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

Thank you for the opportunity to respond to the consultation paper on the reallocation of Commonwealth supported places for enabling, sub-bachelor and postgraduate courses.

UTS strongly supports demand-driven allocation of enabling and sub-bachelor Commonwealth supported places to facilitate the streaming of students into higher education via the pathway that most suits their preparation and to support specific sub-bachelor courses required by industry and the professions. As resources required to develop and provide enabling and sub-bachelor courses are equivalent to bachelor courses, these places should be funded at the same level as bachelor places. Enabling and sub-bachelor places could be managed within providers' allocations of bachelor places without adding to the overall funding envelope while facilitating better management of student cohorts by each provider.

The arbitrary, inequitable and ill-founded current model for postgraduate funding has been recognised by all across the sector as requiring change. The challenge is how and to actually do it, as it will disturb the comfortable status quo. Further, Australia's response to the predicted trends in the future workforce and societal skills required will be dramatically curtailed by the current funding model.

UTS supports a student-centred model for the allocation of Commonwealth supported postgraduate places. The inequities of the current model can be addressed through the use of quite specific criteria for courses and/or student characteristics, with the recipient then accessing the place at their university of choice. UTS would prefer to see fewer Commonwealth supported postgraduate places in favour of demand-driven enabling and sub-bachelor places.

UTS does not support the allocation of Commonwealth supported places for 'professional development', assuming that these refer to micro-credentials or other non-award study at a postgraduate level, as funding them from the available pool is not sustainable. However, access to FEE-HELP for such students would be highly beneficial as this growing category of courses will support critical skill development and industry transition and development.

The consultation paper essentially proposes a continuation of the current allocation model with somewhat different but equally broad criteria. UTS is of the view that this will continue the inequities of the current system but with the addition of an additional administrative burden for all stakeholders and increased funding uncertainty for providers and students. If the current or proposed approach is adopted, UTS proposes places unused over an agreed period are reallocated rather than redistributing places in use.

Some comments on specific proposals raised in the paper are provided below.

## **Enabling**

UTS strongly supports demand-driven allocation of enabling Commonwealth supported places, even if within the current capped funding allocation. The significant unmet demand for Commonwealth funded places is reducing prospective students' pathways to higher education, with bachelor places more attractive even though enabling places may be more appropriate. Including enabling places in the demand driven system will allow providers to more effectively stream students according to their academic preparation.

Enabling courses are not only used for general preparation for higher level study but used to support specific skill development for example, maths preparation for engineering, science and other disciplines. The development of courses and support provided to students in these programs requires a funding level equal to bachelor courses. Enabling courses are fundamental elements of student success in disciplines critical to Australia's economic growth and development.

Full fee-paying enabling courses are a significant disincentive to further study. The cohort most likely to benefit from enabling study is also likely to be the most risk-averse to debt. We believe full fee-paying enabling courses to be highly inequitable.

The suggested funding principle for enabling courses is for places to be "allocated to universities that achieve high standards of academic preparation and strong student outcomes." UTS acknowledges the requirement for high quality courses but the paper provides no indication of how this principle might be implemented. If there is to be a restricted funding pool it seems inevitable that good quality enabling courses will be locked out of the model based on their comparative position rather than their fundamental quality. UTS would be concerned that particular student cohorts would be locked out of the system.

If Government is seeking to "remove barriers for under-represented groups" as the consultation paper suggests, wide access to enabling places is critical to support students less well prepared to enter bachelor degree study and these are often from groups under-represented in higher education.

## **Sub-bachelor**

UTS agrees with the proposition in the consultation paper that the combination of capped sub-bachelor places and demand-driven bachelor places is likely to attract students to enter higher education at the bachelor level rather than sub-bachelor regardless of their academic preparation or an assessment of what is actually needed for their work aspirations. The resultant lack of demand for sub-bachelor courses means that providers do not differentiate their offerings to the extent needed to serve industry and the professions. Enabling, sub-bachelor and bachelor courses offer a continuum of study that caters for differing levels of academic preparation and differing skill requirements for work. They should all be part of the demand-driven system so that student choice is optimised, student academic preparation is accounted for, and there is no disincentive for universities to offer a range of course types.

As the consultation paper highlights, sub-bachelor places will often be fully articulated with bachelor degree courses and/or specifically targeted at that level as a result of industry fit. Our estimation is that Commonwealth supported sub-bachelor places will not be a large additional expense to Government as many students would otherwise be supported in bachelor places, but the availability of sub-bachelor places will better respond to students' needs. Should the funding cap continue to be applied, sub-bachelor funding could be subsumed within that envelope, allowing providers the flexibility to offer sub-bachelor places consistent with their students' characteristics and industry orientation.

The proposed sub-bachelor allocation principle is that "priority will be given to courses that focus on industry needs and/or fully articulate into a bachelor degree." It is highly likely that the vast majority of sub-bachelor courses will meet these criteria. Rather than creating a process where most courses will be approved, it would be more efficient and effective to include sub-bachelor places in the demand-driven allocation.

If an “industry needs” criterion is used for sub-bachelor allocation, it should be more specific and applied to all courses of that type across the sector. If applied at the institution level, over time allocations will become as opaque and inequitable as current postgraduate allocations

## **Postgraduate**

UTS has long advocated for a fundamental rethink of the allocation of postgraduate places, with allocation based on specific criteria and places allocated directly to students for use at any relevant university. UTS supports the continuation of a restricted allocation model but current arrangements have resulted in highly inequitable outcomes for students and providers. Student choice and provider equity could be reintroduced to the system if allocation was student-centred – places would be directly allocated to students who meet the criteria and they could use those places at any university offering the relevant course.

The consultation paper proposes incremental implementation of a redistribution of the existing number of places. UTS suggests that this approach will achieve little in terms of addressing the inequities of the current approach - the criteria are not specific enough to achieve a different outcome to the current arrangements. More importantly, as the criteria will not be applied universally, only by application and limited by the available allocation pool, the inconsistent use of Commonwealth supported places for essentially the same courses will continue to occur and possibly become more fragmented as small numbers of places are redistributed across the sector.

The proposed allocation principle - “places will be allocated to providers on criteria informed by professional requirements and community benefit” - does not appear to be materially different to current arrangements. We would rather that the criteria be more specific and perhaps narrowed to allow for a more consistent and transparent system that allows students equitable access to courses. Historical allocations should be phased out, perhaps using the reallocation system proposed, but based on more specific criteria.

Essentially a simple and effective new approach would be to centre the allocation of postgraduate CSPs on students. UTS would argue that a reformed system could work along the following lines:

1. Have the areas of national priority for which Commonwealth funding is available identified by a transparent process and published for prospective students to see.
  1. These areas can change over time to meet national need
  2. These areas can be related to domain needs i.e. nursing or societal agendas i.e. all Indigenous postgraduates.
  3. The government can limit the support i.e 4000 nursing students or make it unrestricted i.e. all Indigenous students who apply.
2. Allow universities to specify the courses for which they will allow government supported places, the academic admission requirements they have in place for those courses, and the number of places they are prepared to offer. Have these published and communicated to students.
3. Administer a simple merit based selection process (similar to what is currently administered by the various state Tertiary Admissions Centres) to make offers of scholarships to students conditional on acceptance in a relevant course at an appropriate university.
4. Concurrent with 3, students apply to individual courses at their chosen universities exactly as the current postgraduate enrollment system operated.
5. Four potential outcomes
  1. Student is successful in commonwealth scholarship and admission to university of choice – student enrolls in university and commonwealth funding follows the student to the university.
  2. Student is unsuccessful in commonwealth scholarship but successful in admission to university of choice – Student has a choice of continuing enrollment but must pay full fee
  3. Student is successful in commonwealth scholarship but unsuccessful in admission to university of choice – the scholarship is rescinded after an appropriate period of time that would allow the student to apply to eligible courses at other universities
  4. Student chooses an area which does not attract commonwealth support. Student applies for admission and if successful, pays full fee as per current system.

Universities have been doing this sort of selection using mechanisms developed through Tertiary Admission Centres for years in other areas, and it allows Commonwealth funding to be strategically

assigned, students to have more choice and universities to compete on the quality and outcomes of their courses. It would also support innovation in the sector and align postgraduate education with the future of work. Such a system would be transparent, equitable, allow government to only fund courses of national priority and these priorities to change appropriately over time.

### **Professional Development**

Postgraduate education, in particular, is transitioning to new forms of credentials. This evolution is likely to provide more timely and narrowly focused modules which may ultimately lead to a degree but will also stand in their own right. Assuming these are the 'professional development' courses referred to in the consultation paper, UTS does not propose that the very limited funding allocation for postgraduate education be diluted by the inclusion of such courses, and certainly not on similar criteria. However, student access to FEE-HELP for such courses will be increasingly important in order for workers to achieve timely skill development to cater for industry transition and the emergence of new industries.

A handwritten signature in black ink, appearing to read 'Brungs', with a stylized, cursive script.

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