9 AUGUST 2024

SUBMISSION IN RESPONSE TO POST-BUDGET IMPLEMENTATION CONSULTATION PAPERS

AUSTRALASIAN CONFERENCE OF TERTIARY ADMISSIONS CENTRES (ACTAC)

ACTAC: Coordinating consistent admissions nationwide

The Australasian Conference of Tertiary Admissions Centres (ACTAC) comprises the five state and territory admissions centres in Australia, as well as the University of Tasmania. The New Zealand Qualifications Authority is also a participant in ACTAC processes.

ACTAC facilitates coordination and sharing of practice between tertiary admissions centres to benefit learners and providers and assist interstate student mobility. ACTAC welcomes the opportunity to provide feedback in response to the **Managed Growth Funding System** and **Needs-based Funding** consultation papers.

ACTAC is pleased to engage with these significant proposals and keen to work with the Department of Education, sector stakeholders, and the Australian Tertiary Education Commission (ATEC) once established to ensure the success of future implementation.

Meeting local needs through state tertiary admissions centres

While admissions centres operate in some international environments, Australia is unique in having a consistent national admissions system operated by state-based admissions centres, balancing consistency with diversity and responsiveness to local conditions and requirements. This model allows individual state admissions centres to work closely with their local stakeholders and respective state/territory curriculum authorities to best meet the specific local needs of learners and providers, and facilitates national consistency where it's useful, such as ensuring the Australian Tertiary Admission Rank (ATAR) is consistent between states. The ATAR and IB Admissions Score (IBAS), both calculated by ACTAC members, provide a portable academic credential to enable interstate mobility. ACTAC also supports government with initiatives such as the Higher Education Standards Panel's Admissions Transparency projects and the implementation of the Unique Student Identifier (USI).

This model, including collaboration facilitated through ACTAC, provides the infrastructure to support students accessing courses nationwide while allowing each state and territory to meet the different approaches and priorities of each state's curriculum body. This model also provides personalised support to students, schools, and tertiary providers. The TACs represent a long-standing effective and efficient shared service model for the tertiary education sector, providing significant benefit for students and providers in each state and territory.

ACTAC is in a unique position to provide expert advice on a range of admissions matters to the Department and in future to the ATEC, and can act as a trusted partner in the implementation of policy arising from the Australian Universities Accord. ACTAC members can leverage systems and data in supporting Government's implementation priorities, and welcome the opportunity to partner with Government on the capability uplift required to deliver responsive tertiary policy outcomes and timely support for equity cohorts.

Build on existing measures to support growth of equity cohorts

Tertiary admissions centres currently provide a range of services and resources to support access to tertiary study by equity cohorts. These include dedicated access and equity schemes such as the Educational Access Schemes in NSW, Queensland, Victoria, and Western Australia which provide a one-stop application for special consideration covering all preferences for an applicant, as well as centralised access to equity scholarships, which in some states are bundled with scholarships.

ACTAC

Tertiary admissions centres are also engaging in research work and pilot projects to explore broader recognition of general capabilities and other ways of demonstrating potential for success in tertiary study. These measures, used in addition to or instead of the ATAR, can support increased access to tertiary courses in line with the equity targets set in the Accord.

Future measures should be designed to build on the success of these programs, leveraging the existing structures TACs have created to provide information and support to students and schools. The state-based TAC network is well-placed to support implementation that provides national consistency where it makes sense and meets local needs.

> **Recommendations:**
> - Engage with tertiary admissions centres to understand the range of equity programs currently on offer and develop and promote best practice
> - The ATEC should work closely with tertiary admissions centres in designing future equity initiatives

Equity students need clear information about their eligibility status and course options

The Managed Growth Funding paper states that "managed demand-driven funding will apply for students from a low-SES, regional or remote background, or students with disability". The criteria for consideration in each of these equity categories should be set in consultation with TACs and tertiary institutions to enable a consistent national definition.

For this policy to have positive impact, students from equity backgrounds need to understand their eligibility status and the study options enabled by managed demand-driven funding well in advance of receiving an offer. This information can then inform their course research and submission of course preferences. Tertiary admissions centres are well-placed to evaluate the equity status of applicants and provide additional support to those from an equity background. Further, there may be an opportunity for TACs to build on existing close relationships with state curriculum authorities to provide data on prospective students from equity cohorts earlier in the admissions cycle to aid sector planning.

Priority in policy setting should be given to supporting choice of tertiary provider by equity students, who may make their decisions based on factors including access to support networks, flexibility of location and study mode, student support services, course structure and specialisations.

If a model of student catchment areas is adopted, tertiary admissions centres can inform effective, efficient, and student-focused implementation through data on prospective students' intentions (via course preference data) and outcomes (via enrolment data). Policy settings should support students' choices to access high quality tertiary education close to home, or relocate to suit their circumstances and study goals.

> **Recommendations:**
> - Adopt simple, student-focused national definitions of relevant equity cohorts
> - Leverage the expertise of tertiary admissions centres and institutions in supporting the diverse needs of different equity cohorts
> - Recognise the importance of student agency and choice in tertiary provider
> - Support tertiary admissions centres to provide national analysis of equity cohorts and key factors relevant to applicant intention, behaviour and outcomes

Consider a range of factors in structuring student support

While TAC research confirms that the ATAR is a strong predictor of success in tertiary study, this analysis is conducted in the context of existing supports which are available to equity students at the secondary and tertiary level. Limiting funding for equity students with high ATARs through a tiered approach proposed in the Needs-based Funding paper, while funnelling the most funding to those students potentially most in need, may result in inadequate funding being available for some students in the higher-achieving cohort that still need support. Research by UAC confirms that existing equity scholarships and supports have a positive impact on the performance of students from equity backgrounds at the tertiary level. For students with the same ATAR and in the same IEO (Index of Education and Occupation) quartile, those in receipt of equity scholarships (many of which include

additional support systems) had slightly lower fail rates and slightly higher average GPAs than those without.[1]

Where an ATAR is not available, tertiary admissions centres have a range of schedules which are used to provide a rank for course selection on the same scale as the ATAR. These ranks can be awarded for study in alternative or overseas curricula, completion of VET or higher education study, employment experience or other factors. Tertiary admissions centres are also engaging with emerging assessment of student strengths and general capabilities which can provide proxy information about preparedness for academic study.

Measures to tie student support funding specifically to certain students and cohorts risk adding barriers to access. Tertiary admissions centres expend considerable effort in engaging with students to overcome barriers to disclosure of personal circumstances for the purposes of special consideration and scholarships. Requiring students to disclose specific personal details to access support services once in tertiary study may be a deterrent for some students wishing to access these services.

> **Recommendations:**
> - Recognising the value of existing student support services in supporting some equity students to succeed, needs-based funding should be additional to existing funding (i.e. support funding should not be reduced from current levels for any equity students, regardless of academic performance)
> - Leverage existing expertise in assessing prospective students' preparedness for tertiary study by engaging with tertiary admissions centres
> - Ensure support schemes and associated funding are designed to reduce barriers to access by students

Supplementary offer systems to fill course vacancies currently operate in all jurisdictions

The Managed Growth Funding paper proposes a model whereby students from equity backgrounds who do not receive a place in their preferred courses can be offered a "similar place at another university with … unused places". All TACs already provide mechanisms for applicants who do not receive an offer for any of their course preferences to be made offers for other courses where places are available. One example is the "supplementary offers" process in Victoria and similar arrangements in other states. There is an opportunity here for the Department and the sector to work with the TACs to provide greater national consistency between these schemes and improve visibility to students.

Under the current funding model, the vast majority of applicants (over 85%) already receive an offer for a course on their list of preferences. QTAC data shows that this is consistent for many equity groups, with offer rates for low-SES applicants (86.07%), rural applicants (87.89%), and first-in-family applicants (85.60%) exceeding the overall average of 85.49%. UAC data paints a similar picture: in the most recent admissions cycle over 85% of low SES students and over 90% of rural and regional students received an offer.

Student agency is a key driver of successful participation in tertiary study, and it is important that all students, especially those from equity backgrounds, are supported to access the courses and universities which are geographically and culturally relevant to them. TAC survey data shows that specific institution locations and proximity are a key consideration for 61% of students surveyed in Victoria[2] and 54% in NSW and ACT[3] (the second-highest student consideration in both jurisdictions), highlighting challenges that may emerge if attempting to funnel students away from the institutions to which they have applied. While TACs are well-placed to facilitate the offering of course vacancies to unsuccessful applicants within each state and nationally, we caution against a model which does not empower students to study in a location and community which will best support their success.

An unintended consequence of funnelling students from equity backgrounds into courses and institutions to which they did not apply may be an increase in course transfers and decrease in

---

[1] Universities Admissions Centre, "Student Disadvantage and Success at University", (2021) https://www.uac.edu.au/assets/documents/submissions/student-disadvantage-and-success-at-university.pdf
[2] Victorian Tertiary Admissions Centre, "Gen Z On Course: Perspectives, behaviours and aspirations of 2022 Year 12s", (2022) https://vtac.edu.au/files/pdf/publications/VTAC_Report_-_Gen_Z_on_course.pdf
[3] Universities Admissions Centre, "Student Lifestyle Report", (2023) https://www.uac.edu.au/assets/documents/submissions/uac-student-lifestyle-report-2023.pdf

![ACTAC logo]

retention if students view their "similar place at another university" as a means to obtain a future place in their desired institution.

> **Recommendations:**
> - Centre student agency in the design of all schemes, especially those aimed at supporting equity students
> - Leverage and raise national visibility of existing TAC schemes and expertise in aiming to fill unallocated places under the Managed Growth Targets

Provider flexibility is key in maximising student access and success

While Government's long-term aspiration to grow the number of Commonwealth-supported Places in the system is positive, the establishment of the hard caps proposed in the Managed Growth Funding paper may result in risk-averse providers under-offering in the current difficult financial climate. Many providers are managing a combination of direct and TAC applications, as well as a variety of offer rounds, sometimes in multiple states, which can make adherence to strict targets challenging. Universities may need to rescind offers if caps are exceeded, which can leave prospective students without a place or having to obtain a less-preferred course in a short time, with, potentially, considerable anxiety.

Caps and limits should be flexible and capable of responding to emerging conditions. The mechanisms for setting any such caps should be transparent. Any policy settings likely to have significant impact on the availability of places should be foreshadowed within sufficient lead time. This approach will allow prospective students and their support networks to plan and understand their likely chance of obtaining a place in their preferred course.

> **Recommendations:**
> - Avoid hard limits which may inhibit student agency and the making of course offers by tertiary providers
> - Set targets which encourage tertiary institutions to maximise the use of available funded places
> - Incorporate sufficient lead time in any proposed changes to ensure timely and effective communications with prospective students

Consider the operating rhythms of the sector when implementing new funding arrangements

Tertiary institutions and admissions centres provide information to prospective students about the application process and tertiary study from year 10 onward. The advance notice provides students with time to explore and understand their study options and allows them to plan their senior secondary study program around their tertiary ambitions.

Changes to funding arrangements which impose hard caps on CSPs are likely to have a significant impact on students' approaches to their applications and preferences and may cause anxiety for students and parents. While the transitional arrangements proposed in the Managed Growth Funding paper may act as a 'safety net' for universities from a funding perspective, it is unlikely to provide certainty for prospective students as to place availability and entry requirements.

In acting as an admissions coordination body, ACTAC is also well-placed to support the rollout of future special funding schemes, such as the Nuclear-Powered Submarine Student Pathways initiative.

> **Recommendations:**
> - Provide greater lead time for changes to funding arrangements which may impact availability of places and course entry thresholds

ACTAC and the tertiary sector: an opportunity to drive positive change

ACTAC members look forward to engaging with the Department and the sector to deliver positive outcomes for students, government and the sector, including in the provision of a national consistent framework to achieve key policy objectives. ACTAC welcomes the opportunity to work with the Department and the ATEC in implementation. Please contact Teresa Tjia, ACTAC Convenor via ▮▮▮▮▮▮▮▮ for further information and next steps.