



Queensland University of Technology

Response to Consultation Paper on the reallocation of Commonwealth supported places for enabling, sub-bachelor and postgraduate places

1. QUT Context

Enabling and sub-bachelor places

QUT currently does not have any enabling or sub-bachelor places allocated through the 2018-2020 Commonwealth Funding Agreement, although the QUT International College (QUTIC) currently offers sub-bachelor coursework to international students. Recent research has confirmed that there is market demand for QUT to move into delivery of domestic sub-bachelor and/or enabling coursework, and QUT is well positioned to provide those offerings at high quality with high expectation of student satisfaction and progression.

Postgraduate coursework place

The current QUT postgraduate CSP courses include:

- DE80: Master of Architecture
- ED38: Graduate Diploma Education (teach out only)
- ED79: Master of Education
- EU30: Master of Teaching (Early Childhood)
- EU40: Master of Teaching (Primary)
- EU50: Master of Teaching (Secondary)
- EU60: Graduate Certificate Education
- CS60: Graduate Diploma Medical Ultrasound
- NS32: Graduate Certificate Nursing
- NS87: Master of Nurse Practitioner
- OP85: Master of Optometry
- PU65: Graduate Diploma Occupational Health and Safety
- PU67: Graduate Diploma Environmental Health
- PY18: Master of Clinical Psychology
- PY19: Master Psychology (Education & Development)
- PY50: Doctor of Psychology (Clinical)
- SW81: Master of Social Work – Qualifying
- PH80: Master of Applied Science

In order to fulfil its obligations to the professions and the communities they serve, QUT has been meeting high market demand for postgraduate coursework in these areas in numbers well above the CSP allocation in most cases.

In 2018 QUT's Funding Agreement stripped out 57 EFTSL relative to the previous year, including 40 EFTSL in Master of Optometry (the other 17 were 5 EFTSL in Graduate Diploma Medical Ultrasound and 12 EFTSL in Master of Psychology). QUT's postgraduate Optometry course meets all of the government's criteria for support. QUT is the only university in Queensland, and one of only a few in Australia, which offers postgraduate Optometry training. It is not possible for a student to graduate with sufficient training to gain professional qualifications without completing the postgraduate component. This arbitrary reduction could have an immediate and detrimental effect on the supply of qualified optometrists.

In 2018 QUT forewent approximately \$1.878 million in notional Commonwealth Grant revenue to host these enrolments at numbers above those funded through the agreement. As these enrolments show, there is very clear market demand for funded places well above our current allocation in most instances, including in courses required for entry to practice, where allocations below professional need and student demand impacts negatively on the supply of professionals required to meet community need. Provision to low SES and other equity students also militates against fee-charging, as these cohorts overwhelmingly lack the financial liquidity to pay fees as well as bear the opportunity cost of time studying. CSPs are therefore essential to provide opportunity to equity groups.

Funding Cluster Description	2018 Funding Agreement	2018 Estimated EFTSL	Maximum Commonwealth Grant Amount	Commonwealth Grant Amount with no maximum	Commonwealth Grant Amount above maximum (unfunded)
1 - Law, Accounting, Administration, Economics, Commerce		0.6	\$0	\$1,193	-\$1,193
3 - Mathematics, Statistics, Behavioural Sc, Social Studies, Computing, Built Environment, Other Health	190	236.9	\$2,046,135	\$2,471,080	-\$424,945
4 - Education	590	723.0	\$6,597,244	\$7,848,165	-\$1,250,921
5 - Clinical Psychology, Allied Health, Foreign Languages, Visual and Performing arts	148	165.0	\$1,916,236	\$2,116,950	-\$200,714
6 - Nursing	105	87.5	\$1,253,350	\$1,253,350	\$0
7 - Engineering, Science, Surveying	10	9.0	\$164,160	\$164,160	\$0
Grand Total	1044	1,221.9	\$11,977,126	\$13,854,898	-\$1,877,772

Table 1: 2018 Estimated EFTSL and Revenue from PG CSP courses by funding cluster

For 2019, the estimated foregone Commonwealth Grant revenue has more than doubled to \$3.9 million over last year as postgraduate EFTSL grows, particularly with the pipeline of a new two-year Master of Education (see 2.1 below):

Funding Cluster Description	2019 Funding Agreement	2019 Estimated EFTSL	Maximum Commonwealth Grant Amount	Commonwealth Grant Amount with no maximum	Commonwealth Grant Amount above maximum (unfunded)
1 - Law, Accounting, Administration, Economics, Commerce		0.5	\$ -	\$ 1,130	-\$1,130
3 - Mathematics, Statistics, Behavioural Sc, Social Studies, Computing, Built Environment, Other Health	190	222.4	\$ 2,019,700	\$ 2,363,996	-\$344,296
4 - Education	590	844.4	\$ 6,530,304	\$ 9,340,097	-\$2,809,793
5 - Clinical Psychology, Allied Health, Foreign Languages, Visual and Performing arts	148	181.4	\$ 1,934,804	\$ 2,371,603	-\$436,799
6 - Nursing	105	126.9	\$ 1,547,176	\$ 1,852,048	-\$304,872
7 - Engineering, Science, Surveying	10	12.4	\$ 185,860	\$ 229,623	-\$43,763
Grand Total	1044	1,388.0	\$ 12,217,844	\$ 16,158,497	-\$3,940,653

Table 2: 2019 Estimated EFTSL and Revenue from PG CSP courses by funding cluster

2. Feedback to Consultation Issues

2.1. Principles for allocation of places

The guiding principles of any formal Commonwealth allocation process should encompass the themes of **transparency, fairness, ease of implementation and governance, and timeliness**. Universities must be able to respond to market demands quickly. Any process by which additional places are allocated must be: proactive; easily, consistently and fairly assessed; and quickly administered.

For consistency and to enable institutions to address new and rising demand, these processes must include mechanisms allowing universities to request new places where none were previously allocated. This adheres to the same underlying principle as the reallocation of underutilised places: that is, privileging present and future market demand over legacy patterns of historical allocation. If the redistribution of places to smooth out over- and under-

utilisation is justified, so then must be the allocation of places where when the legacy case is zero, in the presence of plausible student demand.

Commitments should also accommodate changes in state or national accreditation requirements that have compelled course restructures resulting in extension of EFTSL numerically for the completion of the same course. For example, recent compulsory changes in Queensland to Master of Education courses has required the course to expand from 18 months to 24 months, producing a 33% increase in EFTSL to graduate the same number of individuals. However the allocation of postgraduate education places in EFTSL has not kept pace with the additional six months of study incumbent upon each student.

Additionally, international practice demands continue to change: we are required to restructure our Master of Architecture program, for instance, to ensure our graduate remain globally competitive, but persistent under-allocation against demand makes it harder to address this genuine market need.

2.2. Process and implementation

Frequency

QUT can see merit in an annual allocation process informed by April and September HEIMS submissions of estimates through the HEIMS system. This approach would be responsive to emerging market demands and supports real time consideration of program growth. A more frequent review and allocation process would need to be balanced by any administration overheads. However, alternatives, such as a multi-year allocation provides more planning certainty but will need to take into account the growth or contraction of demand in a timely manner.

Reallocation options

QUT does not support the proposed five per cent reduction in commencing places across all funding clusters. It privileges administrative ease over the logic of provision in the field, as its effects will be felt not at all by universities under-enrolling by more places than they surrender, and will adversely affect universities that are filling or exceeding their current allocations. In the case of universities exceeding their allocations in order to meet genuine student need, a five per cent reduction will even further limit their ability to meet market demand.

Instead, QUT recommends that unused places be re-allocated to universities that have exceeded existing allocations or who confront structural challenges such as our Master of Education, where our existing under-allocation now falls even shorter of meeting demonstrable market need since statutory requirements compelled a course restructure. This approach will favour improved market responsiveness across the sector, and will self-regulate over time. As indicated in the consultation paper, there are many universities that have been unable to fill allocated places, particularly in the postgraduate cohort. Reducing the allocated places at the under-enrolled universities, particularly those which consistently have been under-enrolled for several years, and reallocating those places to universities exceeding their allocations would better meet market conditions. This approach would better reflect program demand and student preferences and support re-allocation to ensure efficient use of Australian Government CSP allocated places.

In addition, QUT does not support the allocation of places to individual students in any kind of voucher or scholarship model.

2.3. Consultation issues – enabling places

QUT currently does not offer Commonwealth Supported enabling places. The University does offer limited fee-based university preparatory courses, primarily in Maths, which serve a similar purpose, and has also subsidised limited places for the Cert IV in Adult Tertiary Prep through TAFE. The University is considering entering the market and would encourage any process to include mechanisms to bid for future places.

Consultation and issues for feedback	QUT Response
<p>Student Progression to further study at tertiary level</p> <ul style="list-style-type: none"> The existing student data collection could be used to examine the proportion of students enrolled in an enabling course one year who progress to a tertiary level program the next year. 	<ul style="list-style-type: none"> Problematic as data would always be at least one year old. It would not capture current progression or reflect any improvements that may impact future allocations. It also suggests that progression to tertiary level study is the only indicator of success. Students may decide to undertake study to improve workplace marketability or differentiate themselves from peers in a competitive job market. Completion of the enabling course is a better indicator.
<p>Existing utilisation of places</p> <ul style="list-style-type: none"> Could be measured by historical over and under enrolment, comparing allocations with actual use Significant over-enrolments at an institution may indicate that there is strong demand How to avoid creating an incentive to fill places with uncommitted students to maintain allocation of places 	<ul style="list-style-type: none"> This method seems the most equitable and easy to implement and govern. Mechanism should allow universities to request new places where places were not previously allocated. If incentives were likely to arise they would already exist in the system, but current patterns of under-enrolment seem to suggest they either do not exist or are weaker than countervailing imperatives, such as avoiding reputational risk from poorly motivated students (as motivation correlates strongly with performance).
<p>Profile of commencing students</p> <ul style="list-style-type: none"> Consider the characteristics of an institution's commencing student cohort. Providers would be required to demonstrate how they would engage with and support students from disadvantaged groups. Places would be allocated to institutions most able to assist these students. Consider the institution's catchment area 	<ul style="list-style-type: none"> How would these characteristics be assessed and weighted in determining allocation of places? Are all characteristics equal? How is "ability to assist" measured? How is the catchment determined? In capital cities institutions are usually competing against multiple institutions. Growth of on-line learning may make catchment areas difficult to define.
<p>Innovative teaching models Development of innovative approaches to course delivery</p>	<ul style="list-style-type: none"> How would this criterion be evaluated? By whom would it be evaluated?
<p>Uneven distribution of enabling places It will also be important to ensure that criteria do not effectively lock out institutions with no, or very small current allocations and there may be value in considering whether all institutions should be entitled to a minimum number of places.</p>	<ul style="list-style-type: none"> QUT endorses this approach.

2.4. Consultation issues – sub-bachelor places

QUT does not currently offer Commonwealth Supported sub-bachelor courses, but we would consider moving into delivering an allocation of sub-bachelor places should policy settings permit. Contemporary market analysis indicates that there is a need in the market, and that such an offering would provide value for students and the community. QUT also has a strong international pathways program delivered through QUT International College (QUTIC). QUTIC offers several diploma level pathway courses that could be adapted to a domestic market if sub-bachelor CSP places were approved. This represents an underutilised existing resource that could be delivered to domestic students with great efficiency. Given QUT's strong track record in delivery of international pathways programs, and the high quality of the educational experience we offer domestic students in our bachelor programs,

QUT is very well placed to effectively deliver programs at the sub-bachelor level for CSP allocated places, and to improving access and equity.

Government investment in CSP sub-bachelor places should be responsive to current and emerging need, as well as to the quality of provision, and not bound by historical decisions that were taken in light of conditions and imperatives that are no longer in play. The allocation of places should be about the present and the future, not the past.

We advance three key considerations to inform the Australian Government’s allocation of CSP places at the sub-bachelor level:

- **Industry and economic need** – including alignment of places with skill shortages and industry requirements, emerging occupational growth areas in the local economy and supporting industry relevant learning and teaching practices in CSP support places.
- **Community needs** – with explicit consideration of how the investment in sub-bachelor places will address educational needs in the local community.
- **Student needs** – ensuring allocated places meet demonstrated student demand and provide an appropriate and demonstrated high quality pathway for the individual student through a responsive system.

These are outlined in further detail in the table below, with reference to the consultation and issues for feedback raised in the Consultation Paper.

Consultation and issues for feedback	QUT Response
<p>Courses address industry needs Preferences could be given to courses that address needs through one or more of the following:</p> <ul style="list-style-type: none"> • The course or the related bachelor degree into which it articulate is accredited by the appropriate professional body or association; • The course was developed in consultation with industry; • The course includes substantial work integrated learning or work experience in industry; • The course has demonstrated excellent employment outcomes; • The course related to emerging industries or occupations; • The course address local or regional skills shortages; and • The course does not duplicate courses being funded by the VET sector 	<p>Alignment to industry and economic need is important to ensure government investment in sub-bachelor programs is effectively targeted and supports strong outcomes for students and industry.</p> <p>QUT has a strong commitment to delivering outstanding real-world education through innovative courses that lead to excellent outcomes for graduates. This is underpinned by teaching practices that support real world graduates, including through strong connection to industry and practicing professionals, work integrated learning practices and involvement of industry in course development. QUT’s approach actively takes account of these factors and believe they are critical for effective delivery of CSP funded sub-bachelor programs.</p> <p>Allocation of CSP places should:</p> <ul style="list-style-type: none"> • Prioritise CSP allocations to sub-bachelor (pathway) programs that articulate into bachelor programs in vocational fields – with this representing better value for money for government through improved employment prospects • Prioritise sub-bachelor programs that address regional workforce shortages in the local area – with provision for special allocation based on local place-based needs • Provide CSP places to universities with a track-record of delivering effective employment outcomes (through both sub-bachelor and bachelor programs). <p>To best meet industry and economic needs, QUT also believes that CSP-funded sub-bachelor courses should not replicate existing VET programs. These VET programs may provide preferable educational alternatives for some students. Providers applying for CSP sub-bachelor places should actively outline how their program provides an alternative to offerings than currently exists in the VET system (including target cohort and program content). In particular, this should be a key consideration for the allocation of CSP places to new programs.</p>

Consultation and issues for feedback	QUT Response
<p>Existing utilisation of places</p> <ul style="list-style-type: none"> • Could be measured by historical over and under enrolment, comparing allocations with actual use • Significant over-enrolments at an institution may indicate that there is strong demand • How to avoid creating an incentive to fill places with uncommitted students to maintain allocation of places 	<p>QUT supports using the existing utilisation of places to determine where CSP places are re-allocated at the sub-bachelor level, with places re-directed to programs which have previously over-enrolled. On the whole, this approach appears to be equitable and easy to implement and provides a clear indication of student and professional needs.</p> <p>Universities exceeding their CSP allocation indicates high market demand for course offerings. By contrast, under-enrolment represents an inefficiency in the system and entails an opportunity cost with funding languishing unused in one location while demand elsewhere remains unmet.</p> <p>At the same time, this is not the only legitimate consideration for CSP allocation at sub-bachelor level: other factors, such as industry alignment, community needs and previous institutional performance should also be taken into account.</p>
<p>Completions and transition to further study at tertiary level</p>	<p>Articulation to bachelor study is a key objective of CSP sub-bachelor allocation, so the Government should allocate sub-bachelor places to programs that provide a clear articulation pathway to bachelor level study. This not only satisfies a public policy objective but also favours student opportunity and achievement.</p> <p>QUT has been committed to raising entry scores for students studying at the university. Analysis has indicated that low-ATAR university students with a sub-bachelor or vocational qualification have better prospects of completing their bachelor degree subsequently.¹ Attrition rates across the sector are also higher for students with lower ATAR's across the sector². Supporting participation in Diploma programs for student cohorts who are at greater risk of non-completion is likely to result in improved retention of students in bachelor level study and better longer-term academic and employment outcomes. This best supports community needs (for targeted cohorts) and needs of students more generally.</p> <p>QUT also believes the system would benefit from increased government investment into higher quality pathway programs. Under this model, rather than lowering entry standards to the Higher Education system overall (and replicating existing VET programs in some instances), high quality pathway programs could provide preparatory support to ensure students are well-prepared for a high-quality university education. This would support both industry and economic needs with better prepared graduates and also support student needs through more tailored first year support. It should be noted that sub-bachelor programs can provide a distinct pathway from enabling programs, and sub-bachelor programs should also not duplicate enabling programs that are available as allocated CSP places. Enabling programs should focus building numeracy and literacy skills to support participation in further education, whereas sub-bachelor programs should focus on supporting more academically prepared students into bachelor level qualifications.</p>
<p>Attrition</p>	<p>The use of institutional retention/attrition rates is theoretically reasonable, but its effectiveness as a means of allocating places is subject to several caveats on method. In particular, it should be carefully controlled for other variables that may be independent of institutional performance (in particular, school cohort achievement,</p>

¹ Grattan Institute (2018) 'University admission: ATAR best guide to student performance'.

² Daniel Edwards and Julie McMillan (2015) "Completing university in a growing sector: Is equity and issue?", Australian Council for Education Research

Consultation and issues for feedback	QUT Response
	<p>first in family, low SES, sole householder earner and other characteristics that significantly increase the degree of difficulty significantly increase attrition risks).</p> <p>This aspect is rendered less problematic if policy explicitly states that inferences about institutional performance are neither sustainable nor necessary: cases of persistent high attrition may indicate a poor match for student need, quite independent of the quality of provision or other institutional performance considerations, yet sufficient to initiate a process to reallocate places.</p> <p>QUT has been committed to improving its performance on student retention and has demonstrated strong performance in this area.</p>
<p>Demonstrated demand</p> <ul style="list-style-type: none"> Local population growth Youth population 	<p>QUT notes that demonstrated demand can be shown by enrolment over the allocated number of places. QUT would also outline that factors related to population growth in the local catchment area (and more particularly growth in the youth population) can indicate latent unmet market demand and is an important consideration in identifying future community needs.</p> <p>These factors should be considered in the allocation of CSP sub-bachelor places to universities if a long-term allocation approach is adopted. These factors should also be considered in relation to new market entrants (i.e. those without existing CSP allocations), in order to demonstrate community demand for programs at this level.</p>
<p>Demonstrated need</p> <ul style="list-style-type: none"> Current post-secondary provision in region relative to national average 	<p>'Demonstrated need' is a factor across three key considerations:</p> <ol style="list-style-type: none"> Industry and economic need – including taking account of industry and workforce requirements (as outlined earlier in relation to 'Courses to address industry need'). Community needs – with explicit consideration of how the investment in sub-bachelor places will support students that require additional and more tailored academic support to successfully attend university in communities where educational achievement may be lower. Student needs – the need for appropriate pathways for the individual student with responsiveness to demand from students to study at particular universities or in particular programs (as outlined in 'Existing Utilisation of Places').
<p>Demonstrate performance</p> <p>Consideration could be given to developing a process whereby all universities, including those without an existing allocation, can seek to request further places based on their proposed approach.</p>	<p>QUT proposes the following criteria:</p> <ul style="list-style-type: none"> Demonstrated demand for programs – including demonstrated local skills requirements, population growth and/or clear indication of the need for sub-bachelor programs in the region. Strong institutional performance – including through demonstrated performance of supporting student progression and outcomes, through measures such as retention and attrition rates, graduate satisfaction and employment outcomes for bachelor level study. Performance in similar offerings at the bachelor level would be an excellent guide to the likely quality of provision at the sub-bachelor level for new entrants. Viable institutional arrangements to deliver pathway programs – with clear articulation for the mechanism for delivering CSP sub-bachelor places and indication of

Consultation and issues for feedback	QUT Response
	performance delivering pathway programs (international or fee paying domestic).

2.5. Consultation issues – postgraduate places

As noted above, QUT currently has a funding agreement for 1,044 postgraduate CSP EFTSL in 2018 against a total postgraduate coursework enrolment of 1,222 EFTSL. Since the inception of demand driven funding and postgraduate funding agreements, QUT has consistently exceeded the Commonwealth allocated places due to persistent strong demand. This market need continues to grow, particularly in the education and health disciplines. In addition to the growth of market demand, the allocation of postgraduate education places has not kept pace with the mandated shift to a minimum of two-year postgraduate education coursework. This externally imposed statutory requirement has resulted in QUT exceeding the allocated education places.

As the paper notes, the absence of clear guidelines to help assess whether a course meets the interim criteria have made them very difficult to implement in practice with rigour and confidence. These are unsatisfactory conditions for an ongoing public funding regime, as they favour the development of an impression of ad hoc and arbitrary elements to determinations. The criteria should be closely researched and carefully expanded to add much-needed clarification and specificity.

Feedback is provided against the following criteria for the reallocation of postgraduate places:

Consultation and issues for feedback	QUT Response
<p>Which courses are subsidised Preference could be given to courses that address one or more of the following:</p> <ul style="list-style-type: none"> • Delivers significant community benefit and where graduate salaries may be comparatively lower while demand for skills is high • Qualification is a minimum requirement for professional registration/accreditation or the minimum qualification legally required for practice in a profession • Shortest possible pathway to a professional qualification • Meets an identified skills shortage 	<p>QUT has several courses which meet this criterion for which we have been allocated places, including the Master of Architecture and the Master of Optometry. Despite unambiguously meeting these criteria, however – including being the only provider at this level in Queensland and one of only a very few nationally – QUT’s allocation of Master of Optometry was recently reduced by 40 places. This action in opposition to the government’s own guidelines has put at risk the on-going operation of both the undergraduate and postgraduate offering.</p>
<p>Existing utilisation of places</p> <ul style="list-style-type: none"> • Could be measured by historical over and under enrolment, comparing allocations with actual use • Significant over-enrolments at an institution may indicate that there is strong demand • How to avoid creating an incentive to fill places with uncommitted students to maintain allocation of places 	<p>This method seems the most equitable and easy to implement and govern. QUT has consistently exceeded its postgraduate Funding Agreement, indicating responsible management of allocated places and market demand for QUT course offerings. The magnitude of under-enrolment in the sector suggests that there is little incentive to fill places with uncommitted students. Data reporting student progress, completions or attrition could be used to monitor/respond to Department concerns.</p>

Consultation and issues for feedback	QUT Response
<p>Student satisfaction</p> <ul style="list-style-type: none"> As measured and reported through current processes Provide some weight to the quality of teaching and learning in consideration of the allocation of places 	<p>QUT would welcome more information on how this measure would be used.</p> <p>For the Student Experience Survey (SES) there is currently only one year of data (2017) for postgraduate students, meaning that there is insufficient data to determine trends.</p> <p>Which scale in the SES would be used for student satisfaction i.e. Overall Educational Experience, or some other scale?</p> <p>While QUT has a good response rate for the SES, the SES uses a self-selecting sample of students and does not survey the full student population.</p>
<p>Graduate employment outcomes</p> <ul style="list-style-type: none"> Consideration to be given to range of external factors which influence graduate employment Employment outcomes are a key underlying rationale for government investment in PG education Consideration in the allocation of places and the likelihood that many PG students are already employed, many in industries relevant to their qualifications 	<p>Many institutions do not have a high response rate for the Graduate Outcomes Survey (GOS), another self-selecting instrument. Response rates will need to be a consideration when determining at what level the graduate outcomes might be applied e.g. whole of institution / field of education / course. The very low number of responses for some postgraduate courses would affect the validity of data from these surveys.</p> <p>As acknowledged in the Consultation Paper, many postgraduate students are employed while undertaking study. In many cases, full-time employment outcomes following graduation are likely to be unrelated to the completed postgraduate course. If students are employed full-time before or during their course and then employed full-time after graduation, full-time employment would not be a distinguishing outcome of the course.</p> <p>If salaries are to be considered as graduate employment outcomes for postgraduate courses, how would this be balanced against salaries prior to graduation for students who were already working? How would salaries for graduates from different courses (e.g. teaching and optometry) be meaningfully compared?</p> <p>A potentially more meaningful future measure could be the relevance of a postgraduate course to employment outcomes, however this data is not readily captured by the GOS and would require significant work by universities and the Department to implement.</p>
<p>Transitional arrangements</p> <p>It is proposed that any reallocation of places will be with respect to commencing places only</p>	<p>Currently enrolled students should certainly be 'grandfathered'. Mid-stream policy change that disadvantages individuals is both unfair and may contribute to attrition.</p> <p>However if reallocation across the system utilises only unallocated places from under-enrolling institutions this is not a risk, as no actual students will be disadvantaged by having their CSP taken away, as is the case for the 5% redistribution scenario proposed in the paper.</p>

3. Response to summary of issues/questions

Issue	QUT Response
<p>Should geographical representation be a consideration in distribution of places?</p>	<p>Universities must be able to respond to market demands quickly. Any process by which additional places are allocated must be proactive, easily, consistently and fairly assessed, and quickly administered. Geographical considerations may be a factor in the distribution of places.</p>
<p>What is the minimum viable allocation for enabling, sub-bachelor and PG places?</p>	<p>Based on the figures presented, overall the sector is under-enrolled across the three cohorts, although the distribution is markedly lumpy. The redistribution of under-utilised places to areas of clear demand is the key issue, to improve market flexibility and increase responsiveness to the demands of students. Further, delivery methods and scales vary enormously between disciplines and institutions. Discussion of sector-wide estimations of minimum viable allocations is therefore not meaningful.</p>

Issue	QUT Response
<p>How often should places be re-distributed?</p> <ul style="list-style-type: none"> Should this vary for enabling, sub-bachelor and PG places? 	<p>QUT's preferred position is allocation based on the April and September HEIMS submissions of estimates through the HEIMS system. This approach would be responsive to emerging market demands and supports real time consideration of program growth.</p>
<p>What proportion of places should be reallocated?</p> <ul style="list-style-type: none"> Should this vary for enabling, sub-bachelor and PG places? 	<p>Disused places, should be reallocated. The idea of reallocating a set proportion of places is inimical to the smooth operation of the sector and to the policy objective of distributing places according to market need, so has little policy merit.</p>
<p>What are stakeholders' views on the allocation criteria suggested above?</p> <ul style="list-style-type: none"> Are there other criteria which should be considered? 	<p>QUT's position on the suggested criteria are highlighted throughout this submission.</p>
<p>How should criteria be configured to ensure that institutions do not become 'locked out' of future reallocations?</p> <ul style="list-style-type: none"> Especially where they have a limited track record in delivery? 	<p>QUT believes that it is vital that mechanisms are in place to allow universities without current allocations to bid for places in future allocation rounds. QUT has outlined potential considerations, including:</p> <ul style="list-style-type: none"> Demonstrated demand for programs Strong institutional performance in comparable offerings, and Viable institutional arrangements to deliver allocated CSP places. <p>This will ensure the system is responsive to changes in student demand and provider appetite to deliver new programs, while still ensuring high quality programs are delivered that meet identified needs.</p>