

12 May 2017

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Chair
Admissions Transparency Implementation Working Group
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Dear Professor Krause

Please find attached advice on the consultation draft of the Implementation Plan developed by the IWG.

ACPET has appreciated the opportunity to engage with the IWG on this important work and acknowledges your efforts to reach out to all higher education provider representatives.

The need for greater admissions transparency is strongly supported by ACPET so that students are able to make the best decisions about their higher education studies. With some adjustments to timeframes to enable greater provider engagement, particularly, I am confident providers will use their 'best endeavours' to support the reforms.

Please contact Neil Miller on (07) 3210 1628 or by email: neil.miller@acpet.edu.au should you have any queries in relation to this advice.

Yours sincerely



Rod Camm
Chief Executive Officer

Improving the Transparency of Higher Education Admissions Consultation Draft Response

Introductory comments

ACPET members offer a diverse range of higher education courses with an equally diverse range of admissions processes. With most being small providers, without access to Commonwealth Supported Places and the infrastructure provided through Tertiary Admissions Centres, the capacity to provide relevant admissions and other information is pivotal to their success and that of their students.

The need for greater transparency was supported in ACPET's submission to the Higher Education Standard Panel's *Consultation on the Transparency of Higher Education Admissions Processes*. As well as supporting the need for greater clarity and transparency of admissions processes, ACPET's submission to the Panel emphasised the need to ensure the diversity of admissions processes was recognised so that students had the opportunity to make real choices. The focus could not be on ATAR arrangements alone.

Accordingly, ACPET welcomes the opportunity to engage with the Implementation Working Group (IWG) on the consultation draft of the admissions transparency implementation plan that responds to the recommendations of the HESP's report, *Improving the Transparency of Higher Education Admissions*.

ACPET also acknowledges the very short timeframes to develop the implementation plan. It is committed to supporting the IWG to bring forward a plan that leads to reforms that support students to make the best possible decisions about their future higher education studies.

Overall points on the Implementation Plan

The proposals outlined in the implementation plan consultation draft are consistent with the HESP's recommendations. Essentially, that is the use of consistent admissions information which is published on a dedicated platform that better enables some comparison by students.

While the recommendations will provide information in more consistent way, it is important to acknowledge there will be limitations to the ability to 'compare' provider admissions - at least in regards to non-ATAR processes. As ACPET's submission the HESP highlighted, private providers use a broad range of admission processes including interviews, auditions and evidence of relevant work experience, as well as 'indicative' ATAR scores. The use of final ATAR scores is very limited. It will be important to manage expectations of 'apples and apples' comparisons being possible and the development of a platform that seeks to 'force' uniformity at the expense of appropriately reflecting the diversity of admissions processes.

It will also be important that the scope of the reforms are clear (domestic undergraduate and sub-bachelor higher education courses) and that the absence of providers that focus on post-graduate courses or international students is not adversely misinterpreted as some provider shortcomings.

ACPET members have expressed concerns with the proposed timeframes for the roll-out of the new information sets and the platform to be developed by the Department of Education and Training.

The August 2017 deadline for providers to adopt new common admissions terminology and information sets on their web sites is very ambitious, even acknowledging the 'best endeavours' basis. This timeframe will not allow for providers to gain sufficient understanding of the required information sets, extract data into the required format and to make necessary adjustments to web sites, documentation etc. This is particularly true for private providers with a large number of courses and the detailed information requirements expected at course level.

Some members have indicated it will be too late to achieve consistency given 2018 admissions documentation has already been produced.

To support implementation by providers, there needs to be some structured engagement to detail and explain the information sets and other requirements along with the longer-term expectations and benefits for students and providers. This engagement with providers needs to be supported with relevant fact sheets and other collateral such as exemplar completed templates from a range of providers.

It will also be important that these information sets and broader processes are 'road tested' with students and other stakeholders, including high school counsellors, ahead of the roll-out. There is unlikely to be sufficient time to undertake wide consultation ahead of the proposed August 2017 deadline for the publication of the (draft) provider and course information sets.

It is important that the 'best endeavours' approach from August 2017 is mirrored in the approach adopted by TEQSA. It needs to be clear that TEQSA's monitoring of the reforms in the early phases is about understanding implementation progress and practice with a view to developing guidance notes, exemplars and other materials that support good practice and implementation - and not about audits and regulatory compliance.

ACPET's concerns with the proposed timeframe for implementation extend to the development of the platform that will provide the ongoing mechanism to support the transparency initiatives. Given the functionality of this platform is critical to the ongoing success of the transparency initiatives, it is very important that the time is taken to 'get it right'. Changes made will result in additional administrative costs for providers and a high risk of greater confusion to prospective students arising from changed information.

Concerns are held with the proposed process and timeframe to scope and have an 'initial pilot release' in late 2017 and ahead of the finalisation and endorsement of the information sets and other measures in May 2018.

ACPET recommends a revised timeframe, to allow an appropriate consultation period prior to agreement on the information and format by December 2017, with implementation then occurring from May 2018.

Comments on Initiatives

Standardised presentation of admissions information

The ATAR information in relation to lowest ATAR, lowest adjusted ATAR and minimum ATAR are useful. It is less clear there are benefits to students in including the percentile and median ATAR information. This level of detail also poses additional workload for providers and complicates information presentation. Some feedback indicates access to the full range of proposed ATAR data may also be problematic.

A greater challenge is likely to be the ability of institutions to recast their existing data sets to align with the proposed student cohort numbers and percentages data requirements.

Once the platform is in place, it will be important that providers are still able to present (in design, layout etc.) their admissions information in ways that align with other corporate presentations and materials.

As note earlier, the August 2017 timeframe for implementation will be a challenge for some providers especially where there are multiple courses, the need to present data in a different format, and significant changes required to websites etc. Advice from some members indicates that documentation, web sites and other materials to support their 2018 admissions are already printed and in place or being finalised. To then require different material to be produced using different terminology poses a risk of confusion for prospective students, their parents, high school counsellors/advisors and admissions staff.

ACPET submits that it is preferable that there is time for engagement with the sector to explain the reforms and garner ongoing support and feedback ahead of the finalisation of information sets by December 2017, implementation from May 2018, and progress reporting by TEQSA from mid-2018 onwards.

Adoption of common admissions terminology

The four groupings of applicants (recent secondary education, previous higher education study, previous VET study and work and life experience) are logical and generally align with current experience. The need for a hierarchy to assist where applicants may have multiple previous educational (and workforce) outcomes is supported. Guidance material will need to include advice on this (especially for applicants).

As with the timeframe for the presentation of standardised information in August 2017, similar concerns are held regarding the lack of any time between the endorsed final terminology and its adoption (both May 2018). Some earlier agreement on the final terminology would enable appropriate communication with institutions. Ideally this should be completed by December 2017.

Revised ATAR-related thresholds and definitions

No major concerns have been identified with the ATAR definitions or presentation. They respond to the fundamental concerns identified by the HESP. As noted earlier, the value of presenting more granular data (percentiles etc.) is not apparent and warrants reconsideration.

Tertiary admissions centres to adopt more consistent approaches and reporting and streamline interstate application processes

While ACPET members do not have significant interactions with TACs, the proposals to produce standard reports aligned to the agreed terminology and ATAR data sets is welcome.

TEQSA monitoring and guidance on improved admissions transparency

The need to cater for the diversity of providers in TEQSA's support for the reforms, and particularly the guidance to assist all providers, "all types, scales and sophistication" to engage with the reforms is noted and supported. So too is the recognition that TEQSA guidance to assist providers recognises there is no 'one size fits all' solution.

As noted earlier, TEQSA needs to ensure a compliance approach is not adopted during the period leading up to final approval of templates, terminology and delivery platform. At the same time, however, there needs to be clarity around when "effective compliance" is required. It is unclear from the draft plan.

TEQSA also needs to be clearer around the purpose of proposed draft guidance note and arrangements for any final guidance note/s. As noted above, it is suggested that an amended timeframe be proposed so that progress reporting by TEQSA occurs from mid-2018 onwards (following implementation May 2018).

National admissions platform

While the importance of the information sets and terminology is acknowledged so too is the need to ensure the platform development is fit for purpose.

The plan indicates the platform will be developed "based on research which examines how students use current services." It is important there is also engagement with the range of providers (by size, industry/field of education) so that the diversity of admissions information can be presented/accessed and the no 'one size fits all' principle is preserved.

There would appear to be insufficient time proposed to undertake the initial scoping study, with no reference to engagement with providers.

It is unclear how any changes to the final requirements (terminology, information sets etc.) in May 2018 will be reflected in the platform implementation given the initial pilot release occurs in December 2017.

Some concerns are held with what appear to be a parallel process for the development of the platform. While some work on scoping the platform can proceed this work should not be finalised ahead of the pivotal work that should guide its development. As noted above, there is a concern that the initial pilot release, presumably followed fairly quickly by further releases once other aspects are finalised, will add to confusion for providers, prospective students and other stakeholders.