



**Australasian Curriculum, Assessment  
and Certification Authorities**

ABN 77 634 037 164

C/- Northern Territory Department of Education  
GPO Box 4821, Darwin, NT 0801, Australia

Monday 11 September, 2023

Dear Australian Universities Accord

The Australasian Curriculum, Assessment and Certification Authorities (ACACA) includes the chief executives of the authorities in the Australian states and territories and in New Zealand responsible for curriculum, assessment, and certification in education.

ACACA members welcome the opportunity to provide feedback on the Australian Universities Accord (the Accord) Interim Report.

Addressing the increasingly complex and variable higher education admissions processes for direct school leavers is the highest priority for ACACA members. With the introduction of a range of individual university admission processes to either accompany or replace the ATAR, it is increasingly difficult for students, parents, schools and the broader community to have access to clear information about what pathways are available, much less to have equal access to them or recognise them as equitable and fair.

It is a positive step that the importance of equity has been reinforced in the Accord's Interim Report and it is also encouraging that the report calls out some of the contemporary issues arising from changes by individual universities to their admission practices.

It is crucial that the Accord address these issues of equity and transparency through clear and specific recommendations that respond to the Accord identified policy priority of *'making it easier for students to enter, exit and return to higher education through a consistent national approach to tertiary education admission'*.

The Higher Education Standards Panel (HESP) submission more fully discusses some of the risks associated with early (at-school) offers, however these risks are understated. These early offers are made prior to the completion of the senior secondary program of study and associated assessment program and the provision of final Year 12 results, including confirmation of the attainment of a recognised qualification, and more fulsome additional information which can be provided at that time. The use of unmoderated assessments of student performance in incomplete courses of study, to replace quality-assured end of Year 12 outcomes, carries considerable risk and may lead to serious unintended consequences including:

- raising the stakes of assessments or inferred evidence of student performance collected earlier in a student's senior secondary schooling without the associated learning having taken place;
- workforce capacity and workload implications for schools to provide detailed additional information;
- incentivising pathways or courses of study that may be seen to provide lower academic challenge;
- exacerbating inherent advantages of schools and individuals who have enhanced social capital; and
- the narrowing of options due to early selection.

ACACA members implore the Accord to recommend consistent national admissions practices through the lens of three underlying and closely related principles:

1. **Transparency:** *All potential applicants should have equal access to clear information about the requirements for applications and the basis upon which decisions will be made.*

Current practices, including selective positions made available to targeted candidates, opaque selection criteria, and individual school-university agreements are not transparent or accessible for all students. The proposed 'at school' framework should be located within a wider, universal framework, with associated standards, which allows all prospective students to understand and access all the options available.

2. **Equity:** *Admissions practices should ensure equitable access, with completion of senior secondary certificates of education (SSCEs) forming the baseline for selection processes. Admissions access schemes should be available for disadvantaged students, including for those who do not experience immediate success in their senior secondary schooling.*

The Commonwealth Minister for Education has articulated his desire that more disadvantaged students, especially First Nations and rural and regional students, are able to undertake and complete university study. This is reinforced in the interim report which highlighted the importance of building aspirations in underrepresented groups. The best way of promoting success for these candidates is to ensure that all students are supported to demonstrate their learning and that quality-assured assessment and reporting of student achievement is the core element of selection for further study.

However, there may be correlations with the socio-economic backgrounds of students and selections based solely on academic merit. Equally, the individual circumstances of students can impact academic performance. A key element of equity will continue to be found in admissions access schemes which all universities administer in some form to accompany the primary selection process. As with all aspects of selection, conditions, processes, and operations should be transparent.

3. **Foundations for success:** *University selection processes should align with the best possible preparation for success in higher education.*

The Australian education system is founded on 13 years of schooling, culminating in the award of SSCEs, recognised within the Australian Qualifications Framework as providing the foundation for pathways into higher education and higher-level VET qualifications. This system is explicitly supported by all Governments, and they share the aspiration of maximising the completion of senior secondary education. Completion of senior secondary provides the basis for the widest range of university course options for students to choose from and should form the baseline for admission processes.

ACACA members recognise that the ATAR can be interpreted inappropriately in the public domain as a proxy measure for school performance or narrow representation of individual student performance. Our members are all involved in work to broaden reporting to include other aspects of student achievement. We are open to investigating ways of using end of senior secondary education performance measures that may include more than a rank to inform university selection and would welcome working with HESP on this.

ACACA members welcome the timely discussion on developments in higher education admission practices. We urge the Universities Accord Panel to ensure that the full participation and achievement of students in senior secondary education remains central to admission practices as they evolve to meet the needs of all students.



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### ACACA CEOs Members



**Mr Tony Considine**

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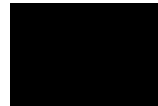
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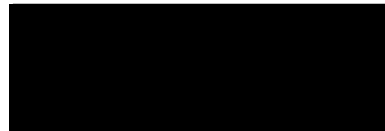
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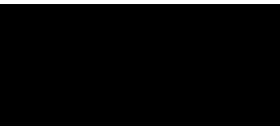
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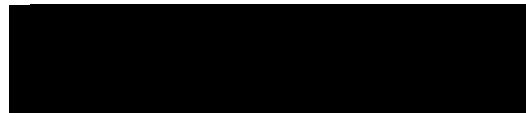
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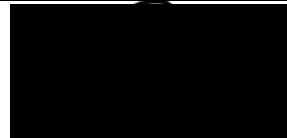
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**Ms Alison Savage**

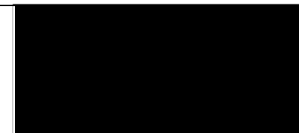
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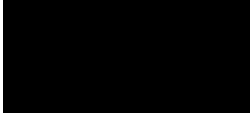
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**Mr Paul Martin**

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