

UNIVERSITIES AUSTRALIA SUBMISSION

REALLOCATION OF COMMONWEALTH SUPPORTED PLACES FOR ENABLING, SUB- BACHELOR AND POSTGRADUATE COURSES

FEBRUARY 2019

This work is licensed under a **Creative Commons Attribution 4.0 International Licence**.

Further inquiries should be made to the Chief Executive:

GPO Box 1142 Canberra ACT 2601
Ph: +61 (0)2 6285 8100
Fax: +61 (0)2 6285 8101
Email: contact@universitiesaustralia.edu.au

UNIVERSITIESAUSTRALIA.EDU.AU

ABN 53 008 502 930

CONTENTS

Contents	3
Introduction	4
Enabling places	5
Sub-Bachelor places.....	6
Postgraduate coursework Places	8

INTRODUCTION

As the peak body for Australia's 39 comprehensive universities, Universities Australia acknowledges the need for more clarity and certainty regarding the allocation of Commonwealth supported places (CSPs) for enabling, sub-bachelor and postgraduate places. The higher education sector will operate in a more efficient and more effective way if allocations of places are aligned with demand.

However, UA also notes the unavoidable complexity of the allocation process, given the distinct mission and needs of each university and the various factors that currently need to be considered.

Australia's higher education sector is a vital component of and contributor to Australia's social and economic wellbeing. It is UA's view that this review should consider any policy change with careful attention to maintaining:

1. a strong and sustainable higher education sector;
2. access and support for all students who wish to undertake higher education and have the capacity to succeed; and
3. Australia's current and future economic and social needs.

UA also notes that students should not be disadvantaged from one year to another during the allocation process.

UA also believes it would be more appropriate to align the reallocation process with funding agreements, to provide both universities and students with greater certainty. Annual reallocation would confuse both universities and students.

At all three levels, allocation methods should include a clear and transparent process for universities to apply for additional places. This will enable institutions to respond to changes in demand and will make it less likely that a university can be 'locked out' of allocations.

UA is not convinced that 'geographic representativeness' should be a criterion in allocation of places. In any case, this concept – as expressed in the discussion paper – is somewhat unclear. It is UA's view that skilful design and rigorous application of other, more immediately relevant criteria on demand for places and participation by students from under-represented groups would deal well with issues of geographic representativeness.

UA does not believe it is possible to set thresholds for 'minimum viable allocation' of places across the sector. The minimum number of places needed to maintain the viability of programs will differ by level of education, by field and by institution.

UA welcomes the partial reallocation of places proposed in the discussion paper. A reallocation of this kind will enable meaningful effort to align demand and supply, without the very significant disruption and uncertainty that would necessarily be involved in reallocating all designated CSPs. A periodic partial reallocation will also enable Government to fine tune the process and respond to unexpected development and unintended effects. The paper's proposal to reallocate a 5 per cent share of commencing places seems reasonable.

UA does not seek to prescribe how CSPs should be allocated. Instead, we outline suggested principles that should guide allocation of CSPs at the three different levels.

ENABLING PLACES

Enabling places exist to provide an alternative pathway into university for students who need to further their skills before entering higher education. It may be that these students have not completed year 12, did not achieve the marks required for entry to university, or are beginning study at a mature age.

Universities offer enabling places as a way of extending opportunity and access, and on the understanding that they will support students into undergraduate study. It is worth noting, however, that even if students do not continue their study, they will still have gained skills and knowledge that will benefit them in their working and personal lives.

UA endorses the principles set out in the consultation paper on allocation of Enabling places. High standards of academic preparation and strong student outcomes are key indicators of Enabling courses' success. We advise that 'strong student outcomes' should focus on transitions to further study, whether at the university where a student did an Enabling course or at another institution.

Just as importantly, criteria should include evidence of demand for places, so that Enabling places can most effectively increase access to university. In addition, procedures for allocating Enabling places should include a clear and transparent process through which universities can apply for additional places.

UA recommends that:

- **increasing opportunity and access, particularly for students from under-represented groups, should be a significant consideration in the allocation of CSPs for enabling places;**
- **the criterion of 'strong student outcomes' should focus on progression to further higher education;**
- **criteria should include evidence of demand for places; and**
- **there should be a clear and transparent process for allocation of additional places.**

SUB-BACHELOR PLACES

Sub-bachelor places play an important role in higher education by providing students with the opportunity to work towards a qualification, while at the same time recognising that qualification as an entry point to bachelor-level study.

Sub-bachelor places also play an important role in supporting access and opportunity to students who may wish to undertake university education but may not be well prepared to go straight into a Bachelor degree. This is particularly relevant in areas where access to other forms of tertiary education may be limited.

The consultation paper proposes the criteria industry need, or full articulation into a Bachelor degree (for pathway courses) and concurrent enrolment in a Bachelor degree (for, e.g. language diplomas).

UA urges caution about a requirement for full articulation. Imposing such a strict requirement may work to undermine the distinctive purposes of sub-Bachelor programs as pathways into higher education. In particular, sub-Bachelor courses which – for legitimate and necessary reasons – include content that is at a lower level than the curriculum of first year Bachelor programs may not satisfy such a criterion. This potentially applies to many courses including foundation study skills, literacy and numeracy and other content designed to equip under-prepared students for the rigours and challenges of study at Bachelor level. This is the very purpose of a pathway course.

UA welcomes the inclusion of concurrent enrolment in a Bachelor degree as a criterion. This will support universities to continue to offer Diploma courses, for example in foreign languages that are in high demand and which equip students with diverse and necessary skills beyond the focus of their Bachelor degrees.

UA cautions against including an explicit criterion linking allocations to industry needs. As the Department itself recognises in the discussion paper, there is 'no process to cyclically reassess skill shortages and whether places remain allocated where skill shortages have been resolved'.¹ Further work could be done on how Government might examine skills shortages.

As with Enabling places, UA recommends that allocation criteria should include evidence of demand for places to maximise the contribution of sub-Bachelor programs to expanding access to university. There should also be a clear process for applying for additional places.

¹ Department of Education and Training, *Reallocation of Commonwealth supported places for enabling, sub-bachelor and postgraduate courses discussion paper*, 2018, p. 14.

UA recommends allocation of sub-bachelor places:

- **consider how best to increase access and opportunity in higher education, and respond to demonstrated demand for places;**
- **include (where appropriate) a criterion on articulation into Bachelor degrees, but not full articulation;**
- **avoid using an explicit criterion on industry needs, and consider ways to better understand skills shortages;**
- **include a criterion on evidence of demand for places; and**
- **include a clear and transparent process for allocation of additional places.**

POSTGRADUATE COURSEWORK PLACES

Considering community benefit and minimum requirements for entry to professions are appropriate criteria for allocation of postgraduate places. However, we note the need for further work to develop workable criteria to give effect to these intentions.

UA strongly supports the inclusion of equity and access measures as a criterion. It is important that Government consider how allocation of CSPs could be used to improve participation of students from under-represented groups in postgraduate study.

While postgraduate qualifications are perhaps more closely linked to employment outcomes than enabling or sub-bachelor courses, UA reiterates our concern about the lack of accurate methods to predict or measure areas of skills shortage.

The discussion paper recognises of the need to consider context — including the fact that many postgraduate students are already employed — in assessing graduate employment outcomes. Beyond this factor, it will be important to ensure that the measure takes account of and controls for labour market conditions – both the regional or local labour market which a university’s graduates enter, and changes in the labour market and the broader economy over time.

The use of student satisfaction data requires a nuanced and thoughtful approach. The process should take account of differences in student satisfaction between disciplines and have regard to student characteristics.

Finally, criteria for allocation should include explicit recognition of demand for places. It is important that mechanisms for allocation of postgraduate coursework places include a clear and transparent process by which universities can apply for additional places.

UA recommends that:

- **the Government consider community benefit, qualification requirements for professional entry, and increasing access and participation when allocating postgraduate CSPs;**
- **measurement of graduate employment outcomes take account of context, including students’ employment status while studying, local/regional labour markets and changes in the broader economy over time;**
- **use of student satisfaction data take account of differences by field of education and student characteristics;**
- **criteria for allocation include explicit consideration of demand for places; and**
- **mechanisms for allocation of places include a clear and transparent process whereby universities can apply for additional places.**