

SUBMISSION IN RESPONSE TO CONSULTATION PAPER ON SUB- BACHELOR COURSES

3 October, 2017

Universities Australia welcomes the opportunity to respond to the Consultation Paper on demand-driven sub-Bachelor places released by the Department of Education and Training (DET).

UA supports the extension of the demand-driven system (DDS) to sub-Bachelor places. We have advocated this for several years. Extending the DDS as proposed in the consultation paper will improve the policy framework for the funding and allocation of Commonwealth-supported places (CSPs).

However, we have some issues with details of the proposal and concerns about implementation. We also seek greater clarity on the policy objectives of the proposal as set forth, in particular the balance between provision of wider and more varied pathways into higher education, on the one hand, and provision of freestanding, work-relevant sub-Bachelor qualifications on the other.

UA looks forward to working with Government to implement this initiative in a way that is practicable and reasonable and that supports wider access to higher education and an even more reliable and responsive supply of skills to the labour market.

We address below the questions in the Consultation Paper and some other issues arising.

UA supports demand-driven funding of sub-Bachelor places

UA has long advocated the extension of the DDS to sub-Bachelor places. We believe that extending the DDS to sub-Bachelor places will widen access to higher education by providing a wider variety of pathways that are appropriate to different students' preparation, interests and needs, as well as providing a wider range of skills and qualifications to the labour market.

Removing caps on sub-Bachelor places will help to fill skills gaps in the economy, provide more choice for students, and provide an alternative route into a Bachelor degree.

Sub-Bachelor qualifications are valued by employers because they equip graduates with practical skills that can be applied immediately in the workplace. These courses build student confidence and increase students' potential to succeed. They are an excellent pathway to further degree level study.

For students who are less well prepared academically, completed sub-Bachelor qualifications improve retention and success at the Bachelor level.

The sector will work with Government to ensure a rigorous but responsive process for identifying courses to supply skills to the labour market, both directly from sub-Bachelor courses and through improved articulation from sub-Bachelors to Bachelor degree courses.

Sub-Bachelor awards: both pathways and freestanding qualifications

As UA's arguments in support of demand-driven sub-Bachelor places make very clear, we recognise the need for and benefits of wider provision of these courses both as pathways into Bachelor degrees and as valuable qualifications in their own right.

UA believes that the Consultation Paper places too much emphasis on pathways and does not give sufficient recognition to the value of sub-Bachelor awards as freestanding qualifications. This is unfortunate in itself, and has some unhelpful implications for elements of the proposal as detailed in the Paper. In particular, the requirement for 'full articulation' into a Bachelor degree is likely to constrain legitimate differences between courses at each level with respect to admissions requirements, course content and method delivery.

Criteria for course eligibility: articulation

The Government has clearly stated that to be approved for demand-driven funding, sub-Bachelor courses will have to fully articulate into Bachelor degree courses at the same institution. It is clear that this requirement refers to the structure of courses, and not to the study pathways of individual students.

UA supports in principle the requirement that approved sub-Bachelor courses articulate into Bachelor courses.

Nevertheless, the requirement expressed in the Consultation Paper that sub-Bachelor courses 'fully articulate' into Bachelor degrees does raise some issues.

First, a requirement of 'full articulation' (that is, requiring that one year of sub-Bachelor study always be recognised as worth one year of Bachelor study) goes beyond the stipulations of the Australian Qualifications Framework (AQF), which allows for credit recognition at less than 100 per cent of the first (pathway) course.

In principle, credit can only be recognised when it is at the same level in the pathway course as in the destination course. It is very likely that sub-Bachelor pathway courses – by their very nature – will include units that are not equivalent to the content of Bachelor degrees. For example, courses designed to prepare students for STEM courses at Bachelor level will often include senior secondary level Mathematics content that students at which students have not had the opportunity to succeed before. This is exactly the kind of content that a pathways course should offer, but it is not desirable that these units be recognised as equivalent to Bachelor level study.

The requirement of 'full articulation' potentially undermines the distinctive value and effectiveness of pathways courses by forcing them into a mould set by the first year of Bachelor courses. This is presumably not the policy intent.

Despite the requirement for articulation being set at the course level, the Consultation Paper states that DET will monitor the rate at which individual students articulate from approved sub-Bachelor courses to Bachelor degrees. It is not unclear where the bar will be set, and it would not be appropriate to apply a criterion across different courses.

Criteria for course eligibility: industry skills needs

UA supports the principle that approved courses should be those that address skills needs. We welcome the flexible approach to demonstrating industry relevance that is envisaged in the Consultation Paper. In particular, UA welcomes the proposed process for dealing with an institution's relevant courses in a batch, rather than on an individual course by course basis.

To ensure that new funding arrangements are reliable, both criteria for demonstrating industry relevance and processes for doing so must be transparent and predictable, and consistent over time. Decisions in respect of a particular course should be treated as precedents for assessment of other courses – including courses at other institutions – in later years. A demand-driven approach to funding places in sub-Bachelor courses must support provision of CSPs in courses that meet specified criteria. Decisions about which courses meet these criteria will of course be necessary, but should not be discretionary.

On a matter of principle, the principle of relevance to industry skills needs should be interpreted broadly and should not exclude future or emerging skills. Similarly, in line with the criteria set out on pages two and three of the Consultation Paper, ‘industry-relevant skills’ should not be limited to highly specific skills for particular occupations. For example, diploma courses in languages will often address skills needs in a way that is directly relevant to the labour market.

Student eligibility: no prior higher education qualifications

Restricting entry to demand-driven sub-Bachelor places to students without prior higher education qualifications raises some questions of both principle and procedure.

In principle, this restriction is consistent with the policy intent to improve pathways into higher education, particularly for students who have not had the opportunity to attempt or consider university study before. It is less relevant to sub-Bachelor qualifications considered as freestanding awards. In any case, this restriction would not support retraining by people who have already undertaken some higher education.

Another question concerns the practical implementation of this restriction: how will Government (or, for that matter, universities) know whether applicants have prior higher education qualifications? The Consultation Paper proposes that universities will send a list of prospective students’ CHESSNs to DET, which will check these against already existing records.

UA has some questions about this procedure:

- How will DET ensure that the timing of the process aligns with universities’ applications and offers processes and does not disrupt or delay offers?
- How will DET identify students who have completed a higher education qualification without using Commonwealth HELP assistance (for example, through paying up-front to study at a private provider)?
- Is DET confident that the Higher Education Information Management System (HEIMS) will consistently provide reliable data for the proposed process?

Falling between questions of principle and process is another important question about the treatment of sub-Bachelor courses which students undertake concurrently with Bachelor degree studies, in particular, Diploma courses in languages. Concurrent enrolment in a Bachelor degree and a Diploma language course does not, in itself, exclude a student from access to a demand-driven sub-Bachelor place. UA would welcome an assurance from DET that the Department does not intend to exclude these courses and students arbitrarily from the new system.

Process for course approval

As stated above with regard to criteria for course approval, UA welcomes the relatively flexible and straightforward process outlined in the Consultation Paper. A template for provision of information on courses will be helpful to universities. Assessing courses in a batch, rather than on an individual basis, will be more efficient and will help universities to offer places to students in a timely way.

Again, UA notes the importance of transparent, predictable and consistent criteria for course approval.

Timing

The proposed policy change raises several issues of timing for universities.

First, passage of the Government's policy package – or any part of it – through the Parliament remains uncertain. The earliest that the Senate could pass the relevant legislation is mid October. This does not give universities enough time to implement changes, especially those scheduled for 1 January 2018 – including the extension of demand-driven funding to sub-Bachelor places.

Accordingly, UA has advocated that implementation be delayed for 12 months. This would enable a more considered and effective implementation, which would be in the best interests of students, universities and the Government.

There should also be grandfathering provisions for students who are enrolled in sub-Bachelor CSPs at the time the new arrangements commence. Grandfathering provisions should also cover prospective students who are making decisions about sub-Bachelor courses before the new arrangements come into effect. In the absence of such provisions, students (and universities) would be unfairly disadvantaged by the policy change.

Monitoring of implementation

UA understands DET's interest in monitoring implementation of the new policy and take-up of places by students and universities. We recognise the need to account for public spending and to ensure that implementation realises the policy intent. UA stands ready to work with Government to achieve this.

We would, however, urge DET to use the processes outlined in section 5 of the Consultation Paper as an opportunity to discuss universities' plans and objectives with a view to provision of the right number of places in the areas needed. It would not be helpful to approach this part of the process from a point of view of compliance or expenditure reduction.

The policy intent is to make sub-Bachelor places demand-driven subject to criteria that focus Commonwealth support in areas of skills need. Once a course is approved, the number of places a university offers in that course is uncapped. UA supports the prudent safeguards built into the system, including the requirement on universities to provide DET with estimates of enrolments as well as ex post monitoring of rapid or unexpected movements in enrolments. We note, however, that rapid take-up of demand-driven places is not in itself necessarily evidence of dubious practice. The policy objective is make allocation of places in approved sub-Bachelor courses demand-driven, and thus more responsive to student and labour market demand than is possible under of centralised allocation through funding agreements.

UA notes that the Consultation Paper states that course approval will only be withdrawn where an institution's behaviour is 'not consistent with the policy intent'.

We urge DET to take an appropriately flexible approach to monitoring take-up of places, and to avoid any appearance of imposing soft caps after the fact, or of using a necessary monitoring process as a de facto funding agreement.

Recommendations

That Government:

- delay implementation of the higher education policy package – including demand-driven sub-Bachelor places – for 12 months to 1 January 2019;
- grandfather current students and prospective students who are making enrolment decisions before new arrangements come into effect;
- reconsider the requirement for ‘full articulation’ into Bachelor degrees;
- consider how prospective students with prior higher education qualifications might be reliably identified; and
- ensure that criteria for course approval (and monitoring of implementation) are appropriately flexible, while transparent and consistent.