

Sutton Trust response to the government consultation on Post- Qualification Admissions reform

Initial questions

1. On a scale of 1-5 (where 1 = highly dissatisfied and 5 = highly satisfied), how satisfied are you with the present admissions system? 2
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?
Yes/No

Please state the reason for your response and if it relates to a specific delivery model.

Whilst there have been substantial improvements in university participation among students from disadvantaged backgrounds in recent years, the gap between low-income students and their better-off peers remains significant, particularly at the most selective universities.

The current university admissions process requires young people to make potentially life-changing decisions far in advance of university entry, based on predicted grades. Previous Sutton Trust research with UCL revealed that the vast majority of these grades are incorrect, with 9% of students underpredicted and 75% overpredicted. Underprediction particularly impacts high achieving disadvantaged students, and up to 1,000 such students are underpredicted each year (Sutton Trust, 2017, Rules of the Game). These students may then not apply to selective universities on the basis that their predicted grades are lower than published entry requirements. Even if they do apply, they may not be accepted by institutions who think they will not get the grades needed to attend. These dynamics may be contributing to the problem of 'undermatch', where students from lower-income backgrounds are more likely to attend less selective universities and courses than their exam results would qualify them for. While a large proportion of disadvantaged students are also over-predicted each year, this may not be in their best interests either, if they end up on a course which does not suit them. It would be to everyone's benefit to rely on achieved grades rather than unreliable predictions.

The current system does not meet the Schwartz principles of fair admissions of transparency and minimising barriers. As outlined in the Schwartz review of fair admissions in 2004, transparency is a key principle of a fair admissions system. However, under the current system, the grades needed to be accepted onto a programme of study are not clear. There are frequently differences between the published entry requirements for courses and the qualifications which end up being accepted by institutions. UCAS highlighted in 2019 that 49% of applicants with three A Levels were accepted below the published criteria (UCAS, 2021, Reimagining UK Admissions). This may lead to some students not applying to courses or institutions that they believe to be out of reach based on their predicted grades, but which in they may have been accepted onto had they applied.

The current system also allows for the damaging practice of unconditional offers, which the consultation document recognises can leave students unprepared for university, more likely to miss their predicted grades and more likely to drop out of their course. Unconditional offers may put pressure on students to make poor and rushed decisions, which is a particular risk for disadvantaged students who are more likely to receive such offers, but less likely to have access to help and support when navigating the system.

This system not only potentially disadvantages many talented young people from lower socio-economic backgrounds, but also makes the UK an outlier internationally. The UK is the only major country to base its university admissions system on a system of predicted grades. In a new analysis of 31 OECD countries outside the UK, research for the Sutton Trust by Professor Graeme Atherton found that 20 have post qualifications offers (PQO) systems and 11 have post qualifications applications (PQA) systems (this brief can be accessed here: suttontrust.com/our-research/university-admissions-the-international-picture-pqa).

On balance the Sutton Trust favours a post-qualification applications model so that students can apply to university with their grades in hand. However, we recognise that there are some significant challenges to this model, including changing timetables and introducing summer support, which need careful consideration before implementation and will require substantial changes in the information, advice and guidance provided to students. Nonetheless, if introduced with appropriate timings and significant support for students, we believe that this model would be preferable to PQO, which would not eliminate the use of predicted grades when students are making choices and may therefore still be a brake on aspirations.

However, we firmly believe that moving to a post-qualification admissions system is not a silver bullet for improving access. A change to a PQA system must come as part of a broader strategy from the government and the sector to widen access, including wider and more ambitious use of contextual offers and a continued focus on outreach and building a diverse pipeline of applicants.

If a change to the admissions system as a whole is not possible, there are some reforms that could be made to improve the current system for disadvantaged groups. This could include explicitly encouraging aspirational or 'stretch' options in the application form (potentially by increasing the number of selections a student can make, or other 'nudges' in the form), and reserved places in the present adjustment period for those from underrepresented backgrounds who perform above expectations in their exams.

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.

The Trust agrees that a move to post-qualification applications which involves a significant delay to higher education start times would be challenging. As UCAS highlight in their recent report, *Reimagining UK Admissions*, a January start would place the UK at a disadvantage in the international student market, and, if all four nations do not adopt this change, could fragment the UK education system.

Model 1: 'post-qualification applications and offers'

Questions for Model 1

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.

Better than the current system

Worse than the current system

No significant improvement

The Trust supports a move to a post-qualification applications system, provided that it is introduced alongside substantial and high-quality information, advice and guidance for students. Predicted grades are highly unreliable, and a system such as Model 1 where applications are made after grades would formally remove them from the system. Under Model 1, predicted grades may still be used by some schools in informal guidance to students, but they would not be a formal part of the admissions process, and students would be able to make informed decisions about their next steps based on their actual grades. This could increase applications by those from disadvantaged backgrounds to more selective universities. Such a system would also help with transparency and simplifying the system for all young people.

Post-qualification applications also provide greater choice to students, keeping a wider range of options on the table for young people for longer and allowing them to make informed decisions once they know all of the choices available to them. It also has the benefit of removing unconditional offers from the system, which serve to put pressure on students to accept offers which may not be optimal for them.

Previous Sutton Trust research found that a move to post-qualification applications is supported by young people: two thirds of last year's university entrants (66%) were in favour of removing predicted grades from university admissions and making decisions based on actual results (Sutton Trust, 2020, PQA: Reforming University Admissions). A quarter of students also said would have made different decisions about the universities they applied to if they'd had their grades before applying.

However, moving to this system presents some significant challenges around timings and the support that will be required for students over the summer. More detailed information on this can be found in our response to questions 2 and 3.

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?

Ideally, the Trust would like to see results day take place while students are still in school. UCL have proposed an alternative version of Model 1 in which the exam and marking process could be condensed so that students could make their applications during term-time, after exams (detail on this is available at: economicsobservatory.com/should-students-apply-to-university-after-theyve-got-their-exam-results). Under this system, exams would take place in early May with a compressed schedule, running over a three- to four-week period. Students would receive their grades towards the end of term and can make their applications with support from teachers during term time, seven to eight weeks after the compressed exam schedule ends. The condensing of the exam timetable would be coupled with a condensing of the marking period. With this, exam boards would need to invest in more markers for quality assurance and could also make use of some technological improvements. This timing should be explored by the government as it provides a model of PQA under which less substantial support would be needed over the summer and which may be more likely deliver the benefits outlined above. Such a system where support is offered during term-time may also help to ensure that disadvantaged

young people who are most in need of support attend and engage with the advice and guidance available to them.

In comparison to countries across the OECD, as well as being the only pre-qualification offer system, students in England apply to higher education much earlier and are generally given more time to accept an offer after it is made.

Other options for timings could also be considered in a PQA system. A recent report by the University and College Union (UCU) suggests that it would be feasible to deliver the academic year beginning with an induction week that starts in late October and finishes mid- June (University and College Union, 2021, Post-qualification Applications: How we can make it work). However this would require substantial support for applications during a period when schools are closed.

The impact of the timings of Model 1 on the nations must also be considered. Given the differences in the timings of the academic year in Scotland, as well as the structure of post-16 schooling, Model 1 could present particular challenges and may require the Scottish school year to alter radically. Careful consideration should be given to ensure that students from all nations are able to study across the UK without barriers. More detail on this can be found in our response to question 8.

- 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? 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.**

A challenge of a post-qualification applications system is the necessary change in the timetable and the resulting need for additional support over the summer (especially if results come at the end of July, as proposed, above, rather than earlier, as proposed by UCL). The Trust's preference would be for results day and applications to take place during term-time, so that students are able to make their applications in schools, supported by teachers. This is particularly important for young people with less access to support, 'knowhow' and connections outside of school.

If results day does not happen during term-time and application period is moved to the summer, it is vital that sufficient supports are provided to students from all backgrounds to make life-changing decisions on their future. Without this, the move to post-qualification applications may have negative unintended consequences for those from disadvantaged backgrounds, who may be less able to access support (for example through their families or paid tutors) during this time.

A re-structure of the information, advice and guidance provided to students will be necessary in a move to a post-qualification application system. It is vital that all students receive personalised support with researching institutions and courses during the school term. Applications could be structured in such a way which allows students to make some provisional choices during term-time, so decisions do not need to be made solely over the summer. During term time, teachers could encourage students to pick a few key provisional options – a combination of 'stretch' options if they perform better than expected, some which fit their grade expectations and some with a lower grade requirement if they do not perform as well as they expect to.

A possible, more formal, option to consider could be for students to submit 'expressions of interest' to universities they are considering applying to during term-time, an option proposed by the UCU. This could ensure that students fill out their UCAS form with all the necessary information at a time when they have access to in-school support, and would help institutions to understand potential course demand. These choices would not be final and could be changed once students receive their grades, and if students were able to make more expressions of interest than the number of choices they are allowed in the current system, this could encourage aspiration.

Expressions of interest could also help with the concern that students may lose the connection they currently build with universities over the summer, such as through attending offer-holder days. By introducing expressions of interest, students could attend events and build relationships with institutions that they have submitted an expression of interest to. If an expression of interest phase was not introduced as part of a PQA system, universities could still change some of their practices to build relationships with potential applicants. It is vital that students have multiple opportunities to interact with institutions they are considering applying to.

However, even with a change to the structure of choosing institutions, substantial summer support will still be necessary, especially if results day falls outside of term time. Teacher workload is a key consideration here and we understand the government's preference to not change conditions for teachers, particularly given the challenges that those in the teaching profession have faced in the past year. However, a skilled workforce is needed to help students apply for university over the summer period, and teachers are best placed to provide this support. If applications fall outside of term-time, a 'choices' week could be introduced over summer for students to go into schools and work with their teachers on applications and accepting offers. In a 'choices week', not all teachers would be required to be in for the entire week. It is vital that teachers are paid overtime for any additional work they undertake over the summer. As well as teachers, student mentors could be introduced, where current students would be able to speak with prospective students to help with decision-making. Careful consideration must be given here on how to ensure that disadvantaged students who may be most in need of support attend and engage with these sessions.

The UK could also learn from some of the other innovations in advice and guidance support that we see across the world. Innovations like the Study Choice Check in the Netherlands could have a role to play in an English PQA system. In the Netherlands, every student applying to higher education must undergo a "check" to evaluate their fit with their selected study programme. This helps students get a better understanding of their own interests and abilities and to understand career opportunities associated with it. The government should consider options such as this which would provide more systematic support for students and help them to make applications after they have received results.

Other options for the timing of applications, such as the version of Model 1 proposed by UCL where students make their applications during term-time, could also help to address some of the support needed over the summer.

In terms of providers treating students fairly, a 'code of practice' as set out in Universities UK's Fair Admissions Review could be introduced to ensure that all institutions are acting appropriately and consistently.

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?

As previously mentioned, predicted grades are unreliable and high-attaining, disadvantaged students are at particular risk of being underpredicted. The current system also lacks transparency and a move to Model 1 could help students navigate to the system and understand processes better (provided that a move to PQA is accompanied by a significant restructure in support, advice and guidance which is workable).

Post-qualification applications also present challenges and opportunities for contextual admissions. Changes to the university timetable may give universities less time to consider contextual information as part of a students' application. It is important that universities ensure they still consider contextual factors when giving offers, as this is a vital way to widen participation for underrepresented groups. However, a key benefit of PQA is that an increase in transparency on entry requirements could mean contextual offers could also become more transparent, with universities publishing more details on their contextual offers for students. Such changes would likely require a transparency policy to be introduced alongside any introduction of a new admissions system, and would help ensure that reform had a positive impact on fair access.

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

Moving the admissions timetable presents a challenge in terms of courses which require additional tests and interviews. The UCU highlight several options available for HEIs wishing to deliver interviews and/or auditions in a post-qualifications applications system. One such option would be to deliver interviews and auditions for all students who express an interest in an institution before results are announced. Careful thought would need to be given to how to accommodate students who have not initially expressed interest in a course, but whose actual grades lead them to make applications. It is imperative that, under such a system, these students would be treated equally as their peers and considered as a 'gathered field' of applicants, rather than as a two tier process.

Institutions could also consider their use of interviews and whether they are necessary for fair admissions. However, we do recognise that interviews can be useful for some courses, allowing institutions to get a more rounded view of a candidate, which can help universities to contextualise offers. Where this is the case, it's important that if universities do decide they cannot use interviews under a PQA system, that they should look at other ways to take into account a student's wider context, including background factors such as free school meal eligibility and school attended.

There are dangers here in universities replacing predicted grades with new tests or other additional procedures which could have negative impacts on access. A code of practice is vital here to ensure consistency and minimise unintended consequences of reform.

6. 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?

Yes No Not sure

If yes, what implications and why?

Under this model, students should apply through UCAS, and this would be the Trust's strong preference. Moving to a system where students apply directly to higher education providers would add an extra layer of complexity to the system. UCAS provides a clear, central portal for students to use. UCAS also collects vital data which is needed to monitor gaps in access.

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

Yes No Not sure

If yes, what limits and why?

The Trust is supportive of students having more choices under a PQA system to ensure that all young people are able to consider a broad range of options. However we do recognise that universities will have less time for processing applications and this will need consideration.

If there was an expressions of interest phase, then students should be able to choose a larger number of options than currently in order to encourage aspiration and consider a broad range of options.

8. If you are a higher education provider, we would be interested in your views on how quickly applications could be processed under this model.

N/A

9. Please provide your views on any additional implications under this model for students, higher education providers and courses not already covered above.

The introduction of a post-qualification application system in England will have impacts across the whole of the UK which must be considered. All UK students must continue to be able to seamlessly apply to and attend institutions from all four nations.

Many of the arguments in favour of PQA do not apply to the Scottish system: neither predicted grades nor conditional unconditional offers are used widely, and the system is far more transparent, with minimum entry requirements for each course published. It is therefore unlikely that a move to PQA in Scotland would be of benefit. However, a change to a PQA system in England may have considerable impacts on the Scottish system.

Given the differences in the academic year in Scotland, Model 1 could present particular challenges and may require the Scottish school year to alter radically. There are also significant concerns about how a PQA system would interact with the Scottish exam system of Highers and Advanced Highers.

Scottish schools report that many S6 UCAS applicants will have achieved all or almost all of the qualifications needed before they complete their UCAS application. There are concerns around condensing the application window and the resulting change in support needed, which may be an unnecessary change if students already have their qualifications. Concerns have been expressed that for Scottish students in rural and island communities, this may mean considering a significant move in a short space of time.

Concerns have also been raised about the impact of students in colleges studying for HNC and HND qualifications, who apply to university during their year(s) at college. It is vital that any changes to the admissions system carefully considers these issues and involves extensive consultation with the education sector across all nations.

Model 2: ‘pre-qualification applications with post-qualification offers and decisions’

Questions for Model 2

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.

Better than the current system

Worse than the current system

No significant improvement

A model of post-qualification offers (PQO) like Model 2 would likely be an improvement on the current system in that it would improve transparency of higher education admissions by removing the ‘two stage’ process of offers and acceptances where grade thresholds can differ. It would remove the use of unreliable predicted grades by universities in their decision making, and eliminate the use of unconditional offers, without needing to overhaul the timeframe for exams and results.

However, this approach is also not without its downsides. While universities would no longer make offers based on predicted grades, Model 2 would not formally eliminate them from the process, as applicants would still make their choices informed by predicted grades. The unreliability of predicted grades is one of the key motivations to move to post-qualification admissions, so while PQO may be a less challenging model to implement, it does not provide the opportunity to formally eliminate predicted grades from the system. It is unlikely to overcome the issue of lower-income students ‘under selling’ themselves in which courses and universities they apply to – under confident students may still not apply to highly competitive universities with interview for example, and by time they know their actual grades, this opportunity will have been missed.

If Model 2 were implemented, it would need to be accompanied with other measures which could encourage higher aspirations by students when making their choices. For example, using ‘nudges’ in the application form to explicitly encourage at least one aspirational or ‘stretch’ option in the application form (for example by adding a separately labelled extra choice to the five that can currently be made).

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? This can include reference to support for researching and completing applications. It could also refer to ensuring that all applications are treated fairly by higher education providers.

The support that students would need to make their applications under Model 2 would not substantially differ from the current system if applications are made at the same time, as students will receive support during term-time. However, even without a significant change to application timetables, the Trust would like to see real focus on high-quality IAG throughout education to ensure that all young people can make informed decisions about their future choices, particularly as the problem of predicted grades would still remain.

Under Model 2, students would require more substantial support over the summer when making decisions about which offer to accept. More detail on this can be found in our response to question 4.

In terms of providers treating students fairly, as with Model 1, a ‘code of practice’ as set out in Universities UK Fair Admissions Review, could be introduced to ensure that autonomous institutions are acting appropriately and consistently, and do not introduce new procedures that cause an extra burden on applicants.

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?

As with Model 1, PQO provides an opportunity for more transparency around widening participation measures like contextual admissions and what grades students from different backgrounds need to achieve. If PQO were to be introduced, it should form just one part of a wider strategy to widen access to university for disadvantaged students. Contextual admissions are a vital part of narrowing the access gap to university and universities should be making greater and more ambitious use of these, with clear information provided to students on whether they might be able to benefit from a contextual offer.

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).

Ideally, prior attainment, mocks and other assessments should be used to build up a holistic picture of how a student might achieve. These assessments can give students an idea of the grades they might achieve in each subject and they can use these as the basis of deciding where to apply, along with personalised support and guidance on programmes of study and the careers and outcomes associated with them. However, a key drawback of post-qualification offers is that students will still be using their predicted grades to make choices about which universities to apply to, which may result in some students who are underpredicted applying to less selective institutions than their credentials would allow.

During term-time, teachers could encourage students to pick several options for applications – a stretch option if they perform better than expected, some which fit their expectations and one with a lower grade requirement if they do not perform as well as they expect to. The application form should facilitate and encourage this type of approach. This could help to ease some of the burden over the summer period as these provisional decisions will have already been made.

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?

Yes No Not sure

If yes, what implications and why?

As with Model 1, student should still be able to apply through UCAS under a PQO system. Moving to a system where students apply directly to higher education providers would add an extra layer of complexity to the system. UCAS provides a clear and easy central portal for students to use, and UCAS also collect data which is required to monitor gaps in access.

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

Yes No Not sure

If yes, what limits and why?

As students will still need to apply with their predicted grades, some limits to course applications should still be in place. However these choices could be re-structured so that students are encouraged to apply for a range of options – some with grade requirements lower than their predictions, some around what they would expect to receive and some ‘stretch’ options if they receive higher grades than they had expected. Consideration should be given to expanding the number of choices in order to better facilitate this approach.

- 7. If you are a higher education provider, we would be interested in your views of how quickly applications could be processed under this model.**

N/A

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

Under Model 2, entry tests, auditions and interviews could still take place over the winter for applicants. Institutions can then use this information along with the application from the student and the grades they achieved to make offers.

While protecting existing entry requirements appropriate to certain types of courses is important, preventing universities adding new requirements to replace the role of predicted grades would also be vital. The pressures on universities to secure students that has led to the explosion of unconditional offers would remain, and a code of practice would be necessary to prevent universities circumventing the spirit of the new admissions system.

- 9. 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?**

Substantial summer support would need to be introduced under Model 2, as students will need support with choosing which offer to accept in the summer. As with Model 1, teachers are best placed to offer this. One option would be the introduction of 2-3 days in the summer after students have received offers in which students could go into school to talk through their offers and choices. The model of this would need careful consideration to ensure that the most disadvantaged attend these sessions.

As with Model 1, another concern is that students may lose the connection they build with universities over the summer, for example through attending offer-holder days. Universities would need to change some of their practices to build these relationships with applicants and ensure that all students who have applied to the institution have multiple opportunities to interact with universities over the summer.

- 10. Please provide your views on any additional implications under this model for students, higher education providers and courses not already covered above.**

N/A

Further Questions

- 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.**

A move to a post-qualification admissions system will be a significant change and will require support from across the education sector. Under both models, teaching and support staff will be required to be in schools during the summer to help with applications and/or decisions, and will need to be paid for this overtime. Student mentors could also provide support for applicants over the summer.

Universities and other organisations have had to develop and make use of digital innovations for outreach and widening access over the past two academic years. Some of this learning could be harnessed to provide interactions between students and institutions, and to provide additional support for students.

Further external support for effective information, advice and guidance could be developed to help with school capacity, similar to the Uni Connect programme.

A change to admissions must be accompanied by clear information to students on the changes and how the new system will operate. Widening participation charities such as the Sutton Trust could provide further information on the admissions process during summer schools to ensure that disadvantaged pupils are clear on the new system and how to choose the institutions to apply to and how to make decisions once offers have been made.

- 2. Should personal statements be removed from the application process?**

Yes

No

Not sure

Please provide a reason for your answer.

The personal statement in its current form may act as barrier to entry into higher education, and the Sutton Trust has previously called for a review of the use of the statement. It is important that personal statements are considered by universities as just one part of all of the various aspects of a student's application. Personal statements are best used by universities to understand the context in which a young person has achieved. If they are primarily used to evaluate the nature of a young person's experiences and development beyond the classroom, this is highly dependent on the level of support received by the applicant in writing it, as well as access to the type of experiences commonly discussed in such statements. Institutions and tutors should strongly keep in mind the varying levels of support provided to students in writing these statements. Evidence from the US on 'holistic admissions' shows that the success of this approach to admissions in widening participation is dependent on how this is framed within institutions, and whether it is about appreciating the 'whole context' of the applicant, or focused on the 'whole person', which can in effect merely reward those who have the best access to extra-curricular development opportunities and can frame these opportunities in the 'right' way.

The Trust would like to see a full review of the use and format of the personal statement, looking at whether it is beneficial to the application process, and considering if the format could be improved to ensure it is a fair indicator of all applicants' potential. We'd like to see clearer guidance to all applicants as to what a personal statement should contain and how to structure the essay. One possible way to improve the format would be to divide the statement into sections and clearly set out

what is required in each section. Universities should be more transparent about how specific subject departments use and evaluate personal statements, and should share this information widely with applicants, schools and teachers. As it stands, current use of the personal statement is an inconsistent and untransparent feature of the admissions system.

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.

Removing predicted grades would have major benefits in terms of fairness and transparency of the admissions system. The Schwartz Review into fair admissions deemed predicted grades to be unfair and could prevent students with lower self-confidence from applying for courses with higher entry requirements. Removing predicted grades could help to meet the five principles set out in the Schwartz review: transparency, considering grades in context, reliable (and valid) assessment methods, an accessible application process and appropriate institutional structures and professional processes.

Removing predicted grades formally from the system, while not a silver bullet for university access, could help to level the playing field for students from less advantaged backgrounds and improve informed decision making, while also bringing the UK in line with common practices used internationally. Recent Sutton Trust polling highlighted that while most of last year's applicants would have applied to the same universities knowing their final grades (73%), a considerable proportion, about 1 in 4, would have made different decisions, with 13% instead wanting to have applied to more selective universities, and 11% to less selective institutions (Sutton Trust, 2020, PQA: Reforming University Admissions). It should be noted however that 2020 was an unusual year, with centre assessed grades substantially higher than in a normal year. Just over 1 in 5 of those who achieved final grades higher than their predicted grades said they would have applied to higher tariff institutions if they knew their final grades before applying, while 29% who performed worse than their predictions reported they would have applied for institutions with lower entry requirements. Removing predicted grades from the system provides a level of certainty for students that they are making the best decisions for them.

However, as highlighted throughout our response to this consultation, it is vital that under a system where predicted grades are no longer used, the grades received by students are contextualised when universities are making admissions decisions.

4. International students are not currently in scope of proposed PQA for a number of reasons (international exams work to different timetables outside the UK, many international students do not apply for UK courses via UCAS and international students require additional time ahead of term starts to apply for/be granted visas etc). Do respondents agree this is the correct approach given circumstances? If not, what are the key reasons as to why international applicants should be included in scope?

The introduction of any post qualification admissions system needs to include serious consideration of any impact on international students and ensure that it does not act as a barrier. The UK needs to remain competitive and attractive to international students and a change to the admissions system must not jeopardise that. It is also vital that UK and international students are treated fairly and any differences in the way that international students are admitted should not impact on the ability of UK students to gain places.

5. Please provide any views that you have on treating applications from students who do not currently apply through UCAS, and in particular whether a move to a PQA system would imply changes in how applications from non-UCAS applicants are considered

Mature and part-time study is an important route to social mobility, and the impact of changing the admissions system on such students must be carefully considered. There is a risk that delaying the point at which mature and part-time students know they have been accepted may cause issues for those who have other caring and work responsibilities and need to have a clear idea of their future

plans at an early stage. To address this, institutions could be allowed to process the applications of those who already have their qualifications early.

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

N/A

Public sector equality duty

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).