

## Higher Education Standards Panel

### Consultation on the Transparency of Higher Education Admissions Processes

ACPET Submission

May 2016

## **Introduction**

The Australian Council for Private Education and Training (ACPET) welcomes the opportunity to provide a submission on options to improve the transparency of higher education student admissions processes. In making its submissions, ACPET notes the Minister for Education and Training is seeking advice on options that will not only improve transparency but minimise regulatory impacts.

Established in 1992, ACPET is the national industry association for private providers of tertiary education and training. ACPET has over 1,000 members who deliver a range of higher education, VET and English language courses across all states and territories and internationally. Seventy-eight (78) of these members are higher education providers (HEPs).

ACPET's mission is to enhance quality, choice and innovation in Australian tertiary education and training. ACPET members include commercial and not-for-profit entities, community groups, industry providers and enterprise-based organisations. ACPET works with governments, industries and other stakeholders to ensure higher education and training services are well targeted, accessible and delivered to a high standard.

ACPET supports the goal of improved transparency not just in relation to admissions processes but more broadly across the higher education sector. The recent moves to include HEPs in the Quality Indicators for Learning and Teaching (QILT) initiative were welcomed by ACPET as a way of improving student information and choice.

## **Scope of HEPs Delivery**

The most recent statistical report from the Tertiary Education Quality and Standards Agency (TEQSA) indicates 178 registered providers delivering higher education in Australia. This comprises 135 HEPs and 43 universities. All but six of the HEPs do not hold Self-Accrediting Authority.

These 135 HEPs delivered higher education services to around 110,000 of the 1.39 million domestic and international students in 2014. Some 65,000 were domestic students which is 6.3 per cent of the 1.04 million domestic student total.

A major feature of HEPs, which ACPET believes contributes to the high level of overall student satisfaction reported in the recent QILT Student Experience Survey, is their smaller scale compared to universities. Whereas all but four universities reported more than 5,000 equivalent full-time students no HEP had this many students in 2014. Ninety-nine (99) HEPs had less than 1,000 students with half of those (47) having less than 100 students. These smaller student numbers, together with diverse course offerings and admission requirements, are reflected in the admissions processes used by HEPs.

## **HEPs and Admissions Processes**

There has been considerable recent debate in relation to tertiary admissions processes. Much of the concern relates to the lack of clarity around the use of the Australian Tertiary Admissions Rank (ATAR)

by universities following the introduction of demand-driven funding. Certainly the focus of the consultation paper is very much on ATAR, notwithstanding that less than a third of undergraduate students are admitted on that basis. ACPET does not believe that HEP admissions processes have contributed to the recent concerns about the use of ATAR.

For HEPs, where Commonwealth Supported Places (CSPs) are not available, ATAR is one of a number of methods used to assess student admission applications. Subject results, auditions, interviews, employment histories and industry specific requirements are also used.

While Tertiary Admissions Centres (TACs) are used extensively by universities, this is less the case for HEPs due to diverse student cohort and admissions requirements, especially for specialist providers. Advice from ACPET members indicates access to TACs can be problematic and expensive.

While TACs may be a suitable mechanism for some providers to support their admissions processes, clearly they are not appropriate for all HEPs. The range of existing options need to be maintained.

Any reforms to enhance the transparency of admissions processes need to recognise and cater for HEPs that are using a range of processes.

### **Improving transparency**

ACPET strongly supports higher education admissions processes that enable prospective students to make the best choice to address their personal and career aspirations. The proposed principles to guide advice and initiatives outlined in the consultation paper are, in the main, supported.

As identified in Principle 4, revised Higher Education Standards come into effect on 1 January 2017 and these should provide the operating environment to guide transparency requirements. These revised standards include a strong focus on admissions processes.

As noted above, the vast majority of HEPs do not hold Self-Accrediting Authority. Their adherence to the Standards that govern admissions processes will, as now, be regulated by TEQSA. All providers, including universities, need to detail and be held accountable for complete, accurate and transparent information regarding their admissions processes.

Recent transparency concerns have been in relation to universities' use of ATAR. There have not been similar concerns in relation to HEPs. It would seem appropriate, therefore, to address the transparency concerns directly with the universities before considering additional measures for all providers. This approach would assist in limiting the regulatory impact.

The diversity of admissions processes means that information consistently presented and comparable (as detailed in Principle 6) whilst ideal may present some challenges. While ACPET would support some standard capture and reporting of admissions processes this should support and not replace existing provider strategies.

To further assist prospective students, the publication of provider course admissions, completion and graduation data should also be considered. ACPET notes that TEQSA holds some of this information.

ACPET supported the recent QILT enhancements that includes some HEPs and reports their performance. The capacity for prospective students to select institutions and disciplines of interest for comparison is a strong feature. The expansion of QILT to include standard admissions processes

information would be an option to address the principle of a single online platform, as articulated in Principle 7.

The use of QILT or another platform should complement and not replace a requirement for complete, accurate and transparent admissions processes information in all relevant provider materials, web sites etc.

## Response to Questions

### Question 1

*Based on your experience, what is the most important information needed to help potential higher education students determine which course to study and which institution to apply for? Please feel free to rank the different types of information in order of importance.*

- *Examples could include information about course prerequisites, ATAR cut-offs, other non-ATAR-related entry options or requirements, possible career pathways and qualification requirements, institution reputation, campus facilities, course cost, student peer cohort characteristics, family history or other connections to a particular institution, accreditation of a course by a professional body or association, graduate employment and earnings outcomes, student reviews or surveys of teaching quality, recommendations from friends or family.*

Advice from ACPET members indicates that all of the above can be relevant to student choice. Noting the specialist nature of some HEPs, the reputation of the provider with industry can be particularly significant in informing potential students.

It is also important that students enrolling in sub-degree or enabling programs clearly understand the articulation arrangements and the impact on career pathways.

With the increasing focus on outcomes across the tertiary education sector, student admission, graduation and employment rates should also be published.

### Question 2

*Is knowledge about how the ATAR rankings are calculated and published 'cut-off' thresholds a significant influencing factor on course and institution preferences? How could this information be made more accessible and useful?*

ATAR rankings are clearly an important consideration for school leavers in particular. They imply greater demand for a course. It is less clear that potential students have, or need, detailed knowledge about how ATAR rankings are calculated.

Summary information could be included on the proposed single online platform (Principle 7) with links to sites with more detailed information.

### Question 3

*Is there sufficient information about how 'bonus points' are awarded and used to adjust 'raw' ATARs sufficiently understood? Should the application of bonus points be more consistent across different institutions? Is the current variety of different bonus point rules appropriate to meet the needs of individual students and institutions?*

How bonus points are awarded and used is not clearly understood given the recent concerns. If they are to be used, they need to be clearly identified in provider admissions processes information.

Consistent with Principle 3, providers should retain autonomy over their admissions processes including the use of bonus points etc. The key is to ensure that the publication of complete, accurate and transparent information on admissions processes for all courses by all providers.

### Question 4

*Is there sufficient knowledge of the range of alternative admissions procedures employed by higher education institutions?*

- *Examples could include 'early' offers on the basis of previous year's cut-off or school recommendations.*

Given alternative processes dominate undergraduate admissions, it would seem there is significant awareness by potential students of the range of alternative admissions procedures. A priority is to ensure the criteria for alternative admissions processes are clear.

The success of HEPs reliant on alternative admissions processes depends on providing complete, accurate and transparent information to prospective students. These providers invest significant resources in building efficient and effective strategies to support these attraction and admissions processes. While some standard information provided through a single online platform could assist, providers must retain the ability to present their admissions processes information through these various strategies.

### Question 5

*Should there be an annual report of the proportion of students accepted into courses by each higher education institution on the basis of their ATARs and/or what the median ATARs was for each course?*

Consistent with the need for greater transparency, ACPET would support the publication of data on students accepted into higher education institutions. Providers should also be required to publish this information with their admissions processes details.

Given Principle 7 proposes a single online platform, it would be appropriate to include this information in any enhancements to QILT or other online resource.

### Question 6

*Do the current state-based Tertiary Admissions Centre arrangements adequately cope with students' desire for mobility to institutions across state borders? Would a more national approach to managing applications across borders be beneficial?*

The Tertiary Admission Centres (TACs) demonstrate a variable ability to support HEPs. Advice from some ACPET members indicates they can be bureaucratic and expensive and do not align with all HEP business models.

While ACPET would support an approach that enhances cost-effective access for providers, it would not be appropriate for all providers to have their applications 'managed' by a national TAC or similar body.

### Question 7

*Is there an understanding of how such mechanisms as early offers, second round offers and forced offers affect the transparency of higher education entry? How, if at all, should these factors be dealt with for the purposes of transparency?*

As noted above, the full details of institution admissions processes need to be clearly articulated in accordance with the Higher Education Standards and appropriately enforced.

For those seeking a broader understanding of these mechanisms a link to a central site could be provided from the proposed single online platform.

### Question 8

*What information or enhancements do you think should be added to the Australian Government's [Quality Indicators for Learning and Teaching \(QILT\)](#) website?*

Details of the proportion of students accepted based on raw ATAR, adjusted ATAR, and non-ATAR admissions processes would provide a fuller understanding of each HEP's admissions processes.

In addition, graduation and employment rates would assist prospective students to make more informed decisions.

### Question 9

*How best should comparable information on student admissions procedures be made available to the public? What is the most appropriate and effective way to communicate information to students? What information or enhancements do you think should be added to Tertiary Admission Centre websites, university and non-university institution websites, and/or Australian Government websites such as QILT and Study Assist?*

ACPET supports enhancement to QILT to provide comparable information to students. As noted throughout this submission there is considerable variability in providers and their admissions processes.

Accordingly, some level of base information on QILT should be supplemented with more detailed information in provider admissions processes materials.

### **Question 10**

*What special measures are needed to ensure equity of access for disadvantaged students?*

ACPET has some concerns with the use of bonus points or other measures that enhance access for educationally disadvantaged students. The potential to 'set students up to fail' is the key concern, particularly where additional learning support is not provided.

Greater use of sub-degree and enabling programs may be better approaches to support these students.

### **Question 11**

*Can you suggest any other changes that would improve public awareness and understanding of tertiary admissions processes?*

### **Comments**

Nil