

## Higher Education Standards Panel

### Submission to the

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

The Council of Private Higher Education (COPHE) understands the concern expressed by the Minister for Education and Training and commits itself to work with member institutions and peak bodies to achieve transparency in admissions processes.

#### Comments on the Proposed Principles

With one exception COPHE endorses all of the Principles set out in the Discussion Paper (including the principle that any new requirements should apply equally to all higher education institutions, universities and non-university institutions alike). The exception to this general expression of support is the proposal (at Principle 7) that a single online platform be created to provide a guide to admissions policies. This seems to be more an anticipated solution than an underpinning principle, and if accepted may impede other, possibly more elegant ways, of providing admissions transparency.

Given the findings of the La Trobe/UNE Report (March 2016) with regard to the disadvantage suffered in admissions by students from low SES backgrounds, COPHE would also suggest that Principle 2 could be rephrased to express more explicitly a requirement that all admissions processes should be so framed as to be clear and accessible to such students.

#### General Comments

1. COPHE understands that complexity in admissions processes has evolved as, over a number of years, institutions and State-based Tertiary Admissions Centres (TACs) have attempted to respond, in an equitable way to the influx of a variety of student cohorts, especially following the introduction of the demand driven system. COPHE would argue, therefore, that the expertise of the TACs and institutions should be harnessed in the effort to achieve greater transparency. Private institutions have generally had less engagement with the TACs and until fairly recently some of the TACs would not include them.

We suggest that a great deal of progress could be achieved through industry self-regulation measures that could be implemented as a result of consultation between peak bodies, TACs and TEQSA, thus avoiding the need for additional government regulation. It is acknowledged that such collaborative effort will involve significant challenges and take some time to bring to completion but it should not, because of that, be avoided.

2. Questions have been raised about the ongoing utility of the ATAR. COPHE is of the view that the ATAR has continuing role as a component of admissions criteria for a particular (significantly sized) student cohort. The utility of the ATAR component in the processing of admissions by TACS and institutions should be acknowledged. At the same time, the twin facts that admission by ATAR applies to only 30% of students, and that ATAR is a *component* of admissions criteria (at least for most TACs and institutions) needs to be better communicated to both students and

the public. Perhaps a change of terminology may help from ATAR to (for example) Secondary Education Ranking? Along with this there needs to be better communication of alternative admissions pathways.

## Responses to Questions

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.

*This question raises broader issues than those posed by transparency of admissions processes. Published admission standards may influence student choices but will be one factor among many. Factors include:*

- Career pathways
- Employment outcomes
- Entry criteria and processes, including special entry schemes and pathway programs
- Assumed knowledge and optimum preparation, including high school subject selection
- Student cohort characteristics, including ATAR profile for the previous year (ie the ATAR range and median for admission in the previous year)
- Student support and intervention strategies
- Course progression and completion rates.

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?

*For the 31% of students who enter higher education on the basis of their ATAR:*

- *Knowledge of how ATAR rankings are calculated may positively influence their choices if they have sufficient information at a sufficiently early stage to allow them to make informed subject selections in Years 11 and 12 of high school. Transparency and equity in admissions processes will, therefore, include the provision of sufficient information at a sufficiently early stage in the high school years. If it is not already the case, the provision of this information should be made mandatory (we suggest for all Year 10 students). If they do not already do so perhaps the State TACs could provide workshops for high school staff involved in advising students regarding subject choices at this level.*
- *Published cut-off ATARs may influence course and institution choice because (a) a high ATAR entry level may be perceived as a proxy for quality and/or status and (b) the use of the term ATAR cut-off is misleading and may deter students from applying for a certain course. COPHE's view is that the term 'cut-off' should be replaced with 'indicative ATAR' (or a similar term) and that the published indicative ATAR should be accompanied by caveats stating that (i) the indicative ATAR indicates that students holding this ATAR should have the capacity to complete the course successfully and on this basis it is used by the institution as a guide to admissions; (ii) students who feel their ATAR has been negatively affected by personal circumstances should not be deterred from applying for the course, and (iii) that the institution may, in certain circumstances, admit students with a lower ATAR than the indicative ATAR and that students should refer to the previous year's ATAR range as a guide to whether or not they might be offered a place. In connection with (iii) above COPHE proposes that institutions should provide, on their websites and on any associated websites (for example TAC websites), the ATAR range and median for admission to the course in the previous year. In view of the public interest in*

*this issue TEQSA might be requested to monitor variations between the published indicative ATAR for courses and the actual median ATAR for course entry in the following year.*

- *On the basis of a survey undertaken of our own members we are not confident that 31% of students actually enter higher education on the basis of an ATAR. It is clearly an important component but all the responses we have had indicate it is but one indicator.*
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?

*In COPHE’s view there is very little understanding about how ‘bonus points’ are awarded and used to adjust ‘raw’ ATARs. This is hardly surprising given the range of schemes offered by individual institutions and operated by the TACs. COPHE recommends discussion and possible national adoption of the South Australian model whereby institutions agree on the allocation of bonus points. Once institutions have agreed on such allocations, if an individual institution wishes to engage a particular equity group it might do this through the use of equity scholarships.*

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

*There is certainly a lack of knowledge among the general public both on the range of alternative admissions pathways and the proportion of students who are admitted through them as compared to those admitted on the basis of ATAR or secondary education. This general ignorance may deter certain cohorts (for example, mature age students) from applying.*

*COPHE would argue that, whatever the admissions pathway, consistent information must be provided at a discipline or course level, if students are to navigate the process more readily. The information provided needs to be consistent, clear, and sufficient (rather than complex). To this end COPHE suggests the use of Standardised Information Statements\* similar to those used in for the Private Health Insurance Industry. These statements were developed to address the issue that consumers found it difficult to compare coverage under different policies. COPHE considers that something similar could be developed for the higher education sector. Anticipating an objection about the workload involved in implementing such a system it is suggested that an SIS could be added to course information and web pages as each course is reviewed as part of the institution’s regular course review cycle.*

*\*Standard Information Statements (SIS) are available on all private health insurance policies available in Australia. Health funds are required by law to provide these Statements so consumers can review existing policies or compare private health insurance products. <http://www.privatehealth.gov.au/faq/sisguide.htm>*

*As an exercise, we have developed a template to see what a ‘Standard Information Statement’ for admissions at course level would look like, taking into account that the information required to populate it must already exist to support the TACs. Our first draft is attached as Appendix 1.*

*Most private institutions, where course accreditation is undertaken by TEQSA would already have an admission standard for each course.*

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?

*As discussed above, more information on students admitted through the various admission pathways (not just by ATAR) would be useful. With regard to reporting on admissions by ATAR it should be possible to report a more detailed ATAR profile, either by bands or at least quartiles. The key will be providing ATAR and other admission criteria in a way that is readily understood by potential students.*

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?

*In general COPHE would support any measures that enable student mobility. Given, however, that apart from high demand course such as Medicine, Australian students tend to study in their own state; COPHE believes a more national approach would be beneficial in terms of national consistency and transparency in admissions processes, and that this should be given priority. Measures to increase student mobility might be adopted as a longer term goal.*

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?

*Many of these mechanisms are opaque to students and the general community and as such negatively affect transparency. More information, including definition of terms and concise descriptions of the ways the various mechanisms work should be provided and made accessible on institutional admissions pages and TAC webpages (possibly by hyperlink to the institutions).*

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

*COPHE considers that addition of admissions data to the QILT website could confuse the purpose of QILT and thus decrease the usefulness of the QILT website for students. This is especially the case given the tendency to see ATAR as a proxy for quality and given the amount of information that would be required to convey accurately the various alternative admissions processes for each institution and/or TAC.*

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?

*See our responses above to questions (4) and (8).*

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

*See our responses above to question (2). Better promotion of existing pathway and enabling programs would also support better equity of access.*

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

*Tertiary admission procedures, if they are to provide equitable access to various cohorts of students, will necessarily involve a degree of complexity. That said, public understanding will be helped by whatever can be done to reduce that complexity and to present to the public a clear picture of admission pathways and criteria.*

*Effective communication of longitudinal completions data might also help offset public concerns about higher education entry standards.*

## About COPHE

COPHE is a peak body representing higher education institutions that are independent of Australian public universities. The membership is diverse and includes private universities and institutions operating from more than 80 campus locations across Australia. Members vary in student enrolments from under a hundred to a few thousand and include not-for profit and for-profit operations. Courses offered range from pathway diplomas through to bachelor and master's degrees, often linked to professions and employment. Some members also offer research degrees, including PhDs.

The private sector in higher education is recognized for the quality of student outcomes delivered by a very diverse range of smaller institutions that focus on the quality of teaching.

The diversity is also evident in the provision of international education where for some institutions it is their main focus and others where it is a minor part of their activity. For COPHE, seeking policy that assists the latter and encourages all students to think as global citizens is a priority.

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## Higher Education Standard Information Statement

This Statement provides basic information for prospective students for the purpose of comparison only.  
For comprehensive information on courses please visit ([the relevant institution's website](#)).

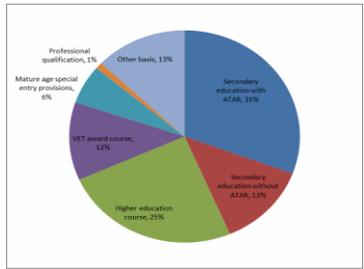
<b>Course:</b> <i>(Full course title)</i>	<b>Institution:</b> <i>(Issuing Institution)</i>
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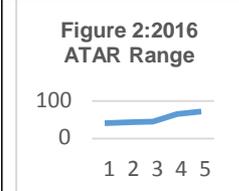
### Admission Requirements and options for 2017

<b>What are the 2017 admission requirements?</b> <i>(Refer note 1)</i>	<b>What are the 2017 admission options?</b> <i>(Refer note 2)</i> <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> ATAR</li> <li><input checked="" type="checkbox"/> ATAR including bonus points             <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> Subjects</li> <li><input checked="" type="checkbox"/> ATSI</li> <li><input checked="" type="checkbox"/> Regional</li> <li><input type="checkbox"/> Other (specify)</li> </ul> </li> <li><input type="checkbox"/> ATAR plus portfolio, interview etc</li> <li><input type="checkbox"/> Portfolio, interview etc</li> <li><input checked="" type="checkbox"/> Pathway program</li> <li><input checked="" type="checkbox"/> VET/HE study</li> <li><input checked="" type="checkbox"/> Early entry</li> <li><input type="checkbox"/> Other (specify)</li> </ul>
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Details at ([institution link](#)) and ([State Admissions Centre link](#))

### Admission in 2016

<b>How were students admitted in 2016?</b> <i>(Refer note 3)</i> <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <thead> <tr> <th style="width: 80%;">Method</th> <th style="width: 20%;">%</th> </tr> </thead> <tbody> <tr><td>ATAR</td><td></td></tr> <tr><td>ATAR incl. bonus points</td><td></td></tr> <tr><td>ATAR plus portfolio etc</td><td></td></tr> <tr><td>Pathway program</td><td></td></tr> <tr><td>VET/HE study</td><td></td></tr> <tr><td>Early entry</td><td></td></tr> <tr><td>Other (specify)</td><td></td></tr> </tbody> </table>	Method	%	ATAR		ATAR incl. bonus points		ATAR plus portfolio etc		Pathway program		VET/HE study		Early entry		Other (specify)		<b>Figure 1: Basis for admission in 2016:</b> 
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<b>What was the ATAR range for successful applicants in 2016?</b> <i>(Refer note 4)</i>  Minimum ATAR: Median ATAR: Maximum ATAR:	<b>Figure 2:2016 ATAR Range</b> 
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### Student success rate

What percentage of students neither complete nor return to this course in a given year (attrition rate)? <i>(Refer note 5)</i>	
What percentage of students complete this course in the minimum time (progression rate)? <i>(Refer note 6)</i>	
What percentage of students graduate from this course (completion rate)? <i>(Refer note 7)</i>	

Study Mode/s	Location/s	Duration	Fees: <i>(Refer note 11)</i>			
<i>(Refer note 8)</i>	<i>(Refer note 9)</i>	<i>(Refer note 10)</i>				

<b>Professional Accreditation:</b> <i>(Refer note 12)</i>	<b>Fees Key</b> <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 5px;"> <tr><td style="width: 20px; height: 10px; background-color: #fff9c4;"></td><td>Commonwealth Supported Places</td></tr> <tr><td style="width: 20px; height: 10px; background-color: #c8e6c9;"></td><td>Fee Help places</td></tr> <tr><td style="width: 20px; height: 10px; background-color: #ffcdd2;"></td><td>Full Fee places- domestic</td></tr> <tr><td style="width: 20px; height: 10px; background-color: #bbdefb;"></td><td>International</td></tr> </table>		Commonwealth Supported Places		Fee Help places		Full Fee places- domestic		International
	Commonwealth Supported Places								
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	Full Fee places- domestic								
	International								

Explanatory Notes	
	1. List all admission requirements for the course, such as level of secondary schooling, English language requirements, assumed knowledge; provide a link to websites.
	2. Indicate all options for admission available to students. Specify any additional options for students; provide a link to websites.
	3. Specify the pathways used to admit students in the preceding year and the percentage of students admitted under each option. Provide this information in a pie chart.
	4. Provide the range of ATAR scores as indicated (Minimum, median, maximum score) for students admitted to the course in the most recent year for which data is available. Provide this information in a line graph.
	5. Provide attrition rate, as per HEIMS definition, for the most recent year for which data is available.
	6. Provide progression rate, as per HEIMS definition, for the most recent year for which data is available.
	7. Provide completion rate, as per HEIMS definition, for the most recent year for which data is available.
	8. List all modes of study using HEIMS categories:
	<ul style="list-style-type: none"> <li>• Internal Mode (on-shore and off-shore campus, includes classroom based)</li> <li>• External Mode (on-shore and off-shore campus, includes electronic based, on line and correspondence.</li> <li>• Multi-modal</li> </ul>
	and Indicate whether full time/part time.
	9. List all locations the course is offered.

10. Provide nominal duration for full-time, part-time or other patterns of attendance.

11. Indicate all funding options for students and any variation based on study mode or attendance pattern.

12. Indicate any professional accreditation available to graduates of the course.