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Consultation Paper on the Reallocation of Commonwealth supported places for enabling, sub-bachelor and postgraduate courses – response from Edith Cowan University

The following submission is made on behalf of Edith Cowan University (ECU) and is intended to contribute to the development of a rationale and framework for Commonwealth Government funding for enabling, sub-bachelor and postgraduate places that better responds to changing demand from students and industry, and government priorities.

ECU has consistently over-enrolled relative to allocated places, in both enabling and postgraduate coursework courses, and as such, is a key stakeholder for this consultation.

Consideration of other reviews

It is important that this consultation is cognisant of other policy developments and reviews currently being undertaken, given the potential for inconsistent outcomes. For example, the Australian Qualifications Framework Review's consideration of micro-credentials may affect the definition and status of enabling courses.

Resetting allocations to match existing demand

It is clear that the allocation process for all three categories of Commonwealth Supported Places (CSPs) needs to be reset, rather than simply adjusted in an attempt to correct for "...*historical and ad hoc decisions that may not be optimal*" (p1). This reset would be more effective than the "*evolutionary change*" proposed, but is also not "...*a zero based allocation of places...*" (p9).

CSP allocations should be based on actual past usage, with unused CSPs reallocated to those universities who have demonstrated high levels of demand from domestic students for courses that have not been fully supported by Government.

Other allocation principles

A minimum allocation should be set for each Commonwealth supported course, and ECU recommends that this minimum should be 20 places to aid planning and sustainability by universities and improve the effectiveness of funding support.

A small proportion of CSP funding should be withheld to provide resources for new courses currently in development. This would allow all universities to respond to emerging industry and student demand with the prospect of potential Government support.

ECU believes that a geographic distribution of CSPs would be highly problematic given the complexities of state differences in prevailing industry demands and labour market conditions, university student and course profiles, and differences in provision of vocational education and training, and rates of transition to tertiary study.

To support planning and sustainability for universities, the allocation of places should be tied to existing three-year funding agreements. These agreements already have annual review points, allowing for necessary small-scale adjustments.

It is important to exclude the University of Western Australia and the University of Melbourne from any amended allocation mechanism, given the distinct undergraduate/ postgraduate course structures in operation at these universities.

Understanding the purpose of enabling courses

ECU operates one of the largest and longest running enabling programs in Australia. As such, we recognise that people who complete such courses expect to have choice in their decisions about onward study. Therefore, judging the success of enabling courses by the rates of short-term transition to bachelor study, at the same institution, would be restrictive and counter-productive.

An enabling course completion, recognised by other universities as an accepted pathway to bachelor course study at their institutions, is the best measure of the quality of such programs.

It is important that all individuals with sufficient aspiration and motivation have the opportunity to experience university study. While for many students, completion of an enabling course provides preparation for successful study at bachelor course level, for others, it can be important in opening up other training, education or employment pathways and this should not be underestimated.

Enabling course delivery should be with a few providers

There is an opportunity to better focus financial support for enabling courses. The Commonwealth should consider designating a small number of 'enabling universities' across Australia; these being, primarily, the universities who can demonstrate a history of consistent high demand for their courses.

Within that framework, Commonwealth support for enabling course places might be restricted to students from recognised student equity groups, extended to include First-in-Family students and holders of Health Concession cards and their equivalents. Students from disadvantaged backgrounds are a significant cohort in enabling courses and the Commonwealth has an opportunity to target funding support in order to break the cycle of inter-generational educational disadvantage and long-term welfare dependency.

The Consultation Paper raises the issue of how to deal with 'uncommitted students'. This could be easily remedied using the existing VET Student Loan progression point model, to monitor attendance. This would provide a consistent national mechanism for removing inactive students, allowing the 'enabling universities' to focus academic and support services on enthusiastic and committed learners.

Sub-bachelor qualifications are under-valued

Sub-bachelor courses are not always undertaken only as a means of facilitating admission into a bachelor course at the same institution. The course may lead on to VET study or to entry into other higher education provider. The Government's prioritisation of sub-bachelor courses that fully articulate into bachelor programs at the same institution is therefore overly-restrictive. The value of sub-bachelor qualifications, as part of life-long learning and career progression in their own right, must be better recognised.

Better support for postgraduate coursework study is crucial to the knowledge economy

The Consultation Paper's analysis of take-up of postgraduate coursework CSPs (Table 3, p6) significantly understates demand for this level of study, because fee-paying domestic student load is excluded.

Applying the criteria of 'professional entry, skills shortage or national significance' to the allocation of postgraduate coursework CSPs ignores a critical element of professional skill development in a knowledge economy: personal responsibility for lifelong learning and the acquisition of new or extended skills by those already in the workplace. This benefits not just the individual, but society and the economy; filling areas of skills shortage in developing industries and technologies faster. While

not required for professional accreditation, such qualifications are often recognised and, in some cases, highly sought after, by employers.

“Professional entry” reflects occupational maturity and history and excludes “new” or developing professions such as Paramedicine and Occupational, Health and Safety. Eligibility for Commonwealth support might be expected to be guaranteed (but is not) when a course is accredited under Government acts or regulations such as under the Australian Health Practitioner Regulation Agency (AHPRA) and the Australian Institute for Teaching and School Leadership (AITSL).

In addition, ECU recommends that this review addresses the current inconsistencies in Commonwealth approval for CSP funding and eligibility for Centrelink support for students in those postgraduate coursework courses. A “joined-up Government approach” would see courses where a Ministerial Determination has been made in regard to Student Assistance (Student Assistance (Education Institutions and Courses) Determination 2009 (No. 2), qualifying for Commonwealth support to the university, as a matter of course.

Further information about this submission

If you require further information or clarification, please contact Steven Newman, Manager Strategy and Performance, by email: s.newman@ecu.edu.au or by telephone: (08) 6304 2296.

Yours sincerely



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