

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

Response from Macquarie University

2.3 Consultation issues – enabling places

- *Should geographical representation be a consideration in distribution of places?*

All institutions which show that they are able to perform effectively in the enabling space, demonstrating take-up and student success, should have equal access to any redistributed Commonwealth supported places for enabling courses. Where there are a number of institutions working in a geographical area, there would be obvious value in encouraging collaboration between them.

- *What is the minimum viable allocation for enabling places?*

As the Consultation Paper shows, the current distribution of commencing Commonwealth supported enabling places across institutions ranges from 0.2 to 80.7 EFTSL. Only a handful of universities have the places to build big enough cohorts of students to provide supportive learning networks. While some units can be co-taught with other students who are studying at award level, those students are more likely to build their networks with others enrolled in their award courses. Without such networks, students in enabling places may not be encouraged to complete their course or continue on to further study.

Institutions should be funded to a level where they can provide a cohort experience which encourages student success and ongoing participation. This will vary by institution, depending on teaching models and overhead costs, and at enabling level is likely to be a minimum of 20-25 places per course, per year. This level may also be achieved by groups of institutions working together to provide teaching and places.

A further advantage of this minimum level is that the revenue received will meet costs involved in employing and supporting suitably qualified and experienced teaching staff who are able to meet the specific needs of this cohort. This reduces the need to divert funds from other activities (given that, wherever possible, individual courses should be financially sustainable). It may also be an incentive for institutions who are currently not offering enabling places at all.

- *How often should places be re-distributed?*
- *What proportion of places should be reallocated?*

These two points are related and are addressed together.

Every effort should be made to maintain flexibility and to move places as circumstances change. However, this must be balanced against the need for sufficient time to establish new initiatives. Commencing entry should be reassessed annually, with more significant reviews of distribution every three years as part of each three-year funding agreement.

Decisions to add or remove load could then be based on both more robust data and strategic intent.

- *What are stakeholders' views on the following allocation criteria: (1) student progression to further study at tertiary level; (2) existing utilisation of places; (3) profile of commencing students; and (4) innovative teaching models?*

- 1) *Student progression to further study at tertiary level:* As the purpose of enabling courses is to provide access to tertiary education, measuring completion and onward progression is a reasonable approach. However, this indicator has its limitations. Universities without a history of delivery, or without a critical mass of enabling places, will be disadvantaged if this is the only basis for allocation. It should also be noted that where a student completes an enabling course but does not progress to an award course, this is not necessarily a "failure". Participation may have had other positive benefits (employment, social, etc) both for the individual and the community in which they live.
- 2) *Existing utilisation of places:* The number of enabling students currently taught as either Commonwealth-funded or domestic fee-paying students is a reasonable starting point here.

The Consultation Paper asks about how to 'avoid creating an incentive to fill places with uncommitted students in order to maintain an allocation of places'. However, such behaviour is unlikely. It would not benefit the institution, the teacher or the student and would be revealed through measures of retention and progression.

- 3) *Profile of commencing students:* The Consultation Paper proposes 'analysing the characteristics of the commencing student population from the previous year [to] identify the prevalence of any equity groups who may require support to participate in higher education'. The value of this approach is unclear.

Data here may reflect behaviour which is based on supply rather than demand. For example, in cases where a student's preferred institution was not able to offer a Commonwealth supported enabling place during the previous year, that student may have gone to another institution which was not their preferred option or location, but which was able to offer a place.

The Consultation Paper also proposes, as 'an alternative criterion . . . the profile of the institution's catchment area'. However, if preference is given to allocating enabling places to areas where there is high disadvantage, this may further reduce the choice offered to individual equity students. For instance, if a student's local university offers free enabling places, but its strengths and offerings do not meet the long-term needs and aspirations of that student, they may be put into a position of having no option but to take up the local place as opposed to going to a more suitable university.

It is proposed that each institution's strategic intent and demonstrable actions towards improving access for equity groups should be taken into account.

- 4) *Innovative teaching models:* Teaching models which reflect the needs of students engaged in enabling courses are essential. These may not necessarily be innovative but should reflect research-supported best practice.

- *What weighting should be given to these criteria (or other criteria that emerge in consultations).*

The following additional criteria are recommended:

- 1) A demonstrated track record of student success measured through retention, progression, and effective teaching models;
- 2) The capacity to teach enabling students as a cohort to support the building of networks; and
- 3) The capability of institutions to support students' broader social needs, including the needs of students from non-English speaking backgrounds.

Retention is included in (1) above as while the Consultation Paper mentions progression to tertiary courses, it does not specifically refer to retention and completion of students engaged in enabling courses.

- *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?*

Institutions should be allowed to demonstrate track record not only with Commonwealth supported students, but also in their work with other domestic and international students. Those institutions which would like to commence offering enabling courses, but do not have experience with either fee-paying or Commonwealth supported students, should be able to enter into direct discussion with the Department on this.

2.4 Consultation issues – sub-bachelor places

- *Should geographical representation be a consideration in distribution of places?*

All institutions which show that they are able to perform effectively in the sub-bachelor space, demonstrating take-up and student success, should have equal access to any redistributed Commonwealth supported places for sub-bachelor courses. Where there are a number of institutions working in a geographical area, there would be obvious value in encouraging collaboration between them.

- *What is the minimum viable allocation for sub-bachelor places?*

Institutions should be funded to a level where they can provide a cohort experience which encourages student success and ongoing participation. This will vary by institution, depending on teaching models and overhead costs and at sub-bachelor level is likely to be a minimum of 30-40 places per course, per year. Further refinement of this number rests on which courses are taught. It is likely that universities which choose to enter this space will use their expertise to offer courses across several faculties with differing service requirements (for example, access to labs), and allocations should reflect this.

- *How often should places be re-distributed?*
- *What proportion of places should be reallocated?*

These two points are related and are addressed together.

The Consultation Paper demonstrates clear under and over enrolment in sub-bachelor places across institutions. The under enrolment suggests that some institutions have chosen not to prioritise engagement in this space. It is proposed that for 2020, these places be removed from such institutions and that they are redistributed.

- Every effort should be made to maintain flexibility and to move places as circumstances change. However, this must be balanced against the need for sufficient time to establish new initiatives. Commencing entry should be reassessed annually, with more significant reviews of distribution every three years as part of each three-year funding agreement. Decisions to add or remove load could then be based on both more robust data and strategic intent.
- *What are stakeholders' views on the following allocation criteria: (1) courses address industry needs; (2) existing utilisation of places; (3) completions and transition to further study at tertiary level; (4) attrition; (5) demonstrated demand; and (6) demonstrated need? Are there other criteria which should be considered?*

- 1) *Courses address industry needs:* Macquarie University is committed to delivering courses of study which have embedded employability components. All undergraduate students have industry experience delivered through the PACE Program. However, we do not consider that at sub-bachelor level, students should be expected to enrol in courses that articulate to an accredited sub-bachelor course, or otherwise have higher requirements around meeting industry needs than do undergraduate courses. This would be inequitable, meaning that students who commence their university education at a sub-bachelor level would be provided with fewer options than those who enter for a bachelor's degree.
- 2) *Existing utilisation of places:* Where there is currently under-utilisation of places, this suggests that institutions have not chosen to invest in sub-bachelor provision to date, in

terms of developing attractive and meaningful opportunities and actively recruiting to those places. Where institutions make a choice not to specialise in this area, it is reasonable to redistribute these places.

The Consultation Paper asks about how to 'avoid creating an incentive to fill places with uncommitted students in order to maintain an allocation of places'. However, such behaviour is unlikely. It would not benefit the institution, the teacher or the student and would be revealed through measures of retention and progression.

- 3) *Completions and transition to further study at tertiary level*: Use of these measures is supported as they demonstrate institutional commitment to quality and excellence.
 - 4) *Attrition*: As the Consultation Paper suggests, this criterion 'would need to be designed to take into account variation in institutional mission and the characteristics of their student cohort'.
 - 5) *Demonstrated demand*: This measure would allow understanding of the overall pool of potential applicants and might be used to consider whether the total pool of sub-bachelor (or VET) places should be increased. However, utilisation of places is a better indicator to use for individual institutions.
 - 6) *Demonstrated need*: The Consultation Paper suggests that 'this could be assessed in relation to current post-secondary provision in the region relative to national average'. However, this criterion would need careful consideration. A clear definition of 'region' is needed, and an understanding of what comparisons would take place. For instance, having a VET provider in the same town does not automatically mean that students who want to go to university would gain the subject-based skills and knowledge to be able to do so. Where need is *demonstrated*, but *demand* is low, this could result in institutions receiving places which are not taken up.
- *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?*

The Consultation Paper demonstrates that there is a far greater demand for sub-bachelor places than are currently available across the country. Consideration should be given to increasing investment in this space to enable universities to seek places where demand exceeds supply and where they have demonstrable capacity.

2.5 Consultation issues – postgraduate places

The 2011 interim changes to the allocation of postgraduate places were introduced piecemeal. For example, the Consultation Paper states that while ‘criteria are used to assess requested changes to profiles, they have not been used to reassess the existing profiles’. This was not the case at Macquarie where the Department undertook a review of the entire postgraduate portfolio.

The changes were understood and implemented differently by different institutions with many waiting “to see what happens”. This uncertainty about current and future arrangements has resulted in some universities being reluctant to introduce Commonwealth supported Masters courses and has meant that allocations have been underutilised.

This has occurred with combined undergraduate/postgraduate degrees where all load is counted as undergraduate. These are often closely linked degrees (for example, a degree which combines a Bachelor of Engineering with a Masters in Biomedical Engineering) and where the student needs to enrol in both at the start of their study rather than later transferring into the higher degree. The sector is still waiting on formalisation of arrangements for this type of enrolment.

Further, the current process for determining which postgraduate courses qualify for places is opaque. In Education in particular, some providers have CSP allocation for non-Initial Teacher Education programs, while others have equivalent programs which are not approved. There is not a level playing field and for a prospective student, choices are limited. A more transparent and equitable system is needed. Added to this, changes such as the longer duration for a Master of Teaching are only now hitting demand for supported postgraduate places in some institutions; so, further places will be needed.

- *Should geographical representation be a consideration in distribution of places?*
All institutions which show that they are able to perform effectively in the postgraduate space, demonstrating take-up and student success, should have equal access to any redistributed Commonwealth supported places for postgraduate courses.
- *What is the minimum viable allocation for enabling, sub-bachelor and postgraduate places?*
This is highly variable, depending on courses taught and whether they are offered to, and attract, both Commonwealth supported and fee-paying students. Note that at a Masters level, more students are likely to study part-time due to work and other commitments, and this may be reflected in patterns of load, and in costs.
- *How often should places be re-distributed? Should this vary for enabling, sub-bachelor and postgraduate places?*
- *What proportion of places should be reallocated? Should this vary for enabling, sub-bachelor and postgraduate places?*

These two points are related and are addressed together.

The Consultation Paper shows clear under and over enrolment in postgraduate places bachelor across institutions. However, as mentioned above, uncertainty around policy on postgraduate places has meant that institutions may have been reluctant to develop new options in this space. It is proposed that for 2020, places be reallocated from institutions where there is very large underuse to institutions which are over-enrolled. Then, the status quo should be maintained until 2022 to allow universities to establish strategies and courses for postgraduates. After this time, it would be appropriate to revisit allocations.

- *What are stakeholders' views on the following allocation criteria: (1) which courses are subsidised; (2) existing utilisation of places; (3) student satisfaction; (4) graduate employment outcomes; and (5) representation of equity groups? Are there other criteria which should be considered?*

- 1) *Which courses are subsidised:* The Consultation Paper suggests the following considerations: (a) 'the course delivers significant community benefit where private benefits may be more limited and where graduate salaries may be comparatively lower while demand for skills is high'; (b) 'the qualification is a minimum requirement for professional registration/ accreditation by a recognised professional body'; (c) 'the qualification is the shortest possible pathway to a professional qualification'; or (d) 'the qualification meets an identified skills shortage'.

Some balance needs to be achieved here between on the one hand approaches (a) and (d) which appear to be intended to address community benefit and on the other hand approaches (b) and (c) which appear to address individual benefit. However, this distinction needs to be qualified. While teaching and nursing (for example) have clear community benefits and as professions generally offer lower salaries, other options are not so clear cut. A lawyer may go on to practice in a community law centre or a top city firm; a psychologist in an NGO or private practice.

- 2) *Existing utilisation of places:* The Consultation Paper suggests that 'this could be measured by historical over and under enrolment, comparing allocations with actual use' and that 'significant over-enrolments at an institution may indicate that there is strong demand'. This may certainly be employed as a crude baseline but needs to take into account anomalies caused by (for example) planned changes in load, which may result in over/under enrolment during a transition period.

The Consultation Paper asks about how to 'avoid creating an incentive to fill places with uncommitted students in order to maintain an allocation of places'. However, such behaviour is unlikely. It would not benefit the institution, the teacher or the student and would be revealed through measures of retention and progression.

- 3) *Student satisfaction:* As the Consultation Paper suggests, this measure 'would provide some weighting to the quality of teaching and learning' and is therefore supported.
- 4) *Graduate employment outcomes:* As the Consultation Paper suggests, 'consideration will need to be given to the range of external factors which influence graduate employment' and, with this qualification, use of the measure is supported.
- 5) *Representation of equity groups:* Using current levels of representation as an indication of future 'targets' may not be a useful approach in all institutions. Where current representation is low, reducing places may simply perpetuate barriers to entry. It is proposed that the institution's strategic intent and demonstrable actions towards improving access for equity groups should be taken into account.

- *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?*

To facilitate strategic initiatives as new disciplines emerge or needs change, it is proposed that at postgraduate level there is a mechanism to apply for new allocations outside the standard three-year funding cycle. For instance, a pool of places could be created and distributed annually based on strategic need.