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Dear Professor Shergold

## TRANSPARENCY OF HIGHER EDUCATION ADMISSIONS PROCESSES

TEQSA welcomes the opportunity to respond to the Higher Education Standards Panel (the Panel)'s consultation on the transparency of higher education admissions processes. We also found the opportunity to discuss this matter directly with Panel members helpful, particularly in light of our responsibility for assisting the sector to make the transition to the new *Higher Education Standards Framework (Threshold Standards) 2015* (HE Standards) which comes into effect on 1 January 2017.

This consultation is welcome and timely. The ability for prospective students to access clear, reliable, transparent and comparable entry information, regardless of institution applied for or the background of the applicant, is essential for the effective operation of student choice, the achievement of successful educational outcomes and the attainment of equity and fair access goals. While it is undoubtedly the case that many providers provide exemplary information, there is also evidence that this is not universal. It is also the case that, even where individual provider information is clear and accessible, the capacity of students to make comparisons across the sector and then make informed choices between institutions is limited.

A student's experience of higher education begins with the admissions process and it is vital that a student can rely on the stated criteria for selection into a course as an indication of their prospect of satisfactorily completing the course. The risk that there is a disconnection between the admissions process and the necessary requirements to successfully undertake a course has implications not just for the student but also for the wider community.

TEQSA recognises the primary responsibility of autonomous higher education (HE) institutions to manage their admissions processes within the HE Standards. Consistent with object (f) of the TEQSA Act to '*ensure students undertaking, or proposing to undertake, higher education, have access to information relating to, higher education in Australia*', TEQSA wishes to ensure that it is providing relevant advice for providers on the requirements of the new HE Standards; that it is taking proper account of the impact of unclear or inadequate entry standards on the risks to students, particularly in relation to attrition; and that it considers appropriately the direct evidence which is provided by the courses it accredits for non self-accrediting institutions.

## Proposed principles and the new HE Standards

TEQSA supports the proposed principles identified by the Panel as necessarily underpinning any improvements it may recommend. The strong emphasis on a student-centred approach is particularly welcome and fits well with the greater emphasis which the new **HE** Standards place on the student experience, from pre-admission through to employment. The recognition of the opportunity provided by the new HE Standards to provide an improved operating framework is important and frames our own understanding of the opportunities for real progress in this area. The Domains in the HE Standards covering Student Participation and Attainment, Institutional Quality Assurance, and the completely new Domain on Representation, Information and Information Management, will all be important in framing a comprehensive institutional and sector-wide approach to the issues of admissions transparency.

As the national quality assurance and regulatory agency with responsibility for all **HE** providers, public and private, we entirely endorse the principle that any changes should apply to all HE providers; equally, we would argue that any solution must take into account the diverse nature of those providers and of the students they admit. While understanding the continuing importance of the ATAR, it is important that the full variety of admissions routes is made transparent and that any common platform is designed with the needs of all applicants, domestic and international, in mind.

The recognition in Principle 7 that a single online platform for information is likely to be one of the improvements required is welcome and we would endorse it. Transparent admissions require comparability and consistency (which are not the same as uniformity) and therefore a sector-wide, as well as institution-specific, response is likely to be necessary. It should be noted that current approaches are often complex and while appearing to have the same objective, for example the use of bonus points, the actual processes differ considerably between providers. Hence there may be a need for simplification of admissions policies and specific information to meet the needs of prospective students. The excellent work already done by the state TACs will undoubtedly contribute to the answer; OILT will, as the paper suggests, also have an important part to play, providing that the potentially misleading suggestion that ATAR scores are in themselves a simple indicator of comparative quality can be avoided. TEQSA, which updates and publishes the National Register of HE Providers, stands ready to contribute to the national platform that may emerge from this consultation.

## Risks and the regulatory framework

TEQSA does not regard entry to a course on the basis of an ATAR as representing a risk in itself. Rather the risk is that such a measure does not adequately consider a student's academic preparedness and the type and level of support that may be required for the student to successfully complete the course in which they enrol. In assessing individual **HE** providers, TEQSA examines the interaction between admission standards, student support and student outcomes. In relation to the new HE Standards, the following Standards play various roles in TEQSA's assessment processes:

- **Section 1.1 – Admission** - forms part of the core set of Standards that will be used to assess applications for accreditation and re-accreditation of courses of those providers without self-accreditation authority. While TEQSA does not examine courses for providers with self-accrediting authority, except in sampling of courses during re-registration, such providers must be compliant with this Section of the HE Standards at all times and their internal processes must ensure that is the case.

- **Standard 5.3.7 in the Monitoring, Review and Improvement Domain**, which requires monitoring, review, external referencing and feedback on courses to inform admission criteria, is part of the core set of Standards that will be used to assess applications for re-registration of existing providers and registration of prospective providers.
- **Section 7.2 in the Representation, Information and Information Management Domain** sets out the requirements for information for prospective and current students.

TEQSA places significant importance on the quality of information provided to prospective students and the new **HE** Standards support this aspect in a number of ways as summarised in the Panel's discussion paper. In addition to the Standards in Sections 1.1 and 7.2 of Part A of the HE Standards, Standards 1.3.2 relating to strategies to support the transition of students and 7.3.1(i) regarding information on indicative annual enrolments per course, are essential considerations for prospective students in deciding which course is most suitable to meet their educational goals.

TEQSA has prepared guidance material indicating that the information available on a provider's website will be used to establish whether the scope of the Standards used to assess an application for re-registration should include further scrutiny of admission processes. This is particularly relevant to an assessment of compliance with Standard 7.2.2d which requires that information about admission requirements be made available to prospective and current students. TEQSA will continue to develop its advice on the application of the new Standards in the time that remains before their introduction and will of course ensure that they are updated to take into account the conclusions of this consultation.

### **The current position**

The consultation paper sets out clearly some of the current difficulties with admissions information. TEQSA's own examination of information available on provider websites highlights a lack of uniformity across the sector in terms of the availability and nature of:

- policies and procedures used to establish admission requirements
- specific guidance for students in interpreting admission requirements
- policies and procedures describing the criteria used for awarding of bonus points, and
- specific guidance to interpret the criteria used to award bonus points.

The disparity in information available creates an information asymmetry between providers and prospective students. Such an asymmetry raises the risk of sub-optimal outcomes for students and providers, such as reduced progression rates and increased attrition levels. The students most adversely affected by these issues will typically be those from non-traditional, low SES or indigenous backgrounds, or those for whom **HE** is a first-in-family experience. Improving the transparency of admissions information is not therefore simply a matter of market efficiency but one of equity and fairness.

While recognising that transparency is the principal focus of the current review, TEQSA, which makes an annual risk assessment of all providers, would wish to ensure that a comprehensive approach to **HE** admissions takes into account the relationship between entry and successful completion. It is currently the case that attrition accounts for a greater number of less than satisfactory risk assessments than any other single risk indicator.

## **The need for guidance for HE providers**

From a regulatory perspective, a proportionate response would seem to be the development of guidance to complement relevant Standards in the new HE Standards that reflect good practices in the sector. This guidance would address the type of information made available and the method used to inform students and the community about entry requirements. Such guidance would include the following elements in relation to admission requirements: the minimum adjusted ATAR; the policies and procedures used to establish admission requirements and the criteria for awarding bonus points; specific guidance for students to interpret admission requirements; alternative routes to admission; the accessibility of the relevant information and the special needs of international applicants.

## **A national, accessible information platform**

TEQSA considers that, consistent with the principles set out in the consultation paper and with TEQSA's regulatory principles of regulatory necessity, reflecting risk and proportionate regulation, a standardised approach to the communication of entry requirements is warranted to address this lack of uniformity across the HE sector. TEQSA is very supportive of the work of OILT in providing a single point for students to access information about higher education providers, and, while it is undoubtedly the case that the benefits and cost of centralising information about admissions policies and student enrolments for all HE providers may require further examination, the relevance of such an approach to the problems identified by the Panel is clear.

TEQSA looks forward to engaging with the Panel and the sector as together we take forward an agreed response to the issues identified so clearly in this consultation paper.

Yours sincerely



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Chief Executive Officer

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