

5th January 2012

Ms Mary Curnock Cook OBE
Chief Executive
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Dear Mary,

Thank you for giving us the opportunity to put forward views in the UCAS Admissions Process Review. This response is made on behalf of the 93 sixth form colleges represented by the SFCF and has been compiled by David Adelman, Principal at Godalming College who is our representative on the UCAS Board. This letter is a proxy for the 'Further Comments' sections and highlights the most important points as far as we are concerned.

2014 Year of Entry Enhancements

We support all the proposals for improving the current approach starting with the 2014 year of entry. We particularly support the three phase approach and redefinition of clearing. We think the gathered field approach is the right one but would bring the firm offer and firm reply deadlines forward from mid-end April if that is possible. In relation to the insurance choice we would enforce correct use of the insurance process. But some of our members think there is an argument to reduce the maximum number of course applications from 5 to 3. Given that there would be no advantage to applying before the equal consideration deadline, students will have time to narrow down their choices to a maximum of three rather than applying to five universities on what might be a speculative basis. This should concentrate the minds of applicants in terms of making realistic and properly thought through applications based on their academic potential, it will help reduce bureaucracy, it will underpin a decision to 'enforce' the correct use of the insurance choice.

Post-results system of application in general

We support PSA in theory because it would make the application system more transparent and efficient for applicants and HEIs than the current system. At the same time we are reasonably content with the current system which with the enhancements suggested for 2014 onwards could continue to provide a perfectly satisfactory applications system.

We are not convinced at all that PSA will widen participation in HE from disadvantaged groups of students. The evidence that the current system is loaded against working class students is weak and it may be irrelevant given the likely impact that the abolition of EMA, the rise in university fees, and the government's support for a more traditional curriculum will have on working class students' attitudes and aspirations towards HE.

We also wish to challenge a limited concept of fairness which assumes that the student application process is about getting the students with the best A level grades into the most prestigious universities. The HEI application process should be about getting all qualified students onto degree courses which suit their need, interests and aspirations at universities which suit them in terms of environment, location, and (these days) cost. The constant emphasis on getting to 'good' universities reinforces the idea that we have a hierarchy of first rate 'selecting' universities compared to second rate 'recruiting' universities. As this idea gains currency the experience of those who study at 'second rate' recruiting universities is increasingly devalued – and of course poorer working class students are disproportionately represented in recruiting universities.

Loss of three weeks teaching

We think introducing PSA at the expense of three weeks of teaching time is unacceptable and would be a retrograde step. Cutting three weeks teaching time will reduce the quality of education, lower A level grades and/or force schools and colleges to teach to the exam to an even greater extent than happens already. This is not a price worth paying for PSA.

Teaching time in 16-19 is already being cut in schools and colleges and set sizes are rising because of funding cuts. Many Sixth form Colleges are in the process of reducing teaching time (typically from 4.5 to 5 hours per A level per week to around 4 to 4.5 hours per A level per week on average.) These changes will in total result in a loss of overall teaching time of about four weeks. Taking out another three weeks of teaching time in three or four years time is not something Colleges can afford to do without endangering the quality of education and performance.

If HEIs and their UCAS organisation wish to introduce PSA then the obvious solution is for the HE year to begin in January.

Managing and Supporting Student Applications July and August

We are not convinced that 10 days in the first two weeks of July is long enough to support students in making applications to two universities based on their results. The decision to rule out a pre-registration period or PQO will put a great deal of pressure on schools and colleges in the fortnight immediately after the release of exam results at the end of June. In a typical sixth form college with around 700 applicants this will mean a significant number of students are likely to be changing their plans based on their actual results, some may not have made any clear plans. This will require the provision of a lot of individual advice sessions for students, updating of references and providing support for students who need to write new personal statements. We're not convinced that the 10 working days up to the equal consideration day at the start of the third week of July will provide enough time to prepare students.

In addition many students will need support after the sixth form college terms ends in the middle of July. These will include students who apply after the equal consideration point or who apply in Apply 3, students going for interview or doing admissions and aptitude tests, and students rejected in Apply 2 who move into Apply 3. This would almost certainly mean that colleges would have to remain open on some basis throughout the Summer with major logistical complications in terms of contracts and costs.

We are also concerned that, without any kind of pre-registration period or formal 'expression of interest' process, the research and planning period in the second year of A level might lack focus resulting in many students leaving it until after they have received their results to do the serious thinking about what degree they wish to study and where. This could considerably increase the pressure on both individuals and providers in the application fortnight. In other words the PSA proposal on offer rather than facilitating more considered preparation for applying to HE across Year 13 could simply incentivise leaving it to the last moment which would not be a good thing from the point of view of institution workload or widening participation.

Changes to the Examination Timetable

There are already serious concerns on the part of sixth form colleges about the erratic quality of marking and assessment in public examinations. Reducing examination time to five weeks could increase the number of mistakes in the marking of scripts. This would entail more time and resource expended in supporting a greater number of student appeals which in turn will delay these students putting in their UCAS applications and increasing the workloads of Colleges in what would have been the Summer holidays.

We are also very concerned about the ability of the Examination Boards to recruit appropriate and experienced examiners over this critical five week period. Given that the majority of examiners are teachers this would require negotiating their full time release from other duties and few schools and Colleges will be in a position to do this. This could seriously weaken the quality of markers and examiners and further exacerbate the issues outlined above.

We hope these extended comments are helpful.

Yours sincerely,

David Igoe
Chief Executive

