

Professor Kerri-Lee Krause  
Chairperson  
Admissions Transparency Working Group  
E: [Kerri-Lee.Krause@vu.edu.au](mailto:Kerri-Lee.Krause@vu.edu.au)

12 May 2017

Dear Professor Krause

**Re: Draft Admissions Transparency Implementation Plan Released for Comment**

On behalf of the Council of Private Higher Education (COPHE) and its member institution, I acknowledge the tremendous effort and work undertaken by the Admissions Transparency Implementation Working Group (IWG), to develop the draft Implementation Plan.

COPHE appreciates the opportunity to present our preliminary comments to the IWG along with representatives from ACPET and TDA. As a representative stakeholder group our submissions identified five key areas of concern:

1. The significant workload implications of the Plan due to the tight timeframes, especially smaller institutions;
2. The importance of testing the information sets for rigour and validity;
3. The importance of institution level consultation to inform capacity for operationalising the draft Implementation Plan;
4. The importance of recognising admissions indicators such as interviews, as a valued and rigorous process and,
5. Concerns regarding the inclusion of non-admissions related information as an optional sub-set of the (whole of institution) standard information set.

In principle, COPHE considers that the objectives of the Implementation Plan are critically important to building and strengthening the Australian higher education sector, both for private providers and universities, through a national collective commitment to implement positive change.

COPHE endorses the Admissions Transparency Implementation Working Group's (IWG) process to improve the transparency of higher education admissions but at this stage, as a peak representative body for private providers, cannot endorse the Plan itself. The question as to whether the ambitious implementation framework included in the Plan is achievable will depend primarily on the capacity of institutions, and COPHE has not had sufficient opportunity to consult with members on this key issue.

With some amendment to timeframes and consultation with higher education institutions COPHE believes that the Plan can be operationalised in an effective, and timely manner.

If you would like clarification on any of the points in our submission, please don't hesitate to contact me.

Yours sincerely



Mr Simon Finn,  
Chief Executive Officer

## COPHE SUBMISSION TO THE ADMISSIONS TRANSPARENCY IMPLEMENTATION PLAN

The Council for Private Higher Education (COPHE) believes the draft Implementation Plan is an important step towards building and strengthening the Australian higher education sector through a national commitment to create transparent admissions processes and a collective responsibility to implement positive change. With this commitment and responsibility, comes **significant institutional and cultural change in how we, as the higher education sector, inform, communicate and make transparent to students, their families, their schools and other key stakeholders, the various ways to enter higher education studies**. COPHE members represent a diverse higher education community, from small niche providers to larger corporate institutions and universities, all of which adhere to principles of equity, diversity and choice. Transparency in admissions processes, if adopted by all higher education institutions, clearly aligns with and supports these principles.

In summary our key points are:

- The timelines are ambitious and need to be revised to take into consideration whole-of-institution change and whole-of-sector change;
- A clear and comprehensive communication strategy, including stakeholder engagement at the State and institutional levels, needs to be put in place to support the Plan;
- The admissions information sets need to be tested for rigour across the sector prior to being approved;
- Non-admissions related information – such as campus facilities and student support etc, should be provided elsewhere on the institution’s web site but not as an optional part of the ‘standard’ information set, and
- Admissions indicators that do not rely on ATAR, such as interviews, need to be valued as a rigorous process in themselves for our diverse student cohorts.

The suggestions and questions below are aligned to the objectives of the consultation draft.

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

The proposed approach has the potential to be highly effective in increasing the transparency and public understanding of how students can be admitted into higher education. We use the word ‘potential’ as it will require significant time and investment by the Department of Education and Training, TEQSA, Admissions Centres and higher education institutions to roll out the Implementation Plan. We acknowledge that TEQSA has sought additional national funding to support its role in this critical work across the sector.

We recommend the following three national support mechanisms to communicate and measure the effectiveness of the Implementation Plan:

- i. A broad **Communication Strategy**, including dissemination events across the HE sector. We recommend State-based workshops to progress the implementation of this national policy implementation.
- ii. A **Monitoring and Evaluation Framework** with key milestones and key stakeholders to track the effectiveness of the Implementation Plan for all stakeholders. We also recommend that the Department of Education and Training release a progress report against the framework measures once a year over the lifespan of the national Implement Plan.
- iii. A **national splashpage** on the Department of Education and Training website which communicates this information in a clear, coherent way.

As we have outlined above, the amendment and implementation of admissions policies, processes and practices across the higher education sector will require significant institutional and cultural change. *It is not just about changing institutions’ websites but also about changing admissions policy and practice. This, in turn, requires commitment to the policy change by the senior executive in each higher education institution.*

**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?**

We acknowledge the IWG’s ‘best endeavours’ approach in considering the workload implications by suggesting that these standardised information sets could be presented as PDFs which could be uploaded onto a website as part of the transition phase. It should be acknowledged that the production of PDF’s does not reduce the substantive workload of implementing the Plan at the institution level, but may reduce pressures on institutions to undertake substantial IT work. For example, PDF’s will need to provide information consistent with web pages and printed materials, which in many cases is already produced for 2018, in order to avoid confusion and meet the transparency objective.

We support the standardised presentation of admissions information sets, however, we are concerned by the ambitious timelines in the implementation of this information, particularly the August 2017 deadline. Many private providers are small, and potentially without significant resources at the institutional level to drive change in such a short period of time. **We recommend a longer period to implement these information sets, possibly 4-6 months because it requires institutional policy change and development.** One of the implications of changing admissions information is the significant workload around the review of the admissions policy and the importance of consultation workshops with key touch points across an institution [such as Academic Board/Senate, Senior Executive, and Heads of Departments/Faculties, Admissions Centre].

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

We would recommend that State-based workshops are provided for the sector on operationalising these information sets and adopting a common admissions terminology across higher education , including input from students. We also recommend a longer period to implement the information sets, possibly 4-6 months, due to the requirement for institutional policy change and development [see above]. We believe that we need to work towards May 2018 for approval for ATAR related definitions, thresholds and information sets. We require considerable time for sector dissemination to test the robustness of this national policy change and implementation.

**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

We support the proposed four broad groupings on the basis of admission for applicants to higher education. The classification process makes it understandable to students and their families on the pathways available for them to study in HE. We believe that there should be a range of assessment types for applicants when assessing their claim. COPHE institution members educate many students who seek to study on the basis of ‘work and life experience’, with acceptance including an interview and/or audition/portfolio requirement.

**5. Do you agree that the proposed approach to Australian Tertiary Admissions 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?**

COPHE agrees that the proposed approach to ATAR thresholds is reasonable.

Our main concerns with admissions terminology is the development of common understanding to ensure it is understandable to students, parents and other stakeholders. It is important that consistent terminology reduces confusion so that students from all backgrounds can access higher education. We support the adoption of common terms and definitions related to admissions, but encourage the IWG to seek students, parents and wider community feedback on their perceptions of the admissions language to be implemented. Another point of note, is that many of our member institutions already have published information on 2018 admissions for courses, with the present admissions terminology being used.

**6. Do the proposed information sets meet the need to 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 proposed information sets seem to meet the need identified by the HESP for comparability of information.

We have raised concerns, however, about the 'optional indicators' (financial support available including scholarships, student loans and fee discount schemes; and student and campus services) included in the proposed 'whole of institution' information set. **We note that this information does not align with the four broad groupings proposed by the HESP and, furthermore, would argue their inclusion as options detracts from the transparency and comparability of information that the information sets are meant to offer.**

COPHE believes there should be a **'provisional' agreement of these information sets until the higher education sector robustly tests these information sets.**

**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?**

We believe that the proposed approach to **some extent** adequately supports and informs prospective students about admissions options and pathways. ATAR is an important admissions indicator for many universities, but many COPHE member institutions do not solely rely on ATAR as the only, or even the main indicator for admissions. To address this concern we suggest a general statement of admissions policy might be added as part of the first section (or as a new section 2) to the 'whole of institution' information set.

To assist with the collation of these information sets and dissemination of the admission terminology, we also would suggest that TEQSA provide institutions with a draft of different types of evidence to assist in the collection of information. These types of evidence or exemplars will support higher education providers in interpreting the admissions information sets, which can in turn be refined based on feedback, to be part of a TEQSA Guidance Note on types of evidence to demonstrate compliance with the admissions transparency elements.

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

*New national admissions platform*

We endorse the development of a national admissions platform so that students/parents and schools have a transparent way of assessing options to study in HE. We would recommend that the Department of Education and Training, with the Digital Transformation Agency, work in a parallel process with the development of the information data sets, with an alpha and beta phase to test the rigor of these data sets with different stakeholders, including students, schools, and the community.

-----