

February 2018

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

**ENQUIRIES**

Leon Morris  
Chief of Staff  
Office of Vice Chancellor

T: +61394793831  
E: [L.Morris@latrobe.edu.au](mailto:L.Morris@latrobe.edu.au)

## INTRODUCTION

La Trobe University is pleased to respond to the Consultation on the reallocation of Commonwealth supported places for enabling, sub-bachelor and postgraduate courses.

La Trobe is a multi-campus university covering central and northern Victoria with campuses at Albury Wodonga, Bendigo, Mildura and Shepparton – as well as our central campus in Bundoora, Melbourne, and a new campus in Sydney. La Trobe is second ranked in the state in serving rural and regional students with close to 9000 students from RRR areas studying at our campuses. One in five La Trobe students come from a low SES background,<sup>1</sup> and many are members of multiple equity groups.

La Trobe has a keen interest in the present consultation, for the availability of enabling, sub-bachelor (in La Trobe's case, diploma) and postgraduate coursework CSPs are central to our equity objectives. Supporting educationally disadvantaged people into degree programs through our innovative Tertiary Preparation Program (TPP) at the enabling level, as well as through Diplomas across our campuses, is integral to meeting our objectives around equity and inclusion. Commonwealth funding of postgraduate coursework builds on these objectives by encouraging participation in programs leading to professional accreditation and recognition in fields that tend to be disproportionately composed of people from middle and high SES backgrounds as well as leading to employment in socially essential professions, particularly in health and education.

The first object of the Higher Education Support Act (2003) is that Australia's higher education system be "characterised by quality, diversity and equity of access" (HESA 2003). This should be the central principle with which other funding and support measures adopted by government should align. We contend that a limitation on the availability of programs of study that best ensure quality, equity and diversity in higher education is antithetical to the HESA objectives, and that institutional participation rates of low SES students be the central measure in the allocation of CSPs at the enabling, sub-bachelor and postgraduate coursework levels.

## CONTEXT

La Trobe believes that an across-the-board return to demand driven funding is needed to ensure growth in participation by disadvantaged people in higher education. (We also address these concerns in our submission to the parallel consultation of Performance Based Funding for population-based growth funding above the 2017 freeze on bachelor CSPs.) We note that the introduction of Demand Driven Funding in 2012 had a substantially greater impact on low SES people than it did on university applicants generally, with low SES enrolments increasing 28.8 per cent over the 2011 to 2016 period against a background increase in enrolments of 21.6 per cent over the same period.<sup>2</sup> The present freeze – and moves to limit future places to, at most, population growth rates – threatens to undermine these gains. However, while we support a return to demand driven funding at the bachelor level, we recognise that, at present, government seeks to stem growth in participation in higher education by tying growth in MBGAs to broad population growth in the 18 to 64 year old population, necessarily limiting growth in participation as a percentage of the population.

Despite this broader context in the funding of higher education places, La Trobe maintains that **participation at the enabling and sub-bachelor levels should not be limited, and CSPs at these levels should be driven by demand**. In the more competitive market for bachelor places that restricted bachelor CSPs entails, those who have not had the opportunity to demonstrate their capacity through senior

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<sup>1</sup> Department of Education and Training Selected Statistics, 2017.

<sup>2</sup> Koshy, P. (2017). Briefing note. Equity students participation in Australian Higher Education: 2011 to 2016. National Centre for Student Equity in Higher Education (NCSEHE).

school grades – low SES; rural, regional and remotes students; new migrants – need the support and improved outcomes available at the enabling and diploma levels.

Similarly, postgraduate coursework CSPs offer the opportunity for those who are deterred by coursework fee levels the opportunity to move into areas of professional practice where people from low SES backgrounds are frequently under-represented. We note, however, that the present distribution of postgraduate Coursework CSPs across the sector is in large part driven by differences in institutional model, with the Universities of Melbourne and Western Australia, that each have a graduate model for their professional disciplines, receiving the largest share of CSPs. These institutions have argued that these CSPs help ensure that students who wish to pursue a professional qualification are not unduly dissuaded from doing so by the imposition of full fees. There is some merit to this argument. However, it is not clear that CSPs at institutions with a graduate model in professional disciplines allocate these CSPs on an equity basis, and it may be that the present distribution of postgraduate coursework CSPs is not sufficiently targeted at national equity objectives. Here, we suggest that equity be the main driver of allocations, but that other factors, such as institutional model and broader economic and workforce objectives may usefully play a role in allocations.

## EQUITY CONSIDERATIONS FOR AWARD LEVELS INCLUDED IN THE CONSULTATION

The levels of education that are subject to the present consultation are where social mobility opportunities are greatest and where participation is most likely to affect the future trajectories of individuals:

- **Enabling programs** provide the most effective means of addressing the needs of educationally disadvantaged and/or underprepared students entering tertiary education. An NCSEHE-led report using a survey of 2,500 Enabling students showed that students from low SES backgrounds have more than twice the rate of representation at the Enabling level than they do at undergraduate level, and that representation of Aboriginal and Torres Strait Islander people in Enabling programs is four times their population proportion (6 per cent of Enabling students and 1.5 per cent of population).<sup>3</sup> Research by La Trobe University's Centre for Higher Education Equity and Diversity Research found that students from refugee backgrounds, mature age students, and those from foster care backgrounds were more likely to enrol in a free Enabling program than any other pathway,<sup>4</sup> while a forthcoming study by Stokes discovered that around 30 per cent of students at an Enabling orientation session were from the lowest socio-economic decile.
- **Diploma level programs** are the most effective means of ensuring that educationally disadvantaged or otherwise underprepared students gain the skills necessary to progress to bachelor-level programs and to succeed once there. For example, through La Trobe University's sector-leading dual enrolment (degree-diploma) model delivered in partnership with TAFEs, communities in regional Victoria witnessed a healthy growth in participation at our regional campuses taking part in the program. Significantly, this growth was in areas like nursing and education: in 2018 around half of La Trobe's nursing commencements from the Shepparton campus came through the degree-diploma pathway. Articulation rates to a degree went from 5 per cent to 30 per cent when compared to previous models. (La Trobe has ceased offering this successful and evidence-based pathway due to funding constraints at regional campuses brought about by the CSP freeze and DET's decision not to fund HE CSPs delivered through TAFE.)

<sup>3</sup> Pitman, T., Trinidad, S., Devlin, M. Harvey, A., Brett, M., & McKay, J. (2016). Pathways to Higher Education: The Efficacy of Enabling and Sub-Bachelor Pathways for Disadvantaged Students. Report for the Australian Government Department of Education and Training. Perth, WA: National Centre for Student Equity in Higher Education, Curtin University.

<sup>4</sup> Andrewartha, L., & Harvey, A. (2014). Willing and enabled: the academic outcomes of a tertiary Enabling program in regional Australia. *Australian Journal of Adult Learning*, 54(1), 50-68.

- **Postgraduate coursework** provides entry to professional practice for many regulated professions and professions requiring professional accreditation. Participation in professional programs is unevenly distributed by socioeconomic status. Members of professions – particularly those in health professions – are also disproportionately drawn from high socioeconomic backgrounds. CSPs at the postgraduate coursework level provide the opportunity to introduce greater heterogeneity to the professions and break down social class barriers.

The Consultation Paper requests feedback from stakeholders on various means of allocating a limited number of CSPs at each level between Australia's universities. **We advocate for a demand-driven approach to funding enabling and sub-bachelor places**, for these are the levels where equity effects are greatest. **Absent a demand driven approach, we recommend that the pool of available CSPs for these course levels be allocated using a HEPPP-based formula as a central driver. For postgraduate coursework, allocation of CSPs should also have equity participation as a central driver, however institutional profiles, course outcomes (for example, professional accreditation) and workforce planning may also play a role.** We elaborate on these themes further in our responses to the questions posed in the Paper regarding distribution of CSPs below.

## RESPONSE TO THE CONSULTATION QUESTIONS

### 1. Should geographical representation be a consideration in distribution of places?

The demand for enabling and sub-bachelor CSPs is correlated with socio-economic status and (relatedly) to geographic region; therefore the distribution of such CSPs will necessarily be unevenly distributed across regions. However, **distributing CSPs to institutions that can provide evidence of strong demand will necessarily meet regional/geographic needs without the complication of including a geographic element to the allocation mechanism.**

The efficacy of using equity – specifically a HEPPP-based formula – to drive allocations of places in enabling programs is evidence based (We submit a paper on this issue by La Trobe's Professor Andrew Harvey<sup>5</sup> to assist the consultation process).

### 2. What is the minimum viable allocation for enabling, sub-bachelor and postgraduate places?

The minimum viable allocation will vary according to the pedagogical requirements of the course(s) for which the CSPs are sought and the characteristics of institutions hosting programs. A too-small allocation may not be sufficient for a course to run, and those places may not be used. This would not however indicate that there was not demand. There will not be a simple number reflecting viability.

### 3. How often should places be re-distributed? Should this vary for enabling, sub-bachelor and postgraduate places?

A balance should be struck between freeing up unused places for use elsewhere, and allowing institutions to manage small-scale shifts in demand. Ideally, institutions could retain a claim on unused places (or a proportion) for one (or more) further intake. There is no reason this should vary between course levels.

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<sup>5</sup> Harvey, Andrew. "Translating academic research to higher education policy reform: The case of enabling programs." *International Studies in Widening Participation* 4.1 (2017).

#### 4. What proportion of unused places should be reallocated? Should this vary for enabling, sub-bachelor and postgraduate places?

Were institutions to retain a claim on unused places for one or more further intakes, places from the previous to last (or equivalent) rounds should be available for redistribution. There is no reason this should vary between course levels.

We also note that institutions need to be able to absorb natural peaks and troughs in demand caused by external and regulatory changes. For example, the recent changes to initial teacher degrees in Victoria that set a minimum ATAR have impacted demand for teaching degrees in 2017 and 2018. The sector will recover demand in future as understanding and awareness of the increased requirements grows – indeed, the effect may raise demand if it also results in increased respect for the profession. However, had a significant proportion of unused places been reallocated during this period, Victorian institutions would be poorly placed to respond to future workforce needs, and future equity and regional access would be jeopardised. This example is evidence of the unintended consequences overly simplistic policy and regulatory approaches may have.

**Excessive redistribution is likely to be highly distorting and shift institutional activity in unintended and undesired ways.**

#### 5. What are stakeholders' views on the allocation criteria suggested in the consultation paper? Are there other criteria which should be considered?

This is the central question for the present review. As stated above, we advocate, in the first instance, demand-driven funding for enabling and sub-bachelor places, with HEPPP-based allocation should places remain limited. Equity should also be central to the allocation of postgraduate coursework CSPs, while recognising that other variables will also play a role at this award level. Here, we comment on the models proposed at each level in the discussion paper.

##### 5.1. *Enabling*

The broad principle suggested in the discussion paper is that places will be allocated to universities that achieve high standards of academic preparation and strong student outcomes. The principle underlying this measure is positive, however the appropriate means for ensuring standards and outcomes are via the instruments of TEQSA. Institutions that cannot demonstrate strong standards and outcomes would not be eligible for allocations under the HESA. We also note that enabling places are most valuable when they can prepare the otherwise unprepared. This means that any disincentives for institutions to serve students in significant need will be counterproductive to the intent of the programs. That is, outcomes such as completion are to a significant extent correlated with student characteristics like higher SES and more effective personal support networks. Completions for students at the enabling level are likely to be lower than those for students at study levels that attract more advantaged cohorts. La Trobe recommends that schemes reward performance rather than completion by measuring 'learning gain' and other indicators that reflect the value added by institutions.<sup>6</sup>

The Consultation paper suggests a number of metrics that might be useful proxies for quality and standards for enabling courses, including progression to further tertiary study; demand, as demonstrated by historical over enrolment; commencing students profile and demonstrated innovative teaching models. Again, we suggest that universities should be encouraged to demonstrate good practice such as strong articulation proportions and good teaching models by including students in the teaching model design, and by using the student voice as a metric that enables clear and transparent information that

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<sup>6</sup> Harvey, A., Cakitaki, B., & Brett, M. (2018). Principles for equity in higher education performance funding. Report for the National Centre for Student Equity in Higher Education Research. Melbourne: Centre for Higher Education Equity and Diversity Research, La Trobe University.

students can easily access and understand. We also note that students can presently compare institutional performance – although not at the enabling level – through QILT. In our submission to the parallel consultation on the AQF we argue that enabling level offerings should be regulated and subject to collections through QILT.

**Demand is the most important metric suggested among the models offered in the consultation paper**, however we note that the Consultation paper does not describe a way to measure *unmet demand* for CSPs. La Trobe presently has significant unmet demand for places in our enabling level TPP, particularly from students in Melbourne’s growing outer northern region. We call at the opening of this submission for an uncapping of enabling CSPs. This would allow us to meet this unmet demand and progress government’s and our own equity goals.

Finally, this section of the Consultation Paper asks how various metrics should be weighted. We recommend that the national pool of enabling (and other) places be allocated according to the HEPPP formula, which would place equity at the centre of allocations and remove the need for weightings and complicated formulas to act as proxies for need.

## 5.2. Sub-bachelor

The broad principle suggested in the discussion paper is that priority will be given to courses that focus on industry needs and/or fully articulate into a bachelor degree. **Articulation is an important principle for sub-degree programs if they are to meet equity and participation objectives.** This will be a subject of our submission to the parallel consultation on the AQF.

The Paper provides a large number of possibilities for assessing industry need: accreditation of the bachelor into which a sub-bachelor articulates; ‘documented evidence of employer support for the course’; the presence of WIL; strong employment outcomes; relationship to emerging industries including ‘Industry 4.0 competencies’ and local or regional skills shortages. With respect, we do not believe that government is well placed to regulate course responsiveness to employer needs or very specific competencies, and suggest that an overly complicated approach to measuring industry relevance would be likely to create distortions and perverse incentives. Course accreditation, WIL and relationship to local skills shortages are all factors that could be advertised to students through an expansion of information provided via QILT, ensuring that students are well informed by transparent and high quality information.

Other metrics proposed include existing utilisation of places; completions and transition to further study; attrition, and demonstrated demand and need. These are closer to what we would recommend in a student-centred allocation of places focussed on equity and participation. Our discussion points above about enabling places are also relevant here.

Finally, the Paper proposes that courses receiving CSPs should not be duplicated in the VET system. Again, this matter is relevant to the Consultation on the AQF. The present misalignment at AQF Level 5 (VET diploma / HE diploma) and AQF 6 (advanced diploma / Associate degree) needs to be resolved. The VET competency based training (CBT) model does not integrate smoothly with the scholarly, knowledge based environment in higher education. This makes it difficult to transfer students from a VET qualification into a HE course even where they may have the appropriate ‘level’ of entry qualification. Because of this, and **until these issues have been resolved in the AQF, it would not be appropriate to make courses that are replicated in the VET system ineligible for CSPs.** Further, students may have good reason to choose one variety of diploma over another (for example, a person undertaking a diploma of nursing may or may not wish to follow a career pathway requiring graduate nursing qualifications and may choose a VET or HE Diploma in the present system accordingly).

### 5.3. Postgraduate coursework

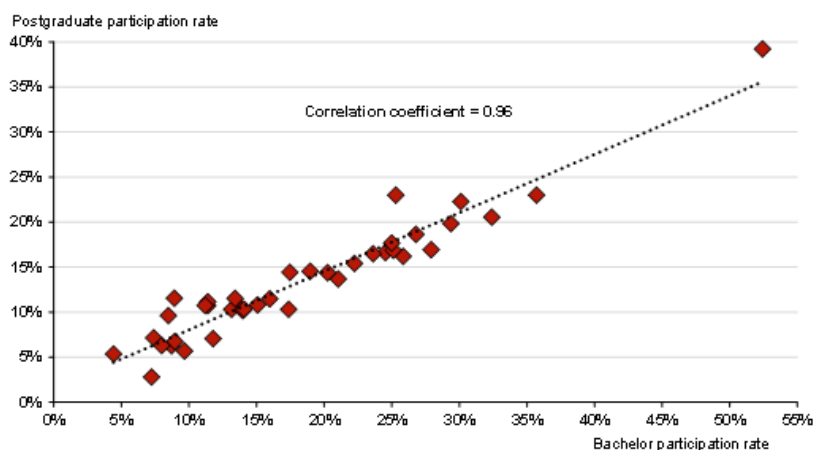
The broad principle suggested in the discussion paper is that places will be allocated to providers on criteria informed by professional requirements and community benefit. We would challenge this principle and recommend that places should be allocated with equity as a central object, in line with HESA, although a balance between equity, professional requirements and community benefit should be attained.

At present, postgraduate coursework CSPs are sometimes treated as scholarships for high-achieving students. This means that many students who are not in financial need of a subsidised place, and who would participate regardless, are utilising valuable CSPs. We agree that it is important that the Government continues to support the delivery of postgraduate qualifications where these are necessary for professional entry, to support rapid retraining in areas of workforce shortage or meet other national priorities. However, an equally important part of this requirement is that students from low SES backgrounds and who are otherwise disadvantaged are able to take part in professional careers often dominated by people from more advantaged backgrounds.

While the objects of HESA include supporting a higher education system that contributes to the development of cultural and intellectual life in Australia, and there is therefore a very strong argument to provide support to students studying in any discipline, we recognise that in the current, constrained system of Commonwealth funding, priority might well be given to courses that deliver significant community benefit. **We agree that priority for CSPs should be given to courses where the qualification is a minimum requirement for professional registration/accreditation by a recognised professional body; the minimum qualification legally required for practice in a profession or is the shortest possible pathway to a professional qualification.** However, we contend that this is in order that those who are deterred by fees are able to follow pathways into the professions and contribute to greater social heterogeneity within the professions.

Metrics proposed for the distribution of places in this section include: existing utilisation of places; student satisfaction; graduate employment outcomes, and representation of equity groups. Arguments posed above about perverse incentives, complicated proxies for quality and the role of transparent information via QILT in informing student choice are equally relevant here. We recommend that equity be a central consideration in allocating postgraduate coursework CSPs. This should be either where the student can demonstrate genuine financial need or other disadvantage, or, more simply, an allocation based at least in part on the institution's equity profile, as per HEPPP funding.

**We also note that the distribution of low SES students in postgraduate coursework programs at universities is highly correlated (0.96 correlation coefficient) with that of low SES undergraduates at the institutions (figure below).** Institutions that have a missions to serve low SES undergraduates are also well placed to serve low SES postgraduate coursework students and make best use of postgraduate coursework CSPs.



Source: Universities Australia enrolment data (2017)



## 6. How should criteria be configured to ensure that institutions do not become 'locked out' of future reallocations, especially where they have a limited track record in delivery?

This is an important question. For example, the University of Newcastle's fee-free enabling programs have run for over 20 years and are the largest enabling program nationally.<sup>7</sup> Approximately 70 per cent of students in enabling programs continue on to university study.<sup>8</sup> Institutions that pull more than their weight in equity and participation programs should not lose funding under any allocation scheme, as they may do even with a HEPPP based approach. Similarly, institutions need to be able to respond to demand and workforce needs in the provision of postgraduate coursework places, including CSPs. Flexibility is needed in any allocation model, and it is unlikely that a simplistic metrics-based approach will be sufficient to meet equity, sectoral and broader economic needs.

### KEY RECOMMENDATIONS

1. In line with the objectives of HESA, equity should be at the centre of allocation measures for CSPs.
2. Places in enabling and sub-bachelor courses should be allocated on the basis of demand.
3. If not allocated on the basis of demand, places in enabling and sub-bachelor courses should be distributed using the HEPPP formula.
4. Until misalignments between VET and HE qualifications at AQF levels 5 and 6 have been resolved (as possible through the present review of the AQF), it would not be appropriate to make courses that are replicated in the VET system ineligible for HE CSPs.
5. Postgraduate coursework CSPs should also be distributed with equity participation as a central driver (a HEPPP-based formula as part of the allocation measure); however institutional profiles, course outcomes such as professional accreditation and workforce planning may also play a role.
6. Institutions should retain a claim on unused places (or a proportion) for one (or more) further intakes, to ensure flexibility in load planning and in case of unexpected shifts in demand due to external pressures.
7. Where institutions to retain a claim on unused places for one or more further intakes, places from the previous to last (or equivalent) rounds might be available for redistribution. Excessive redistribution is likely to be highly distorting and shift institutional activity in unintended and undesired ways.
8. Any allocation model must be flexible. It is unlikely that a simplistic metrics-based approach will be sufficient to meet equity, sectoral and broader economic needs

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<sup>7</sup> Andrewartha, Lisa, and Andrew Harvey. "Willing and Enabled: The Academic Outcomes of a Tertiary Enabling Program in Regional Australia." *Australian Journal of Adult Learning* 54.1 (2014): 50-68.

<sup>8</sup> Trounson, A. (2012, May 19). Newcastle Uni the big winner from enabling boost as it enhances peer support. *The Australian*.