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Professor Kerri-Lee Krause
Chair, Higher Education Standards Panel Advisory Committee on Admissions Transparency
Deputy Chair, Higher Education Standards Panel
c/- Higher Education Standards Panel Secretariat
Via email: HigherEd@education.gov.au

Dear Professor Krause,

Thank you for the opportunity to provide feedback to inform the HESP submission on admission practices to the Australian Universities Accord review.

The University of Sydney particularly welcomes the focus on **admissions transparency**, which is especially timely in light of the concerns about 'At-school' offers raised last year by Professor Peter Shergold AC, as Chair of the NSW Educational Standards Authority (NESA) Board.

We make very few At-school offers; with these based on a clear rationale, such as entry based on audition at the Conservatorium of Music or portfolio in the College of the Arts. Further, in our responses to the paper's consultation questions (attached), we describe why we relocated our application process for Aboriginal and Torres Strait Islander students to our state TAC, enabling a more streamlined, less complex process in identifying eligible applicants for university study.

We also require completion of mathematics to a certain level for many courses. For the ATAR to have maximum value as a university admissions tool, this depends on all prospective students completing their year 12 courses to the best of their ability. We have received feedback from schools that with At-school offers in play, students lose interest and do not give a full effort to completing their year 12 studies. Consequently, we fully support universities only making offers that are contingent upon the completion of the HSC, to ensure that students are best-prepared to undertake undergraduate-level study.

The recent change in NSW to prevent At-school offers from being made until September is a positive move, however, it does not remove all of the existing concerns about the practice. It does not address the lack of transparency regarding the criteria on which At-school offers are being based.

Our position is that admissions best practices should be premised on providing as much benefit as possible to applicants, to allow them to make informed decisions on the basis of transparent entry requirements and data. Further, that the transparency of any At-school offers should be equivalent to ATAR entry offers, with universities required to publicly disclose the criteria by which students are allowed entry.

Without these assurances, 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.

We hope that you find our responses to the paper's consultation questions helpful. Please do not hesitate to contact my office should you require further information.

Yours sincerely,

(signature removed)

Professor Joanne Wright
Deputy Vice Chancellor (Education)

Attachment University of Sydney feedback to the HESP Discussion Paper, 'Developments in Higher

Education Admission Practices', March 2023



University of Sydney feedback to the Higher Education Standards Panel Discussion Paper, 'Developments in Higher Education Admission Practices', March 2023

Drivers

1. What outcomes, characteristic of an effective system for the transition into higher education, can be used to assess the impact of changing admission practices?

Outcomes and characteristics of an effective system for the transition into higher education include:

- Every applicant receives offers to the higher (most desired) university courses for which they
 meet the academic admission requirements, regardless of their method of admission.
 Measures for this outcome should be found by comparing the Semester 2 and/or Year-One
 retention rates of students admitted through different methods, as well as the rates at which
 they change courses.
- The academic performance of students admitted to the same course through different methods is equivalent, once controlled for relevant variables. The extent to which this outcome is achieved may be evaluated by comparing the academic performance during the university studies of students admitted to the same programs through different methods.
- Any admissions strategies pursued with the claimed intentions of boosting equity of higher
 education access and success can demonstrate that these outcomes are being delivered. In
 relation to At-school offers, for example, the achievement of these goals can be measured
 through analysis of: the distribution of such offers to students from schools serving
 communities of different socioeconomic status; data on the acceptances of these offers by
 students from different schools and backgrounds; and as noted above, data on the retention,
 course change and academic performance of these students once enrolled at university.
- Students navigate an admissions process that is as simple as possible, through a central system, which ensures that each student is made an offer to their most "preferred" course they are eligible for in the first round (first opportunity). Such a system would have characteristics including:
 - Tertiary Admission Centres (TACs) operate transparently and in the best interests of applicants.
 - Prospective students understand the eligibility requirements so that they can somewhat self-assess when making their application decisions.
 - Students apply for courses in order of their genuine preferences; they do not feel
 pressured to preference one course/institution over another because of the marketing
 initiative of an individual institution.
 - Students do not need to apply to several institutions separately and provide information multiple times to different institutions.
 - Key influencers, such as careers advisers, teachers and parents have sufficient, timely and accurate information to help students navigate the application process.
 - Once enrolled, each student is able to move through their educational journey successfully to a level of their choosing (i.e. could transfer to a preferred course, could successfully complete a year and leave, or could complete the degree and further higher degree by research).

2. What are the external factors and provider intentions driving changes in domestic undergraduate admission practices?

Key external factors and provider intentions driving recent changes in undergraduate admissions practices may include:

Key external factors

- Student perceptions of different institutions including their reputations, rankings, quality and perceived employability upon graduation.
- The growing recognition in Australia that individuals will increasingly require post-secondary qualifications to maximise their prospects of success in labour markets that are increasingly demanding higher-level skills and qualifications for well-paid and secure jobs and careers.
- Actual or reported softening of demand from domestic and/or international students for the
 educational offerings of some Australian higher education providers arising from a
 combination of factors including: students' educational experiences during school during the
 pandemic; Australia's historically low levels of unemployment; rising cost of living pressures;
 and for some domestic school leavers, perceptions about the value of pursuing higher
 education studies rather than entering the workforce directly.
- Grade inflation during the pandemic in certain cohorts of students, in particular the International Baccalaureate and A-Levels. Grade inflation in some qualifications and not in others such as the HSC puts those in the latter qualification at a disadvantage.
- The financial incentives that the Job-ready Graduates Package's changes to higher education funding have exacerbated since 2021, rewarding institutions that enrol domestic Commonwealth-supported students in disciplines with higher student contributions and lower Commonwealth contribution amounts.
- Other complex issues linked to the way that Australian universities are being funded through the JRG Transition Period (2021-2023) and in the following years, which together place additional pressure on some institutions to maximise their domestic student enrolments.

Provider intentions

- The desire to maximise opportunities for domestic school leavers and other prospective students to access higher education for the employment and other lifetime benefits this can provide.
- The claimed goal to reduce the levels of stress and anxiety experienced by students in Year 12, particularly for those students whose secondary education were significantly disrupted by the pandemic.
- The imperative for institutions to maximise funding to meet or exceed their budget forecasts, so that they can continue operating and not have to balance budgets by reducing staff or finding savings through other means.
- The belief, in some universities and schools, that the ATAR, as a single expression of school outcomes, undermines learning outcomes for students, is highly correlated with the socioeconomic circumstances of students, does not always accurately reflect an individual's potential to succeed at university-level studies, and does not accommodate students who do not complete sufficient Year 12 subjects to qualify for an ATAR. Non-ATAR based admissions practices are therefore pursued on equity grounds.
- For some institutions, including the University of Sydney, a commitment signal to schools, students and their families the importance of undertaking certain foundational subjects at school, by imposing pre-requisites in mathematics and other subjects necessary for success in certain fields. For example, declining numbers or shares of school students completing higher level mathematics courses in NSW, particularly female students, have been concerning to governments and some universities for many years.

Domestic undergraduate admission practices

3. What are the impact and implications of At-school offers? Are there ways to mitigate concerns?

'At-school' offers are designed to lock students into an institutional choice earlier and provide those institutions with a competitive advantage.

The consistent feedback from schools in NSW has been that At-school offers cause students to lose motivation towards the end of their studies. It ultimately limits the study choices students will have available to them. There are also potential implications for the integrity of the ATAR if At-school offers continue to grow, due to the way the ATAR is calculated and influenced by both individual student and cohort performance. If there is any factor e.g. complacency or lack of focus, that would cause capable students to score lower than they normally would, then the total number of marks for the group will diminish and this could significantly affect the individuals in the group.

A key argument that some institutions make for At-school offers is that they 'reduce stress' on students by providing them with greater certainty earlier in their studies. This argument can only hold, however, if some institutions are making such offers while others are not. Ultimately, institutions are making admissions decisions on some criteria, be it the ATAR, or Trial HSC results, or Year 11 results. Should all institutions change to start making admissions on the basis of (for instance) Year 11 results, then the pressure on those students becomes identical, but earlier in their life when they are completing Year 11, not Year 12. It is difficult to imagine that pressure is better handled by a Year 11 student than a Year 12 student.

The change in NSW to prevent At-school offers from being made until September is a positive move, but in no way removes all of the existing concerns about the practice. It does not address the lack of transparency regarding the criteria on which At-school offers are being based.

To be able to apply for At-school offers, students should be clearly informed of each institution's schemes and application processes. Those disadvantaged by unclear or multiple information points are almost always equity cohorts enrolled in schools that usually have fewer school staff and other resources to support or guide them through the process. This could be improved by running all At-school schemes through a central system with some uniform structure (dates, documents) around it. Ideally through the TAC, which could then run information and educational sessions to cover the process in a university agnostic way.

4. In what systemic ways are higher education providers improving the admission experience for applicants:

- who are secondary school students?
- with previous higher education experience?
- with VET qualifications?
- relying on post-school, work and life experiences?

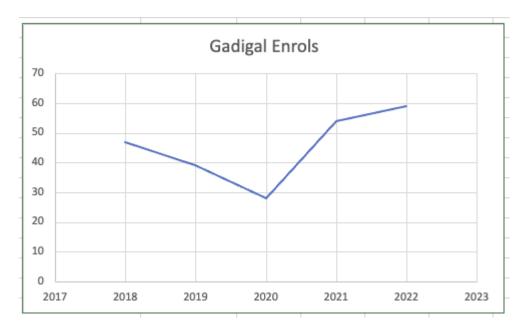
Secondary school students

Recent changes including transparency data and advisory terminology (such as the provision of 'lowest selection rank' for previous year entry) have greatly assisted applicants with this experience. Additionally, applicants also have provision to re-order or select new course choices after the release of the ATAR so they are making informed choices and able to limit wasted preferences.

The University of Sydney also utilises a 'Guaranteed' entry selection rank requirement for most courses which also assists – especially for applicants who are in a clear position and are not eligible for, or dependent upon, adjustment factors for entry. Additional clarity has also been supplied around the potential for adjustment factors with greater disclosure on the TAC website and the University website.

Aboriginal and Torres Strait Islander applicants to the University of Sydney are assisted via an improved process, which resides with the state TAC. This was previously an application process that resided with the University (located on our website). This change has enabled a more

streamlined process in identifying eligible Indigenous applicants and automatically providing the additional application materials. It has also removed institution-specific complexity and the need for an additional application for students. See in the below graph, our Gadigal program enrolment data from 2018 - 2022, noting the increase since the removal of the direct application process and move to the TAC environment in 2021.



Previous higher education experience

This is a more difficult group to connect with and manage given the variation in academic histories. These applicants may encounter a variety of entry rules that can impact their final selection rank. The University of Sydney utilises a 'best foot forward approach', where those with existing tertiary studies can compete for a place on the higher of their historical ATAR or University performance (via GPA). This assists by providing some clarity when looking at academic entry requirements. Additionally, from 2023 onwards the University of Sydney has included support for low SES applicants in this cohort through reduced entry requirements and financial support while studying (for the duration of their undergraduate degrees). No additional application or assessment is required for this; students are automatically assessed via their TAC application address.

VET qualifications

Entry to the University of Sydney via VET qualifications is not a feature of our commencing cohort. The minimum entry level qualification is AQF level 5 (Diploma) with few course options available. For these pathway applicants (and the cohort below), consistent and careful monitoring of the performance of these groups would be required so that modification of any entry requirements would be evidence-based.

Post-school, work and life experiences

This area is not currently an entry pathway option for undergraduate courses (as per our *Coursework Policy 2021*). For this cohort of applicants, most would likely study at another university and then seek to transfer with a one-year full-time degree level study (and a commensurate GPA).

5. Are there elements of developing admission practices that risk further disadvantage to applicants from underrepresented groups?

The proliferation of At-school offers and schemes leading to adjustment factors has created an environment where it is very difficult for those new to the process to navigate. An applicant will potentially have varying entitlements across different institutions for the same experience of disadvantage. This requires scanning of individual institution websites to garner information and establish offer success, often by students who have less ready access to family and other support people who have been to university.

The reduction in transparency in the criteria that institutions are applying for At-school offers combined with the likelihood that students from advantaged backgrounds and better resourced schools are more likely to be able to make strong cases against some criteria (extra-curricular activities) and navigate the application process, has the potential to further entrench disadvantage. As we suggested in our response to Question 1, the equity consequences of the growth in At-school schemes would benefit from undertaking robust independent research to assess the extent to which recent changes in admission practices are achieving the goals and outcomes claimed by their proponents.

6. What other undergraduate admission practices in countries around the world could be of value in Australia?

There has been a noted shift, especially in the United States, of entry without Year 12 type exam requirements. This places a greater emphasis on potential and personal statements/interviews which may not work in Australia. Despite our population size, public universities have very large student numbers (often significantly larger than many of our global peers) and our need to issue high volumes of offers annually may negate our ability to pivot to an individualised process.

Australia does not have a history of interview style entry and any shift would need to carry the notion of fairness and accessibility for all Australians. Moreover, there have been high-profile legal cases in the United States in recent years, which have successfully prosecuted instances of admissions fraud and corruption that were arguably made more possible by the relative lack of transparency in the admissions practices of the institutions involved. Australia's current ATAR-based system is not without fault, however, whatever replaces it would potentially struggle to meet Australian values and perceptions around how admissions processes should work to provide access to higher education transparently on the basis of merit.

The technology in use (in regard to generating ATAR and ATAR equivalent ranks in the TAC system) is sufficient for our academic requirement-based entry ethos. We agree that in the event of a shift to entry based more on other attributes, parameter-based machine outcomes would play a part – given the need to turn around thousands of offers in a short time frame. Institutions are also largely dependent on other data providers such as state government bodies for Year 12 results. Despite this, we are able to turn around offers within five days of school results being released and this seems to meet market expectations.

Admissions infrastructure

7. What are the major areas for improvement in the national HE information websites?

National information websites now provide a great resource for applicants (such as Course Seeker for domestic applicants), however, the promotion of these websites - ahead of existing TAC and university websites - remains a considerable issue. Government websites would perhaps be better served through a standardised information page (with links) available on all providers' and TAC websites. Applicants do not, at this time, appear fully aware of JRG related course study costs and HECS liability implications. Often, the required information is housed in a variety of government areas, making it difficult for students to locate.

To be able to properly assess these, it would be helpful to understand how much use they get. Anecdotally, these sites do not come up in conversations with school students as used resources. Are they being used? If so, by what proportion of the applicant cohort?

8. How can Tertiary Admission Centres best support developments in admission practices?

TACs can best support developments in admission practices by focusing on what should be their core business of processing applications in a timely and efficient manner. In NSW, UAC has been increasingly focused on developing portals for individual institutions to facilitate At-school offers and through the provision of multiple offers to universities. The current pay-per-offer model has a bias towards students receiving multiple offers from a variety of central or decentralised portals. This works in favour of the TACs by providing a larger revenue base and for some universities by providing (arguably) a competitive advantage. It is, however, far more complicated and confusing for students.

Furthermore, having several direct portals with applicants and offers means the central environment has lost its ability to track student trends and provide government and broader market data. The move towards portals and non-ATAR offers has substantially undone the previous admissions transparency work conducted by the Commonwealth with the guidance of the HESP, as the basis for admissions for these offers is not in any way transparent.

The role of TACs in the At-school offer process could also be more transparent as we are starting to see greater emphasis placed upon 'predicted' ATARs with calculations from an even blacker box than the ATAR itself. If At-school schemes are to become a permanent feature of the transition to the tertiary education landscape, then more information is required to assist schools, students and parents on what is required in pre-Year 12 studies to obtain a predicted ATAR.

While there is no financial disadvantage to individual applicants in this process as the fees per offer are carried by institutions, we note that the lack of transparency around the criteria used to make Atschool offers would potentially favour any schools who could be consistently inflating Year 11 results to obtain the best outcome for their students from the process. We understand that TACs look at outcomes and moderate them against eventual Year 12 results, however, it would not negate such advantage entirely. Additionally, these schools have greater potential to ensure that students receive all adjustment factors they are entitled to – through greater resourcing. TACs need to provide greater assistance to those applicants (or remove some barriers) whose schools are not willing or resourced to provide the advice or impact statements required to support adjustment point claims.