

## Reallocation of Enabling, Sub-bachelor and Postgraduate Commonwealth Supported Places

### Submission by University of Canberra

February 2019

The University of Canberra refers to the discussion paper on the *Reallocation of Commonwealth supported places for enabling, sub-bachelor and postgraduate courses* and welcomes the opportunity to provide feedback on this policy.

The University of Canberra, like many institutions, has misalignment between allocated designated Commonwealth supported places and actual enrolments. This has been a cause for concern for a number of years and the University of Canberra is keen to resolve allocations.

In considering this policy, the University of Canberra again raises the need for long-term funding security to allow education providers to plan responsibly into the future.

The load management issues around designated Commonwealth supported places demonstrate the frustrations of operating in a restrictive capped funding environment.

The University of Canberra strongly holds the position that the demand driven system provides the best model for the allocation of Commonwealth supported places. The University of Canberra would welcome a restoration of the demand driven system and inclusion of sub-bachelor places.

This submission considers the discussion paper and addresses some of the issues presented.

Included in this submission is an alternative two-staged approach to reallocation, proposed by the University of Canberra.

### The University of Canberra

The University is incorporated under the University of Canberra Act 1989 of the Australian Capital Territory.

It is committed to serving the people of Canberra and the region through professional education and applied research.

The University of Canberra is ranked among top universities globally by both Times Higher Education (THE) and QS World University Rankings and appears in the 2018 THE rankings as one of the top 100 universities under the age of 50 years and one of the top 100 universities in the Asia-Pacific.

The University of Canberra's Strategic Plan 2018-2022, *Distinctive by Design*, provides an ambitious blueprint to position the organisation as a sector-leading university for the professions, guided by the principles of entrepreneurship, innovation, equity and diversity.

## Feedback on the discussion paper

The University of Canberra would like to provide the following comments regarding the discussion paper.

### 1. Allocation and utilisation of designated places

The discussion paper identifies that there is a significant gap between the allocation and utilisation of designated Commonwealth supported places (excluding medicine) by institution and across the sector.

The current distribution of these places across higher education providers reflects historical, ad-hoc decisions from 2011 onwards. It is clear that these allocations do not match actual enrolment patterns and need review.

Most universities have had unfilled postgraduate Commonwealth supported places.

Some universities have had over-enrolments in sub-bachelor places. Under the demand driven system these could be pipelined into uncapped bachelor places. Such universities have covered the cost of only partially funded pathway places, receiving student contributions but not Commonwealth contributions. Now that funding for bachelor level Commonwealth supported places has been capped, some universities may reconsider their sub-bachelor and pathway load profile.

Many universities would like funding for additional sub-bachelor places. The University of Canberra notes that the Government does not have an accurate indication of unmet demand in sub-bachelor places. Universities have not had an opportunity to provide this and the mechanism for providing forward load estimates does not allow for it.

**The University of Canberra recommends the Department of Education and Training undertakes an exercise to gauge unmet demand for designated places.**

### 2. Enabling and Sub-Bachelor places

Enabling and sub-bachelor places provide access and pathways to university. These places meet community, social and equity needs.

Entering some students directly into bachelor level may set them up for failure. Pathway places should be an essential part of the solution to improve university performance such as attrition and retention.

Under the demand driven system bachelor places have increased while enabling and sub-bachelor remained designated. Some universities may have enrolled students in bachelor places who would have rather benefitted from preparatory courses and pathway options, including enabling or sub-bachelor.

**The University of Canberra calls on the Government to adequately fund sub-bachelor places.**



### 3. Postgraduate places

Many postgraduate courses are now the minimum requirement for professional qualification and accreditation. Workforce demands and the need for professional qualifications mean certain postgraduate courses should continue to be allocated Commonwealth supported places.

The University of Canberra notes parallel Department of Social Services policy around approved masters courses for students seeking Centrelink and welfare payments. There is an administrative burden on universities to maintain two separate yet similar registers of Commonwealth supported postgraduate courses.

**The University of Canberra encourages the Department of Education and Training to work with the Department of Social Services to reconcile policies regarding postgraduate courses.**

### 4. Performance-based allocation of places.

The discussion paper raises an option of performance-based allocation of designated places.

The University of Canberra refers to its submission on *Performance-based funding for the Commonwealth Grant Scheme (CGS)*.

The University of Canberra acknowledges the significant public investment in universities through the Commonwealth Grant Scheme and the requirement for accountability and performance reporting.

The University of Canberra does not, however, agree that performance measures should be used as the basis for allocating a limited number of additional Commonwealth supported places.

Defining success for universities can be complex and problematic. Defining success for student cohorts in designated places, in particular sub-bachelor, would be vastly different than for non-designated places.

**The University of Canberra strongly opposes a performance-based approach to the allocation of designated places.**

### 5. A university-specific approach to allocating places

The University of Canberra suggests that a “one-size fits all” approach to allocating designated places would not resolve the current misalignment. Ideally, reallocation of places should be based on demonstrated need as well as demonstrated demand. Universities are best placed to understand this.

A university-specific approach would recognise the diversity of Australian universities, their place within regions and their students and consider target markets and unique circumstances.

**The University of Canberra advocates for a university-specific approach to the reallocation and allocation of designated places.**

## 6. Proposed five percent claw-back and cyclical review

The discussion paper proposes a small claw-back of designated places from institutions to then be reallocated, suggesting a cyclical or iterative approach to allocating places.

A five percent reduction in commencing places across all clusters has been suggested as a simple and straightforward approach to reallocation. The University of Canberra understands this may be an attempt to pipeline load.

The University of Canberra does not agree with this approach. In the discussion paper it has been demonstrated that there is a significant misalignment and imbalance between allocations and actual enrolments across institutions and clusters. It makes no sense to make changes so small that they do not in fact realign places.

Most importantly, it makes no sense to cut places that are likely to be filled by universities. This does not meet the policy intent to realign places.

**The University of Canberra opposes a claw-back approach to reallocating designated places.**

## 7. Timing and annual allocation of places

The discussion paper has raised questions around the timing of allocation of places.

The University of Canberra would like to raise the issue of long-term funding security to allow education providers to plan responsibly into the future.

Universities invest resources in planning and forecasting student load. Funding for this load needs to be pipelined across more than one year. Funding places year on year will create a great deal of uncertainty and instability.

The cost of establishing courses and budget setting is significant. University planning also includes activities around student recruitment, staffing, timetabling and room allocation. These activities require an accurate estimate of funded places well in advance of the start of the year.

**The University of Canberra advocates for the allocation of designated places in line with three-year funding agreements.**

## Alternative approach to reallocation of designated Commonwealth supported places

The University of Canberra would like to propose an alternative approach to reallocation and notes the following:

1. Current university allocations of designated places are significantly misaligned with actual enrolments across course level and funding cluster.
2. A proposed five percent claw-back of load and redistribution is unlikely to realign load in the next year or two.
3. The Department of Education and Training has not fully gauged unmet demand, particularly for sub-bachelor places. Universities are best placed to have a sense of this.

Given this, the University of Canberra recommends an alternative two-staged approach:

### Stage 1: University reallocation in 2020

- Universities propose their own reallocation across course level and cluster mix within their current funding total for designated places.
- Universities provide a business case for initial reallocation. Proposed changes would need to meet specified requirements for enabling, sub-bachelor and postgraduate places.
- Reallocation in 2020 would be subject to Department of Education and Training approval.

### Stage 2: Sector-wide reallocation from 2021

- All unfilled places in 2020 returned to 'central pool'.
- Universities may request additional places from 2021 and present business case demonstrating demand and need. Proposed changes would need to meet specified requirements for enabling, sub-bachelor and postgraduate places.
- Department of Education and Training will allocate any additional places.
- It is suggested that new places from 2021 be incorporated into three-year funding agreements.