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12 May 2017

Professor Kerri-Lee Krause
Chair, Admissions Transparency Implementation Working Group

To be emailed to: HIGHERED@education.gov.au

Dear Professor Krause

Thank you for the opportunity to provide feedback on the draft Admissions Transparency Implementation Plan. La Trobe University supports the goals of achieving greater transparency regarding admissions processes, revised ATAR-related thresholds and definitions, common terminology and reporting requirements, improved access to and comparability of information, and enhanced accountability of providers.

The University is concerned that the timeline is tight, with a number of key dependencies. There is a potential danger of confusion between already published printed material for the 2018 admission round and subsequent course templates published on the web.

The University's brief response to each of the consultation questions is provided below.

Queries may be directed in the first instance to Robyn Harris, Executive Director, Planning and Governance (robyn.harris@latrobe.edu.au).

Yours sincerely



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cc Robyn Harris

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La Trobe University response to Admissions Transparency Implementation Plan Consultation Questions

May 2017

La Trobe University supports the intent for greater transparency regarding admissions processes and for common terminology and reporting requirements, improved access to and comparability of information, and enhanced accountability of providers.

The University recommends that the detailed requirements and timelines be further examined to ensure that an appropriate balance can be struck between speed of implementation and ensuring the suitability and accuracy of information provided.

1. Is the proposed approach likely to be effective in increasing transparency and public understanding of how contemporary admissions to higher education work?
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In general terms, a move toward greater clarity and comparability of information is an important step forward. The University agrees that the initial focus of the work should be to support prospective domestic undergraduate student choice. La Trobe also supports the principles outlined in the paper including that improved transparency of higher education admissions should not add unnecessary regulatory red-tape.

The University recognises the 'best endeavours' approach and the intent that 2017 will be regarded as a trial to help identify any operational issues, leading to refinements in later years. The University would appreciate clarification of what 'best endeavours' actually means in the context of meeting requirements for performance-based funding as announced in Budget 2017.

La Trobe suggests that more time be devoted to careful consideration from an end-user perspective to ensure the right amount of detail is available in the most readable form. To ensure transparency and public understanding not providing too much complex information is important, as is avoiding duplication of information across multiple courses where one set of information is relevant to all (for example, the availability and breadth of student support services).

Poorly informed media reporting of entry-ATARs and cut-offs could lead to public confusion. In implementing these changes explicit consideration will need to be given to how they will be communicated and explained to the mainstream and higher education-specific media, so that their reporting on admissions-related matters can be as accurate as possible.

Until the national admissions platform is operational it is not clear how consistency across the TACs will be enabled, so that applicants across the country can see a common data and information format.

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 implementation timelines were very ambitious, particularly given the variability of quality of data and the way in which it is collected and analysed by various HE providers. This is particularly true for direct applicants where there is no consistent approach between providers in how these data are collected, managed or reported. The University notes that some non-university HE providers are likely to be particularly challenged in responding to these imperatives.

The proposed speed of implementation of these changes is a real risk to clear and high quality information for prospective students. The August 2017 implementation target will be difficult to achieve given that common definitions and terms are not yet available.

La Trobe will not be alone in having printed marketing and communications materials already in the market for the 2018 intake. While the new terminology could be introduced to all webpages more easily, the discrepancy between printed and online materials may itself cause some confusion for applicants. To avoid this, the aim should be to agree changes that can be implemented for the 2019 academic year. An alternative would be to take a phased approach, such as 2018 intake for changes to TAC and undergraduate course direct applicants, and 2019 intake for all including postgraduate.

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

The information proposed to be provided for each course (Appendix D) is a significant task for universities to generate within the proposed timeframes. An alternative approach would allow a common core of information about an institution to be provided once, with differential information statements for each course.

The timeline is dependent on having initial agreed common terms and definitions by June 2017. If this date slips it makes the August target for providers difficult to achieve. We suggest a review date in July to confirm timeline for providers.

We also suggest greater focus on communicating these changes to prospective students and their families, particularly in relation to:

- the concept of 2017 being a trial year
- the potential for differences between already published 2018 material and updated web course templates

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**

These broad groupings are reasonable and appropriate. We note that some mature age students could be categorised on one or more bases.

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?

La Trobe University broadly supports with the proposed ATAR-related thresholds and definitions.

The term “adjusted ATAR” is in one sense technically inaccurate. The ATAR itself never changes. Any adjustment factors such as bonus points actually modify the selection rank rather than the ATAR. Selection rank is likely to be more informative to potential applicants than raw ATAR.

The paper proposes that all higher education providers – universities and non-universities alike – will adopt a common approach to the provision of information including “where ATAR is an element of the application assessment, the minimum ATAR required, if relevant, and how any available ATAR-related adjustment schemes (e.g. bonus points or reduced thresholds) operate”. The University observes that in some instances, ATAR is not ‘required’ but is in fact an outcome of ranking a particular applicant pool, not a static number.

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?

The requested information adequately meets the stated goals of transparency. Given the importance of new common definitions and terms being applied consistently, it is suggested that case studies and worked examples from across all states and domains be available in June/July.

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 will be valuable to seek feedback from 2017 prospective applicants on how helpful the new course templates were for making their selection. We suggest that representative sample of applicants are surveyed in January so that timely feedback can inform the revision of the templates for the 2019 admission round (proposal for May 2018 date for full implementation)

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

No further comment
