**Consultation**

# Office for Students

# Consultation on the higher education admissions system in England

This consultation runs from **27 February 2020**.
The deadline is to be confirmed.

The Office for Students is the independent regulator for higher education in England. We aim to ensure that every student, whatever their background, has a fulfilling experience of higher education that enriches their lives and careers.

**Our four regulatory objectives**

All students, from all backgrounds, and with the ability and desire to undertake higher education:

- are supported to access, succeed in, and progress from, higher education

- receive a high quality academic experience, and their interests are protected while they study or in the event of provider, campus or course closure

- are able to progress into employment or further study, and their qualifications hold their value over time

- receive value for money.

# Consultation on the higher education admissions system in England

The Office for Students is reviewing the admissions system in English higher education. We would like to hear your views on the current system and on proposed future options.

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| Timing of consultation | Start: **27 February 2020**<br><br>End: **To be confirmed** |
| Who should respond? | Anyone with an interest in admissions in English higher education. |
| How to respond | Please respond by using the online surveys:<br><br>• **Higher education providers:** https://survey.officeforstudents.org.uk/s/admissions-review-providers/<br>• **Schools and further education colleges:** https://survey.officeforstudents.org.uk/s/admissions-review-schools-colleges/<br>• **Applicants, students and student groups:** https://survey.officeforstudents.org.uk/s/admissions-review-students/<br>• **All other respondents:** https://survey.officeforstudents.org.uk/s/admissions-review-other-groups/<br><br>**Or by email:** admissionsreview@officeforstudents.org.uk |
| Enquiries | Email: admissionsreview@officeforstudents.org.uk<br><br>Alternatively, call our public enquiry line on 0117 931 7317. |

If you require this document in an **alternative format**, or need assistance with the online form, please contact info@officeforstudents.org.uk/.

Please note: **this email address should not be used for submitting your consultation response.**

# Contents

**Annex D: List of consultation questions** – this is a separate document, available at www.officeforstudents.org.uk/publications/consultation-on-the-higher-education-admissions-system-in-england/

# About this consultation

1. The Office for Students (OfS) is reviewing the admissions system in higher education in England. This consultation forms part of our review.

2. This consultation sets out and invites responses to:

   - A proposed set of principles for reliable, fair and inclusive admissions with the overarching principle that **all students, whatever their background, should be able to choose between and select courses and providers matched to their needs, achievements and potential** (see Table 1)**.**

   - Ten issues across each stage of an applicant's experience of the admissions process that we believe warrant discussion. These contribute to the overarching issue that the **admissions process does not always work in the interests of students, who may not always choose between and select the providers and courses best suited to them.** The ten underlying issues are summarised in Table 2. Respondents are also invited to identify any further issues which they consider to be relevant to our review.

   - Three options (see Future options) that are currently being discussed in relation to the future direction of the **undergraduate full-time** admissions system: maintaining the existing system with reforms; post-qualifications offers and post-qualifications applications, together with any other approaches that stakeholders think should be considered, including in relation to **the wider English higher education admissions system**.

3. In each section of the consultation, we have described the issues or options, identified relevant evidence and set out some of the questions that the evidence prompts. Some of the questions are addressed to a particular group of respondents, for example to applicants, students or student groups, or to staff working in schools or colleges. However, respondents are welcome to respond to any of the questions if they wish. Many of the questions addressed to students or student groups ask them to share students' experiences with us. Some of the questions addressed to staff working in providers ask for information about the provider's policy or practice, others may elicit more personal views of the respondent.

4. We recognise that many providers provide a wide range of courses at undergraduate and postgraduate level, part-time and full-time, through different patterns of delivery and that admissions practices may vary across that provision, including across different departments. In responding to this consultation, providers may find it helpful to highlight where issues are relevant to particular parts of their provision only and/or where different admissions practices apply across their provision.

5. The questions that we have set out are not exhaustive: respondents are invited to offer additional responses.

6. We have also identified some issues that are explicitly out of scope for this review and have explained the reasons for this in each case.

7. The consultation questions are listed in full in **Annex D** (available as a separate document alongside this consultation document).[1]

> **Please note:** We have provided a list of technical and other terms used in this consultation at **Annex C**.

## Who should respond to this consultation?

8. We welcome responses from anyone with an interest in admissions in higher education. We are interested in hearing from **students (past, present and future)**, **parents and carers**, **professional and academic staff** and **leaders at higher education providers** that engage with higher education admissions systems and processes. We would also like to hear from **schools and further education colleges, employers, sector bodies, third sector organisations** and others with an interest in the admissions system, student choice and equality of opportunity in higher education. Although this review is focused on the English admissions system, we would also like to hear from stakeholders with experience of the admissions system in Scotland, Wales and Northern Ireland.

## How to respond

> The deadline for this consultation is to be confirmed.
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> Please submit your response by:
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> - **Completing an online form available at:**
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> - Higher education providers: https://survey.officeforstudents.org.uk/s/admissions-review-providers/
>
> - Schools and further education colleges: https://survey.officeforstudents.org.uk/s/admissions-review-schools-colleges/
>
> - Applicants, students and student groups: https://survey.officeforstudents.org.uk/s/admissions-review-students/
>
> - Other respondents: https://survey.officeforstudents.org.uk/s/admissions-review-other-groups/
>
> - **Email:** admissionsreview@officeforstudents.org.uk
>
> - **Writing to us at**: Nicholson House, Lime Kiln Close, Stoke Gifford, Bristol BS34 8SR.

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[1] See www.officeforstudents.org.uk/publications/consultation-on-the-higher-education-admissions-system-in-england/

# Consultation principles

9.   We are running this consultation in accordance with the government's consultation principles.[2]

# Public Sector Equality Duty

10.  At the OfS we are committed to equality and diversity in everything we do. We have a legal obligation to have due regard to the Public Sector Equality Duty (PSED).

11.  Central to this consultation is the aim to have a positive impact on all applicants. Through this consultation process, we will seek to understand how issues in the higher education admissions system in England may affect applicants with protected characteristics and how those issues might be addressed.

# How we will treat your response

12.  The OfS will summarise and/or publish the responses to this consultation on the OfS's website. This may include a list of the providers and organisations that respond. We are not collecting any identifiable personal data as part of this consultation. The online consultation response forms do not collect any identifiable personal data. Please avoid including any personal data that can be traced back to you, for example your name or email address, in your response. If you send your response to us by email or by post, we will anonymise your response to remove any identifiable personal data. We will permanently and securely delete any identifiable personal data that you send to us.

13.  The OfS will process any personal data received as part of our wider admissions review in accordance with all applicable data protection laws (see our privacy policy).[3]

14.  Information (including personal data) may need to be disclosed in accordance with UK legislation (such as the Freedom of Information Act 2000, Data Protection Act 2018 and Environmental Information Regulations 2004). We may also need to disclose or publish information that you provide in the performance of our functions, or disclose it to other organisations for the purposes of their functions.

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[2] See https://www.gov.uk/government/publications/consultation-principles-guidance.

[3] Available at www.officeforstudents.org.uk/ofs-privacy/.

# Next steps

15. We will publish a report on our analysis of the responses to this consultation, and the evidence gathered through the broader work of the admissions review, in **autumn 2020**. This will include our views about any need for future changes. We will make judgements about where the OfS might focus further attention by considering our prioritisation framework and our general duties, and about where actions might fall to parties other than the OfS. We will be guided in this process by the student interest. [4]

16. Those organisations that might need to change their approach in order to implement any changes will be closely involved in formulating the plans needed to deliver these. Many of the possible changes, especially more radical changes, would require extensive collaboration across different parts of our education system. That is why this review is seeking to open discussion rather than to narrow focus to particular options at this stage.

17. Any significant changes to the higher education admissions system in England will require collaboration and partnership with stakeholders from across the UK's education system and would be subject to further consultation with those stakeholders.

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[4] (1) See the OfS's prioritisation framework https://www.officeforstudents.org.uk/media/355936f6-5721-4460-96ad-57797475039e/bd-2019-march-51-prioritisation-framework.pdf [PDF]

(2) The OfS's general duties are set out in section 2 of the Higher Education and Research Act 2017 (HERA). See http://www.legislation.gov.uk/ukpga/2017/29/contents/enacted

# Introduction

19. This consultation forms part of a **wider review** by the OfS of the admissions system in English higher education. As the independent regulator of higher education in England, we wish to examine the extent to which the current admissions system is working in the interests of students. This is because our first regulatory objective is to ensure that all students, from all backgrounds with the ability and desire to undertake higher education are supported to access, succeed in, and progress from, higher education.

20. Although there have been significant changes in UK higher education in recent years, the fundamental structural elements of the admissions process in England for most students have not changed significantly for many years. A brief overview of the way that the current admissions processes work for most students can be found in **Annex A**.

21. In undertaking our review, we are acting in our capacity as an independent regulator that can convene stakeholders across the education system in order to open discussion and debate. We are approaching this review without preconceptions about the overall effectiveness of the current admissions system or the efficacy of future changes that could be implemented. By taking an open-minded approach to this review, we will be well-placed to assess and evaluate a wide range of perspectives, before setting out views about any future changes. Where the OfS considers taking action as a result of the evidence gathered, we will have regard to each of our general duties.[5] These include a requirement to have regard to the need to protect institutional autonomy. 'Institutional autonomy' includes the freedom for higher education providers to determine the criteria for the admission of students for their institution. We will need to balance this requirement with the interests of students and others.

22. This is not to say that the OfS takes a neutral position in relation to each of the issues that this consultation document identifies. For example, we have made clear that the rapid rise in unconditional offer-making, particularly 'conditional unconditional offers', is a matter of concern. Similarly, we have argued publicly that contextual offer-making could be further developed to make more radical progress towards narrowing the gaps between the most and least advantaged groups in higher education.

23. The higher education sector in England comprises a diverse range of providers, delivering a diverse range of higher education courses across different modes and patterns of delivery. For example, data published by HESA indicates that, for the academic year 2017-18, 46 per cent of entrants to higher education in England were not full-time undergraduate students.[6] Through our review, we hope to learn more about admissions practices in **all types of provider**, across the range of higher education courses. This includes provision where **more than one provider or organisation** is involved in the admissions process; for example, where providers deliver higher education with others under a **partnership arrangement**, or work in **partnership with employers** in a **higher or degree apprenticeship** or other **work-based learning programme** in a higher education context.

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[5] The OfS's general duties are set out in section 2 of HERA. See
http://www.legislation.gov.uk/ukpga/2017/29/contents/enacted
[6] See https://www.hesa.ac.uk/data-and-analysis/sb254/figure-16. This does not include providers that do not return data to HESA.

24. While there is currently more evidence and debate surrounding the admissions process for **full-time UK-based undergraduate applicants** applying whilst studying for a Level 3 qualification such as A-levels, our review also seeks to advance understanding of issues for **all** types of applicants for **all** types of **higher education** course.

25. **'Higher education'** means courses that meet the definition in schedule 6 of the Education Reform Act 1988 and the OfS understands this to mean courses leading to qualifications at level 4 or above in the **Framework for Higher Education Qualifications (FHEQ)**.[7] This means that a **broad range of courses** leading to qualifications at **Levels 4 and 5, undergraduate**, and **postgraduate (taught and by research)** are all in scope of our review, together with **part-time** and **full-time** modes of study and different patterns of delivery such as **distance learning** and **work-based learning including higher and degree apprenticeships**.[8] Similarly, **UK/EU-domiciled** and **international, young** and **mature** applicants are all included in our review. Some of the issues that our review will raise (e.g. the use and accuracy of predicted grades) can only apply to certain types of applicant or certain types of course but many of the issues apply to all applicants.

26. As the independent regulator of higher education in England, a review of admissions systems in the other UK nations is beyond the OfS's remit. However, we acknowledge that admissions systems across the UK are interconnected and we will work with relevant regulatory and funding bodies in the other UK nations in relation to this review. We also recognise that any changes to the higher education admissions system in England will require collaboration and partnership with stakeholders from across the UK's education system.

27. This consultation is a key part of our review. It sets out and invites responses to:

   - A proposed set of principles for a reliable, fair and inclusive admissions system

   - Ten issues across each stage of an applicant's experience of the admissions process that we believe warrant discussion (respondents are also invited to identify any further issues which they consider to be relevant to our review)

   - Three options that are currently being widely discussed in relation to the future direction of the undergraduate full-time admissions system, together with any other approaches that stakeholders think should be considered, including in relation to the wider English higher education admissions system.

28. In addition to this consultation, the review will include:

   - A series of roundtable events that will gather a representative sample of providers to explore specific issues or future options relating to this review. Evidence from these events, anonymised as appropriate, will be formally recorded and fed into the review.

   - Direct engagement with students to gather their views through roundtable discussions and workshops, online forums, and also with teachers and advisers through school-

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[7] For the FHEQ, see https://www.qaa.ac.uk/quality-code/qualifications-and-credit-frameworks

[8] Level 4 and 5 qualifications include Foundation degrees, Higher National Certificates and Higher National Diplomas

level associations and third-sector organisations where possible. Again, evidence from these events, anonymised as appropriate, will be formally recorded and fed into the review.

29. The OfS may also create and publish additional evidence, as well as drawing on evidence from other sources, such as the emerging evidence from the Universities UK (UUK) review on fair admissions.

30. Alongside our stakeholder engagement, we will also maintain dialogue with the Department for Education, UCAS, Student Loans Company (SLC) and our counterparts in the devolved administrations to gather evidence and to ensure that the implications of any potential changes to the admissions system are fully considered.

# Consultation

## Principles for a reliable, fair and inclusive admissions system

31. Over the last 20 years or so, there have been numerous reviews of the UK higher education admissions system, notably:

    - The Dearing Report 1997, a wide-ranging review which observed the need to ensure that the admissions system 'supports students to make the best decisions at an important time in their lives' and went on to recommend the establishment of a system of post-qualification admissions.[9]

    - A 2004 review of the admissions system by the Admissions to Higher Education Steering Group chaired by Professor Stephen Schwartz, which developed a set of principles for fair admissions that it recommended all universities and colleges should adopt.[10]

    - In 2012, a UCAS review of admissions processes, which consulted on a series of proposed reforms, many of which have since been implemented, including improved IT systems, additional guidance and better data quality.[11]

    - The UUK fair admissions review, launched in 2019, with a focus on admissions processes for undergraduate home students.[12]

32. Common themes emerged from these reviews: the importance of fairness and transparency within the admissions system; the need for accurate information to support applicants' in their decision-making; and a commitment to widening participation in higher education.

33. We have re-cast the principles set out in the 2004 Schwartz review to make them more applicant-focused, since a reliable, fair and inclusive admissions system should have the interests of applicants at its heart. We have added an additional principle, about commanding public confidence, and an overarching principle. We have not included a separate principle about minimising barriers for applicants, as the Schwartz principles did. This is because we consider that the issues encapsulated within that principle are addressed by the other principles.

34. The additional (fifth) principle reflects the fact that, in the context of growing concern about some specific admissions practices, there is a risk that the English higher education admissions system could cease to command public confidence. This could, in turn, risk the reputation of English higher education which would not be in the interests of students or others associated with the higher education sector.

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[9] The Dearing Report (1997) 'Higher education in the learning society'. See
http://www.educationengland.org.uk/documents/dearing1997/dearing1997.html

[10] 'Fair admissions to higher education: recommendations for good practice' by the Admissions to Higher Education Steering Group, chaired by Professor Stephen Schwartz, 2004. See
https://dera.ioe.ac.uk/5284/1/finalreport.pdf [PDF]

[11] See https://www.ucas.com/file/956/download?token=y8EovXLo [PDF]

[12] See https://www.universitiesuk.ac.uk/policy-and-analysis/Pages/fair-admissions-review.aspx

35. In framing the overarching principle, our starting premise is that a reliable, fair and inclusive admission system should enable **all** students to be matched to a course and provider which best suits their needs, achievements and potential. While many students may be well matched, not every student is. The results of the student polling conducted as part of UUK's fair admissions review, show that two in five respondents agree that if they could go back, they would make a different decision.[13] This overarching principle links to the OfS's first regulatory objective in the context of the admissions system.[14]

**Table 1: Revised principles for a reliable, fair and inclusive admissions system**

| Overarching principle: All students, whatever their background, should be able to choose between and select courses and providers matched to their needs, achievements and potential. |
| --- |
| 1. Applicants, their advisers and higher education providers should find that the admissions system is transparent and that they have access to full information, presented in such a way that enables applicants to make effective choices. |
| 2. Applicants should be given the opportunity to demonstrate their achievement and potential with clear evidence and should know how this evidence will be used by higher education providers to select students. |
| 3. Applicants should be assessed using methods that are reliable, fair and inclusive. |
| 4. Applicants, their advisers and higher education providers should experience a system that is professional in every respect and underpinned by appropriate institutional structures and processes. |
| 5. The public should have confidence in the admissions system. |

**For all**

**Question 1:** Are these revised principles for the admissions system valid? If not, what amendments would you suggest?

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[13] See https://www.universitiesuk.ac.uk/news/Documents/uuk-perceptions-fairness-comres-research.pdf [PDF]
[14] Our first regulatory objective is to ensure that **all** students, from **all** backgrounds, with the ability and desire to undertake higher education, are supported to access, succeed in, and progress from, higher education.

# Issues

36. We have brought together ten issues for discussion in this consultation. The issues take account of the principles set out above, along with the issues that have been identified by students, media and in other reviews of the admissions system. Alongside this, we have identified four issues that, for different reasons, are out of the scope of this review. These are summarised in Table 2 below.

37. We have also identified an overarching issue. In framing that overarching issue, our starting premise is that **not every** student is currently matched to a course and provider which best suits them. Whilst many students may be well matched to appropriate courses and providers, recent student polling for the UUK fair admissions review shows that two in five respondents agree that if they could go back, they would make a different decision.[15]

38. For each of the ten issues, we have identified the **applicant groups**, **modes of study, patterns of delivery** and '**type' of provider** to which that issue may be relevant. Our review is broad in scope and we are focusing on all parts of the admissions system. However, much of the existing evidence relates to the UCAS application system for **full-time undergraduate** applications and, therefore, some of the issues that we have highlighted are of particular relevance to that part of the system. Similarly, some of the issues may be more relevant to '**selective' providers** who currently admit fewer students from under-represented groups.

39. Through our review, we would also like to gather evidence about how the issues that we have brought together in this consultation, and any other issues identified by respondents, might affect the **wider admissions system**.

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[15] See https://www.universitiesuk.ac.uk/news/Documents/uuk-perceptions-fairness-comres-research.pdf [PDF]

**Table 2: Issues in scope**

| Overarching issue: The admissions process does not always work in the interests of students, who may not always choose between and select the providers and courses best suited to them. | | |
| --- | --- | --- |
| **Issues in scope** | **Applicant groups, modes of study and patterns of delivery potentially affected** | **Relevant provider types** |
| **Pre-application stage** | | |
| **Issue 1**<br>Advertised entry requirements versus actual entry requirements | All applicant groups, modes of study and patterns of delivery | All provider types |
| **Issue 2**<br>The use and accuracy of predicted grades in undergraduate admissions | Undergraduate applicants applying through UCAS or directly to providers, on the basis of predicted grades | All provider types |
| **Application stage** | | |
| **Issue 3**<br>The use of assessment methods, including:<br>• Personal statements and references<br>• Auditions, portfolios, admissions tests and interviews | All applicant groups, modes of study and patterns of delivery | May be more relevant to:<br>• 'selective' providers, which admit applicants with higher entry grades or have lower participation rates amongst underrepresented groups<br>• specialist providers such as those providing performing arts courses<br>• providers which deliver postgraduate (by research) provision |
| **Offer-making stage** | | |
| **Issue 4**<br>The role of contextual offers and contextual admissions | All applicant groups, modes of study and patterns of delivery | All provider types |

| Issues in scope | Applicant groups, modes of study and patterns of delivery potentially affected | Relevant provider types |
|---|---|---|
| **Issue 5**<br>The use of unconditional offers and 'attainment offers' | Principally applicants applying through UCAS, or directly to providers, on the basis of predicted grades | Potentially all provider types though may be of particular relevance to providers which have lower entry tariffs or who have higher levels of participation amongst underrepresented groups. |
| **Issue 6**<br>The use of offer incentives, inducements and false marketing claims | All applicant groups, modes of study and patterns of delivery | All provider types |
| **Post-results stage** | | |
| **Issue 7**<br>Applications which are made later in the admissions cycle, including the use of the UCAS Clearing system | Potentially all applicants.<br>May be particularly relevant to applicants applying for full-time undergraduate courses through UCAS | Potentially all provider types<br>May be particularly relevant to providers that use the UCAS admissions system for full-time undergraduate admissions. |
| **Cross-cutting issues** | | |
| **Issue 8**<br>The transparency of the admissions process | All applicant groups, modes of study and patterns of delivery | All provider types |
| **Issue 9**<br>Applicants' experience of the admissions process | All applicant groups, modes of study and patterns of delivery | All provider types |
| **Issue 10**<br>Stakeholders' perceptions of the extent to which the English higher education admissions system is fair and effective | All applicant groups, modes of study and patterns of delivery | All provider types |

**Issues out of scope:**

- The quality and availability of advice and guidance
- The efficacy of assessment methods as predictors of future success
- Student contracts and consumer protection
- The structure of partnership arrangements, where providers work together to deliver higher education

### Issue one: Advertised entry requirements versus actual entry requirements

40. Higher education providers set their own entry requirements, and these vary widely across providers and from course to course within providers. Providers may also apply different requirements to different groups of students.

41. In this issue, we would like to understand the extent to which there are discrepancies between advertised entry requirements and the actual entry requirements that are required by providers. By 'entry requirements' we mean academic or skills requirements. For example, Level 3 qualifications (for undergraduate applicants) and undergraduate degree results (for postgraduate applicants) but also other requirements such as vocational qualifications and work or life experience. Providers' approaches to Accreditation of Prior Learning (APL) and Accreditation of Prior Experiential Learning (APEL) also fall within the scope of this issue.

42. Entry assessment methods, such as interviews, auditions or the submission of portfolios, are outside the scope of this issue; we consider those under **issue three** below. Wider entry requirements, such as visa requirements for international applicants, are also outside the scope of this issue.

43. We note that offers made to applicants do not always reflect the published entry requirements. This happens particularly in relation to undergraduate admissions, for example where unconditional offers are made (considered further in issue five). Similarly, offers made to mature applicants may not reflect standard entry requirements, since those applicants may be given credit for work or life experience.[16] In addition, there may be situations where providers know that factors outside of an applicant's control, such as illness, have affected their attainment and so reduce their actual entry requirements accordingly. Making offers to international applicants may also present particular challenges, since it requires a good understanding of how international qualifications map to UK qualifications.[17]

44. Notwithstanding the types of offer referred to above, we would like to explore the discrepancies that may be found between the advertised entry requirements and the actual entry requirements that are required by providers.

45. Much of the existing evidence about discrepancies between advertised and actual entry requirements relates to entry grade requirements for 18-year-old UK applicants, applying with a Level 3 qualification through the UCAS system for **full-time undergraduate** courses. We consider that evidence further below. However, we are also keen to understand the experiences of other types of applicant, including **EU domiciled, international** and **mature**

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[16] UCAS publishes guidance for mature applicants applying for undergraduate courses noting that many providers will be flexible about their entry requirements and may consider access course credits, professional qualifications, Open University or other higher education credits, and skills and work experience in place of traditional qualifications. See https://www.ucas.com/undergraduate/student-life/mature-students/mature-students-your-qualifications

[17] UCAS End of Cycle Report 2019, Chapter 8: Qualifications notes that, each cycle, UCAS applicants hold over 750 different qualifications, something which UCAS notes is almost unique to the UK. See https://www.ucas.com/file/292726/download?token=wswAnzge [PDF]

applicants and those who applied (or are intending to apply) **directly** to providers for **postgraduate, part-time** or **distance learning** undergraduate courses, or for other courses which are not covered by the UCAS admissions system including **higher or degree apprenticeships** and other types of **work-based learning** in the higher education context.

46. Similarly, we are keen to hear from a **broad range of providers** about whether this issue has a wider impact across the English higher education admissions system. We would also like to hear about any particular issues that may arise where **more than one provider or organisation** is involved in determining entry requirements (whether advertised or actual). This might be where providers deliver learning opportunities together under a **partnership arrangement** or where providers work with employers to deliver **higher or degree apprenticeships** or other **work-based learning** in the higher education context.[18]

47. In relation to grade requirements for **full-time undergraduate** admissions, the UCAS End of Cycle Report 2019 shows that across the UK, 49 per cent of placed applicants were accepted with grades lower than the advertised grade requirements.[19] Some of those applicants may have been placed through the Clearing system after their results were known, others following confirmation of offers made on the basis of predicted grades. This data only indicates whether actual entry grades matched advertised entry grades and so does not tell us about offer-making practices. So, this data does not indicate whether offers made based on predicted grades were in line with advertised entry requirements (and then reduced after results were known) or whether offers were lower than advertised entry requirements from the start. Given the high proportion of placed applicants accepted with lower grades than advertised, it is likely that both practices are widespread.

48. In Scotland, universities have committed to publish standard and minimum entry requirements. This approach has been agreed to widen access for disadvantaged students through increasing transparency of the range of entry requirements that will be considered by admissions staff. The minimum entry requirement has also been used to guarantee places to care leavers who are able to meet this threshold. This approach recognises the likely additional challenges that care leavers may have faced in securing their qualifications and the potential those achievements are likely to reflect.

49. Published entry requirements are an important piece of information available to applicants and may inform their choices about which providers to apply to. A mismatch between advertised and actual entry criteria lacks transparency. Prospective students who would meet the actual entry requirements may be dissuaded from applying to providers or particular courses because of the advertised, higher, entry requirements. This may be particularly

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[18] The way in which partnership arrangements, such as validation arrangements, are structured and the pros and cons of those arrangements is of wider relevance, beyond the admissions system. A detailed consideration of those issues is beyond the scope of this review and, in due course, will form a separate strand of work for the OfS.

[19] UCAS End of Cycle Report 2019: Insight Report: Realising Ambition. See https://www.ucas.com/file/286346/download?token=DookHVk1 (p.3) [PDF]

These findings were based on 18-year-olds domiciled in England, Northern Ireland and Wales, with at least three predicted A-levels, who have been accepted on courses for which A-level entry requirements have been supplied to UCAS.

relevant to applicants who have less access to well-informed guidance from parents and advisers.

50. Some providers impose subject specific entry requirements for some courses. Some providers may give greater weight to certain subjects ('facilitating subjects') at Level 3, when making their admissions decisions.[20] Similarly, some providers may take GCSE (or equivalent) subjects and grades into account. Where published information does not make these requirements clear to applicants, this lacks transparency and may cause confusion for applicants. Applicants may apply for courses where they do not meet the providers' **actual** entry requirements. Applicants whose GCSE results do not meet providers' (unpublished) requirements, may not understand why they have not received an offer when they appear to have met the (published) entry requirements for Level 3.

51. The quality and availability of advice and guidance for applicants and prospective applicants, as a standalone issue, is beyond the scope of this review because it forms a separate strand of work for the OfS and other sector bodies. We published our information, advice and guidance strategy in April 2019.[21] More recently, we have worked with the higher education funding and regulatory bodies across the other UK nations to launch Discover Uni, a website which includes official statistics about higher education providers and their courses for undergraduate applicants.[22] This site will continue to be developed over the coming months. However, we do consider some elements of advice and guidance in our analysis of the ten issues outlined in this consultation, where such consideration is integral to our analysis of those issues. Any evidence about advice and guidance that we obtain through our admissions review will, of course, inform the further development of our information, advice and guidance strategy, and associated workstreams, going forwards.

52. Through student information services, such as Discover Uni, it is possible for undergraduate applicants to see the actual qualifications on entry (expressed as UCAS points) of students who have gained places on courses in recent years, although this covers all qualifications on entry and therefore may include a wider range of qualifications than in the offers made. However, many popular information sources about undergraduate courses display the advertised rather than actual entry requirements.[23] UCAS is also working with providers to increase transparency in this area.

53. We would also like to hear stakeholders' views about the use of **integrated 'foundation' years**, sometimes referred to as 'Year 0' years.[24] An integrated foundation year is an integrated additional year of study for students who may not meet the standard requirements for entry at undergraduate level and should not be confused with Foundation degrees. Integrated foundation years are designed to help applicants develop the academic and other

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[20] See for example https://www.informedchoices.ac.uk/

[21] See www.officeforstudents.org.uk/publications/ofs-strategy-on-student-information-advice-and-guidance/

[22] See https://discoveruni.gov.uk/

[23] For example, the Complete University Guide website (https://www.thecompleteuniversityguide.co.uk/universities/applying-to-university-and-ucas-deadlines/requirements-and-qualifications) and providers' own websites.

[24] Standalone foundation years are beyond the scope of this review.

skills needed to succeed in higher education and are sometimes justified as supporting widening participation in higher education.[25]

54. In the OfS's Insight brief on the topic of contextual admissions in May 2019, we expressed support for some types of foundation years; they were seen as a valuable pathway for students who did not meet their A-level offer, or for those with non-traditional qualifications, such as mature students. [26]

55. However, some concerns have been raised that some integrated foundation (Year 0) years may be used to 'entice' applicants who would not otherwise meet entry requirements. The independent Review of Post-18 Education and Funding chaired by Dr Philip Augar, noted in its May 2019 report that 'it is hard not to conclude that universities are using foundation years to create four-year degrees in order to entice students who do not otherwise meet their standard entry criteria. Most recruiters to these programmes are medium or lower entry tariff institutions, typically universities with a high proportion of students from poorer backgrounds. These students are obliged to take out an additional fourth year of higher and non-cancellable fee loans. We do not consider that this is always in their best interests.' [27]

**For all**

**Question 2:** Is the current mismatch between advertised entry tariffs and actual entry tariffs for undergraduate admissions through UCAS a problem?

**Question 3:** Is there a mismatch between advertised entry requirements and actual entry requirements across the wider admissions system (beyond full-time undergraduate admissions)? If so, is this a problem?

**Question 4:** What are the advantages and disadvantages of integrated foundation (Year 0) years?

**For applicants, students or student groups**

**Question 5:** Are you aware of offers made below advertised entry requirements? If so, what is the impact of these offers in your view?

**Question 6:** Do you think an applicant's approach to higher education admissions would change if they knew the actual entry requirements, as opposed to those advertised?

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[25] See (i) a blog by HESA from May 2019. See https://www.hesa.ac.uk/blog/16-05-2019/foundation-year-research and (ii) a report by the OfS www.officeforstudents.org.uk/publications/preparing-for-degree-study/

[26] See www.officeforstudents.org.uk/publications/contextual-admissions-promoting-fairness-and-rethinking-merit/ [PDF] (p.6)

[27] See https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/805127/Review_of_post_18_education_and_funding.pdf [PDF] (p.103)

**For staff working in providers**

**Question 7:** Are you able to explain the mismatch between advertised entry tariffs and actual entry tariffs for undergraduate admissions through the UCAS system, and the rationale behind it?

**Question 8:** If you think that there is a mismatch between advertised entry requirements and actual entry requirements across the wider admissions system (beyond full-time undergraduate admissions), are you able to explain it?

**Question 9:** If, when making admissions decisions, you give more weight to certain 'facilitating' subjects at Level 3 and/or take into account applicants' GCSE (or equivalent) results, how do you make this clear to applicants?

**Question 10:** If your provider offers an integrated foundation year, please explain the circumstances in which these may be offered and how these years are then delivered.

## Issue two: The use and accuracy of predicted grades in undergraduate admissions

56. Most applicants who apply to English higher education providers through the **UCAS full-time undergraduate** admissions system do so during their final year of a Level 3 qualification, such as A-levels or BTEC, and before their results are known. Schools or colleges must predict applicants' final grades as part of this application process and providers then decide whether to make offers based, in part, on those predicted grades. The use and accuracy of predicted grades in this context has been subject to increasing scrutiny in recent years and we consider existing evidence below.

57. However, there is very little evidence about how predicted grades may be used for **undergraduate** applicants applying **directly** to higher education providers, and not via UCAS. We are interested to understand the ways in which predicted grades are used in **direct application** scenarios such as for **part-time, distance learning** and **work-based learning** provision at an **undergraduate level**, and whether, in the view of different stakeholders, there are any issues in the use of predicted grades for these types of applicant.

58. In 2016, a report by Dr Gill Wyness for the University and College Union noted that only 16 per cent of applicants achieved the A-level grade points that they were predicted to achieve, based on their best three A-levels.[28] The report found that 75 per cent of applicants' grades were over-predicted – the actual grades that they achieved were lower than their predicted grades – with the grades of students from disadvantaged backgrounds and state schools more likely to be over-predicted than those from independent schools. Conversely, the report also found that, amongst high-attaining students, those from low income backgrounds were significantly more likely to have their grades under-predicted. This is relevant because applicants with under-predicted grades are more likely to apply to courses for which they may be 'over-qualified' by reference to the attainment levels of other students.[29]

59. In their December 2019 comment piece for Wonkhe, Wyness and Macmillan referenced research which studied a cohort of 18-year-olds who started university in 2008.[30] They found that, at every level of attainment, students from disadvantaged backgrounds attend less academically prestigious courses, and courses with lower earnings potential, than students from more advantaged backgrounds.[31] The article looked at different factors which may drive the mismatch, including subjects studied, geography and school attended and found that school attended accounted for the majority of the 'mismatch' amongst students from disadvantaged backgrounds. This is relevant in light of concerns around the accuracy of predicted grades of students from disadvantaged backgrounds in particular, given that predicted grades will inform students' choices of which providers (and courses) to apply to.

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[28] Predicted grades: accuracy and impact, a report for University and College Union, Gill Wyness, UCL Institute of Education, December 2016. See https://www.ucu.org.uk/media/8409/Predicted-grades-accuracy-and-impact-Dec-16/pdf/Predicted_grades_report_Dec2016.pdf [PDF]

[29] The Wyness report used bespoke data provided by UCAS.

[30] See https://www.nuffieldfoundation.org/project/undermatch-in-higher-education-prevalence-drivers-and-outcomes/

[31] 'Students mismatching with courses affects their life chances', Gill Wyness and Lindsey Macmillan for Wonkhe December 2019. See https://wonkhe.com/blogs/students-mismatching-with-courses-affects-their-future-life-chances/

60. In a June 2018 report for the University and College Union, Dr Graeme Atherton referenced the 2016 Wyness research in support of his argument for a system of post-qualifications applications in England, Wales and Northern Ireland.[32] Dr Atherton noted that none of the other 29 countries surveyed in his study offered higher education places on the basis of predicted grades. Dr Atherton set out more details of his proposed system of post qualifications applications in a subsequent report published in January 2019.[33] We consider the issues and potential options around post qualifications offers or applications further in the **'Future options'** section of this consultation.

61. The UCAS End of Cycle Report 2019 discusses continuing concerns about the reliability of predicted A-level grades. The report states that, in 2019, only 21 per cent of accepted 18-year-old applicants with three or more predicted A-levels met or exceeded their predicted grades; a decrease of 3 percentage points on the previous year.[34] In addition, 43.2 per cent of accepted applicants had a difference of three or more A-level grades; an increase of 5 percentage points since 2018. The report indicates that, on average, 18-year-old UK students studying A-levels are predicted 2.35 grades above their achieved grades, with the difference increasing for lower attainment profiles.[35]

62. There is anecdotal evidence that suggests that the process of arriving at predicted grades can often be the topic of protracted debate between students, school staff and parents.[36] Teachers report that they are placed under pressure from senior staff, students and parents to submit what they believe to be overly ambitious predicted grades in order to facilitate applications to a wider choice of providers. The process of predicting grades may itself impact on students' motivation and aspiration, positively or negatively. If predicted grades are inaccurate, and those predictions are not then used by providers assessing applications in any event, it could be argued that the use of predicted grades does not represent an efficient use of students', teachers' or admissions staff's time.

63. The impact of unconditional offers on academic attainment is considered in **issue five** below. Under that issue, we note analysis which suggests that applicants with unconditional offers are more likely to miss their predicted grades by three or more grades than their peers with conditional offers.

64. Through this consultation, we would like to understand stakeholders' views about the use and accuracy of predicted grades in **undergraduate admissions**. We are interested in hearing from relevant **staff within schools and colleges** about perceived challenges in predicting

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[32] 'Post Qualifications Admissions: How it works across the world', Dr Graeme Atherton, June 2018, for the University and College Union. See https://www.ucu.org.uk/media/9430/Post-Qualifications-Admissions-How-it-works-around-the-world/pdf/UCU_PQA_around_the_world_Report_June18.pdf [PDF]

[33] 'Post-qualification application: a student-centred model for higher education admissions in England, Northern Ireland and Wales' a report by Dr Graeme Atherton and others, January 2019. See https://www.ucu.org.uk/media/10041/Post-qualification-application-a-student-centred-model---Jan-2019/pdf/PQA_report_Jan19.pdf [PDF]

[34] UCAS End of Cycle Report 2019, Chapter 8: Qualifications. See https://www.ucas.com/file/292726/download?token=wswAnzge [PDF]

[35] This work builds on the UCAS report published in August 2016, which includes differences in predicted and achieved grades for many different measures of background. See https://www.ucas.com/file/71796/download?token=D4uuSzur [PDF]

[36] See https://policyexchange.org.uk/wp-content/uploads/2019/06/Sins-of-Admission.pdf [PDF] (p.26)

grades, including any difficulties relating to accuracy and whether they feel pressured to over (or under) predict grades for some applicants. We are also interested in hearing about the processes that staff follow and the factors that they take into account when making those predictions. We would also like to hear a **broad range of applicants'** views on the use of predicted grades in **undergraduate** admissions and the extent to which their choice of provider is influenced by their predicted grades.

65. As we note above, more is currently known about the use of predicted grades in the **UCAS full-time undergraduate** admissions process. However, we are also interested in hearing stakeholders' views about how this issue might be relevant to the wider **undergraduate** admissions system, where applicants apply directly to providers.

**For all**

**Question 11:** Are predicted grades a useful part of the current undergraduate admissions process?

**Question 12:** To what extent do you consider predicted grades to be a helpful indicator of an applicant's merit and potential?

**For applicants, students or student groups**

**Question 13:** How easy or challenging was it to secure what you would see as fair and accurate predicted grades?

**Question 14:** If you applied through UCAS, how important did you perceive predicted grades to be?

**Question 15:** If you applied directly to a provider, how important did you perceive predicted grades to be?

**For staff working in schools or colleges**

**Question 16:** Please describe the process through which you arrive at predicted grades, including the factors that you take into account and whether there is a formal process that all staff are asked to follow.

**Question 17:** Could you describe what pressures, if any, there are to inflate or deflate applicants' predicted grades? What is the impact of this?

**For staff working in providers**

**Question 18:** In what ways do predicted grades inform offer-making in your provider?

# Application stage

## Issue three: The use of assessment methods, including personal statements, references, auditions, portfolios, admissions tests and interviews

66. We have identified concerns that some admissions processes may act as a barrier to entry to higher education for some applicants, in particular those from disadvantaged backgrounds or underrepresented groups. We are also interested to understand the levels of transparency regarding the use of different assessment methods in admissions processes. Transparency as an overarching issue is also covered in issue nine.

67. Through this consultation, the OfS wishes to explore how different admissions methods are used across the sector, what barriers they might create for applicants and what weight is placed upon these assessment methods by providers. Much of the existing evidence relates to **UK domiciled** applicants who apply through the **UCAS process** for **full-time undergraduates** and to the more '**selective' providers** who **set higher entry grade tariffs**. We consider this evidence below. However, we would also like to learn more about the experiences of **EU domiciled** and **international** applicants. We would like to understand how different assessment processes are used across the wider admissions system by **different types of provider** in 'direct application' scenarios, for example **postgraduate**, **part-time** and **distance learning provision** as well as **higher and degree apprenticeships.** Currently, much less is known about the use of assessment methods in those scenarios.

68. Applicants applying through UCAS for undergraduate level courses are required to complete a personal statement and to provide a reference from a teacher, adviser or professional who knows the applicant academically. Applicants who are applying through the UCAS Conservatoires scheme are required to complete a personal statement and to provide two references: one academic and one practical.[37]

69. UCAS has published guidance for applicants on writing a personal statement, indicating that the statement is an applicant's chance to describe their '*ambitions, skills, and experience'* to show why they are suitable for the course(s) for which they are applying.[38]

70. In its December 2017 study, the Sutton Trust noted that applicants from disadvantaged backgrounds are less likely to be supported in preparing their personal statements and are able to provide fewer examples of the types of work and life experiences that many higher education providers use to decide between applicants.[39]

71. Furthermore, a December 2012 study also from the Sutton Trust found that there are differences in the presentation and accuracy of personal statements between different school

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[37] There are 10 conservatoires in the UCAS Conservatoires scheme, providing education and training in the performing arts at both undergraduate and postgraduate level. See https://www.ucas.com/conservatoires

[38] UCAS guidance on writing personal statements for undergraduate applications. See https://www.ucas.com/undergraduate/applying-university/how-write-ucas-undergraduate-personal-statement

[39] Rules of the Game: Disadvantaged Students and the university admissions process, Gill Wyness, December 2017 (The Sutton Trust), p.3. See https://www.suttontrust.com/wp-content/uploads/2017/12/Rules-of-the-Game.pdf [PDF]

types.[40] Applicants from sixth form colleges were found to have made three times as many writing mistakes as those from independent schools. This finding suggests that the quality of support provided to students from different backgrounds varies significantly and leads to differences in the quality of personal statements between different school types, even where the students went on to receive identical grades at A-level.

72. Other research from 2016 suggested that sections of detailed analysis and reflection in personal statements are valued by admissions tutors and recommended that schools and colleges should support applicants in providing opportunities to undertake and reflect upon academic enrichment activities. The research suggested that this approach may help to address some of the unfairness and imbalance faced by applicants from less advantaged backgrounds in relation to the use of personal statements as an admissions tool.[41]

73. As well as being an admissions assessment method, personal statements may also serve a wider function. They may play a role in applicants' decision-making; the process of drafting a statement which is targeted towards a particular course may lead the applicant to decide that, actually, they do not want to study that course at all. The same may be said of preparation for auditions and/or the putting together of portfolios; those assessment methods are considered further below.

74. The personal statement and reference(s) may contain important contextual information about the applicant. However, for this to be an effective tool, providers must use contextual information in a way that is transparent and understood by applicants and their advisers. The use of contextual admissions processes is considered further in this consultation in **issue four.**

75. Similarly, personal statements (and references) could be an opportunity for applicants, and referees, to highlight any particular issues which the provider should know in order properly to support the applicants, through the admissions assessment process and once they become students. Anecdotal evidence suggests that applicants, and referees, may be reluctant to provide this sensitive information in case it adversely affects the applicant's chances of receiving an offer.

76. We are keen to explore the role that references play within the admissions system and the weight that providers place upon them. There is little evidence about how providers use references in their decision-making, and we hope to understand that issue better through this consultation and our review. If providers do place a lot of weight upon references then this may disadvantage **mature** students, who may struggle to find suitable referees if it is some time since they last undertook formal study, and applicants whose advisers are less experienced in writing references for higher education. We also note that, as with predicted grades, advisers may feel under pressure to write complimentary references for all applicants;

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[40] 'The Personal Statement: A fair way to assess university applicants?', Dr Steven Jones, December 2012 (The Sutton Trust). See https://www.suttontrust.com/wp-content/uploads/2012/12/JONESPERSONALSTATEMENTS-2.pdf [PDF]

[41] Research Brief: Making a Statement (January 2016) by Dr Steve Jones (University of Manchester) and the HE Access Network (for the Sutton Trust). See https://dera.ioe.ac.uk/30234/1/Making-a-Statement-FINAL-1.pdf [PDF]

we would like to hear from them about those pressures and any other challenges that they face in producing references.

77. Applicants may also be required to undergo an interview, aptitude testing or entrance examination as part of the admissions process. These requirements appear to be more common at 'high tariff' providers and for professional training courses such as medicine, veterinary science, nursing and teaching.[42] Through this review, we are keen to understand the extent to which these sorts of requirements are used by providers across the admissions system, including where applications are made **directly** to providers rather than through UCAS.

78. Applicants to conservatoires or for creative and performing arts courses at other providers, may be required to undergo an audition or to submit a portfolio of their work.[43] The UCAS End of Cycle Report 2019 notes that 13 per cent of offers made to young people for creative arts and design courses were unconditional (18 per cent in the UCAS End of Cycle Report 2018) which, UCAS says, 'is unsurprising as assessment of an applicant's portfolio often determines their suitability for the course'.[44] Demonstration of potential via this form of assessment may therefore carry more weight in reaching an admissions decision than examination results. Some stakeholders have expressed the view to the OfS that these sorts of assessment methods create more transparency in admissions processes and we are keen to hear a wider range of views on this issue. The use of unconditional offers is considered further in this consultation in **issue five**.

79. A 2009 study which reviewed admissions practices for art and design courses concluded that 'the over-emphasis on particular 'attributes' associated with having potential, such as academic writing skills, and 'creativity', serves to exclude those groups traditionally underrepresented on such courses'.[45] We note that applicants from less privileged backgrounds and **mature** applicants may not have access to support to help them to prepare for interviews, auditions and entrance examinations, or to compile portfolios. This could disadvantage them in those sorts of admissions tests.

80. The potential financial costs of attending general and/or offer-holder open days, interviews, auditions or other admissions tests is an issue that has caused public concern and is one that we would like to explore through our review.[46] In a UCAS survey of 18-19 year old UK domiciled UCAS undergraduate applicants in the 2015 admissions cycle, respondents

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[42] For example, some UK universities use the University Clinical Aptitude Test (UCAT) and the BioMedical Admissions Test (BMAT) as part of their selection process for medicine and dentistry programmes. The Universities of Oxford and Cambridge also set a number of subject-based admissions tests as do some other providers. The UCAS website has more information on these tests. See https://www.ucas.com/undergraduate/applying-university/admissions-tests

[43] In February 2020, AccessHE launched the second edition of its guide to support applicants in applying for a range of creative subjects. See https://www.accesshe.ac.uk/resources/publications-practitioner-resources/

[44] UCAS End of Cycle Report 2019, Chapter 5. See https://www.ucas.com/file/292711/download?token=hPNcy1Qo [PDF] (p.4)

[45] See p.7: Burke, P.J, and McManus J., (2009), Art for a few, Exclusion and Misrecognition in Art and Design Higher Education Admissions. See https://www.heacademy.ac.uk/system/files/naln_art_for_a_few.pdf [PDF]

[46] See the podcast from the BBC 'The Next Episode' which discusses the costs of applying to be an actor: https://www.bbc.co.uk/programmes/p080bcl3

highlighted the costs of travel arrangements and overnight accommodation, where the scheduling of interviews or other tests did not enable applicants to travel on the day, as a potential barrier to applications. 49 per cent of respondents from disadvantaged backgrounds also cited cost as the main reason for not attending more open days.[47] We understand that some providers offer bursaries or other financial support to some applicants, to help meet the costs of attending interviews or other admissions tests. We are keen to hear stakeholders' views on whether financial costs act as a barrier to entry for applicants from some backgrounds and if so, what is being done (and what more could be done) to remove those barriers.

81. Some providers charge fees for applications for **postgraduate** study which may act as a barrier to application for applicants from some backgrounds. Furthermore, where the providers charging those fees are not transparent about the actual entry requirements for their courses, applicants may be spending money on applications where they have little chance of being offered a place.

82. Anecdotal evidence also indicates that some providers may use interviews as a 'conversion tool'; they invite applicants to interviews to provide an opportunity to offer inducements such as lower requirement offers, rather than as a genuine part of the application assessment process. These interviews are likely to incur travel costs for applicants and may therefore disadvantage those students who may not have the resources to travel to these types of interview. We would like to hear from applicants about whether they have experienced such practices.

83. We are keen to hear about the experiences of, and challenges faced by, current and recent applicants in relation to different admissions methods. We would like to hear from a **wide range of applicants** including **international applicants** and **mature applicants**, across **all modes** and **levels** of study.

84. A detailed analysis of the efficacy of different admission assessment methods as predictors of successful completion of a higher education course is beyond the scope of this review. However, one of the principles which we have proposed is that applicants should be assessed using methods that are reliable, fair and inclusive. Therefore, this consultation does seek stakeholders' views on different assessment methods.

**For all**

**Question 19:** To what extent does the background of applicants, and the level of support that they have access to, determine their ability to perform well in application requirements, including the completion of personal statements?

**Question 20:** Are providers transparent about when they will use methods such as entrance examinations, interviews or auditions and how this will contribute to decision making?

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[47] UCAS 'Through the lens of students: how perceptions of higher education influence applicants' choices' July 2016. See https://www.ucas.com/sites/default/files/through-the-lens-of-students.pdf [PDF]

**Question 21:** Do you think that some assessment methods, such as requiring the submission of a personal statement, entrance examinations, interviews or auditions, advantages some applicants?

**Question 22:** Do you think that financial costs of attending open days, interviews, auditions, examinations etc. act as a barrier to entry for some applicants? If so, what should be done to remove that barrier?

### For applicants, students or student groups

**Question 23:** To what extent do the different admissions processes used by providers influence applicants' decisions about which providers to apply to?

### For staff working in schools or colleges

**Question 24:** Please describe what pressures, if any, there are to write complimentary references for applicants.

**Question 25:** What other challenges do requirements to produce references present for you (if any)?

**Question 26:** Please describe the ways in which your school or college assists applicants in the preparation of their personal statements (if any).

### For staff working in providers

**Question 27:** How influential are personal statements (or equivalent where applicants apply directly to you) and/or references in your admissions decision-making process?

**Question 28:** In what circumstances, if any, does your provider include requirements such as entrance examinations, interviews or auditions, in your admissions process?

**Question 29:** How does your provider make information about entry requirements such as entrance examinations, interviews or auditions accessible to applicants?

## Offer-making stage

### Issue four: The role of contextual admissions and contextual offers

85.   The 2004 Schwartz review reported on the ways in which higher education providers should assess the merit, achievement and potential of applicants for different types of courses.[48] The review reached three conclusions:

- A fair and transparent admissions process is determined not only by the choice of assessment option but also by how it is implemented;

- Most assessment options are likely to be better indicators of achievement and potential if their implementation acknowledges contextual factors; and

- Acknowledging contextual factors and considering other additional information should help to ensure that all applicants have an equal opportunity to demonstrate relevant achievements and potential.

86.   Students' access to higher education can be affected by a range of circumstances. Contextual admissions are used by higher education providers to take account of these.

87.   Much of the existing evidence, considered below, relates to the **UCAS undergraduate** admissions process and we would like to understand more about the role of contextual admissions for **other applicant groups and modes of study**, including **mature** and **international** applicants and those applying for **postgraduate**, **part-time** and **distance** and **work-based** learning provision including **higher** and **degree apprenticeships**.

88.   The UCAS End of Year Report 2019 notes that, at present, the most educationally advantaged students are 5.27 times more likely to attend a 'higher-tariff' provider than the most disadvantaged.[49] The report does give a number of important indications that the persistent gaps in higher education entry rates between the most and least advantaged students is closing.[50] For example, there is encouraging data that more students in receipt of free school meals are attending those universities requiring the highest entry grades. However, we are concerned that there is still more to do to ensure that applicants from disadvantaged backgrounds have access to the right course and provider for them, and contextual admissions is one way to do that.

89.   UCAS has published a fact sheet for schools and colleges which defines contextual admissions as 'information and data used by universities and colleges, to assess an

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[48] See section F: Admissions to Higher Education Review: '*Fair admissions to higher education: recommendations for good practice*' September 2004. See https://dera.ioe.ac.uk/5284/1/finalreport.pdf [PDF]

[49] UCAS End of Cycle Report 2019, Chapter 6: Widening Access and Participation. See https://www.ucas.com/file/292716/download?token=Q9ctjA-F [PDF]

Broadly, for UCAS purposes, a 'higher tariff' provider is a provider whose UK 18-year-old undergraduate entrants hold higher A-level grades.

[50] UCAS End of Cycle Report 2019, Chapter 10: Equality in England. See https://www.ucas.com/file/311296/download?token=p1nWONan [PDF]

applicant's prior attainment and potential, in the context of their individual circumstances. The aim is to form a more complete picture of the applicant'. [51]

90. Contextual information may include general background data, such as historic data about the area in which the applicant lives, their school or college, and information about the applicant's circumstances, such as whether they are from a disadvantaged background, for example, they qualify for free school meals, or are from a group which is underrepresented in higher education. An applicant's application form, personal statement and reference(s) may also include contextual information about that applicant's individual circumstances.

91. Contextual offers, where the offer of entry is one or more grades lower than the standard offer for that course, are one component of a contextual admissions approach. Contextual data and information may also be used, for example, to inform a decision about whether to invite an applicant for interview, or whether to maintain an offer to an applicant who has narrowly missed their offer entry grades.

92. In the OfS's Insight brief on contextual admissions, '*Promoting fairness and rethinking merit*' (May 2019), we argued that universities should re-think how they judge merit, asserting that 'the grades achieved by a top student in a state school in a deprived community will usually be lower than those of an average performer in a selective or fee-paying school, but they can be considered at least as great an achievement'. The brief contends that contextual admissions should recognise the distance travelled by students in their attainment, and that these types of judgment can inform a more sophisticated assessment of potential. [52]

93. In the Insight brief, we also argued that contextual admissions could be further developed to make more radical progress towards narrowing the gaps between the most and least advantaged groups in higher education. The brief cites the research of Boliver et al. which suggests that universities could be more dynamic in their use of contextual admissions, having found that students admitted to high-tariff universities with A-level grades of BCC have an 80 per cent probability of graduating with a degree, and a 46 per cent chance of gaining a first or upper second.[53] We are reforming our regulation of access and participation to provide the time and flexibility that providers need to make a major change in progress.[54]

94. In Scotland, all higher education institutions have committed to greater transparency in contextual offer-making through publishing a minimum entry threshold. One subset of this commitment is the guarantee of an offer to care experienced applicants who meet minimum entry requirements.[55] The minimum entry requirements are lower than the standard entry

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[51]UCAS factsheet: Contextualised admissions – what it means for your students'. See https://www.ucas.com/file/86786/download?token=zVfQ-oho [PDF]

[52] OfS Insight brief: Contextual admissions: Promoting fairness and rethinking merit' – May 2019. See https://www.officeforstudents.org.uk/publications/contextual-admissions-promoting-fairness-and-rethinking-merit/

[53] Boliver, Vikki, Stephen Gorard, Nadia Siddiqui, 'Using contextualised admissions to widen access to higher education: A guide to the evidence base'. Durham University Evidence Centre for Education, Research Briefing No. 1, 2019. See https://www.dur.ac.uk/resources/dece/ContextualisedHEadmissions.pdf [PDF] (p.3)

[54] See https://www.officeforstudents.org.uk/advice-and-guidance/promoting-equal-opportunities/

[55] For the announcement from Universities Scotland see https://www.universities-scotland.ac.uk/scotlands-universities-to-guarantee-offers-to-care-experienced-applicants-who-meet-minimum-entry-requirements/

requirements that apply to more advantaged peers. In England, there may be scope to extend a similar type of offer to other groups of students where there are clear links between different forms of disadvantage and educational attainment.

95.   A recent report on social mobility and elite universities produced by the Higher Education Policy Institute (HEPI) also suggested that universities should produce two published offers for degree courses, a standard tariff and a minimum tariff of up to three A-level grades lower across three A-levels.[56] The report also proposed that universities should consider using random allocation of places for students over a certain minimum academic threshold.

96.   However, it should be noted that some are not in favour of the widespread use of contextual offers, and raise concerns that they might risk entrenching educational disadvantage by creating an accepted assumption that students from certain backgrounds perform less well than others.[57] Furthermore, in a recent student polling exercise conducted as part of the UUK fair admissions review, 74 per cent of those who had accepted contextual offers agreed with the statement that their contextual offer had 'made me complacent in studying for exams' (compared to 55 per cent of all respondents who had accepted offers who agreed with that statement).[58]

97.   We would like to explore whether greater transparency is needed across the sector to ensure that students understand how providers use the different components of contextual admissions across the application cycle. A report by the Policy Exchange drew on interviews with school staff and pupils who expressed concerns that a lack of transparency about the use of contextual offers was creating a perception of unfairness among teachers and applicants.[59] These concerns seem to be supported by survey findings published by HEPI in July 2019.[60] In this survey, 72 per cent of students thought that higher education admissions should take account of applicants' backgrounds; however 45 per cent of students were opposed to the idea of making lower grade offers to those from disadvantaged areas, with 47 per cent in favour of such an approach. Approximately two-thirds of students (65 per cent) did not know whether their provider made contextual offers. In the recent student polling exercise undertaken by UUK as part of its fair admissions review, 27 per cent of applicants who had received contextual offers said that they did not understand the different types of offer (versus 13 per cent of all respondents).[61] These findings seem to point to a need for much clearer communication about where and how contextual offers are being made.

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[56] 'Social mobility and elite universities' by Lee Elliot Major and Pallavi Amitava Banerjee, for HEPI, December 2019. See https://www.hepi.ac.uk/2019/12/12/it-could-take-a-century-to-hit-the-latest-official-university-access-targets/

[57] See https://policyexchange.org.uk/wp-content/uploads/2019/06/Sins-of-Admission.pdf and https://policyexchange.org.uk/its-time-to-get-serious-about-rebalancing-post-18-education/

[58] See https://www.universitiesuk.ac.uk/news/Documents/uuk-perceptions-fairness-comres-research.pdf [PDF] (p.15)

[59] See https://policyexchange.org.uk/wp-content/uploads/2019/06/Sins-of-Admission.pdf [PDF] (p.45)

[60] HEPI Policy Note: 'What do students think of contextual admissions?' July 2019. See https://www.hepi.ac.uk/wp-content/uploads/2019/07/What-do-students-think-of-contextual-admissions-HEPI-Policy-Note-14-Embargoed-25.07.19.pdf [PDF]

[61] See https://www.universitiesuk.ac.uk/news/Pages/Filling-careers-advice-gaps-would-make-university-applications-fairer.aspx (p.12)

98.     Anecdotal evidence also suggests that some providers now make 'conditional contextual' offers in relation to undergraduate admissions, where the applicant is informed that the offer will have a lower grade requirement if the applicant makes the offer their 'firm' choice. We note in **issue five** below that the use of 'conditional unconditional' offers may constitute pressure selling and therefore breach consumer law. Similar concerns arise in relation to the use of 'conditional contextual' offers.

99.     Through this consultation, we would like to learn more about the way in which providers use contextual admissions processes across the admissions system, and how far different stakeholders feel their use could be adapted. We would like to understand how the diversity of providers use both objective data, such as whether the applicant qualifies for free school meals, and more subjective information, which may be contained within the applicant's application documents and references. We would also like to hear from current and recent **applicants** about their views on, and experiences of, contextual admissions processes and about whether they fully understand the approaches that providers take.

100.    Anecdotal evidence indicates that some providers view league tables as a barrier to contextual admissions, since accepting students with lower grades may influence those providers' 'scores' on the entry qualifications measure which is included in many league tables. The use of league tables is considered further in **issue ten.**

**For all**

**Question 30:** Should providers take contextual information about applicants' backgrounds into account during the admissions process? If so, what sort of contextual information should they use and how should they use it?

**Question 31:** Are providers transparent about their approaches to contextual admissions?

**For applicants, students or student groups**

**Question 32:** Do applicants understand the different approaches that providers take to contextual admissions?

**Question 33:** Do applicants take into account contextual admissions approaches published by providers when deciding which providers (or courses) to apply for?

**For staff working in providers**

**Question 34:** Does your provider take into account contextual information about applicants' backgrounds, during your admissions process? If, so do you then offer additional support to, and/or monitor the outcomes of, students who are accepted on the basis of contextual offers?

**Question 35:** How do you evaluate the effectiveness of your approach to contextual admissions?

**Question 36:** Does your provider make 'conditional contextual' offers to some applicants? If so, for what reasons and on what basis?

**Question 37:** How does your provider make information about your approach to contextual admissions accessible to applicants and their advisers?

## Issue five: The use of unconditional offers and 'attainment offers'

101. The OfS notes that this issue may be of particular relevance to **applicants** who are applying **through UCAS**, or **directly** to providers, on the basis of **predicted grades for Level 3 qualifications** such as A-levels or BTEC. It may also apply more to **providers** which have **lower entry tariffs** and are considered **less 'selective'**. Much of the existing evidence relates to **undergraduate** offers made through the **UCAS** system, and this is considered below. However, we would like to hear the views of a range of stakeholders in relation to this issue, including on whether it is of **wider application** across the English higher education admissions system.

102. An unconditional offer is an offer of a place at a higher education provider that is not dependent on any future academic results, typically A-level or BTEC results. UCAS identifies three broad types of unconditional offer.[62] These are 'direct unconditional' offers which guarantee an applicant a place without any conditions at the first point of offer, the 'conditional unconditional offer' where the offer only becomes unconditional if the applicant makes the offer their 'firm' choice and this has been identified in the UCAS admissions system through free text fields, and 'other unconditional' offers which are conditional at the point of offer and become unconditional before the end of June. A related type of offer is the so-called 'attainment offer' or 'incentivised offer', where the offer is conditional but with very low attainment requirements: for example, two E grades at A-level. Unconditional offers have been used for some time in specific situations - for example: for courses where other entry criteria such as portfolios or interviews lead to A-level results carrying less weight; for students (often **mature** students) who already meet entry requirements; or for students requiring special consideration due to illness or disability.

103. The use of unconditional offers has increased significantly over the last five years. Our Insight brief in January 2019 identified that 3,000 offers with an unconditional component had been made in 2013 and that by 2018 this number had risen to 117,000.[63] In 2018, over a third of 18-year-old applicants received at least one offer with an unconditional element; in 2019 the total number of unconditional offers rose further, to 137,805. Notably, there were 26 per cent more conditional unconditional offers made in 2019 than in 2018, making it the fastest rising form of unconditional offer.[64] Early reports indicate that there may also be a rise in 'attainment offers', with recent news stories indicating that some higher education providers may be shifting away from unconditional offers but towards lower offers instead.

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[62] Different terminology may be used across the sector. In its 2019 End of Cycle Report: Unconditional Offers – the Applicant Experience, UCAS revised its categorisation of the different types of unconditional offer. See https://www.ucas.com/file/292761/download?token=f9VG3j9z [PDF]

[63] Unconditional offer: Serving the interests of students? January (2019). See https://www.officeforstudents.org.uk/media/7aa7b69b-f340-4e72-ac0f-a3486d4dc09a/insight-1-unconditionaloffers.pdf [PDF]

[64] (1) UCAS End of Cycle 2019 insight report: unconditional offers – the applicant experience. See https://www.ucas.com/file/292731/download?token=mvFM1ghk [PDF] (p.3-4)

(2) In 2019, UCAS revised its categorisation of the different types of unconditional offer. For further information about its 2019 approach, see https://www.ucas.com/file/292761/download?token=f9VG3j9z [PDF]

104. UCAS is now forecasting a significant reduction (up to 75 per cent) in the number of providers making conditional unconditional offers in 2020.[65] We welcome this early forecast but note that we will have to wait until summer 2020 to have the full picture of how providers' offer-making behaviours have changed. We also note that UCAS has revised its categorisation of the different types of unconditional offer and that the forecast reduction in 'conditional unconditional' offers refers to offers which are identified through the UCAS offer process and does not take into account conditional unconditional offers which are communicated directly to applicants.[66]

105. This rise in unconditional offer-making has been one of the more controversial features of the English higher education admissions system in recent years. It has been the subject of significant media interest, provoking teachers and others in education to argue that it limits students' ambitions and achievements and discourages informed choice. In a 2019 report from the Policy Exchange, both teachers and students cited the demotivating effect that unconditional offers can have.[67] Conversely, there is anecdotal evidence that others, including many of the applicants who receive these offers, may see them as a positive development.

106. OfS and UCAS analysis supports the concern that unconditional offers lead to an increased risk of reduced academic attainment at Level 3 and beyond. Applicants with unconditional offers were 11.5 percentage points more likely to miss their predicted grades by three or more grades than their peers with conditional offers.[68] In a recent student polling exercise conducted as part of the UUK fair admissions review, 50 per cent of applicants who had accepted an unconditional offer agreed with the statement that 'my offers made me complacent in studying for exams' (compared to 55 per cent of all respondents who had accepted any sort of offer). 77 per cent of those who had accepted an unconditional offer agreed with the statement that 'my offers motivated me to work harder' (compared to 82 per cent of all respondents who had accepted any sort of offer).[69]

107. Further analysis in October 2019 indicated that non-continuation rates were higher (0.65 percentage points) for students who accepted unconditional offers than would have been expected if they had accepted conditional offers.[70] It has also been shown that applicants from the areas with the lowest rates of participation in higher education are more likely to receive an unconditional offer. These students are more likely to be the first in their family to attend university and therefore also more likely to have less support in their decision-making process. The full impact of unconditional offer making is still unknown but there are early

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[65] See https://www.ucas.com/corporate/news-and-key-documents/news/ucas-forecasts-conditional-unconditional-offers-will-significantly-decline-2020

[66] In 2019, UCAS revised its categorisation of the different types of unconditional offer. See https://www.ucas.com/file/292761/download?token=f9VG3j9z [PDF]

[67] See https://policyexchange.org.uk/its-time-to-get-serious-about-rebalancing-post-18-education/ (p.27-35)

[68] See https://www.ucas.com/file/292731/download?token=mvFM1ghk [PDF] (p.7)

[69] See https://www.universitiesuk.ac.uk/news/Pages/Filling-careers-advice-gaps-would-make-university-applications-fairer.aspx (p.15)

[70] Update to data analysis of unconditional offers: Relationship with transition to entering higher education and continuation of studies into the second year, OfS, October 2019. See https://www.officeforstudents.org.uk/media/8eb6345f-d106-432e-99f8-babd53182a5d/unconditional-offers-data-analysis-update.pdf [PDF]

indications that it is not working in the best interests of students who receive such offers. Furthermore, some universities have publicly stated that they will end the practice, citing the potential negative impact this type of offer can have.

108. The OfS has made clear that we are concerned about the rise in unconditional offer making, particularly the rise of conditional unconditional offers, which may constitute pressure selling. The use of unconditional offers may also be anti-competitive; providers that have decided not to use them because they consider that they do not work in students' best interests, may attract fewer applications and so recruit fewer students, compared to providers that do use them.

109. We are interested to hear about what types of unconditional offers respondents see as appropriate or inappropriate and about the impact that unconditional offers are having on applicants' ability to make well-informed decisions about what and where to study.

**For all**

**Question 38:** Is the growth in the use of unconditional or attainment offers in recent years, a problem?

**Question 39:** Are there some types of unconditional or attainment offer that you consider to be more or less appropriate than others?

**Question 40:** Does the use of unconditional or attainment offers affect applicants' ability to make well-informed decisions about what and where to study?

**For applicants, students or student groups**

**Question 41:** In your experience or that of others, does the receipt of an unconditional or attainment offer impact the behaviour of applicants?

**For staff working in schools or colleges**

**Question 42:** Do you think that the receipt of an unconditional or attainment offer impacts the behaviour of applicants?

**For staff working in providers**

**Question 43:** Does your provider make unconditional or attainment offers to some applicants? If so, for what reasons and on what basis?

**Question 44:** If your provider stopped making unconditional or attainment offers, or some types of unconditional offer (such as 'conditional unconditional' offers), what impact would that have on your provider, if any? Would any such impact be different if other providers also stopped making such offers?

## Issue six: the use of offer incentives, inducements and false marketing claims

110. The OfS would like to hear the views of a range of stakeholders in relation to the use of offer incentives and inducements. In particular, the OfS would like to hear the views of **UK and EU domiciled** and **international students**, on **all levels** of higher education course, **part-time** or **full-time**, undertaking any **pattern of delivery** who may have received these types of offer. We are also interested to understand what **stakeholders** would regard as appropriate and inappropriate practice in relation to offer incentives and inducements.

111. In 2019, a UCAS survey of 30,000 applicants found that 30 per cent had received an offer with a guaranteed place in university halls and 17 per cent had received an offer with some form of scholarship, bursary or cash payment.[71] Beyond this, there have been numerous media reports of incentives being offered to students through 'clearing bursaries' or other forms of inducement.[72] Anecdotal evidence also suggests that some providers may use interviews as a 'conversion tool'; that is, as an opportunity to engage with applicants and then to make them a lower offer, rather than as a genuine tool for assessing applications.

112. There is also some anecdotal evidence which suggests that some providers seek to improve their progression rates by offering discounted fees for postgraduate study, to their existing undergraduate students. This may be of concern if the offer of discounted fees leads students into making choices about postgraduate study which are not in their best interests.

113. This issue is also of broader scope. For example, in recent years, some providers have been criticised by the Advertising Standards Authority (ASA) for making marketing claims about their league table or other rankings which the ASA considered to be misleading. The ASA has published guidance for providers about making such 'comparative' claims which notes that 'it is important that advertisers do not make claims which could mislead would-be students into making the wrong decision'.[73]

114. In our 2019 Annual Review, the OfS raised concerns about inappropriate marketing and inducements that could mislead students at a time when they may be especially vulnerable.[74] Higher education providers must comply with consumer protection law. The OfS's conditions of registration require registered providers to demonstrate that, in developing their policies, procedures and terms and conditions, they have given due regard to relevant consumer protection law guidance (Condition C1).[75] Making misleading marketing claims or any form of inducement, such as a bursary or cash payment or a promise of accommodation, could result in applicants making decisions which are not in their best interests. This may include inducements to accept a place and, in circumstances such as where more students have accepted an offer than the provider has places, inducements then to defer a place.

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[71] See https://www.ucas.com/file/292731/download?token=mvFM1ghk [PDF] (p.7)

[72] See https://www.bbc.co.uk/news/newsbeat-49369042

[73] See https://www.asa.org.uk/advice-online/universities-comparative-claims.html

[74] See www.officeforstudents.org.uk/publications/english-higher-education-2019-the-office-for-students-annual-review/ (p.12)

[75] See the OfS's regulatory framework at www.officeforstudents.org.uk/publications/securing-student-success-regulatory-framework-for-higher-education-in-england/

115. There is relatively little evidence regarding the scale and nature of this issue, or on the impact that it has on applicants. The OfS has been clear that it would be a concern if inducements caused applicants to make decisions that may not be in their best interests.

**For all**

**Question 45:** Are offers which have some sort of incentive or inducement attached, a problem?

**Question 46:** Are there some situations in which you consider the use of incentives or inducements to be more or less appropriate than others?

**Question 47:** In what ways do false marketing claims or offers with incentives or inducements influence the behaviour of applicants?

**Question 48:** Do some types of marketing claim, incentive or inducement seem to have greater influence on the behaviour of applicants than others?

**For staff working in providers**

**Question 49:** Does your provider make offers which have some form of incentive or inducement attached to them? If so, what sort of incentives or inducements do you offer and why?

**Question 50:** If your provider does not make offers with incentives or inducements attached, please explain why.

## Post-results stage

### Issue seven: Applications which are made later in the admissions cycle, including the use of the UCAS Clearing system

116. We would like to explore the ways in which admissions processes operate where applicants make their applications later in the admissions cycle, and to understand stakeholders' views of this.

117. This issue is particularly relevant to the UCAS admissions system for **full-time undergraduate** admissions, where applicants may use the 'Clearing' system. However, we are also interested to explore the extent to which this issue impacts the wider admissions system; for example, where applicants apply directly to a provider, shortly before (or sometimes, just after) a course commences.

118. Clearing is a service available through UCAS for applicants to apply for higher education courses between July and October in the year of entry, rather than in the initial application window that opens in the year before entry and runs from May to the following June. Clearing can be used by applicants who did not receive any offers (or offers they wanted to accept) in their initial applications, or who did not meet the conditions of their offers after receiving their results. In addition, Clearing is also available to applicants who did not apply at all during the initial application cycle and to those who choose to decline their place and to search elsewhere instead. Adjustment is a separate service that allows applicants who have exceeded the conditions set by their firm choice providers to look for an alternative course. Unlike Clearing, Adjustment can be used to explore other options while retaining the place already secured.

119. In 2019, 73,320 applicants used Clearing to secure a place, a rise of 10 per cent in a year and a record high. The numbers of applicants using Clearing have nearly doubled since 2006; in 2019 13.5 per cent of students secured a place on their course through Clearing. Similarly, over the last decade or so, there has been a large growth in the numbers of providers using Clearing. In recent years, 'selective' providers with high entry requirements have developed a significant presence in Clearing.

120. Of the 73,320 applicants using Clearing in the 2019 cycle, 19,640 applied directly through Clearing without having applied earlier in the admissions cycle.[76] UCAS has published data on acceptances for the 2019 cycle which suggests that applicants applying directly to Clearing tend to be **mature students**. Anecdotal evidence also suggests that those applicants are more likely to apply for vocational courses, at providers which have lower entry

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[76] UCAS End of Cycle Report 2019: Chapter 3: Clearing. See https://www.ucas.com/file/292746/download?token=8jCXsYVh [PDF]

grade requirements and that they tend to study locally.[77] This small but growing minority of applicants could be considered to be making 'post-qualifications applications'.

121. Adjustment is becoming less popular, possibly due to Clearing now having a 'self-release' function which allows applicants with a confirmed place to release themselves into Clearing rather having to wait for the relevant provider to release them; in the 2019 cycle, only 590 people were placed through Adjustment a decrease of 33 per cent on the previous year.[78]

122. Clearing has previously been described as a 'sub-optimal' admissions process that puts both applicants and higher education institutions under severe pressure' (UCAS, 2011).[79] Then, in 2012, UCAS committed to replacing Clearing, 'with a fair and managed process for applicants who have not been accepted through the earlier process and those who, for various reasons, prefer to apply later in the cycle and/or after receiving their results'.[80] Since then, UCAS has introduced a number of changes to the Clearing service, including the introduction of the self-release function referred to above and a 'direct contact' service, which enables providers to make direct contact with unplaced applicants (who have opted in). UCAS has also improved the search function, with more advanced filtering, and enhanced data reporting, including by introducing a daily Clearing analysis. UCAS has also recently announced the launch of 'Clearing Plus' for the 2020 admissions cycle. This is intended to be a more targeted version of the 'direct contact' service, which it will replace, and will allow providers to further define the student groups with whom they wish to engage. Through Clearing Plus, applicants may receive offers at the same time as they are recorded as being 'unplaced' in the UCAS system.

123. However, anecdotal evidence suggests that some stakeholders perceive the current Clearing arrangements as a system which puts applicants and higher education providers under pressure. This includes time pressure, as there is not much time during the Clearing process for applicants or providers to make decisions. There may be other pressures too. The Clearing process is less systematic than the main UCAS application process; Clearing decisions may be made through UCAS or directly with applicants, often over the telephone, and providers' requirements can vary hugely.[81] This may create uncertainty with applicants feeling under pressure to accept the first Clearing offer that they receive, at a time when less support may be available for applicants whose school is their main source of support because the decisions are being made during the summer holidays. Providers may feel under pressure to fill places that would not otherwise be filled, and therefore to make offers to applicants who may not be best suited to the course or provider.

124. Clearing may also present potential issues of inconsistency in admissions, whereby applicants applying in the earlier cycle are held to different admissions standards than those

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[77] (1) See https://www.ucas.com/data-and-analysis/undergraduate-statistics-and-reports/ucas-undergraduate-sector-level-end-cycle-data-resources-2019

(2) We are keen to learn more about this group of applicants and may create and publish additional evidence, as part of this review.

[78] See: https://www.ucas.com/file/292736/download?token=xurFczbC [PDF]

[79] See Admissions Process Review October 2011: https://www.ucas.com/file/956/download?token=y8EovXLo [PDF]

[80] See Admissions Process Review Findings and Recommendations March 2012: https://www.ucas.com/file/776/download?token=6U_CIbPI [PDF]

[81] In either case, the Clearing choice would need to be formally processed via UCAS.

who apply through Clearing. Applicants applying through Clearing may also have more difficulty in securing accommodation (whether provider-owned accommodation or private accommodation) than applicants who were offered a place earlier in the application cycle. In addition, there may be issues of transparency, with Clearing working in the interests of applicants and advisers who know how to navigate the system. For example, an applicant or adviser who has contacts or experience in the higher education sector may be better able to direct applicants towards providers and courses that they know are under-subscribed. Furthermore, advisers with experience working with certain providers may know the best ways to contact certain providers, whether this is by phone call, email, or the use of self-release in UCAS system. This could potentially disadvantage applicants who have less understanding of the process or who do not have knowledge of, or connections to, other providers. Furthermore, some stakeholders have raised fears that offers made through Clearing, especially in combination with inducements such as bursaries, could lead to applicants making decisions under undue pressure that are not in their long-term interests. We would like to explore these issues in more detail through our review.

125. Clearing is, however, viewed by some stakeholders as a valuable service, allowing applicants a wide range of additional choices and the ability to 'swap' at a later stage, with the benefit of having had additional time to consider their options. Applicants who apply for the first time during Clearing are potentially able to reduce the time spent on their applications significantly and to accelerate the speed of decisions from providers they apply to. An additional possible benefit for this group of applicants is that, having received the results of their Level 3 qualifications, such as A-levels or BTEC, their applications are made on the basis of known results rather than predicted grades, the latter of which can often be inaccurate (see **issue two**).

126. In **issue one** above, we refer to the use of integrated foundation years (Year 0) and note concerns that these may be being used to 'entice' students who would not otherwise meet the entry criteria.[82] Under that issue, we ask stakeholders what they perceive to be the advantages and disadvantages of integrated foundation years. We would also like to understand whether applicants are more likely to undertake an integrated foundation year if they secure a place through Clearing.

127. It is important to note that the dynamics of the current issues surrounding Clearing may well shift in the coming years as the number of 18-year-olds is set to increase, and it is not clear whether there will be a commensurate rise in higher education places. This may mean that entry to higher education becomes less of a 'buyer's market' (where applicants are in high demand and supply of places on higher education courses is plentiful) and, as a result, there may not be the same level of choice and opportunity available to applicants through Clearing.

128. The OfS would like to hear views from a range of stakeholders about the effectiveness of the Clearing process. In particular, we are keen to hear from **applicants (UK and EU domiciled and international)** who have used the Clearing service without having made an application earlier in the application cycle.

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[82] See the report from the Independent Review of Post-18 Education and Funding, chaired by Dr Philip Augar, May 2019:
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/805127/Review_of_post_18_education_and_funding.pdf [PDF] (p.10)

129. We would also like stakeholders to tell us their views on the extent to which the issues mentioned above in relation to the Clearing system might impact the wider admissions system; for example where applicants apply **directly** to providers for **part-time** or **postgraduate** courses or for full-time courses where providers do not use the UCAS admissions system, later in the admissions cycle. We note that many providers do not recruit students on an academic year basis; some have more frequent entry points, for example on a semester basis, and others operate a system of rolling recruitment. Therefore, 'later in the admissions cycle' will have different meanings for different providers, depending upon their model.

**For all**

**Question 51:** What do you think are the advantages and disadvantages of the existing Clearing system?

**Question 52:** Does Clearing work in the interests of applicants who use the UCAS admissions system?

**Question 53:** Where applications are made outside of UCAS: please describe the challenges, if any, that you think 'later' applications (those made towards the end of the application cycle, or after a course has started) create for applicants, higher education providers or other organisations?

**For applicants, students or student groups**

**Question 54:** Why do some applicants delay their applications until Clearing?

**Question 55:** Where applications are made outside of UCAS: Why do some applicants apply 'later' in the applications cycle (including after the course has started)?

**For staff working in schools or colleges**

**Question 56:** Please describe the challenges, if any, that you think the existing Clearing system creates for schools or colleges.

**Question 57:** What support, if any, does your school or college offer to students using the Clearing system?

**For staff working in providers**

**Question 58:** Please describe the challenges, if any, that you think the existing Clearing system creates for providers.

## Cross-cutting issues

### Issue eight: the transparency of the admissions process

130. Transparency underpins a reliable, fair and inclusive admissions system. Conversely, a lack of transparency risks undermining the reliability, fairness and inclusivity of the system. Through this consultation, the OfS would like to explore stakeholders' perceptions of the extent to which the admissions system is transparent, i.e. how easy or otherwise the admissions system is for applicants to understand and use.

131. Transparency is referenced throughout the other issues in this consultation. For example, under **issue one**, we would like to gather evidence about the apparent disparity between advertised and actual entry requirements. Under **issue three**, we would like to explore how different assessment methods are used within the sector and whether these are understood by applicants. The Sutton Trust's 2017 study noted that many applicants do not fully understand the 'rules of the game' in admissions processes.[83] Under **issue four**, we reference evidence which suggests a need for clearer communication about how providers are making use of contextual admissions. Under **issue seven**, we note potential transparency issues around the operation of the Clearing system such as whether applicants - and their advisers – who understand how to navigate the system are at an advantage.

132. In framing the issue of transparency at the **pre-application stage**, we are particularly interested to hear evidence relating to how transparent admissions processes are for students at the outset of an application. We would like to hear from applicants of all ages who are making (or have made) applications **directly** to a provider, such as for **post-graduate, part-time, distance** or **work-based learning**, as well as applicants using the UCAS admissions system. We are also interested in the experiences of **international students** who may be working with recruitment agents through their application.

133. For **full-time undergraduate applicants** using the UCAS system, the OfS would like to explore whether it is made clear and transparent to applicants how their applications are handled. For example, we are keen to hear from applicants about whether they understand or would like to know about the way in which predicted grades, personal statements and references will be used by providers they apply to. Additionally, we are keen to understand what sort of contextual information is taken into account by providers when assessing applications and the circumstances in which unconditional offers might be made.

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[83] Rules of the Game: Disadvantaged Students and the university admissions process, Gill Wyness, December 2017 (The Sutton Trust). See https://www.suttontrust.com/wp-content/uploads/2017/12/Rules-of-the-Game.pdf [PDF] (p.4)

134. Less is known about the experiences of applicants who apply **directly** to providers such as the majority of those applying for **part-time** or **postgraduate** provision.[84] The lack of information about part-time students was noted in the 2004 Schwartz review and remains today.[85] We are particularly keen to understand the extent to which stakeholders consider the **direct applications admissions system** to be transparent; a system about which there is not much evidence available.

135. There may also be issues of transparency around admissions processes where **more than one provider or organisation** is involved in the admissions process, for example where providers deliver learning opportunities together under a **partnership arrangement** or where providers work with employers to deliver **higher** or **degree apprenticeships** or other **work-based learning** in the **higher education context**.[86] However, as explained above, a detailed consideration of partnership arrangements is beyond the scope of this review.

136. Another issue of transparency in admissions which we would like to explore through this consultation is the use of recruitment agents, in relation to the recruitment of **UK and EU domiciled** students and **international** students.

137. Though most English higher education providers now use agents to recruit **international students**, relatively little is known about the role that recruitment agents play in supporting their admissions strategies. Furthermore, as noted by the British Council, there is not a national framework or set of regulations governing the way universities work with international recruitment agents.[87] One recommendation from the British Council report is that providers should ensure 'greater transparency about university-agent relationships and the basis on which advice by agents is given'.

138. In 2017, a BBC Panorama programme investigated the use of education agents who were recruiting bogus students to courses at Levels 4 and 5, such as Higher National Certificates and Higher National Diplomas, at some providers so that they could claim student loan funding that they were not entitled to.[88]

139. Some of the issues that relate to transparency about the role of recruitment agents, for **UK and EU domiciled** students and **international** students, include:

   • Transparency about the ways in which recruitment agents are used by different providers

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[84] Data published by HESA indicates that, for the academic year 2017-18, 46 per cent of entrants to higher education in England were not full-time undergraduate students. See https://www.hesa.ac.uk/data-and-analysis/sb254/figure-16. This does not include providers that do not return data to HESA.

[85] See paragraph A5: https://dera.ioe.ac.uk/5284/1/finalreport.pdf [PDF]

[86] For example, many further education colleges and independent providers deliver higher education courses which lead to the award of a qualification by a university. The Association of Colleges (AoC) has published guidance for further education colleges which deliver higher education, noting that under some arrangements the college and awarding university are both involved in admissions processes. See https://www.aoc.co.uk/sites/default/files/College_HE_Guide.pdf [PDF]

[87] See https://www.britishcouncil.org/sites/default/files/managing_education_agents_report_for_bc_2.pdf [PDF]

[88] See https://www.bbc.co.uk/news/uk-41966571

- Transparency about the way in which recruitment agents are funded by providers, for example whether this is by flat fee or whether commissions/bonuses are paid depending on the number of students recruited through the agent

- Applicants' awareness of the role and motivations of recruitment agents and how their work is funded, especially where their role is framed as advisory

- Transparency about the ways in which applications handled by recruitment agents are processed by providers

140. The quality and availability of information and guidance for applicants is central to any consideration of transparency in the admissions system. Through this consultation, we are seeking views about the extent to which applicants understand parts of the system and about their perceptions of the fairness of the system. However, an appraisal of the overall information, advice and guidance which is available to applicants in relation to the admissions system is beyond the scope of this review. The reasons for this are outlined under **issue one,** above.

141. Fairness and transparency of processes and procedures is a fundamental tenet of consumer protection law. Higher education providers must comply with consumer protection law. The OfS's conditions of registration require registered providers to demonstrate that, in developing their policies, procedures and terms and conditions, they have given due regard to relevant consumer protection law guidance (Condition C1).[89] In recent times, there has also been much debate across the sector about the development of student contracts. We are developing our policy in this area and will be publishing more information about our approach this year.

142. The OfS's existing work on consumer protection will inform our admissions review and, therefore, we will not consider consumer protection issues in this consultation.

**For all**

**Question 59:** Is the admissions process for English higher education transparent?

**Question 60:** Is there transparency in how applications are handled when they are made directly to providers, rather than through UCAS?

**Question 61:** Do you think that the role of recruitment agents in the admissions process, including how they are funded, is transparent?

**For applicants, students or student groups**

**Question 62:** Do applicants understand how providers will assess their applications?

**Question 63:** Do applicants understand how recruitment agents work, including how they are funded and how providers handle applications which are made through agents?

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[89] See the OfS's regulatory framework: www.officeforstudents.org.uk/publications/securing-student-success-regulatory-framework-for-higher-education-in-england/

**For staff working in providers**

**Question 64:** What steps does your provider take to ensure that your admissions processes are transparent and understood by all applicants and their advisers?

**Question 65:** Does your provider use recruitment agents to recruit students?

**Question 66:** If your provider does use recruitment agents, please explain how it works with those agents, including whether their role is framed as advisory, and how they are funded.

## Issue nine: Applicants' experience of the admissions process

143. This review seeks to advance understanding of issues in the admissions system for **all types of students** on **all types of higher education courses**. This means that a **broad range of courses** leading to qualifications at **Levels 4 and 5, undergraduate** and **postgraduate (taught and by research)** are all in scope, together with **part-time** and **full-time** modes of study and different patterns of delivery such as **distance learning** and **work-based learning** including **higher** and **degree apprenticeships**.[90] Similarly, **UK and EU domiciled** and **international, young** and **mature** applicants are included in our review.

144. As well as seeking responses in relation to the specific issues identified in this review, we are interested in hearing about applicants' experiences of the English higher education admissions process, in general. We would like to hear from **students** who have recently been through the application process, either through the **UCAS system** or by **direct application** to providers and from **applicants** who, for whatever reason, **did not then go on to study** in English higher education. In a recent student polling exercise, conducted as part of the UUK fair admissions review, 8 per cent of applicants said that they did not accept any of the offers that they had received. Of those who had accepted an offer, black, Asian and minority ethnic (BAME) students were twice as likely as white students to say that they had not, or had not yet, started their accepted course (20 per cent versus 10 per cent respectively).[91]

145. In the same polling exercise, seven out of ten recent applicants considered the application process to be fair, one in ten said it is unfair and one in five said it is neither fair nor unfair. However, only 62 per cent of BAME applicants perceived the process to be fair, compared to 73 per cent of white applicants.[92]

146. The UCAS data for the 2020 admissions cycle, up to the 15 January deadline, indicates that there are gender and regional disparities in 18-year-old application rates for higher education. The data indicates that women are now 1.41 times more likely than men to apply to higher education by the January deadline. The data also shows that 53 per cent of 18-year-olds in London had applied by the 15 January deadline, a significantly higher proportion than from other regions, with the North East and the South West having the lowest proportion of 18-year-olds applying (at 34 per cent each).[93] We are interested in hearing applicants' views on whether there are aspects of the admissions system that may contribute towards these disparities.

147. We recognise that applicants' individual experiences may be shaped by different factors, many of which are personal to them. This review is not focusing upon a particular group of applicants or prospective applicants. Furthermore, the specific requirements of English language tests and visa requirements which international students may face, are beyond the scope of this review.

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[90] Including Foundation degrees, Higher National Certificates and Higher National Diplomas

[91] See https://www.universitiesuk.ac.uk/news/Documents/uuk-perceptions-fairness-comres-research.pdf [PDF] (p.13)

[92] See https://www.universitiesuk.ac.uk/news/Documents/uuk-perceptions-fairness-comres-research.pdf [PDF] (p.8)

[93] See https://www.ucas.com/file/314866/download?token=jF_H0KfT [PDF]

**For applicants, students or student groups**

**Question 67:** Please provide a brief description of your overall experiences, or the experiences of others, of the admissions process that you (or they) went through, highlighting any advantages or disadvantages in the process.

**Question 68:** Are there barriers in the admissions system which prevent applicants from participating in courses which are best suited to them?

**Issue ten: Stakeholders' perceptions of the extent to which the English higher education admissions system is reliable, fair and inclusive**

148. Aspects of the admissions system have been the subject of considerable media scrutiny and debate in recent years. Questions have been raised over the fairness of the system and whether it acts in the interests of applicants and students. In this consultation, we have identified a number of issues and included some specific questions in relation to each issue to help to structure responses.

149. We want to understand more about stakeholders' overarching perceptions of the extent to which the admissions system is fair and effective and their perceptions of the level of public confidence in the system. Currently, there is limited evidence regarding the levels of public trust in the admissions system but the annual tracker of markets that the public most trust and mistrust, published by Which?, found that universities as a whole were trusted by 38 per cent of respondents.[94] This was about the same level of trust as that commanded by broadband or home phone services.

150. Under **issue nine** above, we are asking **applicants** to tell us about their own experiences of the admissions system. We would also like to hear from them about their wider perceptions of the fairness and effectiveness of the existing admissions system. We are also keen to hear the views of a wide range of **other stakeholders** including **students, parents** and **carers, schools** and **colleges, English higher education providers, employers, sector bodies** and other **policy bodies** and **third sector organisations** which have an interest in the English higher education admissions system.

151. Over recent years, there has been a growth in 'league tables', which purport to measure the quality of provision at higher education providers, and universities in particular. League tables are widely published in the media and have been the subject of much debate. The OfS notes that league tables influence public perceptions of the quality of providers and drive the behaviour of both applicants and providers. For example, anecdotal evidence suggests that some providers may be dissuaded from accepting students with lower grades, through contextual admissions, as it may influence their 'scores' on the entry qualifications measure which is included in many league tables.

152. Through this review, we would like to understand more about stakeholders' views on league tables. Any evidence that we obtain through this review, will then inform our further thinking as we develop our policy in this area.

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[94] See
https://consumerinsight.which.co.uk/tracker/trust_public?search%5Bdate_from%5D=1907&search%5Bdate_to%5D=1811&search%5Bsort_by%5D=unsorted

**For all**

**Question 69:** Overall, do you think that the admissions system for higher education in England is reliable, fair and inclusive and works in the interests of all applicants?

**Question 70:** What impact do league tables have on providers' approach to admissions, if any?

## Any other issues

153. In this consultation document, we have brought together ten issues for discussion. However, respondents are also invited to put forward any further issues which they consider to be pertinent to our review of the admissions system in English higher education.[95]

**For all**

**Question 71:** Are there any other issues which you think we should address in our review of the English higher education admissions system?

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[95] Please note that there are several issues which we consider to be outside the scope of this review. These are set out in Table 2 in the Issues section.

# Future options

154. As we conduct our review, we are taking an open-minded stance so that we are well-placed to assess and evaluate a wide range of perspectives. We are not setting out with a series of specific changes to the admission system in mind. As explained above, when we have completed our review, we will publish findings along with supporting evidence and our views about any need for future changes.

155. As part of this consultation we are seeking views on some of the future options that have been proposed by different stakeholders in recent years. We have mapped out three broad future models **(Options 1, 2 and 3),** highlighting some of the implications of a move to each of these models. These options primarily focus on the admissions system for full-time undergraduate admissions, although we are also interested in stakeholders' views on their wider application to (and potential impact on) the rest of the admissions system.

156. These options are not intended to be exhaustive and respondents are invited to suggest additional or alternative future options for reform of the admissions system, or to argue for no changes at all. The **'Other options'** section is an opportunity to consider other models. In particular, stakeholders are invited to suggest options for reform to the admissions process for **international** (as far as this process is different), **postgraduate** and **direct-entry** applicants – applicant groups for whom there is less evidence and discussion.

157. A summary of these future options is given below, followed by a more detailed account of each option. In **Annex B**, we have also mapped Option 1 'retaining the existing system with reforms' and Options 2 and 3 (post-qualification offers and applications) against some of the ten issues set out in this document. Annex B is not an exhaustive analysis or modelling of the impact of future changes. Our aim is to suggest some of the possible consequences of the future options, to stimulate further debate and to highlight points which respondents may wish to consider when framing their responses to this 'future options' section.

| Future option | Brief summary |
|---|---|
| **Option 1**<br>Retain existing system with reforms | If evidence from this review suggests that the admissions system is mostly functioning well in the interests of students then maintaining it, with reforms, may make sense.<br><br>Some examples of reforms that could address some of the issues we have identified are set out below:<br><br>• Increase number of entry points to higher education<br><br>• Greater transparency about entry requirements and the application assessment process.<br><br>• Removing or reforming the requirements for personal statements and/or references.<br><br>• Improving the accuracy of predicted grades or removing their use.<br><br>• Limiting the use of unconditional offers, including by the use of the OfS's enforcement powers where it judges there to have been a breach of one or more conditions of registration. |

| | |
|---|---|
| | • Removing the use of incentives and inducements which may lead applicants to make decisions that are not in their best interests, including by the use of the OfS's enforcement powers where it judges there to have been a breach of one or more conditions of registration. |
| | • Further progress in the use of contextual admissions and threshold entry requirements. |
| | • Reforming the Clearing system e.g. to require providers to withhold a certain number of places for allocation through Clearing. |
| | Reforms could be ambitious in scope and other, more fundamental, changes could also be made within the existing admissions framework, for example, by introducing some form of national aptitude testing or further national subject-related entry tests, rather than using predicted grades. |
| | In **'Other options'** below, we are also asking stakeholders to suggest further changes that could be made to the existing wider admissions system, for example for direct applications. |
| **Option 2**<br><br>Post-qualifications offers for full-time undergraduate admissions | An admissions system featuring post-qualifications offers (PQO) for full-time undergraduate admissions could be structured in different ways. We have set out one approach below:<br><br>• Broadly, existing deadlines for initial applications would be retained<br><br>• Predicted grades would remain, although the ways in which they are arrived at and used could be reformed.<br><br>• Applications would be sent to providers in largely the same way and at the same time as under the current system.<br><br>• **Offers are only made to applicants <u>after</u> Level 3 results are known.**<br><br>• Applicants accept their preferred offer or, through an amended version of Clearing, search for alternative courses or providers.<br><br>• New applicants can enter the process – submit initial applications – at the Clearing stage, although the Clearing system would be reduced from that which currently exists.<br><br>• There could be some changes to dates for the release of Level 3 results and/or the start of the traditional academic year. |
| **Option 3**<br><br>Post-qualification applications for full-time undergraduate admissions | An admissions system using post-qualifications applications (PQA) for full-time undergraduate admissions could be structured in different ways. We have set out one approach below:<br><br>• Applicants use the year before entering higher education to research and consider their higher education options. This would include considering whether higher education is the right option as well as course choice and preferred providers.<br><br>This includes online research, possible provider visits and, potentially, structured national information, advice and guidance (IAG) activities. |

| | |
|---|---|
| | <ul><li>Applicants may register interest in certain providers and prepare materials for their full application. Applications could be submitted to an admissions service without being finalised or shared with any providers.</li><li>Applications would not use predicted grades and the personal statement and academic reference systems could be reformed.</li><li>**Applications are finalised and shared with providers shortly after Level 3 results are known.**</li><li>Applicants receive decisions from providers in the weeks after applications are made and finalise their choice before the start of the academic year.</li><li>Applications can be made at any point by those who already have their Level 3 qualifications.</li></ul>**Note:** for this model to be implemented, it is likely that the timings of different parts of the education system would need to change. For example, Level 3 examinations could finish a few weeks earlier, the announcement of results could also be made earlier and the start of the first academic year could be moved slightly later. In addition, the student finance system would need to be reformed in order to accommodate later finance applications. |
| **Other options**<br>Other models | We are also inviting respondents to tell us about:<ul><li>Any other models or approaches, other than those discussed above, that they consider could improve the admissions system for full-time undergraduates</li><li>Whether aspects of options two and three above could be used for the wider admissions system</li><li>Any other models or approaches to higher education admissions that they consider to be relevant.</li></ul> |

158. Existing evidence, summarised in this consultation, suggests that there are issues in the current admissions system; in particular, for **full-time undergraduate applicants** about whom much more is currently known. Further issues may come to light through this review, including in relation to the admissions processes for **other applicant groups** and for **other modes of study**.

159. If the evidence from this review suggests that the existing system is mostly functioning well, then maintaining it may make sense. Not making wholesale changes would avoid the risk of unintended consequences which might result from more radical structural changes. With reforms, some of the issues that are identified could be partially or fully addressed. We have summarised a range of potential reforms below; some involve getting rid of elements of the existing system, others involve improving or developing existing elements. Reforms could be ambitious in scope. UCAS is also undertaking reforms to improve the current system, some of which are mentioned below.

160. Many providers now offer multiple-entry points to full-time undergraduate students, giving them more choice about when to start their studies. However, some providers, including many universities, operate on an academic year basis and only admit new full-time undergraduate students at the start of each academic year. Some stakeholders have advocated for a multiple-entry point system across the higher education sector, to promote student choice. For example, an additional February/March entry point may be attractive to some students who are not able to (or do not wish to) take a full 'gap' year after completing their Level 3 studies, but who would like to take some time out before starting higher education to undertake some relevant work experience.

161. Existing evidence suggests a lack of transparency about entry requirements and the admissions process. In particular, some stakeholders have highlighted a disparity between advertised entry requirements and actual entry requirements and have also questioned the accuracy of predicted grades. Concerns around predicted grades may be difficult to address within the current system; although, in its End of Cycle Report 2019, UCAS notes that it is actively working with schools and colleges to improve the accuracy of predicted grades and is also exploring how advanced modelling based on information about the previous achievement of a student, such as GSCE grades and their context, could create a data-driven addition or alternative to predicted grades.[96]

162. Other reforms could, for example, replace predicted grades altogether by expanding the current system of national subject-related tests or by implementing a system of national aptitude testing.[97] Those reforms could be made within the framework of the existing system

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[96] UCAS End of Cycle Report 2019, Chapter 8, 'Qualifications'. See https://www.ucas.com/file/292726/download?token=wswAnzge [PDF]

[97] Some subject-related aptitude testing already exists, for example the University Clinical Aptitude Test (UCAT) and the BioMedical Admissions Test (BMAT) which some UK universities use as part of their selection process for medicine and dentistry programmes. The Universities of Oxford and Cambridge also set a number of subject-based admissions tests as do some other providers. The UCAS website has more information on these tests: https://www.ucas.com/undergraduate/applying-university/admissions-tests

although there may be an impact on the overall timescales within the admissions process and on the timings and structure of the Level 3 qualification years.

163. The evidence to date suggests that use of unconditional offers has increased significantly in recent years; in this consultation we have summarised concerns around that increase.[98] Providers could sign up to a voluntary code to limit the use of unconditional offers in particular circumstances. However, the OfS has said that it will use its enforcement powers where it judges there to have been a breach of one or more conditions of registration.

164. Existing evidence also suggests that disparities in the levels of support available to different applicants, along with some of the requirements for personal statements and academic/practical references, may disadvantage some applicant groups. Personal statements and references may not currently be used as a effectively as they could be; with applicants (and referees) being put off from mentioning sensitive issues in case they jeopardise the application. Through this consultation, we are also exploring providers' use of other assessment methods, such as examinations, interviews and auditions, and applicants' understanding of how those methods are used. If the evidence indicates that there are concerns in these areas, the requirements for personal statements and/or references could be reformed or removed and/or reforms to the way in which other assessment methods are used could be implemented. Reforms could also improve transparency around how the various admissions assessment methods are used.

165. The OfS takes the view that contextual admissions, where providers assess applicants' merit and potential in light of their individual circumstances, should be further developed under the current admissions system. Possible reforms could include asking providers to sign-up to a code of practice on contextual admissions which might involve a commitment to publish a minimum entry tariff for applicants from disadvantaged backgrounds or under-represented groups.

166. Under **issue seven**, we consider evidence which suggests that the existing system of Clearing may put applicants and providers under pressure, and may present potential issues of inconsistency in admissions, whereby applicants applying in the earlier cycle are held to different admissions standards than those who apply through Clearing. Potential reforms could include requiring providers to withhold a certain number of places for allocation through Clearing.

167. Through this consultation, we would like to explore the use of incentives and inducements amid concerns that these may lead to applicants making decisions that are not in their best interests. Through reforms to the existing system, progress on dealing with inducements could be made. The OfS will consider the use of its enforcement powers where it judges there to have been a breach of one or more conditions of registration.

168. Through this consultation, we are seeking the views of stakeholders on whether they think that the existing admissions system overall is fair and transparent. The evidence may indicate

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[98] UCAS is now forecasting a significant reduction (up to 75 per cent) in the number of providers making 'conditional unconditional' offers in 2020. The OfS welcomes this early forecast but notes that we will have to wait until summer 2020 to have the full picture of how providers have made their offers. This point is considered in more detail in **issue five**.

that further work needs to be done to improve transparency of the wider system and to address any perceptions that the system is not fair to all applicants.

**For all**

**Question 72:** What changes do you think should be made to the existing admissions system (if any), and why?

**Question 73:** How might the changes that you are suggesting apply across the wider admissions system (and not just to full-time undergraduate applicants who apply through UCAS)?

**Question 74:** Are you broadly in favour of keeping the existing admissions system in its current form (with some changes), or do you consider that a wider overhaul of the admissions system would be more beneficial to applicants and other stakeholders in the admissions system?

## Option 2: Post-qualification offers (PQO)

169. This option focuses on a centralised system for **full-time undergraduate** admissions. We would also like to hear stakeholders' views about the extent to which issues highlighted in respect of that part of the system apply across **the wider English higher education admissions system** (for **other applicant groups** and **other modes of study**) and what changes might be made to address those wider issues (and see **'Other options'** below).

170. In 1997, The Dearing Report 'Higher Education in the learning society' noted that a post-qualifications system 'would assist students since they know more about their abilities (and possibly their interests) having received their examination results and having studied for longer'.[99] Since then, a number of independent reviews have also recommended a post-qualifications applications (PQA) system, including the 2004 Schwartz review, and that system is considered further in Option 3 below.

171. The Dearing Report suggested that the main obstacle to the implementation of a PQA system was the relatively short time between the announcement of A-level results and the start of the higher education academic year. Many commentators continue to cite those timing issues as a key obstacle to the implementation of a PQA system today.[100]

172. Some stakeholders have suggested that a system of post-qualification offers (PQO) would overcome some of those timing issues whilst also addressing some of the issues identified in the current admissions system. Under a PQO system, applicants submit their applications before they sit their Level 3 examinations but offers are not made until after the results of those examinations are released.

173. In a recent student polling exercise, conducted as part of the UUK fair admissions review, 56 per cent of applicants agreed that offers should be made after people have received their academic results. Furthermore, 63 per cent of applicants who were 21 years or older, 60 per cent of BAME applicants and 63 per cent of those who were the first in their families to apply, agreed with that statement.[101]

174. Applicants still make their applications within the academic year rather than in the summer holidays after results. Therefore, potential issues around variations in the level of support available to applicants would be less acute than under a PQA system, where applications are delayed to the summer holidays.

175. The earlier application window (in comparison to a PQA system) also affords providers more time in which to process applications, assuming that applications are sent to providers when they are received. If applications are not released to providers until after results are

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[99] See recommendation 9, http://www.educationengland.org.uk/documents/dearing1997/dearing1997.html (p.121)

[100] It is interesting to note that, back in 1997, the Dearing Report observed that recent changes to the structure of the examination boards and the potential for using information technology to speed up the application process could make a PQA system feasible. This may mean that a PQA system is more feasible now, 23 years on, than it was in 1997.

[101] See https://www.universitiesuk.ac.uk/news/Documents/uuk-perceptions-fairness-comres-research.pdf [PDF] (p.19)

announced, this may create time pressures for providers and UCAS in processing those applications.

176. Postponing the offer-making period until after results may also create time pressures for applicants, providers and UCAS. In particular, applicants will have less time to make plans for their entry to higher education (even though, under the current system, conditional offers are not confirmed until after results are released, applicants still have an earlier indication of providers that have made offers to them).

177. Changes to dates for the release of Level 3 results and the start of the traditional academic year could be made to facilitate a PQO system, although the wider impact of such changes, on schools and colleges providing Level 3 qualifications in particular, would have to be considered carefully. Any additional implications of PQO for providers which currently operate earlier application deadlines (such as Oxbridge, the Conservatoires for music courses, and medical, veterinary and dental schools) would also need to be understood.

178. A PQO system could remove the need for formal predicted grades and remove unconditional offers from the system. Applicants will still need to understand from advisers what their attainment levels are likely to be because this will inform their choices about which providers and courses to apply for. A potential unintended consequence would be the development of a system of 'unofficial' predicted grades where some advisers may contact providers in the period between applications being received by providers and offers being made. The system may therefore disadvantage applicants whose advisers are less savvy or proactive in navigating the system. Making offers on the basis of actual results under a PQO system may reduce the emphasis on personal statements and academic references and may support greater transparency within the admissions system. However, the impact of a PQO system on providers for whom predicted grades are not currently the main factor in offer-making, such as those providing performing arts courses, would need to be considered.

179. Furthermore, conditional offers may be a motivating factor for students. The absence of such offers under a PQO system may mean that students perform to a lower standard in their Level 3 examinations.

180. Using a PQO system may also intensify the focus on examination results within the admissions system. Therefore, the development of contextual admissions processes within a PQO system would need to be considered carefully. In a recent student polling exercise, conducted as part of the UUK fair admissions review, 71 per cent of applicants who had received a contextual offer agreed with the statement that offers should be made after people have received their examination results.[102]

181. Applicants' choices about which providers and courses to apply for are informed by published entry tariffs and any issues related to a disparity between published and actual entry tariffs would still need to be addressed under a PQO system. A PQO system could involve an amended form of Clearing, enabling applicants to search for additional providers or courses if they perform better or worse in their Level 3 examinations than they had anticipated and so

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[102] See https://www.universitiesuk.ac.uk/news/Documents/uuk-perceptions-fairness-comres-research.pdf [PDF] (p.19)

do not receive offers that are right for them. However, 'Clearing' under a PQO system is likely to involve reduced choice compared to the current system.

182. A change to incorporate a PQO admissions system would have a wider impact on processes across the higher education landscape. For example, the impact on timings for student finance applications to the SLC would have to be considered. Early indications are that, for many applicants, a reduction in the time available to make student finance applications could be mitigated to some extent by introducing an earlier 'eligibility test' that would pre-approve applicants for any future student finance application. This would require changes to the information technology systems of the SLC and the same would be true of other stakeholders, including providers and UCAS.

**For all**

**Question 75:** What are the advantages and disadvantages of a post-qualifications offers admissions system?

**Question 76:** Are you broadly in favour of an admissions system for undergraduate applicants in which offers are not made until after Level 3 (e.g. A-levels or BTEC) results are announced?

**Question 77:** What impact might the introduction of a post-qualifications offers system for full-time home undergraduate admissions have on other applicant groups and modes of study?

## Option 3: Post-qualifications applications (PQA)

183. As with post-qualification offers (PQO), this option focuses on a centralised system for **full-time undergraduate** admissions. We would also like to hear stakeholders' views about the extent to which issues highlighted in respect of that part of the system apply across **the wider English higher education admissions system** (for **other applicant groups** and **other modes of study**) and what changes might be made to address those wider issues (and see **'Other options'** below).

184. The post-qualification applications system (PQA) would bear many of the same hallmarks as PQO but with one crucial difference for applicants and providers. The applicant would not complete their application until after results were known and, as a result, providers would not have any sight of applications until after results are known.

185. In a recent student polling exercise published by UUK, 56 per cent of applicants agreed that 'the application process should only begin after people have received their academic results, even if the term started later'.[103] Furthermore, 63 per cent of BAME applicants and 59 per cent of applicants who were the first in their families to apply agreed with this statement. Both UCAS and UCU have previously proposed timetables that could accommodate a move to post-qualifications applications, demonstrating the serious consideration that has been given to this option.[104]

186. A move to PQA has been advocated over a sustained period through a number of higher education reviews, as well as by some providers, education organisations and individuals.[105] The steering group of the 2004 Schwartz review gave whole-hearted support to a move to PQA, in the belief that it would lead to greater transparency in the admissions system, as well as greater efficiency and alignment with its principles for fair admissions. For those who have argued in favour of PQA, the benefits could include:

- Increased transparency in the admissions system. This would be achieved through simplifying the system (for example through the abolition of predicted grades and the fact that all offers would automatically become unconditional) as well as, potentially, through introducing incentives that could drive greater transparency. For example, if providers were not able to see applications until results were known then it may be that they would become more likely to publish actual entry requirements (or a range of actual entry requirements) instead of publicising ambitious advertised entry requirements (see **Issue one**). Similarly, advocates of PQA argue that it could drive greater transparency in areas such as contextual offer making, for similar reasons.

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[103] See https://www.universitiesuk.ac.uk/news/Documents/uuk-perceptions-fairness-comres-research.pdf [PDF] (p.20)

[104] See https://www.ucas.com/file/956/download?token=y8EovXLo (p.33) [PDF] and https://www.ucu.org.uk/media/10041/Post-qualification-application-a-student-centred-model---Jan-2019/pdf/PQA_report_Jan19.pdf [PDF] (p.11)

[105] For a few examples, see University of Nottingham registrar support: https://wonkhe.com/blogs/university-admissions-have-to-change-its-time-for-pqa/ ; UCU support for PQA: https://www.ucu.org.uk/media/9430/Post-Qualifications-Admissions-How-it-works-around-the-world/pdf/UCU_PQA_around_the_world_Report_June18.pdf [PDF]; and Sutton Trust support: https://www.suttontrust.com/wp-content/uploads/2017/12/Rules-of-the-Game.pdf [PDF]; Sir John Dunford: https://www.tes.com/news/level-results-day-we-must-change-university-admissions

- Focusing the admissions system more towards results achieved rather than a combination of predicted grades, personal statements and references. Some advocates of PQA argue that academic qualifications are a better measure on which to base assessment of applications.

- The removal of 'undesirable' parts of the admissions system. As well as simplifying the system and making it more transparent, advocates of PQA argue that it would remove elements of the process that are not working effectively. For example, predicted grades would become redundant (which would likely be a good outcome for disadvantaged high attainers – see issue two), pre-qualifications unconditional offers could not be made and the timeframe in which providers could use inducements would potentially be reduced.

187. Some of the arguments against a move to PQA have been expressed as follows:

- The timings of the system would create significant pressures across the education system, including for SLC, UCAS, exam boards and schools and colleges. The tangible impact of this for students would include potential difficulties with finding accommodation and processing student finance. Addressing these timings issues would potentially require major upheavals in academic timelines. This could potentially leave providers with less time to contextualise achievement and make reasoned and fair contextual offers.

- Significant difficulty accommodating admissions tests, auditions, interviews or other assessment methods into a PQA timetable.

- Support for applicants may be diminished by pushing the application window into the summer months.

- Conditional offers may be a motivating factor for students. The absence of such offers under a PQA system, may mean that students perform to a lower standard in their Level 3 examinations.

- Some of the issues discussed above could potentially be pushed 'downstream' in the admissions process under a PQA system. For example, inducements could still be made at a high volume but simply later in the process.

188. Clearly, a move to PQA would represent a significant shift for all stakeholders across the education system. We would like to hear up-to-date views from all stakeholders about any possible move to a PQA system.

**For all**

**Question 78:** What are the advantages and disadvantages of a post-qualifications applications admissions system?

**Question 79:** Are you broadly in favour of an admissions system for undergraduate applicants in which applications are not completed until after Level 3 (e.g. A-level or BTEC) results are known?

**Question 80:** What impact might the introduction of a post-qualifications applications admissions system for full-time home undergraduate admissions have for other applicant groups and modes of study?

## Other options

189. In this section, we are inviting respondents to tell us about:

- Any other models or approaches, other than those discussed above, that they consider could improve the admissions system for full-time undergraduates

- Whether aspects of **Options 2 and 3** (post-qualifications offers and post-qualifications applications) could be used for the wider admissions system

- Any other models or approaches to higher education admissions that they consider to be relevant.

190. We are aware of a number of models for reform for full-time undergraduate admissions, such as a 'comprehensive university' which accepts students with a range of different entry qualifications, and a system of random allocation of places. However, discussion of these models is not yet well-developed across the sector. We would like to hear the views of respondents on these sorts of approaches, together with any others which they would like to highlight.

191. We would also like to hear from respondents on whether they think that aspects of **Options 2 and 3** above could be used for the wider admissions system. For example, how might a centralised system of admissions be applied to other modes and levels of study, for example to part-time or postgraduate provision?

192. This consultation is wide-ranging and through it we hope to stimulate discussion and debate. We are also inviting respondents to tell us about any other models or approaches to higher education admissions that they consider relevant and which we have not considered in this consultation. We want to hear from respondents about ideas that are not currently being considered widely, especially if they relate to improving the experience of international, postgraduate and direct applicants.

**For all**

**Question 81:** Are there any other models or approaches to admissions for full-time undergraduate applicants that you would like to highlight?

**Question 82:** Are there any other models for, or approaches to, higher education admissions for any other group of applicants or mode of study that you would like to highlight?

**Question 83:** Are there aspects of Option 2 (post-qualifications offers) and/or Option 3 (post-qualifications applications) that might apply across the wider admissions system?

## Additional consultation questions

**For all**

**Question 84:** Do you have any comments about the impact, or potential impact, of any of the options outlined in the 'Future options' section of this consultation, on particular groups of students, including those with protected characteristics?

**Question 85:** Are there aspects of this consultation that you found were unclear? If so, please specify which, and tell us why.

**Question 86:** In your view, are there ways in which this consultation could be delivered more efficiently or effectively than what is set out here?

**Question 87:** Do you have any other comments in relation to this review?

# Abbreviations used in this consultation

| | |
|---|---|
| **APEL** | Accreditation of Prior Experiential Learning |
| **APL** | Accreditation of Prior Learning |
| **AoC** | Association of Colleges |
| **ASA** | Advertising Standards Authority |
| **BAME** | black, Asian and minority ethnic |
| **CMA** | Competition and Markets Authority |
| **FHEQ** | Framework for Higher Education Qualifications |
| **HEPI** | Higher Education Policy Institute |
| **HERA** | Higher Education and Research Act (2017) |
| **HESA** | Higher Education Statistics Authority |
| **OfS** | Office for Students |
| **PQA** | post-qualifications application |
| **PQO** | post-qualifications offer |
| **PSED** | Public Sector Equality Duty |
| **SLC** | Student Loans Company |
| **UCAS** | University and College Admissions Service |
| **UUK** | Universities UK |

# Annex A: Brief overview of the current admissions process in English higher education

1. The University and College Admissions Service (UCAS), and its predecessor organisations, has managed a highly centralised system of full-time undergraduate admissions, which is unique globally, since 1961.[106]

2. Under the UCAS system, prospective full-time **undergraduate** students (whether from the UK, EU or international) initially apply for up to five courses. These applications are informed by prior academic attainment (such as GCSE grades), predicted grades, a personal statement and an academic reference (together with a practical reference if the applicant is applying for a music or other arts course at a 'conservatoire').[107] Applicants then receive offers, usually conditional on academic success, and they must choose a first choice 'firm' and second choice 'insurance' course. Applicants without an offer can enter 'Extra' and make another choice. Applicants then complete their qualifications and discover whether they have secured a place at either their 'firm' or 'insurance' choices once they receive their results. Those applicants who are left without a place can go through 'Clearing' to search for an alternative course (or release themselves into Clearing if they do not wish to take up their firm or insurance offers). Or, if an applicant exceeds the conditions of their firm offer, they can enter 'Adjustment' to seek alternative courses.

3. Some providers do not use the UCAS system for some or all of their **undergraduate** provision. Prospective students must then apply directly to those providers.

4. UCAS runs a centralised admissions process for some **conservatoires**, which are specialist providers offering **undergraduate** and **postgraduate** music and performing arts courses. Applicants can apply to up to six conservatoires and must submit a personal statement and two references, one practical and one academic, as part of their application. They are also required to undergo an audition. Applicants then receive offers and can accept a first choice and (unless their first choice is a 'guaranteed unconditional offer') a second choice. The conservatoires scheme is a separate UCAS scheme and conservatoires do not use the Clearing process.

5. UCAS also provides an application service for some providers in respect of their **postgraduate** provision, as well as general admissions schemes for postgraduate performing arts at a conservatoire, postgraduate teaching and some postgraduate accelerated medicine and nursing programmes.[108] However, the majority of prospective postgraduate students apply directly to their chosen provider(s) rather than through any centralised admissions system.

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[106] UCAS was formed in 1994 when its predecessor organisation, the University Central Council on Admissions (UCCA) merged with the Polytechnic Centralised Admissions Service (PCAS).

[107] Some higher education providers do not use the UCAS service for their full-time undergraduate courses, preferring to receive applications directly from applicants.

[108] See https://www.ucas.com/postgraduate.

6. Many English higher education providers also offer flexible study options such as **part-time mode**, **distance learning** and **higher and degree apprenticeships** and other work-based learning involving higher education. These options may be particularly attractive to mature applicants who need to balance their studies with other life commitments. Although some of these courses may be searched for (and sometimes applied for) through UCAS, in many cases prospective students must approach the relevant provider(s) directly.[109]

7. International (non-EU) students wishing to study at English higher education providers may face additional issues, including requirements to undertake an English language test, and visa requirements which may limit the types of course that can be applied for.

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[109] Data published by HESA indicates that, for the academic year 2017-18, 46 per cent of entrants to higher education in England were not full-time undergraduate students. See https://www.hesa.ac.uk/data-and-analysis/sb254/figure-16. This does not include providers that do not return data to HESA.

# Annex B: Summary of future options in relation to issues in the consultation

In the tables below, we have mapped the future options of 'retaining existing system with reforms' (Option 1) and the two post-qualification models (Options 2 and 3) against some of the issues that we have identified in this consultation document. The aim of this exercise is to identify some of the possible consequences of the reforms that could be encompassed within those future options, to stimulate further debate and to highlight points which stakeholders may wish to consider when framing their responses to the 'future options' section of this consultation.

The points that we have identified are indicative only and stakeholders may identify many more. Furthermore, we have not considered the possible 'unintended consequences' of the future options. Nor have we considered how the different reforms might interact with each other. We welcome responses that begin to explore these consequences in more detail.

## Option 1: Retain existing system with reforms

| Advertised entry requirements versus actual entry requirements | The use and accuracy of predicted grades | Personal statements and references | Auditions, portfolios, admissions tests and interviews | Contextual offers and admissions | Unconditional and 'attainment' offers | Incentives or inducements | 'Later' applications including the use of 'Clearing' | Transparency of admissions |
|---|---|---|---|---|---|---|---|---|
| **Remove predicted grades** | | | | | | | | |
| Removal of predicted grades could have no impact or unpredictable impact. | Predicted grades are removed from the system. | Importance of personal statements and references could increase due to lack of predicted grades. | Importance of auditions etc could increase due to lack of predicted grades. | If no predicted grades, could become more difficult to make contextual offers informed by likely achievement. | Removal of predicted grades could have no impact or unpredictable impact on these offers. | Removal of predicted grades may reduce use of incentives or inducements, (to the extent that they are used on basis of predicted grades). | Removal of predicted grades could have no impact or unpredictable impact. | System could become more transparent for most applicants if predictions which were inaccurate are removed. |

| Advertised entry requirements versus actual entry requirements | The use and accuracy of predicted grades | Personal statements and references | Auditions, portfolios, admissions tests and interviews | Contextual offers and admissions | Unconditional and 'attainment' offers | Incentives or inducements | 'Later' applications including the use of 'Clearing' | Transparency of admissions |
|---|---|---|---|---|---|---|---|---|
| **Improve accuracy of predicted grades** | | | | | | | | |
| Improved accuracy of predicted grades could have no impact or unpredictable impact. | Predicted grades become more accurate. | Importance of personal statements and references could diminish due to predicted grades being more reliable. | Importance of auditions etc could diminish in some instances due to predictions being more reliable. | Contextual offers could be easier to calibrate effectively due to predicted grades being more reliable. | There could be a rise in unconditional offer making, driven by predicted grades. | There could be a rise in the use of incentives or inducements to the extent that they are used on basis of predicted grades. | Improved accuracy of predicted grades could have no impact or unpredictable impact. | System could become more transparent for most applicants where predictions are more accurate |
| **Introduce national aptitude testing or national subject-related tests** | | | | | | | | |
| Entry requirements could be changed to reflect new forms of assessment. | Importance of predicted grades could diminish due to additional forms of assessment. | Importance or personal statements and references could diminish due to additional forms of assessment. | Importance of auditions etc could diminish due to additional forms of assessment. | Contextual offers could be calibrated to take account of additional assessments. | Use of national testing could have no impact or unpredictable impact on unconditional offer making. | Use of national testing could have no impact or unpredictable impact on use of incentives or inducements. | Size of Clearing could reduce if national assessments led to better matching of student and course pre-results. | System could become more transparent where national assessment results are taken into account. |

| Advertised entry requirements versus actual entry requirements | The use and accuracy of predicted grades | Personal statements and references | Auditions, portfolios, admissions tests and interviews | Contextual offers and admissions | Unconditional and 'attainment' offers | Incentives or inducements | 'Later' applications including the use of 'Clearing' | Transparency of admissions |
|---|---|---|---|---|---|---|---|---|
| **Sector-developed code of conduct on unconditional offers** | | | | | | | | |
| Code could have no impact or unpredictable impact. | Code could have no impact or unpredictable impact. | Code could have no impact or unpredictable impact. | Code could have no impact or unpredictable impact. | Providers may be more likely to make contextual, rather than unconditional offers. | Unconditional offers would be reduced or ended, depending on the code and its reach. | There could be a rise in the use of incentives or inducements, if this was not covered in the code. | Code could have no impact or unpredictable impact. | System could be more transparent to the extent that there is clarity of approach on unconditional offers. |
| **Reform or removal of the personal statement and reference requirements** | | | | | | | | |
| Reform or removal of personal statement or reference requirements could have no impact or unpredictable impact. | Depending on the changes made, the importance of predicted grades could rise or fall. | Personal statement and reference requirements would be removed or reformed and could become more or less important. | Depending on the changes made to personal statement and reference requirements, other forms of assessment could become more or less widespread. | If the emphasis on personal statement and references was reduced or removed, then contextual offers could become more widespread. | Changes to personal statement and reference requirements could have no impact or unpredictable impact on unconditional offers. | Depending on the changes made to personal statement and reference requirements, the existence of incentives or inducements could become more or less widespread. | If pre-qualifications applications are made simpler, fewer people may apply later in the cycle or apply for the first time through Clearing. | Depending on the changes made to personal statement and reference requirements, the system could become more transparent. |

| Advertised entry requirements versus actual entry requirements | The use and accuracy of predicted grades | Personal statements and references | Auditions, portfolios, admissions tests and interviews | Contextual offers and admissions | Unconditional and 'attainment' offers | Incentives or inducements | 'Later' applications including the use of 'Clearing' | Transparency of admissions |
|---|---|---|---|---|---|---|---|---|
| **Sector-developed code of conduct for contextual admissions, including published standard and minimum entry tariffs** | | | | | | | | |
| Could be addressed to the extent that a standard and minimum entry tariff is published | Code could have no impact or unpredictable impact. | Code could have no impact or unpredictable impact. | Use of auditions etc could be reduced or reformed (e.g. costs reduced) if this were covered in the code. | Contextual admissions could be reformed in ways set out in the code and dependent upon its reach. | No impact or unpredictable impact unless covered by the code. | No impact or unpredictable impact unless covered by the code. | Could reduce the size of Clearing if applicants' confidence in the mainstream system were to be increased through the delivery of the code. | Transparency could be increased, to the extent that the code sets out expected behaviours and is adhered to. |

# Post-qualification models –

## Option 2: Post-qualifications offers (PQO)

| Advertised entry requirements versus actual entry requirements | The use and accuracy of predicted grades | Personal statements and references | Auditions, portfolios, admissions tests and interviews | Contextual offers and admissions | Unconditional and 'attainment' offers | Incentives or inducements | 'Later' applications including the use of 'Clearing' | Transparency of admissions |
|---|---|---|---|---|---|---|---|---|
| PQO could have no impact or unpredictable impact. | Impact of PQO is dependent on the extent to which predicted grades continue to be a feature of the system. | Impact of PQO is dependent on the extent to which statements and references continue to be a feature of the system. | PQO could have no impact or unpredictable impact (on the assumption that auditions etc. continue to feature in the system). | Under PQO, contextual offers could be made in a more transparent way, with results already known at the point of offer. | Under PQO, these offers would be removed from the system. | Under PQO, the use of incentives or inducements could increase if providers were able to contact students between the application and offer stage. | Later applications and use of Clearing could reduce if stated benefits of PQO system were delivered. | Transparency could be increased through clarity of offer-making practice but potentially offset by the time pressure introduced to the system. |

# Post-qualification models –

## Option 3: Post-qualifications applications (PQA)

| Advertised entry requirements versus actual entry requirements | The use and accuracy of predicted grades | Personal statements and references | Auditions, portfolios, admissions tests and interviews | Contextual offers and admissions | Unconditional and 'attainment' offers | Incentives or inducements | 'Later' applications including the use of 'Clearing' | Transparency of admissions |
|---|---|---|---|---|---|---|---|---|
| PQA system could incentivise providers to address the gap between advertised and real entry requirements | Under PQA, predicted grades would be removed from the system. | Under PQA, the importance of personal statements and references could diminish due to results being known, if indeed they would continue to be used. | PQA could have no impact or unpredictable impact (on the assumption that auditions etc. continue to feature in the system). | Under PQA, contextual offers could be made in a more transparent way, with results known at the point of offer and potentially providers more likely to make clear in advance the circumstance where contextual offers would be made. | Under PQA, these offers would be removed from the system. | Under PQA, the timeframe for offering inducements would be shortened, possibly reducing the amount of inducements offered. | Clearing could reduce in size if applicants were able to calibrate their applications to results after results are known. | Transparency could be increased through greater clarity of offer-making, though greater time pressure would be introduced into the system. |

# Annex C: Glossary of technical and other terms used in this consultation

**Attainment offer**

An 'attainment offer', sometime referred to as an 'incentivised offer', is an offer which is conditional on examination results but with very low attainment requirements: for example, two E grades at A-level.

**Clearing**

'Clearing' is a system run by UCAS for some undergraduate admissions. It is available from July to September each year and is how some providers fill any places that they still have on their undergraduate courses. Applicants can use Clearing if they: (i) are applying for the first time after 30 June; (ii) did not receive any offers (or none they wanted to accept); (iii) didn't meet the conditions of their offers; or (iv) wish to decline their firm choice. Through Clearing, applicants can contact providers directly about courses which have vacancies.

More information is available on the UCAS website. See
https://www.ucas.com/undergraduate/results-confirmation-and-clearing/what-clearing

**Contextual offer**

In contextualised admissions, providers use information to assess an applicant's prior attainment and potential, in the context of their individual circumstances. A '**contextual offer**' may be part of that approach and is an offer with a lower grade requirement (compared to the provider's standard grade offers) made to an applicant who is from a disadvantaged background or a group which is underrepresented in higher education. A contextual offer may sometime be '**conditional**' on the applicant making the offer their 'firm' choice.

**Entry tariffs**

Providers set their own entry requirements and these vary from provider to provider and across courses. The entry requirements may include entry tariffs relating to particular subjects and/or grades at Level 3, such as A-levels or BTEC. Providers that require high grades in Level 3 qualifications are sometime referred to as 'high (or higher) tariff' providers. Those that require lower grades in Level 3 qualifications, are sometimes referred to as 'low (or lower) tariff' providers.

**Framework of Higher Education Qualifications (FHEQ)**

The FHEQ sets out levels of higher education qualifications, and is illustrated by typical qualifications for that level, for example Higher National Certificates, graduate diplomas, bachelor degrees. Each level includes a descriptor that sets out the generic outcomes and attributes expected for the award of qualifications at that level.

**Incentives and inducements**

Providers may offer incentives or inducements to applicants, such as a scholarship, bursary or cash payment, or a guaranteed place in provider accommodation, to encourage those applicants to accept their offer of a place.

**Level 3 qualifications**

Qualifications at Level 3 of the Regulated Qualifications Framework for England and Northern Ireland include A-levels, BTEC and access to higher education diplomas. There are corresponding frameworks in Wales and Scotland.

**Level 4 and 5 qualifications**

Qualifications at Level 4 of the FHEQ include Higher National Certificates (HNCs), certificates of higher education (CertHE), higher apprenticeships and other Level 4 certificates or diplomas.

Qualifications at Level 5 of the FHEQ include foundation degrees, Higher National Diplomas (HNDs), diplomas of higher education (DipHE) and other Level 5 certificates and diplomas.

**Personal statement**

The UCAS undergraduate admissions process (and the UCAS Conservatoires admissions process) requires applicants to submit a 'personal statement' as part of their application, setting out how their skills and experience make them suitable for the course(s) for which they are applying. Where applicants apply directly to providers, they may also be required to submit some sort of personal statement with their application.

**Post-qualifications applications (PQA)**

Under a post-qualifications applications (PQA) system, applicants would not complete their applications, and those applications would not be submitted to providers, until after Level 3 results are known. To date, discussion of a PQA system has focused on a centralised system for full-time undergraduate admissions.

**Post-qualifications offers (PQO)**

Under a post-qualifications offers (PQO) system, applicants submit their applications before they sit their Level 3 examinations but offers are not made until after the results of those examinations are released. To date, discussion of a PQO system has focused on a centralised system for full-time undergraduate admissions.

**Protected characteristics**

It is against the law to discriminate against someone because of:

- Age

- Disability

- Gender reassignment

- Marriage and civil partnership

- Pregnancy and maternity

- Race

- Religion or belief

- Sex

- Sexual orientation

These are called protected characteristics. People are protected under the Equality Act 2020 from these types of discrimination.

More information is available on the Equality and Human Rights Commission (EHRC) website: https://www.equalityhumanrights.com/en/equality-act/protected-characteristics

**Provider**

A higher education provider, including universities, colleges and other types of provider which deliver higher education courses.

**SLC**

The Student Loans Company (SLC) is a non-profit making government-owned organisation that administers loans and grants to students in universities and colleges in the UK.

For more information see the SLC website: https://www.gov.uk/government/organisations/student-loans-company

**Stakeholder**

In this document a stakeholder refers to an individual or an organisation who may be impacted by the issues covered in the OfS review of admissions or with an interest in our work in this area.

**UCAS**

The Universities and Colleges Admissions Service (UCAS) is an independent charity which provides information, advice and admissions services in relation to higher education. UCAS operates a centralised admissions system for many full-time undergraduate courses in the UK as well as for some postgraduate courses.

For more information see the UCAS website: https://www.ucas.com/about-us/who-we-are

**Unconditional offer**

An unconditional offer is an offer of a place at a higher education provider that is not dependent on any future academic results, typically A-level or BTEC results. UCAS identifies three broad types of unconditional offer. These are 'direct unconditional' offers which guarantee an applicant a place without any conditions at the first point of offer, the 'conditional unconditional offer' where the offer only becomes unconditional if the applicant makes the offer their 'firm' choice and this has been identified in the UCAS admissions system through free text fields, and 'other unconditional' offers which are conditional at the point of offer and become unconditional before the end of June.

**UUK**

Universities UK (UUK) is the collective voice of 137 universities in England, Scotland, Wales and Northern Ireland. UUK's members are the vice-chancellors or principals (executive heads) of those universities and it is financed mainly through subscription from those universities.

For more information see the UUK website: https://www.universitiesuk.ac.uk/Pages/home.aspx