



**Professor Debra Henly**  
*Deputy Vice Chancellor (Academic)*

Nathan Campus, Griffith University  
Nathan,  
Queensland 4111 Australia

Telephone +61 (0) 7 3735 5447  
Facsimile +61 (0) 7 3735 7507

[www.griffith.edu.au](http://www.griffith.edu.au)

Secretariat  
Admissions Transparency IWG  
C50MA7  
GPO Box 9880  
Canberra ACT 2601

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Dear Professor Krause,

Thank you for the opportunity to respond to the Draft Admissions Transparency Implementation Plan on behalf of Griffith University.

Our response to the feedback questions is set out below.

**1. Is the proposed approach likely to be effective in increasing transparency and public understanding of how contemporary admissions to higher education work?**

The proposed approach is a positive step towards increasing transparency and public understanding of the admissions process. Griffith, and QTAC already provide detailed admissions information; this approach will therefore represent an extension of already good practice at the university and state level to a national framework.

Griffith University is, and will continue to work closely with QTAC to ensure an accurate alignment of data, but the short implementation time frame runs the risk that institutional and QTAC publications, which will be circulated later this year may generate confusion amongst applicants.

It will be important to ensure that the information provided to the general public is clear, terms and language used are well understood, and the data provided by individual institutions aligns with that provided by the TACs. To this end, there may be value in conducting market research with key stakeholder groups (i.e. parents of Year 12s, TAFE students, School Guidance officers) to test some of the assumptions upon which the new approach is based. This would be particularly beneficial in relation to proposals around the Grouping of Applicants (p. 28-30) and how readily these groupings are understood, and are of value.

While this might extend the implementation timeframe, it would provide evidence for the validity of the approach and ensure investments in the new framework and associated systems are sustainable and well made.

**2. How achievable are the proposed implementation timelines, including commitments to deliver a 'best endeavours' version of the proposed information sets to inform students applying to enter study in the 2018 academic year?**

The timeframes for implementation in 2017 are problematic.

'The best endeavours' version is a stop gap solution while the TACs prepare an agreed suite of standard reports with consistent content and presentation on admissions. HEPs are being asked to invest time and resources to produce a temporary version of the proposed information sets for use from July to September 2017, with the possibility of significant future changes. This is not efficient from the university's perspective and is likely to cause significant confusion amongst applicants and the general public.

The on-time closing date for Queensland applications through Queensland's TAC is 30 September 2017. Thus, a requirement for HEPs to publish on their websites information consistent with Appendices B and C by August 2017 will be of limited value to particular applicant cohorts seeking entry in 2018, particularly school leavers and/or those considering a trimester 3 2017 entry at Griffith (October). The timing of major forthcoming annual recruitment events such as Open Day and Tertiary Studies EXPO would precede this information becoming publicly available on university websites in some cases.

It therefore calls into question the benefit of having a potentially incomplete admissions information dataset for 2018 entry for such a short time before applications close. Griffith believes that it would be more valuable to roll out an agreed, coordinated single information set for mid-2018 or 2019 admission, rather than early 2018.

**3. If there would be difficulty in delivering the commitments proposed, what could be changed to make them achievable?**

Consistent and timely implementation will depend on the preparedness of the sector to agree on any proposed new terminology and the common data sets. Secondary considerations revolve around institutional commitment and capacity to extract and publish accurate information in tight time frames, combined with and affected by considerations of internal data quality and system flexibility.

TACs and institutions will need to report information in a common and prescribed form to avoid duplication of effort in reporting or accuracy/consistency of reporting. Institutions will be relying on TACS, who are the repositories for authoritative admission data, to certify and deliver consistent data ensuring all institutions are reporting the same baseline data.

Given the difficulties in achieving all of this by August, it would seem prudent to aim to ensure data currently collected and made available to prospective students is as accessible as possible, but to concentrate institutional efforts on delivering the required additional information during 2018.

**4. Do you have any comments on the proposed four broad groupings to describe the basis of admission for applicants to higher education?**

Moving from two broad categories (School Leavers and Non School Leavers) may in fact make higher education admissions more opaque to the public. Adoption of an evidence-informed approach by undertaking market research on the validity of these categories with relevant stakeholders would strengthen the basis for their use. Many prospective applicants will not self-identify as any of these grouping, or may see them differently. For example, applicants who left school 3 or 4 years ago may see themselves as having recent secondary education, rather than work and life experience. Specifically:

- a. Recent secondary education – could be more clearly specified as recent **senior** secondary education
- c. Previous vocational education and training (VET) study – clarification is needed for those students who include a VET qualification obtained while at school, which in Queensland will be included in the calculation of ATAR scores.
- d. Work and life experience – this category is insufficiently defined to be useful for a prospective applicant. It would benefit from greater clarity about the informal and non-formal learning that may contribute to life experience or work experience.

**5. Do you agree that the proposed approach to Australian Tertiary Admission Rank (ATAR) thresholds is reasonable (i.e. replacing the use of the terms “cut-off” and “clearly in” with functional terms describing the lowest ATAR made an offer in the relevant period?). What issues or difficulties, if any, might this raise?**

Griffith supports intent to increase consistency of language and to provide clarity around definitions. The redefinition of ‘cut-off’ as ‘the lowest ATAR for entry at the end of all offer rounds’ is supported. However, in a university which has actively moved to a trimester academic year and is now moving toward continuous offers as the standard, what is meant by ‘end of all offer rounds’ becomes significant and likely to differ between institutions with different calendar cycles, points of admission and offer cycles.

We disagree that ‘bonus points’ should be replaced with ‘adjustment factors’. The definition of ‘adjustment’ means **a small alteration or movement made to achieve a desired fit, appearance or result**. This can imply an even more interventionist bias than the term ‘bonus’, which may be defined as **a reward for good performance**. For example, subject bonus ranks are clearly an area where good performance is being recognised and the term bonus is actually a more relevant and useful.

The various state-based TAC’s could have a valuable role to play here in harmonising definitions.

**6. Do the proposed “information sets” meet the need identified by the Higher Education Standards Panel for comparability of the information available from different providers about the requirements to be admitted to study at each institution and each course that they deliver?**

Yes, helpful amendments have been made to the proposals initially circulated and the provision for optional information is also appreciated. It remains unclear why international student numbers would be reported in a domestic undergraduate data set.

**7. Does the proposed approach set out in the draft implementation plan adequately inform prospective students about admission options or pathways that do not use ATAR? If not, how might this information be improved?**

It may be valuable to undertake market research to validate the assumptions upon which some of the framework and definitions are based. This will be particularly important for the majority of students who do not enter university through an ATAR/OP pathway.

**8. Any other feedback you wish to provide on the draft implementation plan and the commitments it outlines is very welcome**

There is a mismatch in the implementation timeline between the requirements for HEPs to provide standardised information by August 2017 and the requirement for TACs to produce an agreed suite of standard reports with consistent content and presentation on admissions by the beginning of 2018. HEPs may invest time and resources in extracting and publishing information which is required by September 2017 for people seeking admission in 2018, but that may subsequently found to be inconsistent and/or misleading when TAC data and other institutional data is made available.

If authoritative TAC data sources are not used to populate both institutional websites and national information systems, there is a risk that comparisons will be inaccurate and misleading for applicants, thereby undermining the intention of the HESP in introducing this initiative.

There appears to be no provision for consultation with the sector and particularly local practitioners, on the effectiveness of the proposed approach and particularly the operations and performance of the proposed national information platform. This could usefully be undertaken during 2018.

Given the complexity of the data requirements, the lack of validation of a number of the core concepts underpinning the proposed new arrangements, the potential costs of the implementation and associated infrastructure and the reputational impacts for the sector if published information sources are not absolutely aligned, consistent and accurate, suggests that it may be advisable to extend the implementation timelines to protect public confidence in the new framework.

Kind regards



Professor Debra Henly  
**Deputy Vice Chancellor (Academic)**