

## Response to Post-Qualification Admissions Reform Consultation

The Russell Group represents 24 leading UK universities which are committed to maintaining an outstanding teaching and learning experience and world-leading research. Our universities teach a quarter of all undergraduates and four out of five doctors, and support over 250,000 jobs across the UK. We welcome the opportunity to respond to this important consultation launched by the Department for Education (DfE) to establish a suitable model for a post-qualifications admissions (PQA) system.

The Russell Group shares the Secretary of State's vision for a higher education admissions system which works for those who use it, supports world class universities, and levels the playing field for disadvantaged applicants.<sup>1</sup>

Of the models illustrated in the consultation document, **the Russell Group considers that the Post-Qualification Offers (PQO) option would be the most workable** for applicants, schools, colleges, and universities. However, there are several issues (outlined in table 1) which the DfE would need to consider and address if it were to implement this approach. It is also important to appreciate that any new system would take a significant amount of time, effort and financial investment to design and implement successfully – and the early years of its operation are likely to be more challenging for all stakeholders, and perhaps for students in particular. In developing any new system, we recommend the DfE considers the following principles to underpin its functionality:

- (a) Ensuring there is **sufficient time between exams, results, offer-making and course start dates** to run a robust and comprehensive admissions process without significant delays to the start of term.
- (b) Building in the **flexibility and efficacy** to support admissions across the **full range of courses and institutions** across the sector, including those which require additional testing or interviews.
- (c) Ensuring higher education in the UK remains **internationally competitive in attracting overseas students**, and that the admissions process supports them to join UK universities.
- (d) Boosting resources for **information, advice and guidance (IAG) in schools and colleges** to improve the quality of support provided, especially if applications or offers are made outside of term time.
- (e) Ensuring consideration is given to the **transition period** between the current system and the new one and how this can be supported effectively (e.g. with additional funding, guidance and other support from DfE to manage the change process).
- (f) Developing any new system in **consultation with those in the Devolved Administrations, as well as in England**, to ensure it functions for **institutions across the UK**.
- (g) Continuing to **protect university autonomy** on admissions decisions.
- (h) Ensuring the system **fully considers all students**, including those who do not follow traditional routes into higher education such as mature students and private candidates.

Any new admissions system which aims to remove inequality for under-represented students should not be developed without considering broader factors such as attainment gaps between children from under-represented backgrounds and their peers. **The Russell Group has advocated for a national strategy to tackle inequality across the educational lifecycle and beyond, and for this to be supported by a centralised Office for Social Mobility.** We believe that developing a new admissions system as part of a broader strategy to address education inequalities would be the best way to deliver meaningful change.

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<sup>1</sup> Foreword by the Secretary of State for Education, *Post-Qualification Admissions Reform Government consultation* (2021)

## 1. Issues with the current system

- 1.1 The Universities UK Fair Admissions Review found an appetite for reforming aspects of the higher education admissions system among universities. This includes the need to develop greater transparency around admissions practices, and to consider removing unfair admissions practices such as ‘conditional unconditional’ offer-making.<sup>2</sup>
- 1.2 Russell Group universities have also identified a need to make their admissions practices more transparent, particularly to applicants who are eligible for a contextual offer. Our universities have committed to providing this information prominently on their websites and embedding it across their outreach activities.<sup>3</sup>
- 1.3 Our members are mindful of the reported inaccuracies in predicted grades,<sup>45</sup> and therefore do not use these on their own as an indicator of an applicant’s suitability for a course but consider a wide range of other factors including prior attainment, subject and career exploration, activities considered to be good preparation for higher education, and contextual factors which may have impacted attainment. As part of its review of admissions, **we urge Government to ensure the sector routinely has access to better contextual information, including free school meals (FSM) eligibility data, so that universities can identify, target, support and track prospective applicants from disadvantaged and under-represented backgrounds.**
- 1.4 A move to a post-qualification admissions system would not change the more significant issue of low attainment among disadvantaged groups. DfE data shows that students not classified as disadvantaged are over four times more likely to achieve grades ABB or better at A-level than those who are disadvantaged.<sup>6</sup> **A focus on supporting the attainment of students under-represented in higher education is needed alongside any change to the admissions system to support widening participation.** In our recent *Pathways for Potential* report, the Russell Group called for a national strategy to join up the efforts of universities and schools, colleges, local authorities, charities, and employers, co-ordinated through a new Office for Tackling Inequality.<sup>7</sup>

## 2. The post-qualification admissions (PQA) system models

- 2.1 The consultation presents two models of delivery for a PQA system. Our analysis of the opportunities and concerns relating to each are set out in table 1.

**Table 1: analysis of the different PQA options**

PQ option	Opportunities	Concerns
Post-qual Application	<ul style="list-style-type: none"><li>Removes the need for predicted grades from the admissions process.</li></ul>	<ul style="list-style-type: none"><li>Students could lose out on IAG from the point of application, as schools and colleges are mostly closed during the summer holidays.</li><li>The timeline for universities to review applications and make admissions decisions would be significantly compressed. This would make it very difficult to make considered offers to students. It would be particularly challenging to make contextual offers in a compressed timeframe, especially where additional information is needed (e.g. evidence of care-leaver status).</li></ul>

<sup>2</sup> Universities UK, *Fair Admissions Review June 2019 – November 2020* (2020)

<sup>3</sup> Russell Group, *Pathways for Potential* (2020)

<sup>4</sup> G Wyness, *Rules of the Game: Disadvantaged Students and Admissions Practices* (2017)

<sup>5</sup> M Corver, *Predicted grades and university admissions* (2021)

<sup>6</sup> Russell Group, *Pathways for Potential* (2020)

<sup>7</sup> Russell Group, *Pathways for Potential* (2020)

		<ul style="list-style-type: none"> <li>• For courses where the number of qualified candidates exceeds the number of available places, universities are likely to use a gathered field (explored in section 3.2) to set the entry grade threshold. This may reduce overall transparency in the process.</li> <li>• Universities would have to rethink admissions testing (e.g., interviews, pre-entry exams, and auditions), as it would be extremely challenging to undertake this given the proposed timelines. This would make admissions decisions for capped subjects (e.g., medicine) and the creative arts very difficult.</li> <li>• A compressed time period may also specifically disadvantage students with physical and learning disabilities, as well as those with mental health conditions, as universities may not have enough time to ensure appropriate assistive technology and other practical support is in place.</li> <li>• There may be an impact on the Scottish education system (explored in section 6).</li> </ul>
Post-qual Offers (PQO)	<ul style="list-style-type: none"> <li>• Could remove the need for predicted grades by universities, as well as unconditional offer making.</li> <li>• Universities can engage with the student prior to application, which is particularly important for students from widening participation backgrounds, as well as those with disabilities and mental health conditions.</li> <li>• Students can still receive IAG from schools and colleges when making applications.</li> <li>• Universities will be able to deliver additional entrance tests, including interviews, auditions or exams throughout the year. However, for some courses, universities may need to test more students in lieu of predicted grades.</li> </ul>	<ul style="list-style-type: none"> <li>• For courses where the number of candidates exceeds the number of available places, universities are likely to use a 'gathered field' (explored in section 3.2) to set the entry grade threshold. This may reduce transparency and increase uncertainty for applicants ahead of their exams.</li> <li>• A lack of historical data upon introduction of the new system will make numbers harder to control. At the moment, our members are able to predict applicant behaviour and so can apply some flexibility at Results Day in relation to where strong candidates have narrowly missed the grades on certain courses. Universities are likely to practice caution in a new system until patterns of applicant behaviour have been well established.</li> <li>• If there is a limit to the choices students can make, applicants may be risk averse or overly ambitious.</li> </ul>

2.2 Of the two models presented, **the Russell Group considers the PQO system to be the most workable for applicants, schools/colleges, and universities.** This model allows applicants to develop relationships with universities and gauge whether they would feel comfortable studying there. However, implementation of this PQO system would present significant challenges to ensure the system is fair, workable and transparent to all applicants – including how the system will expand student choice, additional entrance tests, international admissions and consistency with the Devolved Administrations. Some of these challenges, our recommended solutions to these, as well as additional considerations, are set out in the sections below.

### 3. Support for schools and colleges, increasing transparency and student choice

- 3.1 **Admissions reform of this nature must be accompanied by a boost in resources for IAG to ensure all schools and colleges are properly supported to deliver careers advice to applicants.** This is especially the case if applications or offers are made outside of term time, otherwise students may be relying solely on family experience or knowledge of higher education (thus driving further inequality). Schools and colleges will also need to support applicants to navigate Clearing choices if first round of applications are not successful, as well as the associated changes to accommodation and student finance after taking up a place.
- 3.2 As well as additional support for schools and colleges, **Government should also consider how a PQA system will drive transparency** beyond removing predicted grades and avoid any unintended consequences that would reduce transparency. For example: the most selective universities and courses are likely to receive more applications from candidates who are qualified to study the course than they have places and will therefore have to further differentiate the candidates to prevent over-subscription. Where additional tests are not available, this process is likely to take the form of a 'gathered field', where universities will wait to see how many applications they get before setting the actual grade threshold for entry onto the course. In a PQO model, this may mean applicants would not have a clear idea of the grades they will need to achieve to secure an offer and place on a course. This is arguably less transparent than the current system, where applicants who receive an offer know that if they achieve those grades, they will have their place confirmed.
- 3.3 A PQA system of either kind could lead to a much greater emphasis on previous attainment. This may disadvantage some groups of students who perform worse at key stage four (e.g., white boys eligible for FSM).<sup>8</sup> If a statement remains part of the system, a PQA system would not prevent a situation where better-supported applicants with access to resources are able to differentiate themselves in a compressed admissions process.
- 3.4 The models do not provide detail on the number of choices that would be available to students during the application process. This will need to be carefully considered to ensure students' options are not unduly limited, as well as ensuring there are not so many as to make the system unmanageable for universities and overwhelming for applicants.

### 4. Support for certain cohorts

- 4.1 The Russell Group notes that the models presented in the consultation focus on the experiences of 18-year-old students obtaining Level 3 qualifications in England, Wales, and Northern Ireland. We suggest that more consideration is given to the potential impacts on mature applicants, as well as those with non-traditional qualifications (including private candidates), and those in Scotland.
- 4.2 We are also concerned that, in a PQA system, the support offered to successful widening participation candidates over the summer – including summer schools and pre-entry support– would be compromised, as universities may not have built the relationships with applicants to ensure this support can take place.
- 4.3 **Due consideration should be given to making the system accessible and equitable to all applicants, including those from under-represented groups, and those with learning difficulties, physical disabilities, and mental health conditions.** There is a particular risk that, if the application process is compressed, and close to the start of university the academic year, disabled applicants may be poorly served as universities will have a condensed amount of time to ensure their needs are met before they commence their studies. Applicants with particularly complex needs may require multiple assessments and adjustments, some of which may require building works or appropriate support to be hired (i.e., a caring team or notetaker). If these cannot be met in a compressed time period, those applicants may be forced to take a gap year or offered a deferred place.
- 4.4 **When designing the new system, Government should be mindful of applicant mental health.** We recognise the current system can raise anxiety levels for some students with its inherent delays,

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<sup>8</sup> DfE, *Key stage 4 performance* (2019)

however there is a danger that a PQA system of any sort could simply replace this with anxiety around a condensed timeline.

- 4.5 We recommend that the DfE works with the higher education, schools, and further education sectors to undertake extensive modelling with the aim of **identifying the impacts of the proposed changes on certain cohorts of applicants.**

## 5. Personal statements

- 5.1 Some Russell Group universities use personal statements to extract contextual information, whereas, others will rely more heavily on other information, such as grade profiles and contextual flags, to make admissions decisions. Personal statements are also occasionally touched upon at interviews with applicants.
- 5.2 We are concerned that in their current form, personal statements are not used enough in the admissions process to warrant the time and effort put in by applicant when writing them, nor that of teachers and advisors in checking the content of the statements. There is also concern that, where they are used, they can highlight disparities between some applicants and their more privileged peers (e.g., privileged students may have had better access to extra-curricular activities, tuition outside of school, and work experience).
- 5.3 However, personal statements can also support applicants in firming up why they want to study a particular course and the process itself helps develop skills which are useful in a higher education setting (e.g., paper writing and critical thinking). Some Russell Group universities have suggested a more structured approach, such as specific questions which applicants could answer instead of a general statement. This may enable students to practice some of these skills in a more focused and less time-consuming way.
- 5.4 **We suggest that the Government considers this further with universities, schools and colleges to ensure universities have the right information in the most suitable format to make admissions decisions.**

## 6. Additional entrance tests

- 6.1 Many Russell Group universities use additional tests to differentiate between candidates looking to study at highly selective or specialist courses, including exams, interviews, and auditions. This is particularly important for Medical and Dentistry courses – where places are regulated by the Government – and courses that are limited in places by the requirements of PSRBs. Tests may also be used where cohort size is necessarily limited by the availability of key facilities or other resources.
- 6.2 A compressed timeline, as outlined in the post-qualification applications model, would prevent universities from accurately and fairly assessing applicants with additional entry testing.
- 6.3 Through a PQO system, universities could continue to test applicants throughout the year – and there is potential for universities to reject unsuccessful candidates (either prior to interview or after) before results day. This could enable applicants to apply again to a different provider, therefore giving them much more choice and flexibility. However, with the absence of predicted grades, universities may need to test a higher volume of students, which could have administrative consequences and implications for students.

## 7. International admissions

- 7.1 **It is important higher education in the UK remains an attractive offer to overseas students.** In 2020, there were around 200,000 applications from international students to universities and colleges in the UK.<sup>9</sup> The Government has set ambitious targets to increase education exports to £35 billion per year and to increase the numbers of international higher education students studying in

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<sup>9</sup> UCAS (2020)

the UK to 600,000 per year through their International Education Strategy.<sup>10</sup> Individual Russell Group members have also developed their own targets around international admissions and fostering intercultural learning on their campuses. We share the view of the DfE that any change to the admissions system should not create an unnecessary barrier to the continued recruitment of highly valued international students.

- 7.2 The international student picture is complex. For example, some international students study in the UK at level 3 and below, and therefore take the same qualifications as their 'home' student peers. Running two parallel systems could cause problems for these international students, but also those from refugee and migrant backgrounds and British students studying overseas.
- 7.3 International applications also require additional processes, such as obtaining visas, undertaking English language tests, and applying for scholarships. These processes often rely on a student receiving a university offer before they can begin. Compressing admissions timelines and delaying university offers until later in the year would make it challenging to complete these processes in time unless they were also reformed.
- 7.4 Around two fifths of students applying from outside the UK will have pending qualifications.<sup>11</sup> These applicants often apply to universities in multiple countries. If they are offered places later in the cycle in the UK, they may be more likely to secure an offer from a competing university in another country. This means that, if a PQA model is implemented, there is a significant risk that UK higher education providers could lose out on international students who are looking to secure their places earlier than the summer.
- 7.5 However, while there would be challenges to including international admissions within a PQA model, our members are concerned about the DfE proposal to remove them from scope of the consultation on admissions reform altogether. **Government should work with the sector to consider the implications of implementing a PQA system on international admissions before committing to any model to avoid unintended consequences on international student recruitment.**

## 8. Consistency with the Devolved Administrations

- 8.1 **When developing a PQA system, Government should work with the Devolved Administrations and stakeholders in England, Scotland, Wales and Northern Ireland, to ensure it functions for institutions across the UK.** As part of its admissions review, DfE should consider specific implications for the Devolved Administrations. For example, an October start date would present challenges to Scottish universities and PQA could negatively impact S6 qualifications, as it may incentivise more students to leave after S5 qualifications. This would restrict the options of these students to study subjects such as medicine, and over time, smaller cohorts of S6 students could impact provision at this level and therefore the choices available to future cohorts.

## 9. Exams and results day

- 9.1 DfE should consult with exam boards to **ensure there is sufficient time and capacity between exams and results day** to grade papers and ensure robust quality assurance and moderation has taken place.
- 9.2 We welcome that the Government has not suggested a significant shift to the start of the academic year. Moving term dates to start in January would present significant financial, academic, and pastoral challenges to our universities. It would also cause visa issues for international students<sup>12</sup>, and the ability of UK higher education to compete with global competitors would be compromised.

## 10. Transition period, costs of implementation, and communication to students

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<sup>10</sup> DfE/DIT, *International Education Strategy: 2021 update* (2021)

<sup>11</sup> UCAS, *Reimagining UK Admissions* (2021)

<sup>12</sup> UKVI requires that International students have valid English language tests for two years at the start of a degree programme. There is a concern that if universities move to a January start this could be hindered.

- 10.1 **The Russell Group recommends that, assuming the detail is agreed in 2021, any new admissions system should be implemented no earlier than the 2025 admissions cycle.** This would help ensure that prospective applicants and their advisors are aware of the new system when considering their Level 2 qualifications, which will be important given a PQA system of either kind could lead to a much greater emphasis on previous attainment.
- 10.2 Sufficient time is also needed to design and deliver the new model, to test new IT systems, and prepare staff in universities, schools, and colleges for significant changes to how admissions processes and advice to applicants are delivered. A new system will cost money to implement – for Government, UCAS, and individual institutions (including schools, colleges, and universities). DfE should work with all stakeholders to anticipate these costs and ensure they can be met for the effective delivery of any new system. Additional financial support from DfE is likely to be required and the Department should factor this into its Spending Review plans.
- 10.3 We also **recommend that the Government work jointly with the sector and UCAS to design and deliver an effective communications strategy** which focuses on explaining the changes to applicants, their parents/carers, schools, colleges and the wider public so that there is an understanding of how the admissions system is different to previous cycles.

## 11. Protecting university autonomy over admissions

- 11.1 The Higher Education and Research Act (2017) protects the autonomy of institutions to determine the criteria for the admission of students and how to apply those criteria.<sup>13</sup> Autonomy in admissions is also critical to delivering for students against the Office for Students objectives around access and participation, as it enables institutions to develop their own contextual admissions policies. **It is important that any changes implemented by Government do not undermine the protections to university autonomy afforded by HERA.**

## 12. Considerations for implementation

- 12.1 As the new system is developed, Government should work with the sector to consider the following:
- (a) How many provider options will applicants be able to select?
  - (b) How will universities make decisions between applications?
  - (c) In a PQO system, when will students be able to apply? Will there be scope to introduce early rejection if the applicant does not have the right subjects to complete the course?
  - (d) Will there be a Clearing-style system in place for applicants who receive no offers of a place? This route will need to support new late applicants, international applicants applying with qualifications, those not receiving any offers, and applicants who change their mind.
  - (e) How will Government ensure that the system works for mature learners, who may already have their grades and need the certainty of their place to guarantee transition?
  - (f) Will there be an adjustment process in place for those who did better than anticipated?
  - (g) Is Government intending to publish a detailed specification of the PQA system, including how much universities will need to pay to implement it?
  - (h) Will the Government work to provide better contextual information on applicants, so universities can more effectively target students from under-represented backgrounds?

**May 2021**

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<sup>13</sup> The Higher Education and Research Act (2017) states that in giving guidance to the OfS, 'the Secretary of State must have regard to the need to protect the institutional autonomy of English higher education providers' and that the guidance 'must not relate to the criteria for the admission of students, or how they are applied'.