Admitting mistakes

Creating a new model for university admissions

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After three years in teaching, he moved into politics to work on policy development and research across the education, skills and welfare sector. This included roles at think tanks such as Policy Exchange and the Social Market Foundation, Pearson, G4S and working for an MP.

He subsequently spent two years as an advisor to ministers at the Department for Education, first under Michael Gove and then Nicky Morgan, where he helped to design and deliver new policies as well as improve existing ones. After leaving the Department for Education, he spent two years teaching at a Sixth Form College before moving back into education policy and research, first at the Reform think tank and then at Policy Exchange.

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Contents

Executive Summary

Since UCAS was created in 1993, it has administered a system of competitive applications from students in which universities choose whom to admit. Students must submit various types of information including their predicted exam grades, a 'personal statement' and academic references, after which universities assess the information provided by candidates and decide whether to offer them a place. This admissions system has remained almost unchanged for the past three decades, but this inertia should not necessarily be interpreted as an indication that the UCAS system is working well.

Politicians from both major parties have raised serious concerns in recent months about university admissions practices, while the Office for Students (OfS) has launched a review of the entire admissions process in its capacity as regulator of the Higher Education (HE) sector. Given this intense pressure, maintaining the status quo is no longer an option. The new rules on admissions proposed by the OfS last month to ensure that universities demonstrate a 'socially responsible approach' during the COVID-19 crisis shows that it is perfectly feasible to change the admissions system – even at short notice. It is now simply a question of which changes ministers and regulators wish to make once the crisis subsides.

This report starts from the widely accepted premise that HE admissions must be:

- **Fair** – every student, irrespective of their income or wealth, should have access to the same universities and degree courses;

- **Transparent** – every student should have access to the information they need to make informed choices about the different options available to them;

- **Equitable** – every student, regardless of their background, should be able to compete for a place at university on a 'level playing field' with other students.

The report analyses the three issues that have attracted the most attention in terms of their respective impact on the fairness, transparency and equity of the admissions system: the use of predicted grades for university applications; the growth of 'unconditional offers' from universities; and the barriers facing disadvantaged applicants.

The use of predicted grades

According to UCAS, only 21 per cent of applicants met or exceeded their predicted grades in 2019. In addition, 43 per cent of accepted applicants had a difference of three or more A level grades compared to their predicted grades – an increase of 5 percentage points since 2018.

Previous research has also shown that high-achieving students from the most disadvantaged backgrounds are more likely to be under-predicted than other students. Furthermore, the whole notion of an application process based on nothing more than guesswork from teachers is plainly unfair on students and creates inequities when selecting, and applying for, universities because schools and colleges with the most resources and best connections will inevitably navigate the admissions system more successfully. The significant workload that predicted grades place on teachers, schools and colleges should also not be underestimated. A recent review of admissions practices in 29 countries found that none of them apart from the UK offered university places on the basis of predicted grades, demonstrating how our system is an outlier by international standards.

Some observers see 'post qualification applications' (PQA), where prospective students would not submit their application until after they receive their exam results, as the solution to concerns over the use of predicted grades. Almost ten years ago, UCAS put forward this exact proposal on the basis that it would "remove unpredictability from the process and be fairer to all applicants". However, the logistical challenges that a PQA system would face – particularly the major changes required to A-level examination dates and the start of the university term – meant that UCAS had to abandon their plans in the face of opposition from universities, schools, the examination regulator Ofqual and awarding bodies. Clare Marchant, chief executive of UCAS, has said that, while UCAS is not opposed to PQA in principle, it would require a huge shake-up at a time when schools and universities have "much more important things to deal with". This may be true, but it does not avoid the fact that basing an admissions system on notoriously inaccurate predicted grades is neither fair, transparent or equitable.

The growth of 'unconditional offers'

Until a few years ago, 'unconditional offers' - when an HE institution guarantees the applicant a place before their exam results are known - were hardly mentioned, with a mere 1.1 per cent of applicants receiving an offer with any unconditional component as recently as 2013. The same cannot be said today. Last year, 38 per cent of applicants received such an offer. The biggest driving force behind this rise has been the increasing use of 'conditional unconditional offers' – when an offer is originally 'conditional' but is converted to an unconditional offer if the applicant selects that university as their first choice. These were given to 25 per cent of applicants in 2019 – around three times the figure in 2016. Almost two-thirds of HE institutions now use unconditional offers as part of their recruitment strategy. For example, the University of Suffolk gave offers with an unconditional component to 85 per cent of applicants last year (up from 0.5 per cent in 2013), while institutions such as the University of Roehampton and Falmouth University gave such offers to around 75 per cent of applicants.

Senior politicians and the OfS have been highly critical of unconditional offers, describing them as 'pressure-selling' by universities. In his first major speech as Education Secretary last year, Gavin Williamson said there is "nothing to justify" their "explosion in numbers". Even so, many universities have ignored these criticisms, with one vice-chancellor even describing such comments as "a very dangerous, authoritarian course". Far from curbing their use of conditional offers, the HE sector has instead chosen to hide behind the *Higher Education and Research Act 2017* to shield themselves from government action on this matter. To avoid further scrutiny over unconditional offers, some universities are just swapping them for other similar strategies. For example, the University of Birmingham - one of the most prolific users of unconditional offers in recent years - has simply replaced their unconditional offers with a new 'attainment offer' of three grade C's at A-level, which applicants would only receive if they turned down all their other offers. This ploy has been described as "a backdoor unconditional offer. It's a game they are playing to scoop the punters."

Perhaps the worst aspect of unconditional offers is that universities continue to use them despite being aware of the harm they cause. In 2019, 43 per cent of applicants holding a conditional offer missed their predicted A-level performance by three or more grades, but this rises to 57 per cent for applicants with an unconditional offer (an increase of five percentage points since 2018 and almost 20 percentage points since 2013). In addition, analysis by the OfS estimated that unconditional offers lead to a 10 per cent rise in the drop-out rate for young HE applicants. School and college leaders have also voiced their frustration, saying unconditional offers have "more to do with the scramble to put 'bums on seats' than the best interests of students" and that "it results in many taking their foot off the pedal, doing less well than they should, and potentially damaging their employment prospects."

The barriers facing disadvantaged applicants

The latest annual review from the OfS drew attention to the fact that "although there has been a large increase in the proportion of people going to college or university over the last two decades, this expansion has not benefited all equally." Pupils who claim Free School Meals (FSM) at secondary school are almost 20 percentage points less likely to enter HE by the age of 19 compared to other pupils, and this gap is now wider than it was a decade ago. This disparity is even more pronounced for 'high tariff' (the most selective) HE institutions. The increase of 1.7 percentage-points in the proportion of FSM pupils attending these institutions has been dwarfed by the 3 percentage-point rise for other pupils, causing the gap between the two groups to widen even further. 'POLAR' data presents a similar picture, with applicants from the most advantaged areas being five times more likely to attend a high tariff institution.

UCAS produce their own 'multiple equality measure' that aims to combine the effects of other equality measures into a single value. Over the last decade, the HE entry rate for the most disadvantaged students rose from 9 to 13 per cent but grew from 51 to 58 per cent for the most advantaged students. At high tariff institutions, the proportion of 18-year-old entrants from the most disadvantaged backgrounds has increased by just a single percentage point in the last decade from 1.1 to 2.1 per cent, while the entry rate for the most advantaged students has grown by almost four percentage points. In short, HE applicants from the most advantaged backgrounds unquestionably dominate entry to the most selective institutions.

Several initiatives have sought to help more students from disadvantaged backgrounds into university. This includes the 'access and participation plans' that HE institutions must produce for the OfS alongside the £60 million provided annually by the OfS to support the National Collaborative Outreach Programme. Nevertheless, it is unclear how much of the 'outreach' and 'access' activities by universities make a difference to prospective students. A recent study of different interventions (e.g. summer schools) concluded that "there is still a lack of available evidence on the impact …on actual enrolment rates". There is also a risk that, in some cases, outreach activities might perpetuate disadvantages rather than tackle them because their delivery is often restricted to particular cities or regions.

Contextual admissions – where the social background or characteristics of an applicant is considered during the application process – are frequently cited as a way to improve the prospects of disadvantaged students. However, some universities do not use contextual admissions and the OfS has found that most of them "make no reference in their admissions information to how they use contextual data or whether they make contextual offers." This is compounded by the lack of agreement among HE institutions on which measures or datasets should be used to assess applicants' socioeconomic or educational disadvantage. As if the variation between institutions was not problematic enough, the variation *within* institutions can make life even harder for applicants as there is no requirement for universities to operate a consistent policy across its own departments. Even if an institution or department lists the factors that it considers, they typically do not explain the weighting attached to each factor or the extent of any subsequent grade reductions. The inevitable consequence of the inconsistent and opaque use of contextual admissions is that applicants who cannot access the necessary support and information are more likely to struggle to identify the right degree for them.

There are several other aspects of the admissions process that generate more obstacles for disadvantaged young people. As far back as 2004, the 'Schwartz Review' highlighted the problems with using personal statements on the UCAS application form, including the fact that "some staff and parents advise to the extent that the personal statement cannot be seen as the applicant's own work." Recent analysis of over 300 personal statements submitted to Russell Group universities by applicants with similar levels of academic achievement found

that private school pupils had statements that were "carefully crafted, written in an academically appropriate way, and filled with high status, relevant activities", which suggests they received help from the school they attended – something that other schools, especially in more deprived areas, will struggle to match.

The use of entrance exams is another significant barrier for less privileged applicants. Oxford and Cambridge make extensive use of written tests to "help tutors assess whether candidates have the skills and aptitudes needed", while subjects such as law, mathematics and medicine use entrance tests across the HE sector. Applicants who have access to additional forms of practice, support and tuition when preparing for these tests – either through their school / college or paid for by their family – will almost certainly use this to their advantage. The same goes for the presence of interviews in the selection process (especially at Oxford and Cambridge). There is no formal process within an interview for an applicant's background to be taken into account. Research evidence suggests that tutors are susceptible to numerous biases, such as giving higher ratings to applicants with similar attitudes and demographic characerics to them. Applicants from wealthier backgrounds can also invest in 'Oxbridge preparation programmes', which provide extensive support with personal statements and interview skills at a cost of hundreds, if not thousands of pounds. Such programmes further emphasise why the continued use of entrance tests and interviews in the admissions process is manifestly unfair and inequitable.

Conclusion

In recent months, both the Education Secretary Gavin Williamson and the OfS have referred to the importance of 'trust' in the context of university admissions because they realise how crucial it is that students, parents and teachers trust the admissions process when so much money and so many hopes and aspirations rest on its shoulders. In light of this, it is deeply concerning how wealth and privilege continue to unduly influence who gets accepted onto university degrees, particularly at the most prestigious institutions. This inevitably results in an overwhelming sense of unfairness as well as risking a catastrophic loss of trust - not just in the admissions process, but in the education system as a whole.

The reduction in autonomy over admissions proposed by the OfS in response to the outbreak of COVID-19 is intended to prevent universities from undermining students' interests and threatening the stability of the HE sector during the crisis, yet the protection of students and maintaining the stability of the sector should be permanent features of our admissions system rather than temporary measures. A fundamental change is therefore needed to make sure that the admissions system prioritises the interests of students, not universities, after the current

crisis is over. To this end, it is necessary for universities to give up some of the autonomy they have in relation to how they attract and select applicants each year.

The analysis in this report shows that a reduction in autonomy for universities is a prerequisite to achieving the goal of an admissions system that ensures every university and every degree is within reach of every student, regardless of their background or circumstances. Should this goal be reached, we will finally be able to claim that this country has a university admissions system built on **fairness**, **transparency** and **equity**.

Recommendations

Autonomy for universities over their admissions practices may seem intuitively appealing but the way that many universities are exercising their freedoms is undermining the interests of students as well as the integrity of our HE system. Consequently, this report recommends that, in return for the financial support that they are receiving from government to mitigate the impact of COVID-19, universities should be required to accept a new model for the whole admissions cycle that will directly address the concerns aired by politicians, regulators, teachers and the general public in relation to predicted grades, unconditional offers and the plight of disadvantaged students.

NEW ROLES AND RESPONSIBILITIES FOR THE OFFICE FOR STUDENTS

- **RECOMMENDATION 1**: The Office for Students should run a consultation process to select a 'Designated Admissions Body' (DAB) such as UCAS to operate the new admissions system for undergraduates.

- **RECOMMENDATION 2**: The Office for Students should introduce a new 'condition of registration' that applies to all HE providers. The new condition will specify that every provider must use the admissions system operated by the DAB.

MORE TRANSPARENCY FOR APPLICANTS

- **RECOMMENDATION 3**: At the beginning of the new application cycle, universities will be required to publish a 'standard qualification requirement' (SQR) for each undergraduate degree. Once published, the SQR cannot be altered by universities at any point in the application cycle, and no student can be accepted onto a degree if they fail to meet the SQR.

- **RECOMMENDATION 4**: Alongside the publication by universities of their SQR for each undergraduate degree, they must also state the maximum number of students they can accept onto each degree course without compromising the quality of education they provide.

- **RECOMMENDATION 5**: Following the publication of the SQR for every degree, a new national contextual offer (NCO) will be applied to the SQRs at all universities. The NCO will automatically reduce the grades required by applicants facing the greatest level of disadvantage, including care leavers, those living in deprived areas and students who attend a low-performing secondary school or college. The NCO will therefore create an 'adjusted qualification requirement' (AQR) for applicants who are deemed to be disadvantaged in some way.

A FAIRER AND MORE EQUITABLE WAY TO ALLOCATE UNIVERSITY PLACES

- **RECOMMENDATION 6**: 'Personal statements', references and entrance tests will be removed from the application process because they bias the whole admissions system against the most disadvantaged applicants.

- **RECOMMENDATION 7**: Predicted grades will no longer feature in the application process. Instead, applicants will be free to select any 10 university degrees and rank them in order of preference.

- **RECOMMENDATION 8**: On results day, university places will be automatically allocated based on students' lists of preferred courses. For courses that are oversubscribed, places will be allocated by lottery among all the applicants who reach or surpass the SQR (or AQR, where applicable). For courses that are undersubscribed, all students who reach or surpass their SQR (or AQR) will be admitted.

1. Introduction

"It is essential that the arrangements for the selection of students should not only be fair, but also that they should be seen to be fair." [1]

Although the landmark review of Higher Education (HE) by Lord Robbins in 1963 (the 'Robbins Report') is best known for triggering the significant expansion of university places over subsequent decades, it also set a new course for many other areas of university life. On the issue of student admissions, the Robbins Report was keen to emphasise that universities should not be "forced to accept or reject any particular student". Even so, in the very next sentence it stated that this freedom from government intervention should be qualified "if institutions displayed tendencies to reject [students] on racial, social or other grounds extraneous to academic suitability". [2] This was an important recognition that the autonomy enjoyed by universities over their admissions processes should never be absolute. The Robbins Report had thus highlighted a deep-rooted tension between universities being able to use their autonomy to suit their own interests as opposed to acting in the best interests of students and wider society – a tension that still exists today.

Our current system of university admissions is, in the words of former universities minister David Willetts, "medieval" and very unusual by international standards. [3] It revolves around a centralised admissions service for undergraduates that dates back to 1961 when the UCCA (Universities Central Council on Admissions) was formed to help universities manage multiple applications from students. In 1993, UCCA merged with its partner organisations PCAS (Polytechnics Central Admissions System) and SCUE (Standing Conference on University Entrance) in 1993 to create one independent service – the Universities and Colleges Admissions Service (UCAS). [4]

Over the last three decades, UCAS has administered a system of competitive applications from students in which universities choose whom to admit. Students must submit various types of information including their predicted exam grades, a 'personal statement' and academic references, after which universities assess the information provided by candidates and may offer them a place. Having a centralised system, in the sense that students only make one application for multiple universities and other HE providers, is often cited as a strength of our admissions system compared to other countries.

In 2019, a record 541,240 people were accepted through UCAS to start an undergraduate course, from a total pool of 706,435 applicants. Last year also saw a new record entry rate for UK 18-year-olds of 34.1 per cent. [5] One might look at these overall figures and assume that the

university admissions system is in good health, yet there have been several interventions over the years that sought to highlight concerns over the way students apply to HE in this country.

In 2003, the Labour government commissioned Steven Schwartz, then Vice-Chancellor of Brunel University, to lead an independent review of "the options that English higher education institutions should consider when assessing the merit of applicants for their courses" (the 'Schwartz Review').[6] The review opened by saying "a fair and transparent admissions system is essential for all applicants", adding that "it is vital that all stakeholders in the admissions process – applicants, parents, schools, colleges, teaching and admissions staff – believe the system is fair."[7] Although the Review was keen to assert the autonomy of HE institutions over their admissions policies, it identified "a number of issues that need to be addressed".[8] These issues included the differing interpretations of 'merit' and 'fairness' among universities, the difficulty faced by applicants in knowing how they will be assessed, the lack of consistency in how information is used to assess applicants and the burden of additional assessment (e.g. entrance exams) that some applicants face.[9]

To tackle these issues, the Schwartz Review recommended that all universities and colleges should adopt a set of principles to promote 'fair admissions', declaring that every admissions system should:

- be transparent;

- enable institutions to select students who are able to complete the course as judged by their achievements and their potential;

- strive to use assessment methods that are reliable and valid;

- seek to minimise barriers for applicants; and

- be professional in every respect and underpinned by appropriate institutional structures and processes.[10]

Although some institutions have altered their internal processes and procedures in recent years, partially in response to the Schwartz Review, there have been no substantive changes to the way the UCAS application system operates for undergraduates. This inertia should not be interpreted as an indication that the UCAS system is working well. On the contrary, the discontent among politicians with the existing UCAS model has become increasingly apparent. In April 2019, then Education Secretary Damian Hinds announced a review of university admissions practices. This review was intended to focus on 'unconditional offers' (when students are accepted by a university irrespective of the grades they achieve in their A-level or equivalent examinations) and 'widening participation' (increasing the number of

young people attending HE institutions from under-represented groups e.g. those from disadvantaged backgrounds).[11]

In addition, both the main political parties committed to changing the admissions system in their recent election manifestos. The Conservative Party wanted to "improve the application and offer system for undergraduate students" and their approach would be "underpinned by a commitment to fairness, quality of learning and teaching, and access."[12] Meanwhile, the Labour Party manifesto stated their desire to "introduce post-qualification admissions in higher education, and work with universities to ensure contextual admissions are used across the system."[13]

It is not just politicians who sense that the existing UCAS system needs to be reformed. The Office for Students (OfS) – the regulator of HE in England established in 2018 – announced in February that its upcoming review of admissions will be based on the same principles as the 2004 Schwartz Review. This new review, which will report later this year, has asked respondents for their views on:

- the use and accuracy of predicted grades and personal statements;

- the role of contextual information for students from disadvantaged backgrounds;

- the use of unconditional offers;

- the use of incentives and inducements in the admissions process;

- the overarching transparency, fairness and effectiveness of the admissions system.[14]

The three options for reform set out by the OfS are to either retain the current system with some changes, introduce 'post-qualifications offers' (where students apply before results day but offers are only made afterwards) or introduce 'post-qualifications applications' (where students apply and receive offers after results day).[15] The view of the OfS is that "to the extent that the existing system is not serving [students'] needs in a fair, transparent and inclusive way, it must change".[16] Meanwhile, Universities UK (UUK) - which represents 136 universities - set up its own review of admissions practices last summer that was tasked with ensuring "they are fair, transparent and operating in the best interests of students."[17]

The British public are also concerned about the current situation, as demonstrated by a survey of almost 5,000 adults published by the Social Mobility Commission in January this year. When the public were asked how they thought the opportunities open to people from poor backgrounds compare to those for people from better off backgrounds, 65 per cent said that those from poor backgrounds had less opportunity to go to university – rising to 77 per cent when it comes to going to a 'top university'.[18]

Politicians, regulators and the public are evidently in agreement that the status quo is unsatisfactory. To begin addressing their concerns, this report starts from the widely accepted premise that HE admissions must be:

- **Fair** – every student, irrespective of their income or wealth, should have access to the same universities and degree programmes;

- **Transparent** – every student should have access to the information they need to make informed choices about the different options available to them;

- **Equitable** – every student, regardless of their background, should be able to compete for a place at university on a 'level playing field' with other students.

At the time of writing, the OfS is consulting on a set of emergency measures for the current admissions cycle in response to the outbreak of COVID-19. These measures seek to ensure that universities demonstrate a 'socially responsible approach' to admissions in the coming weeks and months in order to protect students' interests as well as the stability of the HE sector. This includes the possibility of substantial fines for any university seen to be changing recruitment practices to increase their intake beyond normal levels (e.g. offering incentives for students to accept offers) or engaging in aggressive marketing activity.[19] Although the measures are intended to be temporary, they raise important questions about whether the admissions practices of many universities in recent years are compatible with the goal of protecting both students and the wider sector. The following chapters will therefore analyse the three issues that have attracted the most interest from politicians, regulators, academics and other policy experts to understand their respective impact on the fairness, transparency and equity of the existing admissions system. These issues are:

- The use of predicted grades for university applications

- The growth of 'unconditional offers' from universities

- The barriers facing disadvantaged applicants

Universities are understandably protective of their autonomy and there are many aspects of the HE sector that rely on certain freedoms to flourish on the national and international stage. As this report will demonstrate throughout its analysis, autonomy for universities over their admissions practices and policies may seem intuitively appealing but the way that many universities are choosing to exercise their autonomy is having a damaging effect on our education system. Politicians are therefore entitled to express their doubts about whether the current setup is fair on applicants and sustainable from a political and educational perspective. For instance, former universities minister Chris Skidmore told the Education Select Committee in Parliament last year that "you cannot have autonomy being absolutely

sacrosanct" when discussing how universities are held to account.[20] Similarly, a senior official from the OfS recently noted that "institutional autonomy is not absolute. Indeed, a regulator would be completely ineffective if it were."[21]

In his speech to the annual UUK conference in September 2019, Education Secretary Gavin Williamson said "I will always speak up for your autonomy [as] I know it's what helps foster the brilliance of our teaching and our research but I also need to safeguard our reputation, so that everyone knows that they can trust the system."[22] Meanwhile, the OfS made the following observation in their 2019 annual review in relation to the way universities have responded to recent criticism: "…saying that everything is perfect in every university and college, when it plainly is not, is dishonest and corrosive, and ultimately will do more damage by undermining trust and confidence."[23] It is no accident that the Education Secretary and the OfS both referred to the importance of 'trust', because they realise how crucial it is that students, parents and teachers can trust the admissions process when so much money and so many hopes and aspirations rest on its shoulders.

This report has no desire to see universities excluded from the admissions system altogether as this would be entirely counterproductive. There are also some aspects of HE admissions that remain beneficial, such as its centralised approach. Nevertheless, the following chapters will show that there are some deep-rooted problems with the current application system that make it fundamentally unfair in many respects, which is why the manner in which universities can exercise autonomy over their admissions arrangements is no longer tenable. A new model for the whole admissions cycle will be put forward to directly address the concerns over predicted grades, unconditional offers and the plight of disadvantaged students, with the aim of building a **fair**, **transparent** and **equitable** university admissions system in this country.

2. The use of predicted grades

For decades, school and college applicants in England, Wales and Northern Ireland have applied to their chosen universities on the basis of predicted grades rather than the actual grades they achieve in their A-level or equivalent examinations. This is largely due to the timings of the education system, with school and college examinations sat in May and June, results released in August, and most university courses starting in September or October. The turnaround between exam results being released and the start of the university term is therefore only a matter of weeks for most applicants, which is why university applications are often submitted around December and January. At this time, an applicant's final grades are unknown, so teachers make predictions for their students that are entered into their UCAS application form. These predicted grades are then passed onto universities to use as part of their decision-making process regarding admissions. Most university applicants are moving from school or college straight to university, so these predicted grades are the main piece of information that HE institutions use to judge the vast majority of applications.

While the current application system is intended to allow time for both students and HE institutions to arrange accommodation and other matters pertaining to attending university, the reality is that students in their first year of school or college, aged 16 or 17, are making decisions about which universities they would like to attend often a year before they know how well they have done academically. To further confuse matters, the guidance for teachers and careers advisors on the UCAS website in relation to predicted grades is far from clear. UCAS state that "a predicted grade is the grade of qualification an applicant's school or college believes they're likely to achieve in positive circumstances"[24] without explaining what is meant by 'positive circumstances' or how such circumstances should be quantified. Moreover, UCAS suggests that predicted grades should be "aspirational but achievable [because] stretching predicted grades are motivational for students", only to warn immediately below this statement that 'inflated' predictions are "not without risk, and could significantly disadvantage [applicants]". For example, "an applicant may receive an offer(s) they are unlikely to meet, leading to disappointment on results day."[25]

The review of admissions announced by the OfS in February this year has explicitly set out to investigate the 'use and accuracy of predicted grades' alongside other topics. The burden placed on teachers by the reliance on predicted grades is a serious yet often overlooked issue, as the OfS highlighted in their review:

> *"There is anecdotal evidence that suggests that the process of arriving at predicted grades can often be the topic of protracted debate between students, school staff and parents.*

Teachers report that they are placed under pressure from senior staff, students and parents to submit what they believe to be overly ambitious predicted grades in order to facilitate applications to a wider choice of providers. The process of predicting grades may itself impact on students' motivation and aspiration, positively or negatively. If predicted grades are inaccurate, and those predictions are not then used by providers assessing applications in any event, it could be argued that the use of predicted grades does not represent an efficient use of students', teachers' or admissions staff's time." [26]

Given the vagaries inherent in teachers trying to guess how a student will perform many months before their examinations, it is unsurprising that scepticism over the use of predicted grades has existed for almost as long as the current application process itself. Although the National Committee of Inquiry into Higher Education in 1997, led by Ron Dearing ('the Dearing Report'), is best known for proposing the shift away from government grants towards tuition fees paid by students, it also considered how and when applicants make their choices about universities. The Dearing Report felt that "the current system for the admission of young school and college leavers does not provide sufficient time for students to make the best decisions" as "they have to make their selection of programmes very early with offers of places made on the basis of predicted performance".[27] In addition, the 'clearing' process "requires even faster decisions about which institution and which programme to pursue." In terms of the evidence received by the Committee, "it was put to us strongly that this system is not in the best interests of students. We agree."[28]

The Dearing Report noted that an admissions system based on actual grades rather than predicted results was "a frequently discussed alternative to the existing system" that "would assist students since they know more about their abilities (and possibly their interests) having received their examination results and having studied for longer."[29] The Report recognised that the short timeframe between A-level results and the first term at university was an obstacle to this alternative approach. Nevertheless, the Report recommended that "over the medium term, the representative bodies, in consultation with other relevant agencies, should seek to establish a post-qualification admissions system."[30]

The issue of predicted grades and the timings of applicants' decisions were raised again by the Schwartz Review in 2004. The Review cited research showing that only half of predictions were accurate and the accuracy of predictions varied by school / college as well as by subject.[31] Some universities may be able to anticipate that certain schools and subjects are more likely to be unreliable than others and might adjust offers accordingly, but this would rely on conjecture and assumptions. The consultation run by the Schwartz Review found that 54 per cent of respondents were in favour of post-qualification applications, while 34 per cent were unsure and 13 per cent were against.[32] In light of their findings, the Review called for the introduction of post-qualification applications because the "current system, relying on

predicted grades, cannot be fair [as] it does not meet the …recommended principles of fair admissions, since it is based on data which are not reliable, it is not transparent for applicants or institutions, and may present barriers to applicants who lack self-confidence."[33]

Numerous research studies in the years after the Schwartz Review emphasised the level of inaccuracy in predicted grades. A paper by Debra Dhillon in 2005 in the British Educational Research Journal found that predicted grades are typically over-optimistic, and that after correcting for chance only 36 per cent of predicted grades were accurate. Essay subjects were found to have less accurate predictions, and top grades (A) and bottom grades (U) were more likely to be accurately predicted than middle grades (B-E).[34] Another study published in the Oxford Review of Education in 2008 found similar patterns. It cited a previous study by Hayward et al. (2005) that found 45 per cent of predicted grades were correct.[35] In addition, the study's own findings similarly showed that less than half of predictions were 20 UCAS points or less away from candidate's eventual total points score.[36] In 2011, research conducted by UCAS for the then Department for Business, Innovation and Skills found that only 52 per cent of all predictions were accurate.[37]

The UCAS consultation on post-qualification admissions

Following the plethora of studies questioning the use of predicted grades, UCAS launched a consultation in 2011 that set out "a proposal to move the process for undergraduate admission to higher education in the UK to one where applications are made after examination results have been received".[38] The evidence they had accumulated showed that "many applicants are asked to make choices about courses and HEIs before they are ready" and "the cumulative effect of predicted grades, insurance choices and clearing have led to a system that is complex [and] is thought to lack transparency for many applicants".[39]

Regarding the obstacles posed by the small window between A-level examinations and the start of the university term, UCAS stated that "it is not possible to implement a post results system without a significant change to the current timetable of admissions […but] we believe the changes are manageable and are shared by all the key stakeholders in the process."[40] Their plan was to make A-levels start 15 days earlier, with results being made available by early July to allow time to 'fine tune' applications based on actual grades while students were still at school or college. The main window for most applications would therefore run from the end of June up to the third week in July. A process similar to 'clearing' would then operate from July until early October, with the university term beginning in early October for first-year students. Alongside their plans, UCAS asserted that "a system that makes judgements based on actual grades achieved and not on predicted grades will remove unpredictability from the process and be fairer to all applicants", and that "widening participation may be

facilitated if we have a fairer, more transparent and simpler system, with applicants clear at the outset whether they meet the minimum requirements for a course."[41]

Many respondents to the consultation by UCAS acknowledged the benefits of moving towards the post-results application system outlined in the consultation:

- 61% of respondents (schools and HEIs) agreed or strongly agreed that "a system of application post-results would deliver a fairer admissions process because the applicant would submit actual results and the reliance on predicted grades would be removed"

- 65% of respondents agreed or strongly agreed that "a more streamlined process would make the process easier for applicants to navigate"

- 56% of applicants agreed or strongly agreed that it "would be better to apply for university during the summer after exam results are received"

- 71% of applicants agreed or strongly agreed that "applying post-results recognises that many young people mature and may change their mind about what course they want to do during the final year of school or college"[42]

However, the overall response to the consultation was not encouraging. In particular, the difficulties inherent in implementing a post-results application system were repeatedly underlined. 75 per cent of respondents disagreed that "the resources available in schools and colleges will be sufficient to give students support to make applications and manage offers in the timescale proposed"[43] and only 26 per cent agreed that "a system of applying post-results during the summer would give universities enough time to process applications before term starts in October."[44] Furthermore, just 29 per cent of respondents agreed or strongly agreed that "bringing the A-level exam period forward by three weeks would not have an impact on results achieved."[45] UCAS reported that "there were strong indications from schools, colleges, awarding bodies, Ofqual and HEIs that the loss of three weeks' teaching time would be damaging to curriculum delivery, student achievement and standards", which "would be unfair on the majority of students who are not entering higher education." Respondents also "made clear that a change in the timetabling of A-level teaching and examinations would have an impact on the scheduling of GCSEs which would create an even bigger burden on schools." In summary, "despite a willingness to try, it appears that the practicalities and challenges of dealing with applications in the proposed timeframe might be insurmountable."[46]

Awarding bodies and the examination regulator Ofqual were similarly unconvinced. For example, awarding bodies had "in the main expressed willingness to accommodate the examination cycle in the compressed timescale" while Ofqual indicated "that if there were a

strong consensus that the proposed changes should be made, they would play a constructive role in seeking to make them happen." Nevertheless, "all also articulated the increased costs and risks very forcibly [and] while individual changes might be manageable, the cumulative effect of the changes is significant to the extent that the proposals in their current form were deemed unacceptable."[47]

In the end, UCAS was left with little choice but to abandon their plans and announced that "we are not recommending a move to a post-results system" in their own response to the consultation the following year.[48] Even so, the evidence in favour of post-qualification admissions continued to accumulate. In 2016, Dr Gill Wyness at the Institute of Education found that a mere 16 per cent of applicants' predicted grades were correct, and 30 per cent were over-predicted by at least three grades.[49] Worse still, "high ability disadvantaged students are particularly likely to fall into the category of being under-predicted."[50]

Recent calls for the introduction of post-qualification applications (PQA)

According to UCAS, only 21 per cent of applicants met or exceeded their predicted grades in 2019. In addition, 43 per cent of accepted applicants had a difference of three or more A level grades compared to their predicted grades – an increase of 5 percentage points since 2018.[51] On average, 18-year-old UK students studying A levels are predicted 2.35 grades above the grades they eventually achieve.[52] UCAS says it "is actively working with schools, colleges, and universities to improve the accuracy of predicted grades" by "publishing updated good practice guidance, and launching a free service for advisers to help them understand the accuracy of their predictions."[53] Even so, it is hard to have confidence in an admissions system that tolerates such astonishing levels of inaccuracy within one of its core features.

The use of predicted grades makes university admissions in this country unusual by international standards. A review of different systems around the world by Dr Graeme Atherton in 2018 discovered that "England, Wales & Northern Ireland are real outliers in terms of their reliance on predicted grades", adding that "of the 29 countries surveyed, students in 21 apply to HE before their final upper secondary examinations and 8 after but in none of the 29 countries surveyed are HE places offered on the basis of predicted grades."[54] This lends further weight to the notion that predicted grades are not a valid and reliable tool for assessing applications to HE institutions.

In a subsequent publication in 2019, Dr Atherton and Angela Nartey attempted to outline how a PQA system could work in practice. Their proposal bears some resemblance to the model put forward by UCAS in 2011. A-level examinations would begin just after Easter, which is much earlier than the current system (which typically schedules them in late May or June).

Results would then be published up to seven weeks after the final examination (presumably around mid-June) and a 'Higher Education application week' would be introduced in the first week of August. Applicants would receive their decisions from universities in the third week of September, with the new university term starting in the first week of November rather than October.[55]

Although the authors worked hard to adjust the school and university timetables to fit with their new model, the same challenges faced by UCAS remain. Pushing the university term back by at least a month would potentially be disruptive for both students and universities. UCAS struggled to convince stakeholders that A-level examinations could be brought forward by three weeks, let alone by four to six weeks as proposed by Atherton and Nartey. The upheaval that this would create for the GCSE examination timetable was not discussed at all, nor were awarding bodies or Ofqual apparently given much consideration.

Almost a decade after UCAS pulled back from the idea, the upcoming admissions review by the OfS is still openly considering the introduction of a PQA system. That said, they accept "for this model to be implemented, it is likely that the timings of different parts of the education system would need to change".[56] A recent survey found that 56 per cent of university applicants still believe HE institutions should make degree offers only after students have received their exam results.[57] Nonetheless, Clare Marchant, chief executive of UCAS, has stated that if a PQA system was introduced without sweeping changes to the education system then it could "really backfire". She added that, while UCAS was not opposed to PQA in principle, it would require a huge shake-up at a time when schools and universities have "much more important things to deal with".[58] This may be true, but it does not avoid the fact that basing an admissions system on notoriously inaccurate predicted grades is neither fair, transparent nor equitable.

3. The growth of 'unconditional offers'

In May each year, the UCAS undergraduate search tool goes live to allow students to begin researching their courses for September of the following year. From this point onwards, students can start (although not yet submit) their online application form. On the course listings published by each university, it names the 'entry requirements' for each degree programme – the most important (and sometimes only) part of which is the 'qualification requirements' to be accepted onto the course. This is typically in the form of the combination of A-level grades (e.g. BBB) but can also include the results of BTECs, Advanced Highers, GCSEs and the International Baccalaureate as well as admissions tests and 'Access to HE' qualifications. The UCAS website states that the reason universities set entry requirements is "to ensure you have the right skills and knowledge to successfully complete the course."[59] The grade requirements can be presented in terms of UCAS Tariff Points instead of letter-based grades, but the concept is the same.

Under the current admissions system, applicants typically apply for courses at HE institutions through UCAS based on each course's published entry requirements and subsequently receive 'offers' before their examination results are known. Historically, almost all these offers were 'conditional' – in other words, the HE institution's decision to offer a place to an applicant was subject to the applicant achieving a specific set of academic grades or meeting other relevant criteria. In contrast, an 'unconditional offer' is when, during the application process, an HE institution guarantees the applicant a place before their exam results are known. A range of additional terminology is now used to differentiate between various forms of unconditional offers:

- '**Direct unconditional offers'** are unconditional at the point when the original offer is made to an applicant, irrespective of whether the applicant subsequently selects the HE institution as their first ('firm') or second ('insurance') choice.

- '**Conditional unconditional offers**' are originally stated as being conditional but are then converted to an unconditional offer if the applicant selects that offer as their first (firm) choice.

- '**Unconditional unconditional offers**' have not been identified as conditional unconditional offers through the UCAS application system, but HE institutions may have contacted the applicant directly instead.

- '**Offers with an unconditional component**' include the full set of unconditional offers listed above, including any conditional unconditional offers made by HE institutions that are not selected by applicants as their firm choice.

How many applicants receive 'unconditional offers'?

Until a few years ago, unconditional offers were hardly mentioned in political or education circles, such was their rarity in the application process. A mere 1.1 per cent of applicants received an offer with any unconditional component as recently as 2013.[60] The same cannot be said today. As shown in Figure 1 below, the rise in the use of unconditional offers has been remarkable. Last year, 37.7 per cent of applicants received an offer with an unconditional component. The biggest driving force behind this has been the increasing use of 'conditional unconditional offers'. These were given to 8.7 per cent of applicants in 2016 but this has since leapt to 25.1 per cent of applicants in 2019. Direct unconditional offers are also used to a greater extent than before, with 11.5 per cent of applicants receiving such an offer last year.

**Figure 1: the proportion of applicants receiving different types of conditional offer in 2019** [61]
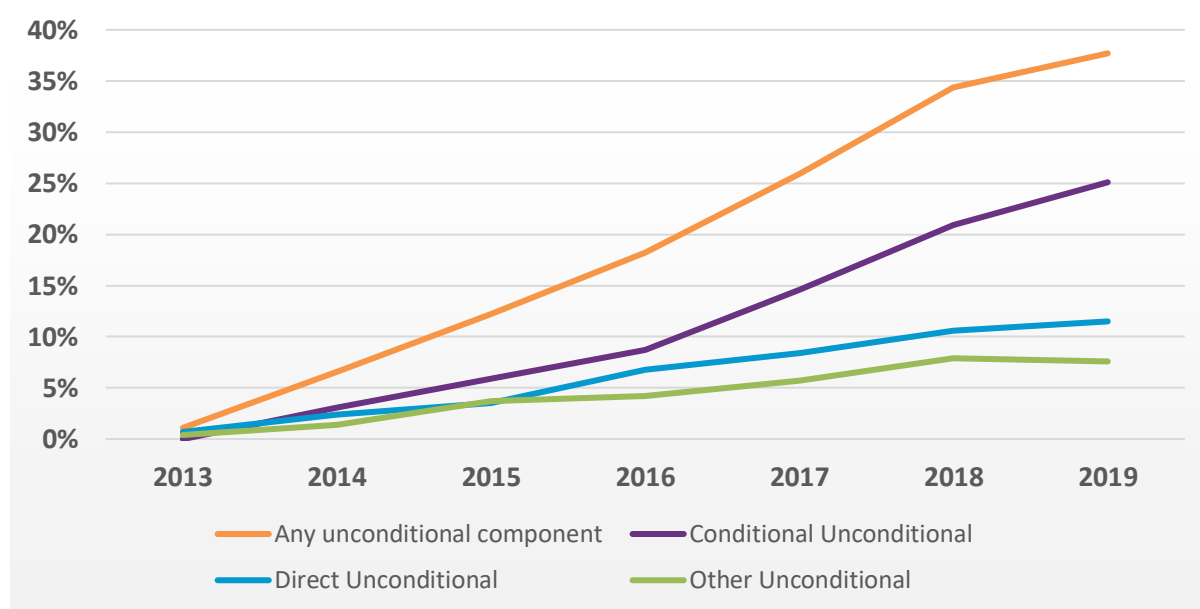
Not all applicants who receive an unconditional offer select it when making their final choices. Last year, 20.6 per cent of applicants chose their conditional unconditional offer as their first choice – a small decrease compared to 2014.[62]

Which institutions use the most 'unconditional offers'?

The growing reliance on unconditional offers is widespread. 62 per cent of HE institutions with an average of at least 500 students each year now use these offers as part of their recruitment strategy. In addition, more than a quarter of these institutions made over 20 per

cent of their offers with an unconditional component in 2019, and one in ten institutions had offers with an unconditional component making up over 50 per cent of their offers to applicants.[63] In terms of individual institutions, there are some providers who are clearly intent on using unconditional offers for the vast majority of their recruitment activity. Figure 2 shows the institutions that make the highest proportion of unconditional offers as a percentage of their total offers (excluding providers that made fewer than 500 offers in 2019). The University of Suffolk gave offers with an unconditional component to 85 per cent of their applicants last year (up from 0.5 per cent in 2013), which almost entirely consisted of direct unconditional offers. Other institutions such as the University of Roehampton (0 per cent in 2013) and Falmouth University (12.2 per cent in 2013) also use a very high proportion of unconditional offers, although they favoured conditional unconditional offers instead.

Figure 2: the HE providers that made the highest proportion of offers with an unconditional component in 2019 [64]
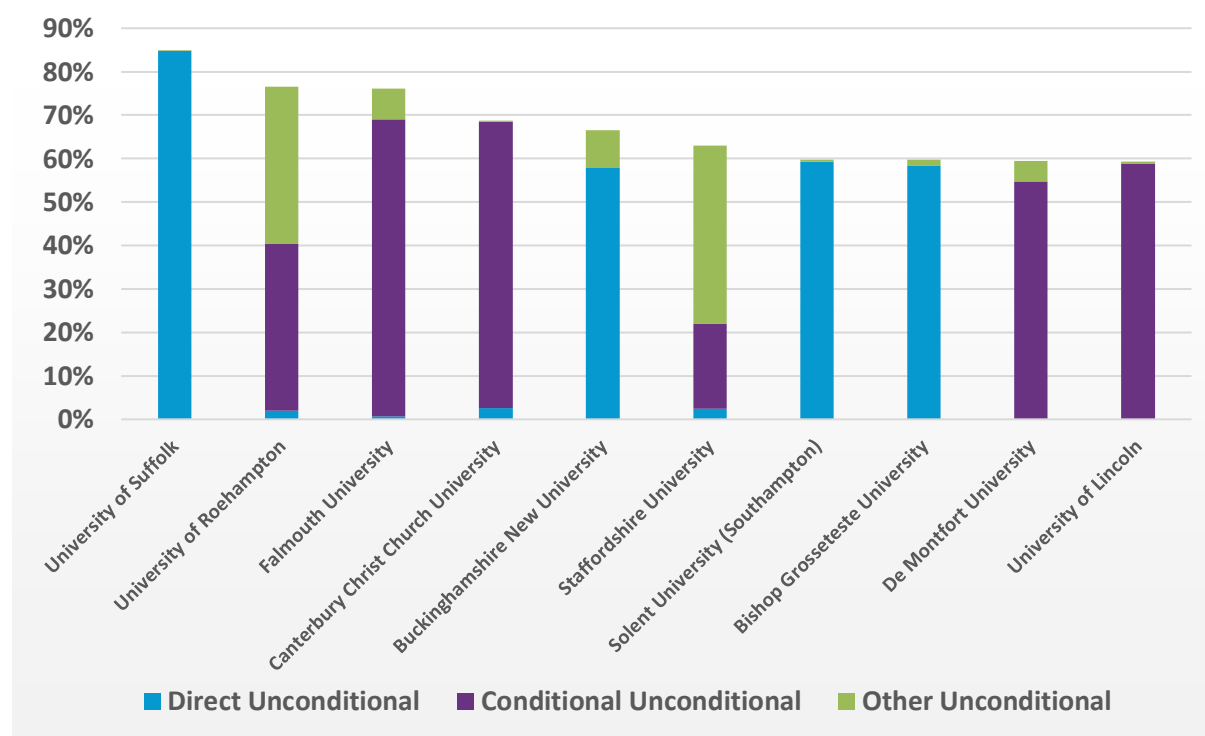
While the use of conditional offers to attract students is prevalent across large parts of the HE sector, there is considerable variation between different subjects. Figure 3 shows the groups of subjects that made the most use of unconditional offers last year. Not only do courses in creative arts and design use more unconditional offers than any other subject, they also employ direct unconditional offers to a greater extent. This is largely a reflection of the application process for these subjects, which often relies on applicants' portfolios of work and auditions as opposed to academic grades when selecting students. This means that HE

institutions such as universities and conservatoires will have already judged an applicant's suitability for a course before results day, hence their decision to use unconditional offers more freely than other subjects and disciplines.

Figure 3: the subject groups with the highest proportion of unconditional offers in 2019 [65]
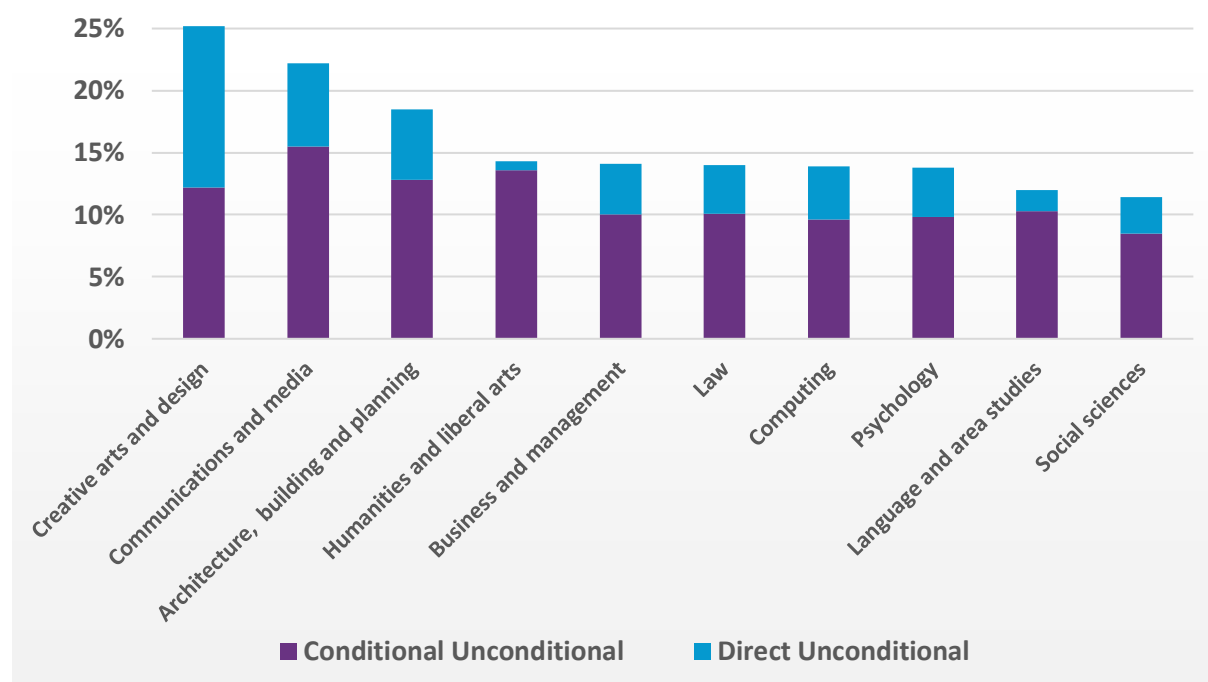
What has been the response to the rise in 'unconditional offers'?

In his first major speech as Education Secretary last year, Gavin Williamson called on universities to "get their house in order" and stop handing out conditional unconditional offers, adding that there is "nothing to justify" the "explosion in numbers".[66] His predecessor as Education Secretary Damian Hinds said in April 2019 that "it is simply unacceptable for universities to adopt pressure-selling tactics, which are harming students' grades in order to fill places [which] is not what I expect to see from our world-class higher education institutions. …That is why I will be writing to 23 universities, urging them to stamp out this unethical practice."[67]

In response to this intervention, eight universities said they had stopped or would stop offering 'conditional unconditional' offers to prospective students and several others said they would review their practices, but the other recipients simply ignored the letters.[68] Some went as far as threatening the Department for Education (DfE) with legal action for interfering in

their admissions processes. Professor David Green, vice-chancellor of Worcester University, said "we support the most vigorous opposition to this calculated attempt to introduce damaging state control over university admissions", adding that "in my view the secretary of state is treading a very dangerous, authoritarian course and if we don't stand up for university independence now, we will regret it for a generation and more." Moreover, UUK commented that independence "empowers universities to approach admissions as best fits their individual contexts and the characteristics of students."[69] Observers of the way that universities have acted in recent years regarding unconditional offers may beg to differ.

Apparently unimpressed by these reactions, Damian Hinds said at the time "it is a shame there are still some trying to justify practices which are damaging the integrity of our higher education and students' interests."[70] The reason that universities can behave in this manner is because the *Higher Education and Research Act 2017* (HERA) gives them license to do so. The Act states that "the OfS must have regard to guidance given to it by the Secretary of State [for Education]", but "in giving such guidance, the Secretary of State must have regard to the need to protect the institutional autonomy of English higher education providers."[71] What's more, there are strict boundaries on what can and cannot be included in such guidance:

> *"The guidance may, in particular, be framed by reference to particular courses of study but, whether or not the guidance is framed in that way, it must not relate to—*
> *(a) particular parts of courses of study,*
> *(b) the content of such courses,*
> *(c) the manner in which they are taught, supervised or assessed,*
> *(d) the criteria for the selection, appointment or dismissal of academic staff, or how they are applied, or*
> *(e) the criteria for the admission of students, or how they are applied."*

Needless to say, clause (e) is the most relevant to this report. It also explains why, when Damian Hinds criticised universities over their use of unconditional offers, he was met with the threat of legal action instead of a policy discussion.

As the regulator of HE in England, the OfS appears to have taken an equally dim view of unconditional offers. Nicola Dandridge, chief executive of the OfS, said last year that "we are concerned about the rapid rise in unconditional offers, particularly those with strings attached which are akin to pressure selling [as] it is plainly not in students' interests to push them to accept an offer that may not be their best option." She was also adamant that "whatever admissions practices universities choose to use, they should clearly be encouraging students to make the decision that is right for them, and not the decision that best suits the university."[72] In theory, the OfS has the power to fine universities or even strip them of their 'university' title if an institution does not meet a set of minimum requirements to register with the

regulator. Ms Dandridge has stated that "if we identify cases where unconditional offers are having an obvious negative impact on students' choices or outcomes, we are of course prepared to intervene",[73] although at the time of writing these powers have not yet been used.

There are tentative signs that the pressure on universities from politicians and the HE regulator to curb their reliance on unconditional offers is having a small impact. In January this year, Clare Marchant said UCAS had "forecast as many as 75 per cent of universities and colleges which made conditional unconditional offers in the 2019 cycle will no longer make these in 2020",[74] although no data was provided to support this assertion. Ms Marchant admitted that "whilst we predict a fall, we will likely see universities and colleges deploy other offer-making strategies, including direct unconditionals, in this competitive market."[75]

To illustrate the point, some universities are already pursuing new ways of circumventing the criticism of unconditional offers. For example, the University of Birmingham was one of the most prolific users of unconditional offers in recent years but appeared to stop using them late last year following the pushback from ministers. However, it soon transpired that the university had simply replaced their unconditional offers with a new 'attainment offer' of three grade Cs at A-level instead, which applicants would only receive if they turned down all their other offers. The university said that their 'attainment offer' was designed to reward students who made strong applications and have a good academic track record, but a source familiar with university admissions said "this is like a backdoor unconditional offer. It's a game they are playing to scoop the punters."[76]

It is important to note at this point that the use of unconditional offers does not apply to all universities in the UK. In contrast to HE institutions in England, Scotland is on the verge of rolling out a novel system for entry requirements. A report by Universities Scotland in 2019 – 'Working to Widen Access' – described several actions they will take to widen access for students from the most deprived backgrounds. One of the main proposals was that, in addition to publishing their standard entry requirements, "every Scottish higher education institution will set minimum entry requirements for their courses in 2019 for entrants […that] will reflect the best evidence on the level of achievement necessary for successful completion."[77] The report added that "minimum entry requirements are a positive statement about the level at which universities are confident an entrant stands every chance of doing well at university."[78] This commitment across all Scottish universities to being honest with students about the standard they need to reach in their school-leaving examinations in order to succeed on a particular university degree contrasts markedly with the behaviour of English universities.

What is the impact of 'unconditional offers' on students?

A survey last year by UCAS found that applicants with an unconditional offer as their first choice were less likely to feel stressed, worried or uncertain while waiting for results, and more likely to feel calm,[79] while a separate analysis by UCAS in 2018 found many applicants had positive opinions about unconditional offers.[80] Even so, other research has demonstrated that unconditional offers are anything but benign.

In 2019, 43 per cent of applicants holding a conditional offer missed their predicted A-level attainment by three or more grades, but this rises to 57 per cent for applicants holding an unconditional offer (an increase of five percentage points since 2018 and almost 20 percentage points higher than 2013).[81] To make matters worse, analysis by the OfS last year found that "a lower proportion of students who enter with unconditional offers continue with their studies after the first year, compared with students who enter with conditional offers."[82] They estimated that unconditional offers lead to a 10 per cent rise in the 'non-continuation rate' of those who begin studying in HE after leaving school or college.

While universities seem to have shown little regard for the impact of unconditional offers on student attainment, school leaders have been openly critical of the HE sector. Geoff Barton, chief executive of the Association of School and College Leaders, said last year it was infuriating that universities had responded to calls to end the use of conditional unconditional offers by making more of them. He pointed out that these offers have "more to do with the scramble to put 'bums on seats' than the best interests of students" and that "it results in many taking their foot off the pedal, doing less well than they should, and potentially damaging their employment prospects."[83]

Mike Buchanan, executive director of the Headmasters' and Headmistresses' Conference that represents many of the country's leading independent schools, agrees that pupils "take their foot off the gas" after accepting offers that do not require specific A-level grades. He added that "these youngsters have to carry their results with them for their whole careers".[84] Research has shown why this outcome can have serious consequences. According to the Institute of Student Employers, around 30 per cent of employers use A-level grades to help them select candidates,[85] meaning that a drop in A-level performance could have a detrimental impact on a student's long-term prospects. This is one of many reasons why a new approach is needed to eradicate unconditional offers to prevent any more students from suffering the same fate, even if universities are unmoved by such concerns.

4. The barriers facing disadvantaged applicants

The latest annual review from the OfS drew attention to the fact that "although there has been a large increase in the proportion of people going to college or university over the last two decades, this expansion has not benefited all equally."[86] This chapter will explore a range of issues that demonstrate how applicants from disadvantaged backgrounds still face much greater barriers to attending university than their more advantaged peers.

How large are the access and participation gaps?

The statistics on the number of disadvantaged students attending university make for uncomfortable reading. Figure 4 shows that pupils who claim Free School Meals during their time in secondary school are almost 20 percentage points less likely to enter HE by the age of 19 compared to other pupils, and this gap is now wider than it was a decade ago.[87]

Figure 4: percentage of 15-year-olds from state-funded and special schools who entered HE by age 19 (by FSM status)
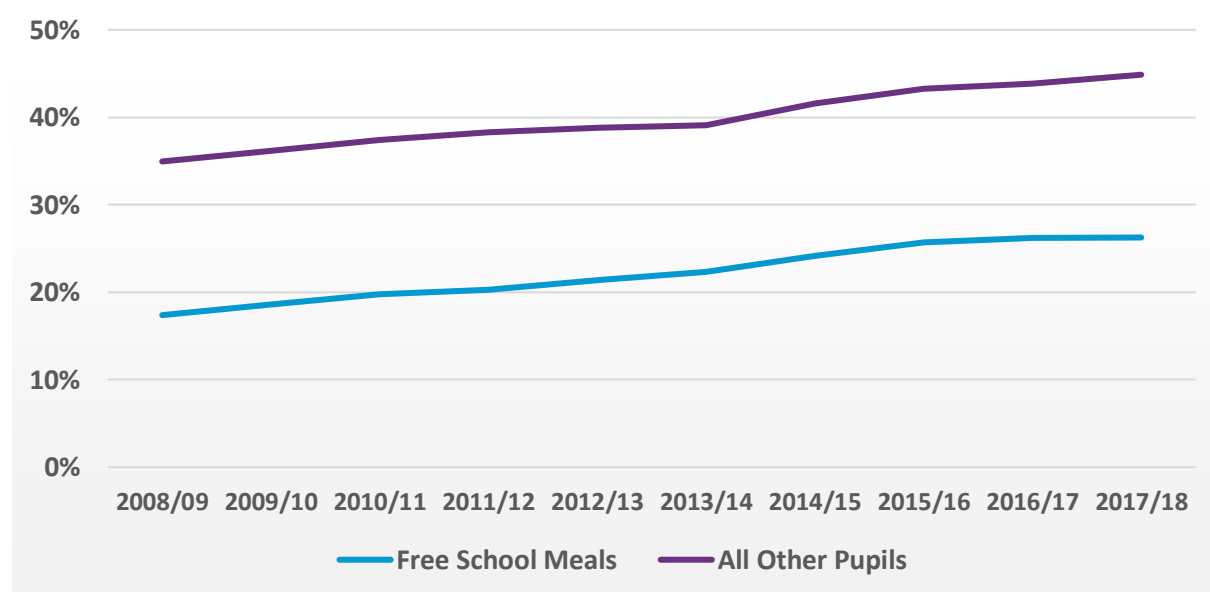
Not only is there a considerable gap between FSM pupils and other pupils in terms of their overall entry rates, this disparity is even more pronounced for 'high tariff' i.e. the most selective HE institutions (see Figure 5 overleaf). The increase of 1.7 percentage-points in the proportion of FSM pupils attending high tariff institutions has been dwarfed by the 3

percentage-point rise for other pupils, causing the gap between the two groups to widen even further over the past decade.[88]

Figure 5: percentage of 15-year-olds from state-funded and special schools who entered high tariff HE institutions by age 19 (by FSM status)
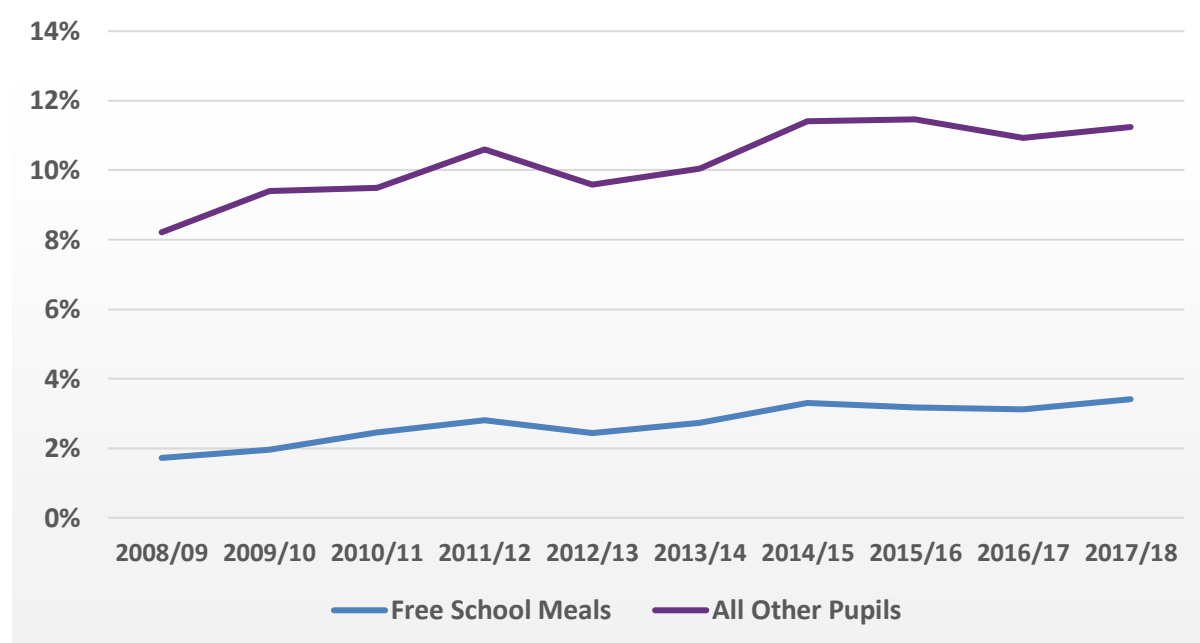
This same pattern is repeated for other disadvantaged groups. For example, the percentage of looked-after children attending HE has risen from 9 per cent to 12 per cent over the last decade compared to a rise from 34 per cent to 42 per cent for other pupils. Over this same period, the percentage of looked-after children attending high tariff institutions has remained static at 1 per cent, whereas it has risen from 8 per cent to 10 per cent for other pupils.[89]

Another way to understand the prospects of disadvantaged students is to use POLAR data, which classifies small areas across the UK into one of five groups (each representing around 20 per cent of young people) according to the level of participation in HE. These groups are ranked from quintile 1 (Q1 - lowest participation rates i.e. most disadvantaged) to quintile 5 (Q5 - highest participation rates; most advantaged). As with FSM and looked-after status, pupils from the most disadvantaged quintile are far less likely to enter HE than pupils from more advantaged quintiles (26.4 per cent versus 57.9 per cent).[90] Worryingly, the gaps between quintiles for attending high tariff institutions are especially pronounced, as shown in Figure 6. While the percentage of pupils from Q1 attending the most selective institutions has crept up from 2.7 to 3.8 per cent since 2009, the percentage of pupils from Q5 has grown from 17.6 to 19.8 per cent.[91] As a result, applicants from the most advantaged areas are five times more likely to attend a high tariff institution than those from the least advantaged areas.

Figure 6: Percentage of 15-year-olds from state-funded and special schools who entered high tariff HE institutions by age 19 (by POLAR group)
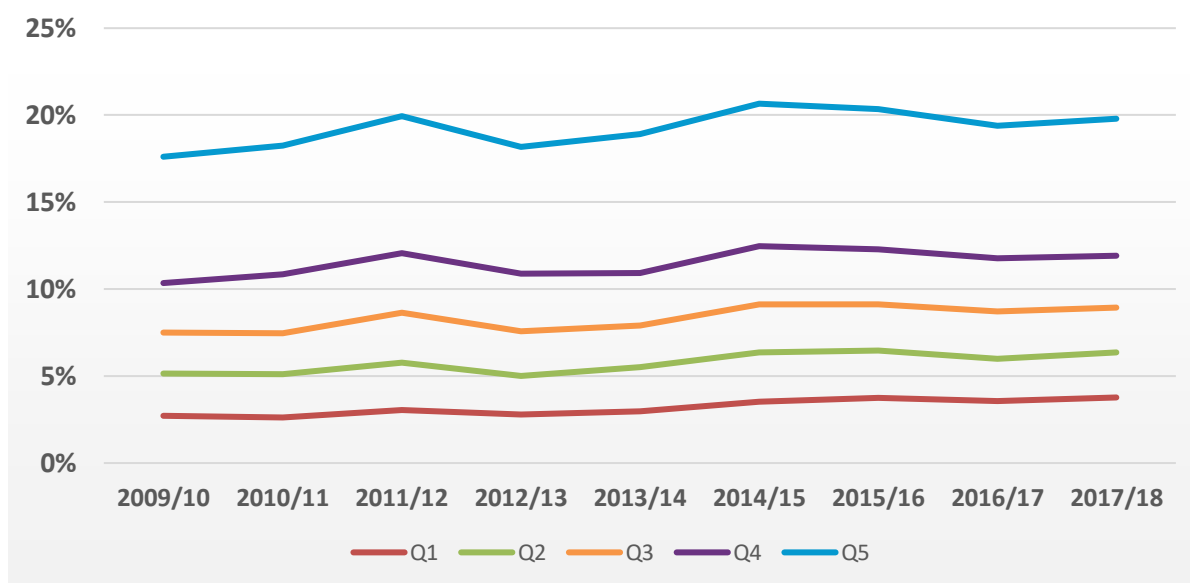
UCAS also produce their own 'multiple equality measure' (MEM) that aims to combine the effects of other measures currently used in the analysis of equality in HE (e.g. FSM status, gender, POLAR quintile, ethnicity) into a single value.[92] The MEM takes the form of a 1-to-5 group value, with individuals in 'MEM 1' being among the most disadvantaged based on their set of background characteristics and an individual in 'MEM 5' being the most advantaged. As with POLAR quintiles, the entry rates for 18-year-old students across the MEM groups differ markedly. Over the last decade, the entry rate for students in MEM 1 rose from 9 to 13 per cent whereas it has risen for students in MEM 5 from 51 to 58 per cent.[93] When focusing on high tariff institutions, the gaps are even more noticeable than those identified by the POLAR data.

As can be seen in Figure 7 (overleaf), the proportion of 18-year-old entrants to HE from MEM 1 has increased by just a single percentage point in the last decade from 1.1 to 2.1 per cent, while the entry rate for students in MEM 5 has grown by almost four percentage points. The gap between MEM 4 and MEM 5 is particularly striking. The POLAR data (Figure 6) identified a difference of around eight percentage points between the two most advantaged quintiles, yet the divide between the two most advantaged MEM groups was over 16 percentage points last year. This demonstrates the scale of the challenge facing any attempt to improve access and participation, as HE applicants from the most advantaged backgrounds unquestionably dominate entry to the most selective institutions.

Figure 7: entry rates into high tariff institutions for 18-year-olds domiciled in England (by MEM group)[94]
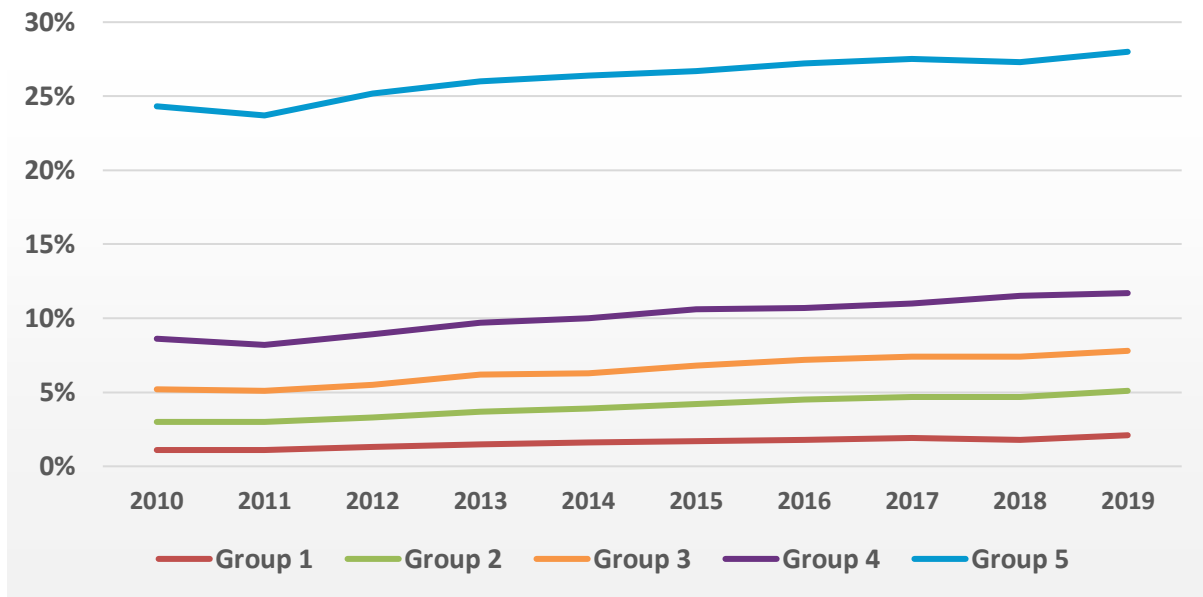
What is being done to address these gaps?

Access and participation plans

As the regulator of the HE sector, the OfS has taken a keen interest in improving the entry rates of disadvantaged groups. One of the levers at their disposal is the introduction of 'access and participation plans', which set out how HE institutions "will improve equal opportunities for underrepresented groups."[95] In these plans – which will be in force from 2020-21 – each institution sets their own targets for contributing towards working towards the OfS's own national targets as well as "addressing areas where there are specific gaps in equality at opportunity in their own organisation."[96] According to the OfS, these plans include:

- the provider's ambition for change;
- what it intends to do to achieve that change;
- the targets it has set;
- the investment it will make to deliver the plan; and
- how it will evaluate whether its work is succeeding.[97]

The plans must be approved by the OfS if an institution wants to charge higher tuition fees (currently £9,250), otherwise a lower tuition fee limit is supposed to apply. The OfS can also require institutions to "take specific actions …or report on specific aspects of its plans to ensure progress" and they will review each institution's progress on an annual basis.[98]

Although the access and participation plans set targets for a five-year period, the OfS has already published longer-term targets for the sector. For example, the gap in participation at high tariff institutions between the top and bottom POLAR quintiles should be fully closed by 2038. To drive improvements in access and participation, the OfS also distributes funding to HE providers. For 2019-20, they allocated £60 million to the National Collaborative Outreach Programme, which "funds partnerships of universities, colleges and others across the country to increase the proportion of young people from disadvantaged areas going into higher education". The OfS also provided £277 million of 'student premium' funding "for students who may need additional support to achieve successful outcomes."[99]

Any intervention from the OfS to promote the interests of disadvantaged applicants should be welcomed. Nevertheless, there are several potential issues with relying on access and participation plans to achieve this goal. First and foremost, providers spent almost £250 million in 2018 on 'access' activities as part of their efforts to widen participation but it is unclear how much of a difference this made to prospective students. Earlier this year, the Education Policy Institute (EPI) published a review of interventions that aim to improve participation for disadvantaged students. After analysing 92 studies that claimed to provide empirical evidence of the impact of outreach interventions (e.g. summer schools, mentoring programmes), the authors concluded that "there is still a lack of available evidence on the impact of outreach interventions on actual enrolment rates". Furthermore, they noted that "much of the existing evidence focusses on intermediate outcomes such as increased aspirations and awareness which may not always translate into actual enrolments."[100]

There is also a risk that, in some cases, outreach activities might perpetuate disadvantages rather than tackle them. Research by the Sutton Trust found that "many of these outreach programmes are restricted to schools local to the city or region in which the university is located",[101] but HE institutions do not share data on who has participated in each other's programmes around the country. The same research found that many outreach programmes include academic eligibility criteria (e.g. GCSE passes) set at a high threshold, yet this high bar could itself create "a barrier for disadvantaged students with the potential to do well at university but whose GCSE results are not quite as good."[102]

The EPI research showed that some outreach activities had a positive (albeit typically modest) effect on participation. To their credit, the OfS has added further requirements on HE institutions in terms of evaluating their own activities. This includes a 'self-assessment' tool for access and participation plans[103] so that more useful and accurate datasets are compiled in future for judging their effectiveness. Although it is encouraging to see the OfS exert some pressure on HE institutions in this manner, assessing HE institutions by the number of activities they engage in or the amount of money they spend is highly unlikely to produce the scale of changes required in access and participation rates for the most disadvantaged groups.

Contextual admissions

Contextual admissions – where the social background or characteristics of an applicant is taken into account during the application process – are often cited as a crucial tool in improving the prospects of disadvantaged students. Providers can use contextual admissions in several ways, such as making reduced grade offers to specific students, identifying who to select for interviews and focusing their outreach activities on certain groups of individuals. The University of Bristol is regularly named as one of the most progressive users of 'contextualised offers', which they define as "a grade reduction of up to two grades below the standard entry requirements and is made to those from backgrounds who, generally, are less likely to come here."[104] Applicants are eligible for such an offer if they have "attended an aspiring state school or college", live in an area with low progression to HE, complete a University of Bristol outreach programme or have spent time in care.

While some variation between institutions regarding their design and implementation of contextual admissions may seem inevitable, the OfS recently noted that this leads to "patchy information on how frequently and effectively contextual admissions are employed."[105] To further complicate matters, there is no agreement among HE institutions on which measures or datasets should be used to measure socioeconomic and/or educational disadvantage. As described earlier in this chapter, there are numerous ways to calculate 'disadvantage' such as FSM, POLAR, the new MEM designed by UCAS, the school that an applicant attended, whether an applicant was previously in care and so on.

Aside from the lack of agreement between institutions on how to measure the extent of an applicant's disadvantage, the way that universities and colleges utilise this information varies considerably. The OfS points out that "the majority of English universities make no reference in their admissions information to how they use contextual data or whether they make contextual offers."[106] Research in 2017 by the Sutton Trust that investigated some of the most selective institutions found little consistency even within this limited group of providers. For example, many of these institutions recorded whether an applicant had previously been in care, but Bristol, Leeds and York ignored this factor. Meanwhile, St Andrews, Sheffield and Nottingham looked at whether an applicant was a carer themselves, but no other selective institution acknowledged this.[107] In terms of area-based disadvantage, universities such as Birmingham and Exeter used POLAR data whereas Edinburgh and Warwick used the Index of Multiple Deprivation instead. Liverpool and Royal Holloway were the only institutions that considered whether an applicant had a registered disability.

The outcome of all these calculations and measures is rarely apparent to applicants. Some universities and colleges do not use contextual admissions at all, and even those that do can make it hard for applicants to gauge the impact that an institution's internal decisions will

have on them. As if the variation between institutions was not problematic enough, the variation *within* institutions can make life even more difficult for applicants as there is no requirement on universities or colleges to operate a consistent policy. The same Sutton Trust research in 2017 found that, for many universities, the decision about whether and how to use contextual admissions "is left to the discretion of individual departments or individual admissions selectors".[108] This can result in "uncertainty for applicants as to whether their disadvantaged circumstances will or will not be taken into account, and if so what they can expect from the university as a result", which "may also lead to inequitable treatment of essentially identical candidates if the university's decision about whether or not to act on contextual information is somewhat arbitrarily made."[109]

Even if an institution or department lists the factors that it will consider regarding contextual admissions, they typically do not explain the weighting attached to each factor within their decision-making process. Some universities have tried to address this by outlining a more objective approach. York St John University operates a points-based system of contextual offers, which assigns 'points' to each applicant based on a number of factors such as where they live, having a registered disability, spending time in care and the performance of their school or college. Applicants can therefore judge in advance how many 'points' they will be awarded, and thus the extent of any grade reductions they are likely to receive.[110] Regrettably, this degree of transparency is seldom matched by other institutions.

The OfS has highlighted the additional burdens that some institutions place on applicants through their use of contextual admissions, as "most require the student to fill in additional forms, make the university their firm choice, undertake a preliminary course, or sit an exam."[111] The regulator commented that "these additional requirements risk placing extra strain on candidates, at a time when they are already under pressure from their school assessments" and that "by asking students to make a university their firm choice before they receive a contextual offer, universities may be limiting students' choices."[112] As part of their own initiative to 'promote fairness and rethink merit', the OfS declared that "because social background affects school attainment, focusing only on the top A-levels means that the potential of disadvantaged students is being overlooked." Their conclusion was that "as it stands, the implementation of contextual admissions does not go far enough".[113]

Looking at the present (and stubborn) gaps between advantaged and disadvantaged groups in accessing HE, contextual admissions will be an essential component of a more equitable admissions system. Students themselves appear to agree with this sentiment. A recent survey by the Higher Education Policy Institute found that 73 per cent of full-time undergraduates say it is harder to achieve good exam results if you grow up in a disadvantaged area, and 72 per cent think higher education admissions should take account of applicants' backgrounds. Although students have mixed views on making lower grade offers to those from

disadvantaged areas, support for this approach is actually stronger among students at the most selective universities.[114]

Moreover, it is essential that greater use of contextual admissions is accompanied by greater transparency. The inevitable consequence of the inconsistent and opaque use of contextual admissions within the existing application process is that prospective students with access to the most resources, support and information through their school or family are more likely to be able to identify the right degree for them. Conversely, applicants facing the greatest level of disadvantage will be left in a weakened position. The OfS has already asserted that "greater transparency is needed across the sector" to ensure that students understand contextual admissions processes.[115] By combining the fairness generated through contextualised admissions with a renewed push for more transparency in the application process, students from the most disadvantaged groups would potentially be able to apply to university on a level playing field with other applicants.

What other barriers do disadvantaged applicants face?

As if the variations in access and participation plans and the use of contextual admissions was not challenging enough for applicants, there are many other aspects of the admissions process that generate more obstacles for the most disadvantaged young people.

Personal statements

The UCAS website tells applicants that their 'personal statement' is "a chance for you to articulate why you'd like to study a particular course or subject, and what skills and experience you possess that show your passion for your chosen field."[116] It is limited to 4,000 characters in length and applicants only produce one personal statement that is used for every course they apply to on their main UCAS form. Concerns around the use of personal statements are longstanding. The 'Schwartz Review' in 2004 highlighted the potential problems generated by using personal statements:

> *"There is wide variation in the support provided to applicants in preparing their personal statements for application forms. …Levels of understanding of what is required vary significantly among staff who advise applicants or write references. Anecdotal evidence suggests that some staff and parents advise to the extent that the personal statement cannot be seen as the applicant's own work."* [117]

This was supported by the work of Dr Steven Jones, who analysed over 300 personal statements submitted to Russell Group universities by applicants who had similar levels of academic achievement (BBB at A-level). The linguistic analysis of the statements uncovered clear differences between the statements of private/grammar school applicants and those from state schools:

> *"The statements of those from private/grammar schools were longer, with longer sentences and longer words, and perhaps more importantly, the statements from comprehensive school pupils contained more spelling errors and punctuation errors. These differences were quite significant – the chance of a personal statement received from a private school applicant being entirely free of typing/spelling errors was almost double that of one from a sixth form college applicant."* [118]

Dr Jones added that private school pupils submitted statements which were "carefully crafted, written in an academically appropriate way, and filled with high status, relevant activities", which suggests they received help from the school they attended. What's more, the analysis showed that private / grammar school pupils had access to a broader and more diverse set of work experience opportunities and extracurricular activities to discuss on their personal statements. Private school pupils were also more likely to mention the name of their schools in their statements, indicating that they felt this could put them at an advantage.[119]

Numerous academics and commentators have voiced their own concerns in recent years about the fairness of using personal statements. Dr Lee Elliot Major, then CEO of the Sutton Trust, questioned the usefulness of personal statements because there's a whole industry built around them, given how much is at stake: "Private tutors and former graduates prepare and write them for these young people. You have to look at the system and ask the question: is it fair? I don't think it is." Similarly, Simon Atkinson, who interviews medicine, veterinary and dentistry students at the University of Bristol, commented that personal statements are "too unreliable, too easy to get a lot of help with writing, and too easy to write things that aren't terribly true."[120] Professor Gill Wyness has previously concluded that, because personal statements put poorer students at a disadvantage, one solution "would be to remove the personal statement requirement from the admissions process altogether."[121]

Entrance exams and interviews

According to the UCAS website, there are a range of formal entrance exams for specific HE institutions and courses.[122] Law, mathematics and medicine require the completion of admissions tests for entry into their degree programmes. In addition, Oxford and Cambridge make extensive use of additional written tests alongside the UCAS application form. For

example, the University of Cambridge website states that "most applicants are required to take a subject-specific written admission assessment, either pre-interview or at interview" for subjects as diverse as Asian and Middle Eastern Studies, Computer Science, English, Geography, Linguistics, Natural Sciences, Archaeology and Philosophy. These 'assessments' are "designed to supplement the information in your application and provide a gauge of your abilities - to assess skills, such as comprehension and thinking skills, and levels of knowledge and understanding, relevant to your course."[123] Many other universities use admissions tests for subjects such as Business, Nursing and Social Work.[124]

Moreover, Oxford, Cambridge and UCL have decided to incorporate 'thinking skills assessments' (TSAs) into the application process for some subjects. These assessments, which are usually a pen-and-paper test lasting 1.5-2 hours, are designed to measure "your ability in critical thinking and problem solving, skills which are essential for success in higher education".[125] The results of the assessment are supposedly used to "help tutors assess whether candidates have the skills and aptitudes needed to study …courses" including Economics, Psychology, Philosophy and Politics (depending on the institution).[126]

It is claimed by Cambridge Assessment, which administer the TSAs on behalf of these universities, that it "does not require a lot of extra study as it is a test of skills and aptitudes that students already possess" and "while a test-taker's performance at any test will improve with some familiarisation or practice, we would not advise anyone to pay for such help."[127] This disclaimer alludes to a widely-recognised problem: applicants who have access to additional forms of practice and support when preparing for these tests – either through their school / college or paid for by their family – will almost certainly use this to their advantage. When Cambridge introduced their additional written tests in 2016, Alan Milburn, former Labour minister and chair of the Social Mobility and Child Poverty Commission, said "it clearly has the potential to raise a further barrier to equal access [as] bright students from less advantaged backgrounds tend to miss out on the intensive tutoring their better-off peers receive."[128] Similarly, Sir Peter Lampl, chairman of the Sutton Trust, pointed out that "Cambridge should be aware that tests could present a disadvantage for low- and middle-income students as there is a thriving market in private tuition for the extra admissions tests used at Oxford and Cambridge." [129]

The UK is not the only country that struggles with the impact of admissions tests on disadvantaged applicants. The University of Chicago – one of the highest-ranked universities in the US – announced in 2018 it will no longer require its domestic undergraduate applicants to submit scores from the ACT or SAT (the two dominant tests for university entrance). As a result, the university admitted its most diverse ever class last year that contained more low-income, first-generation, veteran and rural students.[130] The number of HE institutions across America that do not require ACT and SAT scores has now passed 1,200 and continues to grow.

The movement towards 'test-optional' admissions is gaining momentum in the US. A study by the National Association for College Admission Counseling of 28 HE institutions with a total of more than 950,000 students found that "the adoption of a well-executed test-optional admission policy can lead to an increase in overall applications as well as an increase in the representation of [underrepresented] students (both numeric and proportionate) in the applicant pool and the freshman class."[131] Roughly two-thirds of the institutions included in their analysis had experienced growth in underrepresented students above that seen in a matched peer institution that still required entrance test scores. In addition, students who declined to submit ACT or SAT scores had slightly lower high school grades than students who did submit test scores but graduated at rates equivalent to, or marginally higher than, those who submitted them.

Critics have long contended that the SAT and ACT are culturally biased, with questions that discriminate against students from ethnic minorities who may lack 'cultural capital', while students who can afford a private tutor and take the test multiple times have an advantage over those who cannot. In December 2019, students, parents, public school districts and education advocacy groups sued the University of California, arguing that its admission requirement to submit an SAT or ACT score is "demonstrably discriminatory against the State's least privileged students, the very students who would most benefit from higher education."[132] The lawsuit drew heavily on research showing that low-income students and minority students tend to score worse than their wealthier, whiter peers "who more frequently hire tutors, take the test multiple times and are enrolled in school districts with the big budgets that accompany communities with high property values."[133] Partly in response to this lawsuit, the University of California announced in May this year that it plans to fully phase out use of the SAT and ACT by 2025, with one board member stating that "these tests are extremely flawed and very unfair. Enough is enough."[134]

Not only are applicants from more privileged backgrounds at a significant advantage when it comes to sitting (and succeeding in) university entrance tests, the same can be said for the use of interviews in the selection process of some universities. Applicants to Oxford and Cambridge who are fortunate enough to be invited for interview are usually interviewed at least twice, typically by two academics (admissions tutors). Although the tutors will no doubt work hard to take an applicant's background into account, there is no formal mechanism within the interview setting for this type of information to be incorporated. Previous research by Anna Zimdars at the University of Manchester has suggested that admissions tutors are susceptible to biases during interviews, as described by a tutor at the University of Oxford:

> *"…students who have come from educated backgrounds, who have been exposed more to,*
> *in breadth, literature or whatever have possibly a better chance of proving themselves more*
> *able for entry into a course where that's what they'll be doing. Not that this is necessarily*

a good indication of motivation, or indeed of ability but certainly of a certain kind of acculturation of training, yes for sure. And I think that's in a sense what is very difficult to assess in interviews, is to see through the training." [135]

The same research recorded some admissions tutors freely admitting that their own background could be a source of bias during the interviews, while several tutors also acknowledged that processes occurred whereby they related or 'clicked' intellectually more with some applicants than others. These findings led the author to suggest that "it is conceivable that this idea of personal, often unconscious, biases may hold further clues as to differential admissions rates" between demographic groups.[136] Earlier research had identified the same problem with using interviews to select candidates, often referred to as the 'similar-to-me' effect – meaning that "higher interview ratings are given towards interviewees who possess similar attitudes and demographics as the interviewer".[137] That is not to criticise the interviewers themselves, as they will presumably be trying to use the interview to identify the best candidate(s). Even so, the presence of these biases raises serious questions about the impact of university interviews on disadvantaged applicants.

There have been some efforts, albeit limited, to make the interview process less overwhelming for students from underrepresented backgrounds. For example, Oxford has published 'mock interviews' online alongside video diaries made by admissions tutors during the interview process, while Cambridge delivers 'interview workshops' through outreach programmes. However, these approaches run the risk of widening the participation gaps rather than closing them because applicants who have access to better information and guidance from teachers, careers advisors and family members are more likely to be made aware of these additional resources. Applicants from wealthier backgrounds can also invest in 'Oxbridge preparation programmes', through which students can receive support (sometimes over several weeks) with writing their personal statement as well as having the opportunity to "practise and develop your Oxbridge interview skills and receive advice on how to improve your performance" (in this case, at a cost of £3,750).[138] Such opportunities are self-evidently only available to a handful of fortunate individuals.

Research on the effect of entrance tests and interviews, either in the UK or US, is sparse. This means it is unclear from an empirical perspective how badly the prospects of disadvantaged applicants are being affected. Nevertheless, there is good reason to believe that entrance tests and interviews are distorting the admissions system in favour of applicants who receive the most educational and financial support, both before and during the application process. To illustrate the enormous gulf between the most and least advantaged schools in this country, a recent report found that top private schools were appointing full-time 'experts' to guide pupils through the university application process, including personal statements, entrance examinations and interviews. St Paul's School in London, one of the top-performing private

boys' school, has 11 such experts[139] - a level of investment that is simply unachievable across vast swathes of our school system. Such examples demonstrate why the continued use of tests and interviews as part of the university admissions system is manifestly unfair and inequitable. This imbalance cannot be endured within any new admissions model.

5. Recommendations

The analysis in this report has shown how the current UCAS system for university admissions is failing to deliver a fair, transparent and equitable process for prospective students:

- **Predicted grades:** research has consistently shown that a significant proportion (potentially the vast majority) of predicted grades are incorrect, and it is high-achieving students from the most disadvantaged backgrounds who are most likely to be under-predicted by teachers. Furthermore, the whole notion of an application process based on nothing more than guesswork from teachers in schools and colleges is plainly unfair on both staff and students and inevitably results in significant inequities when selecting, and applying for, universities.

- **Unconditional offers:** many universities are using unconditional offers to attract students and the tuition fee income they bring, despite overwhelming evidence that such offers can seriously harm the performance of these students in their A-level or equivalent examinations. Not only is the use of unconditional offers unfair on students and staff in schools and colleges, the lack of transparency during the application cycle in terms of the actual grades required to enter any given degree programme is unjustifiable.

- **Disadvantaged applicants:** despite tentative signs of progress at some universities in recent years, the proportion of disadvantaged students who reach the most selective universities is lamentable. The UCAS process is tilted against any such student who wishes to study at research-intensive universities, particularly through the use of personal statements, entrance exams and interviews as part of the application process. This inequitable system undermines the notion that all students have a fair chance of attending the university of their choice.

The recommendations in this report will therefore seek to address these issues by designing a new model for university admissions that:

- Removes the need for predicted grades as part of the application process

- Eliminates the use of unconditional offers, or any variant of them

- Explicitly prioritises the interests of the most disadvantaged applicants

As this report is focused on reforming the university application process rather than altering the wider education system, the new admissions model outlined in this chapter is designed

to fit within the existing timetables for school and college examinations in May / June and the start of the university term in October so that any disruption to students and staff is minimised. Consequently, the new admissions system will retain the current model of 'post qualification admissions' (where students apply before their exams and find out whether they have been admitted after their exams) rather than introducing post-qualification applications.

The following recommendations will describe the new admissions model in full, along with illustrative examples for how it could operate in practice. The intention is that this new model would be put in place for the 2022/23 academic year.

New roles and responsibilities for the Office for Students

RECOMMENDATION 1

The Office for Students should run a consultation process to select a 'Designated Admissions Body' (DAB) such as UCAS to operate the new admissions system for undergraduates.

The *Higher Education and Research Act 2017* (HERA) established the powers and functions of the OfS. Within their remit, the OfS was required to appoint two bodies to support their work: a 'Designated Quality Body' to carry out the OfS's quality and standards assessment functions set out in the HERA; and a 'Designated Data Body' to compile, make available and publish HE information.[140] The first step to introducing a fair and equitable admissions system is to amend the HERA to include a new 'Designated Admissions Body' along similar lines to the existing two bodies. Although the precise wording of the amendments to the HERA will require further discussions that are beyond the scope of this report, the suggested approach is as follows:

- The OfS will be given a new 'admissions function' that requires it to operate an admissions process that is fair, transparent and equitable for all applicants;

- The HERA should make provision for the OfS to appoint a 'Designated Admissions Body' (DAB) to perform this admissions function on its behalf;

- Following a consultation process, the OfS will be required to recommend the most appropriate body for overseeing a new admissions system;

- The OfS will give the DAB directions about how to perform its admissions functions to ensure that the new admissions system and its associated application cycle is delivered in an effective and timely manner.

Needless to say, UCAS would be an obvious candidate to become the new DAB given its experience in this field acquired over many years. That said, it is important to note that the DAB will be required to deliver the new admissions system described in this report, not deliver its own model. This deliberate rebalancing of the admissions process is a vital component of creating a fair, transparent and equitable system because it cannot be assumed that UCAS will choose to create and subsequently deliver an admissions process that is in the best interest of students, particularly those from the most disadvantaged backgrounds.

RECOMMENDATION 2

The Office for Students should introduce a new 'condition of registration' that applies to all HE providers. The new condition will specify that every provider must use the admissions system operated by the DAB.

'Conditions of registration' are the main tool that the OfS uses to regulate individual HE providers. These conditions set out the minimum requirements that providers must meet in order to be registered (and stay registered) with the OfS.[141] Only those providers that are registered with the OfS can access public grant funding for universities, loan finance for students and apply for degree awarding powers and the title of 'university'.[142]

There are two types of conditions of registration: 'initial and general ongoing conditions' (which all providers must satisfy at the initial time of registering, and then must continue to meet in order to stay registered) and 'specific ongoing conditions' that the OfS sets for individual providers (e.g. any actions required to be financially sustainable or improve their access and participation rates). One of the most important initial and general ongoing conditions is *Condition A: Access and participation for students from all backgrounds*, which has two elements:

- ***Condition A1****: An Approved provider intending to charge fees above the basic amount to qualifying persons on qualifying courses must (i) have in force an access and participation plan approved by the OfS in accordance with the Higher Education and Research Act 2017 (HERA); and (ii) take all reasonable steps to comply with the provisions of the plan.*

- ***Condition A2****: An Approved provider …charging fees up to the basic amount to qualifying persons on qualifying courses must: (i) publish an access and participation statement; and (ii) update and re-publish this statement on an annual basis.* [143]

We recommend that a third condition – A3 – is added to the conditions of registration used by the OfS. This condition will state that '*For the purposes of the designated admissions body (DAB)'s duties as specified in the HERA, an Approved provider must adhere to the admissions system overseen by the DAB in a manner and form specified by the DAB.*'

In the absence of this new condition of registration, some universities may attempt to remove themselves from the new admissions system described in this report and operate independently of all other universities. This would undermine the operation of the new system by allowing the universities in question to continue acting out of self-interest which, as this report has amply demonstrated, will continue to generate unfair, opaque and inequitable outcomes for students, teachers and other stakeholders.

More transparency for applicants

RECOMMENDATION 3
At the beginning of the new application cycle, universities will be required to publish a 'standard qualification requirement' (SQR) for each undergraduate degree. Once published, the SQR cannot be altered by universities at any point in the application cycle, and no student can be accepted onto a degree if they fail to meet the SQR.

When universities publish their 'entry requirements' for applicants to use when deciding which courses to apply for, one might reasonably assume that these grades are indeed a minimum requirement for all those who wish to start any given degree. After all, students starting a degree for which they are academically ill-equipped is surely in no-one's interest, yet it is abundantly clear that some universities are now showing little interest in using entry requirements to signify the academic demands of each degree.

The exponential growth in unconditional offers is a perfect illustration of how, despite entry requirements being published well in advance of the start of each academic year, universities feel perfectly entitled to ignore their own requirements if it suits their needs. This undermines any attempt to create a transparent application system because students simply have no idea what grades will actually be required from them on or after results day to be accepted onto a degree course. In many respects, the use of 'unconditional offers' and other similar moves by universities to lower or even abandon their entry requirements later in the application cycle creates a fundamental dishonesty at the heart of the current UCAS process. This is unfair on students, parents and teachers – and it must change.

As discussed earlier in this report, Scotland is on the verge of rolling out a novel system in the form of 'minimum entry requirements' for each course, which are intended to signify the standard that applicants must reach to be admitted. This report builds on this initiative by formalising it for all universities in England. It is proposed that, at the start of each application cycle in May, every university publishes its 'standard qualification requirement' (SQR) for each undergraduate course. Once this SQR has been published, universities will be banned from accepting any student who does not reach the SQR in their final school or college exams. This approach will eradicate unconditional offers because universities will no longer be able to lower or ignore their own qualification requirements. Moreover, the application cycle will be truly transparent because every student will be able to see the SQR for each degree throughout the application process, knowing that it represents the standard they must reach if they wish to be accepted onto the course.

To deliver this proposal, the HERA will need to be amended. At present, it asserts that the Secretary of State may not issue the OfS with any guidance related to "the criteria for the admission of students, or how they are applied." To align the HERA with the introduction of the new SQRs, it is suggested that the HERA should instead read as follows:

> *"The guidance may, in particular, be framed by reference to particular courses of study but, whether or not the guidance is framed in that way, it must not relate to—*
> *[…]*
> *(e) the standard qualification requirements for the admission of students onto each course of study"*

This will protect the autonomy of universities to set the SQR at whatever level they wish for every degree course while also ensuring that universities cannot manipulate or jettison their own entry requirements after they are published. This will therefore be a significant step towards a fair, transparent and equitable admissions system.

RECOMMENDATION 4

Alongside the publication by universities of their SQR for each undergraduate degree, they must also state the maximum number of students they can accept onto each degree course without compromising the quality of education they provide.

Now that students can see the SQR for each degree programme, another important element of a transparent application system will be the visibility over how competitive each course is likely to be. Under the current system, UCAS does not say how many places are available on each course during the application cycle because HE institutions do not provide this information. This makes it virtually impossible for students to gauge the likelihood of their

application being successful in terms of the relative popularity of a degree. The 'student:staff' ratios that some university league tables provide are of little value for an individual student applying for a specific course because the ratios are retrospective and do not give a sense of how large or small any course is likely to be in the following academic year.

In May this year, the government announced details of a 'support package' for the HE sector, which saw the reintroduction of student number controls in England for the first time since 2013. Under the plans, English universities will be able to recruit full-time undergraduate UK and EU students for the next academic year up to a "temporary set level" (their forecasts for the next academic year plus an additional 5 per cent).[144] Although the principle of number controls is sensible, this report proposes that, rather than the government setting the maximum number of students, universities should be able to set their own limits.

Consequently, alongside the SQR for each degree, universities will have to publish the maximum number of places that are available to students and send this information to the new DAB. This will be achieved by asking universities to specify the maximum number of students that they can admit onto a course without reducing the quality of the education they will provide. For example, some degree courses may only accept a handful of students each year because it is a highly-specialised or technical course that requires intensive supervision, whereas other degree courses may operate with over a hundred students who are generally taught in large lecture halls. Either way, it will be up to universities to decide how they set their maximum course sizes – thus protecting another element of university autonomy.

RECOMMENDATION 5

Following the publication of the SQR for every degree, a new national contextual offer (NCO) will be applied to the SQRs at all universities. The NCO will automatically reduce the grades required by applicants facing the greatest level of disadvantage, including care leavers, those living in deprived areas and students who attend a low-performing secondary school or college. The NCO will therefore create an 'adjusted qualification requirement' (AQR) for applicants who are deemed to be disadvantaged in some way.

The use of contextual offers has resulted in a fragmented and confusing landscape for applicants. Not all universities use contextual offers, and those that do use them often do not list all the factors they consider. Even if a university does list the contextual factors that it uses, it rarely states the weighting given to each factor within their internal processes for making offers. Ultimately, this creates a situation where some university departments are willing to consider the background of an applicant, whereas other departments – even within the same university – might show little or no interest in doing so. If the goal is creating a fair, transparent and equitable admissions system, these discrepancies must be eliminated.

As with the promotion of 'minimum entry requirements', Universities Scotland have taken the lead in the area of contextual admissions. In future, all Scottish universities will "use a consistent core of indicators for their contextualised admissions [as] this change will help potential students know, well ahead of applying, whether their application could receive additional consideration."[145] The first two indicators in the 'core' list are the Scottish Index of Multiple Deprivation (SIMD) and whether an applicant has been in care, with work still on-going to determine if there are other indicators that can be added to this list. By formalising the inclusion of these factors when making contextual offers, it makes the application system more transparent as well as helping to create a level playing field for those students who have faced the greatest barriers to their educational success.

This report recommends that a 'national contextual offer' (NCO) should apply to all degrees at all English universities. Once universities have set the SQR for each course, the new NCO will automatically reduce the grades required by students who meet certain eligibility criteria, and the students who have faced multiple barriers in the past will see the largest reduction in grades. The NCO will be based on similar principles to the upcoming National Funding Formula for schools in England. This is built around the idea that a school should receive a 'base' amount of funding per pupil, but the school also receives extra funding for any pupil who has 'additional needs'. These 'additional needs' for pupils are defined as:

- **Being in receipt of Free School Meals** (FSM) due to low parental income

- **Living in a deprived area** based on the IDACI score of a pupils' home postcode to provide a measure of socio-economic deprivation (the IDACI score is represented on a scale of 0 to 1, with 0 being the lowest deprivation and 1 being the highest)

- **Low prior attainment**, so that schools receive funding for all pupils who did not reach the expected level of attainment in their previous phase of education

- **Having English as an additional language**

These four factors are additive, meaning that a school can receive any of these payments (or all of them) for each eligible pupil. This report will take the same approach in terms of a 'base' grade offer for all applicants (the SQR) with additional grade reductions for each barrier that a student faces, with the most significant barriers leading to the largest reduction in grades.

Purely for illustrative purposes, the example in Table 1 (overleaf) shows how the new NCO could operate. It displays three eligibility factors that might be included in the NCO in the form of a 'points' system, whereby each factor is associated with a set number of points and applicants are assigned points for each and every eligibility factor that they meet. This will, in turn, create a total 'points score' for each applicant.

Table 1: an illustration of how the new points-based 'national contextual offer' could operate with different eligibility factors

NUMBER OF POINTS AWARDED TO EACH FACTOR	WHETHER AN APPLICANT HAS EXPERIENCED CARE	IDACI SCORE OF APPLICANT'S HOME POSTCODE *(0 = LEAST DEPRIVED; 1 = MOST DEPRIVED)*	NATIONAL RANK OF THE EXAM RESULTS OF AN APPLICANT'S SCHOOL OR COLLEGE
4 points	Yes	0.5-1 (3% of pupils in England[146])	First quintile *(bottom 20% of attainment in the country)*
3 points		0.4-0.5 (8% of pupils in England)	Second quintile
2 points		0.3-0.4 (15% of pupils in England)	Third quintile
1 point		0.2-0.3 (19% of pupils in England)	Fourth quintile
0 points	No	Less than 0.2 (55% of pupils in England)	Fifth quartile

The following theoretical students would be awarded points as follows:

- **Student A:** they live in a moderately deprived area with an IDACI score of 0.35 (2 points) and attended a college that achieves reasonably well in national examinations, placing it in the fourth quintile of performance (1 point).

    TOTAL – 3 points

- **Student B:** this student was previously in local authority care (4 points) and lived in a deprived area with an IDACI score of 0.42 (3 points), although the school they attended was ranked in the third quintile for their examination performance (2 points).

    TOTAL – 9 points

- **Student C**: this student lives in one of the least deprived areas of the country with an IDACI score of 0.11 (0 points) and they attended one of the highest performing schools in the country (0 points).

    TOTAL – 0 points

Once a student's background characteristics have been used to calculate the total points for their application, the NCO will automatically adjust the SQR for all the degree courses that an applicant selects based the rubric such as the example shown in Table 2.

Table 2: an illustration of how a 'national contextual offer' points score could create an 'adjusted qualification requirement' (AQR) for each degree

NUMBER OF POINTS ASSIGNED TO THE APPLICANT THROUGH THE NCO	NUMBER OF GRADES THAT THE SQR WILL BE REDUCED BY FOR THE APPLICANT	EXAMPLE OF THE APPLICANT'S GRADE OFFER FOR A DEGREE WITH AN SQR OF THREE A's
0 – 2 points	0	AAA
3 – 5 points	1	AAB
6 – 8 points	2	ABB
9 – 12 points	3	BBB

Using the same three theoretical students cited above who are applying for a degree with an SQR of three A's, Student A (3 points) would be required to get AAB, Student B (9 points) would be required to get BBB and Student C (0 points) would be required to get straight A's.

The end result is that the students who have faced the greatest barriers to their prior success will automatically be given the lowest offers by universities. The national contextual offer will thus create an 'adjusted qualification requirement' (AQR) for every degree based on an applicant's personal characteristics. The number of grades that the SQR is reduced by for each applicant applies to all the degrees they apply for, even if those degrees have different SQRs. This will ensure that, irrespective of the subject or discipline chosen by an applicant, they will have complete certainty over the grades they must reach - both in terms of the SQR published by the university and any grade adjustments they are entitled to courtesy of the new NCO.

A fairer and more equitable way to allocate university places

RECOMMENDATION 6
'Personal statements', references and entrance tests will be removed from the application process because they bias the whole admissions system against the most disadvantaged applicants.

The new 'Designated Admissions Body' (DAB) will process the applications for all students applying to UK universities, much as UCAS does now. As noted earlier in the recommendations section, the role of the DAB is to implement the government's new admissions process under the supervision of the OfS. With universities having published their SQR for each university degree and with the new national contextual offer in place, it is now time for applicants to make their choices about which institutions they want to attend and which course(s) they would like to study.

The analysis in previous chapters outlined a wide range of components of the current application system that reduce the chance of a student from a disadvantaged background attending the most selective universities. For example, the requirement for personal statements and references on UCAS application forms tilts the application process in favour of applicants from more privileged backgrounds who attend schools with better resources and connections (in both the state and private sector). In addition, entrance tests will always give an advantage to applicants who can afford private tuition or who attend schools that can provide additional support and preparation. If the goal is to create a fair and equitable admissions system, these features of the existing application cycle can no longer be endured because they systematically bias the whole process against those individuals who have faced the greatest obstacles to their educational success thus far.

RECOMMENDATION 7

Predicted grades will no longer feature in the application process. Instead, applicants will be free to select any 10 university degrees and rank them in order of preference.

The research evidence on the accuracy of predicted grades has removed any doubt about how inappropriate it is to use them as a basis for the university admissions system. The new admissions system overseen by the DAB will therefore take a different approach. The AQRs will now provide full transparency for students, parents, teachers and careers advisers about the grades that applicants need to achieve for any degree course. One of the requirements placed on the new DAB will be that their website includes a simple feature allowing any applicant to enter their personal characteristics that relate to the new national contextual offer (e.g. whether they were in care, what school / college they are attending) so that they can see in advance the AQR for every degree they are interested in.

As they do now, applicants will have several months to discuss their current level of performance with their teachers, careers advisers and family members to help guide their decisions about which university and which degree will be most suitable for them. Universities will continue offering 'open days' to showcase their courses, facilities, accommodation and much more besides, which applicants can also use to inform their choices. The main difference will come at the end of these deliberations because there will no longer be any role for predicted grades in the application process.

At present, students typically choose five courses on the UCAS application form. Under this new admissions system, they will instead select 10 courses from any university and enter them into their online application form managed by the DAB (to be submitted in January of each application cycle, as under the current system). The online portal that the DAB creates for

applicants will inform them that, although they can choose any degree course that they wish to attend, their 10 choices should include a mixture of degrees with SQRs that:

- Are **above** their current level of performance
- **Match** their current level of performance
- Are **below** their current level of performance

Ultimately, it will be up to the individual applicant to select the degree courses and universities that they believe are most suitable for them. This proposal shares some similarities with the admissions system used in Ireland, where applicants can select up to 10 Bachelor's (Honours) Degrees and are instructed to list the courses "based on your genuine order of preference."[147]

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RECOMMENDATION 8

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On results day, university places will be automatically allocated based on students' lists of preferred courses. For courses that are oversubscribed, places will be allocated by lottery among all the applicants who reach or surpass the SQR (or AQR, where applicable). For courses that are undersubscribed, all students who reach or surpass their SQR (or AQR) will be admitted.

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The admissions cycle is now almost complete by this stage. Applicants have considered all their options in full knowledge of the SQR for each course and any adjustments they receive through the NCO. Teachers, careers advisors and family members will have offered their advice and suggestions, and applicants will have been on numerous open days to help decide the institutions and courses that are right for them. After considering their options, all applicants have selected 10 courses at a range of institutions and subsequently ranked them in order of preference. On results day, it is time for the new DAB to allocate places to applicants in a manner that is fair, equitable and transparent based on the course preferences that applicants have submitted.

STEP 1

As stated in Recommendation 4, HE institutions have already informed the DAB of the maximum number of places they can provide for each course. The DAB also knows how many applicants have listed each course as their first preference. Consequently, the first step for allocating students to courses is for the DAB to rank all the degree courses available at all HE institutions by their level of oversubscription. This will create a list of all the available degree courses from the most oversubscribed to the least oversubscribed.

STEP 2

Starting with the most oversubscribed course, all the applicants who listed the course as their first preference and have reached or surpassed their AQR will be entered into a lottery. This lottery will allocate places to applicants purely by chance, up to the maximum number of places available for that degree course. All the successful applicants will be offered a place on that course starting in October that year.

STEP 3

Having started with the single most oversubscribed course, the DAB will start with the next most oversubscribed course and eventually work down the whole list of oversubscribed courses. On each occasion, the DAB will allocate places by using lotteries that include any applicant who has chosen a course as their first preference and has reached or surpassed their AQR. Should an applicant not be offered a place for their first preference, they will automatically be entered into the lottery for their next highest preference if they have reached or surpassed their AQR.

This process will continue based on the order of each applicant's 10 preferences until they receive an offer of a place. For example, any applicant who missed out on their second preference course in a previous lottery will subsequently be entered for the lottery to attend their third preference course and institution if they have reached their AQR. Again, this is similar to the system in Ireland whereby "at the offer stage, you will receive an offer of the course highest up on your course choices list(s) that you are deemed eligible for, if any."[148]

STEP 4

Once the DAB has allocated places by lottery to all the oversubscribed courses, they will eventually reach a course that has fewer applicants than available places. At this point, all the remaining applicants who have reached or surpassed their AQR and have listed the course as their highest remaining preference will be offered a place on the course by default. This will continue until all applicants have either been offered a place on one of their 10 preferred courses or their list of preferences has been exhausted.

Does an applicant have to accept the course they are offered?

As applicants have listed their 10 chosen courses in order of preference, they should be willing to accept the highest placed offer that they are made. If they choose not to accept an offer, they will be entered into the 'clearing' phase of university recruitment (see next section).

What if an applicant does not get any offers from their 10 preferred courses?

Given the chance-based nature of this new application system, plus the fact that universities can decide how many students they wish to admit each year, it is possible (although unlikely)

that an applicant may not be admitted onto any of their preferred courses. If each applicant follows the suggestion of including a range of courses that are both above and below their current level of performance within their list of preferred courses, the risk of not getting any offers will again be significantly reduced. That said, if an applicant does not get any offers then they will be able to choose a course through 'clearing' instead.

How will 'clearing' work in future?

Any applicant who was not awarded a place from their list of 10 preferred courses, or who rejected an offer that they received, will be able to choose another course during 'clearing'. As happens now, HE institutions will be able to use this process to fill any remaining places they have on their courses after the initial allocation of places (steps 1-4).

Following the completion of the automatic allocation of places by lottery for oversubscribed courses, the DAB will immediately be able to identify those courses that still have places available seeing as universities will already have informed the DAB of the maximum number of students they can accept. As happens now, students will be allowed to apply to any HE institution that has vacancies on a particular course. However, under this new admissions model, the SQR is a formal requirement for all applicants. This means that an HE institution will be banned from accepting any student who has not met their AQR for a specific degree, even through the clearing process. The logic remains the same as before: if an applicant has not met a university's minimum requirements for demonstrating their potential to succeed on a course, there are no grounds for them to be admitted either before or during the clearing process.

6. Areas for further consideration

Careers advice

A recent report from a Parliamentary Select Committee concluded that "careers education, information, advice and guidance is inadequate in too many English schools", which means that "too many young people are leaving education without having had the chance fully to consider their future options".[149] The same report lamented the fact that "recent years have seen a whole host of policy changes, initiatives and new bodies: none has led to any serious improvement in provision; some have proved counter-productive."[150] Although a full examination of the reasons behind the poor quality of careers advice and guidance in schools is beyond the scope of this report, the opaqueness of the university application process is unlikely to help matters. The rapid growth in unconditional offers plus the variable usage and implementation of contextual admissions makes the whole UCAS landscape much harder for applicants to understand, particularly those who attend schools and colleges with fewer resources and connections and/or those cannot draw on support from family members.

The asymmetric availability of information could potentially be affecting applicants' decisions. A study published last year by academics at the Institute of Education analysed whether students were attending courses that are less or more selective than might be expected given their prior academic attainment. They found that 15 per cent students were 'under-matched' (they attend universities that are *less* selective than might be expected) and another 15 per cent were 'over-matched' (they attend universities that are *more* selective than might be expected).[151] When considering future earnings, this mismatch rose to 23 per cent in both directions. Furthermore, there were "substantial socio-economic status (SES) and gender gaps in mismatch, with low SES students and women attending lower quality courses than their attainment might otherwise suggest."[152] The researchers noted that "students who are on the path towards university, and who have undertaken some research, or have useful networks of people offering advice and guidance, are more likely to find a good match."[153]

The push for greater transparency across the whole admissions cycle, namely through the introduction of SQRs as well as the NCO that applies to all applicants and all courses, is likely to significantly improve the availability and accessibility of information for prospective students, parents, careers advisors and teachers. This should create a more level playing field between different schools and colleges because the relevant information will always be visible in the same format to those who need to use it. This will not solve all the issues with careers advice and guidance in relation to HE institutions and degree courses. Nevertheless, it will break down some of the information barriers that exist in the current UCAS process.

Applicants who have examination papers remarked

In this new admissions model, universities decide how many students they can accept onto each degree course, and on results day the DAB will allocate all the available places on each course to applicants based on their list of preferences. However, some applicants may have their examination paper(s) remarked in the days after they receive their official results. This could lead to situations where a student missed their AQR for a given course, meaning that they miss out on being entered into the lottery for a specific course, only to then receive a higher grade following a remark.

One option for dealing with this scenario would be to use a form of secondary place allocation. For example, the DAB knows the ratio of 'students admitted' to 'maximum available places' for every degree course, so they could run a secondary lottery for students who only meet their AQR after a remark. For example, if 100 students who met their AQR were admitted onto a course out of 1000 applicants before any remarks took place, the DAB knows there was a 10 per cent chance of an applicant being admitted if they had listed the course as their first preference and also met their AQR. It could therefore conduct a secondary lottery for students after their remark based on the 10 per cent 'success rate'. This would essentially be a single event that produces a random number between 1 and 100, and if the number chosen is between 1 and 10 (to reflect the 10 per cent success rate of other applicants) then the university will be allowed to admit them onto the course.

If the student is not successful in the secondary lottery for their first preference course, they will be entered into a secondary lottery for their second preference based on the same principles, and so on. To ensure there are sufficient places available on each course for students whose grades improve after a remark, it might be useful for universities to be instructed that it is necessary to have a small level of 'tolerance' in the maximum number of applicants they state that they are able and willing to admit onto each course. The clearing process will still operate as described in the previous chapter for any applicant who is not offered a place on any of their preferred courses or who rejects an offer of a place.

'Special consideration' for personal circumstances

Some HE applicants may, through no fault of their own, be exposed to a set of circumstances at the time of their examinations at age 18 that affect their performance and may cause them to miss their AQR. One of the fundamental features of the new admissions model in this report is that universities will lose their ability to change a course's grade requirements for individual students, but it is still necessary to ensure there are mechanisms in place to account for instances where the particular circumstances of an applicant should be considered.

The Joint Council for Qualifications, who represent the major examination boards for schools and colleges, produce guidance on their approach to 'special consideration' – defined as "a post-examination adjustment to a candidate's mark or grade to reflect temporary illness, temporary injury or some other event outside of the candidate's control at the time of the assessment, which has had, or is reasonably likely to have had, a material effect on a candidate's ability to take an assessment or demonstrate his or her normal level of attainment".[154] Students are eligible for 'special consideration' if they have covered the whole course but their performance in the final examination (or in the production of coursework) is "materially affected by adverse circumstances beyond their control" at the time of the assessment. These circumstances include, among others, accidents and injuries, bereavement of a close family member or a domestic crisis.[155] If a student is still able to attend their examination, their raw mark can be adjusted by up to 5 per cent of the total marks available. If the student is not able to attend their examination, their final grade may be adjusted to reflect their circumstances if they have already completed enough of the course.[156]

As a starting point, it would be sensible to use these existing rules if an HE applicant experiences an adverse event. The online application system currently used by schools and colleges for 'special consideration' gives an instant decision in the majority of cases. This should mean that any subsequent adjustments to a student's examination marks will be factored into the new admissions system, meaning that a student who misses their AQR for one of their preferred courses due to adverse circumstances should not be unduly penalised.

Changes to Oxford and Cambridge admissions

The new admissions model in this report will lead to three significant changes to how Oxford and Cambridge admit students. First, the removal of interviews and entrance examinations will mean there is no need for an 'early entry' deadline for Oxbridge that forces candidates to apply by October instead of January (the latter being the deadline for almost every other university). Second, applicants can now apply to both Oxford and Cambridge in the same admissions round, whereas at present an applicant must choose between *either* Oxford *or* Cambridge. No justification has ever been provided for this exclusivity within the application process, although it is often assumed to be a measure to cut down the number of applications that these two prestigious institutions receive. Third, students will apply to Oxford or Cambridge universities as a whole – not individual 'colleges' within the universities.

Given this report's commitment to creating a fair, transparent and equitable admissions system in which all students make their choices on a level playing field, the 'early entry' and Oxbridge exclusivity arrangements cannot be allowed continue. On that basis, this new

admissions model deliberately ignores the current exceptions afforded to these two institutions as well as the unhelpful complexity created for applicants by having to apply to specific colleges within the universities instead of having a single point of application.

Subjects that require interviews, auditions or portfolios

The new admissions system will no longer use personal statements, interviews and entrance tests because it relies solely on an applicant's examination performance (coupled with the NCO). This may pose a challenge for subjects that need to engage in some form of face-to-face interaction with applicants before decisions can be made about whether to offer them a place.

Medicine, Dentistry and Veterinary Science
These popular subjects typically use admissions tests and interviews to judge applicants. The problem is that it is precisely these filtering tools that tilt the application system towards applicants with the best connections and resources (either through their family or school). These degree courses have an important role to play in ensuring that future practitioners have the right skills and aptitudes to perform their role effectively (e.g. interpersonal skills with patients). It might therefore be worth considering various compromises that could promote fairer access to students from disadvantaged backgrounds without undermining the need to identify appropriate candidates. Possible alternatives to the current system include:

- The selection process for choosing which candidates to interview for each subject could be random and carried out on a 'blind' basis i.e. universities would choose which students to interview by lottery, and they would not know the prior academic results of any applicant.

- Universities could select candidates for interview based on their GCSE scores with adjustments similar to the new NCO in this report (e.g. care leavers and applicants from the most disadvantaged backgrounds would have their GCSE point scores automatically increased by a pre-determined margin). Universities would only see an applicant's adjusted GCSE point scores, not their original scores.

- Entrance tests such as the BioMedical Admissions Test could be reformed so that the results are weighted by the applicant's level of disadvantage in a similar manner to the new NCO (e.g. care leavers and applicants from the most disadvantaged backgrounds would have their test scores automatically increased by a set margin).

Further consultation would be required with professional bodies to identify which option would be most suitable in terms of promoting fairness, transparency and equity relative to the current system. It is vital that the government does not make blanket exemptions for these

subjects when building a new admissions system, even if professional bodies oppose reform, because existing schemes have already shown that allowing students with lower grades onto these sought-after degrees can widen access without compromising the programme. For example, King's College London's 'extended medical programme' offers students greater support and spreads the first year of the standard medical degree over two years. A review of the programme concluded that, with additional support, students admitted with A-level grades of just CCC could thrive on medical degrees.[157]

Performing Art subjects

Performing arts such as music, dance and drama typically involve an audition at an HE institution or conservatoire to demonstrate an applicant's ability, whereas art-based subjects often require the production of a portfolio of previous work to accompany a prospective student's application. Given the vital role that these auditions, interviews and portfolios play in the admissions process for these courses, this new admissions model will continue to allow their usage in a limited number of subjects.

However, it would be wrong to allow conservatoires and other institutions to ignore the barriers faced by some applicants. Of the Royal College of Music's intake of 25 students in 2018, 39.7 per cent were from state schools against a target of 89.6. For the Royal Academy of Music's intake of 30 students in the same year, the state school proportion was 41.8 compared with a benchmark of 89.7.[158] These figures suggest that reforms are sorely needed to improve the outlook for young people from more disadvantaged backgrounds. For example, performing arts subjects often set out requirements in terms of A-level grades or UCAS tariff points in addition to the performance-based element of each application, so it may be necessary to use the NCO to adjust these entry requirements on a national basis.

Mature students

This report has focused on redesigning the admissions model for school leavers entering HE for the first time. This raises the question of how much of the new admissions system should be applied to older applicants – some of whom may have left full-time education years, if not decades, ago. The profile of mature applicants is very different from school leavers, with some older learners possessing few formal qualifications (or even none at all). The DfE should therefore consult widely with policy experts as well as university and college leaders when deciding how the new admissions model should be utilised for mature applicants in future. For example, one option would be to use this new model for all applicants under the age of 21 and then operate a separate admissions protocol for older learners. Because this new admissions system will only become operational in 2022, there is plenty of time available to consider this matter in more detail.

International students

At present, some universities rely on UCAS for administering applications from international students, but this is not a formal requirement and other universities choose to work directly with applicants from abroad. This raises the question of whether this new admissions model and the potential appointment of UCAS as the new DAB should also encompass international applicants. After all, one of the significant risks flagged in the recommendations section is that universities may attempt to extract themselves from the new admissions model to evade the obligations it places on them, which is why incorporating the use of this new admissions model into the OfS's conditions of registration is the best approach. Even so, further deliberations would be needed to determine whether this condition of registration should apply to all applicants – UK and international – or just applicants based in this country.

Transparency for financial support

Transparency has been a major theme of this report in response to the opaque system that exists at present. Another potential strand of transparency that could benefit applicants relates to the financial support available at each institution such as bursaries and scholarships. In this new admissions model, universities are required to publish their SQR for every course so that applicants can see what is required in terms of entry grades (before any adjustments are made by the NCO). It may therefore be beneficial to require universities to publish full details of any available financial support alongside the SQR. A similar proposal was put forward by the Social Mobility Commission last year, who recommended that there should be "a system which displays all financial support (bursaries, scholarships and ad hoc funds) available to undergraduates alongside their eligibility criteria …in a simple, centrally accessible, user-friendly and digitally-smart format". Their hope was that this would "allow current and prospective students, and their parents, to be informed of all forms of financial support during the process of researching courses and making applications".[159]

Under the new admissions system in this report, such a proposal would mean that universities would be unable to calculate in advance their expenditure on bursaries and scholarships because they would not know who their successful applicants are each year until the lotteries had been run. Even so, promoting complete transparency over any available financial support will give students, parents and teachers better information with which to make more informed decisions about which institutions and courses may be the most appropriate option.

Conclusion

"Exposing the people involved in the admissions scandal has given the public a sense of how readily the system can be manipulated by wealth. But the reality is that justice won't be served simply by holding some headline-making families accountable. That will only happen once the larger, deeply rooted institutional barriers to higher education are acknowledged and removed so that students, regardless of the status and wealth of their parents, have truly equitable opportunities for admission into the university of their choice. Dismantling these systemic barriers will require universities and the rest of the education system to work to end the inequities they create and promote -- ones that don't usually make global headlines." [160]

The 'Varsity Blues' scandal, where wealthy families across the world were caught paying large sums of money to get their children admitted into selective American universities, is one of the most shocking education sagas in years. The quote above is taken from a letter written by student representatives from Yale, Stanford, UCLA and USC to the *Los Angeles Times* in August 2019, in which they accepted that "we would not be where we are today without certain opportunities provided to us that other students could not afford." On that basis, the aim of their letter was to ensure that enough attention is paid to the 'real scandal', namely that "millions of kids …will never have an equitable chance in an extremely complex, competitive and costly process."[161]

America is not the only country to suffer a major admissions scandal in recent months. Last year, South Korea's Justice Minister was forced to resign just 35 days after he was appointed.[162] His wife, a university professor, is standing trial on charges of fabricating certificates relating to an internship which may have assisted in their daughter's admission to medical school. In response, President Moon Jae-in acknowledged that "more people are feeling hopeless, believing that education has become a means to inherit one's parents' socio-economic status" and declared that "re-establishing public trust through a fair education system is the most important education task at this time [and] this should start with university admissions."[163]

Mercifully, the UK has not witnessed scandals of a similar magnitude. Nevertheless, this report has explained why the sense of dismay and injustice that is generated by our current university admissions system is entirely warranted. Although the scandals in America and South Korea are certainly not identical, the common thread is clear enough: allowing wealth and privilege to unduly influence who gets accepted into university degree courses, particularly at the most prestigious institutions, inevitably results in an overwhelming sense

of unfairness as well as risking a catastrophic loss of trust - not just in the admissions process, but in the education system as a whole. In both countries, it will surely take years to rebuild this trust, although one may question whether it is ever possible to fully recover from such a seismic event. If this country is to avoid the same loss of trust experienced elsewhere, maintaining the status quo - or even close variants of the status quo - is not an option.

The introduction to this report began by quoting the Robbins Report from 1963, which asserted that "it is essential that the arrangements for the selection of students should not only be fair, but also that they should be seen to be fair."[164] Similarly, the Schwartz Review in 2004 said "it is vital that all stakeholders in the admissions process …believe the system is fair".[165] More recently, the Conservative Party election manifesto set the goal of having an admissions system that is "underpinned by a commitment to fairness …and access",[166] while the OfS has stated its desire to see a system that is "fair, transparent and inclusive".[167] As this report has repeatedly demonstrated, the existing admissions system cannot plausibly claim to be fair or transparent, especially for those applicants who face the greatest barriers to accessing HE.

The reduction in autonomy over admissions proposed by the OfS in response to the outbreak of COVID-19 is intended to prevent universities from undermining students' interests and threatening the stability of the HE sector during the crisis, yet the protection of students and maintaining the stability of the sector should surely be permanent features of our admissions system rather than temporary measures. A fundamental change is therefore needed in the way that universities can attract and select applicants because the current system is serving the interests of universities, not students or the sector as a whole. This change in approach should not be taken lightly, especially as so many aspects of the admissions system such as predicted grades have been in place for many years. Nevertheless, the evidence presented in this report leaves little doubt that a reduction in university autonomy is a prerequisite to achieving the goal of an admissions system that ensures every university and every degree is within reach of every student, regardless of their background or circumstances. Should this goal be reached, we will finally be able to state with confidence that this country has a university admissions system built on fairness, transparency and equity.

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