co-taught A level will be able decide whether to continue with their studies or opt for the AS qualification whilst those that are studying subjects that are unable to be co-taught will not have this flexibility. Additionally, the current model allows for a broader curriculum. Students in year 12 can pursue 4 or 5 AS qualifications and are then able to drop their less favoured subject(s) in year 13 as they mature and their interests develop. If the use of the AS were to decline as a result of these reforms, having to pick 3 A level subjects in year 12 could reduce the range of subjects studied and potentially reduce attainment. It is also important not to overlook the intrinsic benefits of not specialising too early.

We believe that it is important that Ofqual provide information regarding the subjects that can and cannot be co-taught to ensure HEPs are fully aware of the context in which an A level has been undertaken. The phased introduction of revised A levels means that Ofqual also will need to clearly identify which qualifications have been reformed to ensure that all stakeholders are aware of the exact qualification a learner has undertaken.

It is not clear how schools and colleges will to react to the reform of the AS. Some centres may continue to offer the qualification at the end of the first year of A level study, whereas some may choose to only offer the full A level.

The way centres react to these reforms will, in part, be driven by the affordability of AS examinations and their treatment in school performance tables. The potential varying use of the AS is likely have an impact on the admissions process as we may see certain cohorts of learner more or less likely to apply to HE using the AS.

UCAS would like to suggest that Ofqual models the potential differing uses of the AS by school and colleges and assess whether these differing uses align with the policy objectives of decoupling the AS. For example, an increase in teaching time is unlikely to be achieved if schools and colleges continue to offer the AS to pupils, or if they offer mock examinations in its place.

### **Assessment**

We do not feel it appropriate for UCAS to comment on the assessment arrangements of specific subjects, although we note that there is a risk that learners taking the AS examination at the end of year 12 may end up being re-examined on the same material if they take the same subject at A level.

We would also like to comment on the general direction of travel for the assessment practices of A levels.

The consultation proposes that A levels are to be assessed by written examination only unless such an approach does not provide a valid means of assessment. Such an approach may not assess the skills and abilities of the entire learner cohort undertaking A levels. However, we do acknowledge that provision has been made to allow candidates to demonstrate more practical skills.

One of the primary purposes of the A level is to support progression to HE. HEPs utilise a number of assessment techniques to examine students on their courses, including both written assessment and non-exam assessment, therefore the inclusion and reporting of rigorous non-written assessment in A levels is likely to be welcomed by some HEPs as an additional source of information.

### **Impact on the uptake of vocational qualifications**

Although not directly consulted upon, the reform of A levels does raise a potential issue in relation to the uptake of vocational qualifications.

DfE data suggests that the proportion of students taking purely academic qualifications has declined from 70% in 2008 to 51% in 2012. This trend may continue if students increasingly opt to study vocational qualifications, or a mixture of academic and vocational qualifications, following the introduction of revised A levels that are designed to be more demanding, and the de-coupling of AS and A levels.

If this were to occur, Ofqual and Department for Education will need to ensure that these qualifications are sufficiently high quality, rigorous, robust and offer

a broad range of progression opportunities. UCAS notes that DfE has already introduced new policies in this area in an attempt to increase the rigour of vocational qualifications.

UCAS data suggests that vocational qualifications, such as BTECs, do not facilitate progression to HE in the same way as A levels. For example, for every 100 A level students accepted into high tariff institutions<sup>4</sup> in 2013, 3 BTEC applicants were accepted. By comparison, 49 BTEC students were accepted for every 100 A level students at lower tariff institutions (Figure 4, Annex A).

Given that a larger proportion of learners from disadvantaged backgrounds take vocational qualifications than those from more advantaged backgrounds, care will have to be taken to ensure that any increase in the number of learners studying vocational qualifications does not impact on progress made in relation to widening participation and fair access in recent years.

### **UK divergence**

The qualifications landscape is becoming increasingly diverse across the UK, particularly in relation to A levels and GCSEs. The current direction of travel for reform suggests that we may see fundamentally different qualifications in England, Wales and Northern Ireland but with the same title. For example, A levels in England will be linear with the AS component decoupled. A levels in Wales and Northern Ireland will not share this structure.

UCAS believe that the imminent divergence in the fundamental structure of A levels makes it important for regulators and relevant departments in England, Wales and Northern Ireland to work together to ensure consistency in standards across qualifications of the same title. A levels should continue to provide equal opportunities for learners regardless of where they are studied.

### **Timeline for qualifications reform**

UCAS notes that 2014, 2015 and 2016 will see the first teaching of a wide range of revised qualifications throughout the UK. These include reformed A levels and GCSEs throughout the UK, the revised Welsh Baccalaureate, Scottish Highers and Advanced Highers, revised vocational qualifications in England and the revised Access to HE Diploma.

The Chief Regulator of Ofqual recently noted in a letter to the Department for Education in relation to A level reform that the “introduction of new GCSEs and A levels at the same time will place a considerable burden on schools<sup>5</sup>.”

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<sup>4</sup> An institution that belongs to the higher tariff group, from the grouping of institutions based on the average levels of attainment of their accepted applicants (summarised through UCAS Tariff points) in recent cycles. The other two groups are medium tariff institutions, and lower tariff institutions. Each group of institutions accounted for around a third of all UK 18 year old acceptances in recent cycles.

<sup>5</sup> <http://www.ofqual.gov.uk/files/2013-03-22-letter-to-secretary-of-state-for-education-a-level-reform.pdf>

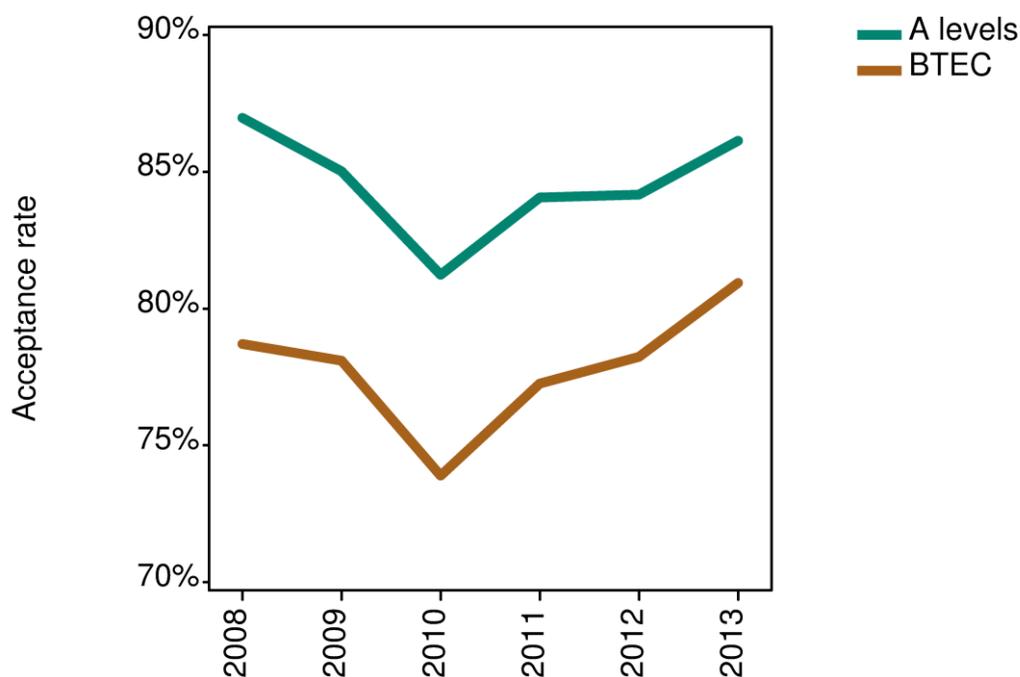
HEPs will share this burden as they are faced with new and revised qualifications. The volume of reform and the likely divergence in approach means that HEPs will require detailed, high quality information regarding these changes to qualifications to support admissions practices. Significant change and/or divergence in approach may require institutions to review their entry requirements and offer making strategies.

UCAS is currently looking at ways in which it can support the HE sector by providing high quality qualification information to our members through the New Qualification Information System (NQIS) project. This includes the publication of detailed “qualification information profiles” and the replacement of the current UCAS Tariff with a new, simpler points system. We are also looking at how we can support HEPs, schools, parents and students through the provision of high quality information and advice regarding qualifications reform. We would be keen to engage with Ofqual as we continue to develop our qualifications information provision.

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

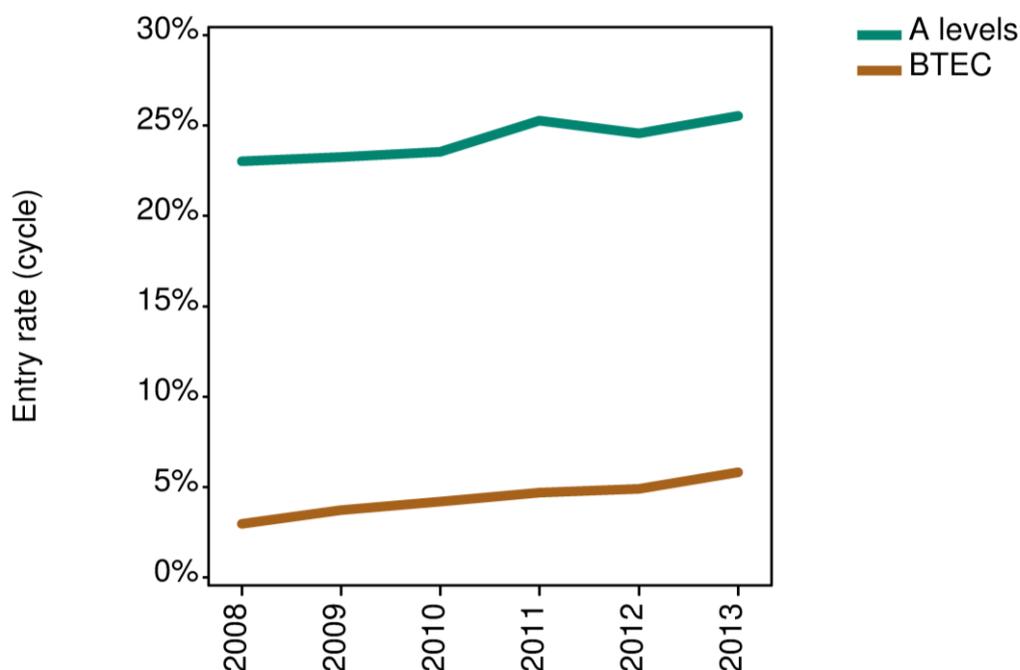
Annex A: Evidence from UCAS End of Cycle report 2013

Figure 1: Acceptance rates for English 18 year olds by type of qualification held



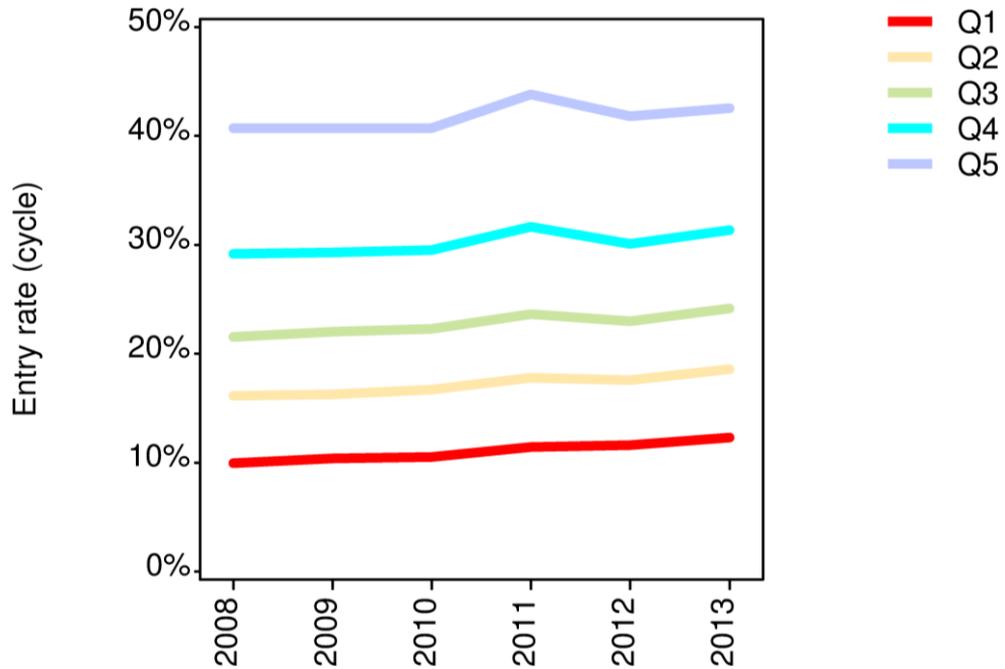
Source: Figure 48 from 'UCAS End of Cycle Report 2013', www.ucas.com

Figure 2: English 18 year old entry rate by type of qualification held



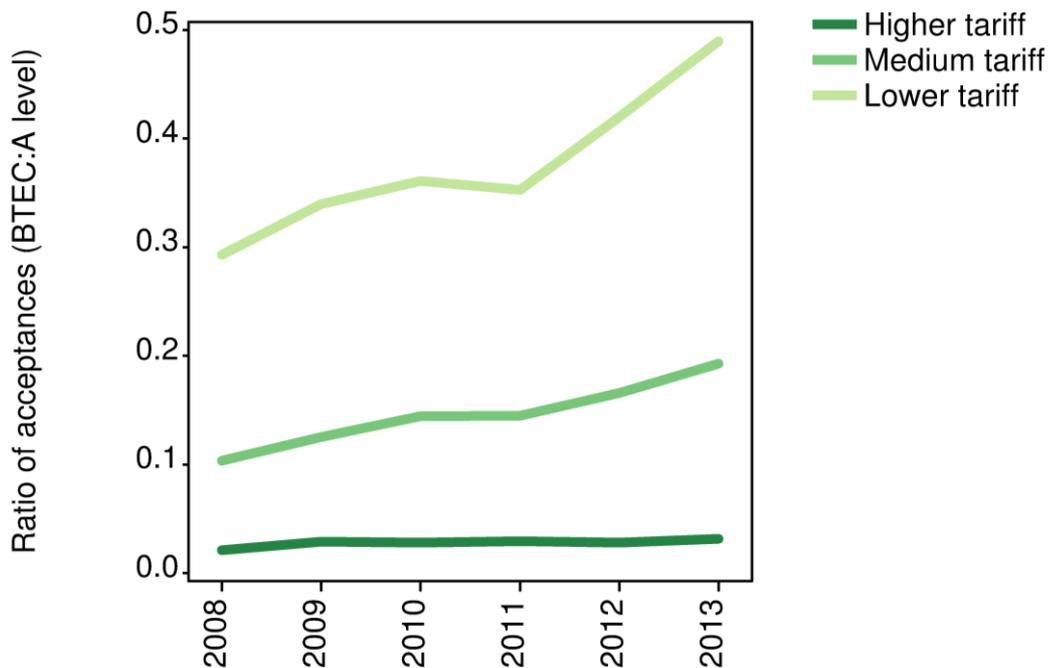
Source: Figure 44 from 'UCAS End of Cycle Report 2013', www.ucas.com

**Figure 3: English 18 year old entry rates by POLAR2 group (accepted applicants holding A levels)**



Source: Figure 45 from 'UCAS End of Cycle Report 2013', www.ucas.com

**Figure 4: English 18 year old ratio of acceptances holding BTECs to acceptances holding A levels**



Source: Figure 47 from 'UCAS End of Cycle Report 2013', www.ucas.com