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Australian Government Department of Education and Training

By email: HEReform@education.gov.au

Sub-bachelor Commonwealth-Supported Places reforms consultation paper

Thank you for the opportunity to provide the attached feedback on the proposed legislative framework for implementing the expansion of demand-driven funding to approved sub-bachelor courses from 1 January 2018.

Accommodating sub-bachelor language programs

The University of Sydney would be very concerned if the proposed guidelines for the sub-bachelor CSP reforms had unintended consequences for existing university diploma of language courses offered by many Australian universities. Our longstanding [Diploma of language Studies](#) – and many other programs like it nationally – do not fit neatly into the standard linear or articulation pathway view of sub-bachelor degrees that appears to have informed the development of this policy. Students undertaking language diplomas in Australia typically enrol in the courses concurrently with a Bachelor degree and graduate with that Bachelor degree and the language Diploma. In some cases, they enrol in the Diploma after completing another higher education qualification.

These language programs are highly industry relevant. They are also delivering significant public benefits by addressing one of the most pressing skills shortages in our population and workforce. **We therefore seek assurances that universities with existing sub-bachelor language programs will be able to continue offering CSPs to students who are enrolled concurrently in a Bachelor or Combined degree once the proposed reforms are in place.**

We also believe that the national skills need for additional language expertise is sufficiently high to warrant sub-bachelor CSP funding for graduates seeking to enrol in such programs, and urge consideration of this further incentive for advanced language study. In support of this proposal, it should be noted that graduates can access CSP funding if they enrol in a second Bachelor degree, such as a Bachelor of Arts. This means that a graduate could access CSP funding for an entire Bachelor degree, of which the Diploma is a subcomponent, but not the for the subcomponent. In the interests of not encouraging over-qualification (completion of a full second Bachelor degree instead of a Diploma) and/or non-completion (enrolment in the Bachelor degree, and withdrawal after completion of the Diploma subcomponent), we think it makes more sense to offer CSP funding for the Diploma sub-component.

Providing clarity for prospective 2018 students

Due to the continuing uncertainty over the implementation of Government's reform proposals, we have put on hold our offer process for Semester 1 2018 sub-bachelor commencing CPS students. Noting it is the Department's current intention that the ministerial approval process for demand-driven CSP eligible courses in 2018 will be completed in early November 2017, **we urge the Department to confirm as-soon-as-possible its contingency plans in the event that the legislative uncertainty continues into late-October or beyond.**

Prospective 2018 commencing students for sub-bachelor courses have been basing their school and post-school study choices on course offerings and guidance materials that were finalised well before the reforms were announced. We are also very concerned that students will be substantially disadvantaged by such late and significant changes to preferred study options.

We therefore strongly support Universities Australia's call for the Government to confirm that even if the reform Bill passes this year, the start of its various elements will be delayed by one year. This approach would offer far greater certainty for students and be less disruptive to universities and other higher education providers.

Yours sincerely,

(Signature removed)

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Deputy Vice-Chancellor (Education)

Attachment University of Sydney feedback on the Australian Department of Education and Training's sub-bachelor CSP reform guideline proposals



Higher education reform: consultation paper for feedback, sub-bachelor courses, released by the Department of Education and Training, September 2017

29 September 2017

The University of Sydney's feedback on the consultation paper focuses on:

- i. the implications of these proposals for sub-bachelor language programs and future students of languages;
- ii. the feasibility of the proposed implementation timetable for 2018;
- iii. negative impact we predict the reforms will have on the critical non-university tertiary education sector, and on levels of collaboration between universities and non-university providers; and
- iv. matters of administration and process.

We make the following recommendations for consideration by the Department:

1. That the Department amend the proposed *industry skills needs* and *student eligibility* requirements to (i) ensure that sub-bachelor courses addressing an industry shortage in one or more foreign languages are eligible for CSPs, and (ii) allow students who have completed another higher education qualification to enrol in an approved sub-bachelor language course.
2. That the Department:
 - confirm its contingency plans for the implementation of the sub-bachelor CSP reforms as-soon-as-possible in the event that the reform Bill does not pass the Senate by the end of October 2017;
 - consider deferring implementation of the sub-bachelor CSP reforms by one year; and
 - allow universities with existing designated sub-bachelor CSP allocations to offer these as normal for commencement in Semester 1, 2018.
3. That the guidelines ensure that each course approved by the minister remains on the proposed approved list for a period of five years under normal circumstances before renewal of approval is required; and, to ensure appropriate planning timelines for students and providers, that any changes in approval are made at least 18 months prior to the date at which the change is to take effect.

(i) The implications for existing sub-bachelor language programs and their student cohorts

We seek the Department's urgent assurances that existing sub-bachelor language programs like our longstanding [Diploma of Language Studies](#) will remain eligible for Commonwealth-Supported Places (CSPs) once the reforms commence. We are very concerned that if applied strictly, the proposed eligibility criteria will result in some sub-bachelor language programs and/or some student cohorts who are enrolled in these programs currently, losing their eligibility for CSPs. To illustrate, for our Diploma of Language Studies, which we have offered for more than 20 years, admission requires that applicants:

- (a) are enrolled in an undergraduate degree, postgraduate or combined degree program at the University of Sydney; or
- (b) are enrolled in an undergraduate degree, postgraduate or combined degree program at another recognised tertiary institution; or
- (c) have been awarded, or be eligible for the award of, an undergraduate degree from a recognised tertiary institution.

We currently have 134 students enrolled in our Diploma of Language Studies. Of these, 78 were admitted under Category (a), with the remaining 56 students either admitted under categories (b) and (c) or have already completed part of their concurrent degree/s under (a) in a prior year. On our reading of the consultation paper's proposals, our Diploma of Languages would be eligible for ministerial approval. We are concerned, however, that without changes to the proposed guideline's eligibility criteria for students:

- all students currently admitted under our category (c) would in the future be ineligible for CSPs – due to already holding another higher education qualification;
- all Master-level students currently admitted to the Diploma under categories (a) and (b) would also be ineligible – as they would presumably already hold at least one Bachelor degree;
- some Bachelor degree students currently admitted under categories (a) and (b) could be ineligible (or become ineligible) for CSP support depending on when they commence and complete their Diploma and first Bachelor degree.

Our Diploma of Language Studies does not fully articulate into the University of Sydney Bachelor of Arts and produces graduates with skills in many languages that are in high demand from industry. In reality, however, the large majority of students who complete the Diploma will never use it for credit towards a Bachelor degree. They are studying the Diploma to supplement their higher degrees by adding skills and knowledge that they cannot include in their standard degrees.

Students enrolled in our Diploma of Language Studies concurrently with a bachelor, combined or master degree complete one major from a selection of 15 languages. However, most learn Mandarin, Japanese, Korean, Spanish, or French. Our Diploma of Languages students are drawn from the full spectrum of disciplines: science, engineering, law, music, medicine, agriculture, computer science, economics, teaching, environment etc. The Diploma program thereby helps to build national capacity in priority languages, while fostering strong connections between students in diverse disciplines. The funding and presence of the Diploma students in the School also helps to sustain the University's core academic capacity for foreign languages and cultures. We believe the picture will be similar for most other universities offering similar language programs.

The majority of our concurrently enrolled Diploma of Language Studies students complete the course part-time over three years, but it can be completed in 1.5 years in accelerated mode. Many of our students complete an exchange to a relevant country during their studies, further broadening and enriching their educational experience. We believe our Diploma of Language program delivers significant public benefits and improves the job-readiness of and attractiveness of our graduates, many of whom are destined for internationally engaged careers.

The educational and cognitive benefits of bilingualism are well recognised.¹ The Coalition Government's strong desire to increase levels of bilingualism and cultural understanding amongst the next generation of Australian leaders is clear from initiatives like the New Colombo Plan. Australia's heavy reliance on Asia for trade and investment is only expected to grow, and employers are increasingly seeking staff with foreign language skills. For example, according to one recent study growth in employer demand for bilingual graduates increased 181% between 2012 and 2015 – a growth rate second only to digital literacy skills.² Meanwhile, the 2016 census found that the number of monolingual English households in Australia grew 500,000 from 2011 to 2016, while levels of second language competency among Australia school leavers languishes at the bottom of the OECD.³

For these reason we query whether the Department may have overlooked the potential for unintended consequences for longstanding sub-bachelor language program arising from the design of these reforms? The scheme's design appears to contemplate only a standard linear pathway role for sub-bachelor courses in our higher education system. In reality sub-bachelor courses also play an important role in enabling students to obtain additional formal knowledge and skills alongside other tertiary-level studies, or to focus, diversify, or upgrade their skills and knowledge at different stages in their careers. This is no more apparent than in the area of language studies as outlined above.

As solutions for sub-bachelor language programs and student who study these courses concurrently with, or after completion of, another tertiary qualification, we propose that the eligibility criteria for demand-drive CSPs are amended as follows:

Industry skills need requirement

Add the following extra dot point:

- the course addresses an industry shortage in one or more foreign language.

Student eligibility

Amend the text as follows:

Students with prior higher education completions (~~except enabling courses~~) will not be eligible for Commonwealth supported places in sub-bachelor courses *unless (i) the course is an enabling course or (ii) the student is enrolling in an approved sub-bachelor language course.*

¹ <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3583091/>

² https://www.fya.org.au/wp-content/uploads/2016/04/The-New-Basics_Update_Web.pdf

³ <http://www.sbs.com.au/news/article/2017/06/27/census-2016-second-language-learning-australia-needs-urgent-attention>

(ii) Implementation timeframes

It is not realistic or fair for providers and prospective students for the Government to persist with its proposed 1 January 2018 start-date for this aspect of its reform package. Given the continuing uncertainty about the Senate's attitude to the reform Bill, and the absence of clear advice from the Department, we have already put on hold our application processes for Semester 1 2018 commencing students. We urge the Department to confirm – as-soon-as-possible – its contingency plans for the implementation of the sub-bachelor CSP reforms in the event that the legislative uncertainty continues into late October.

Prospective 2018 commencing students have been basing their school and post-school study choices on course offerings and guidance materials that were finalised well before the reforms were announced. We are also very concerned that students will be substantially disadvantaged by such late and significant changes to preferred study options. We therefore strongly support Universities Australia's call for the Government to confirm that even if reform Bill passes this year, the start of its various elements will be deferred by one year. This approach would offer far greater certainty for students and be less disruptive to universities and other higher education providers.

If implementation is deferred, we recommend that the Department advise universities with existing designated CSP allocations as-soon-as-possible that they will be able to offer them as normal for commencement in Semester 1, 2018. We believe that such an arrangement should be possible within the Commonwealth's CSP funding envelope. This approach would be much less disruptive for students and for universities and other higher education providers.

(iii) Negative impacts for the vocational education and training sector

We wish to place on the record our continuing concern that the Government's decision to restrict access to sub-bachelor demand-driven CSPs to Table A higher education providers risks substantial negative consequences for the coherence, quality and sustainability of the nation's non-university tertiary education sector.

Notwithstanding the recent challenges to quality evident in the vocational education sector arising from the combination of fee deregulation and lax regulation, the benefits (in terms of student choice, diversity, innovation, cost-containment, and collaboration between vocational education and university providers) of an appropriately regulated, but competitively neutral funding framework for the delivery of sub-bachelor courses, would be substantial.

Australia needs strong universities, but the nation also needs a strong, innovative and vibrant vocational education and training sector, with strong linkages and pathways with schools and higher education providers. Restricting demand-driven sub-bachelor CSPs to public universities is likely to create further distortions and inconsistencies in the fee and funding arrangements available to school-leavers in particular, but also for other student cohorts.

We predict that if implemented as proposed the reform will make it even more likely that students will choose to study sub-bachelor course offered by universities. We also predict that the proposed restrictions on sub-bachelor CSP eligibility will create a further disincentive for universities to collaborate with non-university providers to develop innovative articulation programs. If, however, the full-articulation requirement was maintained, but non-University tertiary providers could be eligible for sub-bachelor CSPs, this would establish a strong driver for collaboration.

For reasons such as these we question whether the Department, in recommending the proposed reform structure for sub-bachelor CSPs, has fully thought through the implications for the tertiary education sector. Here we note that a full regulatory impact statement does not appear to have been completed for this and other aspects of the reform package. We also note that the approach proposed for sub-bachelor CSPs is inconsistent with that proposed for the postgraduate CSP scholarship scheme, and with the version of the similar policy for sub-bachelor courses that the Government included in its 2014 Higher Education Reform Package.

(iv) Matters of administration and process

We strongly support the proposal for providers to give the Department forward estimates of student load each year, and for there to be two fixed dates each year for the submission of new courses for approval.

However, we believe that once a course is approved, it should remain on the approved list for a period of five years under normal circumstances. While the requirements of the form are not onerous, we are concerned that requiring ministerial approval to be renewed for each course annually would introduce an element of potential uncertainty that would not be helpful for providers or students in terms of their planning.

To ensure appropriate planning timelines for students and providers, we also recommend that any changes in approval are made at least 18 months prior to the date at which the change is to take effect.