Post-Qualification Admissions Reform

Government consultation

Preliminary Equality Analysis

The Public Sector Equality Duty

The Public Sector Equality Duty places a legal obligation on government to consider how its policy or service decisions impact differently on different people. Under Section 149(1) of the Equality Act 2010, the Secretary of State (SoS) has a duty to have due regard to the need to:

- eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010;
- advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it to:
- foster good relations between persons who share a relevant protected characteristic and persons who do not share it

The Equality Act 2010 identifies the following as protected characteristics for the public sector equality duty: [1]

- age;
- disability;
- gender reassignment;
- pregnancy and maternity;
- race;
- religion or belief;
- sex; and
- sexual orientation.

This initial equality analysis focuses on the following protected characteristics of students and staff: ethnicity, gender and age. We have not considered other protected characteristics as data is not available. Although not a protected characteristic we have also considered the impact on disadvantaged students. The Government has a strong interest in widening access from all backgrounds and students from disadvantaged are likely to have lower rates of participation in the same way as some protected groups. By looking at disadvantaged groups, we can understand how the impact on student groups with different protected characteristics might vary by socio-economic status.

Analysis of equality impacts

Analysis of mismatching by The Nuffield Trust (2019)[1] finds disparate rates of mismatching according to student's characteristics. This may be attributed in part to students with different characteristics and backgrounds having unequal access to the

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[1] [Mismatch in Higher Education](#)

information, advice and guidance needed to effectively navigate the complexities of the current system, though could also be attributed to differing likelihoods of being given accurate predicted grades (as is explored in more detail in Wyness (2016) [2]. It thus follows that we could expect the implementation of a new admissions system to have an unequal impact on different protected student groups.

Age

Almost all students applying to university whilst studying A level (or equivalent) qualifications are in the same age group, so there is no reason to expect the impact of predicted grades will vary by age. Mature students who already hold entry grades will not be impacted by this change. Individuals in older age groups can study equivalent qualifications to gain access to HE (known as "access to HE"), however, predicted grades are not given as part of these courses, so the changes to the admissions system are unlikely directly affect this group.

Gender

Analysis by The Nuffield Trust (2019)[3] identified that boys and girls have on average different likelihoods of being underpredicted[4] though this varies by the level of attainment considered, with boys having a slightly lower likelihood of mismatching at high levels of attainment. Similarly, Wyness (2016) found very similar likelihood of underprediction at low levels of attainment[5]. At mid-levels of attainment, the analysis indicated that boys are 1.1 percentage points more likely to be underpredicted, and at high attainment levels girls are 1.8 percentage points more likely to be underpredicted. This evidence suggests that the implementation of PQA could disproportionately benefit mid attaining boys and high attaining girls.

Ethnicity

Wyness (2016) also examined the likelihood of being under predicted according to ethnicity. The analysis finds that at all levels of attainment white students are the most likely to be underpredicted (see Figure 5 below). The difference is most severe at high levels of attainment with (compared to White students who were the baseline) Asian students 10 percentage points less likely to be under predicted, black students being 15 percentage points less likely to be under predicted and mixed-race students being 11

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[2] Wyness (2016)

[3] Mismatch in Higher Education

[4] A students is underpredicted when attained grades are above their A level predictions in terms of the number of points achieved where E = 1 and A* = 6.

[5] Low levels of attainment are grades below CCC, mid attainment is between CCC-AAB, high attainment is at or above AAB

percentage points less likely to be underpredicted. From this evidence we could infer that students from a white background are more likely to be positively impacted by moving to a system no longer based on predicted grades.

Figure 2: Difference between predicted and actual attainment, by ethnic group
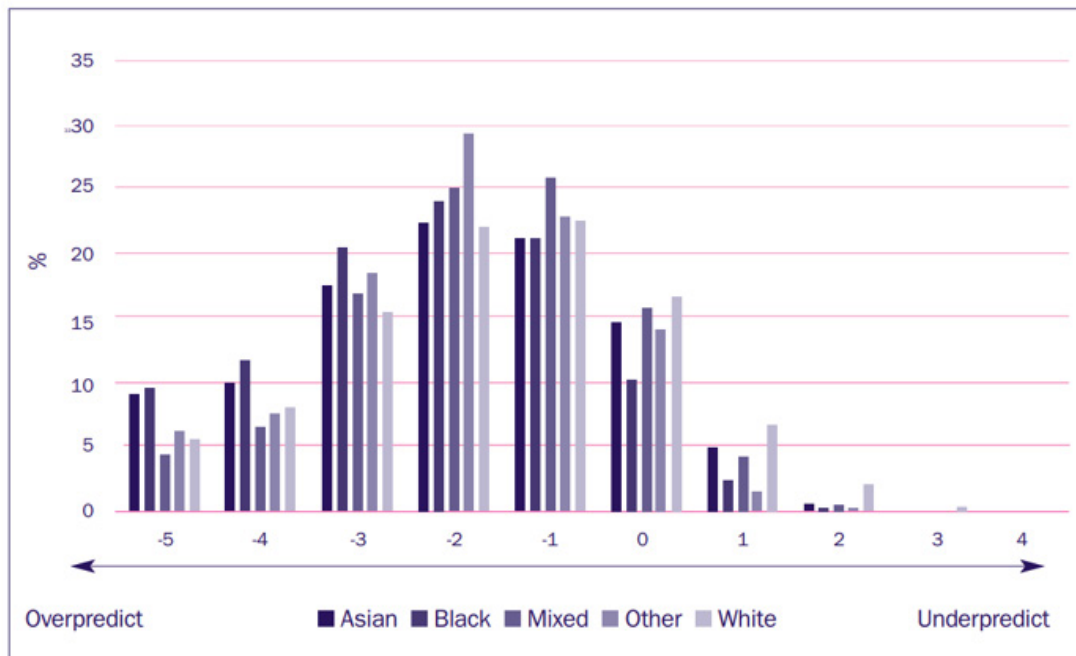
Note 1: Each point on the x-axis represents the achieved point score of the applicant minus the predicted point score of the applicant

Note 2: Points score is defined by UCAS as the points score attached to the highest 3 A level grades achieved by the applicant, with the following points per grade used in the calculation: A*=6, A=5, B=4, C=3, D=2, E=1

Similarly, The Nuffield Trust (2019) find that at lower attainment levels (defined as the bottom 20% of students) there is fairly little difference by ethnicity in the levels of mismatching between attained grades and the selectivity of institutions enrolled. The report finds that low attaining Chinese students are slightly less likely to undermatch and black Caribbean students are slightly more likely to undermatch than white students.

At high attainment levels, the report finds larger disparities with all ethnicities except Black students (in particular Black Caribbean) less likely to undermatch than White students. The lower matching of White students could be explained by higher rates of under-prediction. However, since Black students are predicted higher than white students it is possible that their disparity in HE matchings could be attributed more to unequal access to information and guidance. In any case, it is likely that White and Black students will benefit most from the implementation of post qualification admissions.

Socio-economic disadvantage

Although not a protected characteristic, we have included breakdowns by POLAR quintile due to available data on predicted grades according to disadvantage.

Analysis by Wyness (2016) shows that on average, poorer students are the most likely to be over-predicted by more than one grade and are less likely to be underpredicted (see Figure 4 below). However, after controlling for school type and student background characteristics (e.g. gender and ethnicity), Wyness (2016) finds that high attaining (AAB or better) but disadvantaged students are more likely to have their grades under-predicted than high ability students from more advantaged backgrounds. This means that PQA is likely to have a positive impact on high attaining but disadvantaged students.

Figure 3: Difference between predicted and actual attainment, by level of disadvantage.
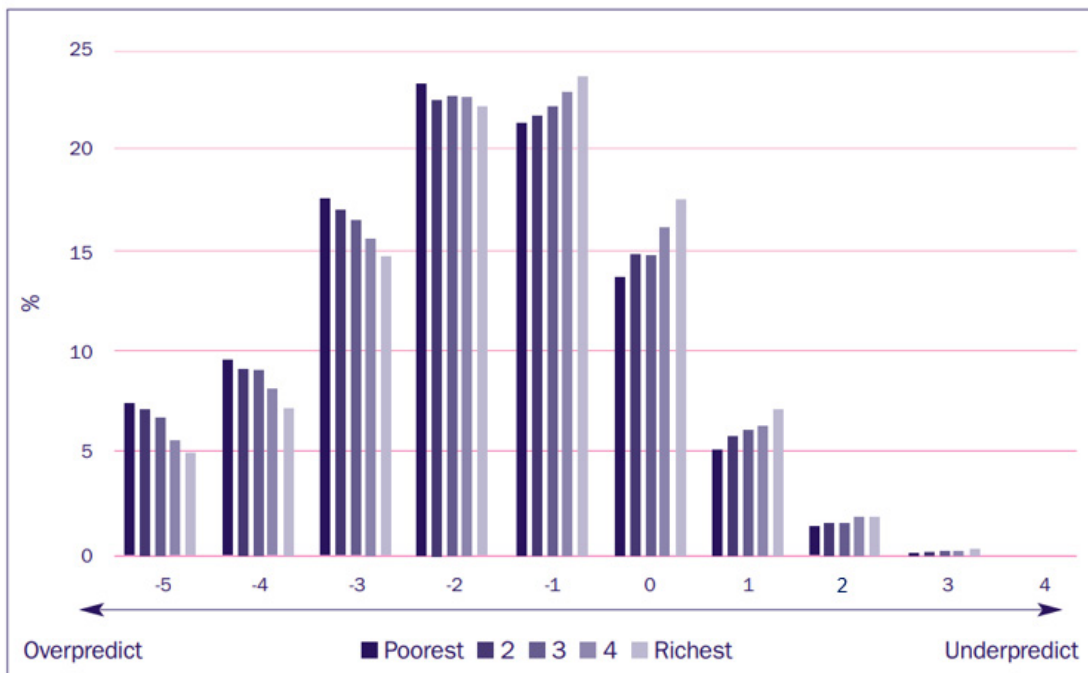
Note 1: Each point on the x-axis represents the achieved point score of the applicant minus the predicted point score of the applicant

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The Nuffield Trust report support this conclusion. The study finds a small disparity in the level of mismatching for low attaining disadvantaged students[6] and a large level of negative disparity for high attaining disadvantaged students.

Unconditional offers

A secondary impact of shifting to a system of PQA is the possibility of eliminating unconditional offers from the admissions process. Conditional unconditional offers are offered to and accepted disproportionately by students with particular characteristics, so impacts of removing them from the system are likely to be disproportionate. Entering HE through this kind of unconditional offer can have a negative impact on educational outcomes, though they also can be beneficial for access to HE and for alleviating the stress and anxiety that can accompany conditional admission to higher education. Unconditional offers would not be ruled out for those with existing qualifications or special circumstances under a reformed system.

POLAR

UCAS data[7] indicates that students from disadvantaged backgrounds (lower POLAR quintiles) are more likely enter to higher education via unconditional offers. This is due in part to lower attainment and predicted grades (which are associated with a higher chance of receiving and accepting unconditional offers[8]), though also due to unequal access to information and guidance. On the one hand, this may suggest that disadvantaged students will disproportionately benefit from the phasing out of unconditional offer due to the negative effects they can have on students. Though it could also be the case that disadvantaged students depend on unconditional offers to gain access to HE, and participation could drop if this channel of admissions is removed from the system.

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[6] In this report NS-SEC class data was used to assess relative levels of deprivation. This measure assigns each student a level of socio-economic status according to the profession and employment status of students' parents at age 13. In this document "Disadvantaged students" refers to low SES students.

[7] UCAS data

[8] https://www.ucas.com/data-and-analysis/undergraduate-statistics-and-reports/ucas-undergraduate-end-cycle-reports/2018-end-cycle-report