DASSH welcomes the opportunity to make a submission in response to this DEEWR consultation paper. We note that the history of postgraduate coursework places in Arts, Social Science and Humanities (ASSH) Faculties varies considerably between Universities, reflecting different institutions’ missions and goals. These different histories have created a number of inequities between institutions in the past, which the consultation paper notes. DASSH believes that the decision to place caps on postgraduate places should aim to address these inequities, reduce inconsistencies between different aspects of Higher Education Policy and to reduce inefficiencies in administering postgraduate coursework. These aims should be informed by the array of drivers shaping postgraduate coursework programs in the ASSH sector.

The current national and international debate surrounding the purpose of, and standards expected for Honours and Masters (Coursework and Research) qualifications.

• At the national level, these debates include the roles of TEQSA and the AQF in developing minimum requirements for awards, assessing quality of programs and in establishing national standards.

• A second national development is the debate among ASSH Faculties about the role of Honours and Masters programs as pathways into Higher Degree by Research (HDR) awards.

• These debates are also influenced by responses to the potential impact of international developments, most specifically the Bologna model of higher education and preparation for Higher Degree by Research (HDR) awards (as three year undergraduate plus two year Master programs), US and some Asian models of four year undergraduate programs, and local moves towards generalist undergraduate and more specialised Masters programs (e.g. the University of Melbourne Model and new University of Western Australia and Macquarie University models).

• Many ASSH postgraduate programs at other universities currently support Honours and Master of Arts coursework programs oriented towards professions. In addition, postgraduate coursework programs are sometimes articulated programs allowing students with an undergraduate qualification to develop specialist knowledge and skills in a new discipline or studies area. These programs may be extended into preparation for an HDR award through an externally assessed, focused research project (as an equivalent to an Honours thesis). These postgraduate programs efficiently deliver a suite of professional skills, knowledge and research training preparation to
students, who may be uncertain about their aptitude for HDR work, but wish to avoid “back tracking” into an Honours program.

The Consultation paper is silent on existing University Compacts, through which each University has already made a commitment to deliver specific enrolment profiles over the next five years.

- The options canvassed in the consultation paper would have a significant impact on the capacity of Universities to realise their Compact objectives and might generate potentially perverse incentives at odds with existing stated government objectives relating to social inclusion and participation.
- The 2012 interim arrangements acknowledge there are several purposes for Commonwealth Supported Places (CSP) in postgraduate programs in Option Three allowing Universities to vary their allocation.

... Requests by a university to vary its allocation of postgraduate CSPs will only be approved if sufficient funds are available and the course:
(i) is, or is moving towards, being an accepted entry level for a profession; or
(ii) meets an identified need in an area of skill shortage; or
(iii) is of national significance (i.e. it fosters high level skills relevant to Australia’s research and innovation needs, national interests or cultural development). p. 14

The consultation paper does not reflect consideration of the potential effects of the different options on the availability of postgraduate programs in the range of broad discipline areas across the country. There is a risk that a comprehensive range of well-designed postgraduate programs will be lost from universities. However, the consultation paper seems to be focused on the role of postgraduate coursework places in developing a professionally accredited workforce, and treats as an afterthought the role of postgraduate places in realising the Bradley goals of an educated citizenry, and the importance of postgraduate coursework education in promoting and protecting culturally significant understanding.

It is unclear how DEEWR seeks to understand the role of AQF and TEQSA in establishing higher education awards and standards, if it appears to privilege external accrediting bodies in determining educational qualifications.

- The consultation paper does not appear to be informed by any international benchmarking either concerning comparable level and duration of postgraduate course or mapping of professional accreditation in different countries.
- The consultation paper seems to conflate establishment of qualifications that equip students to pursue specific professional roles with accreditation by external professional bodies. In several ASSH areas (e.g. Cultural Heritage
and Curatorial Studies, Journalism, Archaeology, TESOL, Indigenous Education and Anthropology) there is a demand for qualified professionals, but there is no specific accrediting body relating to those qualifications.

- In many cases this is because the professional activity is centrally academic and there has not been a parallel development of qualifications outside of the University system.
- In others it is because the demand for qualified professionals in the area is a recent phenomenon and there is no pre-existing professional body.
- The Consultation paper implies a preference for awarding places on the basis of professional accreditation. **Awarding CSP places on the basis of their need for initial professional entry will fail to address existing skills shortages in professional areas. It will negatively effect Australian graduates’ competitiveness in a global employment and skills market and make Australia less attractive to skilled migrants.**

It is notable that none of the options presented in the consultation paper adequately address the inequities that will result in placing caps on commonwealth supported places (CSP) based on the very uneven historic allocation of postgraduate places. DASSH would wish to see any decisions regarding commonwealth support of postgraduate places recognising the wider educational context and to consistently reflect commonwealth policy but avoiding overly burdensome administrative mechanisms. Finally, DASSH would strongly urge DEEWR to release any analysis of the relative costs and benefits of the different options.

**Option 1  Allocating additional postgraduate places for specific courses or types of courses.**

This option is likely to involve a high level of DEEWR intrusion into institutional arrangements and seeks to overly regulate postgraduate course management, effectively micro-managing enrolments through DEEWR. It is not clear that DEEWR has the resources to make this option work.

In addition there may be specific problems with Federal Government management in areas, where professional qualifications are governed by state based authorities (e.g. professional pathways for teachers or the health workforce).

**Option 2  Allocating additional places to ensure universities have a guaranteed level of postgraduate places.**

Option 2 goes some way to addressing historical inequities between institutions, and could allow institutions to pursue distinct missions in postgraduate education. However, DASSH argues that to achieve that outcome, allocation of places would need to be arranged to allow each institution to
determine or negotiate (consistent with its Compact) the profile of CSP postgraduate programs (Option 2, dot point 1).

**Option 3**  Allowing universities to negotiate their allocation of postgraduate places within an overarching funding envelope for the university.

Option 3 reflects the greatest consistency between the aim of establishing some caps on Commonwealth supported postgraduate places and the development of DEEWR and DIISR agreed University Compacts. It would allow Universities to develop postgraduate programs that reflect both their agreement to contribute to government goals and targets, while managing their specific capacity and areas of expertise or market share.

**Option 4**  Demand driven funding of all Commonwealth supported postgraduate student places.

This option has the virtue of avoiding the costly and cumbersome administrative reporting that Option 1 will require and it is likely to be seen as desirable to the larger players in the market. However, demand driven funding of all Commonwealth supported postgraduate places may create or perpetuate inefficient competition between institutions, where specific postgraduate programs are needed to develop professional skills, but where the demand for skilled professionals is relatively small and is best supported by relatively discrete “niche” programs. Demand-driven funding could see well-established and high quality programs being swamped by an aggressive competitor, who may not be able to sustain a program of equivalent quality.

Option 4 is likely to exacerbate existing inequities between institutions and may make professional qualification acquisition for working students effectively unachievable, as they may not be able to attend Universities that offer the relevant award as a part time or distance student.

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Submitted by:  
**Professor Krishna Sen**  
**President**  
**Australasian Council of Deans of Arts, Social Sciences and Humanities (DASSH)**  
1 Geils Court, Deakin, ACT 2600  
T: 02 6285 8228  
E: eo@dassh.edu.au  
W: www.dassh.edu.au  
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