

SUBMISSION IN RESPONSE TO THE DRAFT IMPLEMENTATION PLAN

15 May, 2017

INTRODUCTION

Universities Australia (UA) welcomes the opportunity to comment on the Draft Implementation Plan released by the Admissions Transparency Implementation Working Group (the IWG).

UA strongly supports the objective of making university admissions information more transparent, and easier to understand. We believe that the Draft Implementation Plan developed by the IWG is a sound basis for improving provision of accessible and consistent information to prospective students and to the community generally.

While it is important to make a start as soon as possible, implementation must have regard to assuring durability, usefulness and effectiveness from the prospective student's perspective, and short-term provider systems capability and practicality.

It is very common to incorporate a 'pilot' phase into the process for implementing new reporting and administrative requirements resulting from Government policy change. The process for measuring engagement and impact is a recent example. Taking account of the timeframe needed to finalise the information template for use by those considering enrolling in 2018, 2018 could most usefully be considered as a 'pilot' year. We commend this approach as a means for ironing out any problem areas and conducting student-facing market research on usefulness and design. It would also provide time for universities to re-adjust their systems where this is required for full compliance.

Applications for university enrolments open in spring, and universities and Tertiary Admissions Centres (TACs) finalise information for applicants well in advance.

There is a risk that implementing elements of the plan too early may duplicate available information resulting in further confusion among prospective students, thereby making further development of the transparency agenda more difficult.

UA supports the IWG's 'best endeavours' approach to implementation in 2017 and 2018. At a minimum for this first phase of implementation, universities could:

- publish information on the previous year's admissions, by primary basis of admission, and by raw and/or adjusted ATAR where this is appropriate;
- publish the whole of institution information state, including general information on admission pathways and criteria;
- undertake a trial run of improvements set out in the draft implementation plan to examine and assess the implementation issues and timeframes, in order to be ready for full implementation in 2018-19.

UA looks forward to working with the IWG to develop a practical and feasible approach to commencing implementation in 2017-18, that lays the groundwork for a further development in 2018-19.

We address the consultation questions below.

IS THE PROPOSED APPROACH LIKELY TO BE EFFECTIVE IN INCREASING TRANSPARENCY AND PUBLIC UNDERSTANDING OF HOW CONTEMPORARY ADMISSIONS TO HIGHER EDUCATION WORK?

In the long term the proposed approach will lead to a more transparent admissions process. It will be important to design implementation in a way that minimises confusion arising from changes to terminology and established practices. In particular, 2018 initiatives will need to be designed carefully, not only to avoid adding further complexity to the admissions information environment, but also to ensure that genuine progress is made in time for full implementation for the 2019 student cohort. The long-term success of the initiative will depend upon universities' commitment and ongoing consistency in adhering to the requirements of the admissions transparency agreement. This is already recognised by the inclusion of the TEQSA CEO on the IWG and in the recommendations for TEQSA provided in the HESP report.

HOW ACHIEVABLE ARE THE PROPOSED IMPLEMENTATION TIMELINES?

While it is important to make progress for students commencing in 2018, UA advises that the IWG and the Government will need to be realistic and pragmatic about how much can be achieved over the next three months. The key objective should be to begin a smooth transition to the new system envisaged by the Draft Implementation Plan for 2019 and beyond.

It should be noted that most universities have already begun printing their 2018 student handbooks and other admissions material. The TACs are also in the process of preparing information in time for use in the third quarter of 2017. It is considered too late for making substantive hardcopy changes and, therefore, confusing if on-line changes were to be made that are not consistent.

UA welcomes the draft plan's reference to 'best endeavours' in 2017 for the 2018 intake. We note, however, that participation in the admissions transparency agenda will be the first criterion for access to performance funding from 2018, should the higher education package be legislated. The precise requirement for access to performance funding in 2018 is not yet clear. UA is encouraged by references to a 'flag fall' approach for the first year. An unduly prescriptive and hasty requirement for 2018 would not be in keeping with the principle of 'best endeavours' and, without trial, would be likely to lead to a less than optimal outcome.

WHAT COULD BE CHANGED TO MAKE THEM ACHIEVABLE?

UA notes that full implementation is expected for 2019.

Rather than 'go live' in 2017, UA recommends that the first year (2017-18) be used to trial and test various information set options, as well as the utility and comprehension of suggested terminology. This will ensure that material prepared in 2018 for a 2019 start will be fit for purpose, coherent and reflective of community needs and expectations. It will also enable universities, TACs and government to promote the changes to minimise potential confusion or misunderstanding of what the changes are and mean.

COMMENTS ON THE FOUR BROAD GROUPINGS OF APPLICANTS?

The four groupings reflect the major groups of prospective students.

While reporting of previous years' admissions sort students into mutually exclusive categories, based on primary basis of admission, information for students should be presented in a way that acknowledges that many students will fit into more than one category.

IS THE PROPOSED APPROACH TO ATAR REASONABLE?

The suggested changes to the usage of ATAR and its terminology are sensible.

UA urges caution around overly abrupt changes to public information on ATARs. There are many prospective students already in the admissions pipeline and universities are already preparing admissions material for 2017 that uses the current terminology.

DO THE INFORMATION SETS MEET THE NEED IDENTIFIED BY HESP?

The proposed information sets meet the need for transparency recommended by the HESP.

The information sets do, however, include some extraneous and unnecessary elements, which are not relevant to admissions requirements and should not be included here. These are:

- data on international students when the audience is domestic students.
- information on how to apply and on enrolment in the institutional set
- financial assistance
- student and campus services

Universities noted that the creation and, especially, maintenance of these information sets, especially the course-specific set, will be onerous. It will be vital to ensure that information sets are updated at least annually. This is another strong argument for limiting the information sets to that information that is essential to prospective students seeking to understand:

- what they need to get in; and
- whether they are likely to be successful if they apply.

While URL links could be provided, all other information at this stage should be a matter for universities or other guides and platforms.

DOES THE PLANNED APPROACH ADEQUATELY INFORM PROSPECTIVE STUDENTS OF THEIR AVAILABLE PATHWAYS?

UA believes that the planned approach is informative.

However, informative volume is not necessarily the same as usefulness. Information must be clear and simple to ensure accessibility to an audience that has little or no knowledge of the higher education sector and university admissions.

From a practical point of view, information will have to be presented in a way that is accessible on mobile devices.

Recommendation

That the IWG:

- Continue to progress the development of the Implementation Plan;
- Adopt the solution proposed above to the first phase of implementation in 2017-18, namely:
 - Require universities to publish information on the previous year's admission, by primary basis of admission, and by raw and/or adjusted ATAR where appropriate;*
 - Require universities to publish the whole of institution information set, including general information on admission pathways and criteria;*
 - Allow universities to undertake a trial run of improvements set out in the draft Implementation Plan to examine and assess implementation issues and timeframes, in order to be ready for full implementation in 2018-19.*
- Use learnings from the 2017-18 pilot to optimise plans for full implementation in 2018-19.