

University of Sydney submission to the joint higher education sector and Australian Government draft implementation plan on improving the transparency of higher education admissions

12 May 2017

The University of Sydney supports, and is grateful for, the Implementation Working Group's efforts so far to develop a plan to implement the recommendations of the HESP's 2016 report on improving the transparency of higher education admissions. We provide these broad comments as our key points in response to the draft implementation plan as it currently stands, and would appreciate further opportunities to make comments as the plan progresses, particularly in relation to the points we raise below. We have also had input to, and endorse, the feedback on the draft plan provided by Universities Australia and the Group of Eight.

Information sets

In general we share the view of other providers that the information sets are too detailed and that generic information provided elsewhere should be excluded. However, in the course information set, we **strongly support the use of percentiles for ATAR to receive an offer, as well as for reporting on the outcomes of past admissions where ATAR was a factor**. We believe that this format above all others allows students to most accurately assess their chances of being made an offer to a particular course with a given ATAR.

Draft terminology and data sets (pp.9-10 and Appendix B)

The grouping of applicants reflects current practice and should present few difficulties.

We suggest, however, that the term 'ATAR' should be reserved for offers made based on ATAR alone, and that **an alternative term should be agreed** to designate an index that is created when providers make any adjustment to a student's ATAR for admissions purposes. For example, it could be designated an 'AATAR'.

We note the IWG's acknowledgement that 'The ATAR itself never changes'. Yet currently, when considering a published or reported ATAR it is impossible to know whether it is adjusted or not, and if so, how. The area remains fertile ground for confusion and maximum clarity is required in the terminology and definitions.

We are concerned that the Working Group's proposal (p.30) to group students who receive offers based on the ATAR alone, with those offered places after some adjustment to their ATARs, will serve only to perpetuate confusion. It is **crucial for transparency that offers based on ATAR alone, and offers based on adjusted ATAR, are split** so that students can have clarity on whether they are likely to achieve entry to a certain course given their ATAR, their particular circumstances, and with each provider's different method of adjusting ATAR based on other factors.

The importance of making this distinction, in our opinion, cannot be overstated. Not only is it necessary for students to make informed decisions about their chance of entry to a particular course, but ensuring

that the data is split in this way in publicly available admissions information will in future provide valuable insights and information about the success of different cohorts of students once admitted into a certain course of study. The coherence and value of this body of data, and of the information that will be made available through QILT website, will be improved significantly by making this change to the proposed combined ATAR/Adjusted ATAR subgroup 'a' on page 30 of the implementation plan. **If this combined subgroup is to remain, reporting for offers as well as admissions should be on the actual ATARs achieved by students in the subgroup.**

For all categories of applicants where ATAR is relevant to the admission process, we agree that information about the ATAR distribution should be presented.

Timelines

Some aspects of the timelines for implementation are unrealistic, and it is possible that with further sector input, an improved timeline could be created which:

- allows more time for detailed work of developing information sets;
- allows greater lead time for the publication of marketing materials while **reducing the time allocated to the sector to agree terminology**, in order to meet early publication deadlines;
- allows time for national advertisement of the coming changes;
- sets a firm deadline for implementation instead of an initial 'best endeavours' period thus reducing potential confusion and reducing the regulatory burden of initial monitoring.

We suggest perhaps the timeline could be tailored towards a firm deadline of the 2019 Semester 1 application and admissions period, noting that to achieve this, the deadline for agreeing terminology will need to be brought forward.

Red tape

A key outcome of the sector's involvement in the working group should be that the cost and administrative impositions resulting from the plan are proportionate to the benefits of the desired outcomes.

We would like to continue to highlight the importance of reduced regulatory burden and reduced duplication as features of the implementation of the HESP recommendations.

Providers should not have to report the same or similar data to different Commonwealth, state and territory agencies. Any new reporting must be to one central agency, against very clear definitions and requirements, which are reviewed and consulted upon annually. All other agencies, including TEQSA and state standards authorities (for Initial Teacher Education for example), can then access the data from that entity. If the new reporting requirements duplicate existing reporting elsewhere, the implementation plan needs to make it clear that this will cease.

TEQSA guidance

Finally, given TEQSA's role as laid out in the implementation plan, and additional funding allocated to the regulator in the Budget, we must state our firm view that the proposed TEQSA guidance note on admissions transparency will not have formal regulatory status. Moreover, TEQSA's increased monitoring of compliance with this implementation plan can have no formal bearing on an individual provider's regulatory status, except where they may be found to be clearly in breach of the Standards themselves.



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Legally, providers are required to comply with the Higher Education Standards - not TEQSA's interpretation of them. If the sector accepts implicitly or explicitly that the guidance notes have any status other than advisory, this will set a very regrettable precedent. If TEQSA believes the relevant Standard is no longer suitable, the Standard should be amended. TEQSA should not be allowed to enforce additional regulatory and reporting requirements through the publication of guidance notes.

Further consultation

Once again, we thank the Implementation Working Group for their efforts to improve admissions transparency while managing concerns of administrative and regulatory burden for higher education providers. We hope that the working group will give serious consideration to the points raised in this submission and those of UA and the Go8, and that we can be involved in further consultation to develop a reasonable implementation timeline and a set of information, definitions and groupings that achieve the genuine transparency that is the aim of the HESP recommendations.

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