



Department  
for Education

# Post-Qualification Admissions Reform

**Government consultation**

**Launch date 21 January 2021**

**Respond by 13 May 2021**

# About You

1. Please provide your name.

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2. Please provide your email address.

admissions@cam.ac.uk

3. Are you responding as an individual, or as part of an organisation? (please circle)

Education Provider

4. If you are responding on behalf of an organisation please provide the following:

Organisation name

University of Cambridge

Organisation postcode

CB2 1TN

Role

Secretary to the Senior Tutors' Committee (Dr Frasca-Spada) and Senior Pro-Vice Chancellor for Education (Professor Virgo)

5. If you are responding as an individual, please confirm whether you are a:

N/A

6. Are you happy to be contacted directly about your response? (please circle)

Yes

7. How did you hear about the consultation?

Multiple sources

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**8. Do you wish for your response to remain confidential?**

No

## Initial Questions

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

3

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

Yes

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

We welcome this consultation as an opportunity for positive reform and are in principle in favour of moving to some form of post-qualification admissions, which, depending on the model ultimately adopted, the University and Colleges of Cambridge believe could be compatible with our aim to admit the students with greatest academic potential to the University of Cambridge. We could, however, accommodate some models more easily than others, and any model would be easier to implement if there were greater detail in the way that A-level results in England are awarded and communicated. Both models included in the consultation would pose serious operational challenges to Cambridge and other institutions needing to use additional selection mechanisms such as interviews, at least in the form these models are presented, and Model 2 in particular does little to correct the mismatches in aspiration that occur within the current system.

Any new system should:

- (i) Boost applicants' chances of securing a place on the most appropriate course for them;
- (ii) Boost institutions' chances of securing the strongest and best-qualified applicants of all types, from the UK and elsewhere, while also increasing the intake of students from backgrounds that are currently underrepresented at the most selective universities;
- (iii) Reduce loss of numbers between application, offer and admission, and in so doing enable institutions to manage numbers better;
- (iv) Substantially increase transparency and fairness around the allocation of places;
- (v) Substantially increase the weighting given to grades achieved (as opposed to grades predicted);
- (vi) Eliminate unfair practices such as conditional-unconditional offer-making and the publication of inflated entry tariffs;

- (vii) Allow institutions to consider individual applications in detail, including contextualising them where appropriate with reference to personal or educational disadvantage, and to provide suitable support for incoming students (particularly those with disabilities, student parents, estranged students and care-leavers).

A well implemented model of PQA could remedy many of the shortcomings of the current system, but a poorly implemented system could be damaging, particularly for students from disadvantaged backgrounds and international students (as highlighted in the third section of this response). We urge the Department for Education to make full use of expert groups in the further development of any plans, to ensure that any new system meets the objectives listed above, and does not carry unfortunate unintended consequences. The University and Colleges of Cambridge are keen to be involved in any such groups and in ongoing consultation on PQA.

## PQA Delivery and Implementation

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

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

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

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

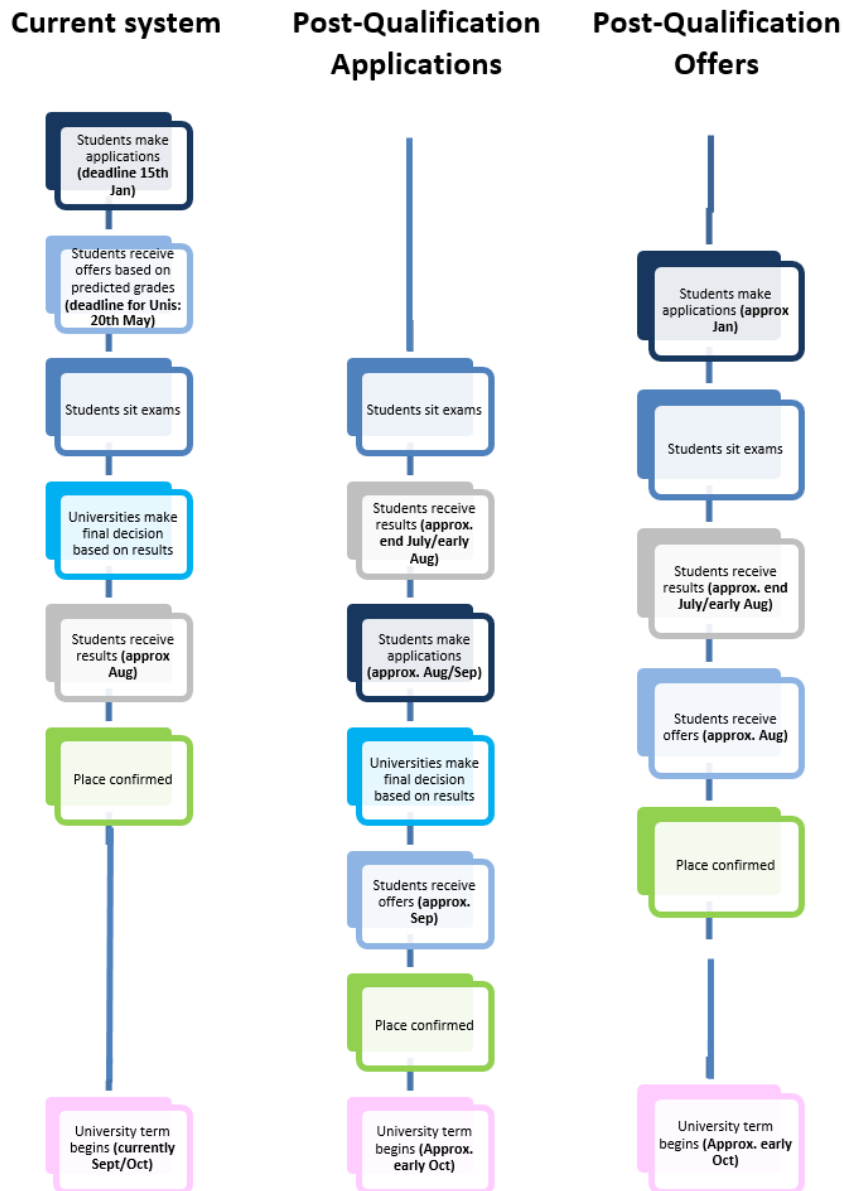
We agree that the issues outlined above seem to rule out a model in which post-qualification applications and offers take place from August onwards, with HE terms starting between November and January. However, Cambridge could accommodate a slightly delayed start to our autumn term.

Any work towards PQA needs to give special consideration to its impact on international applicants, especially in relation to the timetables for funding allocation in their countries of origin and at competitor institutions in the US.

These timetables will pose a challenge for both the PQA models suggested in this consultation.

## Illustrative models for a PQA system

To probe delivery further, we have set out below two illustrative models for a PQA system, which we believe are most feasible based on our analysis to date. Additional questions relevant to all delivery models are included later in this consultation document.



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

***'Post-qualification applications and offers', with a longer application window created by moving results dates forward to the end of July and HE term dates back to the first week of October.***

- Currently, A levels take place between May and June, and results are usually published on the Thursday closest to mid-August, with results of other Level 3 and vocational and technical qualifications (VTQs) generally published around the same time. The majority of HE providers welcome new starters to their institutions between mid-September and mid-October.
- By moving results dates forward to the end of July and starting the university term no earlier than the first week of October, a longer period between students getting their results and starting university could be carved out. This period should allow at least six weeks for the processing of applications, and the making of offers. It would also continue to allow universities to provide a 10 week first term before Christmas.
- We recognise that courses which require additional entrance tests, auditions and/or interviews will also need to be accommodated in this system, and we would welcome views on how this could be done.
- We are exploring different options on how to move results days earlier, with our preference being to compress the exam timetable, the marking period and the requirement for UCAS to receive results data well in advance of results day. Other options could include exams being held earlier but the feasibility and impact of this is something we want to explore in this consultation and through wider engagement.
- It is expected that under this model students could require support in choosing courses and completing their applications. This support could be targeted at specific groups of students and could be provided in a number of ways such as through support staff. However we recognise that if teachers were expected to provide this support there could be implications for their statutory terms and conditions. Our preference would be to avoid affecting teachers' conditions or workloads as much as possible and we would encourage respondents to provide their views and suggestions on how to avoid this.



## Questions for Model 1

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

- Better than the current system
- Worse than the current system
- No significant improvement

Any PQA model must work in the best interests of applicants and enable them to secure a place on the course that is the best match for them. On the basis of the information provided in the consultation, Model 1 offers a number of the benefits outlined on our “wish list” for PQA above, and should encourage ambitious applications in line with actual grades. However, without further detail from the Department for Education (and subsequent statistical modelling within the most selective institutions to establish how many applications we could receive under a post-qualification applications system), it is impossible for us to comment on its operational feasibility: for that reason, we have not ranked it as “better” or “worse” than the current system.

At present, we receive nuanced information about the attainment of students completing A-levels in Northern Ireland and Wales (in the form of UMS), and some indication of rank within each grade boundary for students completing Highers and Advanced Highers in Scotland (in the form of band scores). We do not receive comparable information about the attainment of students completing A-levels in England; if we did, we could place less weight on additional selection mechanisms such as written admissions assessments and interviews, although there would still be a need for these mechanisms, given the volume of competition for our places.

Administering written assessments, conducting interviews and collecting additional data about applicants typically takes over two months within the current system. Model 1 might enable us to compress that timeframe (particularly if (a) it resulted in fewer applications, (b) it were accompanied by more detail in A-level results releases in England and (c) written assessments were used across multiple institutions and/or completed alongside A-levels). Much would depend, however, on what proportion of the post-results day window students devoted to pre-application activity, and the number of institutions to which they were permitted to apply.

We have concerns about the level of assistance that schools would be able to offer their students outside term time (as detailed in Q.3 below), and this Model would evidently require us to re-think the forms of “bridging”, mentoring and transitional support that we ourselves offer to students during the latter stages of their A-level studies or in the gap between A-level results release and admission. We also have concerns about the time available to institutions for processes such as generating

student support plans for students with disabilities and DBS checks for Medics and Vets, as well the time available to students at non-Collegiate universities for securing accommodation.

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

Under Model 1, a PQA system could mean there is a shorter window between students getting their Level 3 (A Levels and equivalents) results and the deadline for applying to university, and they could be applying during the summer holidays.

Such a shift could potentially entail some loss of school teaching time and we would like further clarification as to how this would be managed in order to gauge the impact that it could have on applicants of different types. We would also like reassurance that Awarding Bodies would be able to release results to the revised timetable without eroding the fairness, consistency and/or reliability of their processes: a truncated timetable could have significant consequences for appeals.

That said, we would in principle welcome an earlier results day regardless of whether PQA were adopted across the sector, since even within the current system it could enable Cambridge to run a second, much smaller, application round specifically for disadvantaged students who had over-performed relative to expectations, including those who had not previously applied to the University, whom we are not able to assess from scratch within the current timeframe.

- 3. Please provide your views on the support applicants will need to make their applications to Higher Education under this model, and do you have views on when and how this could be offered? How could students best prepare their application for HE before they receive their Level 3 (A Level and equivalent) result?**

This can include reference to support for researching and completing applications, deciding which offers to accept, and support put in place before they start HE. It could also refer to ensuring that all applications are treated fairly by higher education providers.

We would welcome more detail from the Department for Education as to how it would envisage developing this aspect of Model 1, since we are concerned that if appropriate support and guidance is not built into the Model, it might in fact disadvantage the very groups of students it is intended to assist. We would also note that applicants' need for support is likely be affected by whether they have been provided with either (a) interim measures of attainment at Level 3 or (b) predicted grades, prior to results day (since this may determine how much targeted research is possible in advance).

We do not think students should delay all their Higher Education research until results day, which some might be tempted to do under a post-qualification applications system; careful thought needs to go into course choice, as well as the practical planning involved in taking up a place at a particular institution (which is especially important for students with disabilities, care leavers and estranged students, mature students, student parents and others with caring responsibilities). Cramming this research into the period between examinations and results release is similarly unlikely to lead to appropriate decision-making and would prevent many students from applying to courses that required them to complete an admissions assessment alongside A-levels (or equivalent); that period is also one in which teachers and advisers are less likely to be available to provide support, except in well-resourced schools. Both universities and schools would therefore need to think carefully about how to stage engagement with HE admissions and develop students' understanding, incrementally, across Years 12 and 13.

In some cases, it will be critical that schools provide advice and guidance to their students not only on applications but also on which offers to accept; this could be problematic in a PQA model in which the entire university admissions process is run during the summer period. The model as presented in the consultation risks advantaging students in well-resourced schools, while delivering limited benefits to students from less well-resourced schools who do better than expected at Level 3 and need advice on their applications.

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

The Cambridge admissions process is holistic: we consider each applicant in detail and make adjustments to cater for a range of needs, both during the phase between application and offer and ahead of entry. Ensuring that these adjustments are appropriate, both for students with disabilities and others, is time-consuming. Careful consideration of contextual information is required in order to evaluate fairly the academic profile of individual students and ensure that our offers are equitably distributed across different applicant types. Such contextualisation is, again, time-consuming and we are not at present convinced that it could be achieved to the outline schedule envisaged, or that students with disabilities could be easily accommodated in that schedule.

We are concerned that adoption of this model could undermine attempts to increase our intake of undergraduates from groups that are currently underrepresented at highly selective universities, including students from backgrounds with a limited tradition of progression to HE, mature students and student parents, all of whom may have more acute worries regarding the financial and practical implications of moving away from home; we would welcome further conversation with the Department for Education as to how these worries might be addressed.

Conversely, however, students who currently apply pre-qualification would be nine months further on in their academic development, with the academic confidence that comes from securing strong A-level results, and this might improve the success rates of some students from less advantaged backgrounds, which could include those on one-year Access to HE Diplomas and comparable courses.

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

The written admissions assessments or tests required for highly competitive courses could not obviously be accommodated at scale within this model, unless students completed them alongside their A-level or equivalent exams, or even earlier in the cycle. Unless particular tests were shared by a greater number of institutions, students would need to know in advance that they were planning to apply to a specific course at a university, thus removing any advantage the model might afford to students who do better than expected in their A-levels. We are concerned that applicants from schools with a limited tradition of progression to highly selective institutions, or applicants applying without the support of a school or college, would be less alert to the need to register and practise for admissions tests. We would be happy to supply the Department for Education with further information regarding the tests that we use in order to progress thinking on this element of PQA, and note that A-levels alone do not suffice to ensure appropriate preparation and competency for our Mathematics degree, which requires STEP.

In some subjects at Cambridge (and assuming no marked increase in applications), Model 1 could reduce the number of interviews conducted, since many of our applicants for less competitive courses do not currently go on to meet the entry requirements. However, it is still implausible that we would be able to interview at scale for our more competitive courses with the appropriate care and attention to individual circumstance (attention which in our current system often benefits students from less advantaged backgrounds considerably) in the short timeframe available to us in Model 1, as presented in the consultation. Conducting interviews at scale in the summer period also risks cutting across the main period of residential outreach activity and diverting attention from students in Year 11 and 12 to those in Year 13. There is a risk that this model could compromise our ability to attract *future* cohorts of WP applicants: applicants who might not, without our interventions, consider Cambridge even in a PQA system.

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

- Yes
- No
- Not sure

**If yes, what implications and why?**

This model does not take into account international applicants, who currently apply to Cambridge through UCAS and are considered as part of the overall gathered field. It is also unclear how it would accommodate the needs of students deciding to take a gap year and apply in the round after their Level 3 results release. Any future system should ideally be designed to ensure that UCAS continues to meet everyone's needs.

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

- Yes
- No
- Not sure

**If yes, what limits and why?**

It is important that there are limits on the number of courses to which students can apply in the first instance, just as there are within the current UCAS system, otherwise some institutions could be overwhelmed and others undersubscribed or subjected to considerable uncertainty through loss of numbers. Students who had not secured an offer from one of their preference institutions could potentially be permitted an additional choice from among those institutions with available places via a function similar to UCAS Extra.

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

Our current process takes over two months to run from application to offer, with further stages post-offer, particularly for students with disabilities and international students (including fee status assessments, the provision of financial guarantees and visa applications). The time required to process applications under this model would depend on the level of granularity available for A-level results in England, the opportunity for candidates to complete additional written assessments pre-application, and the overall size of the field of applications we were likely to receive. On each of these points, further insight from the Department for Education would be welcome.

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

This model has serious implications for Medicine, which requires additional selection mechanisms at all institutions, including DBS checks, and has more complex needs in terms of distributing applicants across the sector than any other course due to strict government quotas and financial penalties for over-recruitment.

Both Model 1 and Model 2 could have unintended consequences for students with disabilities and international students, as outlined elsewhere in this response.

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

### ***Applications made during term-time (as now), but offers made after Results Day***

- This model could be implemented with smaller changes to results day and University start dates. Alternatively, as with model 1, it could create a longer window of approximately 9-10 weeks for the making and accepting of offers.
- Students apply in the normal way, and at more or less the same time as they currently do. However, applications are held in the system until the results dates (which could be brought forward by a week or two) and offers are only made once results are known.
- Under this model students would require significantly less support over the summer with their applications. However, some students may require support in deciding which offer to accept. As under model 1 we recognise there are potential implications for teachers; however our preference is to minimise any impact and avoid requiring any changes to teachers’ statutory terms and conditions. We would encourage respondent to provide views and suggestions on this issue.
- In order to ensure that no offers are made in advance of the results day, we envisage that the full application could be held by a third party such as UCAS, and then released after Results Day, with some headline data released to providers to enable the planning of intakes, and facilitation of additional recruitment procedures, where these are necessary. So, for example, we will want to look at ways in which courses that require auditions and/or interviews can be accommodated before results days. We would particularly welcome thoughts on how this could work in practice. We would also welcome views on how we might ensure that there is a level playing field between providers and providers are prevented from bypassing the agreed system.
- This model would have implications for, amongst others, higher education providers and sector bodies, schools, FE colleges, students, teachers and organisations involved in the delivery of qualifications. Through this consultation we plan to gather evidence to understand these implications in more detail and to minimise any adverse effects should we move forward with implementing a PQA system.

## Questions for Model 2

Under Model 2, students may not be provided with predicted grades to apply to HE with.

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

- Better than the current system
- Worse than the current system
- No significant improvement

It is unclear from the consultation what “headline data” might be released to providers to facilitate additional recruitment procedures, in Model 2. Without further clarification on this issue, it is not possible for us to comment fully on its operational feasibility: for that reason, we have again chosen not to rank it as “better” or “worse” than the current system.

A version of Model 2 in which all applications were “held in the system” and not released to institutions until results day would present many of the same risks and challenges to our selection processes as Model 1. Unlike Model 1, it does little to disincentivize institutions from publishing inflated entry tariffs as a means of recruitment and while students would be able to access term-time support in submitting their applications, they would then face a very long period of silence before learning the outcomes.

A modified version of Model 2 in which applications were released to institutions several months ahead of the offer period might offer some improvement on the current system. It could boost perceptions of fairness, as applicants would only receive offers once they had received their results and predicted grades might play a less significant role, at sector level. However, it offers no improvement for students who are under-predicted and/or under-confident and do not apply to highly selective institutions in the first place. It also pre-supposes that predicted grades are key to decision-making at every institution: this is not the case at Cambridge, where they do not enable us to differentiate between our many highly qualified applicants and are used only in conjunction with other evidence, as part of a holistic assessment. We would need to conduct admissions tests (which are used to assist in shortlisting for interview, or at interview) and interviews themselves on our normal schedule, but potentially on a much larger scale, given that the model could lead to a significant increase in applications, including speculative applications (especially if candidates themselves were denied predicted grades); this could compromise our capacity to consider individual circumstances with the care and attention that we do at present.



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

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

In Model 2 as we understand it, the application process is similar to the current one. This could result in the same mismatches in aspiration that occur in some cases at present, as well as discrepancies in access to the resources necessary to make a competitive application to highly selective institutions (for example, interview advice and test practice).

In some cases, it is critical that schools provide advice and guidance to their students on which offers to accept; this is as problematic in the version of Model 2 presented in the consultation as it is in Model 1. Model 2 risks advantaging students in well-resourced schools, while delivering limited benefits to students from less well-resourced schools who do better than expected at Level 3. It is also unclear how any version of Clearing (which currently accommodates such students along with Adjustment) could operate in such a model.

We also anticipate that students would require greater support in coping with uncertainty between application and offer than is currently the case, given the protracted interval.

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

Many of the concerns raised under Model 1 also apply to Model 2, and acutely so if providers are not given access to full applications well in advance of offer-making. Even in a variant of Model 2 in which institutions had more time to make adjustments in the assessment process, some groups of students would still lack sufficient information about their likely HE institution to make the practical arrangements necessary for a successful transition.

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

It is not clear that ongoing assessment or mock exam grades could provide a consistently reliable guide for students seeking to make an appropriate choice of HE course and institution, unless there was an element of moderation external to schools.

GCSEs could aid students, but these (even more than A-level results) are context-sensitive, and a benchmark of attainment closer to the point of application would be more useful, especially for students who start to flourish later in their school career and for mature students who took GCSEs many years ago. There are interim attainment measures in Scotland, Wales and Northern Ireland (in the form of Highers and modular AS-levels). Some schools in England still enter students for linear AS-levels, and greater take-up of linear AS-levels would undoubtedly be helpful, though they do not in their current form allow for finely grained ranking of students within each grade boundary. Re-introducing a coursework element into A-levels would assist candidates in making informed decisions about their options for future study. Decision-making might also be supported by early entry for benchmarked assessments such as the BMAT or STEP.

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

- Yes
- No
- Not sure

**If yes, what implications and why?**

Like Model 1, this model does not take into account international applicants, and it is unclear how it would accommodate the needs of students deciding to take a gap year and apply in the round after their Level 3 results release.

Institutions need be able to manage numbers effectively, and there is a risk that the system would be circumvented by some HE providers in order to plan ahead and “secure” applicants (including international applicants) who might otherwise choose to go elsewhere in August or earlier. It is not clear that providers could be prevented from adopting such an approach without compromising institutional autonomy.

In a variant of Model 2 in which institutions could access applications ahead of results day, we would be concerned about the potential for very well-resourced schools to offer their students the opportunity to take additional external examinations at the end of Year 12 (including US SATs and Advanced Placements) in order to secure a competitive edge over other applicants, and present as quasi post-qualification candidates early in the process, particularly if some institutions were circumventing the centralised admissions service. Widespread take-up of SATs and APs within English schools as a substitute for school A-level predictions might also lead to institutions losing more UK students to overseas competitors.

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

- Yes
- No
- Not sure

**If yes, what limits and why?**

As with Model 1 – see above.

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

If we did not have access to applications before results day, the challenges would be similar to those outlined for Model 1. If we did have access to applications before results day, we would anticipate timing similar to our current process, which takes over two months to run from application to offer, with further stages post-offer.

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

Under Model 2, offers would be made to applicants after results day, outside of term time.

In a variant of Model 2 in which institutions could not access applications ahead of results day, the same challenges posed by Model 1 would arise. In a variant of Model 2 in which institutions could access applications ahead of results day, admissions tests and interviews could in principle be accommodated on the current timescale, assuming that we were not confronted with a significant increase in applications.

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

See response to Q3 on Model 1 above

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

As with Model 1.

## Further Questions

A PQA system could remove the requirement for school and college teachers to provide predicted grades for students applying to Higher Education through UCAS applications.

Implementing PQA could have practical implications across the education system, not only Higher Education. Depending on how PQA was delivered, it could mean bringing Level 3 "Results Days" forward in schools and further education colleges, potentially making changes to examination dates and setting up different support arrangements for students applying to Higher Education. For universities, the processing of applications may need to be done over a shorter period, and we are looking for views on how application processes that typically involve information in addition to Level 3 results, such as auditions, interviews or additional exams, can be incorporated into PQA delivery.

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

We would like to see further investigation into the PQA systems in use in other countries, particularly those that have highly selective institutions, and those that have several rounds of offer-making. One option that is worth further consideration, and which could meet the needs of all applicant groups, is a staggered or multi-phased system of offer-making. Our own research into models of Post-Qualification Admissions suggests that a model including two rounds of application might be appropriate to the Cambridge context. Alternatively, staggered or multi-phased offer-making could be incorporated into a version of Model 1 or a version of Model 2. We could, for example, envisage a variant of Model 2 in which most applications are submitted and assessed relatively early in the admissions cycle, with some students receiving an offer within, say, three months of application (either because they completed their Level 3 qualifications the previous year and are taking time out, or because they are international students taking examinations at a different point in the year from UK students. This would be similar to the current arrangements for post-qualification applicants. Where a firm offer is not possible or feasible, applications would be held in the system or "waitlisted" until the summer, while others (deemed uncompetitive regardless of Level 3 qualifications) would be declined, but enabled by the system to replace their application to Cambridge with an application to another institution having gained a better sense of the strength of their academic profile. Working in this way, with a substantial waitlist of pre-assessed candidates receiving offers only after Level 3 results day, would ensure that candidates who develop late in their school career are not penalized by early assessment, and increase both the weighting given to actual examination grades and perceptions of fairness – both of which, we consider, are critical.

The University and Colleges of Cambridge would be glad to share the outputs of our research into PQA and to engage in ongoing consultation over the possible forms it could take.

The vast majority of applications to undergraduate courses are currently processed through UCAS. Students who apply to Oxford or Cambridge and for medicine, veterinary and allied courses make their applications by October 15 of the year before they start. Applications for all other courses have to be made by January 15 of the following year. As part of the application process, teachers supply references and predicted grades, and applicants write a personal statement. Higher education providers receive applications once the deadlines have passed, and can start to make offers through the UCAS system from then onwards.

In recent years, some, including The Sutton Trust and the HE Access Network have argued for the removal of personal statements from the application process. They argue that an applicant's school type is a key predictor of the quality of their personal statement, with those from more advantaged educational backgrounds more likely to receive support and guidance. Evidence shows that in analysis of statements written by young people who would go on to achieve identical A level results, clear writing errors were three times more common in the personal statements of applicants from sixth form colleges and comprehensive schools, than in statements of applicants from independent schools.<sup>1</sup>

The differences in the written quality of the statements was, in the authors' view, likely to be a result of the differing levels of support and guidance rather than academic ability.

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

- Yes
- No
- Not sure

Please provide a reason for your answer.

There are serious issues with the personal statement in its current format, which favours students with cultural capital (whether school- or family-conferred), and students with significant support, over those with neither. It should be noted that Cambridge does not formally assess or score personal statements as such: they are a source of information rather than a deciding factor in our selection process. We would not wish to see applicants denied an opportunity to highlight particular achievements and experience (which may not fit easily into the categories otherwise available on the UCAS application). Removing statements altogether would reduce

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<sup>1</sup> Sutton Trust. 2012. "Is the personal statement a fair way to assess university applicants?"

the detail available for judging the merits of an application, especially for vocational courses where prior experience is important. However, we would prefer students to undertake a more structured, less free-form, exercise, responding to clear questions or prompts.

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

It is unrealistic to expect that schools will give students no indication of what they are likely to achieve at A-level (or equivalent). Even in Model 1, most students would start investigating higher education choices well in advance of results day (and in all likelihood examinations), and we and other institutions would encourage them to do so via our outreach activities; they would require some steer from schools in order to ensure that the number of courses/institutions they research is manageable. In Model 2, students would also require some guidance from schools in order to structure their research and increase the probability that they received an offer from one of the institutions to which they applied in the first instance. Cambridge and other highly selective institutions needing pre-results day access to applications in order to run assessments and interviews might not have capacity to consider every candidate in detail, particularly if application numbers rose and there was a compressed timeframe for decision-making. Some form of “filter” would therefore have to be employed: either an informal school prediction (which carries the same risks of slippage between a teacher’s judgement of potential, our assessment of potential and a student’s eventual examination performance, that exists at present) a school transcript (which could result in ongoing stress for students, since it raises the stakes around internal school assessments) or earlier evidence of attainment, in most cases GCSEs (which are more context-sensitive than A-levels), or qualifications such as US SATs or APs (which are generally available only to the most advantaged students).

## **Students currently outside the UCAS system**

### **a) International Students**

This country has many world-leading universities, and it attracts great numbers of students from overseas as a result. International students contribute in turn to the rich diversity of the student experience as well as the quality and variety of universities’ provision and research, to the benefit of the whole student population. Of the 1.5 million undergraduate students enrolled at English HEIs in 2018/19, 222,000 (15%) are international, 60% of which applied through UCAS. We would want to be sure that any change to the admissions system does not create an unnecessary barrier to the continued recruitment of highly valued international students. International students are not currently in scope of proposed PQA. This is due to the significant variances in exam timetabling around the world which means a considerable proportion of international students are unable to apply using the UCAS systems and associated deadlines. 50%

of international students are postgraduates, and so would be out of scope in a PQA system. In addition, international students can only apply for a visa once they have their university offer in-hand, and including them in a PQA system would truncate the amount of time available for visa processing and application.

#### **b) Part-time and mature students**

Not all domestic students apply through the UCAS system. There are some who apply direct to universities, and there are a few small higher education providers who do not use UCAS at all. In the case of mature students, we would not want to prevent providers from recruiting them directly, if that makes most sense for them.

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

At present, all applications for undergraduate study at the University of Cambridge, including applications from international students, come via UCAS and are considered as part of the same gathered field. A move to a PQA system that prevented students from submitting applications to institutions via UCAS until the summer, or that prevented institutions from making offers via UCAS until the summer, could have serious and damaging consequences for international recruitment (since international students often need to apply for and make decisions regarding funding opportunities much earlier in the year). To that extent, it is logical to exclude international students from the scope of the PQA models proposed.

However, that exclusion itself has serious consequences. In the event that either model was implemented in the manner suggested, Cambridge might well have to accept applications from international students directly, to a different timeframe, or risk losing them altogether. Running direct applications and admissions in parallel with UCAS applications and admissions would significantly increase the cost and complexity of our processes and make it harder to ensure that all candidates received comparable levels of care and consideration, since our gathered field would be split administratively. If every institution with an interest in international recruitment found itself in a similar position, there is a risk that some might choose to circumvent UCAS altogether, with detrimental effects for many UK candidates, and advantageous effects for others (particularly those able to “present” in the same way as international students by taking US qualifications).

International recruitment brings huge benefit to the UK not only as a source of revenue to universities, but also, via the post-study visa, as a source of professional talent and enterprise. Students from other countries add depth and breadth to our undergraduate community; as a global institution, we wish to admit the very best candidates from around the world.

We would welcome a sector-wide analysis of the consequences of moving to a PQA system for potential international applicants and how international application fields might change under either of the two models described. We would also like further information as to (i) how international students would be defined within a PQA system, since those studying for A-levels (or equivalent) in the UK could potentially be either advantaged or disadvantaged by following a different timeline for applications and (ii) how UCAS might accommodate international students' needs in the event that PQA were implemented.

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

All applications for undergraduate study at the University of Cambridge come via UCAS: we do not admit full-time undergraduates via any other route. In the event that either model was implemented in the manner suggested, however, we might have to accept applications from students directly, as outlined in Q4 above.

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

We are in favour of PQA in principle and there is support within the University and Colleges of Cambridge for testing the feasibility of different models further.

In our view, a version of PQA that genuinely delivers on the objectives that have been set out must include changes to the way in which A-level results are awarded and communicated in England, in order to provide more detailed evidence of attainment than simply overall A-Level grades on the scale A\*-E. At the very least, examination boards should be required to be more consistent in the scaling of numerical raw scores, and we encourage continued discussion between boards and universities as to how to ensure that A-levels become more intellectually challenging at the top end, so that students cannot achieve high marks simply through rote learning.

Careful consideration also needs to be given to the impact of these proposals on students following different qualifications, and the effect that they might have on uptake to foundation year programmes (which have historically been more flexible in entry requirements).



We would like to see the Department for Education (i) establish expert working groups to assist it in progressing PQA policy, rather than mandating a particular system prematurely and (ii) work closely with schools to ensure that any future proposals work for teachers and students (especially in the state sector, and especially for schools and students experiencing above-average disadvantage). We are keen to be involved in the development of the ideas outlined in the consultation.

## Public Sector Equality Duty (PSED)

*The full PSED assessment can be found on the consultation host page.*

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

Comments on the effect that these proposals might have on mature students, students with disabilities and student-parents (who are disproportionately likely to be women) can be found in our responses to Questions 3, 4 and 12 within the Model sections of this document.