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Higher Education Reform
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To the Department

Re: Consultation Paper on the reallocation of Commonwealth supported places for enabling, sub-bachelor and postgraduate courses

The University thanks the Department of Education and Training for the opportunity to comment on the consultation paper on the reallocation of Commonwealth supported places (CSPs) for enabling, sub-bachelor and postgraduate courses.

The ANU supports the brief of the Group of Eight particularly with its focus on postgraduate courses, and would like to add some context specific to the University and points on sub-Bachelor and enabling.

We support the move to strategically consider the allocation of CSPs, to ensure that the allocation is transparent to the sector, and not based solely on historical precedent. This ensures that places are allocated according to impact and national strategy. As flagged under '2.2 Process and Implementation' though, places must be allocated in alignment with funding agreements. As outlined in the paper this provides greater planning certainty and reduces regulatory burden. We would also be supportive of an approach that enables higher education providers to distribute the places between enabling, sub-bachelor and postgraduate levels according to strategic priorities. There would be many benefits to gain from this approach including but not limited to meeting the local needs of tertiary education students and workforce needs of employers, in addition to providing students with more options to complete shorter programs where aligned with their career.

Beyond this, funding allocations need to carefully weigh institutional mission and intent when considering the allocation process. Linking multi-year allocation of places with institutional mission and intent enables effective strategic planning around these places and movement beyond short term thinking. A process that considers allocation annually precludes planning and long-term strategic differentiation between universities.

The paper places a heavy focus on professional requirements in the allocation of Commonwealth Supported Places. Whilst this may be a significant factor when looking to short term outcomes, however, as outlined in 3.6 of *Shifting the Dial: 5 year Productivity Review* by the productivity commission¹, lifelong learning and skills formation is vitally important and overlooked with a heavy focus on professional requirements. The graduate of today will have an increasingly evolving set of work requirements, and there is a premium on new skills and thus preparedness for lifelong learning. Rather than focussing on professional accreditation, the focus should be on graduate employability metrics, as this is central.

An example of a qualification that is not professionally accredited but has strong industry demand is the Diploma of Languages. The Diploma of Languages at the ANU directly addresses industry needs specific to those of the National Capital. In Canberra the Department of Foreign Affairs and Trade (DFAT) and Department of Defence (ADO) employees and other public service employees (Australian Federal Police

¹ <https://www.pc.gov.au/inquiries/completed/productivity-review/report/3-future-skills-work#c35>

(AFP) /Department of Education and Training (DET) to name a couple) have a need for a language for deployment offshore or in the execution of their work, in Canberra.

Our experience has shown that these Diploma students tend to be those studying a double degree who have identified their potential career paths, and add on the Diploma as a language component to skill up for a competitive job market. This market is important to recognise when considering funding for sub-Bachelor places, rather than focussing solely on those using a sub-Bachelor qualification to transition to further study.

However, were we to look solely at job advertisements - the metric that has been applied for other schemes that look at 'industry need' – a Diploma of Languages would not appear to meet industry needs. If industry needs are to become key in the allocation of CSP's then metrics need to be appropriate to markets, geographical place and sufficiently broad. A blunt instrument of one size fits all will not address the issues the Government has identified as critical to need.

In the allocation of postgraduate places, should the focus remain on professional accreditation, we would broadly be supportive of a national list of approved professional programs with the ability to apply to the Department for places in professions that might be specific to region.

On enabling places, ANU has sponsored a number of places to give Indigenous students the opportunity to study at Australia's national university. These have been funded by the university given the importance of providing appropriate places. The metrics provided under 2.3 are largely retrospective, and significantly favour those who already have a large enabling place cohort through historical allocation. These metrics should be expanded to include strategic aims, to ensure that there is appropriate forward-readiness.

In 2018, we made a commitment to increase our national outreach and student diversity through launching a new admissions model, focussed on encouraging students from across Australia to go to university where they have the skills and ability to succeed. We recognise that we have significant action to undertake in this space. In light of this, representation of equity groups -a proposed criterion for allocation of postgraduate places -is a criterion that should be added for sub-Bachelor and enabling places.

I would be delighted to discuss potential options for the allocation process further with you, if desired.

Yours sincerely



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