

Improving the Transparency of Higher Education Admission Consultation Draft – May 2017

JMC Academy's Response

Introduction

The JMC Academy is a non-university higher education provider that has been delivering courses in the creative industries for 35 years. While many of these courses began as vocational qualifications, the JMC Academy has been delivering higher education qualifications since 2005 with campuses currently in Sydney, Melbourne and Brisbane.

Consultation questions

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

The JMC Academy supports the need for greater clarity and transparency of higher education admissions across the sector and welcomes the acknowledgment by the IWG of the importance and relevancy of non-ATAR admissions.

It should be noted however that there may still be some challenges and limitations in achieving a true comparison across institutions that use non-ATAR processes. For example how does an audition or portfolio assessment at JMC compare to that of another institution? That said this would be almost impossible to standardise and would only be a relatively minor limitation when compared to the potential upsides of its implementation.

The JMC Academy does seek some clarity around what AQF levels this will cover. While it is implied that this relates to bachelor courses, the JMC Academy offers higher education courses at Diploma and Associate Degree levels and is unclear as to whether the reporting would apply to these as well.

Further to this, should sub-bachelor courses not be included and universities, as a consequence of higher education reforms (subject to being approved), choose to promote these awards more actively then there is potential for the confusion around admissions standards to be shifted to the lower AQF levels thereby diminishing the effectiveness of this initiative.

- ***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 JMC Academy has concerns around the proposed implementation timelines and the 'best endeavours' approach. The concerns are not necessarily around the format and type of

information but more so in the time and resources that will be required to retrofit the data. A large majority of NUHEPs are outside of the TACs and therefore having much of this data readily accessible and tabled by August 2017 would be a challenge. As in the first instance it is only a 'best endeavours' approach there is also a risk as to the true accuracy of the data from some institutions having to chase a deadline, possibly impacting on the purpose of this initiative.

With additional time organisations can prepare their staff, systems and where required amend processes and procedures for future intakes to ensure they are capturing this data from the outset.

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

Our recommendation is that the implementation be delayed and rolled out properly in 2018 after all due consideration is given to the feedback received through the consultative processes and after the comprehensive set of admissions terminology has been endorsed.

The 'best endeavours' approach while attempting to ensure that the marketplace is provided with clearer admission information there is no guarantee with regards to its accuracy nor its consistency across providers should this be rushed. This would counter what is meant to be achieved and may lose the confidence of the very audience that it is trying to benefit.

A delay in its implementation will certainly provide time for many institutions to review their systems and data capturing processes in order to be readily prepared to accurately report in the future.

Should the decision be to still proceed with a 'best endeavours' approach then we would suggest culling the templates for this year to only include the most important and relevant information required. This will reduce the administrative workload in the short-term while still providing the public some clarity as to admissions. This will also allow the opportunity for the templates to undergo some additional scrutiny not only by the sector but also the end-users such as students, parents/carers, careers advisers etc. with a view to expanding these out in 2018.

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

The JMC Academy believes that these four broad groups for the initial implementation phases are adequate. As institutions begin to use the groupings minor issues may be identified during the classification phases, however this could be remedied through guidance notes, FAQs etc.

We therefore believe that the highest and lowest ATAR is sufficient.

- ***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?

While the JMC Academy agrees that there is a need for consistent and clear terminology to be used across the sector we do raise concerns with regards to the proposed timelines. The fact is that the sector will be required to work with a set of initial common terms for a ‘best endeavours’ version which may or may not change when endorsed in 2018. Should circumstances subsequent to the consultation determine that the common sets be changed there is a risk that the public perception as to the value of this exercise be compromised.

- ***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 main issue we have with the proposed information sets is that the value of including ATARs in percentile bands is relatively unclear. The proposed requirement to table this information not only adds an unnecessary administrative burden to the institution but there also does not appear to be any true benefit to the end-user in making a decision. From our perspective this would be a very time consuming process without a clear correlation as to what it is trying to achieve. We therefore believe that the highest and lowest ATAR is sufficient.

There will be no doubt more acceptance, from both within and outside of the sector, the less complex these tables are.

- ***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?***

The JMC Academy agrees with this approach and in the first iteration does not have any recommendations for improvement. As mentioned earlier it will still be difficult for clear comparisons between institutions providing non-ATAR entry however there should be enough information made available to students on the requirements and expectations through interview, website, portfolio examples as well as institutional reputational information in order for students to make an informed choice.

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

While it may be tempting to use this as an opportunity to capture additional information we believe the more complex and burdensome this becomes the less acceptance and usability it will have.

It is imperative that for this to succeed that it remains focussed on the initial recommendations and key priorities when determining the rollout phases and the format of the data required. It needs to be relatively easily and accurately created by institutions and more importantly even easier for it to be interpreted by the end-users.