



## HELOA PQA - Member Led Response

The HELOA response to the PQA consultation has been collated by the HELOA Partnerships Team on behalf of members. The response aims to represent views provided directly by the wider membership through completion of the PQA questionnaire circulated to members and comments made during PQA webinars for members. Responses to questions within the consultation draw comment and feedback directly from our members. Please note not all questions within the consultation have been responded to with certain questions being prioritised for comment, some lacking sufficient comment from members and others focussing on certain audiences (e.g. schools & colleges).

1. **On a scale of 1-5 (where 1 = highly dissatisfied and 5 = highly satisfied), how satisfied are you with the present admissions system?**

'4'

2. **Would you, in principle, be in favour of changing the current Higher Education admissions system to a form of post-qualification admissions, where students would receive and accept university offers after they have received their A level (or equivalent) grades?**

No

The idea of a PQA system of delivery had some support from our members who responded, however they are overwhelmingly in favour of retaining the current system.

In theory, making offers to students based on actual grades is a good idea and removing the need for predicted grades. However neither model adequately addresses the problem in hand and there are challenges in terms of processing offers, support for WP students with lack of contextual offer making and challenges translating this to the wider UK (e.g. Scottish and Welsh institutions and learners) Our members are also concerned about the shorter time frame for informed decision making and support from students' institutions. There would be a significant impact on staff in schools and colleges due to increased workload over the summer period as well as processes associated with courses which have post offer conditions such as medicals and DBS.

There is concern that both models proposed focus on the grade outcomes as the defining feature of fairness and does not, for instance, take into account that highly competitive programmes and HEIs will still have more applications than places. The proposed models will mean less time for HEIs to make holistic decisions based on factors other than grades achieved e.g. the personal statement, portfolios, interviews etc. as well as also disadvantaging applicants who may have lower achieved grades but have the potential to thrive in higher education.

### **PQA Delivery and Implementation**

There are a variety of ways that a PQA system could be delivered and we are aware of the impact delivery could have across relevant sectors including schools, further education institutions, higher education providers and for applicants, teachers and parents/carers.

Some proponents of PQA have suggested a model in which post-qualification applications and offers take place from August onwards with no changes to Level 3 results dates, but with HE terms starting anytime between November and January. However, we have ruled out specifically considering this as a potential delivery model for the following reasons:

- The considerable gap between the end of school/college and the start of university could pose a challenge to students, particularly for those from disadvantaged backgrounds. There is a risk that these students would have no source of income during this period and then don't progress in to HE.
- Starting the academic year in November would create a very short first term prior to the Christmas break, whilst running an academic year from January to October would be out of sync with most European nations, and many non-European countries, including those from which many international students currently enrol.
- As the exam/result timetable in other northern hemisphere countries usually means that students receive their results in the summer, it could have implications for where international students choose to study.
- This model could involve a considerable loss of income for higher education providers in the transitional year (up to three months' worth of tuition fee and accommodation revenue).

1. If you think these issues should not rule out consideration of the model above, please explain why, providing supporting evidence where possible.

N/A HELOA members agree with points above and this type of model should therefore not be considered.

#### **Model 1: 'post-qualification applications and offers'**

1. Do you think this system would be better than the current system, worse, or no significant improvement? In the text box below, you can refer to the potential costs, adverse effects or implementation challenges of such a reform.

'Worse than the current system'

#### **Please explain**

HELOA members felt that model one has several issues which make it worse than the current system, namely timing, implementation and advice and guidance for prospective students

With regards to timing, concerns were raised around having a condensed period for application and enrolment. "Even with the A Level results moved a few weeks earlier it is hard to see how there can be sufficient time for applicants to decide on their choices". With the proposed model taking place mainly over the summer this creates issues in terms of practical support available for incoming students from their current teachers and advisors.

This small window of time in turn also creates issues in terms of good quality information and advice for applicants from initial application through to transition to HE study. Incoming students may not receive sufficient information around anything from accommodation to course choice to student funding. There is little time for applicants to interact with potential HEIs of choice to find out more before they study at that institution. This particularly disadvantages students with disabilities due to time constraints across key periods of the process.

In terms of implementation it is not only difficult for HEIs in terms of student number planning and practical logistics such as timetables but also challenges from an admissions perspective in terms of delays in interviewing or reviewing portfolio courses and DBS/Occupational health checks.

**2. Please provide your views on Level 3 results day being brought forward to the end of July, in order to provide time for students to apply to Higher Education, with their Level 3 results already known. What effect do you think this could have on students, teachers, schools and colleges and how best could this be facilitated?**

Our members take the view that this would overall have a negative impact on students, teachers and schools and colleges. With the vast majority of information advice and guidance on university choice taking place within term time, the proposed model would most likely require school and college staff to work over the summer period. There would be little time and may cause staff burnout within schools and colleges. The condensed window would also have a negative impact on students with the potential for them to hasty decisions after the end of July and in turn lead to increased dropout rates from HE study.

**3. Please provide your views on the support applicants will need to make their applications to Higher Education under this model, and do you have views on when and how this could be offered? How could students best prepare their application for HE before they receive their Level 3 (A Level and equivalent) result? (Please explain. This can include reference to support for researching and completing applications, deciding which offers to accept, and support put in place before they start HE. It could also refer to ensuring that all applications are treated fairly by higher education providers.)**

Applicants and their influencers would need clear IAG around how to make decisions under pressure and to mitigate stress placed at the end of their school career. Similar support in the current cycle could be in place with altered time-lines. It would be useful for this to be coordinated across the sector where possible so that consistent messaging is being shared with students across the country.

**4. Do you have views on any additional factors that should be considered in relation to potential effects on disadvantaged groups, and students with disabilities, mental health issues or other special needs? Please explain**

Students with disabilities need to be sure that the relevant support is in place to meet their needs before they accept their HE offer, so clear messaging that this research should still take place ahead of applying would need to be made clear in the condensed timeline. Vulnerable students will require personalised support on application/decision making which in this timeline would require prioritisation from careers advisers/teaching staff over summer. Concerns outlined above about prior engagement with their universities, could negatively impact these students disproportionately. Contextual offers support access for students from largely underrepresented groups - how would these fit into this system?

**5. Please provide your views on how additional entry tests, auditions and interviews could be accommodated under this model.**

For providers with a large amount of professional accredited courses, this could be very difficult to accommodate in this proposed cycle. Condensing application and additional entry requirement processing into a few weeks would require additional staffing from universities to support admissions and academic teams. DBS and PVG would need to be consulted as pressures would change on their workforce to turnaround requests.

## **Model 2: 'pre-qualification applications with post-qualification offers and decisions'**

**1. Do you think this system would be better than the current system, worse, or no significant improvement? In the text box below, you can refer to the potential costs, adverse effects or implementation challenges of such a reform.**

Worse than the current system

### **Reasons why**

Overall our members felt that this is preferable to Model 1, however it still has similar issues and does not seem to address many of the problems we already have with the current system.

There would be more time (as there is currently) for students to receive information, advice and guidance about their future options. However there would still be issues in terms of time available and implementation. There will still only be a short window of time following offers made for students to then progress onto their destination of study. There is still the potential for teachers and advisors to be working over the summer holidays to ensure applicants receive sufficient advice after offer making.

There would also still be the challenge of implementation for universities in terms of planning student numbers and having sufficient time to engage with learners before they start on courses, ensuring relevant support is in place, particularly for students from disadvantaged backgrounds.

**2. Please provide your views on the support applicants will need to make their applications to Higher Education under this model, and do you have views on when and how this could be offered?**

Though the applications timing remains the same, there would need to be clear messaging in place to mitigate potential stress increase from not knowing where they stand regarding offers until after results. Motivation will almost certainly be impacted- conditional offers while not concrete, provide something for students to work towards that give an indication of commitment from universities. Without any indicators until summer, an approach would need to be agreed to support students to understand the benefits of making decisions based on achievement on their choices etc.

This messaging would need to be in place straight away for students in sixth form/college to help them and their carers/parents understand the new system and continue to motivate them to achieve their best results.

**3. Do you have views on any additional factors that should be considered in relation to potential effects on disadvantaged groups, and students with disabilities, mental health issues or other special needs?**

A clear outline of support would be needed for this model in terms of how this would work throughout the year. Additional guidance would also be required for parents, carers and other student influencers to ensure applicants are well informed. This support and guidance would need to be prioritised based on need.

Much of the support in place for these students would need to be brought in line with the new timeframe, which as with model one, would only allow a short window to confirm arrangements. Scholarships processes will need to be brought in line with the new timeframe, and likewise will provision of accessible accommodation, study aids, etc. If we go down this route universities need to think carefully about how they ensure offers are honoured for disadvantaged students post-qualification.

**4. Please provide your views on how students could make choices on which courses and institutions to apply for under this model. Your answer could reference the use of ongoing assessment, mock exam grades and prior attainment (e.g. at GCSE).**

There would probably be a need to remove the five choices in applying as the firm/insurance system would not make sense for continued use. Being in a position where you could hold five unconditional offers post qualifications would pressurise the choice and guidance system and make it really challenging for number planning for universities. So potentially three choices would be more viable and encourage students, as is the case with the firm and insurance choice model, to really consider their options rather than scatter-gun approach to choice.

**5. Under this model, would you expect there to be implications for the way in which students apply, which for most undergraduate students is currently through a centralised admissions service (UCAS), rather than directly to higher education providers?**

No

**6. Should there still be limits on how many courses they can apply to?**

Yes

**8. Please provide your views on how additional entry tests, auditions and interviews could be accommodated under this model.**

The PQO seems the much more manageable option out of the two as interviews, auditions, DBS and health checks could potentially be carried out before results day. However there is still the major challenge with regards to timing and ensuring that all relevant information is ready ahead of enrolment deadlines for semester one start.

**9. Under Model 2, offers would be made to applicants after results day, outside of term time. Please provide your views on the support students will need to make their applications to Higher Education under this model, and do you have views on when and how this could be offered?**

This is one of the key issues with this model. Careers support will need to be available and schools/colleges would likely need to arrange drop-ins either on site or virtually to support students with decision making.

Universities will need to consider what support they can provide to schools and colleges to help pupils with these decisions. Unless teachers are expected to forego a significant portion of their summer holiday, this is something that universities (amongst others) will need to be able to support. This has the potential to also create resource challenges within universities to ensure prospective students are receiving high quality information, advice and guidance that they require. If resource doesn't meet need, the government may need to consider national advice centres/or allocated professionals to regions through careers enterprise hubs as an e.g. to support areas of need.

There will be a natural inclination for universities to support their feeder schools and colleges, but there will need to be support for everyone and it should be unbiased. There could be funds made available for careers advisers or practitioners to be in school/college during this time (if teachers are not around) to help pupils navigate this landscape.

If schools remain closed during this period and students have no support from their school, the advice on which offers to accept could be left to parents/guardians and other influencers (who may not have any experience of HE). This may not be sufficient in terms of support provision for these learners.

**1. Please provide your views on how the education sector could support the implementation of a PQA system. This can refer to the roles of schools, further education colleges, higher education providers and charities/representative bodies and can include suggestions around staffing, infrastructure and funding.**

The provision of impartial, consistent information, advice and guidance in schools and colleges must be a fundamental element to any model of PQA. Support from across the education sector in terms of providing this information and advice would be required for a model of PQA to be implemented.

There would need to be sufficient staffing and resources across the education sector to support applicants over the summer period in terms of decision making, support with having relevant systems/measures in place (e.g. support for student switch disabilities and student finance) and incoming transition support for applicants. This would require either staff overtime within relevant educational settings or additional external support which would come at a substantial cost.

**3. Please provide your views on the impact of schools and colleges no longer using predicted grades to guide students in their higher education choices.**

With the models proposed within the consultation there is still the potential for 'predicted grades' to remain in some form. For example, for model 2 students will have made applications based on the grades they think they are going to get and may find themselves in the same situation as they would be under the current system.

Our members feel that applicants will need something that they can use as an indication of their likely performance and may turn to some form of predicted grade to help them decide their best route forward. Further analysis would need to explore the relationship between GCSE grades, mock grades etc. and eventual grades.

In theory, making applications and offers to students based on actual grades is a good idea and removing the need for predicted grades. However, the model of post-qualification offers is more practical, giving applicants access to the same support in school/college that they already have to navigate the process, rather than pushing this to the summer after term has ended, which would have implication for advice provided to them and condense the whole process from application to enrolment to a much shorter period of time.

There are also concerns raised regarding widening participation admissions initiatives such as contextual offers. Where does contextual admissions sit within either of these models? How practical are they without predicted grades to implement?

## **6. Please provide any additional thoughts, ideas or feedback on the policy proposals outlined in this document.**

The majority of HELOA members who responded to the consultation are not in favour of either of the models proposed. Whilst there is potential support for a PQA system, the two models do not provide an adequate solution. This is mainly due to issues around time for sufficient decision making and information advice and guidance for incoming students. Provision of impartial, consistent information and guidance for prospective students must be a fundamental element of any model of PQA delivery

Both models are flawed and are unlikely to address some of the issues they are looking to improve (such as enabling more students from disadvantaged backgrounds to apply to more selective institutions or improving transparency about decision-making). Model two will provide students with more time to research their university options and is, therefore, slightly better than model one, however neither model is likely to generate sufficiently substantive positive change to justify the cost and upheaval of changing the current system.

There are real concerns around the impact of the models proposed on students from disadvantaged backgrounds. The current system allows universities to be flexible to support disadvantaged students to progress.

There are also issues in terms of the impact on devolved administrations and more broadly international applicants. Anything that disrupts the flow of students into the UK system, particularly at this time when our economy is moving into recovery mode, has to be avoided or properly accounted for. Neither proposal presented demonstrated how this would work in practice for those students.

### **Public Sector Equality Duty (PSED) Questions**

#### **1. Please provide any representations and/or evidence on the potential impact of our proposals on people with protected characteristics for the purposes of the Public Sector Equality Duty (Equality Act 2010).**

There are real concerns amongst our members on the potential negative impact of the proposed models on people with protected characteristics and there was particular reference to disadvantaged students with widening participation characteristics.

Students with disabilities, SEN and mental health needs will be more vulnerable navigating the system and this will be compounded by delay to post-results, so a support plan of information, advice and guidance will need to be put in place for all students, but personalised based on individual need.

For students with disabilities there is the real challenge with either of the proposed models in ensuring sufficient support is in place ahead of semester one term starting. The lack of confirmation on course, institution and support in place has the potential to create significant amounts of stress and anxiety for those with protected characteristics. There is also the challenge around providing sufficient information advice and guidance for learners with disabilities in such short time frames after offer/application made. This is the case for both models.

Any model implementation must aim to ensure that it is not disadvantageous to students irrespective of their background or circumstances. If it is deemed that models have the potential to do so, relevant measures will need to be put in place to provide additional support to affected applicants.