

UCAS Admissions Process Review Consultation

A response from the Russell Group of Universities

1. Summary

- 1.1 We are more than willing to consider and explore ways of improving the current application system, but we would need to be persuaded that any proposed changes would offer significant benefits to the majority of students.
- 1.2 We all agree that it is important that our applications system is fair and supports access for all, puts applicants at the heart of the system, meets the needs of a diverse range of applicants, is effective and efficient, and delivers a net benefit to all concerned. However, we have very carefully considered the proposals from the UCAS Admissions Process Review, along with the supporting evidence and we are not persuaded by the evidence put forward that the central proposal for 2016 – a system of applications post results – does in fact deliver against these important criteria. We believe that the disadvantages of the proposed changes for students and the costs and major upheaval for both schools and universities outweigh the benefits.
- 1.3 We are concerned that the UCAS proposals would in fact restrict the ability of institutions to make a fair and thorough assessment of applicants, and also limit the opportunities for applicants to make informed decisions about which university to apply to. It is far from clear that a new post-qualification system would be fairer or improve access to leading universities and we are concerned that the changes could even hamper our efforts to attract students from disadvantaged backgrounds, for example, by limiting the time we have to run special access schemes. Most importantly these changes would do nothing to tackle the fundamental problem of the attainment gap which restricts access to leading universities.
- 1.4 We take very seriously any evidence of unfairness in the current system and believe that careful consideration must be given to whether improvements to the application process could be better achieved in other ways. We are supportive in principle of some of the enhancements included in the proposed system for the 2014 year of entry. These recommendations will need further discussion and consideration based on more detailed proposals and we think that a slightly longer timeframe for their introduction may need to be considered to ensure that disruption to applicants is minimised.

2. Introduction

- 2.1 The Russell Group represents 20 leading UK universities which are committed to maintaining the very best research, an outstanding teaching and learning experience and unrivalled links with business and the public sector. Russell Group universities educate 21% of HE students and in 2010-11 accounted for a quarter of all UCAS applications.
- 2.2 The experience of applicants when applying to Russell Group universities is something that we take very seriously, and we are keen to consider and explore ways of improving the current system. An effective admissions system should ensure that applicants can identify the institutions that best suit them, and that institutions can identify those

prospective students with the most ability and potential to benefit from the education that they can provide.

- 2.3 The Russell Group believes that it is essential to maintain a well-functioning UK-wide admissions system and it is therefore important that the implications for all nations of the UK are properly considered.
- 2.4 This document sets out our overall response to the proposals in the consultation report. We have also completed the response form with direct responses to the specific questions asked, and this is attached.

3. Proposals for applications post results from 2016

We do not believe that the proposed system would be fairer for applicants

- 3.1 Most importantly, changes to the process for applying to university would do little to address the fundamental root causes of inequality and unfairness in the system, which are the gaps in attainment between disadvantaged pupils and their peers, and variation in the quality of information, advice and guidance. The consultation document importantly highlights the inequality in the advice, guidance and support that young people receive, and we would agree that it is crucial that this issue is addressed. But it is not clear how changing the timing of applications would change this situation, and it seems likely that well-advised applicants would continue to be advantaged. The proposed post-results system might indeed be even more reliant on the quality of advice, as it is intended to benefit those students who achieve better results than expected and who may need to reassess their options and choices quickly after results. The well-advised candidate is also likely to register earlier and benefit from advance notification of tests and interviews. We are concerned that focusing attention on the admissions system could risk diverting attention and energy away from the real causes of inequality.
- 3.2 We understand some of the concern about the unreliability of predicted A-level grades. However, over half of all grades are accurately predicted and nearly 90% are accurate to within one grade. Higher grades, held by applicants to our universities, are more likely to be accurately predicted¹ which means that the unreliability of predictions is less significant an issue in applications to the most selective institutions. And where grades are inaccurately predicted, they are far more likely to be *over*-predicted than under-predicted, particularly for students from lower socio-economic groups. The size of the group who might, in theory, benefit by changing their minds after receiving better than predicted results and applying to a more competitive university, is therefore likely to be small and exceeded by the size of another group who would be disadvantaged by the proposed system as universities would not have the flexibility that some currently use to accept those who miss their predictions and their conditional offers. Reliance on predicted grades is also unlikely to be eliminated in the proposed post-results system. For it to work effectively and avoid extremely rushed last-minute decision-making, applicants would need to do substantial research and preparatory work, inevitably guided by an idea of what they are likely to achieve. There would be limited time to revise choices if the applicant found that they had exceeded expectations. The consultation document

¹ Investigating the Accuracy of Predicted A Level Grades as part of 2009 UCAS Admission Process, BIS, June 2011

describes applicants 'fine-tuning'² their applications after results, acknowledging that fundamental decisions would need to have already been taken.

- 3.3 Our institutions are fully committed to identifying those applicants with the greatest potential to benefit from the learning opportunities that they provide and excel on their degree courses. They would therefore endeavour to continue to conduct a fair, through and holistic assessment of every applicant, drawing on a range of information. We have some concerns, however, that the timetable of the proposed system could risk undermining that commitment. We acknowledge that by restricting applicants to only two choices the overall volume of applications is likely to be somewhat reduced for most institutions. But for some of the most popular and oversubscribed universities there may be little change in the volume, and there may be a concurrent increase in the amount of pre-application contact with applicants required through the system of shortlisting and expressing interest. In any case, the very large volume of applications to be processed in the short timeframe available would create pressure for assessment to become more mechanistic and more heavily reliant on exam results.
- 3.4 Reducing the number of choices applicants can make, from the current five to the proposed two, could risk discouraging the more aspirational applications that the greater certainty of a post-results system is intended to encourage. We are concerned that applicants may be discouraged from applying to the most competitive and over-subscribed courses, fearing that if these are unsuccessful other alternatives they might consider would be full by the start of Apply 3. We are particularly concerned that this may be more likely to discourage less confident students. In addition, the system would benefit students who can 'afford' to take the greatest risks with their two choices and if necessary apply again the following year, in Apply 1, already holding their results. We were interested to note that the *quantitative research commissioned by UCAS to support the review indicated that reducing the number of choices was unpopular with a representative sample of current applicants and students*³, and that qualitative research indicated that those applying for the most competitive courses, in particular, felt that more choices were needed⁴.
- 3.5 We would need to consider the implications of a post-results system for the successful special access schemes run by many of our institutions, targeted at students with potential from under-represented groups, who might not otherwise apply. As currently designed, these successful schemes would not be possible to run in a post-results system, and we are concerned that this would hamper rather than help our institutions' efforts to attract students from disadvantaged backgrounds. In general, there would be significantly less time for students to 'bond' with their chosen institution, which may have a greater impact on those coming from families that have no earlier experience of higher education.

² UCAS, APR consultation, p.7

³ UCAS, APR Applicant Voice: Review of quantitative analysis.

<http://www.ucas.com/reviews/admissionsprocessreview/>

⁴ UCAS, APR Applicant Voice Exploring ideas for a revised admissions system: Review of qualitative analysis.
<http://www.ucas.com/reviews/admissionsprocessreview/>

We are not convinced that the proposed system would support better decision-making by applicants

- 3.6 We agree that it is essential that young people receive clear information, effective support and high quality advice in making important decisions about post-16 subject choice and applications to HE. However, we are unconvinced that decisions taken six months later would inevitably be better decisions. We are not convinced that data on the number of applicants who change their minds or withdraw is direct evidence that better decisions would be made later. And whilst we think that there are likely to be a number of reasons why those HEIs that take a larger percentage of their students through Clearing have higher dropout rates⁵, this finding should certainly make us think carefully about the implications of making more applicants take key decisions in a similar timeframe.
- 3.7 We would be keen to explore further the assumption that young people would use the additional time in Year 13 to do further research, leading to better decisions. It seems possible that some young people might leave research and choices until the last minute, leading instead to rushed, poor quality decisions. It would be useful to undertake analysis to understand which of these scenarios is most likely to result and in particular how different groups of young people are likely to be affected. And if the time is used for extended research as envisaged, this may run the risk of research into university options conflicting more with study time in Year 13. As the time from Easter until exams should certainly be focused on study and revision, in reality the research period would only be extended by a maximum of three months, even for students who do use the additional time in this way.
- 3.8 For a post-results system to have the intended benefit of enabling applicants to reappraise their options and change their minds based on the results they have actually received, they will need to take these key decisions quickly, right at the end of the summer term. The views of schools organisations will be essential on this point, but it seems possible that some students may have *more limited access to teachers and advisers at this point in the year, and that students without a family history of higher education and access to advice at home are the most likely to be disadvantaged by this.*
- 3.9 We note that the quantitative research with a representative sample of applicants and students showed that the vast majority, 96%, felt that they had enough time to make decisions about which offers to accept in the current system, or felt that there was already not enough time.⁶ Under the proposed system, however, applicants would have *much less* time to make these decisions and the evidence suggests that applicants would find this difficult. We also noted that *three-quarters of respondents felt that they had enough time for research at the moment.* This does not strongly support the assumption that more time would lead to more research.

⁵ UCAS, APR consultation, p.26

⁶ UCAS, APR Applicant Voice: Review of quantitative analysis.
<http://www.ucas.com/reviews/admissionsprocessreview/>

We are not convinced that the proposed system would improve the applicant experience

- 3.10 We note that the top three reasons given by survey respondents for finding the current 'Apply' stage too complex are not related to the timing of the application process⁷. Moving to applications post results would not, therefore, in itself address the most common issues for applicants, and indeed there are likely to be other ways of addressing these negative experiences more directly and effectively.
- 3.11 With the number of choices reduced to two, and competitive degree courses remaining oversubscribed, it seems likely that more applicants could find themselves in a Clearing-type experience, entering Apply 3 with no successful applications from the main application window and with all places on other courses they would have considered already filled. The consultation document states that the current Clearing system is found to be a stressful and negative experience for many participants. Great care would therefore be needed to ensure that more applicants did not end up with a similar experience in the new system. In relation to the current Clearing system, the consultation document notes that 'Under pressure, some applicants will be making rushed choices about one of the most important decisions of their lives'⁸.
- 3.12 Applicants would not have their places confirmed until, at most, three weeks before the start of the university term, and some would not have their places confirmed until the first week of October. This would mean that students would have only a very short amount of time to make arrangements to get to their institution for the start of term, secure accommodation and make other practical arrangements. Whilst this is not itself a reason to reject change, it is important to consider the significant practical challenges that this would pose to students and families as well as institutions, and whether there would be sufficient benefits to the applicant experience overall to outweigh this. It would be particularly important to assess properly the impact on some groups of students, such as disabled students, who currently have much longer to make practical arrangements with their chosen institution, and to ensure that they are not disproportionately affected. There is a chance that the significant challenges relating to accommodation could lead to students considering their local university ahead of the best university for them.
- 3.13 The Russell Group represents research-intensive universities, where the summer period is currently a time where academic staff can focus on their research. The proposed system of applications post-results would require at least some of them to spend more time assessing applications during this period. This should not in itself be an obstacle to change, but undergraduate students benefit from learning in a research-intensive environment so the implications of this must be one factor to consider. Similarly, in light of the demanding degree courses that our institutions provide, we would want to be sure that moving A-level exams earlier in the year would not compromise the content and coverage of these qualifications.

⁷ Information is difficult to enter (37%); Not enough support from outside UCAS (31%); Haven't found information from UCAS easy to understand (29%). UCAS, APR Applicant Voice: Review of quantitative analysis.

<http://www.ucas.com/reviews/admissionsprocessreview/>

⁸ UCAS, APR consultation, p.25

International and cross-border considerations

- 3.14 The proposed annual timetable has particularly important additional implications for some of the devolved nations. In Northern Ireland, for example, the school term finishes at the end of June and the main application window would therefore occur during school holidays. In Scotland, many applicants already apply with results in the current system. It will be important to ensure that any changes work equally well for applicants and institutions in all areas of the UK in order to maintain a UK-wide applications system.
- 3.15 As leading research-intensive institutions with an international reputation for academic excellence, we compete directly with universities in other countries for the best students, whether from home or overseas. We are concerned that the proposals for applications post-results may limit the ability of our institutions to compete successfully internationally and create additional barriers for international students. Applicants would be holding offers from institutions in other countries much earlier in the year and begin building links with those institutions. They would already know whether they had met those offers at the point when they would be able to begin applying to the UK, which could mean that many of them decide not to pursue an application.
- 3.16 We understand that many international schools close earlier in the summer than the typical end of term in the UK, creating a similar problem to that mentioned above in relation to Northern Ireland, where applicants would be applying without access to teachers and advisers. Anything that makes UK universities more difficult to apply to in comparison to those in other countries risks limiting our ability to compete internationally.

4. Proposals for interim arrangements from 2014

- 4.1 We agree that it is a cause for concern that some applicants find the current system difficult to understand and navigate. We agree that we should seek ways to address these issues and improve the experience for applicants and are keen to work with UCAS to develop further many of the changes proposed for the 'interim' 2014 system. Indeed, we believe that some of these changes have the potential to address current problems even more effectively than moving to applications post results. Conclusions 2-4 and 6-8 in the section on key findings about the current system, for example, do not appear to be related to the timing of applications. As noted above, the research undertaken to support the review also indicates that current students and applicants are broadly happy with the current timescales.
- 4.2 There are a number of the proposed changes for 2014 which we agree in principle should be implemented. We agree that the proposal to rename the application windows Apply 1, Apply 2 and Apply 3 could be helpful, clearer and address negative connotations associated with the current terminology. If there are other ways to make the current terminology clearer, as suggested, then this should be done. Similarly, if there are technical improvements that would make it more difficult to enter incorrect information or submit incomplete applications then these should be introduced, and this is likely to improve the experience for applicants and the efficiency of the process for institutions. We also welcome the suggestion of creating a clear break between Confirmation and Apply 3 so that applicants and institutions have greater certainty, with institutions held as insurance knowing exactly how many places they have remaining and all applicants clear whether they have a place before this final stage opened.

- 4.3 There are a number of other proposed changes for 2014 which we would need to understand in more detail, but which we would in principle be willing to explore further if there is evidence that they are likely to benefit applicants. All of the proposals relating to common and firmer deadlines across the system would to some extent reduce flexibility for institutions and the degree of autonomy that they have over their own applications process, but if these changes are demonstrated to benefit applicants it will be important to give them further consideration on the basis of more detailed proposals. However, whilst we can see the potential benefit of a gathered field of applications on the first day of Apply 3 (current Clearing), we are less convinced that a single release date for offers in Apply 1 would be an improvement. It is not clear how this would reduce anxiety for applicants, and there would be implications for the level of support and advice that they can expect if all students in a school receive all of their HE offers on the same day. The views of schools organisations on the question of a single date for release of offers will be important.
- 4.4 We have more significant reservations about a further group of the proposals for the 2014 year of entry, and need more detailed information to understand and consider these properly. We are concerned about the proposal to enable multiple personal statements, partly due to the administrative cost of processing, but also because we think that the requirement for a single personal statement is helpful in encouraging students to reflect on the rationale for their choices, and that students with access to more support are likely to be better able to exploit the opportunity for tailored personal statements. We would be interested to explore further the suggestion that UCAS would automatically match results to offers at confirmation, but we would need to be assured that the system would be able to manage the full complexity of different types of offers, and we are clear that the formal confirmation decision would need to remain with institutions as it is contractually binding.
- 4.5 It is suggested in the consultation document that in the proposed 2014 system applicants would be able to build up a shortlist of courses prior to submitting a formal application, and that on the basis of this shortlist 'personalised information would be pushed to applicants and HEIs at appropriate stage'⁹. We are not clear what this means in practice and would want to understand much more about what is envisaged and how it would work. We have some reservations about the potential to introduce a new source of confusion and complexity or further myths and misunderstanding, for example about the expectations of particular institutions of being placed on an applicant's shortlist by a particular point in time.
- 4.6 In relation to the insurance choice, it is clear that some applicants may not fully understand the current system. We agree that it is important to look for ways to improve its operation, and the advice that applicants receive about how to use it. There is a significant risk that removing the insurance choice altogether could discourage some students from aspiring to the most competitive courses. But we do recognise that the system, as it currently operates, generates significant uncertainty and makes planning difficult for some institutions. We therefore think that the insurance option should be retained, but that further work should also be done to ensure that it continues to provide an effective backstop for applicants, especially those applying to the most selective and oversubscribed courses and universities, whilst at the same time reducing the problems that it currently creates for some institutions.

⁹ UCAs, APR consultation, p.44

4.7 In conclusion, with regards to the changes proposed for the 2014 year of entry, the technical detail will be crucial and will need further discussion and consideration. We are keen to be actively involved in those further discussions and are supportive in principle of those changes that can be shown to improve the system and experience for applicants. We have some concerns about the proposed timeline and whether it will be possible to explore and agree all of the detail in time to make changes for applicants beginning the process in 2013. It will be important to ensure that changes are made in an orderly way and can be properly tested in order to avoid undue disruption for a particular cohort of applicants. We also do not think it would be advisable to make changes in 2014 and for the system to then experience further change again two years later in 2016.

5. Review process and methodology

5.1 We agree with UCAS that it is important that proposals for change on this scale are supported by robust and convincing evidence, in order to be confident that benefits will be delivered and to secure commitment to the change process from all involved. We welcome the supporting evidence for the proposals made available by UCAS on its website.

5.2 We were concerned to see that there is some very important and relevant information in the supporting evidence documents that is not highlighted or referenced anywhere in the main document and which in many cases, undermines the argument set out in the consultation document. Examples that have already been noted in our comments above include:

- The proposal to reduce the number of choices was not popular, and in fact some suggested that more choices are needed
- 96% of current applicants and students felt that they had the right amount or not enough time to make decisions about which offers to accept or decline in the current system
- 81% of current applicants and students feel that there is the right amount of time between applying and going to university, whilst only 11% think that there is too much time
- Three quarters of current applicants and students felt that they had enough time to research their choices

5.3 These proposals come at a time of significant change for the HE sector in the UK, for example in relation to the operation of student number controls in England, and there remains uncertainty about the effect that these changes will have on admissions. It would be helpful for this to be acknowledged, both because the context in which these proposals should be assessed may differ greatly in a few years, and because the way that those changes play out in the system may in itself address some of the issues presented as motivations for the proposals.

6. Conclusion

6.1 In conclusion, we remain unconvinced that a sufficiently strong case has been made to justify the change to a system of applications post-results proposed for 2016. We see more merit in the changes proposed for 2014, subject to the reservations outlined above, and we would strongly encourage UCAS to focus on developing those proposals in more detail for further consideration in due course, and on identifying any further enhancements to the current system which can be shown to improve the experience of applicants.