



4 February 2019

Department of Education and Training  
[cqs@education.gov.au](mailto:cqs@education.gov.au)

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

Thank you for the opportunity to provide comment on possible approaches to the reallocation of designated load within the sector. As the paper identifies, the current allocation is a product of differing policy decisions and institutional arrangements over time which has led to significant distortions in the allocations. For this reason, and the need for greater transparency in the allocation methodology, the University of South Australia (UniSA) supports this review.

With regard to the issues and questions raised in the consultation paper, UniSA makes the following comments:

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

UniSA does not support a geographical component to the distribution of places. The patterns described in Chart 6 and Chart 7 of the paper, are a product of the social and economic context in which each university operates. This is particularly the case for sub-bachelor load in response to educational and socio-economic disadvantage within those regions. Adoption of an allocation methodology that takes account of the profile of the university and its response to the context in which it operates, as discussed further below, will better deal with this issue than the addition of geographically based criteria within the allocation methodology.

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

The analysis presented in Table 4, based on a flat reduction of 5%, we believe is too blunt an instrument and may cause significant shocks to the system or to some universities. It also does not consider the differing use and levels of institutional flexibility between enabling, sub-bachelor and postgraduate places. For example, access to fee-based places for postgraduate courses enables each provider to better manage/phase in a change in allocation compared with the CSP requirements of sub-bachelor places where fee alternatives do not exist. A 2020 implementation might present significant strategic risks to some universities should they lose 5% of load in one or more of the course types. UniSA therefore recommends that the

Professor David G Lloyd  
Vice Chancellor and  
President

Chancellery  
Hawke Building  
Level 4, 55 North Terrace  
Adelaide  
South Australia 5000

GPO Box 2471  
Adelaide  
South Australia 5001  
Australia

t +61 8 8302 0502  
f +61 8 8302 0501

[www.unisa.edu.au](http://www.unisa.edu.au)

CRICOS Provider Number 00121B

minimum viable allocation for each course type will need to be separately established and that the circumstances of individual universities will also need to be considered.

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

UniSA recommends that the re-distribution of the places should be aligned to Funding Agreements. As acknowledged in the consultation paper, and as discussed above, this would enable a smoother transition and allow the sector to better manage strategic/financial shocks within a given university. Under this arrangement, there is no need to add further complexity by attempting to create different allocation regimes for each course type.

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

The enrolment trend data included in the consultation paper gives some indication of both the proportion of places that might be re-allocated and that the level of reallocation will need to vary between enabling, sub-bachelor and postgraduate places. As commented above, the capacity of a given institution to absorb a loss of places is greater for postgraduate load than for sub-bachelor load given access to fee paying places at Masters level.

The emerging reduction in the uptake of postgraduate places across the sector is symptomatic of a range of issues some of which can be better addressed by sector through different models for the provision of professional development and upskilling separate from the provision of masters level qualifications for the professional workforce. The allocation criteria for postgraduate coursework places suggested in the paper accommodates this distinction. The enrolment trends, combined with a criteria-based allocation process to ensure appropriate demand can still be met, would suggest, that a reallocation of between 3% and 5% across the sector would be reasonable.

The situation for enabling places and sub-bachelor places is less straight forward. The enrolment trends described in the consultation paper are more extreme in the patterns of over and under enrolment and are made more complex by the re-purposing of places by some universities. The significant variation in the number of places between universities and, acknowledging the communities that some of these universities serve, would suggest that more analysis is required to determine the proportion of places that can be re-allocated for both enabling and sub-bachelor courses.

UniSA does not support the commentary on page 11 regarding the comparability of VET preparatory course and university-based enabling courses. The NCSEHE Pathways to Higher Education report<sup>1</sup> found higher education retention rates were generally better for disadvantaged groups who entered via enabling pathway courses in comparison to those who entered via VET or OUA pathways. Once again indicating that more detailed analysis is required before a reallocation process is undertaken.

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<sup>1</sup> Pitman, T. and Trinidad, S. 2016 Pathways to Higher Education: The efficacy of enabling and sub-bachelor pathways for disadvantaged students NCSEHE report



**5. What are stakeholders' view on the allocation criteria suggested above? Are there other criteria which should be considered?**

UniSA supports the proposed criteria for the reallocation of enabling places.

UniSA supports the proposed criteria for the reallocation of sub-bachelor places but would recommend that:

- Articulation of sub-bachelor courses into degree programs be a separate criterion for all sub-bachelor courses and not just applied to professionally accredited courses;
- The "Demonstrated Need" criterion be expanded to consider the education attainment level of the working age population for that region.

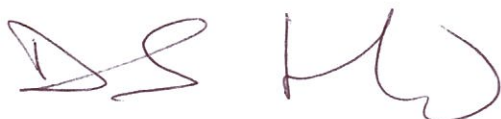
UniSA supports the proposed criteria for the reallocation of postgraduate places.

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

By aligning the allocation/reallocation process to the Funding Agreement provides an opportunity for negotiation within the parameters set by each of the course types allocation criteria. We do not believe further nuance is required. Indeed we would be concerned by a process which returned the sector to the opaque allocation processes of the past.

Should you require any further information please do not hesitate to contact the University through Adrienne Nieuwenhuis, Director, Office of the Vice Chancellor ([adrienne.nieuwenhuis@unisa.edu.au](mailto:adrienne.nieuwenhuis@unisa.edu.au)).

Yours sincerely

A handwritten signature in blue ink, consisting of a stylized 'D' followed by 'S' and 'L'.

Professor David G. Lloyd  
Vice Chancellor and President