

13/10/2017

ATTN: Dr Andrew Herd
Funding Policy and Legislation Branch
Higher Education Group
Department of Education and Training
GPO Box 9880
Canberra ACT 2601

Dear Dr Herd,

The Australian Technology Network of Universities (ATN) would like to thank you for the opportunity to comment on the Sub-bachelor courses – implementation discussion paper.

The ATN is a national collaborative group of five major universities including QUT, University of Technology Sydney, RMIT University, University of South Australia and Curtin University.

The ATN firmly believes that a sustainable, accessible, quality education system and the innovation agenda are core to Australia's long-term prosperity and societal wellbeing.

Collaboration has always been important for the ATN and its members, and students are at the heart of everything we do. ATN universities all have genuine links to industry as an inherent part of both our teaching and research. We are committed to developing work-ready graduates by connecting them to world leading innovators and thinkers. We believe that it is vital that we equip graduates with employability skills that industry require to ensure they can adapt to the new jobs of the future. Partnerships with industry provide our students with the opportunities to gain practical knowledge and experience in their areas of study. Our graduates lead changes in society, provide innovative solutions to global problems and are equipped with the skills to enter the modern workforce.

The ATN is pleased that the Government is proposing the demand driven system be extended to include sub-bachelor places, effectively expanding higher education to a new cohort of students. Expanding the sub-bachelor program into the demand driven system provides potential students with increased choice. Additional pathways into a bachelor degree will mean that students are more familiar with the higher education sector than if they had entered directly into a bachelor degree. Moreover, students who study at the sub-bachelor level, compared to those who enter the labour market directly from high school, should have improved employability outcomes. They should also have greater confidence in their abilities when progressing into bachelor programs which should, in turn, improve retention. ATN universities have long advocated for the need to increase accessibility and pathways into university studies based on the students' needs, and are supportive of this measure.

The ATN particularly welcome the requirement to ensure that the courses respond to industry needs, guaranteeing that universities continue to deliver the highly skilled graduates required by our transforming economy. This change presents an exciting opportunity to both prepare

8/1 GEILS COURT
DEAKIN ACT 2600

+61 2 5105 6740
INFO@ATN.EDU.AU
WWW.ATN.EDU.AU
TWITTER @ATNUNIS

BUILDING PARTNERSHIPS. FINDING SOLUTIONS.

graduates for further higher education study and improve their chances of completion, as well as deliver Australia with the skilled workforce it needs to tackle the changing nature of work.

The manufacturing sector is a perfect example of this. We are now entering into the fourth industrial revolution, known as Industry 4.0. Industry 4.0 has already markedly changed manufacturing and is poised to significantly transform manufacturing globally within the next decade. In this century, manufacturing workers will need very different skills and specialist capabilities than someone working in manufacturing in the past. It is expected that Industry 4.0 competencies will extend to digital and data programming and analysis skills, project coordination (including logistics and supply chain skills) and increased generic skills which include creative design, innovation and leadership skills.

As Australia shifts from being a traditional manufacturing sector towards embracing Industry 4.0, skills such as 3D printing, additive manufacturing, and digital design will become increasingly sought after by industry. Universities will work with the Prime Minister's Industry 4.0 Taskforce to ensure that we create a cohort of trained graduates to lift Australian manufacturing to be a world leader in Industry 4.0.

There would be exit paths for graduates to work in industry, but there would also be the possibility of students using their sub-bachelor qualification to articulate into a Bachelors program. This approach would be similar to the approach taken in Germany to train people for a career in Industry 4.0. The qualification could be gained within two years which would suit both industry timelines and also be potentially more attractive to someone who needs to re-skill or up-skill from previous experience in the manufacturing sector due to the unfortunate loss of jobs in more traditional manufacturing.

Criteria for course and student eligibility

The ATN are concerned about the proposed restriction of students who hold an existing higher education qualification from being eligible to re-skill or up-skill through the use of a demand driven sub-bachelor qualification. While mindful of the fact that there may be concerns that the system is not vulnerable to rorting, the changing nature of work will require constant skills development and training. It is important to also note that this restriction could have perverse impacts. For example, a student who undertakes a Diploma at an institute would be excluded from studying an associate degree at the same institution. The ATN recommends including another clause to stipulate "except where there is a defined progression within a nested suite of programs."

As outlined above sub-bachelor courses can provide the skills and development for a dynamic and responsive workforce. More broadly, the proposed restriction to limit sub-bachelors places to people who have never previously engaged in higher education study will have significant impacts on existing students. For example, students who have qualifications in all fields often take sub-bachelor courses to improve their employability through increasing their transferrable career skills. A more agile policy mechanism, that will respond to the changing and rapid development of Australian industry might be to instigate a time based restriction, i.e. students who have completed another higher education qualification in the last X years will be restricted, rather than an outright restriction on anyone with a higher education

8/1 GEILS COURT
DEAKIN ACT 2600

+61 2 5105 6740
INFO@ATN.EDU.AU
WWW.ATN.EDU.AU
TWITTER @ATNUNIS

BUILDING PARTNERSHIPS. FINDING SOLUTIONS.

completion. This mechanism remains consistent with the intention of the policy, but allows the Australian worker ample opportunity to re-or up-skill as the economy demands.

The ATN support the principle of articulation from sub-bachelor courses to Bachelor courses as this enables prospective students to ensure they are ready for the rigor of Bachelor study. Despite our support, the ATN have concerns about the requirement for full articulation.

For example, the Australian Qualifications Framework recognises that not all sub-bachelor courses can be fully credited into a Bachelor degree as sub-bachelor courses are not simply sub-sections of Bachelor degrees – they must have an independent academic structure that can result in less than full articulation to a higher award.

Credit agreements negotiated between issuing organisations for credit for students towards higher level AQF qualifications in the same or a related discipline, ..., should use the following as the basis of negotiations:

- 50% credit for an Advanced Diploma or Associate Degree linked to a 3 year Bachelor Degree
- 37.5% credit for an Advanced Diploma or Associate Degree linked to a 4 year Bachelor Degree
- 33% credit for a Diploma linked to a 3 year Bachelor Degree
- 25% credit for a Diploma linked to a 4 year Bachelor Degree¹.

While many universities, including ATN universities do offer sub-bachelor courses that do offer full articulation into Bachelor degrees, there are just as many sub-bachelor courses that are not recognised for full articulation. It is not uncommon for a two year associate degree to require three years of Bachelor level study (as opposed to four years). This is a reflection of the specialised focus of sub-bachelor courses which provide opportunities for students to prepare themselves for labour market or further study. For example, a student who is commencing a sub-bachelor qualification to articulate into STEM fields may require additional focus on senior school mathematics, content that is not part of a Bachelor degree. While sub-bachelor degrees should offer this content, it is not reasonable to expect these courses to be recognised as equivalent to Bachelor level courses. Furthermore, with sub-bachelor course often having an active pathway to employment built into the course's pedagogy, these course significantly differ from the early year's content of a Bachelor's course. While sub-bachelor courses should provide clearly articulated pathways to Bachelor courses, the requirement for full articulation would not be appropriate given the difference in focus between the two.

Additionally, the ATN are concerned that the proposed articulation requirements will have unintended consequences for existing university diploma of language courses offered by many Australian universities. Longstanding Diploma of Language Studies, and many other programs like it, do not fit neatly into the standard linear or articulation pathway view of sub-bachelor degrees. Students undertaking language diplomas in Australia typically enrol 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 relevant to industry. They are also delivering significant

8/1 GEILS COURT
DEAKIN ACT 2600

+61 2 5105 6740
INFO@ATN.EDU.AU
WWW.ATN.EDU.AU
TWITTER @ATNUNIS

¹ https://www.aqf.edu.au/sites/aqf/files/aqf_pathways_jan2013.pdf

public benefits by addressing one of the most pressing skills shortages in our population and workforce. The ATN therefore seek assurances that universities with existing sub-bachelor language programs will be able to continue offering Commonwealth Supported Places to students who are enrolled concurrently in a Bachelor or combined degree once the proposed reforms are in place.

The ATN also questions the term of “excellent employment outcomes” especially in relation to emerging industries or occupations and local and regional skills shortages. While these are worthy aims, and appear to be sensible in principle, there needs to be further definition of the terms and clarification about how these will operate in practice. The experience of defining employment outcomes in the VET Student Loans has faced difficulties in being transparent and has not been consistent between disciplines. Furthermore, with the rapidly changing nature of the employment market, what is defined as excellent employment outcomes? The ATN looks forward to further consultation with the Department of Education and Training in developing this definition.

Additionally, the ATN is seeking further clarification from the Department of Education and Training about how occupations will be identified as those from emerging industries and which courses will be addressing regional skill shortages. Will the Department of Education and Training utilise state-based skills shortage lists? Even using such a widely published list has problems. For example, occupations fluctuate on and off various state based skills shortages lists in a much shorter timeframe than it takes for a university to deliver a sub-bachelor course. Therefore, it would be important that students cohorts are grandfathered lest funding be removed part-way through a student’s study.

Finally, the ATN seeks clarification from the Department of Education and Training that students who are undertaking concurrent courses at a Bachelor and sub-bachelor level will be eligible for funding and not excluded from obtaining a Commonwealth Supported Place in a sub-bachelor course.

Process for course approval

The ATN welcomes the specified application periods for course approval. We would also urge that a reasonable timeframe be set for determination of submissions as student application processes have lengthy lead times. The ATN also proposes that sub-bachelor courses in development be eligible for submission to ensure that internal and external approval processes can be aligned.

The ATN welcomes the intent of the flexible and straightforward application template

Timing

The timeframes proposed, with implementation for Semester One 2018 are of concern for university operations. The proposed timeline for 2018 is too late for implementation in the first half of 2018. Courses are already open for application with many prospective students having already submitted their preferences for 2018 study. Thus, the ATN recommends that the Department of Education and Training consider delaying the implementation of the sub-bachelor changes to commence for Semester Two 2018. This would allow additional time to

8/1 GEILS COURT
DEAKIN ACT 2600

+61 2 5105 6740
INFO@ATN.EDU.AU
WWW.ATN.EDU.AU
TWITTER @ATNUNIS

BUILDING PARTNERSHIPS. FINDING SOLUTIONS.

ensure that sub-bachelor courses have the required pedagogy to meet the requirements of the new demand driven sub-bachelor system. Furthermore, this would allow universities adequate time to ensure that prospective students are properly informed before commencing their studies.

Post-implementation monitoring arrangements

The ATN understands and supports post-implementation monitoring measures. We recognise the importance of ensuring that public money is spent appropriately and that sub-bachelor demand driven system is meeting the desired policy outcomes. To that end, the ATN would support an independent post-implementation review. This review could present an evidence base for further policy refinement along with highlighting possible synergies that exist across the tertiary education sector.

The ATN urges the Department of Education and Training to monitor sub-bachelor enrolments in the same context of bachelor enrolment growth in the demand driven system, noting that a demand driven system is more responsive to student and industry need than a centralised allocation of places.

Please do not hesitate to contact the ATN Directorate on (02) 5105 6740 or via e-mail at renee.hindmarsh@atn.edu.au to discuss any elements of the submission further.

Yours sincerely,



Renee Hindmarsh
ATN Executive Director

8/1 GEILS COURT
DEAKIN ACT 2600

+61 2 5105 6740
INFO@ATN.EDU.AU
WWW.ATN.EDU.AU
TWITTER @ATNUNIS

BUILDING PARTNERSHIPS. FINDING SOLUTIONS.