Higher Education Standards Panel

Submission to the Australian Universities Accord Panel

Developments in higher education admissions practices

June 2023

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Overview

The Higher Education Standards Panel (HESP) makes this submission to the Australian Universities Accord review, linked to its workplan item to provide advice to the Minister for Education about:

> "changes in the landscape of admissions processes that have arisen since the Panel's 2016 report *Improving the Transparency of Higher Education Admissions*, particularly in light of the sector's response to the COVID-19 pandemic, and assess the impact of these changes".

The HESP's previous work on the transparency of admissions information inspired a sector wide effort to group information for applicants under four headings to reflect the major groups of applicants:

- those with past higher education study
- those with past vocational education and training (VET) study
- those with recent completed secondary education
- those applying based on work and life experience.

To prepare this submission, the HESP consulted with higher education and secondary school stakeholders via a discussion paper, supplemented by a series of focus group sessions with stakeholders. A summary of the consultation process is at Attachment A. In discussion with the higher education sector, school bodies, the curriculum, assessment and certification authorities, and student and parent bodies, it is clear that the concerns about the school to university transition that led to our earlier work remain strong. Students, parents, and schools continue to struggle to keep up with changes in admission pathways, designed by higher education providers endeavouring to link school leavers with their preferred next stage in their education path.

In this submission we explore the impact for all, but the major focus is the school to university transition, where there is the greater contention.

The Accord: Increasing demand from future students

The Accord process may identify future targets for higher education enrolments. Section 3.2.2 of The Accord Discussion Paper explores the challenge of stimulating demand from future students in line with expectations of skills needed for future employment.

The achievement of any future targets begins with the enrolment of students. The ability of the admission pathways to support the desired level of enrolments will be a critical factor. The interaction with the secondary education system is crucial and, as the consultations have shown, the relationships between higher education providers and secondary schools and their governing authorities are varied.

Any higher education enrolment targets the Accord Panel proposes will need to take account of secondary education outcomes and pathways to higher education.

In 2021, 79% of the potential year 12 population achieved a senior secondary certificate of education (SSCE)[1]. About 1% of students completed the International Baccalaureate (IB)[2]. Just over half the potential year 12 population received an Australian Tertiary Admission Rank (ATAR) by completing a package of study explicitly designed to lead to higher education entrance[3]. Just over one quarter of students undertaking a SSCE do not gain an ATAR. Many do so along with VET qualifications earned while at school. Around 20 % did not complete an SSCE or IB.

The proportion completing a SSCE is similar across jurisdictions, but with the Northern Territory and Tasmania lower at less than 60% and South Australia higher at 93%[4]. The proportions receiving an ATAR is more distinct across jurisdictions, ranging from just over 30% in WA and Tasmania, to around 60% in NSW, SA and Victoria[5]..

There is a strong assumption that a year 12 certificate with ATAR is the main pathway for a recent school leaver from secondary to higher education. Based on current numbers of students receiving an ATAR, this could pose a challenge to achieving the previous target from the 2008 Bradley Review of Higher Education for 40% of 25-to-34-year-olds acquiring a bachelor level qualification, let alone any future higher targets. To achieve increased levels of higher education attainment, providers have expanded the pathways for senior secondary students who do not complete a SSCE that leads to an ATAR. There are now many routes that lead from school to higher education, although some of these are contentious.

For the majority of higher education providers, including a large set of the universities, the emphasis is to widen attainment through linking suitable applicants to a course that matches their interests. Conversely, where the focus is on selecting the most capable applicants only, within a set number of places, the emphasis is to broaden out how capability of the level expected is assessed, to ensure applicants from all backgrounds are able to compete fairly.

The two approaches are not in conflict if across the whole set of providers it is possible to ensure that all Australians can gain the post school qualifications they need. They are in conflict if the requirements for one approach limit the other.

The divergent views on the value and impact of beginning the offer process while students are yet to receive their senior secondary results bring to the fore the differences in assumptions and intent for the selection of students. Data on the extent of at-school offers is elusive. The only available figure is that the Queensland Tertiary Admissions Centre (QTAC) indicates that 15% of offers to school leavers were at-school, being made by four of the Queensland universities[6]. About half of those were made just after external exams were completed.

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[1] https://www.acara.edu.au/reporting/national-report-on-schooling-in-australia/national-report-on-schooling-in-australia-data-portal/year-12-certification-rates Note that the Australian Curriculum, Assessment and Reporting Authority (ACARA) indicates the counts of certificates is not fully consistent across jurisdictions.
[2] Based on information from https://ibaustralasia.org.
[3] Calculated based on data provided by tertiary admissions centres.
[4] www.acara.edu.au/reporting/national-report-on-schooling-in-australia/national-report-on-schooling-in-australia-data-portal/year-12-certification-rates.
[5] Data provided by tertiary admissions centres and publicly available on their websites.
[6] QTAC response to discussion paper, p1.

These issues affect the operation of senior secondary education which is of great concern to the authorities responsible for schooling. Their focus is to ensure the secondary school certificates reflect the outcomes of the many years of schooling and set their students up well for their futures. The package of study that leads to an ATAR has been designed with university needs in mind. To an extent these needs have changed, which affects senior secondary education.

It is a major point of contention whether school student needs are best served by a hard barrier between completion of the SSCE and an offer of further education, or by a phased process across the final year of school of identifying options, indication of likely suitability and final confirmation once school results are known.

It is unlikely that there will be an easy consensus, beyond agreement on the need for students to complete their SSCE to their best abilities.

As admission arrangements develop, it is essential that they retain integrity for dealing with all applicants equally and fairly. Where assumptions about what fairness requires are embedded in a selective approach to admissions, they may need adapting to be relevant to courses which look to accept all suitable applicants.

Public concerns about changes in the school to higher education transition

A level of disquiet about the developments for the school to higher education transition is apparent[7]. The responses received to the discussion paper make clear the strong views created by the changes in admission options for school leavers.

School-based groups, whether the state/territory curriculum, assessment and certification bodies, parents, independent school systems[8], and school principals' associations, have expressed concern that students may respond to offers made before completion of senior secondary studies and assessment and the promise of 'alternative pathways' by easing back on their studies, with the consequence that they do not achieve as much from their secondary education as they otherwise would. This concern has been most prominent in NSW and WA, where the state Education Minister published an article[9].

The concern is shared by most state/territory curriculum, assessment and certification bodies. The South Australian Board for the Certificate of Education takes a different approach arguing the future requires a "reframing of the purpose of senior secondary education" while re-iterating that students must complete the SSCE.

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[7] "Why early university offers may be bad for students", Julie Hare, Australian Financial Review, 6 November 2022. https://www.afr.com/policy/health-and-education/are-early-offers-to-uni-undermining-the-academic-potential-of-students-20221104-p5bvp1

[8] "Time to end the arms race of early university offers", Dallas McInerny, CEO of Catholic Schools NSW, Sydney Morning Herald, 13 December 2022 https://www.smh.com.au/national/wait-what-i-m-not-getting-an-unconditional-early-offer-of-graduation-for-my-ba-20221212-p5c5q2.html

[9] "Are alternative uni pathways setting kids up to fail?", Tony Buti, WA Minister for Education, The West Australian, 13 January 2023 https://thewest.com.au/opinion/tony-buti-are-alternative-uni-pathways-setting-kids-up-to-fail-c-9426137

In response to this issue, the NSW universities have agreed five key principles concerning at-school offers, including a commitment to not make offers to school students before September 2023. [10]

Concerns have been raised in Victoria that students are opting out[11] of final Victorian Certificate of Education (VCE) exams and hence being allocated an ATAR. There are many reported drivers for this, with student personal circumstances and lack of belief in their need and capacity to sit external exams being prominent. This sits alongside arguments from a broad set of school principals[12] that ATAR as a single expression of school outcomes is undermining education outcomes for students.

Taken together, the examples highlight pressure on the ATAR as the predominant route from school to university for recent school leavers.

It is important to examine these significant concerns – to test their substance and to consider means to ensure any advantages demonstrated for changing undergraduate admission arrangements can be maintained while avoiding any negative outcomes or unintended consequences.

Summary of issues from consultations

Following the consultations on the discussion paper, three areas of contention stand out.

1. The potential conflict between, two contrasting approaches to selecting students for admission to higher education:

    − selection to a constrained set of places based on meritocratic principles. The focus is to rank applicants, by prior academic achievement, and make offers from the top of the rank order down, to fill a constrained number of places;

    in contrast to:

    − selection to find a suitable course for each applicant. The emphasis is to consider a wide range of information about the applicants to highlight strengths, with a desire to accept all suitable applicants. Where applicants fall short of needed prior achievement, means to close that gap are suggested.

2. The impact of the changes to higher education admission on enrolment and achievement in senior secondary schooling. There is significant concern from the curriculum, assessment and certification authorities, supported by parents and school groups, that its students are, or will, downplay the importance of the credential, reducing learning outcomes and undermining the credibility of senior secondary education and certificate.

    This is driven by the growth in selection processes that look to find an suitable course for each applicant, but make the offers to students before completion of senior secondary assessment.

3. Whether the suite of admission pathways retains the required high level of fairness, transparency and integrity of admissions processes. These could raise questions as to whether

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[10] https://www.nswvcc.edu.au/

[11] "System in decline: One in 10 VCE students choose to graduate without a score", Katie Roberts-Hull, The Age, 14 December 2022 https://www.theage.com.au/national/victoria/unscored-vces-show-not-enough-is-being-done-to-support-students-20221213-p5c61t.html

[12] "Principals urge education authorities to scrap ATAR", Adam Carey, The Age, 10 February 2023 https://www.theage.com.au/national/victoria/principals-urge-education-authorities-to-scrap-atar-20230208-p5cirv.html

the Higher Education Standards Framework (Threshold Standards) 2021, and guidance material related to the Threshold Standards, are sufficient to cover admission developments.

This submission sets out the basis for these issues of contention, supported by the evidence and information gathered through the consultation process to develop the paper. It proposes some actions where there is agreement about useful next steps and outlines where further discussion is required and testing against the directions the Accord process proposes.

Where next?

The emphasis of this submission is to set out the conflicting views and practices to allow them to be considered against the ambition for higher education, and post school education broadly, that is the Accord's remit.

In several areas there are steps the Accord Panel, the Department of Education, and the various stakeholders in secondary and higher education could take to resolve some points of conflict the submission highlights.

1. The Accord Panel could use the debate over admission pathways this submission outlines to assess how well current arrangements will enable its proposals for higher education attainment.
2. The higher education sector, with support from the Department of Education, could promote more clearly that the selection standard for courses can be achieved through many combinations of previous study, work and individual activity, of which the ATAR is one mechanism.
3. The Department of Education could work with higher education providers, the school systems, the curriculum assessment and certification authorities, and tertiary admission centres to create a robust framework for the making of offers to senior secondary students during and immediately after their senior secondary studies.
4. The Accord Panel could consider the transparency and availability of information to student advisors and parents, about the admissions pathways and opportunities.
5. The Department of Education and higher education providers could encourage the Australian members of the Australasian Conference of Tertiary Admission Centres form a stronger nationally linked set of Centres.
6. The Department of Education could work with higher education providers and the tertiary admission centres to ensure data reported on student admissions reflects current and developing practice, suitable to support analysis and understanding.

Structure of the submission

The HESP submission has thirteen sections as set out below.

Section One sets out the context of the HESP's investigations concern the transparency of admission arrangements and changes to those arrangements.

Section Two identifies the outcomes characteristic of an effective system for the transition into higher education. These outcomes should guide assessment of the changes in admission practices.

Section Three identifies the external factors driving changes in admission practices.

Section Four considers the intent of higher education providers in selecting students to their courses, highlighting the significance of the differences between selective and accepting courses.

Section Five considers the questions of fairness and integrity in admission pathways.

Section Six focuses on the admission arrangements for applicants who are not recent school leavers.

Section Seven begins the consideration of the admission arrangements targeting recent school leavers by exploring the major elements of the higher education admission decision process and its relationship to the presentation of secondary school outcomes.

Section Eight sets out an overview of current practice nationally and by state for admission pathways for school leavers.

Section Nine explores the challenge of at-school offers.

Section Ten sets out a potential framework for the operation of at-school offer schemes to reduce the concerns they raise and allow achievement of their aim.

Section Eleven considers the structural support for good information about admissions to be available to all relevant parties.

Section Twelve considers potential to strengthen the contribution of the network of tertiary admission centres.

Section Thirteen identifies international exemplars.

Section Fourteen highlights opportunities to improve use of admissions data to inform future developments.

Section One: Context

Previous work to improve the transparency of admissions information

Since 2016 the HESP has encouraged better information concerning higher education admission practices.

The HESP's 2016 report Improving the Transparency of Higher Education Admissions, took a close look at the range and quality of information available to prospective higher education students in Australia, whether school leavers, mature age or otherwise. The HESP found that, while all higher education providers had information about admission requirements available, the way this was presented created significant barriers for some prospective students to access the information they needed to make informed choices about future courses and providers.

In response, a joint Government and higher education sector working group developed a national implementation plan from 2018, with guidance for consistent presentation of admission information and publication of data about student cohorts for each course, using agreed common admissions terminology.

Across 2022 the HESP through its Advisory Committee on Admissions Transparency (HACAT) reviewed the outcome of the 2018 plan and considered its extension to postgraduate courses and to include information specifically relevant to admission of international students.

The HESP released a consultation paper with proposals for change in September 2022. Following responses, the HESP agreed not to proceed further at this stage, but to instead publish a report with recommendations of good practice drawn from the rich material provided in responses to the discussion paper.

Scope

The focus of the submission is the transition into undergraduate higher education programs by Australian and other domestic students.

Changes in admissions practices

The second phase of the current work moves beyond questions of information presentation to consider the implications of changes in admission practices now in train or in prospect in response to the ministerial request to the HESP in 2021 to

> "analyse changes in the landscape of admissions processes that have arisen since the Panel's 2016 report *Improving the Transparency of Higher Education Admissions*, particularly in light of the sector's response to the COVID-19 pandemic, and assess the impact of these changes".

At the beginning of this work several pieces of information suggested there were changes of potential significance in train.

The COVID pandemic led to considerable speculation about how well senior secondary students could demonstrate their suitability through the standard Year 12 certificate assessment process. Higher education providers responded with increased offers to students while still at school.

The creation of more at-school offer schemes is part of the broader development of the past decade for many higher education providers to have a suite of admission pathways available to applicants from all groups, which is a significant change for the approach to recent school leavers in particular. National numbers are not known, however QTAC indicates that 15% of the 2022 Year 12 applicant pool received offers prior to the end of the school year[13].

Universities have become more targeted in their use of tertiary admission centres as an admissions portal, with 42% of applicants applying directly to the university in 2021[14]. These remain primarily from non-Year 12 applicants but in 2020 there was a large jump to over 10% of school leavers applicants making direct to university applications, a level maintained in 2021. Current school students are much more likely to use direct applications in NSW (18%), WA (34%) and ACT (51%). It is likely that the increase in school leavers making direct applications to universities in NSW, ACT and WA is tied to at-school offers.

Beyond the school leavers, the arrangements for the 64% (2021) of applicants seeking higher education based on post-school study and work has much less visibility. Universities assess favourably previous successful higher education studies, with those applicants likely to be successful. Even for highly selective courses, good results in previous study provide a clear route in. The assessment of applicants with VET qualifications or general work and life achievement tends to be much more individual within established parameters.

There may be growth in systemic pathways for these applicants that reduces their reliance on individual action to demonstrate suitability. It is important to ask how these arrangements are changing and test their implications.

Language and the presentation of admissions information

At-school offer – an objective term for early offers

The HESP's 2018 Admissions Transparency work emphasised the importance of using terms that are descriptively accurate and not marketing oriented. This submission uses "at-school offer" rather than "early offer" on the basis it is more descriptive and less value laden.

The use of "early" is distinctive for the negative connotations given to it, with its sense of receiving an offer before it really should be made as an enticement and condemned as such for being too early, with the consequence of undermining a perceived due order.

The use of 'at-school' in this submission is intended to allow for a debate about the positive and negative impact of making offers to school students before the release of final senior secondary results.

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[13] QTAC response to discussion paper, p1.
[14] The data is drawn from Department of Education applications data as received from tertiary admission centres and individual universities.

It separates the school-based offer issue from the well-established offer rounds in the second half of the year for applicants from the three non school-leaver groups, for whom all relevant information is known and where an offer can be made without undermining the prospects for later applicants.

Alternative pathways

As put in the 2018 Admissions Transparency report:

> "Some of the terms previously in use reflect an assumption that a standard applicant is a school leaver assessed by academic ranking with an offer at some point early in January. Examples include any use of 'standard' 'alternate' 'alternative' 'special' 'main'. Institutions should replace those with more descriptive terms relevant to the issue."

'alternative entry' and 'alternative pathways' remain in common use. They continue to be subject to the same issue of casting those options as less suitable, potentially seen as being an easy way in. Edith Cowan University (ECU) comments:

> "Using the word 'alternative' to describe all non-ATAR pathways implies these options are inferior to ATAR. Instead, all pathways should be considered equally important as pathways in their own right".[15]

Given the suite of pathways now in use, to describe some as 'alternative' rather than all being considered viable options, appears obsolete.

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[15] ECU response to discussion paper, p2

Section Two: Objectives for a good secondary to higher education transition

Key points

- Higher education admission processes are a crucial factor in the achievement of national education objectives
- The transition to higher education should be as smooth as that between stages of schooling for all potential students

The transition to higher education

The essential outcome for the Australian education system is that each person, and collectively the vast majority of each age group, progressively acquires the education and training needed for successful employment and personal development. The emphasis is on progression to more challenging learning across each person's lifetime.

Since the 1990s the school systems have been structured to support this. Everyone expects to attend school, with initial entry, then transit from primary to secondary school being standard practice. High proportions gain a SSCE.

As the Accord's terms of reference state "more than nine in ten new jobs will require post-school qualifications, and fifty per cent of new jobs are expected to require a bachelor's degree or higher". This has created the expectation that the education and training system will support every Australian acquire a post-school qualification.

The result is to encourage expansion in the routes from school level learning and skill acquisition to vocational and higher education. It puts the focus on how to ensure that schooling sets up the full cohort of its students for tertiary training and study and the ways in which individuals then make the transition, whether in the following one to two years or several years later.

However, the transition from school to tertiary education and training is much less smooth than early transitions into school and then secondary and senior secondary. Individuals need to target their learning to a field of greatest potential. There are many choices of providers and courses. Students may have doubts about being 'good enough' for further study and the pull of employment and other personal experiences can be strong.

The 2020 Looking to the Future report is one recent major analysis of the challenge of transition to post-school education. A common theme is the desire to reduce the challenge of the secondary to tertiary transition, to make it more like the primary to secondary transition – a change of location and nature of study that the individual expects to make and which is easy to achieve.

One reason for the emphasis on admission transparency over the past half decade has been to reduce the challenge of accessing higher education by improving understanding of how the transition works and to support people in finding useful information and guidance.

The emphasis on the immediate school to study transition is important but should allow for appropriate focus on access to undergraduate programs for people coming back to study following several years or decades away from study.

Higher education admission arrangements are critical to the transition to post school education and qualifications. Assessment of their current usefulness and the value of changes underway should emphasise how well or not the admission arrangements are consistent with, and further support, the transition.

The discussion paper listed five potential objectives for the school to higher education transition. The intent of these objectives is to link the admission process back to the education outcomes desired for Australia's citizens. The objectives cited attempt to bring together the different pressures around the transition and the concern of the education bodies on either side.

1. Senior secondary students complete the SSCE of their state or territory, to the best possible outcome for each student.

   This is important for the school systems to complete their work and be confident of the senior secondary outcomes. It is important for tertiary providers that commencing students are well prepared since this allows them to focus students more quickly at the additional knowledge and skills they offer.

2. Reduction in the perceived high levels of pressure many senior secondary students feel to do well at the final point of schooling, which can undermine their learning.

   The majority of responses supported the need to moderate the level of pressure senior secondary students feel, while encouraging a focus on good learning outcomes. The state and territory Curriculum, Assessment and Certification Authorities cautioned that claims of the pressure felt were overstated, with the large majority of students coping well.

   Some in the university sector questioned the importance of the issue. They argued that it is important to learn how to respond well to the pressures associated with important life and work decisions and that doing so is an indicator of suitability for higher education entry.

3. For all people seeking higher education qualifications to have a clear, known path to the course each prefers.

4. Higher education students to have the foundation knowledge, skills and attributes relevant to the degree program they apply for.

5. For higher education applicants to be able to apply across the full range of courses, with a good match to predictions of future workforce needs.

In its response, the South Australian Certificate of Education Board proposed five similar objectives, with a strong focus at a transition that is designed to support each member of the school leaver cohort:

   – "A system that supports better matching of student capabilities and passions to courses, rather than one driven by a competitive statistical process
   – A smooth transition process between secondary and tertiary that is welcoming and accessible to all students
   – A transparent and explicit communication of the varied tertiary entrance methods, rather than a narrow focus and emphasis on the ATAR as the only method of entry
   – Greater diversity in tertiary admissions (especially from marginalised and disadvantaged cohorts) that drives more students to develop the ambition, capability, and selection into university

– More students in universities that would not traditionally be selected through the current processes (disproportionate focus on 'academic' achievement); these are students that have the knowledge, skills, and capabilities, but are invisible to universities"[16].

Where next?

1. The Accord Panel could use the debate over admission pathways this submission outlines to assess how well current arrangements will enable its proposals for higher education attainment.

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[16] SACE Board response to discussion paper, p1

Section Three: External factors driving changes in admission practices

Key points

This section considers the external factors driving changes in admission practices:

- the expectation that all Australians will acquire a post school qualification;
- the impact of demand driven funding;
- higher education competition for students;
- theCOVID-19 pandemic's impact on education at all levels;
- more focus on the individual in education; and
- changes in senior secondary education, with more students choosing study combinations that do not lead to an ATAR.

Expectation that all Australians will acquire a post-school qualification

The expectation that the education and training system will support every Australian who wishes to acquire a post-school qualification has led to admission decisions that increasingly focus on matching applicants to a course that meets their interests and needs. Courses designed to admit most suitable applicants have provided much of the growth in higher education places.

The selective courses remain strong and numerous. The providers offering these strongly emphasise the need to attract the most capable students from all backgrounds. It is an approach of meritocracy[17].

The expectation of post-school study for all has its critics. The argument that most people need post-school learning and skills is subject to concerns that:

- only a proportion of the population has the capacity to achieve higher levels of learning and skill; and
- the need to provide to a greater range of students leads to changes in the education delivered that alters the standard of learning students achieve.

It raises questions that the primary and secondary education sectors have confronted, as education at those levels has moved from being for a few to being nearly universal.

In responses to the discussion paper, several universities endorsed that the greater breadth of applicants are able to complete a degree successfully. Macquarie Universities states:

> "Macquarie University does not support the concept of only a small proportion of the population having the capacity to achieve higher levels of learning and skill. Experiences prior to higher education may have limited an individual's achievement to date, but this does not translate to a limitation of potential. A recent study has shown that while students may present with different levels of performance, rates of learning between students of differing levels of achievement are

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[17] Peter Mandler, *Crisis of Meritocracy Britain's Transition to Mass Education since the Second World War* (OUP, 2020)

very similar and if a learner has access to favourable learning conditions and opportunities to practice they will be able to master advanced concepts [Koedinger et al, 2023].

Admission practices should reflect both past performance within the context that this was undertaken, as well as potential for future success. This also demonstrates the need to consider admission practices holistically as part of the whole educational lifespan, reflecting the support offered to students adequately during the pre-access stages, such as during secondary school, and in the support and opportunities offered to students while undertaking their higher education studies."[18]

UNSW argues that "there is no evidence to support…concerns raised that widening access to education will alter standards of higher education overall".[19]

Impact of demand driven funding

To support a major expansion in higher education attainment, through the 2010s universities were funded for all undergraduate students they enrolled, reducing the need to rank and exclude applicants and increasing the range of courses seeking to attract students whose readiness for the course could be established.

This saw an expansion in health sector courses, responding to the growth in health service professions, and removed the previous financial barriers to expanding STEM delivery, allowing those courses to meet demand. All other areas also grew.

Demand driven funding created a sector oriented to expansion, but which is still working through its implications for past assumptions about university admissions.

Higher education competition for students

University funding through the Commonwealth Grant Scheme is driven by the number of students and the discipline of the units they study. Since 2018 there have been caps to the amount of funding that can be received. COVID-19 induced reductions in international student enrolments heightened the need to maintain domestic enrolments at the capped level. Current demand for higher education is largely being met.

Many responses to the discussion paper highlighted the impact of the Job Ready Graduates package for squeezing funding to many disciplines and attempting to steer students' choice of degree. The university responses generally pushed back against such steering, in favour of being able to respond to each applicant equally.

The competitive elements of the higher education system drew comments from many participants in the consultations on the discussion paper. Most were negative, arguing that the desire for students for financial reasons drives predatory recruiting, with rationales about improving individual outcomes and better alignment of needs and preferences to courses created to obscure the financial intent. Some seem to assume that higher education funding remains open ended.

Aspects of the conflicting views about at-school offers are driven by concerns about impact on student choices and the relative advantages and disadvantages for institutions. The interplay across

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[18] Macquarie University response to discussion paper, pp2-3
[19] UNSW response to discussion paper, p4

the university sector about the advantages and disadvantages of older and newer admission schemes shows the competitive element involved.

UNSW cautions against a spiralling competition for at-school offers that forces every university to engage:

> "This increased at-school offer activity has led to a self-fulfilling proliferation of at-school offer schemes from institutions across the board in an attempt to provide increased certainty for applicants while bolstering application and offer volumes to drive increased conversion. Within a capped market, this has led to increased competition between institutions as individual students amass a number of at-school offers to give themselves 'options' even though they ultimately only enrol in one institution."[20]

The Australian Council of State School Organisations worries the competition fuels unnecessary growth:

> "Tertiary Admissions Centres exist to help with the admissions process, and they confront the challenge of simplifying the experience and supporting students while still being attentive to the agendas and priorities of the universities they serve. Because of the ease with which one can apply to university, these platforms have become vehicles of both access and excess. This has contributed to a vicious cycle of uncertainty and "application addiction," in which universities seek more applicants in their admission pool and students apply to more universities. Because this cycle makes enrolment more difficult to anticipate, all stakeholders in this maelstrom respond with a misguided "more is better" mindset." [21]

COVID-19's impact on education

The potential for COVID-19 driven disruption of senior secondary certificate assessment mechanisms created uncertainty for some students Each state/territory was alert to the challenge and made adjustments where considered necessary. For example, in SA adjustments have continued into 2023[22].

With doubts about whether standard assessment could take place, and whether it would reflect students' capability as reliably, providers made much greater use of schemes that link students to their higher education study prior to completing all year 11 and 12 requirements. Some respondents argue this was highly opportunistic.

The potential for senior secondary learning outcomes to be less certain than in previous years could hamper the smooth transition to tertiary level learning. This is a factor for how higher education providers support students once enrolled. It highlights that admission pathways are predicated on school learning levels being consistent year to year.

The curriculum assessment and certification authorities point out that the actual level of disruption was much lower than some predicted, with the school systems responding effectively to the COVID-19 challenges. On this basis, some of the higher education proactive responses may not have been necessary. Whether they have shown value for the medium term or should be wound back is part of the debate.

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[20] UNSW response to discussion paper, p4
[21] Australian Council of State School Organisations response to discussion paper, p4
[22] https://www.sace.sa.edu.au/2023-subject-adjustments

More focus on the individual in education

There is a higher level of importance given to supporting each person achieve their own personal outcomes, creating concerns that generic arrangements may work for the majority of the cohort but can be negative for many. This creates arguments for greater individualisation of education, looking to create a particular pathway for each person tied to a means to realise it. A greater individualisation of the transition from one education setting to the next can both:

- support each person achieve a better outcome, more clearly suited to interests and capacity; and
- comparatively disadvantage those least prepared for individualised arrangements The concern is that many will not know how they work, allowing those who do to gain an advantage.

The evidence that students' choice has barely changed, despite the efforts of governments several times, most recently through the Job Ready Graduates package, emphasises the value that can come from supporting individuals pursue their self-assessed interests.

The University of the Sunshine Coast argues:

> "Despite concerns raised about transparency, fairness, equity and the risk of potential corruption (Bastedo,2021), the holistic assessment process, when managed well, addresses the concern that traditional admission practices place undue weight on standardised test scores, which may disadvantage people from under-represented groups including First Nations people, those from low socio-economic backgrounds and people with disabilities. It is also argued that quantitative measures do not tell the full story and are therefore not necessarily the best predictors of success"[23]

Changes in senior secondary education

The higher education sector works with the secondary education sector as it develops and changes. The secondary sector, in turn, is very cognisant of entry to highly selective higher education courses as a marker of esteem and achievement for student, parents and schools.

Across Australia the senior secondary certificates provide a wide range of study options, with one pathway structured to make the student eligible for an ATAR. These arrangements influence student subject choices.

As set out in Section Seven, there is wide variation across jurisdictions in the proportion of senior secondary students who complete an ATAR eligible package. This limits the capacity of higher education to expand without admitting numerous students who do not complete an ATAR eligible SSCE. To the extent that the ATAR eligible certificates were seen as the route into higher education, it is no longer so. The ATAR route is but one of many.

In parallel, there has been some growth in the number of students taking International Baccalaureate (IB) rather than the SSCE. They represent about one per cent of all senior secondary students across Australia.

More substantially there is a movement, referenced by many respondents to the discussion paper, to reshape the school curriculum, assessment and reporting to "a holistic, 360-degree

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[23] USC response to discussion paper, p7

representation of student achievement [that] incorporates their deep discipline learning as well as the identification, recognition and valuing of students' capability development." [24]

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[24] SACE response to discussion paper, p2

Section Four: The changing intent of higher education admissions

Key points

- Higher education courses are a mix of 'selective' courses where suitable applicants compete for a limited number of places, and 'accepting' courses, where applicants need to be capable of completing the courses successfully.
- The two approaches lead to different kinds of admission pathways.
- Accepting courses have widened out the range of pathways from school to higher education.
- Ensuring equity in access and attainment takes two forms:

    - direct programs to offset disadvantage, additional to standard arrangements;
    - widening the set of standard arrangements to allow all applicants to demonstrate their potential.

Selective versus accepting courses

For every higher education course, the provider is likely to have applicants from all four groups highlighted in the 2018 admission transparency report (as outlined on p.4)[25]. For each of those groups, there may be several pathways available, with some pathways operating across several of the groups.

This submission groups higher education courses into two sets, based on whether they tend to be:

'selective courses': where there are usually more applicants than places to be offered. Tools such as academic ranking are used to decide who receives an offer and who does not. The challenge for the applicant is to show they are better than other applicants.

'accepting courses': where the higher education provider tends to make an offer to all applicants who meet a threshold of academic potential. The challenge for the applicant is to show they are capable of completing the course successfully.[26]

The distinction between selective and accepting courses is a useful descriptive classification. Several responses endorsed use of the typology. Most providers have a mix of both, while numerous courses will display elements of both. Selective courses will use a range of other criteria to buttress enrolments if needed. Courses may have a clear threshold, with multiple means to show it is met, while rejecting immediate entry to applicants who fall below it.

Much higher education discussion focuses on the best practice in selective courses. There is less emphasis on understanding the needs and challenges of accepting courses. Both drive changes in admission practices.

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[25] The University of Sydney in its response to the discussion paper indicated that it does not admit applicants from the VET or work and life experience streams into its undergraduate courses.

[26] This typology is used by several tertiary education researchers. Its original presentation is in Maclennan, Alex, Musselbrook, Kerry and Dundas, Margaret (2000: 12) *Credit transfer at the FE/HE interface: widening opportunities*. Research report for the Scottish Higher Education Funding Council available at https://www.voced.edu.au/content/ngv%3A84214.

Selective courses

Where the number of potential students is much greater than the number of places the provider can or will offer, the emphasis is on identifying who is most suitable to the provider. Ranking systems come to the fore, usually based on an estimate of the candidates' previous levels of achievement. Previous achievement as the basis for selecting among many applicants:

- is an indicator of likely future achievement, with reasonable correlation from previous cohorts to support this;
- recognises previous study to encourage people to do well; and
- is seen as natural, from an assumption that the academically better should get a place ahead of others.

The selective courses require precise means to align school leaver ATAR with IB results, with summations of previous higher education such as Grade Point Averages, and with Special Tertiary Admissions Test (STAT) results. The generic term "selection rank" refers to the rank created.

The selection process for these courses can be enhanced with other criteria and requirements, such as portfolios, personal activities in community or work, or recommendations from schools. In these cases, the additional criteria can be used either to narrow further the group in contention or allow each applicant to bring a wider set of relevant information to bear in the competitive process.

As UNSW states:

> There is also a greater understanding across institutions that an ATAR is not the sole indicator of future academic success, and this has led to an increased number of programs with additional selection criteria (e.g. interviews, auditions, additional assessments/exams) and an expansion of alternative admissions schemes to admit quality students who may be able to demonstrate their aptitude to succeed in a manner which complements their ATAR."

But equally if these are a further requirement:

> The benefits of additional selection criteria or testing requirements need to be carefully considered to ensure they provide a real and tangible benefit to equitably assess and distinguish applicants, while not adversely impacting students or further exacerbating existing systemic disadvantages for underrepresented cohorts. [27]

Accepting courses

In contrast, many courses are accepting courses, with capacity to accept most suitable applicants, which shifts the focus from ranking applicants down to the number of places available, to confidence that the person should be able to complete the degree.

The question for these courses is how the threshold of suitability is determined and expressed to potential students. Providers have adapted the selection rank system to emphasise that all applicants above a given point will receive an offer, while considering those below that point in more detail.

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[27] UNSW response to discussion paper, p4 and p6

Universities, such as all those in Western Australia, have set out an array of means for applicants to show their suitability. They make greater use of 'selection rank' which makes explicit that several educational and personal backgrounds contribute to the rank, of which the ATAR is but one method.

Selection for these courses can include other criteria and requirements, such as personal activities in community or work, or recommendations from schools. In these cases the additional criteria are used to widen the basis for accepting an applicant by adding to the set of potentially positive information about the applicant.

For example the University of Wollongong states:

> "The University of Wollongong supports the distinction between selective and accepting courses as outlined in the discussion paper. The focus for UOW in accepting courses is to establish the applicant's readiness for the course. UOW admits students to courses based on merit, and where students are assessed as having a good prospect of succeeding in their chosen course."[28]

Implications

The changing focus of education policy that targets most Australians gaining post-school qualifications calls for a renewed understanding of how higher education providers can use a mix of selective and accepting courses. The outcome needed is to link every interested person to a suitable course that balances the applicant's capabilities, preferences for area of study and future career, against the initial knowledge and skills required to be successful in the course.

UWA's experience-based entry scheme has an automatic checker that indicates the likelihood of acceptance based on a wide range of criteria, designed to establish the best case for the applicant https://www.web.uwa.edu.au/eligibility-checker/ . Such approaches help reduce the cost of assessing the array of relevant material.

How many places are available for a course, and hence the level of difficulty of entry, is a decision of each provider, balancing: facilities and staff to provide the course; revenue questions such as limits to Commonwealth supported places or total funding; the academic minimum a provider wants to set for the course; external pressure and requirements from professional bodies and employers; and reputational factors associated with highly competitive courses or with courses seen to be easy to enter.

None of these factors is necessarily set firm. An individual's capacity for study can change over time. With experience of the workforce, individuals' needs, and preferences develop. People who did not want higher education when completing school can return to it several years, if not decades, later.

The substance of a course develops with time. The expectations for courses are not set independently from an understanding of the likely students and the broader economic and societal return for its graduates. They reflect a complex interaction of how the course has been taught, changes in the academic field, the influence of any professional bodies linked to the course, and the initial knowledge and skills of the applicants.

Macquarie University in its response to the discussion paper argues:

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[28] University of Wollongong response to the discussion paper, p1

"entry schemes and pathways that universities use as their primary admission processes should be developed in a manner that recognises the diverse way capability may be demonstrated. In some instances, a numeric based indicator that accounts for inequities will be appropriate. In other instances, criteria may be broadened to account for differences in opportunities and experiences. The Accord offers an opportunity to demonstrate the value in allowing ongoing innovation in admission practices that enhance the opportunities for students who come from underrepresented groups. It will be important to ensure that innovation in admission practices is enabled and not restricted under the Accord".

For schools, as understanding of accepting selection grows, students' choice of subjects may in turn change in response to the different needs to achieve prerequisites, pursue individual interests and optimise assessment outcomes.

Accessing admission schemes for students from underrepresented groups

A major ambition for changes to admission arrangements is to improve the participation of students from underrepresented groups. The need to improve the balance of students is a common theme across response to the discussion paper.

The Australian Council of State School Organisations recognises that universities are dealing with unequal outcomes created much earlier in applicants' education:

"We recognise that it is not the responsibility of higher education admissions to make up for educational or social disadvantages. However, identifying latent talent and potential that may not be fully demonstrated by examination results is a legitimate goal for admission centres and universities seeking to recruit the best students possible regardless of background."[29]

The types of approaches to improve the outcomes include:

- inclusion of additional points to the selection rank for various factors. These include demonstrated cases of personal or financial hardship and location of residence, used to stimulate enrolments from catchment areas with low participation. The adjustment approach combines the broad-brush addition of several whole points to the much finely graded ATAR to produce the selection rank;
- distinct schemes seeking out applicants, usually school leavers, from underrepresented groups to assess capability based on an individual assessment; and
- operating a broad range of admission pathways, open to any, but which collectively create opportunities for a broad range of applicants. These de-emphasise school results as the only measure, opening up access to more school students but with potential for negative impact on school results.

Of these, the first two put the emphasis on special arrangements for applicants who are from underrepresented groups, attempting to bring them in line with standard operations. The third emphasises having the suite of admission pathways that provides at least one reasonable option for every potential applicant, so that the focus is the comprehensiveness of the pathways not the disadvantages that the individual may have.

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[29] ACSSO response to discussion paper, p2

A major challenge for the introduction of new admission schemes, is that people from underrepresented groups are often the last to know about and trust the new opportunities. Even when changes are designed for people from such backgrounds this can be the case.

The advantage of highly numeric indicator driven assessment systems is that each person is treated equally based on those inputs. This is clearly the case for the ATAR. It is less appreciated that many of the non-ATAR pathways are based in a numeric analysis to produce a selection rank. As responses during consultation emphasised, the capacity to scale up a pathway depends on the assessment being systemic.

As The University of Sydney states:

> "we are particularly concerned that applicants from equity groups will be further disadvantaged by not having access to the information or required school support to ensure that they have the best chance of gaining university admission to their preferred course"

The SA Board for its Certificate of Education responded that:

> Essentially, any model that that is based on the principle of 'ranking on the basis of academic achievement' will continue to disadvantage underrepresented groups. Rather, a model that acknowledges that diversity in learners and develops a process to match suitable candidates to their capabilities and passions will provide greater access and inclusion.[30]

An example of the challenges is the take up of special consideration provisions that can give a school leaver applicant an adjustment to their selection rank. From being an option taken up by a few applicants, it is now close to automatic for many to apply with the result that large numbers receive the adjustment. The Victorian Tertiary Admissions Centre (VTAC) provided data that 82% of Year 12 students applied for the Special Entry Access Scheme (SEAS)[31]. In consultations, the claim was made that many applicants for special consideration provisions come from high-SES schools.

Regional students can live at the border of two states, offering greater potential to consider university study in either state. They then face the challenge of the different arrangements from one state to the next. As La Trobe University states in its response to the discussion paper:

> "harmonisation on regulatory frameworks across state jurisdictions. This would be of benefit to both providers and potential students in border communities who are currently subject to differing regulations and requirements."[32]

The Isolated Children's Parents' Association of Australia support need for cross border rationalisation:

> "A national approach to managing applications across borders would simplify student's applications to their chosen tertiary institution, especially if applying interstate. Many rural and remote students, by nature of where they live, do not necessarily study at an institution in their home State. Further, for States and Territories such as Tasmania and Northern Territory, that do not offer certain courses, for example Veterinary Science, students would benefit from a national approach."[33]

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[30] SACE Board response to discussion paper, p2
[31] VTAC response to discussion paper, p7
[32] La Trobe University response to discussion paper, p2
[33] Isolated Children's Parents' Association of Australia response to discussion paper, pp2-3

The changing frontiers of admission

There are potentially more radical changes to the admissions process, which are not explored in this paper. In its submission, QUT points to further changes in how admissions could operate in the medium term.

> "Students are valuing student-centric admissions practices (such as timely offers, multiple offers, alternate admissions pathways, and simplified application processes) and will engage with higher education providers that meet this need."

> "competitive admissions practices will increasingly include packaged offers. These can take many forms, including:
>
> − One offer that packages undergraduate and postgraduate studies (e.g. Bachelor and Masters programs).
> − Slipback offers (i.e. a pathway to a preferred program) - Diploma and Bachelor packaged offer.
> − Multiple offers, i.e. for all eligible course preferences.
> − Micro-credentials that can be packaged to meet specific needs.
> − Packaged offers are likely to become wider in their offerings to make the transition to higher education more streamlined for students. Offer packages are starting to include approved credit, accommodation, work experience, study exchange opportunities, scholarships, and other aligned student and lifestyle services."[34]

Such developments would further individualise and complicate the admissions terrain.

Where next?

2. The higher education sector, with support from the Department of Education, could promote more clearly that the selection standard set for courses can be achieved through many combinations of previous study, work and individual activity, of which the ATAR is one mechanism.

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[34] QUT response to the discussion paper, p2

Section Five: The challenge of fairness and integrity

Key points

- Fairness to each applicant and between applicants is essential to effective admission systems.
- The growth in accepting courses challenges how to assess fairness in practice and to ensure integrity of decisions made.

The challenge

Both those advancing changed pathways, and those concerned about their impact, recognise the importance of preserving fairness in the admissions decisions, with transparency and consistency in practice, and ensuring effective monitoring of the impact of changed admission pathways.

Fairness is open to many interpretations. Assessment of the value and impact of changes in admission practices needs to take account of the regulatory requirements for higher education providers concerning admissions. The box on page 30 sets out the relevant parts of the Higher Education Standards Framework (Threshold Standards) 2021, which applies to all providers, and the *Higher Education Support Act 2003* (HESA) which applies to all providers approved under that Act.

The Standards require fairness in applying the policies, requirements and procedures, not whether these are in themselves fair. This reflects that any process to select some but not others, where each is capable of the course, can be argued for its fairness. It is up to the provider to articulate the basis on which decisions will be made and then apply it in practice.

Responses to the discussion paper made no explicit proposal to alter the regulatory requirements on the Higher Education Standards Framework or HESA. This suggests that that regulatory requirements are considered appropriate. The debate is about the how to ensure admission developments are consistent with the desirable outcomes the Standards and HESA seek.

Fairness

Several responses were concerned that a greater range of pathways and, in particular, the use of at-school offers held considerable risks of being unfair, without suitable safeguards in how they operate. They cite the impact of greater complexity on those least familiar with higher education and the impact on those who are not made at-school offers, respectively.

The analysis undertaken for HESP of applications data split between applicants who apply direct to universities and those who apply to tertiary admission centres found considerable growth in school student direct applications in NSW, WA and ACT. This appears to be associated with at-school offers in those three jurisdictions. On analysis, the students using direct applications were weighted to either end of the SES spectrum, with a particular over representation of high SES ATAR 90+ students.

The data points to the risks of new options favouring those better placed to know about them. It aligns with growth in at-school offers targeting students with good year 11 results, who then go on to achieve high ATARs.

The Queensland Curriculum and Assessment Authority (QCAA) points to:

> "the growth and opaqueness in selection practices using information beyond final senior secondary schooling achievement including incomplete school achievement information (i.e. Year 11 results), school recommendations and other emerging tools (e.g. learner profiles).[35]

Issues include:

- admission arrangements that move away from the certainty of the comparative ranking of applicants by ATAR or similar tools;
- schemes that require the applicant to lodge a specific request to be considered additional to the main application process. This is a risk since:
  - not all may be aware of the opportunity,
  - the work to lodge the additional application could hamper eligible applicants;
- schemes that use school (or other recommendations) could hinder applicants whose school is not able or willing to support them;
- perceptions of favouritism, bias, or possibly even corruption when admission is based on recommendations and other highly individual inputs that require considerable individual judgement by the decision maker;
- schemes that assess individual activity outside of education are at risk of excluding applicants with less time or resource to pursue such activities;
- the effect of at-school offer schemes on both those who receive them and those who do not;
- at-school offers being based on Year 11 assessments not designed to be used in this way; and
- whether at-school offers reduce the potential success of other applicants before all relevant information is available. In effect if they become a 'first in, first offered' type scheme.

The distinction between selective and accepting courses is important for assessing fairness.

- If the result of a decision is to select one person ahead of another the rationale for that needs to be clear. Each positive selection is negative for another applicant.
- By contrast, if the result is to select a person, or not, with no implications for other applicants the question is limited to the fairness to that applicant. The test is then the evidence used to determine the applicant was, or was not, likely to succeed in the course.

The issues raised contain several common themes that can be worked through for ways to avoid or minimise risks.

- It is essential that providers endeavour to make all admission pathways known equally to potential applicants.
- Mechanisms that automate consideration of applicants reduce the impact of individual judgements and of applicants not asking for available options. One example is where all school student applicants to a tertiary admission centre are assessed for eligibility for an at-school offer (see Section Eight).
- Long standing practice has seen providers allocate places across a period of several months in advance of enrolment, to non-school leaver applicants via different pathways. These offers are made while ensuring there will be places for equally capable applicants later in the process.

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[35] QCAA response to draft submission considered by HACAT working group

Other aspects are beyond the direct influence of the provider. Concern was expressed that school students may pay for a VET Certificate IV or Diploma instead of completing a SSCE, with the intent to use VET pathways to gain 'easier' entry into higher education. Such examples seem part of the reality that school students' parents pay highly diverse amounts to gain their children's senior secondary and related education.

In Section Eight there is further consideration of the fairness challenges for at-school offer schemes.

Integrity

Along with fairness the risk from more individualised assessments of suitability is that decisions will be made that intentionally subvert the intent.

Claims of misuse of admissions decision-making to advantage individuals are rare in Australian higher education. The possibility remains ever present and is heightened for selective courses where the reality of failure to receive an offer is strongest.

As raised in a response to the discussion paper, internal governance is important for all admission decisions. In their responses, providers indicate no difference in their arrangements that would make some schemes more subject to risk than others. Rather the message was that the criteria and combination of outcomes for each criterion are set in advance with the admissions systems set up to implement this.

Box 1

Regulatory frameworks governing admission practices

Higher education standards framework – admission requirements

Standard 1.1 Admission is the lead section of the Standards concerning admission. It says:

> Admissions policies, requirements and procedures are documented, are applied fairly and consistently, and are designed to ensure that admitted students have the academic preparation and proficiency in English needed to participate in their intended study, and no known limitations that would be expected to impede their progression and completion.

This has three elements:

- documented practice. The admissions transparency process is one part to ensure that this is so. Its major relevance to developments in practice are to require testing of approaches and confirmed changes to be set out clearly;
- fair and consistent application.
    - Consistent should be straightforward to apply and demonstrate
    - Fair raises many questions but seems to mean that they are applied fairly, not that the policies themselves need be fair
- a defensible basis to judge whether each student should be capable of completing the course, covering distinctly previous academic achievement and English language competence.

TEQSA's Guidance note Admissions (coursework) lists other standards with a close relationship to admissions. These standards cover:

- the granting of credit and recognition of prior learning agreed as part of the admission process;
- support for student diversity in the admission process;
- monitoring of students once enrolled to test suitability of admission decisions;
- information on admission arrangements is readily available; and
- provider internal arrangements ensure effective review of admission practices including within agreements with third parties to deliver education.

Higher Education Support Act 2003

Section 19-35 of the Higher Education Support Act 2003 requires that any provider whose students receive support must have "open, fair and transparent procedures that, in the provider's reasonable view, are based on merit".

Once enrolled Section 19-42 requires "Before enrolling a student in a unit of study, a higher education provider must assess the student as academically suited to undertake the unit concerned".

The use of 'merit', notwithstanding the caveats placed around the requirement in the Act essential argues that, where a choice must be made, the applicant with the higher learning skill should be successful and the applicant with the lower miss out. It is the common, rarely questioned, higher education practice – its economic and social rationale is rarely explicated.

Section Six: Admission practices for non-school leaver pathways

Key points

- The non-school-leaver pathways have long used previous education outcomes, aptitude tests, and individual interest to assess suitability for higher education.
- The systems to bring those various factors into a single rating are now helping with the growth in non-ATAR pathways for recent school leavers.

The consultation process provided only limited further information about the admission pathways and arrangements for non-school-leaver applicants.

Transition from part or complete higher education to a following course

All providers recognise that successful previous higher education is a strong indicator for future success. Where selection is competitive, higher education providers may use Grade Point Average to rank applicants or to establish whether the applicant meets threshold tests of suitability.

The assessment can refer back to previous education outcomes such as senior secondary results, but this is usually considered secondary to actual results in higher education. Whether the previous study has been in the same field or a different area can be relevant to decisions about the application.

There are schemes across providers to facilitate transfer, which emphasise recognition of previous study to reduce the study required to complete the new degree program. See for example The University of Sydney with reference to agreement across the Group of 8 members to consider assessment results.

There is significant movement across courses and across providers. The extent can be seen in the difference between the 'normal' and 'adjusted' attrition and retention rates for each university (see https://www.education.gov.au/higher-education-statistics/resources/2021-section-15-attrition-success-and-retention). The 'adjusted' figures include students who have moved to another institution as retained in the system while the 'normal' considers a student who has moved as a loss to the first provider. Nationally about 6% of Australian students have changed institution from one year to the next.

This aspect of admissions rarely gathers much attention. In the consultations, the NUS commented that students could find the transfer process cumbersome but did not think there were major barriers. There can be disputes about the amount of credit for previous study, where judgements are made about the direct relevance of previous units and the level of the results.

The University of Melbourne argues the need for more attention:

> "Improvements to non-school leaver admission processes should be a priority. A national system of recognition for non-school leavers and VET transfers would acknowledge the growing

importance of this cohort, and would benefit students and universities. Further work to facilitate tertiary transfers (for example, after first year) would greatly benefit students who find themselves in a degree which has turned out to be unsuitable. While the University of Melbourne admits a relatively small number of non-school-leaver entrants (less than 5 per cent of commencing undergraduates), we encourage HESP to focus on this cohort."[36]

Transition from VET

In most cases, the VET to higher education pathway remains dependent on individuals applying to be considered.

There is growth in VET-higher education course combinations, where students of the VET program have a known pathway to an associated degree program. These are usually specific to the institutions involved, or an internal pathway for dual sector providers.

Those TAFEs that are also approved higher education providers talked in the consultations about their processes to support students make the transition, whether from their own VET courses or from elsewhere. Many of the issues they raised concern VET issues such as the capacity to provided graded marks for study, in addition to a recognition of competence.

The major, longstanding bugbear is the challenge to determine quickly and reliably the extent of credit to the degree program for the VET learning which involves the interaction of:

- VET study that directly overlaps part of the higher education course. This requires specific matching. It is hence most functional when the VET and higher education provider have pre-existing arrangements whereby the overlap has been determined;
- general credit in recognition that the applicant has gained an element of learning skill from the VET qualification. This is similar to higher education dual degrees where both tend to be slightly shorter in recognition of the study in the other. This has been advisory for several decades but still runs into concerns in identifying which parts of the degree should be required and which can be excluded as credit; and
- students varying interest in full credit, balancing out avoiding the repetition of previously learnt information and skills against the gain from revisiting the material from a higher educational perspective and the risks of missing valuable knowledge from a unit for which credit is given.

Overall, there is a tension between the efficiency of the systemic approach and the thoroughness of an individual appraisal of past learning against the degree program.

The Universities Admissions Centre (UAC) argues that it, and other tertiary admission centres, could improve the credit recognition process, reducing frustration for applicants with previous higher education and previous VET:

"For students with previous higher education experience and/or VET qualifications, the admission experience could be significantly improved by efficient and transparent credit arrangements. UAC has expanded its services into this area, with much interest from providers in participating in a credit platform. However, this initiative is at a relatively early stage with respect to its adoption, and as such is an area of considerable inconsistency across the broader

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[36] The University of Melbourne response to the discussion paper, p3-4

Australian higher education sector. Unsurprisingly, this inconsistency translates to a degree of frustration for students."[37]

Return to study based on life experiences

This is a very diverse set of people whose common element is a desire to gain knowledge and skills with an associated qualification to improve their life opportunities. Provider websites emphasise a willingness to explore with each person the opportunities available, including the use of enabling and other pathway qualifications that provide a route to the desired bachelor level degree.

To support assessment of the potential for study, higher education providers may use aptitude tests, like the Special Tertiary Admissions Test (STAT), and consider the wealth of support material an applicant can provide. The completion of micro-credentials may provide a further means for people to establish capability for more extensive studies in the future.

Implications

The approach to the admission of applicants from the three non-school-leaver pathway groups may have served as a model for the shift in school leaver admissions from intense selectivity to far greater use of selection based on each person's suitability.

For these groups, the selection process has long been a considered mix of previous education outcomes, aptitude tests, and individual interest backed with transition pathways for those not yet suitable for the course they aspire to.

Where those admissions are in close competition with school leaver applicants, universities either ascribe a selection rank to the applicant or have allocated streams of places.

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[37] UAC response to discussion paper, p2

Section Seven: the link from senior secondary education to higher education

Key points

- While there are 15 national senior secondary subject frameworks, each state and territory curriculum, assessment and certification authority is responsible for the structure and organisation of their senior secondary curriculum and assessment practices.
- Nearly 80% of the school age cohort complete a SSCE or equivalent.
- The proportion of the year 12 age cohort that receive an ATAR varies between a little over 30% to nearly 60% across the jurisdictions.
- For higher education providers to achieve higher levels of enrolment requires admission pathways for both school leavers with an ATAR and those without.
- The learner profile proposal under development could invert standard assumptions, such that future admissions could become a question of the student choosing the provider who best suits the student.

Eight school systems

Each state and territory is responsible for the organisation of senior secondary education, across all schools in their jurisdiction. They assess and report on academic achievement results in their own way, which are then used to create the ATAR, whether by the school system or tertiary admission centre.

- This ranges from jurisdictions where around 60% of students completing the SSCE gain an explicit ATAR, such as NSW and SA, to WA where just over 30% of students who complete the WACE have undertaken study that results in an explicit ATAR.
- Victoria has experienced growth in students completing the VCE without final exams, whereby the study has been done but not the final assessment, with consequence that an ATAR is not determined.
- Queensland reformed its approach to senior secondary assessment, including an external assessment to contribute between 25% and 50% of a student's subject result in general subjects. In parallel, Queensland also moved from the 25 point Overall Position scale to the 2000 point ATAR scale in 2020.
- The ACT remains a contrast, with the SSCE reflecting the cumulation of units of study across Years 11 and 12. This means ACT's students have a clear idea midway through Year 12 of their final results, in a way students elsewhere do not.

The Senior Secondary certificate

Achievement of a SSCE or equivalent is a long-standing assumed requirement for entry to a bachelor degree.

The SSCE are highly flexible qualifications that support young people access a wide and varied range of learning options while at school. As the Queensland Curriculum and Assessment Authority puts it:

> "The SSCE certifies a quality and quantity of learning. They are a measure of what a young person knows and can do. Student achievements are recognised through the application of fair,

accurate, valid and reliable assessment of their learning and clear, comprehensive and useful reporting of their achievements to assist them with their transitions to the next phase of their lives. The ATAR is not a measure of senior secondary schooling achievement."[38]

Table One sets out for 2021 for each state, territory and Australia the estimated population[39] for the whole of the relevant age group and the proportion of that population who:

- completed a SSCE without an ATAR - over one quarter;
- completed a SSCE with an ATAR – just over half;
- completed an international baccalaureate and received an ATAR equivalent rank – around one percent; or
- did not complete a SSCE or IB – one fifth.

Table One: Education outcomes by end of Year 12 (2021)

	Estimated population[40]	%SSCE without ATAR[41]	%SSCE with ATAR[42]	% IB[43]	% non SSCE or IB
NSW	92,218	14%	59%	1%	26%
ACT	5,243	30%	54%	3%	13%
VIC	73,432	22%	62%	1%	15%
Qld	63,685	38%	43%	1%	18%
SA-NT[44]	23,224	31%	57%	2%	10%
WA	31,774	46%	33%	0%	21%
Tasmania	6,154	26%	32%	1%	42%
Australia	295,730	26%	53%	1%	20%

It shows considerable differences across jurisdictions: NSW, SA and Victoria have around 60% of the relevant population allocated an ATAR, compared with WA and Tasmania at just above 30%. The challenge of low proportions of the Year 12 group attaining an ATAR is cited by several of the WA universities.

- Curtin: "In WA, the shrinking ATAR pool has driven the need for alternate admission practices to ensure secondary school students have access to university education opportunities"
- Murdoch: "The difference in outcomes between "ATAR Courses" and "General Courses" are quite wide and specific"
- ECU: "In Western Australia, each year fewer Year 12 students obtain an ATAR, with concerns from students and parents about reliance on final exam performance and a desire for alternatives that better reflect individual capabilities…

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[38] QCAA response to draft submission considered by HACAT working group
[39] "The potential Year 12 population is an estimate of a single year age group which could have attended Year 12 that year, calculated as the estimated resident population aged 15 to 19 divided by five" https://www.acara.edu.au/reporting/national-report-on-schooling-in-australia/national-report-on-schooling-in-australia-data-portal/year-12-certification-rates
[40] Data provided by ACARA
[41] Calculated based on data provided by ACARA and tertiary admissions centres
[42] Calculated based on data provided by tertiary admissions centres
[43] Calculated based on information from https://ibaustralasia.org
[44] SA and NT are combined as separate data was not available from the SA Tertiary Admissions Centre

- WA universities have responded by offering university preparation courses and non-ATAR pathways to bachelor study"[45]

The level of year 12 achievement

The structure of each certificate is specific to the state or territory, while seeking to provide national confidence that students from each system achieve similar outcomes. It is the study results, variously expressed in each senior secondary system and summarised in the SSCE, that express what a student knows and can do. Each jurisdiction permits various packages of study that leads to a senior secondary certificate of education, only some of which will lead to an ATAR being issued. The ATAR is tied to completion of sufficient courses oriented towards future university study.

The ATAR places students in rank order. Year to year the knowledge and capability of students with a given rank, e.g. 83.75, is likely to be similar to students with the same rank in the following year. Over a longer period, the level of achievement may have risen or fallen. It is that underlying achievement that higher education providers build from in degree programs.

The Australian Parents Council cautions that the level of knowledge attributed to senior secondary certificate of educations may not be as definitive as suggested:

> "The discussion document has an unspoken assumption that results at senior secondary level and previous university studies provide clear information about what students know and can do in ways that would allow a match of student and future course requirements".[46]

If the use of the ATAR continues to become more targeted to selective courses, focus could return to the SSCE and the levels of knowledge and skills they attest as the basis for planning a suitable learning and training pathway. Bond University commented on the discussion paper:

> "Relying on school results, or a combination of school results and ATAR during covid, enabled universities to assess the effectiveness of alternative school-based admissions requirements and compare student performance against those that previously came with ATAR. Most universities assess equivalent overseas qualifications based on high school grades and are therefore capable of considering academic performance across six years of secondary schooling as an indicator of academic capability, and the resulting likelihood of succeeding at university studies. These processes are potentially a better predictor of student success, particularly for programs that don't have a quota or are highly selective."[47]

Students with the International Baccalaureate

About 1% of senior secondary students choose the International Baccalaureate instead of the State or Territory Year 12 certificate in 2022[48].

The formal advantage of the IB is that it has immediate recognition for admission to higher education in many countries of the world. In its initial years the focus was school students living outside their home country, due for example to their parents' employment, who wanted a simple

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[45] Responses to discussion paper Curtin, p1; Murdoch, p1; ECU, p1
[46] Australian Parents Council response to discussion paper, p2
[47] Bond University response to discussion paper, p1
[48] IB 2022 states 2431 students completed the IB, down slightly from 2654 in 2019 .

means to return to their home country's education system. It also appealed to Australian students considering higher education study in other countries rather than Australia.

The IB has a particular educational curriculum and structure that some students may prefer. This could explain its take up by Australian students, few of whom look internationally for undergraduate education.

The ATAR ranks students against their whole age cohort, which includes the students who complete the IB. This means that notionally each IB student is within the ranking but a rank for an individual is not determined. The tertiary admission centres use evidence from previous cohorts of IB and non IB students – whether initial higher education results (NSW, Qld, and SA) or the Victorian General Achievement Test - to align the IB scores to a particular rank, slightly inflating the number of students those ranks should have.

Allocating the ATAR

A better understanding of where strict ranking of applicants is needed allows for a better discussion of where the ATAR remains useful. It attracts confusion based on misunderstandings of how relevant a particular rank is to an offer.

The NSW Universities Admission Centre describes the ATAR as:

> "a number between 0.00 and 99.95 that indicates a student's position relative to all the students in their age group (i.e. all 16 to 20 year olds in NSW). So, an ATAR of 80.00 means that you are 20 per cent from the top of your age group (not your Year 12 group). …
>
> The average ATAR is usually around 70.00.
>
> If every school student went on to achieve an ATAR, the average ATAR would be 50.00. But because some students leave school early and the ones who stay on to receive an ATAR are a smaller, more academically able group, the average ATAR is higher."

This makes clear that all senior secondary students, and those who left school before Year 12 is completed, are within the spread of ranks but they are not all given a public rank. An ATAR is allocated only to those students who complete the SSCE with an eligible package of studies.

The precise way in which the ATAR is determined varies across the state and territories, reflecting the differences in senior secondary certificate of educations across the jurisdictions. The process is overseen by the Australasian Conference of Tertiary Admission Centres.

The problem the ATAR creates is not its calculation and use but that it is the shorthand term regularly used to define who is suitable for higher education. It exerts considerable sway for being the assumed standard outcome for school students. This is under pressure from the growth in Year 12 study patterns that do not deliver the scored study outcomes necessary to allocate an ATAR to that student.

Driven by policy ambitions to lift the level of higher education attainment, the response of higher education providers to the large groups of ATAR and non ATAR school leavers has been to create admission pathways for both. This in turn may have encouraged senior secondary students to opt away from subjects that would lead to them gaining an ATAR.

VTAC indicates that public understanding of the different pathways is growing:

"Public perception and cultural understanding of the ATAR is also in transition. … Increasingly, tertiary courses are using criteria in addition to, and instead of the ATAR, for course entry, and VTAC is engaging with multiple research groups who are establishing new ways of measuring students' capabilities and potential for success.

Media reporting and shifts in culture within schools have contributed to an increased understanding in the community that an ATAR is not required for all tertiary study options."[49]

The learner profile, a new approach to designing, assessing and reporting school learning

Learning Creates Australia https://www.learningcreates.org.au/ is supporting the development of a different way to design, assess and report school learning outcomes. Much of the research to support this is being led by Professor Sandra Milligan of the Assessment Research Centre at The University of Melbourne https://education.unimelb.edu.au/arc.

Learning Creates argues that "a better recognition system in Australia would assess and represent for each young person the degree to which a learner has attained the full range of learning they need to thrive and would support a learner to represent their learning regardless of how, where or when they learned it… To thrive, a learner needs both breadth and depth of learning. Such learning should encompass attainment of the basic literacies and numeracies and mastery of discipline or domain knowledge. But it should also include knowhow in applying knowledge to create value for society and competence in general, transferable capabilities and dispositions."

This argument leads to a different approach of matching school students to their future education course. Rather than higher education providers selecting which students best suit them, the students would choose the provider who best suits the student.

The SA Board for its Certificate of Education is part of the trial. It describes its intention as aims to:

"reframe the purpose of senior secondary education to recognise and showcase a holistic, 360-degree representation of student achievement. This incorporates their deep discipline learning as well as the identification, recognition and valuing of students' capability development.

This will require a shift in curriculum and assessment approaches and in teacher pedagogical practice. Teaching and learning programs will need to deliberately design for opportunities for students to develop and evidence their capabilities and the process to record and represent student development of capabilities (a Learner Profile).

The intended impact is a student-centred program of learning that aims to support students to develop the knowledge, skills, and capabilities to best prepare them for their post school (tertiary) pathways."[50]

The University of South Australia supports the initiative but cautions that it too could challenge students from disadvantaged backgrounds:

"Individuals within underrepresented groups and cohorts often have an increased number of additional responsibilities outside of school study (such as family responsibilities, or needing to balance part-time jobs). These individuals can be disadvantaged by at-school offers based on Year 11 grades. Similar disadvantages may occur for this group in the use of Learner Profiles, so

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[49] VTAC response to discussion paper, p4
[50] SACE Board response to discussion paper, p2

UniSA supports the South Australian intention to shift assessed activities earlier, into Year 10 and Year 11."[51]

Many other responses to the discussion paper urged the need for a 'holistic' assessment of the applicant as the means to ensure an effective match of student and course.

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[51] UniSA response to discussion paper, p4

Section Eight: Admission practices for recent school leavers

Applicants seeking to transition immediately from school to higher education, including with one to two years' gap, comprise around 40% of applicants each year.

To gather more information about current admission arrangements, with a focus on school leavers and the growth of at-school offer schemes, several provider websites in each state and all tertiary admission centre websites were sampled. The intent was to gain a better sense of how admission options are presented to potential applicants, the basis for assessment and the operation of the schemes.

The sampling was intended to be illustrative not comprehensive.

Key points

- Most universities have a suite of admission pathways for recent school leavers that cater for both applicants with an ATAR and those without.
- Many universities publish the level of ATAR, and sometimes senior secondary results, that will ensure an offer.
- Some universities in every state and the ACT have at-school offer schemes.
- It is close to standard that at-school schemes require completion of a senior secondary certificate of education before a final offer is made.
- Other than NSW, the at-school offer schemes link back to a tertiary admission centre application, explicitly retaining the potential for the student to subsequently accept a different offer. Students in NSW are likely to have applied in parallel through UAC.

Australia

The examination of the websites confirms that:

- the modal mechanism for school leaver admission remains the completion of an ATAR eligible SSCE;
- there are several other means for school leavers to demonstrate suitability including completion of university units while at school, evidence of personal achievements whether in sport, life or work, and consideration of hardship factors;
- for applicants coming with VET qualifications and life and work experiences, universities offer a mix of aptitude tests, consideration of previous studies, enabling and other sampling of university study, and consideration of personal achievements and goals to find a suitable course.

Overall, the providers emphasise finding a suitable course for each interested student, with due account of achievements to date.

Guaranteed offers

Many universities publish the selection rank, ATAR level, or sometimes Year 12 Certificate marks combinations, that will guarantee an offer for a course. The guarantee is for the ATAR part of the selection criteria. Prerequisites and other requirements must also be met.

Where listed, the guarantee covers most to all courses. Some, as in WA, indicate a common selection rank above which entry to all but a few courses is likely. The course exceptions tend to be courses that have strict limits to numbers and consequently very high selection rank cut offs.

Non-ATAR schemes for school leavers

Many universities, including all in WA, set out ways for applicants to achieve the necessary selection rank that does not use, or does not rely wholly, on senior secondary results as ultimately summed to produce the ATAR. These include:

- presentation of portfolios of information, highlighting student activities and achievements, considered relevant to establishing suitability;
- external tests of aptitude, also used for applicants seeking to return to formal education;
- completion of pathways studies whether formally enabling courses or other study;
- specific high level student activities, such as notable achievements in leadership, community action, or sports.

At-school offers

From the consultations and review of websites there are several types of schemes:

- school recommendation schemes, often with emphasis on students whose study outcomes understate their capacity for reasons of personal misadventure or disadvantage;
- judgement that school results (year 11, year 12 where available) indicate high likelihood of suitability;
- university access schemes where one or two (up to four) university units are completed while at school;
- student leader-achiever schemes.

The requirements for the at-school offer usually include completion of the SSCE, any prerequisites for the course, and English language capability.

The state-by-state arrangements vary.

Queensland, Victoria and SA (covers NT) have agreements to direct all offers to school leavers via the tertiary admission centre. Offers prior to release of school results will be made through the tertiary admission centre, or if made directly, the final confirmation is through the tertiary admission centre once all conditions have been shown to be met. Reference to "early offer" schemes is through university websites, with little to no explicit reference on the tertiary admission centre sites.

NSW and ACT universities administer many at-school schemes directly, with emphasis on those based on numeric criteria such as school grades. Other schemes involving school recommendations and assessment of student disadvantage are run through UAC.

WA has a highly systemic approach with the framework elements set out by the WA Tertiary Institutions Service Centre (TISC) and each university detailing its own schemes and criteria. These arrangements have integrated at-school offers into the standard set of opportunities for school students.

NSW

Many of the NSW universities have at-school schemes that target the higher achieving students.

- They use year 11 results to assess general suitability and from there decide whether to make an offer.
- The approach tends to capture students likely to receive an offer through the post school results offer rounds. That is, it brings forward the confirmation that there is a place, while leaving open that more preferred courses could be offered later in the process when the final number of applicants and their selection ranks are clear.
- Students are required to complete the NSW Higher School Certificate (HSC) or IB, usually to be eligible for ATAR (or equivalent), and for some courses, a specific ATAR above the level the university would expect for all entrants. This again is consistent with the relevant students being on track to a mid to high ATAR and offer.

Several universities are guaranteeing places will be offered to all applicants with ATARs above certain thresholds. This remains a post-results offer, but gives students some certainty depending on how good ATAR predictions are.

Ten of the universities run school recommendation schemes (SRS) through UAC – the exceptions are Wollongong, UNSW and Sydney.

- These combine a student's Year 11 results with a school assessment of capability. How the latter is assessed is an internal university consideration. UAC recognises that not all schools will provide an assessment.
- The offers are usually said to be a mix of conditional (Year 12 completion, perhaps a threshold ATAR) and unconditional. The latter imply that once the judgement is made, the university will hold to it, but some cases do include requirements.
  - While not clear what impact the school assessment has, the appearance is that the SRS also targets students showing academic potential at school. It could be that the recommendation assists some gain entry to a course they might fall short of otherwise. UTS is explicit that it targets entry where the ATAR itself may not have been sufficient.

Equity schemes such as Education Access Scheme (EAS) operate distinctly, attempting to gauge where hardship and disadvantage have prevented the applicant from doing as well as they could through school but could do so if permitted to enrol in the HE course.

UAC coordinates the SRS, EAS and many of the equity programs. Guaranteed entry thresholds are applied during the ATAR-based offer rounds in December and January.

Universities administer the at-school offers based on Year 11 results only. Access to those results is automated through support from the NSW school systems. Interstate applicants need to provide their results. This means the university direct applications and offers target objective quick decisions. More complex assessment of school inputs and information about individual's disadvantages is run through UAC.

Queensland

QTAC's website appears to have no reference to at-school offer schemes. It oversees an Educational Access Scheme that considers financial and personal impacts on study. If supported, adjustment points may be added to the ATAR to determine the applicant's selection rank.

The university websites set out the basis for at-school schemes, which work to the pattern of:

- students register with QTAC and upload an application, with their initial list of course preferences;

- they then either
  - apply to the university, providing relevant information – e.g. University of Southern Queensland (USQ)
  - get an email from QTAC if applying with e.g. Queensland University of Technology (QUT) course listed in top 3 preferences, inviting an application, allowing applicants to upload data if they wish;
- university confirms that an offer is to be made (QUT site is not specific about who is sending the emails but seems to make more sense to come from the university);
- applicants need to ensure that the relevant course is listed as number 1 on their QTAC preference list
- QTAC issues offer – in advance of final results
  - timing is driven by each university so is not uniform: USQ from August, QUT post senior secondary exams;
- Student can conditionally accept, allowing them to place other courses higher in their preference list and be in scope in future offer rounds.

The array of options open to Year 12 students is shown by the University of the Sunshine Coast (UniSC) summary:

> "completing a QCE, as a standalone senior statement, does not provide students with a selection rank to be admitted into a university. These students are therefore required to enter via:
>
>   - obtaining an ATAR;
>   - completing a Certificate III, Certificate IV, Diploma or Advanced Diploma while still at high school;
>   - completing two university courses through extension studies such as UniSC's Headstart program;
>   - a school-offer program such as UniSC's Early Offer Guarantee; or
>   - pursuing enabling/bridging studies after Year 12."[52]

Victoria

VTAC's website appears to have no reference to at-school offer schemes. There is agreement among universities that all offers to school leavers will be made through VTAC. Universities with at-school offer schemes administer them during Year 12, assessing suitability against criteria, indicating the indicative intent but with the formal offer via VTAC through the rounds from December onwards. The schemes have several different target groups and associated criteria. Completion of the SSCE is explicitly required in all schemes sampled.

The La Trobe University Aspire program has several distinct elements which cover a breadth of target sets of students: from those with good results in school, those with active community service records, those whose results may not fully reflect their potential, to those who enrol and succeed in university level units or micro learning modules.

There are examples of guaranteed entry to courses for ATARs of relevant rank (e.g. Swinburne University of Technology) or of entry to a suitable course, ultimately determined once school results are known (Victoria University).

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[52] USC response to discussion paper, p2

South Australia

The South Australian Tertiary Admissions Centre (SATAC) website appears to have no reference to at-school offer schemes. It does alert to conditional offers to make clear that those conditions need to be met for the offer to be formalised.

Two universities guarantee entry to most of their courses for achievement of set ATAR outcomes, one of them also uses South Australian Certificate of Education (SACE) marks in the same way. In this way the students can both target the more objective measure of the SACE marks and the relative target of achievement compared with others in the state.

The University of Adelaide created an at-school scheme in response to the uncertainties of COVID-19. It targeted students achieving A's and perhaps B's in SACE Year 11 results. It is reviewing the need for the program. From the consultations it appears unlikely to continue the scheme.

Flinders University has a set of schemes that operate alongside ATAR entry. As well as the common practice of considering Year 11 results and school recommendations it allows use of UniTEST and results in the SACE research project module to create a selection rank distinct from the ATAR or combining both factors. The driver is to give applicants several objective ways to demonstrate their capacity and relative selection rank.

Western Australia

In contrast to other states, TISC provides a comprehensive guide to the at-school approach in WA, highlighting the common approach across all the universities and its highly systemic operation. All applications through TISC are considered automatically against the at-school criteria and offers generated where the criteria are met. It is presented as a standard part of the WA process.

Curtin University, ECU and Murdoch University each use a selection rank of 70 or above as a marker of general suitability for most of their courses. The University of WA (UWA) uses a selection rank of 80 is a similar way. The universities each set out various ways to achieve the necessary selection rank:

- treating the ATAR as modal but not the standard model;
- how students with WACE with general rather than WACE ATAR studies can demonstrate suitability;
- students with WACE and a Certificate IV;
- use of portfolios or similarly the UWA's experience-based entry estimator.

Where students sit below the threshold, the universities set out ways to achieve necessary level such as through study at sub-bachelor level, enabling programs and the like.

Independent higher education providers

The websites of several independent higher education providers were also examined, revealing that:
- Some sites are a perfect reflection of admission transparency requirements, with information for the four sets of potential applicants and the required data table. Others are fairly short on detail with emphasis on selling the provider's courses.
- All refer to 'early offers'. Some set within the NSW-style framework using direct and tertiary admission centre. For some it is not clear what is 'early' about the offer. It is clear the provider

will accept the application if the student completes the SSCE. These may be a mechanism to make an offer following consideration of the application consistent with tertiary admission centre requirements without waiting for the post-school results rounds.

Section Nine: The challenge of at-school offers

Key points

- There is considerable dissension about the impact and value of at-school offer schemes.
- The main themes raised against their use are the impacts on:
    - senior secondary systems and students' learning outcomes;
    - the students, both those with and without an at-school offer, considered for fairness, with associated concerns about integrity of admission decisions; and
    - higher education learning outcomes, if students with an at-school offer are less well prepared for their higher education course due to easing back on the final stages of senior secondary education.
- Proponents argue the value:
    - of responding to applications as they are made to indicate, where feasible, whether the applicant is suitable;
    - from preparing students for the next stage of their education, before the former is complete; and
    - from giving students an element of certainty that allows them to plan ahead and aspire to other courses they may be competitive for.

The at-school offers debate

At-school offers was the major point of dissension in the HACAT, the Working Group on admissions developments, and throughout the consultations and responses to the discussion paper.

There are strongly contrasting views among the universities about their use, albeit the larger group support their use. The response of those representing students and parents is of wary support, subject to arguments for greater certainty about how the offers work, the need for good clear information about them, and a focus on students being set up for success.

The Australasian Curriculum, Assessment and Certification Authorities, voiced very strong arguments about the impact of at-school offers on senior secondary students, the standing of the senior school certificates, and the future capability of students if they are not completing Year 12 to their best abilities. Representatives of school systems and principals echoed those concerns but saw potential in the well-ordered use of at-school offers.

The provider input, and the sampling of websites, has strengthened understanding of the use of at-school offers, which supports the debate focussing on the current practice.

Input from schools

Several schools responded to the discussion paper, in addition to the consultation meetings with several non-Government school groups' national bodies and with the Catholic system's principals' network.

St Stephens School in Perth provided two contrapuntal points. It endorses the concern:

> "students don't apply themselves to their full potential; knock on effect of this on classes in each subject, particularly salient in small classes (affecting the results of others)"

and supports changes that would provide:

> "more pathways to achieve goals - more tailored, individual ways to obtain entry (rather than one pathway for entry) and opportunities for students that are comparable to workers [such as] flexibility of entry, hybrid models, agility of offerings. School at this level must reflect more "real-life" models[53]."

The Hale School in WA supports use of at-school offers targeted to students from disadvantaged backgrounds. To assess the impact of such schemes requires:

> "careful longitudinal analysis of subject scaling distributions, at both individual school and state-wide level, to detect evidence of association between the proportion of students receiving At-school offers and subject scaled scores, i.e., is there evidence of downward performance trends among students who take up At-school offers? And, if so, is there evidence that these students are impacting their school cohorts in ways that disadvantage other students in those same cohorts?"[54]

University actions and comments

In response to the concerns, the New South Wales Vice-Chancellors' Committee developed five-key principles to guide use of at-school offers whilst maintaining the benefits that accrue to students[55]:

1. universities, as self-accrediting institutions, are responsible for their admission policies and procedures, consistent with the Higher Education Standards Framework (Threshold Standards)
2. university admissions practices should be cognisant of the needs of students and ensure that those students admitted are capable of succeeding with appropriate support
3. admission practices should be evidence-based, transparent and publicly defensible
4. admission practices should respect and support the integrity of the HSC and are conditional on the completion of the HSC
5. early offers for 2024 (with one agreed and unavoidable exception) will not be issued before September 2023.

Monash University argues:

> "The ATAR-based entry process is designed to incentivise students to perform to their maximum potential and early offers detract from performance. The practice of early offers allows for the blurring of the admission transparency measures Australia has worked hard to implement.

> Should any universities utilise at-school offers this may give them a perceived competitive advantage against those which do not. The ultimate outcome would be the adoption of this process by all universities to maintain competitiveness, with the early adopters losing any advantage they had along with admissions transparency and student performance."

The University of Sydney is concerned that even with the NSW agreed rules:

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[53] St Stephens School, Perth response to discussion paper, p1
[54] The Hale School response to the discussion paper, p1
[55] https://www.nswvcc.edu.au/

> "It does not address the lack of transparency regarding the criteria on which at-school offers are being based."[56]

ECU argues the at-school offers became common during Covid but now need review and tightening. It supports that

> "at-school offers have resulted in some students not achieving their full potential in Year 12 and potentially led to students entering university when they are not fully prepared"[57]

The University of South Australia opposes at-school offers:

> "At-school offers increase marketing pressure and competition for a vulnerable cohort at a vulnerable time in their studies." [58]

The types of schemes

As set out in Section Eight there are several types of at-school offer schemes:

- school recommendation schemes, often with emphasis on students whose study outcomes understate their capacity for reasons of personal misadventure or disadvantage;
- judgement that school results (Year 11, Year 12 where available) indicate high likelihood of suitability;
- university access schemes where one or two (up to four) university units are completed while at school; and
- student leader-achiever schemes.

The typology is descriptive and not intended to become prescriptive. There is considerable overlap, with many of the schemes targeting school students with higher level grades at school requiring school input against criteria.

The first type of scheme, targeting those who might otherwise miss out on competitive places, is the more long-standing. It attracts least concern and attention. Its target group is ultimately small and likely set for under-achievement by definition, and potentially at the margin of senior secondary success. Schemes that offer a positive opportunity ahead can prove the means to hold them to education and better success both at school and beyond.

The second appears to be the area where numbers have grown substantially. Since it is based on an analysis of academic results it is easier to expand, using automated assessments of the applicant's standing against pre-determined thresholds. Automated systems permit as a standard procedure that all applicants listing a course will be considered, with no explicit request from the applicant for an at-school offer or the provision of further information.

There is less information about the extent of the third type of enrolments in university level units while primarily a secondary student. Many of these schemes target high performing students. Others such as the ECU and Murdoch University preparation courses target students not on an ATAR pathway, with positive school feedback about their value for students. The capacity to support these

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[56] The University of Sydney response to the discussion paper, p3
[57] ECU response to discussion paper, p2
[58] UniSA reponse to discussion paper, p3

schemes is limited, which suggests the number of students will remain modest unless there is a fundamental shifting to integrate secondary with the beginnings of higher education.

The growth in VET studies in school is a parallel case, but one that draws on the history of VET being an alternative to senior secondary studies rather than a follow on qualification.

The fourth type selects a small number based on an individual trait, which could be in sport, arts, community service, or employment. These options are most open to the risk of effectively excluding many who do not have the initial opportunities required. They lead to admission to a course along with many others – they are unlikely to cause another aspirant to miss out on a place. The question is more the fairness of the recognition and attention the program adds.

The argument is not dissimilar from using the ATAR to order admission. Those that have used their abilities to their best are more likely to get entry. In these cases the areas of action are wider than academic studies but recognise other traits society deems important.

The arguments against at-school offers

The following sections consider the more significant concerns raised about at-school offers and provides an initial test of their strength.

Impact on senior secondary systems and students' learning outcomes

Curriculum, assessment and certification authorities, some universities and some school principals are concerned that at-school offers:

- encourage students to ease back on school study and either not complete the senior secondary certificate of education or do less well. This is linked to claims offers are 'unconditional', such that completion of senior secondary certificate of education is not required;
- undermine the validity and stability of the SSCE for all students;
- forces pressure back onto Year 11 assessments that they are not designed to withstand.

The impact on the coherence and validity of the SSCE is a major challenge that at-school offer schemes need to address through further discussion with the school authorities. Concerns such as the potential for students with offers to underperform in cohort aptitude tests used to moderate individual subject results across school and subjects is one example of a potential spill over impact.

As shown in Section Eight the schemes almost always require completion of the senior secondary certificate of education. The real issue is whether such schemes lead to students retaining less learning and capability than they otherwise would. The consultations have brought examples both ways.

Data collected by universities on how students perform (see below) suggests no detriment to date. UWA has compared its estimate of a student's likely ATAR against that received and found close alignment, suggesting that the relative performance of those students remains the same[59]. The school systems have not indicated whether their data on senior secondary learning outcomes shows any decline that can be associated with at-school offers. The bias towards high ATAR students in the

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[59] Advice from UWA

growth of direct applications in NSW, ACT and WA does not suggest those students eased back in their studies.[60]

The use of senior secondary results from Year 11 and part of Year 12, where it is the basis for an at-school offer could affect the way schools and students approach those assessment tasks in future. In its initial years during COVID-19, the Year 11 results used were determined prior to anyone knowing that they could be used for an at-school offer. Now that the use is known, the argument is strong that the students, and as a result teachers, will be more concerned about the marks, reducing the assessments' value as a learning tool. There could be a risk if higher education providers are relying on those results to be precise and predictive enough to determine between two applicants.

From the university perspective, the use of university students results prior to the completion of an undergradauate degree is common for graduate programs such as the Graduate Entry Medical Schools Admission System (GEMSAS), and for graduate recruitment. Grade Point Average (GPA) that average out results from all years of a degree are often used. In the consultations, schools' organisations pointed to students lining up apprenticeships and traineeships before Year 12 ends as being well accepted and not considered antithetical to good ongoing study outcomes.

Impact on the students

Several concerns about the fairness of at-school offers for all students have been raised.

- The appellation 'early offer' indicates the sense that receiving an offer while at school is too soon, and potentially unfair to others who need to wait for the post-school results process to roll out.
- Doubts about which higher education providers were using at-school offers and with what targets. If students need to know when and how to be considered, there is concern that those least understanding of the systems involved are more likely not to be included.
- Concerns that students lock into the offered course and do not consider options further.
- Concerns that the process sidesteps the usual ranking of offers in competitive courses.

The responses from parent, student and school groups downplays negatives from some students receiving an offer and others not. There is much more concern about equal access to at-school schemes in practice. The more bespoke they are, the extent of additional action by the student and additional material from schools and other supporters the greater the concern.

Several of the concerns circle around how well students, parents, advisors understand the schemes and the value from remaining active in the application process for other courses until students are confident they have the best offer they can achieve.

The NSW and ACT Universities Admissions Centre (UAC) reported support for the impact on individual students:

> "Informal research conducted by UAC found that 67% of students who had received an early offer felt less stressed because of it; 60% said it helped them to do their best in the exams; and 77% said it improved their sense of achievement in Year 12."[61]

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[60] Analysis for HESP of 2021 direct applicants compared with TAC applicants
[61] UAC response to the discussion paper, p2

VTAC argue that the involvement of the tertiary admission centres is important to integrating at-school offers and avoiding complexity that could deter some students and advantage others:

> "Students from more advantaged backgrounds or those attending well-resourced schools are more likely to have access to the resources and support needed to understand the full range of at-school offer programs and prepare competitive applications. Resource-intensive application processes can create an uneven playing field and limit opportunities for students from disadvantaged cohorts.

> This impact could be mitigated through a centralised platform for at-school offers, and/or integration with the existing application systems run by tertiary admissions centres. The tertiary admission centres were initially created to provide efficiency and access to learners and providers for the formal offer process and alleviate the impost of multiple applications, and there are concerns that the rise in distinct at-school offer programs has reimposed this burden."[62]

The University of Melbourne supports use of the tertiary admission centres to administer at-school offers and requirements to avoid students with multiple offers causing delay in offers to other students:

> "Another issue is the trend towards students possessing multiple offers at a given time, having received an at-school offer as well as a separate offer via a standard tertiary admission centre application. This trend has the potential to impede access to highly selective courses where the number of offers made is limited. ..One way of achieving a balance on this issue may be to develop different approaches to "selective courses" and "accepting courses", and to consider measures to limit the capacity for students to hold multiple offers for selective courses for a prolonged period.[63]

The impact on higher education

Student performance at university

The major concern for the impact on higher education is whether the at-school offers lead to those students performing less well than expected at university.

In response to concerns that the students receiving at-school offers may not perform as expected at university, several universities active in using at-school offers have shared the outcome of studies to review how those students perform. They compare the university achievements of students who received at-school offers with other students who did not but who otherwise are comparable. The advice from Curtin, La Trobe, USC, and UWA, is uniform that students who receive at-school offers perform on a par with other students and in some studies better.[64]

Such studies are a regular action for universities across all admission pathways. SATAC is planning to develop better predictive models:

> "Working with key stakeholders and relevant datasets, we intend to develop predictive data models to understand the likelihood of tertiary participation and success for different learners and pathways. Therefore, learner engagement and admissions pathways can be designed to

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[62] VTAC response to discussion paper, p6
[63] The University of Melbourne response to discussion paper, p4
[64] Responses to discussion paper or advice in consultations (UWA)

deliver improved outcomes in priority areas, such as proportionate participation and success for students from under-represented groups"[65]

University competitive manoeuvring

The consultations and responses brought out several concerns about the role of at-school offer schemes in the competitive manoeuvring of individual universities, each seeking to optimise student numbers. These arguments are based in institutional gain from making an offer first to a particular student, on the basis this begins to bind the student. Hence, as more universities make at-school offers, the others are forced to follow. A particular thread in consultations was that this could lead to offers being made in increasingly earlier years of high school.

The robust nature of university positioning and competition for students should not be underestimated. It also applied to arrangements prior to growth of at-school offers. If at-school offers alter the competitive dynamic, there is no certainty that the status prior was necessarily better.

The more challenging argument made is that at-school offers make the selective entry courses much harder to sustain – on the basis that many students who would preference such a course are content to remain with an at-school offer if received. If so, some consideration should be given to why the student makes that decision. Loyalty to the offering university seems unlikely. There is potentially a conflict between selective and accepting courses that may need to be resolved in favour of the selective courses.

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[65] SATAC response to discussion paper, p3

Section Ten: a framework for at-school offers?

Key points

- A framework for the use of at-school offers is needed to improve confidence in their use and support better understanding of them across all parties.
- The framework should cover:
    - requirements to complete a SSCE and the meeting of other requirements of the university course;
    - meeting the information needs of students, parents, schools and other student advisors;
    - students being encouraged to remain active in the applications process through to the end of offer rounds;
    - timing of when at-school offers are made, being at most 12 months in advance of course commencement; and
    - ongoing interaction with schools and school systems about the operation of the schemes.

A framework for at-school offers

The value of at-school offers and the risks they pose have been the leading admissions development issue throughout the consultations. Several aspects emerge that are essential if the at-school approach is to advance the outcomes suggested in Section Two. The following section sets out ways in which future at-school offer processes could proceed that reduces the risks identified while maintaining the identified benefits.

The framework is intended to support good decision making about future arrangements by all the parties involved, governments, higher education providers and school systems.

Students should complete a senior secondary certificate of education for the offer to be confirmed

In examination of tertiary admission centre and provider websites, and from the responses to the discussion paper, no scheme has been identified that would accept cessation of secondary education at the point of offer.

The clear majority specify that the SSCE be completed. Most expect completion of an ATAR eligible SSCE or IB diploma. Where a course has prerequisites (e.g. maths as part of the SSCE) these remain. Some courses require minimum ATAR or subject results.

Spell out the requirements for the offer to be confirmed

Parent and school groups indicated that school students are not always aware of the requirements, regardless of whether the provider considers the information is provided. This requires action from several directions to reduce the risk of students not being clear on requirements.

- Providers to check and potentially strengthen the information they provide.
- Improve awareness among students, school staff and families of how at-school offers are part of the admission arrangements.

Students to remain part of offers process in future rounds

Students should be encouraged to remain active in the application process through the period until enrolment, usually early in the following calendar year.

The arrangements in Qld, Victoria, SA and WA ensure this. The student must have a tertiary admission centre application in the system to be considered for an at-school offer and the final confirmed offer, once all requirements are known to be met, comes through the tertiary admission centre. In NSW at-school offers can come directly from the provider. Students are likely to have a UAC application as well, but this is not a requirement.

Timing of at-school offers

There are a range of views about suitable timing of at-school offers. To the extent there were offers made while students were in Year 11 during the height of the COVID-19 disruptions in some jurisdictions, none of the current schemes do so, nor have any suggested plans to do so.

The question is at which point during Year 12 should at-school offers be best targeted:

- midway through year 12 just as students begin serious identification of courses to apply for and lodging of applications with tertiary admission centres;
- well into second half of year, August to September, to ease tensions in advance of final year 12 assessment tasks and exams; or
- immediately on all assessment and examinations being complete, so there is no impact on learning but well in advance of the post results rounds?

It is important to avoid major events in the school year such as external exams and aptitude tests. The Queensland universities avoid the end of year 12 exam period, making offers before or after but not during that period. By contrast, offers were made in the ACT on the eve of the general aptitude test used to align results across schools and subjects.

Work with school systems and schools

The response to the discussion paper makes clear that better discussion between universities and the school systems and schools may have led to better extension of at-school programs and ensured better understanding of how they would operate.

Future arrangements to ensure such discussions may reduce future problems and improve the outcomes on current issues, such as:

- the use of Year 11 results as a guide to making offers is problematic for the school assessment process. It needs further discussion between the universities and school system; and
- schools ability to indicate that they consider a student has eased back in studies sufficient for the at-school offer to be withdrawn. The University of the Sunshine Coast scheme:

    "Enables schools to withdraw their recommendation for [an at-school offer] at any point before the final day of school if the student does not maintain satisfactory academic progress throughout the remainder of Year 12. This is noted on the letter of conditional offer issued to the student."[66]

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[66] USC response to discussion paper, p4

Where Next?

3. The Department of Education could work with higher education providers, the school systems, the curriculum assessment and certification authorities, and tertiary admission centres to create a robust framework for the making of offers to senior secondary students during and immediately after their senior secondary studies.

Section Eleven: Information to support applicants

Key points

- Feedback emphasises the tertiary admission centre websites as the lead sources of information about course options.
- Parents and other advisors to school students need to be targets for information about changes in the admission pathways so they can provide better informed advice.

The information portals

The direction of the past decade has been to make information digital, with some remaining hard copy resources. The digital information is provided at several sites, each struggling to hone down the vast array of potential information to that most relevant to the applicant. These include:

- Government sites such as Course Seeker, Study Australia, CRICOS and the array of linked sites at the Department of Employment and Workplace Relations Find a Course page;
- the five tertiary admission centres sites;
- each higher education provider's website; and
- commercial and other support sites such as the Good Universities Guide.

These sites have information about the courses available and cover the information applicants are likely to need to assess relevance. The weaker aspect is the search functions which battle matching the key words applicants use to describe their interests to the titles of higher education courses.

The input from the sector is that the tertiary admission centre websites are the most commonly used and relied upon of the various portals, particularly for school students.

The Isolated Children's Parents' Association Australia endorsed the suite of websites:

> "including QILT, Myfuture, Study Assist and Course Seeker which are valuable sites for our members, students and their families. This information needs to be up to date, comprehensive and readily accessible not only to students, but also to parents to ensure they can adequately support their children."[67]

RMIT commented on the challenge of national websites:

> "National higher education (HE) information websites can often create more confusion. The tertiary admission centre websites already consolidate information about available options from various providers."[68]

The University of South Australia pointed to a problem from using ATAR not the selection ranks in the Courseseeker guides to a course:

> "The base ATAR is unrealistic and should be removed from the CourseSeeker website. The inclusion of base ATAR scores instead of adjusted selection scores confuses rather than informs the public. Students in South Australia who receive adjustment factors are fully aware of their

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[67] Isolated Children's Parents' Association Australia response to discussion paper, p2
[68] RMIT response to discussion paper, p4

selection rank, and know that this – not their base ATAR – is what will be used to meet Guaranteed Entry thresholds and cut-offs."[69]

Who needs to access information?

Each change in the approach to admissions requires those informing and advising students to be across the changes and adjust the advice provided. The challenge is to ensure that students, via schools, advisors, parents, websites, are working to information about how the admission practices work today, rather than how they worked five or ten years ago.

The consultations and responses to the discussion paper highlight the importance of those around school students, most notably parents, as significant players who need to be informed almost as much as the students themselves.

They make the point that for effective discussion among students, their parents and other advisors need to be informed about current admission arrangements. Parents and other older advisors have the risk of knowing past arrangements, but not being across current developments.

The Australian Council of State School Organisations argues:

> "Actively involving families when young people search for a course of study could improve university readiness. Working with the student, school counsellors, and other school staff should design university readiness programs that intentionally include understanding, input, and buy-in from families. Counsellors and staff can help inform expectations and changes through the university search process so families can anticipate the disruptions and transitions that may otherwise cause tension in existing family dynamics."[70]

The Isolated Children's Parents' Association Australia highlights the particular challenges for applicants whose home is remote from the providers and potentially hampered for internet access.

> "Rural and remote students must be given the opportunity to obtain information in various mediums, including phone, internet and face to face through school teachers and/or career advisers to ensure they have all the information available to them as they are often unable to visit university open days to view facilities or on-campus accommodation."[71]

The Australian Parents Council reminds of the importance of parents in shaping the their children's aspirations:

> "Parents participate in, shape and influence their children's education and aspirations. The support they provide or do not provide opens doors and sets limits. The stereotype of parents expecting their children to do courses such as medicine, dentistry, law or accounting, courses seen as ways to ensure future economic well-being and security, illustrates how cultural, social and historical factors shape admissions to higher education."[72]

Where next?

4. The Accord Panel could consider the transparency and availability of information to student advisors and parents, about the admissions pathways and opportunities.

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[69] UniSA response to discussion paper, p5
[70] ACSSO response to discussion paper, p4
[71] Isolated Children's Parents' Association Australia response to the discussion paper, p1
[72] Australian Parents Council response to discussion paper, p6

Section Twelve: strengthening the network of tertiary admission centres

Key points

- The tertiary admission centres are an important part of admissions infrastructure.
- The tertiary admission centres are proposing to form a stronger national network while retaining the local presence they each currently provide.

Tertiary admission centres

The Australian higher education system is notable for the state based tertiary admission centres, created by the universities in each state by the end of the 1990s. These provide a single point to lodge applications for courses across the universities in the relevant state, several other providers and some interstate universities and providers. The tertiary admission centre websites are an important location for information about courses, supporting comparisons and selection.

The tertiary admission centres support competitive selection where an applicant can indicate interest in multiple courses in order of preference, with the relevant higher education providers then able to make offers to the applicant based in those preferences. It is a highly capable selection mechanism to sort students interested in courses across more than one provider.

The tertiary admission centres approach is predicated on an applicant only ever having one active offer at a time. In the original approach, the making of offers was tightly focused at one major offer date. The several follow up rounds allowed applicants who did not receive an offer, or one they did not wish to accept, to be considered again for remaining places.

Over the past decade, tertiary admission centres have supported providers to make offers on many dates, most prior to the traditional main offer date. This permits earlier confirmation of successful applications, but reduces the extent of comparison of all applicants. It is most relevant for courses accepting most or all applicants with suitable claims for entry. It can target applicants who have only one course they wish to apply for.

Until recent years, the first sets of offers were made to non-school leaver applicants only, whose past academic achievement was fully known. Schemes for offers to students at-school have become more common. As shown in Section Eight, the tertiary admission centres support those schemes and make possible the automatic consideration for an at-school offer of all school students listed preferences.

Applications direct to the higher education provider

Higher education providers have widened the option for applicants to apply directly to them.

Universities have become more targeted in their use of tertiary admission centres as an admissions portal, with 42% of applicants applying directly to the university in 2021[73]. These remain primarily from non-Year 12 applicants but in 2020 there was a large jump to over 10% of school leavers applicants making direct to university applications, a level maintained in 2021, with data for 2022 yet to be released.

There are considerable differences across states in the approach to direct applications, particularly from students at school. Current school students are much more likely to use direct applications in NSW (18%), WA (34%) and ACT (51%). In Victoria, senior secondary applicants are almost wholly tertiary admission centre oriented, with only 4% making direct applications. Non-school-leavers, conversely, primarily make direct applications. VTAC is the most school focused of the tertiary admission centres. Qld and SA (with NT) remain strong tertiary admission centre states, for both senior secondary students and older applicants.

The assumption is that those who apply direct to the provider have a single preferred course in mind. Some people may apply to several providers or apply both to a provider and lodge an application through a tertiary admission centre. This creates the potential for applicants to receive more than one offer, something which the tertiary admission centre system was created to avoid. The universities within each tertiary admission centre grouping have agreements about where direct offers will be used, with some agreements excluding school student applicants from direct applications.

It is likely that the older applicants, drawing on experiences in higher education, work, and other study, can be confident in targeting one provider to make an application, and if accepted prepare for study. There are more concerns about whether school students should limit themselves to one course, or otherwise by applying in multiple ways, reduce provider certainty.

A national portal or a stronger national network of tertiary admission centres?

The rapid expansion in digital capability brings with it the regular question of whether a single Australia wide admission centre makes more sense that five state based ones. This might be the route chosen if the tertiary admission centres were being created in 2023. ECU argues the advantage of a national tertiary admission centre[74]. However, the reality of the existing bodies would make moves to integrate them difficult. The gain from it would need to be clear and substantial.

La Trobe University argues:

> "TACs can help inform admissions practices by leveraging connections across higher education providers and secondary institutions. The increased emphasis on articulation between TAFE and tertiary institutions may provide opportunity to consolidate admissions across both sectors in a single portal.
>
> We also see significant value in the consistent systems used as well as consistent timings and processes. This would minimise confusion for students applying across state boundaries, reduce

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[73] The data is drawn from Department of Education applications data as received from tertiary admission centres and individual universities.

[74] ECU response to discussion paper, p3

the cost of multiple applications and, if fully consolidated, enable students to submit only one application regardless of their state of origin."[75]

One argument for retaining the existing state-based structure is the relatively low level of interstate movement for study. This could be seen as confirmation that the Australian network of higher education providers offers good options in each state. However, it could also show that without having the broader options highlighted, applicants will ignore the wider set of possible institutions and courses.

In their responses to the discussion paper, ACTAC, SATAC, UAC, and VTAC argue a strong case that the tertiary admission centres can work together better as a national network. As SATAC puts it:

> "We strongly believe there is an opportunity to improve tertiary admissions outcomes in Australia by establishing a common national approach, leveraging the significant value of the existing state-based tertiary admission centre network (ACTAC). This could be via the creation of a national tertiary admissions body (with state/territory-based presence and expertise), or via the establishment of shared infrastructure, systems expertise, and/or processes."[76]

The national network would have several objectives, derived from the ACTAC response to the discussion paper.

1. A first port of call for applicants and schools.
2. Coordinated links and presentation to other tertiary admission centres with regards to national course information.
3. Consistent pathway information with an agreed framework for describing and presenting pathways through tertiary education with focus on different cohorts and starting/end points.
4. Diversity of applications processes [that] support developments in admissions practices.
5. To improve commonality across tertiary admission centres.
6. A coordinated framework and improved streamlined process for applicants applying across multiple states.
7. An enhanced interstate applicant process.
8. Developing consistent frameworks for assessing different senior school education certificates: national and international certificates and developing learner profiles.
9. Facilitating pathways information and advice coordinate credit recognition for previous studies.

The network would do the above while retaining local support for students and the state-based aspects tied to there being state-driven school systems.

This would respond to the University of Southern Queensland aspiration for an effective tertiary admission centre network that provides the single point efficient service of previous decades and supports the array of current admission pathways:

> "The identification and adoption of innovative interstate and international practices, with a possible national application 'umbrella' platform could provide systemic value for the sector. Seeking a better understanding of why so many applications for admission occur outside of tertiary admission centre facilitated processes may identify what needs to be introduced by tertiary admission centres to support ATAR-Plus or non-ATAR admission schemes and could change the existing patterns of tertiary admission centre and non-TAC admissions. This could reaffirm the system-wide model that has operated as a very efficient and low-cost-to-entry

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[75] La Trobe University response to discussion paper, p6
[76] SATAC response to the discussion paper, p5

means of managing the significant volumes of applications to providers every year, and delivers to applicants a preferred outcome from diverse provider offerings."[77]

An applicant portal?

As set out in Section Thirteen a development from the United States is an inversion of the role of the tertiary admission centre. Where a tertiary admission centre receives applications for specific courses, the US service operates for the applicants, taking their details, interests and hoped for outcome and allows the providers to offer a place on basis that they can match the applicant's needs.

It could be part of a wider tertiary admission centre future role or a distinct new organisation.

Where next?

5. The Department of Education and higher education providers could encourage the Australian members of the Australasian Conference of Tertiary Admission Centres to form a stronger nationally linked set of centres.

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[77] USQ response to discussion paper, p4

Section Thirteen: International exemplars

There are admission systems across the world that seek to assist the transition into higher education. These admission practices are tied to other local contextual factors that make simply borrowing a practice unlikely, but they can stimulate discussion and show that other approaches can be of value.

It was beyond the scope of the current process to undertake a thorough analysis of these arrangements. However, where developments of interest are known, mostly from the UK, it is useful to highlight them to consider their relevance to future arrangements in Australia. Some limited information is included in this section covering:

- UK discussions to replace its system of initial offers based on predicted grades with a post-results system;
- UK evidence about the degree of accuracy of school grades;
- moves in the UK to replace open ended personal statements, with responses targeting precise closed questions; and
- the US development of applicant portals, that seek to match providers to the applicants.

At-school or post-results offers

The UK has had a decade long discussion about its system of at-school offers. Its standard process is to assess applications based on predicted grades, with offers made prior to the release of school (or equivalent) results, usually conditional on achieving grades similar to those predicted. The argument was made that it would be better to await the actual grades.

In effect this discussion is the reverse of that now occurring in Australia.

The UK government supported a consultation on two options:

- for both applications and offers to be made following completion of school study and release of those results;
- for applications to be made in advance, with offers waiting on the results.

The government concluded that it "will not be reforming the admissions system to a system of PQA [Post Qualification Admissions] at this time. Instead, we will continue to work with UCAS and sector bodies to improve transparency, reduce the use of unconditional offers, and reform the personal statement to improve fairness for applicants of all backgrounds".

That outcome seems heavily pragmatic. The upheaval involved is considered too great for the potential gains, with the argument that other issues concerning higher education learning being more important for attention.

Accuracy of school results as basis for selective entry course admission decisions

The Higher Education Policy Institute, a leading UK Higher Education thinktank, has promoted a discussion based on analyses that the reliability of marking means that around 1 in 4 of the formal grades might be a level below or above.

The issue gained considerable traction since 2020 when COVID-driven changes to the exam and marking process, including use of teacher assessed grades in place of exams that could not be held, highlighted the challenges of national marking schemes.[78]

The use of applicant personal statements

The Universities and Colleges Admissions Service (UCAS) is an independent body that acts as the UK's shared admissions service for higher education. UCAS has revamped its approach to applicant personal statements replacing an open-ended statement with a set of six precise questions. It is to take place for applications for the 2024 admissions cycle.

See https://www.uniadmissions.co.uk/application-guides/personal-statements-removed-2024/ and the report that argued for this change at https://www.hepi.ac.uk/2022/11/24/%EF%BF%BCreforming-the-ucas-personal-statement-making-the-case-for-a-series-of-short-questions/

Australia's admission practice places little emphasis on applicant's writing a personal statement to show suitability for the course and provider. Emphasis is placed on numeric scores and rankings along with personal discussion with an applicant and consideration of a portfolio of information about past achievements.

The change in the UK reflects the potential problems with use of open-ended personal statements from applicants. For the applicant, there can be considerable uncertainty about what to write, which can mean the assessment is of the applicant's knowledge of what is likely to induce support, rather than any objective assessment.

There is evidence that applicants from better off backgrounds are more confident to write a statement and have more knowledge about how to present them. The change to ask for responses to six less open-ended questions removes some of the issues, but has been met with arguments that the questions overlap and highlight factors that some consider not relevant to selection.

The general tenor is about selection for competitive courses.

UNSW in its response to the discussion paper points to the further challenge of

> "the recent development of natural language AI technology which drastically alters the conversation about using personal statements for university admissions. Testing various free-to-access natural language AI platforms such as ChatGPT reveals their capacity to write responses to these questions which would undoubtedly attract high marks."

Applicant portals

https://concourse.global/

A development from the United States is an inversion of the role of the tertiary admission centre. Where a tertiary admission centre receives applications for specific courses, in preferred order,

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[78] https://www.hepi.ac.uk/2019/01/15/1-school-exam-grade-in-4-is-wrong-does-this-matter/ and https://www.hepi.ac.uk/2022/08/16/grade-expectations/.

where the applicant endeavours to show they are suitable for the course, the US service operates for the applicants, taking their details, interests and hoped for outcome and allows the providers to offer a place on basis that they can match the applicant's needs.

This approach explicitly targets providers and programs that look to accept most to all applicants who meet a threshold of suitability. It is not intended for selective programs, needing to exclude many applicants.

Section Fourteen: improving use of admissions data

In developing this submission on developments in admission practices, there were several points where questions about better use of the various data sets collected were raised.

- It is difficult to gauge the extent and significance of accepting courses in comparison with selective courses.
- The data about the admission of recent school leavers based on SSCE's turns on the use of the ATAR, with the assumption that almost all such students would have an ATAR. In consequence, the extent to which students come from the considerable portion of senior secondary students who do not have an ATAR eligible package of study is not clear.
- The focus for higher education on school leavers with ATAR operates in data collection terms largely independent of senior secondary reporting of student progression and outcomes. This leads to there being at least two different calculations in use to determine the size of the full cohort.

The Tertiary Education Quality and Standards Agency in its submission argued the:

> "need to better understand and evaluate emerging admissions practices, including at-school offers, to inform changes in government policy and regulation. To facilitate evidence-based decision making the Agency suggests harnessing existing data collected through the Tertiary Collection of Student Information (TCSI) framework, the Tertiary Admissions Centres (TACs) and institutional data"[79]

Provider analysis of data to inform admission practices

A constant request during the consultations from school, parent and other non-provider organisations was for information about the performance of students entering higher education focused at the different bases for admission. The particular focus was data about students who accept at-school offers.

Providers, by contrast, emphasised that as standard practice they analyse student performance through various admission pathways, adjusting and reducing use where student outcomes are less than expected.

National data on admission pathways

The Department of Education collects several sets of relevant data which could be used to highlight changes and continuity in admission practices.

The Department of Education publishes an annual report of undergraduate applications offers and acceptances at https://www.education.gov.au/higher-education-statistics/undergraduate-applications-offers-and-acceptances-publications based on data from each tertiary admission centre and Table A HESA providers. Its student data collection collects information about the basis for admission and ATARs but not other selection ranks more generally.

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[79] TEQSA response to discussion paper, p2

As a consequence of the previous action to improve admissions transparency, each higher education provider publishes summary tables about the admission pathways for the institution overall and for each course. This is a highly decentralised data set, whose purpose is information for potential applicants. If compiled and analysed it would, over several years, provide a detailed picture about the distribution of students by major pathways.

There could be opportunity to refine those data collections to alter the information collected about recent school leavers to distinguish the type of senior secondary certificate of education the applicant holds.

Where next?

6. The Department of Education could work with higher education providers and the tertiary admission centres to ensure data reported on student admissions reflects current and developing practice, suitable to support analysis and understanding.

Attachment A - Summary of consultation process

A discussion paper was developed, which was sent via email to key higher education and secondary education stakeholder groups. Stakeholders were invited to make a written submission in relation to discussion paper. 28 written submissions were received, from schools, parent bodies, universities, tertiary admissions centres, one state curriculum and assessment body, and TEQSA. Submissions were from:

1. Hale School (WA)	15. University of Sydney
2. St Stephen's School (WA)	16. University of Melbourne
3. Australian Parents Council	17. University of New South Wales
4. Isolated Children's Parents' Association Australia	18. University of South Australia
5. Australian Council of State School Organisations	19. University of Southern Queensland
6. Bond University	20. University of the Sunshine Coast
7. Curtin University	21. University of Wollongong
8. Edith Cowan University	22. South Australian Certificate of Education Board
9. La Trobe University	23. Australasian Conference of Tertiary Admissions Centres
10. Macquarie University	24. Queensland Tertiary Admissions Centre
11. Monash University	25. South Australian Tertiary Admissions Centre
12. Murdoch University	26. Victorian Tertiary Admissions Centre
13. Queensland University of Technology	27. Universities Admission Centre
14. RMIT University	28. Tertiary Education Quality and Standards Agency

Focus group sessions

There were 14 focus group sessions held to enable stakeholder groups to participate in a conversation about the discussion paper. Focus group sessions were held with:

1. Victorian-based university Deputy Vice-Chancellors-Academic – 23 March 2023
2. Tertiary Admission Centres – 27 March 2023
3. Group of 8 university representatives – 5 April 2023
4. Andrew Norton – 5 April 2023
5. National Union of Students – 11 April 2023
6. Independent Schools Australia – 12 April 2023
7. Equity experts in higher education – 12 April 2023
8. Parent groups (representatives from 4 parent bodies) – 13 April 2023
9. Universities Australia – 13 April 2023
10. Regional Universities Network (representatives from RUN and 7 regional universities) – 13 April 2023
11. Australasian Curriculum, Assessment and Certification Authorities (representatives from ACT, NSW, NT, Qld, Victoria and WA) – 14 April 2023
12. TAFE Directors Australia (representatives from TDA and 4 TAFEs) – 18 April 2023
13. Independent Higher Education Australia (representatives from IHEA and 16 independent higher education providers) – 20 April 2023
14. Catholic Secondary Principal's Association (representatives from CaSPA and NSW, VIC, SA and WA) – 1 May 2023