12 May 2017

Secretariat

Admissions Transparency IWG  
C50MA7  
GPO Box 9880  
CANBERRA ACT 2601

Dear Professor Krause  
  
  
**Re: Consultation on admissions transparency implementation plan**

Australian Tertiary Education Network on Disability (ATEND) would like to thank you for the opportunity to provide feedback on the admissions transparency implementation plan. ATEND commends the Implementation Working Group on the paper and its intent.

ATEND supports all the recommendations outlined in the Higher Education Standards Panel (HESP) report on improving transparency in admissions, particularly those recommendations which relate to supporting students living with disability in making informed choices about further education.

However, ATEND has identified a number of issues which we believe need to be addressed before full implementation is possible. We therefore offer the following feedback:   
  
***Clear Information***

* The document proposes comprehensive course and institution information available in standardised templates. Whilst ATEND supports this idea, we are concerned that these documents could become unwieldy and difficult to interpret for some prospective students living with disability
* The standardised presentation of admissions information refers to course specific academic or non-academic requirements or prerequisites for entry. ATEND is working in collaboration with the National Disability Coordination Office to run a symposium in Melbourne on 27 June, entitled ‘[Towards a common understanding of best practice –](https://www.atend.com.au/resource/32/symposium-toward-a-common-understanding-of-best-practice-inherent-requirements-in-the-post-secondary-education-sector/) *[inherent requirements in the post-secondary education sector](https://www.atend.com.au/resource/32/symposium-toward-a-common-understanding-of-best-practice-inherent-requirements-in-the-post-secondary-education-sector/)*[.](https://www.atend.com.au/resource/32/symposium-toward-a-common-understanding-of-best-practice-inherent-requirements-in-the-post-secondary-education-sector/)  We intend to explore the nature of what is commonly known as ‘Inherent Requirement Statements’ for course admission and encourage the development by the Sector of a best-practice standardised template for such statements.

***Consistency***

* ATEND notes that secondary school exams are run by State curriculum assessment authorities and there is some inconsistency nationally in the availability of reasonable adjustments for secondary students living with disability who are sitting their final year exams. This could potentially place some students at geographically based disadvantaged on a national playing field. ATEND therefore emphasises the critical importance of special entry requirement schemes and equity related application processes that provide ATAR adjustments for equity category students.
* ATEND notes a recommendation (p10) to publish past admissions data *exclusive* of any adjustment factors that may have been applied, and is concerned that this will not give disadvantaged students clear information about their real chances of admission. However, p.32 defines a further category of ‘lowest adjusted ATAR to which an offer was made”. ATEND would encourage a consistent approach to the publication of lowest adjusted ATAR scores nationally.
* Although outside the scope of this paper, ATEND encourages the Federal Government to work with state curriculum assessment authorities to implement national guidelines on the provision of reasonable adjustments for secondary school examinations consistent with what is routinely available at tertiary level.

***Equity Categories***

* ATEND notes the categories propose by the IWG as a basis of admission to higher education (p29/30) and draws attention to the distinction between students who have completed some or all of a vocational qualification *whilst* studying secondary education and those who have completed some or all of a vocational qualification *after* secondary education. ATEND thinks that this is an important distinction to maintain so that equity category students who deliberately pathway into higher education through vocational pathway programs are not inadvertently disadvantaged by poor ATAR results.

***Accessibility***

* ATEND encourages the Federal Government to ensure that any national platform developed to house admissions information meets current accessibility guidelines and is fully accessible to people using screen reading technology, with particular attention to drop down menus, alt tabs for pictures and accessible PDF’s or equivalent single column Word documents available.

***Recommendations***

**Recommendation 1 – Clear information**ATEND supports the development of clear and plainly written templates of admission information, including a standardised template for course admission requirements, sometimes known as ‘statements of inherent requirements’.

**Recommendation 2 – Consistency**ATEND encourages the publication of lowest adjusted ATAR scores where applicable to provide transparent information to students living with disability and other equity category students.

**Recommendation 3 – Equity Categories**

ATEND emphasises that it is important to maintain special entry schemes and that where a student has undertaken vocational studies as a pathway into higher education that these results take precedence over ATAR, as indicated in the group a-d categories identified and the accompanying hierarchy.

**Recommendation 4 – Accessibility**ATEND recommends that all information be delivered in a fully accessible electronic format compliant with the highest accessibility standards.

Thank you for the opportunity to provide feedback on the implementation plan and for the high level of consultation on these reforms to date. Should you require further clarification on any of the matters raised in this submission, please contact Mr Anthony Gartner, President, Australian Tertiary Education Network on Disability on [agartner@swin.edu.au](mailto:agartner@swin.edu.au) or 03 9241 8852

Yours sincerely

Mr Anthony Gartner  
**President, Australian Tertiary Education Network on Disability**  
Manager, Student Equity and AccessAbility Services,

Swinburne University of Technology