

12 May 2017

Chair
Admissions Transparency IWG
C50MA7
GPO Box 9880
Canberra ACT 2601

HIGHERED@education.gov.au

Office of the Deputy Vice-Chancellor
(Academic)
Deputy Vice-Chancellor (Academic)
Professor Joanne Wright
Joint Honours Kent MLitt Aberdeen
PhD ANU GAICD D17/49962
CRICOS PROVIDER NUMBER 00025B

Dear Professor Krause

Consultation Draft: Improving the transparency of higher education admissions

At The University of Queensland, we reiterate our support for admission requirements and standards that are clear to prospective students, so that applicants are able to easily access the information they need to make informed choices about university study.

We appreciate the opportunity to provide feedback on the consultation draft and, in addition to our endorsement of the Go8 submission, offer the following brief responses to the consultation questions:

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

The University of Queensland is broadly supportive of the proposed approach and believes that it will aid in public understanding of admission into higher education. In particular, the adoption of a common vocabulary, over time, will assist potential students and their families in comparing 'like for like' across institutions and jurisdictions.

The effectiveness of the proposed approach may be lessened given the timelines outlined in the consultation draft (see also our response at Question 2). Universities have already published their admissions guides for 2018. With so much information already published, there is the potential for confusing applicants and parents by changing admissions language 'mid-stream' (replacing 'cut-off' for example). This approach must, at the least, be accompanied by a broader awareness campaign for the community, and not left solely to institutions to manage. Guidance Officers, students, University and TAC staff will need time to adjust to the new language and to ensure we are all communicating it to the market for a lead-in period as well as publishing it in various hard-copy and online formats. There must also be clear and timely mechanisms for educating those giving advice in the Secondary School system, as well as some prior 'robustness' testing of the proposed terms with prospective students, parents, and advisors.

Pages 7 and 15 – Access to careers advice is crucial to the success of any moves towards greater transparency underpinning student retention and success strategies.

The impact of greater transparency for prospective students also needs to be tested among future university students to understand that more information is actually useful for student decision-making.

- 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 timelines and resourcing required to implement these are of concern for UQ. The timelines are extremely tight; the August deadline for implementation of publications will be a major undertaking. There will be a significant amount of work needed to update the [UQ Future Students](#) website to include the information outlined in Appendix D. We will also need to set up some form of template/document generation process for May 2018 when we will be required to submit this information to the 'national admissions information platform' and that will have resourcing implications.

Many institutions will have already finalised publication materials in 2017 for 2018 (for example, [Tertiary Prerequisite and QTAC Guide](#), and [UQ Undergraduate Prospectus for 2018](#)) so there is a lot of redundant work being requested here. Effort is also variable across the sector depending on the range of offerings and the 'comprehensiveness' of the institution. Systems in place to support quality assurance, marketing, and publishing efforts would need fine tuning, meaning a 'best endeavour' approach may still be challenging, and the outcomes across the HE sector may therefore be uneven which poses some risk to the aim of achieving transparency and consistency.

We would also be concerned about this effort happening in parallel with a broader program of compliance work universities must now prepare for due to the Higher Education Reform Package, recently announced by the Minister, as well as GAMSAT consortium members dealing with significant transition arrangements to a new provider.

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

Our strong preference would be to wait until the ATAR is operative in Queensland (which will be for Queensland students commencing Year 11 in 2019, graduating from the end of 2020 and seeking entry to tertiary courses from 2021). Although the templates provide for UQ to continue using OP scores until the ATAR is brought in, the concern would be that interstate applicants will not be able to directly compare QLD institutions with institutions in their home state and this might disadvantage Queensland Universities. (See also our response at Question 6 regarding the direct comparability of the 99-band ATAR and 25-band OP score.)

If this is not achievable, implementation in 2018 for 2019 applicants would allow time for HE providers to ensure publications and advice are consistent for the incoming cohort and a more comprehensive awareness campaign is able to be carried out. An additional option would be to focus efforts on standardising what is already available through TACs.

4. *Do you have any comments on the proposed four broad groupings to describe the basis of admission for applicants to higher education?*
 - a. *Recent secondary education*
 - b. *Previous higher education study*
 - c. *Previous vocational education and training (VET) study*
 - d. *Work and life experience*

We would consider that an enabling course is not higher education and this sub-category should be moved from Group b to a renamed Group c. We also assume that this will not include those applicants who have undertaken enrichment or advanced studies (i.e. secondary school students undertaking single tertiary level courses at a HE provider, effectively as a non-award, that may or may not contribute to credit in the future). A bridging course may or may not be higher education. There needs to be consistency across the groups listed on pages 29, 36, and 41; our preference is an amended list as per page 29.

It would be useful to provide guidelines and detailed examples of how to categorise student types.

Page 38, Appendix C – does the item on *Bridging and enabling courses* refer only to institutional programs or include referral to other options?

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?*

UQ's view is that *Lowest ATAR* is potentially misleading. Subject to testing with prospective students, the key piece of information for someone contemplating tertiary studies, is lowest ATAR where the course was successfully completed. In other words, a student who enters a course on the basis of lowest ATAR from the previous year and then finds out students do not complete successfully at that ATAR could have a case for misleading advertising.

We also disagree that *'Bonus points' carry a hint of undeserved advantage*. Sometimes they are exactly 'bonus points' for having successfully studied a language or advanced maths. Adjusted ATAR is more applicable to situations where there is evidence such as remoteness or low SES. Bonus points and adjusted ATAR are different, and Universities may well want to give bonus points to incentivise prospective students and create the sort of student base that serves their mission etc.

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?*

Terminology requirements and templating, as set out in the Appendices, need to consistently account for non-ATAR (QLD) institutions. References are not consistent so perhaps a catch-all statement that *wherever ATAR appears, read OP as appropriate.*

Page 33 – Early Entry schemes may not just be for School leavers so the terminology of ‘At School offer scheme’ seems exclusive of other cohorts. A HE provider may have an arrangement with a vocational provider for example.

One Queensland-specific concern regarding presentation of ATAR/OP information at the course (program) level relates to use of secondary indicators to determine admission to a program, such as Medicine. Listing only the blunt ATAR/OP is not the most transparent information and could actually be misleading. When Queensland moves to the ATAR, this will obviously solve the problem, but there will need to be clear guidelines for the interim period.

Page 29 *Completion of some or all of a higher education qualification* – need to clarify that applicants with higher education will be assigned to Group b on the basis of at least 1 year FTE? (See also our further comments at Question 4.)

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?*

Page 6 *Access to clear information relating to admissions requirements and various entry pathways is to be made available to all applicants equally.* – as stated in our response to the consultation paper *Transparency of Higher Education Admissions Processes*, “[w]e believe that previous academic performance at school is the most suitable measure by which to select school leavers for university level studies and we are concerned by the growing trend towards selecting school leavers for university on the basis of other qualifications”. We should not do anything that dis-incentivises school students from finishing Year 12 with as good an ATAR as possible. This point was much emphasised during the Queensland Review of senior assessment and the lesson from Queensland where fewer than 50% get an OP is salutary here. We think there should be a principle that suggests admission to university should not undermine finishing school.

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

Page 8 – the inclusion of *campus facilities, student life, social and sporting facilities, etc.* seems extraneous to admissions. Universities would likely already have this information elsewhere on their websites so it seems unnecessary here.

Page 11 *Instead a mechanism will be developed to direct applications for selected interstate course options at higher education providers that are members of another tertiary admission centre to the relevant jurisdictions for consideration, with reduced complexity and cost to the applicant.* – more detail is needed here, given that costs, even if they are marginal, will need to be covered. With many universities doing more direct entries, the fixed costs of the TACs fall increasingly on fewer providers (at least in QLD where charges are based on volume of applications). It would not seem fair or reasonable for State TACs (and their member Universities) to subsidise applications to interstate Universities, so more detail is needed here.

Page 12 – does the reference to “tailored responses” and acknowledgement that “there is no ‘one-size-fits-all’ solution align with the need for consistency and standardisation of information?”

Pages 36 and 41 – we are unclear on the reasons for listing international student numbers as being relevant to admissions. If this is required, we would prefer to use percentage (%) figures only as actual numbers will require a considerable amount of context to be built around them for public consumption otherwise they could be misinterpreted and/or have potential to misguide or even confuse the reader. This information could also have unintended impacts in the way applicant choice is influenced, i.e. based on domestic vs international cohort figures, or small numbers in programs (courses) may be construed that a program (course) is undesirable.


Pages 37 and 38 – with respect to Bridging or Enabling courses, Queensland has specific schedules that apply for all applicants (other states have vastly different entry mechanisms between Year 12 and non-Year 12 whereas we apply a QLD rank to everyone), but the volume of this is quite large and may confuse and/or mean nothing to the reader.

Page 40 *Students selected on the basis of special consideration should not be included in this table* – it is unclear where these applicants should be reported, if at all. If these students are exempted from our statistics, are they grouped together under the relevant special consideration pathway? Any information about special consideration also needs to be contextualised with clear understanding about what that means, otherwise it potentially creates another opaque ‘bucket’ to put students into.

We trust this information will be useful to the Working Group’s deliberations. In recognition of Queensland’s current stance as a non-ATAR state, we would welcome the opportunity to provide further comment on any revised draft. We would also recommend that representation from Queensland is included in any implementation group.

If you require any further information or clarification, please contact my office (email dvca.office@uq.edu.au or telephone 07 334 67754).

Yours sincerely



Professor Joanne Wright
Deputy Vice-Chancellor (Academic)

Copy: Director, Academic Services Division & Academic Registrar