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27 May 2016

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Dear Professor Shergold

The Australian National University welcomes the opportunity to provide feedback to the Higher Education Standards Panel on Higher Education Admissions Processes. We affirm the submission of the Group of Eight to the panel, including the role of an ATAR and the development of requirements additional to the ATAR in appropriately ensuring opportunity for student success and maximising the use of Commonwealth funds. We would like to take this opportunity to further expand on and explore a number of matters, including transparency and access to information.

We strongly support the majority of the proposed principles identified by the Panel. The principles of access to information, no matter student background (Principle 2), and the need for readily available and comparable information on admissions pathways and requirements, and having that in a single platform (Principles 6 and 7) are core to the University's role as Australia's national university and our education of the nation, rather than just of students who have completed Year 12 in NSW or the ACT. These principles should not be unique to a national university but should be consistent goals across our higher education sector.

To this end, we note that question six of the feedback questions queries whether state based Tertiary Admissions Centres (TACs) are able to adequately cope with student desire for mobility across state borders.

Of course having multiple admissions centres – along with opaque criteria for admission – does not adequately cope with student desire for mobility across state borders and necessitates multiple applications in multiple TACs. The more important question to ask is whether the sustained presence of multiple state-based TACs that serve exclusive markets is in any way consistent with the need expressed in Principle 2 for “All students, *no matter what their background*, should have the same knowledge of how admissions arrangements work.” Given geographic background informs access to variable admissions arrangements, the maintenance of state-based TACs undermines the realisation of this Principle.

The current organisation of TACs promulgates structural inefficiencies and obscures application requirements and processes. For an institution, the costs of entering a new market through a TAC are several hundred thousand per state. That cost presumes that a particular TAC will and should determine an institution's eligibility to participate in their state at all. As a University, we are unable to obtain transparency in decision making and process in the current state-based TAC system. How then could a student ever hope to do so?

We fully support the move to a national TAC to place student interests front and foremost, and send a clear message to the sector that student interests are paramount, above any state or institutional interests and certainly above the financial or sustainability interests of TACs.

We also note the disparity in the sector between published entrance ranks (ATARs) and actual ranks used for admission. As previously provided to the Higher Education Standards Panel through our University FAQs on admission, The Australian National University has guaranteed entry cut-offs published well in advance as well as publicly available information about bonus points and absolute quality floors. We believe that to do otherwise would be misleading, and fundamentally inconsistent with the Trade Practices Act.

In the Principles proposed by the Higher Education Standards Panel, Principle 9 indicates “that prior year ATAR thresholds are provided only as a guide to prospective students.” We reject the fundamentals of that system as indicators still do not make clear the expectations for the current cohort of applicants.

ATARs currently act as a proxy for:

- A ranking of an individual’s overall position at the end of year 12 with regards to their cohort
- An indicator of an individual’s aptitude;
- An indicator of the requirements for a reasonable possibility of success in a course of study;
- A hangover from the capped place system where they were used to manage intake sizes; and
- A status and marketing symbol that allegedly speaks to the quality of an offering.

The assumption that ATAR is a proxy for status may place undue pressure on students ‘not to waste’ their ranking, and for universities to publish cut-offs that are far above actual requirements either in terms of student ability or demand for places. This disadvantages students who do not know that there can sometimes be a substantial gap between published and actual cut-offs. It will disadvantage students with the least familiarity with the higher education system the most, and in particular ‘first in family’ students.

Control of numbers and intakes needs to be clearly separated from the measure of academic standing required to be successful. We would suggest introducing the requirement to clearly publish, each year, the entrance rank (ATAR or equivalent) required to be successful (a quality floor) as well as the expected rank required due to demand.

We would also suggest that continuing the practice “that prior year ATAR thresholds are provided only as a guide to prospective students” enables ongoing immaturity in what is a large and well-established sector. If institutions continue to be able to avoid providing reasonable forecasts and baselines then the selection of future study opportunities by the nation’s students will continue to be an exercise in networks and chance.

Yours sincerely

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