

# Next steps on improving transparency of higher education admissions

Navitas submission  
2 November 2022

# Navitas' response to the consultation paper: Next steps on improving the transparency of higher education admissions

Navitas welcomes the opportunity to respond to the consultation paper *Next steps on improving the transparency of higher education admissions*. Navitas is supportive of efforts to increase the transparency of the admissions process in Australian higher education and welcomed the guidance that has been provided by the Higher Education Standards Panel (HESP) on this to providers in the past.

The following submission outlines information on Navitas and its operations, outlines high level feedback on the approach proposed in the consultation paper, and then directly responding to each of the questions asked in the consultation paper.

## About Navitas

Navitas Pty Ltd is made up of multiple different colleges and higher education providers. Navitas operates over ten higher education providers that deliver courses to both domestic and international students across Australia. This includes our university partnerships divisions where we provide pathway courses to students in preparation for their studies with our university partners at the Diploma level – including for both international and domestic students. Navitas also has two standalone higher education businesses – SAE Institute and Australian College of Applied Professions (ACAP) – which primarily cater to domestic Australian students.

Navitas is strongly supportive of efforts to increase the information available to both students, and the broader sector, on information related to admissions processes for Australian higher education providers. Given this, Navitas is supportive of the broader proposals outlined, but note that there may be some nuances that need to be considered in the implementation of these objectives. Specifically:

- **Navitas is supportive of the extension of existing admissions transparency principles to postgraduate courses**, viewing this as a sensible and appropriate extension of existing practices
- **Navitas is supportive in the intent to provide more information to international students**, but notes some nuances will need to be considered in the implementation of this
- **Navitas understands the intent of providing more detail on ATAR for all students (not just those that were offered on the basis of ATAR), but suggests further guidance is given to providers on how this should be communicated to students**, to ensure applicants are provided the information is clear and transparent to students on course eligibility and selection criteria.

Navitas does not believe these changes will substantially impact the experience of a student in choosing which course they will study, but do believe consistency in information is valuable. Navitas would also identify that as well as sharing information directly with students, it is important the sector better understands the impact of admissions decision-making on students success (including course outcomes, attrition and completion). Some proposals are put forward to support this.

## Inclusion of postgraduate courses

1. **Do you agree with the proposed two applicant grouping to target admission information to prospective students?**

**Navitas supports the two proposed applicant groupings for postgraduate courses.**

The two applicants groups proposed (completed higher education study and work, study and/or life experience) are sensible and appropriate for postgraduate admissions. To ensure consistent application of these applicant groupings, clarification could be provided to providers for how admissions that consider both completed higher education and work experience are to be communicated (for example, for professional programs).

2. **What are your views on the proposed inclusion of information about the availability and allocation of Commonwealth Supported Places (CSP) in postgraduate courses, which some students have indicated may assist in choosing the best course for their needs?**

**Navitas is supportive of the proposed information on CSP places being transparently communicated to prospective students, however, notes that most independent providers, including Navitas, do not receive CSP funding.**

For providers that do receive CSP places, Navitas believes that CSP places allocated to each course should be disclosed and providers should be transparent on the basis for CSP allocation. For example, clarifying whether CSP is allocated on academic merit, equity consideration, or based on application timing.

For providers that do not receive CSP, Navitas believes that there should be no requirement to include a section on CSP in the information that is provided to students.

## **Inclusion of information for international students**

3. **Do you agree with the proposed approach of integrating the minimum required admission information to enable course comparisons for international students without creating a separate applicant grouping?**

**Navitas supports the inclusion of information for international students to be shared in a consistent and transparent way.** However, also notes that there is additional complexity in international student admissions that needs to be factored into any approach adopted.

Firstly, there is some complexity with international students and the assessment or testing regime that is being assessed through admissions. For example, while both international and domestic students may be admitted on the basis of their secondary school results, for most international students this will not be on the basis of an ATAR. Instead, students may be admitted on their local curriculum, increasingly this includes Gao Kao or Gao San for students that undertook their schooling in China, or international curriculum, such as the International Baccalaureate (IB). This will create challenges in adopting a “mainstreamed” approach to international education admissions, and could result in international students not accessing the information they require.

Secondly, admissions requirements may differ between international and domestic students. While Navitas does not have different admissions levels for international and domestic students for any of its courses, it is Navitas’ understanding that some providers do have different admissions levels and requirements between international and domestic cohorts.<sup>1</sup>

An alternative approach may be for consistent information to be made available to international students which is linked from the main information set. This would enable a consistent source (and form) of information for international students, which provides information relevant to that student cohort, including admissions requirements and other guidance. This still acknowledges the different complexities for international student admissions.

4. **Is it appropriate and workable to separate out different cohorts of international students in the student profile tables on the same applicant grouping basis as domestic students (higher education, VET, recent secondary, work and life experience) rather than a single figure for international students as in the current information sets?**

***Note: if you are a provider, does your institution have data that would enable this approach.***

**Broadly, Navitas supports the inclusion of these four different cohorts for international students in the student profile tables.** Navitas does however note that the specific information will differ between students

---

<sup>1</sup> It should be noted different admissions levels are required for some professional accrediting bodies, in particular in relation to English language standards.

from different source countries, given differences in school curriculum and other facets of their education and training systems.

Broad statements may be required for international students which are applicable across different source countries. Providers may then choose to provide more detailed guidance with further information on the admissions requirements related to the students' own country.

Vocational education is also a less common pathway for international students that have not studied Australian qualifications. While we support its inclusion, changing to the wording and description may be required to ensure it is appropriate for an international student audience.

Navitas does note that for its own international student cohorts, almost all students would be included in the Recent Secondary category for undergraduate courses. This is likely to be similar for a large number of other providers. While the consistency with domestic students will be useful, it is not likely this will provide an important source of information for students in making their decision on which course to undertake or provider to study with.

**5. What are your views on the proposed:**

- a) **Inclusion of offshore students in enrolments profiles where they are studying with onshore students**
- b) **Exclusion of purely offshore course offerings, for instance, courses offered at an overseas campus, as out of scope for this exercise?**

**Navitas supports the inclusion of offshore student enrolment profiles where they are studying with onshore students.** In Navitas' case, these students will typically hold a student visa, have been provided with a confirmation of enrolment, and will be considered as part of the onshore student cohort. It therefore does not make sense to exclude them based solely on their physical location.

Navitas agrees that purely offshore students should not be included in the information sets.

## Enhancing the reporting of ATAR

**6. Do you see any difficulty with including the ATARs of all recent secondary students offered a place in the ATAR profile table for a course?**

**Navitas understands the intent behind the proposal to include ATARs in the ATAR profile table for all secondary students offered a place in a course, however, believes this may create challenges.**

Firstly, not all providers collect information on ATAR where this is not the basis for admission, including for secondary school leavers. Many students at Navitas colleges are assessed on their portfolio work, or broader student experiences. This is particularly the case for creative industries courses, which as delivered by SAE Institute. Similarly, for our Diploma pathway programs the intent is to support students that may not otherwise be able to study in higher education. The requirement for admission is therefore typically a pass mark (not a specific ATAR score) and ATAR does not form the basis for admission for most students. It is our understanding that courses where ATAR is not the basis for admission for any students would be exempt from reporting ATAR in the information profiles.

Even for courses where ATAR is the basis for admission for some students, for those students that it is not, it is likely ATAR scores are not collected. There are therefore a range of instances across the sector where ATAR scores are not currently collected for each student. This would need to be considered in any proposed change.

Secondly, across the sector where lower ATAR scores are admitted, this is typically due to other factors being considered in the assessment process (for example, equity factors, personal circumstances, portfolio work or other relevant experience). In publishing only the ATAR score for all students "regardless of whether ATAR will be a factor" there is a risk this may create confusion for students that have obtained this score, but may not be eligible or likely to be successful in their application on the basis of these other attributes or experiences. It is therefore important that transparent admissions information is not only clear on the lowest ATAR, but more importantly on the other factors that may warrant an offer to the student.

Thirdly, there is a risk sharing this information on ATAR prioritises the importance of ATAR, when in fact broader admissions factors are considered important to the likely success of the applicant in the courses they have applied for. Publishing ATAR risks prioritising it to students when in fact, alternate factors may be more In for a specific course.

## Overall feedback on admissions transparency initiatives

### 7. Are there any other aspects of either the previously agreed common terminology definitions or information set specifications or the implementation admissions transparency that you wish to comment on?

Navitas has two further comments it would like to make – in relation to timelines and building a stronger evidence base to support admissions decisions.

The first, relates to the proposed implementation timeline for these changes. The proposed implementation is scheduled to occur by the fourth quarter of 2023. Navitas notes that these timeframes are very tight and would only be possible if all stages of the current consultation and approval process are strictly adhered to. As outlined above, proposed changes to ATAR reporting would require changes in admissions processes. Sufficient time is therefore necessary to firstly communicate this change to providers, and secondly for internal changes to be made to ensure information required is being captured. As recruitment occurs in the months preceding term commencement dates, this timing would need to be considered in transition planning.

Secondly, Navitas strongly supports more information being available to the sector on what is effective and not effective for supporting different student cohorts. While most information in the discussion paper relates to what information is provided to students, it is as important to consider what information is captured to inform admissions practices. This is critical to build an evidence basis both within providers and across the sector to understand changes required to admissions settings. While Navitas does not support ATAR profiles being published for all students, Navitas does believe that it is important that this information is collected for all students in the Tertiary Collection of Student Information (TCSI), irrespective of whether this was the basis for admission for the course. Collecting this information would allow more rigorous understanding of the factors that support students outcomes, including developing an evidence base on which courses, such as pathway programs, support students from low ATAR backgrounds succeed in higher education. Extension of this for international students would also be valuable – through both identifying the curriculum used as the basis for admission and reporting a converted equivalent ATAR score.

Finally, Navitas would like to reemphasise the importance of common definitions, especially in relation to data and reporting requirements. For example, there would be benefits from closer alignment between admissions transparency categories, reporting requirements in TCSI and (for international students) information reported through PRISMS. This includes in efficiency and burden on providers, but also more importantly, ensuring information is consistently defined with the sector. Navitas supports the changes that were made to “Basis for admission” in TCSI which includes closer alignment with the admission profile categories recommended by the HESP. However, Navitas would also like to see greater integration and/or alignment with PRISMS in order to understand English language proficiency, basis for assessment and other factors. This will support more evidence-based decision making on admissions requirements for higher education courses.

Submitted on behalf of Navitas by:

Ethan Fogarty – Senior Manager, Government Relations, Navitas

(E) [ethan.fogarty@navitas.com](mailto:ethan.fogarty@navitas.com)

(M) 0411 024 20