

ASSOCIATION OF TEACHERS AND LECTURERS

7 NORTHUMBERLAND STREET, LONDON WC2N 5RD TEL: 020-7930-6441 FAX: 020-7930-1359
e-mail: info@atl.org.uk web site: http://www.atl.org.uk VAT REG NO 539 0866 17
GENERAL SECRETARY Dr MARY BOUSTED B.A.(Hons) PhD



***The Admissions Process Review – a UCAS consultation
Response from the Association of Teachers and Lecturers
Date: 31 January 2012***

ATL, the education union, is an independent, registered trade union and professional association, representing approximately 160,000 teachers, head teachers, lecturers and support staff in maintained and independent nurseries, schools, sixth form, tertiary and further education colleges in the United Kingdom. AMiE is the trade union and professional association for leaders and managers in colleges and schools, and is a distinct section of ATL. We recognise the link between education policy and members' conditions of service.

ATL exists to help members, as their careers develop, through first rate research, advice, information and legal advice. Our evidence-based policy making enables us to campaign and negotiate locally and nationally.

ATL is affiliated to the Trades Union Congress (TUC), Irish Congress of Trade Unions (ICTU), European Trade Union Committee for Education (ETUCE) and Education International (EI). ATL is not affiliated to any political party and seeks to work constructively with all the main political parties.

ATL policy

ATL believes that teachers as professionals must be recognised for their knowledge, expertise and judgment, at the level of the individual pupil and in articulating the role of education in increasing social justice. Within light national parameters, development of the education system should take place at a local level: the curriculum should be developed in partnership with local stakeholders; assessment should be carried out through local professional networks. Schools and colleges should be increasingly encouraged to work collaboratively to offer excellent teaching and learning, and to support pupils' well-being, across a local area. Accountability mechanisms should be developed so that there is a proper balance of accountability to national government and the local community, which supports collaboration rather than competition.

Executive Summary

- It is important to ATL that, at all levels, our education system serves ALL young people. Whatever their background, whatever their talents, every teenager (and indeed older learners) must be able to see higher education as an option, should they deem it suitable for themselves.
- ATL broadly supports the principles at the heart of the Admissions Process Review and retains its support for the fairness principle behind post-qualification applications.

- Information, advice and guidance is a crucial part of the HE applications process and the widening participation agenda. We are deeply concerned about the government's dismantling of such support for young people. The proposed model's reliance on applicants receiving support from their school or college must be seen in the context of whether high quality advice and guidance will actually be available.
- A new model for applications to HE must be developed by considering the perspective of potential applicants. The system must not be overly complex, must not pose dilemmas for students, nor must it be open to gaming. We are concerned that the overlapping application windows potentially have this effect.
- Squeezing the teaching time and examination time for existing post-16 qualifications looks to be very difficult. There is concern amongst ATL's members that the proposal UCAS has made asks for compromise from, and creates difficulties for, schools and colleges without comparable compromise in the timetable from HEIs.
- ATL proposes an amended model of post-qualification applications which adopts a January start for the majority of undergraduate degrees, and urges UCAS to consider this more thoroughly.

ATL Response

It is important to ATL that, at all levels, our education system serves ALL young people. Whatever their background, whatever their talents, every teenager (and indeed older learners) must be able to see higher education as an option, should they deem it suitable for themselves. There should be a clear route as to how they can secure a place in HE and whatever applications process UCAS uses will be an important part of ensuring fair access, flexibility and choice for learners.

This response sets out our support for the principles of post-qualification applications to HE (PQA), highlights our strong belief that fairness and support are essential features of any application process, looks at how the UCAS proposal will work, and suggests adaptations to the proposal in order to have the positive impact desired.

Principles of the Review and of post-qualification applications

ATL broadly supports the principles at the heart of the Admissions Process Review (APR). We think that fairness and access for all are indisputably essential to developing a new applications and admissions process. To say that the process must 'cope with' a wide diversity of applicants appears unambitious – any finalised model must ensure that it does not facilitate disadvantage. We acknowledge that UCAS has committed to undertake an equality impact assessment at a later date but urge this analysis to take place and be shared as early as possible.

It is encouraging that from the start this project considered 'the needs of all applicants to be at the heart of the system' to be a crucial dimension. This is particularly true when reflecting upon the Review's own findings of the existing process that there are circumstances when decisions from

higher education institutions (HEIs) are based upon numbers or targets, rather than students' interests.¹ We suggest though that it would be more appropriate to bear in mind not applicants but *potential* applicants. We know that barriers to higher education exist and it would be wise in the design of the application process itself to consider what might deter certain groups or individuals from beginning or completing an application.² Change must open up HE to people of different backgrounds, rather than merely alter the process.

ATL has in the past opposed the use of predicted grades in university applications on the grounds that they particularly disadvantage pupils from the lowest socio-economic groups and those from backgrounds with less of a tradition of attending higher education. We retain our support for this aspect of the fairness principle behind post-qualification applications.

Best serving young people with fairness and flexibility in the applications process

The evidence presented by the Review (e.g. less than 10% of applicants receive 3 accurate predictions) gives us further reason to support a system that moves away from predicted grades. We believe that applying with secured qualifications and grades raises, not diminishes, aspiration. We concur with the view that having more time leads to better, more committed, decision-making whilst it adds flexibility for young people who may currently hedge their bets.

Fairness for ATL means an education system that teaches a broad range of knowledge and skills through different forms of learning and assessment. As children get older it is appropriate that they are helped to excel in areas where their talents lie – this means a suitable range of qualification available to them, particularly post-16. We agree that an application system with 'flexibility to support different pathways to higher education' sounds great, but ask how is this going to be achieved? Issues around the value of many non-A Level courses remain live – can UCAS and its member universities ensure the application and admissions system plays a role in redressing this? We also believe more thought should be given to ensuring those students awaiting the later publication of level 2 results are not disadvantaged under the new model. We caution against reintroducing an element of conditional offer-making in these circumstances which will create uncertainty for individuals whilst many around them will be assured of their destination early. It may be possible for awarding organisations to pledge to mark these students' papers early and communicate results ahead of the existing level 2 timetable. However, the impact of the proposed changes on examination and results timetables for qualifications typically sat pre-16, requires further thought in its own right.

Some young people will realise this, many may not, but the decision they will take about an HE course will be amongst the biggest of their lives so far. It is reasonable then to allow a certain amount of choice and flexibility – even despite later applications – in Apply 2. The 35,000 calls received regarding changing courses and swapping decisions can undoubtedly be

¹ See paragraph 13.1, page 23

² Indeed the Review itself recognises this should be a concern: paragraph 24.3, page 36

reduced by post-qualification applications but many applicants will still be unsure of themselves and may need or want a number of different options on the table. This is likely to be truer of those unsure whether university is for them, or from families without experience of HE, or concerned about the financial implications of their decision. Being able to write more than one personal statement under the new system is undoubtedly helpful but we think UCAS should be careful about restricting choice down to just two courses. Choice comes in different forms and students have indicated that a second option, rather than merely a backstop can be a useful approach. But we don't agree that 'security' choices are no longer needed. Many students – who the fairness principle is trying to aid – will lack the confidence of putting all their eggs in the basket of their grades. We know that some applicants already pass the grade benchmark for given courses and don't get a place.³

The APR consultation paper makes reference on a number of occasions to the proposal's timetable providing extra time pre-application for (potential) applicants to engage in an extended period of research which would allow them to 'build relationships' with HEIs. ATL is significantly concerned that the latter emphasis benefits a certain type of young person or people from particular backgrounds in which 'networking' is an inherited or developed skill. Support would need to be given to schools and colleges to help develop relevant skills for this part of the process – it should not be taken for granted that all young people have this ability, nor necessarily the confidence to use it. It appears to us that this would be crucial to achieving the fairness aim.

ATL thinks it is right for HEIs to look beyond examination grades and base decisions on a broader picture of candidates, and we acknowledge the challenge in uncovering this. We think that it is important that students are judged not just on exam grades achieved (which should not be the be all and end all, and may be a product not just of the individual but the context their school or college works in) but on their potential to benefit from and succeed in HE. However, it is absolutely essential that there is full transparency from institutions as to what else they are looking for from candidate for HE courses – no assumptions should be made that could disadvantage those least familiar with HE. Information on how admissions offices take their decisions on applications must be available early so schools and colleges can help their pupils prepare.

It is essential that outstanding information, advice and guidance is provided to all potential applicants

With wider considerations of admissions tutors a factor, and the skills – as well as knowledge – that applicants will need important to their success in applying, it is obvious that a significant level of support is going to need to be provided at school and college.

Information, advice and guidance is a crucial part of the HE applications process and the widening participation agenda. We have been deeply concerned about the government's dismantling of such support for young people over the last year and a half. We have low expectations of the

³ See page 23 of the APR consultation paper

forthcoming National Careers Service and the quality and reach it will have.

The APR was clear that 'good advice optimises applications', and ATL agrees. Yet the proposed model's reliance on applicants receiving support from their school or college must be seen in the context of whether high quality advice and guidance will actually be available. The consultation paper emphasises the importance of applicants doing robust research early so that PQA goes smoothly once exams have been sat and then once results are communicated. It must be understood that different students will need different levels of support, and that this must be in place for PQA to fulfil its potential in offering a fairer system of applications.

How will the proposed model work?

A new model for applications to HE must be developed by considering the perspective of potential applicants first and foremost, and ensuring (aside from the variable grades they will now apply with) a level playing field for all candidates for places on an HE course. Aspects of how this model will work for staff in schools, colleges and universities, and how it will work for HEIs is likely to also impact upon whether it delivers a fair opportunity for all.

How will it work for potential applicants?

There are a few places in the proposed model with great strain on time, or worse, potential disadvantage because of the timing and sequencing of the many stages of the process. Though not a new problem, there is still an issue with appeals against qualification grading not really fitting into the system. This can have severe effects on candidates, often through no fault of their own. It appears as though an appeal would potentially rule you out beyond Apply 2's equal consideration deadline. It is true too that this particular way of operating PQA would leave a particularly short period for successful applicants arranging accommodation. The numbers game that university accommodation offices play would be based upon less reliable data pre-results, and with less notice of accommodation preferences later on in the process.

It is not clear whether the final dates stated for Apply 2 and Apply 3, are the absolute latest for offers to be made, or whether offers under the respective windows will all come at this point. This sort of key detail needs to be explicitly clear if a new system goes live to students.

It is assumed that most applicants who are taking their post-16 qualifications would use Apply 2. However, for those that don't – and there may be a wide variety of reasons from personal illness to family caring responsibilities – the level of essential support they can call upon during Apply 3 will be severely hampered by the summer holidays and the school and college staff from whom they would seek help not being at work.

Opening up the UCAS applications platform early, encouraging research throughout the year, offering a 'wishlist' feature built up over time, and feeding interest data to HEIs all seems eminently sensible and will play a part in applicants preparing for different outcomes and maximising their

chances of success in application or interview. However, it will be absolutely essential that there is equalised support and advice on offer for utilising this, and the time and resources don't serve the already advantaged better than those in less fortunate circumstances. Tying together registration with UCAS and applications for financial support is also sound. Sad as it is, today decisions taken by many on whether to apply for university are contingent upon money. This 'one stop shop' must be fully tested and perfect in operation – the potential for it going wrong would appear to be enormous with potentially catastrophic consequences.

UCAS must ensure that opportunities for gaming the new system are eradicated at this stage

With three overlapping application windows it is extremely important to guard against this model becoming or, equally, appearing to be, overly complex. Complexity can have the detrimental consequences of being off-putting and/or inducing tactically poor decisions.

Though not fundamentally flawed, ATL is concerned that the concurrent application windows present too much opportunity for confusion or encourage gaming amongst candidates. Some tweaks then might be needed, and the exact details of the service level agreements could be central to making the system work for potential applicants.

At the heart of the complexity is the presentation of more than one application window which make logical sense for potential applicants to use. This would pose opportunities for 'well-advised' students to make strategic applications, an advantage this model of PQA is supposedly designed to eradicate. Some potential scenarios include:

- For students sitting exams in the year of entry to HE, if opt for Apply 1 then they could secure a place before the majority who await Apply 2's equal consideration deadline
- On day one of Apply 3 a candidate appears better off (because of that day's gathered field) not applying via Apply 2, unless they want two parallel applications. This equates to too much strategy at play, weighing up the advantage of a gathered field against the benefit of multiple applications. In addition, which will answer first? Our reading of the timescales in the proposal is that Apply 2 responses could be as late as two months afterwards, whereas the service level agreement could mean Apply 3 answers arrive much quicker.

The first scenarios imply the need for service level agreements under Apply 1 to include an equal or longer response time than the gap between the opening of Apply 2 and its equal consideration deadline. This would seem counter to the point of holding a service level agreement which should really be about maximum response times. The other way around this problem would be to only allow candidates for non-traditional start dates to use Apply 1 once that year's exam results are released.

In the latter scenario, the system would need Apply 2 to also utilise a service level agreement, though it begs the question why Apply 2 and Apply 3 are running at the same time. Why not close Apply 2 at the equal consideration deadline.

There needs to be clear added value to running the windows concurrently. We believe these are sticking points that need working through and that service level agreements must be designed well, but that the issues we have highlighted should not be cause to abandon the move to a system of PQA.

How will it work for HEIs?

Significant thought must be given as to how universities will choose to use a PQA system. With every applicant having passed the grade barrier, it may cause universities to look closely at other factors. This is a positive move if it downplays the primacy of grades and high stakes nature of exams for pupils. However, if access to work experience / summer internships continue to be dominated by the well-off, well-connected, and geographically lucky then there is a huge downside. The counter to this would be that because an application could not / would not be made without sufficient grades we already give the exam results a certain primacy in decision-making. Is this fair on everyone, or will it further disadvantage some who struggle to do well in exams? Much depends on the future development of applicant numbers against HE places.

There may be a potential problem with how the application windows have been proposed. Is there a mechanism in place that prevents HEIs from offering all their places on a course during Apply 1? It is not clear why this would not be in their interests if they get a lot of suitable candidates, yet it offers a clear disadvantage to those applying 'in-year' who need to wait for exam results and the opening of Apply 2. Percentage quotas may be necessary to avoid the common scenario of students completing their A Levels and not being able to apply to courses of their choice. It is not difficult to see this ending up in a situation where everyone is pushed into applying in the academic year after they have completed sixth form or FE study.

How will it work for school, college and university staff?

Accountability measures are a huge issue for schools and colleges. Thought needs to be given to the extent of teachers' and lecturers' responsibilities for their pupils' destinations. Though this has always been an issue it could be heightened if HEIs, receiving a large majority of applications with the same or very similarly graded qualifications, do take the route of using other factors to make decisions. To what extent should teachers and lecturers, through destinations data, be held responsible for pupils' hobbies and personalities?

School and college staff would likely welcome the publication of results for A Levels etc moving from the summer holidays to term-time. This is qualified though by the GCSE results day still taking place in August and the shift to summer of the heaviest workload of admissions staff in HE.

We are concerned that the changes to the exam period would put at risk the contracts of staff in FE colleges. These institutions are already questioning the value of staff post-exams and though there is huge value to be added in offering students support in their HE applications in this period, the extra weeks before summer may lead to severe consequences

for staff in the sector. Trying to avoid such a situation could impact upon which courses are chosen to be offered in FE institutions.

To counter the varied quality of references that accompany applications, which the APR highlights, UCAS and universities should establish widespread, high quality CPD in providing the most useful references, visiting staff in schools and colleges as part of their widening participation programmes. This would offer benefits to applicants, education staff and HEIs.

It is questionable, amidst the context of weakened IAG provision, whether teaching staff in schools and colleges are best-placed and most able to deliver the support and guidance which applicants will require.

The impact on post-16 teaching and timetabling of examinations

The biggest impact for staff in schools and colleges, of the proposal as it stands, is upon the curriculum. The pressure on syllabuses and the concentration of exams means that squeezing the teaching time and examination time for existing post-16 qualifications looks to be difficult, to varying degrees, across the nations of the UK.

There is concern amongst ATL's members that the proposal UCAS has made asks for compromise from, and creates difficulties for, schools and colleges without comparable compromise in the timetable from HEIs.

If teaching time for courses is squeezed in this way the disadvantage this may cause some pupils, who might see their grades slip compared to students within the current system, would counter the benefits that PQA offers. With an exam period two weeks shorter, we are asking more of students in their assessment – balancing revision for different papers more closely together. This also may disadvantage some and it should be borne in mind that assessment is not the sole indicator of ability or potential.

This model of post-qualification applications looks like it would cause a redesign of A Levels to make them fit the shortened time available. This will raise questions over whether this is educationally the right thing to do. Though proper consideration would need to be given to this, possibly involving the qualifications regulator, it is possible that the forthcoming switch from modular to end-of-course only examinations in A Levels and the consequences regarding results could provide some mitigation of the squeeze on time. Though ATL has not supported these changes to A Level assessment we recognise they are about to be made and could save sufficient time (from preparing for and sitting multiple exams) over the course. This does not of course provide an answer for all post-16 qualifications – many vocational courses are already longer than the weeks taken by A Levels and their exams.

Though ATL backs the principles of PQA, the practicalities are hugely important. Continued support from teachers and lecturers could be contingent on greater flexibility from HEIs.

Other issues to consider

We think it will be important for UCAS, with the Office for Fair Access, to monitor the impact of a new, post-qualification, system with particular attention to fairness, and a more balanced intake, include strong representation from students from 'non-traditional' backgrounds, at Russell Group universities.

An additional feature that will help all applicants, but particularly those of low confidence or with little family experience of applying for university, is a commitment to feedback from HEIs for unsuccessful applications. The concurrent windows with the option of reapplying mean that more than ever, this will be useful for those with the aspiration of entering HE. We believe that the drastic reduction in 'transactions' which the APR has identified provide space for this service to be guaranteed.

Though this will be a small or non-existent problem for FE and sixth form colleges, the proposal creates particular complexity for schools with regards the timing of GCSEs. Would this model, practically speaking, require schools to also shift the examination timetable for GCSEs? Without which, the period a centre was running exams, rather than full school timetabled teaching, would be extended significantly. Would it also be preferable for the awarding organisations to then move the communication and publication of GCSE (and equivalent) results out of the summer holidays aligned with the proposed timing of A Level (and equivalent) results? The ramifications for such a big change require considerable thought and, likely, further research.

We caution against UCAS and HEIs discounting teething problems. The consultation paper suggests that enquiries to each should drop. We would agree that this should be expected in the long-run – providing the system is not too complex – but there could be additional staffing needs as users get used to the system in its initial years. Service level agreements will be important, but they may not always be met in the early days.

An alternative model of POA

When analysing the proposed application and admissions system a recurring theme of time pressure emerges strongly. There are many parts of the process in which more time would clearly be beneficial. For example: decision-making at the start of the process for applicants; post-results decision-making for applicants; between results and clearing for HEIs; for a proper appeals process to take place without affecting applications in the same year; and awarding bodies will likely also say that more time would be helpful for marking.

ATL proposes an amended model of post-qualification applications which adopts a January start for the majority of undergraduate degrees, and we urge UCAS to consider this more thoroughly. Together we would need to think more precisely about how other aspects of the application and admissions timetable would be adapted but such a move would almost certainly create appropriate time for all stakeholders to do what they needed.

Switching to POA is fairly obviously a major systemic change – it is sensible therefore to think about what other opportunities arise. If HE courses began in January, there would be space for a productive period of extended work experience post-exams (or post-summer). This was

becoming important to young people prior to the global economic crash, and can prove the difference now during a sustained period of high unemployment. Substantial work experience pre-HE is beneficial to all. Universities would on the whole get better, more focussed students; young people obviously benefit now and later in terms of the jobs market; schools benefit as it would reduce the existing strain on the post-16 curriculum and can aid destinations data. There is also wider economic benefit, which gives the idea an added political imperative. Fairness would need to be at the heart of implementation, not least in ensuring 'interns', if they were called such, were paid at the national minimum wage or above.

Academic years in HE running from January to December would be a bold change. But a slightly different adaptation could facilitate an ambitious new path for undergraduate degrees. There is an ongoing public debate about whether the standard length of an undergraduate degree needs to be three years or not. By keeping the regular academic year but running a short first year from January to summer (before students would pick up a 'full' second year in September), universities can reinvigorate undergraduate degrees and kickstart the debate on what university education looks like for students in the twenty-first century. Students, particularly those from less advantaged backgrounds, could benefit from a reduction in housing and living costs that would result and it would go some way to answering the concern over universities' international competitiveness.

Conclusion

Central to ATL's views on the principals of PQA, our comments on the proposal being consulted on, and our suggestions for how to improve the model are a commitment to doing what is fairest for all potential applicants.

We believe that in order for a system of post-qualification admissions to higher education to have the most positive effect it can, complexities and opportunities for gaining advantage by gaming the process must be minimised and the wider education, political and economic context taken account of. It is essential that young people in particular are provided enough support and that the provision of high quality, impartial information, advice and guidance is restored.

The new applications model being proposed operates at many points under tough time limitations. ATL's members support a switch to PQA and are prepared to make changes at their end of the bargain. We believe though that a similar commitment to compromise on timetables and term dates from HEIs could lead to the development of a very effective post-qualification applications system that widens participation in higher education, and serves many more individuals than its equivalent does currently.

ATL is more than happy to contribute further to UCAS' continued development of the proposal.