

## **Submission to the Higher Education Standards Panel**

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

#### **Introduction**

The NSW Department of Education with the Board of Studies, Teaching and Educational Standards NSW (BOSTES), welcome the opportunity to make a submission to the consultation on transparency of admissions processes. This submission also takes up the consultation paper's invitation to include comment on other matters related to admissions.

The Department and BOSTES have a strong interest in equitable access to higher education, an important part of which is clear, transparent and timely information about admissions that is equally accessible to all students.

Admissions processes should be based on an obligation for institutions only to admit students who have a reasonable likelihood of being able to progress and complete a course at a standard that meets industry and professional needs and expectations.

More fundamentally there needs to be greater emphasis on aligning expected student achievement outcomes in senior secondary school with academic expectations of university study. As a general principle entry standards should challenge school students wanting to transition to higher education to maximise their achievement.

This submission also raises concerns about the impact of lower entry standards for initial teacher education on the national effort to improve the quality of teaching.

The Higher Education Standards Panel should work with the COAG Education Council in the development of explicit standards for admissions transparency and university entry.

The proposed principles listed in the consultation discussion paper are broadly supported. Additional comment on the principles is provided below.

#### **Transparency Principles**

- 1. A student-centred approach to transparency should be central to any solution.**
- 2. All students, no matter what their backgrounds, should have the same knowledge of how admissions arrangements work.**

Higher education entry standards and admissions processes should be transparent for all potential higher education students, their parents, careers advisers and teachers.

For admissions to be equitable there must be readily understandable, transparent and accurate information publicly available about individual courses at individual institutions.

This is important for a number of reasons. An admissions system that is difficult to navigate discriminates against students who do not have access to support and resources, such as peers and family members who are familiar with the system, or other forms of authoritative advice.

Published cut-off thresholds and entry procedures may have a significant influence on Higher School Certificate (HSC) course selection, as well as course and institution preference. For example, the availability of bonus points for students taking relevant subjects may encourage students to take particular subjects or higher level subjects.

Very high published cut-offs may dissuade some students from even applying, when in fact those students might have been admitted under alternative entry or bonus schemes. Students who are first in family to higher education are particularly vulnerable to this situation.

Alternatively, courses with cut-offs that seem relatively low may dissuade applicants as the ATAR is often taken – whether justified or not - as a proxy for the quality or intellectual content of the course.

Potentially misleading impressions of this kind may be mitigated by greater transparency about the range of ATARs of students actually admitted to courses along with clear information about alternative entry criteria that may have been applied.

**3. The broad autonomy of institutions over their admissions policies should be accepted, providing that these policies are compliant with the Higher Education Standards.**

Institutional autonomy over admissions policies remains an important principle. However this must not come at the expense of transparency, consistency and comparability of information, and the provision of a student-centred approach.

It is noted that the current Higher Education Standards already require provision of “current, accurate, adequate and openly accessible information” including information on “admission criteria, recognition of prior learning and credit and articulation to and from other studies.”<sup>1</sup> Greater clarity and accuracy in the provision of admissions information is needed.

**4. The revised Higher Education Standards, which will take effect from 1 January 2017, should provide the operating framework: they contain clearly articulated requirements in relation to admissions transparency, the provision of information for prospective students, and the quality of learning environments.**

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<sup>1</sup> *Higher Education Standards Framework (Threshold Standards) 2011*, Chapter 1, Section 6.3.

It is important to note that the current *Higher Education Standards Framework (Threshold Standards) 2011* requires institutions to monitor participation, progress and completion by identified subgroups.<sup>2</sup> Institutions already have an obligation only to admit students who demonstrate a capacity to be able to complete the course successfully and have sufficient English language competency to achieve expected learning outcomes.<sup>3</sup>

Students who gain access to courses without adequate academic preparation are at greater risk of non-completion. At least four of every ten students with an ATAR below 60 do not complete.<sup>4</sup>

Institutions should make every attempt to prevent the expenditure of time, private money and public funding on students entering undergraduate degrees who fail to complete because of lack of readiness. This may require a greater focus on diagnosis and support for students who enter under equity schemes.

5. **Any new requirements or changes should apply equally to all higher education institutions, universities and non-university higher education institutions alike.**
6. **Consistently presented and comparable information on all entry pathways and requirements should be available for each institution by discipline or by course**

Admissions information should be provided by course rather than at a discipline level, as students are interested in, and are competing for entry to, particular courses.

Transparency is particularly important where students are admitted by measures other than the ATAR alone. As the consultation paper notes “only 44% of students were admitted in 2014 on the basis of their secondary education – and only 70% of these on the basis of an ATAR”.

Detailed information about all the different methods of entry to university, including ATAR-only; ATAR with other criteria; and non-ATAR pathways should be available to prospective entrants at the individual course level.

This information should include the minimum ATAR of the group of students actually admitted to individual courses, as well as an indication of the distribution of ATARs amongst the group, and the numbers and proportion of students admitted via each method of entry including criteria used to determine entry via non-ATAR pathways.

The information should cover all institutions that offer higher education degrees, including TAFE and private providers.

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<sup>2</sup> *Higher Education Standards Framework (Threshold Standards) 2011*, Chapter 3, Section 5.4.

<sup>3</sup> *Higher Education Standards Framework (Threshold Standards) 2011*, Chapter 3, Section 3.2.

<sup>4</sup> “Completion rates of domestic bachelor students - A cohort analysis, 2005-2013” Australian Government Department of Education.

**7. A guide to admissions policies and student enrolments should be made available through a single online platform for ease of access.**

An easily accessible single portal that contains all necessary information would provide the best solution for potential students, and their teachers and parents. This should include a framework that allows students and families to make comparisons of similar courses and institutions.

It is important that information is also provided at a more general level about the admissions process, including bonus point schemes, different pathways to entry, and how to negotiate the different stages of early offers, main round and second round offers.

This is particularly important for students who may have less familiarity with the higher education sector and may lack other relevant resources including family support based on experience in the sector. For example, there is evidence that high-SES students reap more benefits from making preference changes during the different rounds of university offers.<sup>5</sup>

Providing clear information about admissions processes and standards is one measure that would help address the wider disadvantage that low-SES students suffer in the university application process.

**8. Universities Australia and other higher education peak bodies should publicly support clarity on how ATARs scores are used and the manner in which alternative admissions pathways and policies are applied.**

**9. It should be made clear that ATAR thresholds do not operate as a strict 'cut-off'; that thresholds generally apply to (bonus point) adjusted ATARs; and that prior year ATAR thresholds are provided only as a guide to prospective students.**

Information currently available regarding access schemes, including bonus point and early entry schemes, available on individual university websites can be confusing, unclear and difficult to find. There is also significant variation in the way that schemes operate across institutions that can add to the confusion.

It is important that bonus point and early and conditional university entry schemes operate transparently, and that information is available that is readily-accessible and presented in a framework that allows comparability across institutions.

Public confidence in the admissions process would also be improved by increased transparency regarding the way the HSC and other qualifications are converted to the ATAR scale.

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<sup>5</sup> Cardak, et al (2015), "Are low SES students disadvantaged in the university application process," Curtin University National Centre for Equity in Higher Education. The authors find that students who make more changes to their university applications reap larger benefits, and that high SES students make more changes than low SES students.

## **10. Higher education institutions should be held accountable for public claims against their stated entry policies**

In many cases, entry standards are used as a proxy for the quality of the course – whether or not this is justified – and so there is a marketing incentive for the publication of high entry scores or standards.

Higher education institutions should be held accountable for public claims about entry standards that may give the public the wrong impression about the profile of students actually admitted to courses.

Detailed disclosure of the actual entry profile, as discussed under Principle 6, will ensure appropriate accountability.

### **Admission Standards**

#### **Standards, completions and workforce need**

Under the current funding policy there are financial incentives for universities to enrol increasing numbers of students, particularly in high income-generating courses. It is difficult to justify the year on year over-supply of graduates with low demand degrees and restricted employment opportunities that ensue.

In addition, a growing number of these students are gaining access without adequate preparation, with potentially significant implications for completion rates. For students with an ATAR below 60, four or more of every 10 do not complete.<sup>6</sup>

In the longer term, alongside transparent data about entry pathways, comprehensive data relating to completion rates and employment outcomes for individual courses of study should also be publicly available. It is noted that the QILT website provides some information of this kind and the funding boost announced in the 2016-17 Commonwealth Budget will presumably allow the website to be substantially enhanced.

#### **Initial teacher education**

High entry standards for initial teacher education degrees are a key component in the mix of factors that supports quality teaching.

While admissions processes operate in a complex environment that takes account of a diverse body of students and a range of programs, the higher education sector must not lose sight of its responsibility to produce quality graduates.

The perception that the majority of entrants to teacher education are from the lower end of the academic achievement range works against efforts to raise the status of the profession.

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<sup>6</sup> “Completion rates of domestic bachelor students - A cohort analysis, 2005-2013” Australian Government Department of Education.

In a 2012 consultation on improving the quality of teaching in NSW by far the most common issues raised were those dealing with initial teacher education and the quality of graduate teachers.

For these reasons opaque processes and unclear standards for entry continue to be of concern. Declining entry standards linked to significant over-enrolment in some teaching areas raise legitimate questions about the effect on efforts to maintain quality teaching standards. The following profile of teacher education enrolments illustrates this point.

### ***Initial Teacher Education profile – NSW 2015***

#### *Growth in enrolments*

Between 2002 and 2015, direct school-leaver initial teacher education commencements in NSW grew by over 50%. The percentage of commencing students with ATARs below 70 and 60 more than doubled.

In 2015, 4,698 undergraduate students enrolled in initial teacher education at NSW Universities Admission Centre (UAC) higher education institutions. This is below the peak of 5,302 in 2012 but more than 1,100 above the average in the period 1995 to 2005.

#### *Direct from school commencements*

47 per cent (2,211) of total enrolments in undergraduate initial teacher education in 2015 were direct school leavers. ATAR profiles for this group indicate that:

- 47.5% were ranked below 70
- 29% were ranked above 80.

### ***Improving teacher quality***

Admitting students into Initial Teacher Education with low prior academic achievement, works against the national effort in the schooling sector to support quality teaching.

Improving the quality of teaching is a focus of the NSW Government's *Great Teaching, Inspired Learning* (GTIL) reforms. From 2016 HSC students need to have a Band 5 (a mark of about 80) or higher in three of their Higher School Certificate subjects including English to enter an undergraduate teaching degree at a NSW university, or enter via a BOSTES-approved alternative entry pathway.

Teacher education students will also have to pass literacy and numeracy tests before they undertake their final practicum in order to be eligible to teach in NSW schools. Education ministers from every state and territory have given in-principle support for requiring students to pass such tests before graduation and other jurisdictions are implementing this requirement.

The introduction of minimum academic entry standards in NSW for applicants to initial teacher education programs has received widespread support from parents, teachers, schools, school education authorities and community representatives.

## **University entry and school achievement**

Substantial funding and work is being directed at improving school performance and student achievement in NSW and nationally. Particular effort has gone into lifting the achievement of students from low socio-economic backgrounds, most recently through the Low Socio Economic School Communities National Partnership and the Higher Education Participation and Partnerships Program (HEPPP).

The focus in our schools is on high expectations for all students, ensuring that all students are achieving to expected standards, and recognising that the key to successful progression to further study in senior schooling and beyond lies in academic readiness.

While access and bonus point schemes are a valid equity measure when used to compensate for disadvantage suffered by capable students, the most effective intervention to promote low-SES student access is to raise their school achievement.

There is a danger that access and bonus point schemes and lower university entry standards that are evident for a range of courses, can work against efforts to lift achievement in Year 12 by sending a signal that lower achievement will be accepted. An outcome where educational deficits that need to be addressed at the school level are transferred to the higher education sector should be avoided.

As a general principle entry standards should challenge school students wanting to transition to higher education to maximise their achievement. Without that challenge efforts to improve school achievement, especially for students from low-SES backgrounds, can be undermined.

Greater emphasis needs to be placed on aligning expected student achievement in senior secondary school with academic expectations of university study. A more collaborative approach across schooling and higher education is required.

## **Role of Ministerial Council**

Direct consultation should be undertaken with the COAG Education Ministerial Council on the issues covered by this consultation, which lie at the interface between schooling and higher education.

The Council deals with national policy for early childhood and schooling and also includes consideration of tertiary and higher education issues in its scope.

It is especially important to engage directly with the Council because of the integral link between school performance, and transition to and success in higher education.