Response to the consultation paper on the reallocation of Commonwealth supported places for enabling, sub-bachelor and postgraduate courses

Introduction
Griffith University is committed to ensuring that people from all backgrounds can access, participate and succeed in tertiary education to the level of education and skill they seek. Changes to employment patterns, with predicted declines in lower skilled jobs, and growth in jobs that require at least bachelor’s degrees, mean that universities will increasingly need to facilitate the preparation of mature students, who may not have met conventional entry standards. Thus, ensuring provision of enabling places will be critical to this change.

Likewise, the expansion of professions that require a master’s degree for entry level certification, (particularly in health), will require careful consideration to ensure places are allocated effectively and in line with student demand. This review is therefore timely and significant.

Current allocations of both sub-bachelor and postgraduate places are largely historical, resulting in significant differences between institutions and in some cases, states. There are numerous instances of over- and underutilisation of places. The rationale for continuing with the current funding allocation is unclear.

Griffith supports a move to a funding distribution mechanism that better matches places to student need and university strategic intent. Ongoing review and reallocation of places as proposed in the consultation paper is critical to address allocation inequities and respond to both changing demands and national priorities.

With this in mind, Griffith welcomes the opportunity to respond to the Government’s consultation paper on options for the future allocation of Commonwealth Supported Places (CSPs) for enabling, sub-bachelor and postgraduate courses.

1. Should historical geographical representation be a consideration in distribution of places?
Data presented in the consultation paper highlights significant differences in the distribution of sub-bachelor (including enabling) and post-graduate places between states, as a result of historical distribution that has not been subject to recent review. Differences between individual universities are even greater.

This review should consider whether there are compelling reasons to maintain the current unequal distribution, and whether an apparent lack of uptake of places reflects a demand or a supply issue.

For example, it could be assumed that postgraduate demand is lower in Queensland because there are historically fewer postgraduates studying degrees here than other states (as seen in
Chart 7). However, fewer postgraduate students may simply reflect the lack of places available. This review provides a critical opportunity to ensure allocations match demand and need.

This review should also consider mechanisms to address differing rates of population growth across states and major regions, and, particularly in relation to enabling places, the need to address relative socio-economic disadvantage.

The allocation mechanism needs the flexibility to grow funded places in regions that: are historically underrepresented; has a population that is growing faster than the national average; comprises many low SES residents; or, has low participation rates.

The city of Logan, within Griffith University’s catchment, is one example that fits this description. Logan is one of the fastest growing cities within Australia, with the current population of 320,583 people (2017) projected to grow to 490,522 people by 2036 (4.3% pa growth, compared with that of Queensland at 1.7% pa).

According to the 2016 Census, 35% of Logan City’s population falls into the most disadvantaged Socio-Economic Indexes for Areas (SEIFA) quintile, and only 7.6% are in the least disadvantaged quintile. Participation rates in the City of Logan are currently only 60% of those of Brisbane, and significantly below national rates. The 2016 Australian Census reports that only 9.3% of Logan residents had attained a bachelor’s degree or above, which is well below Queensland’s average of 18.3% and Australia’s average of 24%.

Griffith’s historically low allocation of enabling places is clearly inadequate to support the aspirations of the Logan community, or communities served by our other campuses.

Griffith therefore contests that geographical representation is an important consideration in funding reallocation, especially for enabling and sub-bachelor places, alongside population growth and other key factors such as emerging workforce needs and relative socioeconomic disadvantage (particularly pertinent for enabling places). Ensuring equitable access to higher education for underserved and disadvantaged areas across our nation is essential.

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

Data presented in the consultation paper have confirmed the significant maldistribution of places, which is particularly apparent in enabling places, where the majority of universities over enrol (Chart 5).

A number of universities, including Griffith, have received very little funding for enabling places, constraining their ability to address often significant local need for tertiary education pathways. It is for this reason we strongly recommend a large-scale, initial reworking of current allocations to rapidly redress these issues.

Ideally, enabling and sub-bachelor places should be demand-driven. At a minimum, in the absence of demand-driven funding, we propose that each university seeking to offer enabling places should receive at least 250 places. This would be a sustainable program and make a
meaningful contribution to providing pathways for disadvantaged students into both higher education and higher skilled work. Given the evidence in the consultation paper of the under-supply of CSPs, additional funding to achieve this modest increase in capacity is well justified.

In the absence of this initial injection of places, it will take a long time to achieve a more equitable distribution of places, and areas such as Logan will continue to suffer from a lack of pathways to higher education for their relatively under-qualified population.

If this funding is not forthcoming, a significantly greater proportion of places will need to be reallocated in the first two to three years to re-base load before moving to the more modest 5% reallocation.

A regular reallocation of up to 5% of places should be sufficient to manage changing demand once the historical CSP imbalance in enabling places is addressed.

The situation is somewhat different for postgraduate places, as many universities have under-enrolled, at least in 2016, though this would have been addressed with the removal of places in 2018. In these circumstances, there is not the imperative to establish a minimum viable allocation, and a regular redistribution of 5% of places should provide sufficient flexibility.

3. How often should places be re-distributed? Should this vary for enabling, sub-bachelor and postgraduate places?
   Once the initial re-basing of places has been established, an annual re-distribution should be undertaken. This provides the flexibility to offer more places in areas of need more rapidly, as well as to evaluate the effectiveness of the criteria established for provision of these places. An annual redistribution also minimises the impact of losing places.

4. What proportion of places should be reallocated? Should this vary for enabling, sub-bachelor and postgraduate places?
   With historical funding disparities corrected, Griffith supports the reallocation of up to 5% of any university’s places per annum for enabling, sub-bachelor and postgraduate places.

5. What are stakeholders’ views on the suggested allocation criteria? Are there other criteria which should be considered?

5.1 ENABLING PLACES

The proposed criteria for reallocation:

The consultation paper proposes that targeted outcomes for enabling places should be based on academic preparation and strong student outcomes. Proposed criteria for enabling places are:
1. Student progression to further study at tertiary level (% progressing the following year)
2. Existing use of places (historical over and under enrolment)
3. Profile of commencing students (equity groups)
4. Innovative teaching methods

**Student progression to further study at tertiary level:**
Enabling courses offer students a low risk opportunity to experience high quality tertiary education and decide whether it fits their aspirations and abilities before making a larger investment in a degree course. We would therefore expect attrition rates to be higher in enabling courses than for Higher Education Standards Framework qualifications.

The national student progression rate of just over 50% reflects the effectiveness of enabling initiatives in supporting a broadening and inclusive higher education system. It also points to a vital gatekeeper function of identifying early those students capable of progressing to and succeeding in tertiary study and those who are unlikely to benefit from further tertiary study. The near 50% progression rate also signifies institutional quality is maintained when academically-less inclined students are not automatically articulated into a bachelor’s degree where it is demonstrated they are underprepared for the rigors of tertiary study.

Enabling courses represent a significantly smaller proposition and risk for both the Government and tertiary providers as well as for the students themselves compared with the costs of an uncompleted bachelor’s degree.

In addition, allowance needs to be made for those institutions that historically have not had large numbers of enabling students, and therefore do not have a significant track record of student success.

**Existing utilisation of places:**
As a first measure, reallocation of underutilised places to those universities that are over enrolled makes sense. However, this will not address the current issue of too few places allocated generally, nor consider the case of regions and universities where there is significantly greater need than places allocated.

We strongly argue for a new injection of funds to be allocated to new enabling places, to address the considerable (and likely growing) undersupply. In addition, a reallocation of existing (and any new) places should primarily address the uneven distribution of places initially.

**Profile of commencing students**
Enabling courses provide a pathway into higher education to many students from disadvantaged backgrounds. These students are often from categories that are under-represented in higher education: ethnic and Indigenous cultures; lower socioeconomic and disadvantaged populations; and, disengaged or mature aged students. Student profile should be a consideration in determining the allocation of enabling places.

It will also be important to take account of a university’s catchment demographics in determining how the profile of commencing students should be measured.

**Innovative teaching models**
Universities are in the business of employing innovative teaching approaches to deliver high quality courses and these should be an important feature of enabling courses. It may be challenging to measure and align funding to criteria such as the use of teaching innovation which is subjective in nature and constantly changing. Griffith therefore does not support the inclusion of this measure.

5.2 SUB-BACHELOR PLACES

Criteria for allocation of sub-bachelor places outlined in the discussion paper include:

1. Industry needs
2. Existing use of places
3. Completions and transition to further tertiary study
4. Attrition
5. Demonstrated demand
6. Demonstrated need

Although industry needs seems a sensible criterion for many sub-bachelor courses, it may not align well with Diplomas of Languages, which are typically studied concurrently with a bachelor’s degree. The use of existing places to meet demonstrated demand and need is an effective use of resources and measures that accurately reflect completion/transition to further tertiary study as well as attrition.

5.3 POSTGRADUATE PLACES

The consultation paper proposes five criteria for postgraduate places:

1. Each qualification’s specific logic for being Government funded rather than fee paying, targeting
   • Community benefit
   • Requirement for professional registration
   • Shortest possible pathway to a professional registration
   • Addresses skills shortage
2. Existing use of places
3. Student satisfaction
4. Graduate employment outcomes
5. Representation of equity groups

Griffith is generally supportive of these criteria, but with a number of qualifications. Agreement will need to be met on how to determine what is a requirement for professional registration, and whether a postgraduate qualification is the shortest possible pathway to a professional registration. Professional bodies in the Health sector, for example, have growing requirements for higher qualifications.

Addressing skills shortages will need to reflect regional circumstances, and funding should follow regional demand. We would seek to ensure that skills development is not prevented by prohibitive costs of postgraduate courses.
It is worth noting that past allocations have been inconsistent in application and based on a qualification being the shortest possible route to a specific professional accreditation. Growing specialisations and recognised skills shortages in specialised National priority areas (such as the Sciences) call into question the definition of a ‘profession’ and the wisdom of basing future funding on existing professional accreditation needs rather than the capabilities that will drive our economy forward. The Sciences represent one area in which there is a greater industry need for higher level skills than currently exists.

Griffith’s view is that each university should receive a postgraduate funding envelope and, guided by National priorities and targets, be responsible for determining how places can be best applied for community benefit and skill acquisition.

6. How should criteria be configured to ensure that institutions do not become ‘locked out’ of future reallocations, especially when they have a limited track record in delivery?

This is an important consideration for Griffith. Most universities have a limited track record in delivering sub-bachelor courses, and some have had limited opportunity to provide enabling places. Accordingly, any enabling, sub-bachelor and postgraduate reallocations should align with industry requirements, regional need and demonstrated pathways into degrees rather than solely on prior performance. Track record can be introduced over time, once universities have had the opportunity to demonstrate outcomes.