

## Response ID ANON-RF2V-G6FB-5

Submitted to **Post-Qualification Admissions Reform Consultation**  
Submitted on **2021-05-12 17:46:38**

### Introduction

### Proposal: A Post-Qualification Admissions System

### Not in Scope

### About You

#### 1 Please provide your name.

**Name:**

Johnny Rich

#### 2 Please provide your email address.

**Email:**

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#### 3 Are you responding as an individual, or as part of an organisation?

Other Organisation

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

**Organisation name:**

Engineering Professors' Council

**Organisation postcode:**

GU7 9FW

**Role:**

Chief Executive

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

Not Answered

#### 6 Are you happy to be contacted directly about your response?

Yes

#### 7 How did you hear about the consultation?

**Please explain:**

DfE website

#### 8 Would you like us to keep your responses confidential?

No

**Reason for confidentiality:**

### 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?

4

#### 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?

No

**Reason:**

The Engineering Professors' Council ([epc.ac.uk](http://epc.ac.uk)) represents the academic engineers in the UK. Our primary purpose is to provide an influential voice and authoritative conduit through which engineering departments' interests can be represented. To inform our response to this consultation we invited detailed feedback from our members – which cover engineering departments in 81 UK universities comprising over 7,000 academic staff, all branches of engineering, all UK administrations (and regions) and all provider types. We present the key themes and barriers highlighted by our members as they relate specifically to the delivery of HE engineering under post-qualification admissions. Our members expressed a broad range of views, highlighting the heterogeneity (and autonomy) among providers and we remind government that students are similarly not homogenous. In order to thrive and maximise their attainment and future prospects, it is essential each individual student is matched with the best environment for them. Our members report that they have created and adopted detailed admissions processes based on a deep understanding of applicants' needs and many years' experience to support the robust selection of students who are suited to their particular pedagogy and engineering course design. Practices vary greatly within engineering and indeed between engineering and other subjects to meet the fullest possible range of applicant need. At their heart, we do not feel that these proposals adequately grasp the complexities and strengths of current admissions practices. As a result, they do not collectively meet individual student needs, nor enable providers to respond to them well. The following barriers are further explained below:

a. Engineering is heavily dependent on overseas enrolments that, under PQA, would necessitate a two-tier admissions system. b. Pressured timescales compromise the HE sector's capacity to fill the gap created by a lack of engineering experience in schools and inadequate engineering information, advice and guidance for applicants. c. The proposals underestimate the importance of engineering departments' relationship with applicants and their input to their professional development. d. Non-exam-based and creative aspects of effective student recruitment and selection are exactly what applicants to engineering benefit from most, particularly those from non-traditional backgrounds. e. Engineering is a government subject of interest with a skills pipeline problem. Addressing this requires fewer barriers to engineering study, especially for those harder-to-reach students.

a. Engineering is heavily dependent on overseas enrolments that, under PQA, would necessitate a two-tier admissions system. i. Around one in every four undergraduate engineering students is international, even of those accepted through UCAS, meaning one in four engineering applicants (many more for some disciplines and providers) are out of scope of the PQA proposals. ii. To cater for the high volumes of international applications to engineering, there will need to be (at least) two admissions processes in pretty much every engineering department (see the EPC website for an institutional level appraisal), notwithstanding other existing direct undergraduate admissions practices. Even if UCAS opted to continue to process international applications through a non-PQA route centrally, universities would likely also opt to continue to accept international students directly also. We agree that international admissions timetables on an "equal footing" with UK timelines will undermine international demand, upon which engineering is heavily dependent not only in terms of the financial support of international fees, but also the great number and diversity of applicants and their much-needed contribution to the national engineering skills pipeline. However, earlier international admissions processes could lead to fewer places for UK students at the most selective providers. This would most adversely affect those from disadvantaged backgrounds who typically apply later. iii. Engineering departments will continue to administer postgraduate admissions processes. The distinction between undergraduate and postgraduate courses is more blurred in engineering than in any other subject (integrated masters) which compounds the engineering import dependency. Overall, nearly one in three HE enrolments in Engineering and technology are from outside of the UK; that's double the proportion across all science subjects and far greater than the one in five across all subjects). Should post-qualification approaches be adopted we foresee, at best, a "two-tier" admissions system in engineering to cater for international demand. This presents an impediment to UK students and is open to creative interpretation and abuse. Imagine a system where the most internationally desirable universities recruit outside of the reformed admissions system on an international fee basis, perhaps, at best, exporting the engineering HE asset or, at worst, selling early confirmation to those with the means to pay international fees. The need for two, three, four, or more tandem admissions systems in which providers operate, undermines the admissions reform per se, presenting a fundamental threat to a central undergraduate admissions system. b. Pressured timescales compromise the HE sector's capacity to fill the gap created by a lack of engineering experience in schools and inadequate engineering information, advice and guidance (IAG) for applicants. i. Subject choice in engineering needs support not available in the school system. Since most students do not have the opportunity to study engineering at school, there is an absence of common understanding of the subject at level 3. Consequently, applicants do not fully understand what engineering entails, nor are they able to clearly distinguish between distinct engineering disciplines. This already places the emphasis on IAG in relation to engineering study in higher education on the HE sector itself. Empirically, it is already hard for some HEIs to resource tailored support in engineering to close the gap from what is offered in schools. Under the reforms, there will be even less HE resource available to help with IAG during the crucial summer window. ii. Our members also report that poor IAG at earlier decision points in education leads many students to select subjects at level 3 (and level 2) that do not prepare them for STEM HE study. Colleagues have very successfully developed early admissions processes in engineering to rectify this failure, such as early and timely intervention to convert applicants on to engineering Foundation courses. This is an enabling practice in the interests of students, empirically more often those from lower socio-economic backgrounds. We note also that disadvantaged applicants are less likely to receive good IAG and would urge that creating a level IAG playing field at level 3 be the focus of change. iii. The PQA model would mean that applicants require advice and support for making applications over the summer. As already discussed, this is an essential service for engineering applicants, particularly those from traditionally under-represented groups in engineering. We have concerns that timely careers support may not be as readily available to applicants as it is under the current model due to admissions pressures on engineering academics. In summary, limited time and capacity could hinder, not help, our desire to encourage wider participation in engineering and related disciplines. Reform should seek to bring existing good HE IAG practices forward to support schools' engagement with engineering and close the gap between the IAG needed and that actually received, not to restrict the window in which this vital levelling-up occurs. c. The proposals underestimate the importance of engineering departments' relationship with applicants and their input to applicants' professional development. i. The nature of the relationship between student and institution will change under a post-qualification admissions system. Under the reforms, an applicant is simply a prospective student and does not become an offer holder (and so invested in the relationship) until much later in the cycle. This leaves less time to build the provider-applicant relationship resulting in more widespread hasty decision-making (already a well-documented weakness of the current Clearing process which accounts for only one in seven HE entrants rather than the whole cohort). This is important as engineering engagement with applicants is typically about what is right for the applicant. Therefore, less engagement means a less positive impact on helping students to make a well-considered choice. ii. Subject choice in engineering needs support beyond that available in the school system (see above) and is commonly between disciplines, not between engineering and other subjects. Our members have empirically fed back that applicants often change their minds on both engineering discipline and provider when they engage in discussions with staff and see a university. It seems likely that less time after application creates particular difficulties for undecided students. It is possible that some engineering departments would try to mitigate this already by offering a general engineering degree for the first year or more of a course before specialising. Even if this proves an effective mitigation, in the meantime, there would be disruption and, most like, higher drop-out rates. iii. Reduced applicant engagement coupled with an emphasis on the 'market' and the trading on grades would reduce the visibility of different styles of teaching, engineering courses and types of labs etc. It is difficult to see how a genuine PQA model would work in a consultative and neutral way in pursuit of the best interests of the applicant, when the system suggests students must barter only on grades. In summary, we are concerned about students leaving discussions with providers and others regarding future career decisions to later in the academic year. Delaying the application timeline gives us more opportunity before the specialisation choice is made only if we can constructively engage with applicants long before this; support structures can be resourced by all providers when needed in the summer; school engagement and support processes continue to be available and prioritised alongside exams (there is a risk this will slip with a later deadline); and school emphasis isn't only on grades. d. Non-exam-based and creative aspects of effective student recruitment and selection are exactly what applicants to engineering benefit from most, especially those from non-traditional

backgrounds. i. Since most students do not have the opportunity to study engineering at school, qualifications can only ever be proxies for 'potential to succeed in engineering'; paper qualifications in Maths and other subjects (not only sciences) are only part of the applicants' full stories. ii. In engineering, we're already driven by economic demand for engineers to deal successfully with large numbers of applications from those with less traditional qualifications, which the sector currently looks at individually, assessed on their own merits. Under PQA reform, the compressed timeframe resulting from moving the application or offer process to later in the cycle would limit the widescale use of admissions tools (beyond A level performance) to assess suitability and engineering aptitude. This presents a barrier for many widening participation activities targeted at these cohorts – including open days, summer schools, maths and other entrance assessments and summer remedial sessions – limiting opportunities for these students to receive adequate consideration of their potential. The EPC resists a move to a binary approach to admissions based on matching applicants to places founded on exam achievement alone which does not reflect the breadth of practices across the sector in the interests of the very students these reforms purport to support. Previous performance/qualifications can be one indicator and should be only one part of the application and admission process. e. Engineering is a government subject of interest with a skills pipeline problem. Addressing this requires fewer barriers to engineering study, especially for those harder-to-reach students. i. Engineers are essential players in the UK's recovery. Sustainable admissions processes in engineering must be a government priority in order to support demand for STEM HE study amidst a well-documented national shortage of engineers. ii. PQA may reduce the number of applicants applying to do "harder" subjects. Already, in some areas, demand is maintained through change-course offers to less popular (but high-performing) engineering courses. We warn that PQA would exacerbate, not address, the pipeline problem through the creation of additional barriers to those less well represented in engineering and those coming to HE through non-traditional engineering pathways. The engineering HE sector needs to continue to build its capacity to recruit creatively and holistically, requiring a careful approach not algorithmically limited.

## **PQA Delivery and Implementation**

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

**Please explain:**

### **Illustrative models for a PQA system**

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

**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.**

Worse than current system

**Please explain:**

Overall, the EPC is not persuaded that option 1, as outlined in the consultation, would be better than the current system and is likely to be worse. While some of our members recognised potential efficiency gains, we have identified a range of costs and adverse effects of implementation of such a reform, which pose a threat to the already severely disabled supply of engineering skills to support the UK economy and its recovery. At the heart of our concern is the risk to robust applicant and institutional decision-making and the risk of a binary approach that does not support the best possible match between a student and the right course / provider for them:

- Much less time than currently for students to apply to higher education.
- Less opportunity for applicants to gather information, advice and guidance on potential university options. Pressured timescales compromise the HE sector's capacity to fill the gap created by a lack of engineering experience in schools and inadequate engineering information, advice and guidance for applicants.
- A limited period of less than two months to process volumes of applications which currently take much longer.
- Inadequate time for crucial admissions tests, suitability assessments and interviews.
- Elimination of the more practical and creative aspects of effective student recruitment and selection which most benefit engineers. Non-exam-based and creative aspects of effective student recruitment and selection are exactly what applicants to engineering benefit from most, particularly those from non-traditional backgrounds.
- Reduced applicant engagement.
- Restricted ability for students to be matched with the HEI that would suit them the best. The proposals underestimate the importance of engineering departments' relationship with applicants and their input to applicants' professional development.
- Compromised staff time and capacity on other student-centred / student-facing activities when supporting recruitment in July and August.
- Less time for students to prepare for the course. Engineering is teaching intensive with less "free time" once the course has started.
- Pressures on term-one course delivery.
- Lack of demand data causing financial, timetabling and resource planning and sustainability issues which impact directly on students. The nature of engineering programmes means they are, generally, physical-resource heavy when compared to many other disciplines.
- Too many engineering students outside of the scope of the system. Engineering is heavily dependent on overseas enrolments and this would necessitate a two-tier admissions system.
- Risk of creating a very binary approach where grade boundaries become inflexible cliff-edges.

Our members recognise the perceived / potential benefits of university and applicant certainty and confidence in actual grades in algorithmic decision-making based on pre-requisite subjects and grades at A level, but in many engineering departments, paper qualifications are only one part of the application/admission process.

A briefer, inevitably more algorithmic, approach to admissions was widely challenged by our membership, who cited information on and an aptitude for engineering as key factors, particularly for widening participation students.

Our informal risk-benefit analyses highlight many risks in this approach with little evidence of known benefits to students. On balance, the EPC is not persuaded

that option 1 would be better than the current system nor a more equitable model and is deeply concerned that it would be worse.

**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?**

**Please explain:**

At face value, this could allow for students to focus on school without the added stress of university applications at the same time. However, the following impacts may be more harmful than the problems that the model is attempting to solve, and which do not seem to be creating significant barriers to admission at the moment.

a. Much less time than currently for students to apply to higher education

Student applications starting at the end of July will provide much less time than currently for students to apply to higher education and the in-school year window of opportunity could be lost.

This time is an opportunity for applicants to gather information on potential university options, which is crucial in engineering as it is not available at GCSE and A level.

Applicants do not fully understand what the subject entails or have access to the subject advice support not available in the school system.

Within this model, there will be less HE resource available to help with IAG during the crucial summer window. Empirically, it is already hard for some HEIs to resource tailored support in engineering to close the gap from what is offered in schools.

Schools might well struggle to maintain student attendance after exams, particularly among those for whom higher education is not their default chosen pathway. In FE colleges, where students' voluntary attendance, particularly for co-curricular activities, is the norm, it would be almost impossible to provide students with the same level of support and guidance as currently.

Seventy percent of our respondent members thought that IAG would be worse under this model. All respondents thought tailored or general support to applicants would be worse.

b. Reduced applicant engagement

The nature of the relationship between student and institution will change under a post-qualification admissions system. An applicant is simply a prospective student and does not become an offer holder (and so invested in the relationship) until much later in the cycle and there will be less time to build this.

This is important as engineering departments' engagement with applicants is typically about establishing what is right for the applicant. Therefore, less engagement means a less positive impact on helping students to make a well-considered choice. It is good practice for admissions tutors to guide applicants to the right institution and the right course for them, not merely to generate 'bums on seats' as is the implicit assumption of the consultation. (It just does not make sense for a provider to want to attract someone for whom the course is not right leading to non-completion anyway).

Subject choice in engineering needs support not available in the school system and applicants often waver between different engineering disciplines, not between engineering and other subjects. Our members have empirically fed back that applicants often change their minds on both engineering discipline and on provider when they engage in discussions with staff and see a university (including its labs, resources and extra-curricular engineering activities/projects available). It seems likely that less time after application creates difficulties for undecided students. Some engineering departments mitigate this already by offering a general engineering degree for the first year or more of a course before specialising.

We are concerned about students leaving discussions regarding future career decisions to later in the academic year. Delaying the decision about which institutions feature on applications forms gives us more opportunity before the specialisation choice is made only if we can constructively engage with applicants long before this, support structures can be resourced by all providers when needed in the summer, school engagement and support processes continue to be available and prioritised alongside exams (there is a risk this will slip with a later deadline) and school emphasis isn't only on grades. Given these dependencies, these benefits are unlikely to be realised.

All respondents to our consultation survey reported that developing relationships with applicants and applicant engagement would be worse under PQA model 1 and two-thirds of respondents felt that professional discussion about career choices would be adversely affected.

c. A limited period of less than two months to process volumes of applications which currently take much longer.

The timeframe for applicant decisions is short. This would restrict the available time window for essential non-exam-based entrance processes (interviews, competence tests, etc).

Where admissions are managed centrally, staff FTE would need to be reconsidered. Marginal gains in efficiency may mean savings but universities would need potential restructuring to make sure sufficient staff were available during the summer months to support concentrated admissions (i.e., more admissions staff during the July-October window and fewer outside of this). There will be recruitment, retention and training issues and costs associated with higher temporary staffing.

EPC research suggests that in engineering admissions responsibilities are most commonly at least partly devolved. In these departments, pushing this vital activity into the summer months will cause huge resourcing issues affecting the academic timetabling and, subsequently, the nuts and bolts of HE delivery:

- Engineering has more contact, teaching and learning time than most subjects. The academic year and its associated assessments do not complete until the start of July, and there is a risk of operational overlap between the intrinsic HE offer for existing students and time-compressed and intensive admissions of the next cohort. Further to this, some institutions are already operating extended academic years in response to the needs of employers, for Degree or Higher Degree Apprenticeships for example. This results in teaching extending into July and beginning in early September, leaving a limited window for other activities.
- Examining duties will be compromised. In engineering, there may be a larger number of assessments bunched together in January, because of the later start. Students could find the bunching of assessments difficult to manage, and the progression rate for first-year engineering students would likely decrease. Stretching the entire first year to start late and finish might not be possible at institution level for only one subject and it would exacerbate the above problem anyway. Already some universities will not allow changes to exam and assessment dates, imposing a one-size-fits-all strategy to the detriment of engineering students.
- Staff associated with recruitment would be unable to fit in research activities / conferences which are essential for innovative engineering course design and the subject's academic sustainability; engineering is a fast-paced discipline based on rapidly evolving technologies and practices in which research systematically and essentially informs future curriculum content and curriculum redevelopments. A larger than average proportion of staff in engineering departments engage in research; engineering research conducted by academics over the Summer is often of national and/or regional economic importance and the broader repercussions of compromising this activity are far wider than the problems of admissions.
- Staff dealing with undergraduate admissions would have to be removed from supervising MSc projects in engineering. Who will do this?
- Staff wellbeing could be detrimentally impacted. Annual leave would be further restricted so to share load across the team. When are academics to take holiday? This will also impact on families' ability to have holidays in school holidays as required by other parts of the education sector and which will make them unaffordable for many. Concentrating recruitment activities prior to semester, instead spreading load over year could increase staff burn-out.

d. Less time for students to prepare for the course.

Encouraging applications from applicants with non-traditional qualifications to engineering is a crucial part of many providers' Access and Participation plans. As discussed, this comes with the need to bridge the gap post-acceptance. Over 70% of our survey respondents thought that pre-entry or Summer or remedial activities would be worse under PQA.

For Summer remedial activities which relate to existing academic cohorts (including academic resit exam periods), these would need to move to earlier in the academic cycle to prevent overlap with the admissions cycle, as at school level these can involve many of the same administrative staff.

Engineering is also teaching intensive with less "free time" once the course has started.

e. The planned start date for programmes would need to be changed

This model places more pressure on an already intensive first term in engineering. Currently, our members' undergraduate engineering programmes start as early as the first week in September, and even earlier for institutions offering 'Transition to University' support programmes. (This depends on a range of factors, including the type of degree, the level of work experience, the scale of international intake and the providers' approach to induction.) The loss of even one teaching week in first term for the latest starters is problematic for engineering programmes, which are more intensive than most other subjects. This would affect learning outcomes, which are subject to scrutiny by accreditation, which is critical to students' professional progression.

f. Lack of demand data causing financial, timetabling and resource planning and sustainability issues which impact directly on students

Students not applying to HE until their level 3 results are known will result in less visibility of changes in student application trends ahead of the start of the new academic year and a lack of firm data on likely intake until that time. This would mean HE planning would occur much later in the academic year than currently, resulting in financial uncertainty at course and department level and in terms of course resource and staffing procurement, particularly for engineering due to the practical and physical nature of our programmes.

Similarly, there will be issues with timetabling – particularly for course-specific engineering resources (including labs) which are intensive and essential – and staff, including expert industry-based visiting professors in engineering.

It may become increasingly difficult to be responsive to significant shifts in student demand at a late point in the current cycle meaning deferment to the next. In the years following a global pandemic, historical data and trends are likely to be less instructive.

The rush would be compounded if numbers of applications were unexpectedly lower one year (small number differences in specialist courses being particularly problematic). Providers are left with little time to respond to changes in behaviour/preference in courses and some (smaller providers) cannot flex quickly enough if they get information only in late Aug/Sept.

Four-fifths of respondents to our members survey thought HE resources planning would be worse under model 1.

Our members from UK administrations where student numbers are currently managed / capped by government have expressed serious concerns about the management of their intake by group.

**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?**

**Please explain. 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.:**

Some form of pre-application process would be essential to allow prospective students to gain an understanding of the profession. Subject choice in engineering needs IAG support not available in the school system as engineering is not widely available at GCSE and A level, so applicants do not fully understand what the subject entails. Less time for visits would inevitably lead to less specific information being provided to students. Post-qualification approaches would destroy opportunities for targeted IAG and outreach which would disadvantage engineering and abrogate the considerable efforts being made to increase the skills

pipeline – in particular widening participation activity.

It would be counterproductive to arrange visits around a tightly prescribed availability calendar at the expense of the purpose of the visit. Three-quarters of our survey respondents thought visiting opportunities would be adversely curtailed under PQA.

While some felt there might be more applicant capacity for visits between exams and results, most felt that this did not leave enough time for post application visits, suggesting strongly that visits would still need to be made earlier, with more pre-application time for visits. A pre-application timeframe for relationship-building could potentially provide additional opportunities for engagement with underrepresented groups and promote uptake, however this potential would be difficult to realise, especially with those target groups.

The nature of the relationship between student and institution would change under a post-qualification admissions system. An applicant is reduced to a prospective student and does not become an offer holder (and so invested in the relationship) until much later in the cycle. New ways to engage with students will need to be conceived, developed, resourced and implemented to ensure applicants can access the right engineering discipline and university for them. Many of our members anticipate some further types of 'engagement' activities – e.g., more specialised than open days, but less formal than interview days.

As engineering is not available at GCSE and A level, allowing applicants to take part in practical activities, see the facilities and really get a sense of the variety and interest of engineering as a discipline is also crucial. The importance of applicants identifying where they "feel at home" (especially some groups of students including those with no family background of university, LBGQT minority ethnic, disabled and care-experienced students who may need extra time to identify a university where they feel comfortable to be themselves and seek inclusive university support).

With this model, a visit and information cycle would need to take place between October and July in order for applicants to make an informed decision. Without this we run the risk of students making a bad choice of course for them. Given that applicant recruitment and conversion activities (visits, guidance, etc) events would need to be front-loaded as much as possible, there may be duplication of efforts as some information activities and events would need move or be additionally provided later in the academic year to ensure relevant information and support was available to applicants at the point of application. If visiting post-qualification, this coincides with the busiest months of the year in terms of tourism and hence travel and accommodation prices will be higher, especially given the lack of opportunity to plan in advance, and this would be a barrier for some.

Departments may make 'informal' assessments of applicants attending such days, so that it might be possible to reach out to known potential applicants who have not quite met the standard entry requirements to encourage an application (especially if they showed good aptitude for engineering at application/interview). This presents less transparency than the current system.

Universities would need to be transparent about and publicise what grades were necessary for applications to be considered well before the point of application, and applicants would still need to know what they might achieve at level 3 in order to make realistic or aspirational enquiries. For those institutions where offers are typically 'guaranteed' if the published grade thresholds are met, there may need to be a shift towards 'consideration of application' not 'guarantee of place' if minimum grades are obtained if the PQA model is adopted.

In engineering, space in the calendar will need to be found for pre-entry or summer or remedial activities in order to maintain the levels of engineering undergraduates and maintain the supply of skilled individuals into engineering industries. There is a well-documented skills shortage in engineering which universities work collaboratively to address.

#### **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?**

##### **Please explain:**

All students who wish to study engineering are at a disadvantage under the proposed PQA model, since most students don't have the opportunity to study engineering at school. For these students, qualifications can only ever be proxies for 'potential to succeed in engineering'; previous performance/qualifications in Maths and other subjects (not only sciences) can be one indicator, but they are never the full story.

While this model avoids the unfair practice of conditional unconditional offers, pre-results, our membership is clear that all applicants and especially those from disadvantaged groups, students with disabilities, mental health issues or other special needs require a considered and holistic approach, otherwise their potential talent could be lost. These are precisely the students who will be most harmed by the PQA approach to university entry as modelled.

In engineering we deal with a large number of applications from applicants with less-traditional qualifications and it is demonstrable that an engineering degree is a highly effective pathway to their social mobility. (The EPC will shortly be publishing research on this which will be available at [epc.ac.uk](http://epc.ac.uk) later this month.) Applicants holding these qualifications are commonly looked at individually and assessed on their own merits, which all takes time. Further investigation of applications can also be required, i.e., fee queries, additional information required, etc. Under PQA reform, compressed time of moving the application or offer process to later in the cycle would limit the opportunity for many activities for disadvantaged groups, including widescale use of admissions tools beyond A level performance to assess suitability, engineering aptitude and Summer schools.

In particular, many engineering departments currently have maths tests to account for the fact that many BTEC applicants do not have A-level Mathematics. PQA would compress the timings for these tests and potentially mean that students have very little time to prepare for them.

The EPC is aware that a number of engineering departments have a system of alternate offers, such as to foundation courses or less established courses, which meet important applicant needs identified through early engagement with potential applicants and offer holders (such as the need to mitigate for ill-advised A level course choice, results not matching presented potential, etc.) Engineering departments do a great deal to support students with suboptimal subjects and lower UCAS points to engineering. This is crucial for the engineering skills pipeline.

We are unclear how contextual offers – commonly deployed in engineering – might work in this model. While the model could improve aspirations for

disadvantaged applicants whose grades might be underpredicted who may not otherwise have applied to particular institutions without prior knowledge of grades, it could conversely affect those from widening participation backgrounds who might be put off by the stated entry requirements post-qualifications; widening participation students may not be aware that they are eligible for a minimum offer (and eligibility will vary dependent on engineering course and provider).

In either case, in order to take advantage of the reforms, these students would need a significant amount of advice and support from schools over the Summer so may still be disadvantaged – independent schools will have more resource to do this. If equitable support were not in place, then any advantage to these students would be undermined.

We have already discussed how engagement with students coming from non-standard backgrounds becomes more difficult under this model. From the applicant's perspective, there is less for them to feel that they can make an informed choice about how the university or department can respond to their needs.

Finally, there are clear widening participation implications for universities in the UK administrations where intake is capped for various groups by the government and attainment of target is measured through intake ratios between the target groups.

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

### **Please explain:**

In engineering, there is widespread use of admissions tools beyond A level performance to assess suitability, engineering aptitude and potential. Interviews are an important part of many engineering admissions process, since level 3 qualifications can only ever be proxies for 'potential to succeed in engineering', as many applicants do not have the opportunity to study engineering at school and they do not fully understand what the subject entails. Previous performance/qualifications in Maths and other subjects (not only sciences) can be one indicator, but they are never the full story.

In addition, engineering academics and admissions tutors already successfully deal with a large number of applications from applicants with less-traditional qualifications; these are looked at individually and assessed on their own merits, which all takes time. Under PQA reform, compressed time of moving the application or offer process to later in the cycle. This would restrict the available time window for other entrance processes (interviews, competence tests, etc) for many widening participation activities and in high demand courses.

Two-thirds of respondent members in our members consultation reported that the impact on entry tests, assessments and interviews would be worse than the current system under PQA (unless they could still be conducted before results) due to the impracticalities of holding these during the tight PQA window. In order to ensure applicants are able to access the courses and institutions which are right for them, non-exam-based measures will need to be retained. This could include assessment centres (including online) to give earlier indications of performance and the concept, devising, testing and introduction of additional selection tools (instead of interview).

Among members already taking an algorithmic approach to admissions, interviews were considered a conversion tool, so efficiencies would be made by removing the need for interviews. But even in this scenario, the increased reliance on exams created by the inability to conduct the practical elements of a more innovative admissions processes were recognised.

## **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

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

In engineering, international students make up approximately 25% of undergraduate students (even through UCAS), so, on the assumption that international applicants remain out of scope so as not to disadvantage them or threaten UKHE's competitiveness, then almost all engineering departments would be operating a two-tier admissions system at undergraduate level (see earlier comments).

Degree Apprenticeship student admissions would also need to go through as system closer to the current system as they are being employed/appointed within an organisation and this is tied/linked to their enrolment on an engineering BEng / BSc programme (in many cases).

The necessary existence of tandem undergraduate admissions systems undermines the admissions reform per se. Some of our members have expressed concern that if a PQA 'matching' service was the centralised admissions offer, pursuing a route of Direct Applications only could be an option as they would not want to move to a more impersonal 'sausage factory' style of student recruitment and selection.

Indeed, other mitigations to the inadequacy of this model for non-traditional or widening participation students, which would be needed to support robust and equitable admissions to engineering, are tantamount to alternative application systems.

Any two (or more) tiered system would also be open to creative interpretation and abuse. For example, could universities recruit outside of the reformed admissions system on an international fee basis to those UK students with the means to pay international fees? Or would the most internationally desirable engineering departments fill their places with overseas demand, both depriving UK students of the top-sliced offer and, ultimately, given that international students are less likely to stay in the UK after study, exporting the engineering HE talent so desperately needed to address the well documented engineering skills gap in the UK.

In any event, there would need to be solutions for already-qualified applicants to be able to apply and be placed throughout the cycle, rather than wait for the prescribed 'window' but again we must warn of the competitive gaming in interpretation of eligibility which is likely to emerge.

The reduced applicant engagement coupled with an emphasis on the 'market' and the trading on grades would reduce the visibility of different styles of teaching, engineering courses and types of labs etc. It is difficult to see how a genuine PQA model would work in a consultative and neutral way in pursuit of the best

interests of the applicant, when the system suggests students must barter only on grades.

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

Yes

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

Without limits, there is a risk of the process degenerating into a first-come, first-served system, with the unfairness that would clearly bring. If places are filled serially, based on first-come, first-served, this benefits the better-organised applicant (and it should be remembered, the organisation may not be their own). We are fundamentally concerned that these less well supported applicants may also struggle in getting their applications together in a short time window, especially if the timing of this window resulted in less robust support and guidance.

Number-planning by HE providers would also remain a big problem in guessing how many offers to issue if candidates may hold several offers. This could be improved if only 2-3 offers were allowed per applicant (similar to Firm and Insurance offers now).

Additionally, part of the uncertainty in the planning processes could be mitigated by 'sector agreed' cut-off dates for final applicant offer acceptances to safeguard against long application processing impacting on admissions in other institutions.

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

### **Please explain:**

Do you mean how quickly the model could be implemented or how quickly applications could be processed under the model?

If the former, our members have told us that they would have to rewrite (and re validate) their admissions and selection process.

If the latter, please see our response to questions 2 (and 3) above, which focus on the issue of timing in this model.

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

### **Please explain:**

The EPC's risk-benefit analyses highlight much risk in this approach with little evidence of known benefit to students.

A fundamental flaw with this model is that emphasis on the known exam grades comes at the direct cost of all other elements of admissions already widely used to accurately predict the success of an applicant-course-provider match. In targeting pockets of unethical practice, the proposals fundamentally underestimate the complexities and good practice in admissions currently to support all applicants and perpetuate the current unsatisfactory Clearing practice.

We urge government to consider why all of the component admissions practices processes occur within the range of admissions portfolios, focusing on the purpose they serve. Our membership is clear that disadvantaged groups and others underrepresented in HE need more considered and holistic approach, otherwise their potential talent could be lost. These are precisely the students who will be most harmed by a PQO approach to university entry as modelled.

The proposals do not address the underlying social injustice; poor and unequitable access to knowledge, information and advice on HE and career choice in the pre-HE school system, particularly in engineering. The model does not take adequate account of non A level qualifications nor the devolved administrations' needs.

It is our experience that the juxtaposition of PQA and PQO proposals is leading, tending to the comparison of PQA with the current system and PQO to the PQA system. As such, while this model was generally considered less disruptive than PQA by our members, the majority of benefits identified and valued (distributed workload, informed selection of courses, clarity of applicants for planning purposes, longer recruiting season, opportunity for longer-term relationships with applicants) were those represented in current application system.

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

### **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.**

Worse than the current system

### **Please explain:**

Overall, the EPC is not persuaded that option 2 as outlined in the consultation would be better than the current system and is likely to be worse. At the heart of our concern is the risk to robust applicant and institutional decision-making and the risk of a binary approach that does not support the best possible match between a student and the right course / provider for them:

- Increased "Clearing" scramble leading to pressured (and evidentially poor) decision-making.
- A limited period for the making and accepting of offers leading to pressured student consideration of offers.
- Inadequate time for crucial admissions tests, suitability assessments and interviews.



- Elimination of the more practical and creative aspects of effective student recruitment and selection which most benefit engineers.
- Reduced applicant engagement with their chosen university(ies). The proposals underestimate the importance of engineering departments' relationship with applicants and their input to applicants' professional development.
- Less time for students to commit to / prepare for their course.
- Inadequate IAG and increased dependence on the HE sector's capacity to fill the gap created by a lack of engineering experience in schools and inadequate engineering information, advice and guidance for applicants, post-results.
- Compromised staff time and capacity on other student-centred / student-facing activities when supporting offer conversion in July and August.
- Pressures on term one course delivery.
- Lack of demand data causing financial, timetabling and resource planning and sustainability issues which impact directly on students.
- Too many engineering students outside of the scope of the system. Engineering is heavily dependent on overseas enrolments and this would necessitate a two-tier admissions system.

At face value, known results would appear to remove the inaccuracy of predicted exam grades from the process, but in doing so, would also remove much of the accuracy around non-examination assessments and targeted admissions practices already in place to do this and much more. In many engineering departments, admissions paper qualifications are only one part of the application / admission process. A briefer, algorithmic, approach to admissions was widely challenged by our membership, who cited information on and an aptitude for engineering as key factors, particularly for widening participation students.

Our informal risk-benefit analyses highlight much risk in this approach with little evidence of known benefit to students. On balance, the EPC is not persuaded that option 2 would be better than the current system nor a more equitable model. We believe the following impacts may be more harmful than the problems the model is attempting to solve:

a. Pressured student consideration of offers

The timeframe for applicant decisions is short. Student offer-making post-results will create a limited and pressured window for students to reply to their offers. There is clear evidence that decision-making in the current post-qualification offer-making Clearing environment is poor, resulting in increased non-continuation on matches secured in this way.

The in-school year window of opportunity could be lost leaving insufficient time for applicants to seek support during the school year. Within this model, there will be limited school-based IAG and less HE resource available to help with IAG during the crucial summer window. Empirically, it is already hard for some HEIs to resource tailored support in engineering to close the gap from what is offered in schools.

b. Increased "Clearing" scramble

If applicant acceptances and rejections of offers are pushed into post-qualification, rather than a small proportion of applicants, instead all applicants are effectively being placed in Clearing, for which there is clear evidence that it is not in the interests of the student. Decision-making in the current post-qualification offer-making Clearing environment is poor, resulting in increased non-continuation on matches secured in this way.

This will also impact on the window for post-award admission 'Clearing Clearing' processes. Unless every applicant is successful in securing an offer that they want to accept, there will need to be more than one round.

This will have a particular impact on UK administrations for areas where strict student number caps are in place for some qualifications (for instance, the MaSN in Northern Ireland).

c. A limited period for the making and accepting of offers

This model would restrict the available time window for essential non-exam-based entrance processes (interviews, suitability / competence tests, etc), eliminating the more practical and creative aspects of effective student recruitment and selection which most benefit engineers. Such practical tests, competence exercises and interviews are used by some institutions to support decision making and to guide applicants towards specific engineering discipline choices which are aligned to their individual interests, goals and aptitudes. Non-exam-based and creative aspects of effective student recruitment and selection are exactly what applicants to engineering benefit from most, particularly those from non-traditional backgrounds. Interview days form a very important part of many of our members' applications and admissions processes but are not viable until an application has been received, at which point there will not be enough time to act. Waiting for exam results means providers may not have all of the non-qualification information they need for decision-making nor the timeframe to acquire it.

Where admissions are managed centrally, staff FTE would need to be reconsidered. On the release of UCAS results/data, the impact on small HEIs (or engineering departments) could be particularly damaging as they don't have the capacity to 'ramp up' in the way that those with big teams can and are also more harmed by small absolute shortfalls in numbers.

EPC research suggests that in engineering admissions responsibilities are most commonly at least partly devolved. In these departments, pushing vital offer-making activity into the summer months will cause resourcing issues affecting the academic timetabling and, consequently, the nuts and bolts of HE delivery:

- Engineering has more contact, teaching and learning time than most subjects. The academic year and its associated assessments do not complete until the start of July, and there is a risk of operational overlap between the intrinsic HE offer for existing students and time-compressed and intensive admissions of the next cohort.
- Examining duties will be compromised. In engineering, there may be a larger number of assessments bunched together in January, because of the later start. Students could find the bunching of assessments difficult to manage and the progression rate for first-year engineering students would likely decrease. Stretching the entire first year to start late and finish might not be possible at institution level for only one subject and it would exacerbate the above problem anyway. Already some universities will not allow changes to exam and assessment dates, imposing a one-size-fits-all strategy to the detriment of engineering students.
- Staff associated with recruitment would be unable to fit in vital research activities / conferences which are essential for innovative engineering course design and the subject's academic sustainability; engineering is a fast-paced discipline based on rapidly evolving technologies and practices in which research systematically

and essentially informs future curriculum content and curriculum redevelopments. A larger than average proportion of staff in engineering departments engage in research; engineering research conducted by academics over the Summer is often of national and/or regional economic importance and the broader repercussions of compromising this activity are far wider than the problems of admissions.

- Staff dealing with undergraduate admissions would have to be removed from supervising MSc projects in engineering. Who will do this?
- Staff wellbeing could be detrimentally impacted. Annual leave would be further restricted so to share load across the team. Further to this, some institutions are already operating extended academic years in response to the needs of employers, for Degree or Higher Degree Apprenticeships for example. This results in teaching extending into July and beginning in early September, leaving a limited window for leave. When are academics to take holiday? This will also impact on families' ability to have holidays in school holidays as required by other parts of the education sector and which will make them unaffordable for many. Concentrating recruitment activities prior to semester, instead spreading load over year could potentially increase staff burn out.

d. Reduced applicant engagement with their chosen university(ies)

Engineering engagement with applicants is typically about establishing what is right for the applicant. Therefore, less engagement means a less positive impact on helping students to make a well-considered choice. Course choice in engineering needs support not available in the school system and is commonly between disciplines, not between engineering and other subjects. Our members have empirically fed back that applicants often change their minds on both engineering discipline and provider when they engage in discussions with staff and see a university.

However, under a post-qualification offer system, the nature of the relationship between student and institution will change. With information held centrally until results are known, an applicant is simply a prospective applicant as far as the university is aware and does not become an offer holder (and so invested in the relationship) until much later in the cycle. There will be less time to build applicant engagement and course commitment as the opportunity to do this will be spent 'on file' waiting for examination results. This would be a staggering lost opportunity.

Making offers once we have all of the information may remove the risk of disadvantage or lack of aspiration only if we can constructively engage with applicants long before this, support structures can be resourced by all providers when needed in the summer, and school engagement and support processes continue to be available into the summer. Given these dependencies, these benefits are unlikely to be realised.

No respondents to our consultation survey reported that developing relationships with applicants and applicant engagement would be improved by model 2, which would potentially increase administrative overhead of maintaining the relationship with the applicant from pre-application through to the point of an offer being issued post-qualification, where this is not the current practice.

e. Less time for students to prepare for the course.

Encouraging applications from applicants with non-traditional quals to engineering is a crucial part of many providers' Access and Participation plans. As discussed, this comes with the need to bridge the gap post-acceptance. For summer remedial activities which relate to existing academic cohorts (including academic resit exam periods), these would need to move to earlier in the academic cycle to prevent overlap with the admissions cycle, as at school level these can involve many of the same administrative staff.

Engineering is also teaching intensive with less 'free time' once the course has started.

f. The planned start date for programmes might need to be changed

This model places more pressure on an already intensive first term in engineering. Currently, our members' undergraduate engineering programmes start as early as the first week in September. (This depends on a range of factors, including the type of degree, the level of work experience, the scale of international intake and the providers' approach to induction.) The loss of even one teaching week in first term for the latest starters is problematic for engineering programmes, which are more intensive than most other subjects.

g. Lack of demand data causing financial, timetabling and resource planning and sustainability issues which impact directly on students

Students' applications being held centrally until their level 3 results are known will result in less visibility of changes in student application trends ahead of the start of the new academic year and a lack of firm data on likely intake until that time. The number of applications an applicant can make will be a factor in transparency of demand to providers, as well as whether anonymised, headline data (on numbers of applications / likely grades etc) were known.

This could mean HE planning would occur much later in the academic year than currently resulting in financial uncertainty at course and department level and, particularly for engineering, in terms of course resource and staffing procurement. The nature of engineering programmes means they are, generally, physical-resource heavy when compared to many other disciplines. The nature of engineering programmes means they are, generally, physical-resource heavy when compared to many other disciplines. Similarly, there will be issues with timetabling – particularly for course-specific engineering resources (including labs) which are intensive and essential – and staff, including expert industry-based visiting professors in engineering.

It may become increasingly difficult to be responsive to significant shifts in student demand at a late point in the current cycle meaning deferment to the next. In the years following a global pandemic, historical data and trends are likely to be less instructive. The rush would be compounded if numbers of applications were unexpectedly lower one year (small number differences in specialist courses being particularly problematic). Providers are left with little time to respond to changes in behaviour/preference in courses and some (smaller providers) cannot flex quickly enough if they only get information in late August / September.

Our members from UK administrations where student numbers are currently managed / capped by government have expressed serious concerns about the management of their intake by group.

Our members recognise the perceived / potential benefits of university and applicant certainty and confidence in actual grades in algorithmic decision-making based on pre-requisite subjects and grades at A level, but in many engineering departments, paper qualifications are only one part of the application/admission process.

A briefer, algorithmic, approach to admissions was widely challenged by our membership, who cited information on and an aptitude for engineering as key factors, particularly for widening participation students.

Our informal risk-benefit analyses highlight many risks in this approach with little evidence of known benefits to students. On balance, the EPC is not persuaded that option 2 would be better than the current system nor a more equitable model and is likely to be worse.

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

### **Please explain:**

Within this model, there will be less HE resource available to help with IAG during the crucial Summer window. Empirically, it is already hard for some HEIs to resource tailored support in engineering to close the gap from what is offered in schools. Subject choice in engineering needs IAG support not available in the school system as engineering is not available at GCSE and A level, so applicants do not fully understand what the subject entails. Less time for visits would inevitably lead to less specific information being provided to students. General IAG may need to be provided between October and July which would disadvantage engineering and damage the pipeline.

While some EPC members felt there could be benefits moving open days to after students finish A-levels to enable more visits, most were concerned that this approach, coupled with the withholding of application details from the provider, did not leave enough time for post-result campus activities, such as essential non-exam-based entrance processes (interviews, suitability / competence tests, etc). Interview days, for example, form a very important part of many of our members' applications and admissions processes but are not viable until an application has been received, at which point there will not be enough time to act. Engineering departments have indicated they may need to mitigate this through running some sort of 'engagement' days, where informal assessment of potential applicants could take place, so that this information (currently gleaned from interviews or other activities) can be factored into the decision-making process about whom to give offers to after results day. But in this scenario the sector will spend diffuse resources and time inefficiently 'assessing' potential applicants, without knowing if they will make an application.

The nature of the relationship between student and institution will change under a post-qualification offers system. An applicant does not become an offer holder (and so invested in the relationship and course) until much later in the cycle. With this model, a visit and information cycle would need to take place between October and July in order for applicants to make an informed decision. Without this, we run the risk of students choosing a sub-optimal course for them. Given that applicant recruitment and conversion activities (visits, guidance, etc) events would need to be front-loaded as much as possible, there may be duplication of efforts as some information activities and events would need to move or additional events provided later in the academic year to ensure relevant information and support is available to applicants at the point of offer / reply. If visiting post-qualification, this coincides with the busiest months of the year in terms of tourism and hence travel and accommodation prices will be higher, especially given that bookings could not be made far in advance, which would be a barrier for some.

Departments may make 'informal' assessments of applicants attending such days, so that it might be possible to reach out to known potential applicants who have not quite met the standard entry requirements to encourage an application (especially if they showed good aptitude for engineering at application/interview). This presents less transparency than the current system and again, diffuse use of resource.

In engineering, space in the calendar will need to be found for pre-entry or Summer or remedial activities in order to maintain the levels of engineering undergraduates and maintain the supply of skilled individuals into engineering industries. There is a well-documented skills shortage in engineering which universities work collaboratively to address.

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

### **Please explain:**

In engineering, qualifications can only ever be proxies for 'potential to succeed in engineering'; previous performance/qualifications in Maths and other subjects (not only sciences) can be one indicator, but they are never the full story. This model seriously limits the common engineering admissions practices to assess the whole-student suitability for a course.

While this model avoids the unfair practice of conditional unconditional offers pre-results, our membership is clear that disadvantaged groups, students with disabilities, mental health issues or other special needs require a more considered and holistic approach, otherwise their potential talent could be lost. These are precisely the students who will be most harmed by a PQO approach to university entry as modelled.

In engineering we deal with a large number of applications from applicants with less-traditional qualifications and it is demonstrable that an engineering degree is a highly effective pathway to their social mobility. (The EPC will shortly be publishing research on this which will be available at [epc.ac.uk](http://epc.ac.uk) later this month.) Applicants holding such qualifications are commonly looked at individually, and assessed on their own merits, which all takes time. Further investigation of applications can also be required, i.e., fee queries, additional information required, etc. Under PQO reform, the compressed time of moving the offer process to later in the cycle would limit the opportunity for many activities for disadvantaged groups, including widescale use of admissions tools beyond A level performance to assess suitability, engineering aptitude and Summer schools.

In particular, many engineering departments currently have maths tests to account for the fact that many BTEC applicants do not have A-level Mathematics. PQO would compress the timings for these tests and potentially mean that students have very little time to prepare for them.

The EPC is aware that a number of engineering departments have a system of alternate offers, such as to Foundation courses or less established courses, which meet important applicant needs identified through early engagement with potential applicants and offer holders (such as the need to mitigate for ill-advised A level course choice, results not matching presented potential, etc.) Engineering departments do a great deal to support students with suboptimal subjects and lower UCAS points to engineering. This is crucial for the engineering skills pipeline.

We are unclear how contextual offers – commonly deployed in engineering – might work in this model. While the model could improve aspirations for disadvantaged applicants whose grades might be underpredicted who may not otherwise have applied to particular institutions without prior knowledge of grades, it could conversely affect those from widening participation backgrounds who might be put off by the stated entry requirements post-qualifications; widening participation students may not be aware that they are eligible for a minimum offer (and eligibility will vary dependent on engineering course and provider).

In either case, in order to take advantage of the reforms, these students would need a significant amount of advice and support from schools over the Summer so may still be disadvantaged – independent schools will have more resource to do this. If equitable support were not in place, then any advantage to these students would be undermined.

We have already discussed how engagement with students coming from non-standard backgrounds becomes more difficult under this model. From the applicant's perspective, there is less time to make an informed reply to an offer based on a genuinely consultative process with a provider.

Finally, there are clear widening participation implications for universities in the UK administrations where non-A level qualifications (Highers and Advanced Highers in particular) and standard and intake is capped for various groups by the government and attainment of target is measured through intake ratios between the target groups.

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

**Please explain:**

We do not intend to repeat the common sector arguments here in relation to the unsuitability of the current emphasis on end-of-study exams at level 3 nor the inaccuracy of (predicted) exam grades and the apparent disadvantage this creates (notwithstanding the many non-academic / social factors which influence how aspirational or otherwise applicants chose to be in their applications. We do assert that to be fair to the applicant, s/he needs a measure of likely attainment to target applications, whether that be a cautious, realistic, or aspirational measure. This is especially so for subjects with specific or necessarily high subject grade expectations to access learning, such as engineering (or for high-demand courses, which demand a high exchange value in the HE marketplace).

In EPC research (conducted in autumn 2020), 94% of our members that we surveyed used predicted A level grades in their admissions process, and 88% used other predicted level 3 grades. We are concerned that these proposals cater only for A level applicants and not the wide range of qualifications from which engineering applicants are drawn to maintain the pool of skilled engineers demanded by the UK economy.

Fundamentally though, as most applicants do not have the opportunity to study engineering at school, previous performance in level 3 qualifications in Maths and other subjects (not only sciences) can only ever be proxies for suitability, engineering aptitude and potential to succeed in engineering.

Three-quarters of those we surveyed already used GCSE results to assess applications in engineering. Predicted grades enable students who underperformed in their GCSEs to obtain places as a result of their improved performance.

Course and institution choice in engineering needs support not available in the school system. Since most students do not have the opportunity to study engineering at school, there is an absence of common understanding of the subject at level 3.

Consequently, applicants do not fully understand what engineering entails. This already places the emphasis on IAG in relation to engineering study in higher education on the HE sector itself. The opportunities for personalised IAG are nothing short of sabotaged by this model.

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

Yes

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

In engineering, international students make up approximately 25% of undergraduate students (even through UCAS), so on the assumption that international applicants remain out of scope so as not to disadvantage them or threaten UKHE's competitiveness, then almost all engineering departments would be operating a two-tier admissions system at undergraduate level (see earlier comments).

The necessary existence of tandem undergraduate admissions systems highlighted by engineering's internationalism undermines the admissions reform per se. Some of our members have expressed concern that if algorithmic admissions formed the basis of the centralised admissions offer, pursuing a route of Direct Applications only could be an option as they would not want to move to a more impersonal 'sausage factory' style of student recruitment and selection.

Indeed, other mitigations to the inadequacy of this model for non-traditional or widening participation students which would be needed to support robust and equitable admissions to engineering are tantamount to alternative application systems. We would welcome solutions for already-qualified applicants to be able apply and be placed throughout the cycle, rather than wait for the prescribed 'window' but warn of the competitive gaming in interpretation of eligibility which is likely to emerge.

Clearly, any two (or more) tiered system would also be open to creative interpretation and abuse. For example, could universities recruit outside of the reformed admissions system on an international fee basis to those UK students with the means to pay international fees? Or would the most internationally desirable engineering departments fill their places with overseas demand, both depriving UK students of the top-sliced offer and, ultimately, given that international students are less likely to stay in the UK after study, exporting the engineering HE talent so desperately needed to address the well documented engineering skills gap in the UK.

The reduced applicant engagement coupled with an emphasis on the 'market' and the trading on grades would reduce the visibility of different styles of teaching,

engineering courses and types of labs etc. It is difficult to see how a genuine PQA model would work in a consultative and neutral way in pursuit of the best interests of the applicant, when the system suggests students must barter only on grades.

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

Yes

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

If applicants were only allowed to pursue one firm offer at a time, we could plan numbers, but the first-come, first-served queue may adversely affect less well-organised (slower-responding) applicants.

If multiple applications to many institutions are allowed, then there will still be a lot of uncertainty in terms of numbers that could impact planning and timetabling, as for Model 1. This has a direct impact on HE delivery in semester one. If only a small number of applications are allowed (e.g. two, as is the case with the current system where applicants can hold two offers) the uncertainty would be less, but still potentially significant, unless there was some way for institutions to know their relative ranking in the applicants' preference. We would need to increase certainty on likely firm acceptances early on, after results day. This could be handled by e.g., allowing fewer offers per applicant (2-3) or having a precise calendar for making firm choices.

Similarly, if applicants are issued multiple parallel offers, student number planning would be difficult in terms of both guessing how many offers to issue and if an applicant replies to an offer late in the day. Part of the uncertainty in the planning processes could be mitigated by 'sector agreed' cut-off dates for final applicant replies to safeguard against long application processing impacting on admissions in other institutions.

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

### **Please explain:**

Do you mean how quickly the model could be implemented or how quickly applications could be processed under the model?

If the former, our members have told us that they would have to rewrite (and re validate) their admissions and selection process.

If the latter, please see our response to questions 1 (and 2) above, which focus on the issue of timing in this model.

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

### **Please explain:**

In engineering, there is widescale use of admissions tools beyond A level performance to assess suitability, engineering aptitude and potential. Interviews are an important part of many engineering admissions process, since level 3 qualifications can only ever be proxies for 'potential to succeed in engineering', as many applicants do not have the opportunity to study engineering at school and they do not fully understand what the subject entails. Previous performance/qualifications in Maths and other subjects (not only sciences) can be one indicator, but they are never the full story.

This model would restrict the available time window for essential non-exam-based entrance processes (interviews, suitability / competence tests, etc), eliminating the more practical and creative aspects of effective student recruitment and selection which most benefit engineers. Non-exam-based and creative aspects of effective student recruitment and selection are exactly what applicants to engineering benefit from most, particularly those from non-traditional backgrounds.

Engineering academics and admissions tutors already successfully deal with a large number of applications from applicants with less-traditional qualifications; these are looked at individually, and assessed on their own merits, which all takes time. Under PQA reform, compressed time of moving the offer process to later in the cycle would restrict the available time window for other entrance processes (interviews, competence tests, etc) for many widening participation activities and in high-demand courses.

In order to ensure applicants are able to access the courses and institutions which are well-suited to them, non-exam-based measures will need to be retained. Interview days, for example, currently form an important part of many of our members' applications and admissions processes but are not viable until an application has been received, at which point there will not be enough time to act. Engineering departments have indicated they may need to mitigate this through running some sort of 'engagement' days, where informal assessment of potential applicants could take place, so that this information (currently gleaned from interviews or other activities) can be factored into the decision-making process about whom to give offers to after results day. This could include assessment centres (including online) to give earlier indications of performance and the concept, devising, testing and introduction of additional selection tools (instead of interview). But in this model, the sector will spend diffuse resources and time inefficiently 'assessing' potential applicants, without knowing if they will make an application.

Among members already taking an algorithmic approach to admissions, interviews were considered a conversion tool, so efficiencies would be made by removing the need for interviews. But even in this scenario, the increased reliance on exams created by the inability to conduct the practical elements of a more innovative admissions processes were recognised.

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

### **Please explain:**

The timeframe for applicant decisions is short. Student offer-making post results will create a limited and pressured window for students to reply to their offers. There is clear evidence that decision-making in the current post-qualification offer-making Clearing environment is poor, resulting in increased non-continuation on matches secured in this way. Unless every applicant is successful in securing an offer that they want to accept, there will need to be more than one round. If applicant acceptances and rejections of offers are pushed into post-qualification, this will also impact on the window for post-award admission "clearing clearing" processes, further exacerbating this problem.

The in-school window of support opportunity could be lost meaning insufficient support for applicants during the offer acceptance period. Within this model, there will also be less HE resource available to help with IAG during the crucial Summer window. Empirically, it is already hard for some HEIs to resource tailored support in engineering to close the gap from what is offered in schools.

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

**Please explain:**

The EPC's risk-benefit analyses highlight many risks in this approach with little evidence of known benefits to students.

A fundamental flaw with this model is that emphasis on the known exam grades comes at the direct cost of all other elements of admissions already widely used to accurately predict the success of an applicant-course-provider match. In targeting pockets of unethical practice, the proposals fundamentally underestimate the complexities and good practice in admissions currently to support all applicants and perpetuate the current unsatisfactory Clearing practice.

We urge government to consider why all of the component admissions practices processes occur within the range of admissions portfolios, focusing on the purpose they serve. Our membership is clear that disadvantaged groups and others underrepresented in HE need more considered and holistic approach, otherwise their potential talent could be lost. These are precisely the students who will be most harmed by a PQO approach to university entry as modelled.

The proposals do not address the underlying social injustice; poor and unequitable access to knowledge, information and advice on HE and career choice in the pre-HE school system, particularly in engineering. The model does not take adequate account of non A level qualifications nor the devolved administrations' needs.

It is our experience that the juxtaposition of PQA and PQO proposals is leading, tending to the comparison of PQA with the current system and PQO to the PQA system. As such, while this model was generally considered less disruptive than PQA by our members, the majority of benefits identified and valued (distributed workload, informed selection of courses, clarity of applicants for planning purposes, longer recruiting season, opportunity for longer-term relationships with applicants) were those represented in current application system.

## **Further Questions**

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

**Please explain:**

We are surprised that this consultation does not ask about the model's impact on HE's ability to deliver its key teaching and research mission to students beyond admissions, including:

- Operational overlap between the intrinsic HE offer for existing students and time-compressed and intensive admissions of the next cohort.
- Reduced contact time. Engineering has more contact, teaching and learning time than most subjects.
- Compromised examining duties and bunched student assessments potentially leading to increased non-completion.
- Threat to vital research activities / conferences which are essential for innovative engineering course design and academic sustainability.
- Threat to MSc projects supervision.
- Detriment to staff wellbeing.

Our members survey suggests a perception that the resource pressures of admissions reform implementation would not be equitably absorbed by the sector, putting some providers at a disadvantage. We are concerned with the implicit assumption throughout the consultation that university admissions can ever be a one-size-fits-all system. Some of our members felt that the proposals make assumptions which lead them to target large, selective, high-tariff institutions (all emphasis on qualifications and intense Summer staffing). In smaller institutions where the same staff run all processes, this approach is less viable. A poorer applicant experience was anticipated in smaller (less well resourced) engineering admissions teams and for non-algorithmic admissions (including widening participation) institutions for which qualifications are only part of the application process.

Additionally, the model puts additional pressure on onboarding student support, including drawing up learning support plans where necessary for start semester, finalising student accommodation, timetabling and resource planning.

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

No

**Please provide a reason for your answer:**

In EPC member research conducted in autumn 2020, more than two-thirds of respondents used personal statements to assess applications in engineering and 58% reported that they were wedded to their use in future. Most members who engaged with our recent PQA consultation felt that they should not be removed

from the process.

Since most students do not have the opportunity to study engineering at school, qualifications can only ever be proxies for 'potential to succeed in engineering'; paper qualifications in Maths and other subjects (not only sciences) are only part of the applicants' full story. Personal statements were felt particularly useful to gauge interest in the programme and provide insight to the candidates' thought processes. They are also deployed to allow wider opportunities from those from disadvantaged backgrounds/lower performing schools and to support the interview process.

For the most high-demand degrees, some form of individual differentiation is necessary and the personal statement is one of the methods used for delivering this. However, we would welcome improvements to the UCAS personal statement (more 'scaffolding' to guide students, separated questions instead of one statement, etc).

### **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.**

#### **Please explain:**

A measure of likely attainment for applicants to target applications will be required in any of the proposed models. This is especially so for subjects with specific or necessarily high subject grade expectations to access learning, such as engineering (or for high-demand courses which demand a high exchange value in the HE marketplace). Future gazing is inherently inaccurate but removing predicted grades from the process would render this activity less transparent. Actual grades are also evidentially inaccurate.

The emphasis on exam grades resulting from this move is not good for engineering access. A binary, algorithmic approach to admissions was widely challenged by our membership, particularly for widening participation students. In engineering predicted – and actual – grades are just one proxy for suitability, engineering aptitude and potential to succeed in engineering.

Predicted grades also used to enable students who performed badly in their GCSEs to obtain places as a result of their improved performance.

### **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?**

#### **Please explain:**

As one in every four undergraduate engineering students is international (many more for some disciplines and providers), there would need to be (at least) two admissions processes in pretty much every engineering department (see the EPC website for an institutional level appraisal). Even if UCAS opted to continue to process international applications centrally through a non-PQA route, universities would likely also opt to continue to accept international students directly as they will continue to administer postgraduate admissions processes. The distinction between undergraduate and postgraduate courses is more blurred in engineering than in any other subject (integrated masters) which compounds the engineering import dependency. Overall, nearly one in three HE enrolments in Engineering and technology are from outside of the UK; that's double the proportion across all science subjects and far greater than the one in five across all subjects).

A "two-tier" admissions system in engineering to cater for international demand does present a barrier to UK students; earlier international admissions processes could lead to fewer places for UK students at the most competitive providers. This would most adversely affect those from disadvantaged backgrounds who typically apply later.

It would also be open to creative interpretation and abuse. Imagine a system where the most internationally desirable universities recruit outside of the reformed admissions system on an international fee basis, perhaps at best exporting the engineering HE asset or at worst selling early confirmation to those with the means to pay international fees.

The need for two, three, four, or more tandem admissions systems in which providers operate undermines the admissions reform per se, presenting a fundamental threat to a central undergraduate admissions system.

### **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.**

#### **Please explain:**

In engineering, international students make up approximately 25% of students, so assuming international applicants remain out of scope so as not to disadvantage them or threaten UKHE's competitiveness, almost all engineering departments would be operating a two-tier admissions system at undergraduate level (see earlier comments).

The necessary existence of tandem undergraduate admissions systems highlighted by engineering's internationalism undermines the admissions reform per se. Some of our members have expressed concern that if a PQA 'matching' service was the centralised admissions offer, pursuing a route of Direct Applications only could be an option as they would not want to move to a more impersonal 'sausage factory' style of student recruitment and selection.

Indeed, other mitigations to the inadequacy of this model for non-traditional or widening participation students, which would be needed to support robust and equitable admissions to engineering, are tantamount to alternative application systems.

Any two (or more) tiered system would also be open to creative interpretation and abuse and gaming. In event, there would need to be solutions for already-qualified applicants to be able to apply and be placed throughout the cycle, rather than wait for the prescribed 'window' but we again warn of the

competitive gaming in interpretation of eligibility which is likely to emerge.

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

**Please explain:**

In order to thrive and maximise their attainment and future prospects, it is essential that each individual student goes to a well-suited environment for them. It is difficult to see how a genuine PQA model would work in a consultative and progressive way in pursuit of the best interests of the applicant, when the system suggests students must barter only on grades within short timeframes. Our members report that they have created and adopted detailed admissions processes based on a deep understanding of applicant need and many years' experience to support the robust selection of students who are suited to their specific pedagogy and engineering course design. Practices vary greatly within engineering and indeed between engineering and other subjects to meet the fullest possible range of applicant need.

At their heart, we do not feel that these proposals adequately grasp the complexities, strengths, and diversity in current admissions practices. As a result, they do not collectively meet individual student needs, nor enable providers to respond to them autonomously or well.

The assumptions on which the need for reform are based would be better addressed through:

- Better and equitable STEM information, advice and guidance targeted particularly at low social economic status students and ensuring they have access to level 3 provision to support HE STEM study.
- Provisions to mitigate against institutional gaming and unethical admissions practices (aka unconditional offers). A new system will inevitably create unintended behaviours in parts of the sector to seek competitive advantage. While a PQA model avoids the unfair practice of conditional unconditional offers, pre-results, our membership is clear that disadvantaged groups, students with disabilities, mental health issues or other special needs that require a more considered and holistic approach, are precisely the students who will be most harmed by this approach.
- Fewer, not more, admissions through Clearing.
- Sector quality and standard metrics that support inclusion and do not perpetuate educational disadvantage by driving siloed academic selection.

We note that the PQA model is used widely across the rest of Europe, but it is simpler to operate, in that anyone passing a BAC threshold may start at university (with large numbers dropping out after the first year). The UK has a more pro-active selection approach, seeking only to recruit students who will last the course and at higher financial and opportunity cost to them. To exercise the same diligence as currently would mean compressing the work of academics and support staff into a shorter period, at a time when they have core teaching and learning duties.

The EPC welcomes reflections on the strengths and weaknesses of the current admissions system but concludes that a fit-for-purpose admissions system should be prioritised over a simpler one (that may in any case prove just as complex in practice).

While post-pandemic is a good time to reflect on learnings from new parameters (including exam approaches) and behaviours during this time, the timing of this consultation falls short in relation to the sector's capacity to prioritise and consider this important and complex work.

## **Public Sector Equality Duty (PSED) Questions**

### **1 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).**

**Please explain:**

## **Further Analytical Questions**

### **Questions for Schools and Further Education Colleges**

#### **1 What types of costs could be incurred in delivering support for students with applications over the summer? Please also see questions a) & b).**

**Please explain:**

**a) What factors are likely to influence these costs?:**

**b) How significant do you think costs associated with familiarising staff and students with a PQA system could be (e.g. training, providing and reading guidance)?:**

#### **2 Are there any circumstances under which a PQA system (under either model) could lead to cost savings and what would these be?**

**Please explain:**

#### **3 Are you able to provide an estimate of the amount of time spent delivering support to students with HE applications, including personal statements? Please also see question a).**

**Please explain:**

**a) Are you able to provide estimates of the costs which you currently incur delivering this support to students with HE applications, including personal statements?:**



**4 Do you envisage any other impacts and costs that could be incurred as a result of changes to the HE admissions system? Please also see question a).**

**Please explain:**

**a) What form would these wider impacts and costs take and how significant would they be? Are you able to provide any estimates of these wider impacts and costs?:**

### **Questions for Higher Education Providers**

**1 How significant do you think the costs associated with familiarising HE admissions staff (e.g. training, providing and reading guidance), could be?**

**Please explain:**

**2 Are you able to provide estimates of the costs incurred processing and responding to student applications? Please also see questions a), b) and c).**

**Please explain:**

**a) What factors are likely to influence these costs?:**

**b) Are there any circumstances under which the costs of processing student applications could increase under a PQA?:**

**c) How might the compression of the HE admissions timetable affect costs and what could the likely size of impact be?:**

**3 Could streamlining the admissions system, through a model of PQA, lead to cost savings? Please also see questions a) and b).**

**Please explain:**

**a) What factors of a PQA system could influence cost savings?:**

**b) Are you able to provide any estimates of the potential size of these cost savings either in absolute or relative terms?:**

### **Questions for Awarding organisations and HE sector agency bodies (with a statutory, regulatory or service delivery function)**

**1 How significant do you think the costs of familiarising staff (e.g. training, providing and reading guidance) could be?**

**Please explain:**

**2 What are likely impacts of moving results days for level 3 qualifications on your operations, infrastructure and processing systems?**

**Please explain:**

**3 What are the main types of costs that could be incurred as a result of moving to a PQA system? Please also see questions a) and b).**

**Please explain:**

**a) What factors are likely to influence the type and size of the costs which could be incurred?:**

**b) Are you able to provide any estimates of what the implementation costs could be?:**

**4 To what extent could moving to a new HE admissions system generate cost savings? Please also see question a).**

**Please explain:**

**a) Are you able to provide any detail on the potential size of cost savings either in absolute or relative terms?:**