



VCD19/35

The University of New England's Response to the Department of Education & Training's consultation paper on the reallocation of Commonwealth supported places for enabling, sub-bachelor and postgraduate courses.

Introduction to the University of New England

Located in Armidale, in the heart of northern inland New South Wales, the University of New England (UNE) was the first Australian university established outside a capital city. With a history extending back to the 1920s, UNE has a well-earned reputation as one of Australia's leading universities.

Through its pioneering role in the provision of distance education, UNE has contributed to the nation's development for more than half a century — while enhancing the lives of thousands of people who would otherwise have been unable to pursue university studies. Today, UNE is extending its reach through the adoption of the latest digital technologies, and is recognised as an innovator in flexible online education.

Response to the discussion paper

UNE is pleased to have the opportunity to provide feedback on the *Consultation Paper on the Reallocation of Commonwealth Supported places for enabling, sub-bachelor and postgraduate courses*.

In response to the criteria for the reallocation of enabling places outlined by the Department, UNE offers the following suggestions:

- *Student progression to further study at tertiary level:* This is a good measure of success, however, the proposed method of measurement needs to be carefully considered. There are many reasons, other than institutional factors, why students do not move from an enabling course into a bachelor level degree the next year. It would therefore be more useful to consider the continuation rate for the two or three years following the completion

of an enabling course. It is also important to ensure that continuation is measured across the entire system, and not just continuation with the provider of the enabling degree, as this would account for geographic and digital migration.

- *Existing utilisation of places:* UNE agrees that historical data can give a good indication of demand, and supports the reallocation of unused enabling places to areas of demand. To avoid the perverse incentive that this may create, it will be important to have periodic reviews of success rates and graduate outcomes, such as progression to further study or employment for specific cohorts.
- *Profile of commencing students:* UNE agrees that priority for enabling place allocation ought to be placed on cohorts of students that are typically underrepresented in higher education participation. Although allocation should not be strictly defined by demand in catchment areas, it is appropriate that the providers in regional catchment areas be allocated places to support the retention of students in the regional areas.
- *Innovative teaching models:* UNE strongly supports the proposed encouragement for institutions to develop innovative delivery models, particularly the need to move away from the dominant concept of full-time on-campus education. Qualifications should be flexibly delivered to ensure that students are able to update their skills and it is important that there is recognition of the changing nature of the relationship between students and institutions. UNE has a record of success with its Indigenous enabling program, which focuses on preparing Aboriginal and Torres Strait Islander students for tertiary study in a culturally sensitive and supportive way, and which is delivered with innovative use of contemporary teaching resources and customised tutorial support both face-to-face and online.

In response to the criteria for the reallocation of sub-bachelor places outlined by the Department, UNE offers the following suggestions:

- *Courses address industry needs:* While UNE agrees that it is appropriate to consider industry demand for some courses, this should only be applicable for courses which lead to professional accreditation, or are a pathway to enrol in a professionally accredited degree. Success in this regard should be measured by employment outcomes. Where the study related directly to identified industry needs, reallocation could occur where there was strong market demand and tangible and broad economic benefit to do so. Industry needs should not replace market demand as the primary driver for allocation of support.
- *Existing utilisation of places* UNE supports the reallocation of places from those institutions who are underutilising their allocations on an annual basis, and that this reallocation should be prioritised to those institutions that are oversubscribed.

- *Completions and transitions to further study at tertiary level:* This is a good measure to include in the allocation of CSP for sub-bachelor course, as long as the long term trends in the data for different cohorts is well understood. For example, part time students may take longer to complete, and some students may elect to take a year off before continuing onto further study, and some sub-bachelor courses may stand as qualifications in their own right. Cohort characteristics of underrepresented groups should also be taken into account.
- *Attrition:* Attrition should be taken into account, however targets must be adjusted and relevant to known characteristics of the cohort across the sector. UNE would support a similar performance based funding system to that proposed for the Commonwealth Grant Scheme for non-designated places, which may take into account cohort specific characteristics around retention and progression. There needs to be recognition that the traditional model of attrition does not take into account the changing and innovative modes of delivery, such as dip-in, dip-out enrolment and longer-term accumulation of learning and skills, and that the timeframe for completion or realisation of outcomes needs to reflect this. As such, unit completions may also be an appropriate measure of success in this regard.
- *Demonstrated demand:* UNE believes that it is important that any reallocation of sub-bachelor funding is based primarily on market demand as opposed to industry needs, as discussed earlier in this response.
- *Demonstrated need:* It is important that the reallocation of sub-bachelor places responds in part to existing or inherent structural deficits associated with some cohorts, which has precluded achieving necessary results in the past to support academic opportunity of achievement. This could be linked to the needs of particular regions or sections of the population. For example we know that Indigenous Australians remain underrepresented in terms of higher education participation.¹ Given this identified need, consideration should be given to allocation to institutions which specifically work with communities to address this need.

In response to the criteria for the reallocation of postgraduate places outlined by the Department, UNE offers the following suggestions:

- *Which courses are subsidised:* UNE believes that this should be primarily driven by market demand. However, it is appropriate that national skills priority areas be supported by the

¹ Indigenous Australians currently represent 1.7% of participants in higher education as opposed to 3.1% of working population. p.68 *Closing the Gap: Prime Minister's Report 2018*
<https://closingthegap.pmc.gov.au/sites/default/files/ctg-report-2018.pdf>

allocation of funding for appropriate postgraduate courses. As the nature of work changes on a global scale, it is important to understand that there will be increased demand for postgraduate courses as people seek to update or augment their existing skill base in order to compete in a dynamic employment market.

- *Existing utilisation of places:* UNE supports the reallocation of places from those institutions who are underutilising their allocations on an annual basis, and that this reallocation should be prioritised to those institutions that are oversubscribed. This could be done on a historical basis, as well as on a market demand basis.
- *Student satisfaction:* With regard to student satisfaction, UNE would support the use of existing sources of information, such as that which informs the QILT survey, to inform the allocation of Commonwealth supported postgraduate places.
- *Graduate employment outcomes:* Similarly to student satisfaction, UNE would support the use of existing sources of information about graduate employment outcomes for students who have participated in post graduate awards.
- *Representation of equity groups:* As with the feedback provided for enabling courses and sub-bachelor places, UNE supports the notion of allocating funding for postgraduate course to those institutions which best support certain equity groups. Regional populations are likely to be more adversely affected by changes to the nature of work, and will have fewer opportunities to adapt to new or emerging industries. Therefore, more postgraduate places could be allocated to regional areas to support improved outcomes for re-skilling and employment transition prospects in regional areas.

With regard to the summary questions, UNE provides the following specific response:

Should geographical representation be a consideration in distribution of places?

UNE would support an approach to a model of distribution that takes into account the specific educational demographic of regions when allocating enabling, sub-bachelor and postgraduate Commonwealth supported places.

With regard to enabling and sub-bachelor places, this could take into consideration the level of educational attainment in a region. For example, regional and remote areas tend to have a higher proportion of students from low socio economic backgrounds educational attainment is generally lower than metropolitan areas – high school completion rates are often lower and consequently, participation in higher education is lower. More enabling and sub-degree places could be allocated to regional areas to support improved educational outcomes and higher levels of educational attainment in regional areas, particularly to support Indigenous participation and attainment.

With regard to enabling, sub-bachelor and postgraduate courses, UNE would support a model of distribution that took into account the economic and employment market requirements for each region. For example, if the offshore relocation of a particular industry required that a large percentage of the work force in a region required re-skilling, extra places should be allocated to support this.

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

UNE is of the view that the current overall quantity for enabling, sub-bachelor and postgraduate coursework places is the minimum viable allocation pool and that this amount should be maintained as a minimum amount. It is clear from the data provided by the Department that past allocations have been underutilised by some institutions, while other institutions have oversubscribed. On this basis, the underutilised places should be reallocated as there is clearly demand in the system.

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

There are two dynamics at play in the frequency of distribution; the need for certainty in budgeting and the desire to ensure the most efficient allocation of places. UNE supports the annual redistribution of unused places, where an institution has demonstrated over a period that they do not intend to use these places. As this would have a neutral impact on budget planning for the institution not using places, and a potential positive impact for the recipient institution, more frequent redistribution is appropriate. If there is ever a case where used places are reallocated, the affected institution should be given sufficient notice of the reallocation to allow for continuity of delivery to continuing students who may take several years to complete, and to plan for the unfavourable budget outcome. A notice period of three years should be sufficient in most cases.

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

In the first instance, UNE would support the reallocation of those places which were not utilised. Going forward, there may be cause to reallocate a specific proportion of postgraduate places to certain disciplines conditional on identified industry requirements, for example, a change in nursing qualification requirements may require the allocation of extra CSPs to ensure that those with existing qualifications are able to continuing practice without being disadvantaged by lack of access to a CSP for their course.

As above, we should support the reallocation of all long-term unused places. Where there is a decision to reallocate places that are used on the basis of industry need or performance criteria

the reallocation should be negotiated with the institution bearing in mind the operational and financial issues associated with teaching out continuing students and adjusting budget plans to accommodate the reduced grant income.

What are stakeholders' views on the allocation criteria suggested above? Are there other criteria which should be considered?

UNE commends the Department for providing a clear overview of the proposed principles of allocation and in response to these suggests the following proposed, supplementary principles of allocation:

- That places should be reallocated to those institutions that have a track record of exceeding their allocation due to a strong market reputation and demand.
- That enabling and sub-bachelor places should be reallocated to regional providers to support educationally disadvantaged areas. The value of a more educated regional population cannot be overstated.

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?

UNE believes that institutions with a limited track record of delivery could have requests for allocations considered on the basis of their performance with regard to other forms of Commonwealth funding, such as that susceptible to the performance based funding scheme for the non-designated Commonwealth grant scheme.

Should you wish to discuss our submission further, please contact vcadministration@une.edu.au.