



# Australian Universities Accord Interim Report - submission analysis

Department of Education

6 November 2023

## Our promise: A bigger idea of success

We exist to achieve positive influence. This means we work with clients to improve services for people and communities, strengthen business performance, support a productive and inclusive economy, and protect the natural environment.

To increase our combined influence, when we partner with you we think big. We elevate your ambition and sharpen your sense of what's possible.

We recognise that diversity in people, thinking and approach can solve the most complex challenges. As we collaborate, we think deeply and adaptively. We draw on your strengths and invest in your capability. Working together in this way we become far more than the sum of our parts. We achieve a bigger idea of success.

## Our professional standards

1. We act honestly and with integrity.
2. We always act in our client's best interests.
3. We ensure the independence of our advice and support.
4. We declare actual and potential conflicts of interest and manage them transparently with our clients.
5. We recognise and protect the confidentiality of our client's information.
6. We respect the confidentiality of our client's identity.

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Nous Group acknowledges Aboriginal and Torres Strait Islander peoples as the First Australians and the Traditional Custodians of country throughout Australia. We pay our respect to Elders past, present and emerging, who maintain their culture, country and spiritual connection to the land, sea and community.

This artwork was developed by Marcus Lee Design to reflect Nous Group's Reconciliation Action Plan.



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# Executive summary

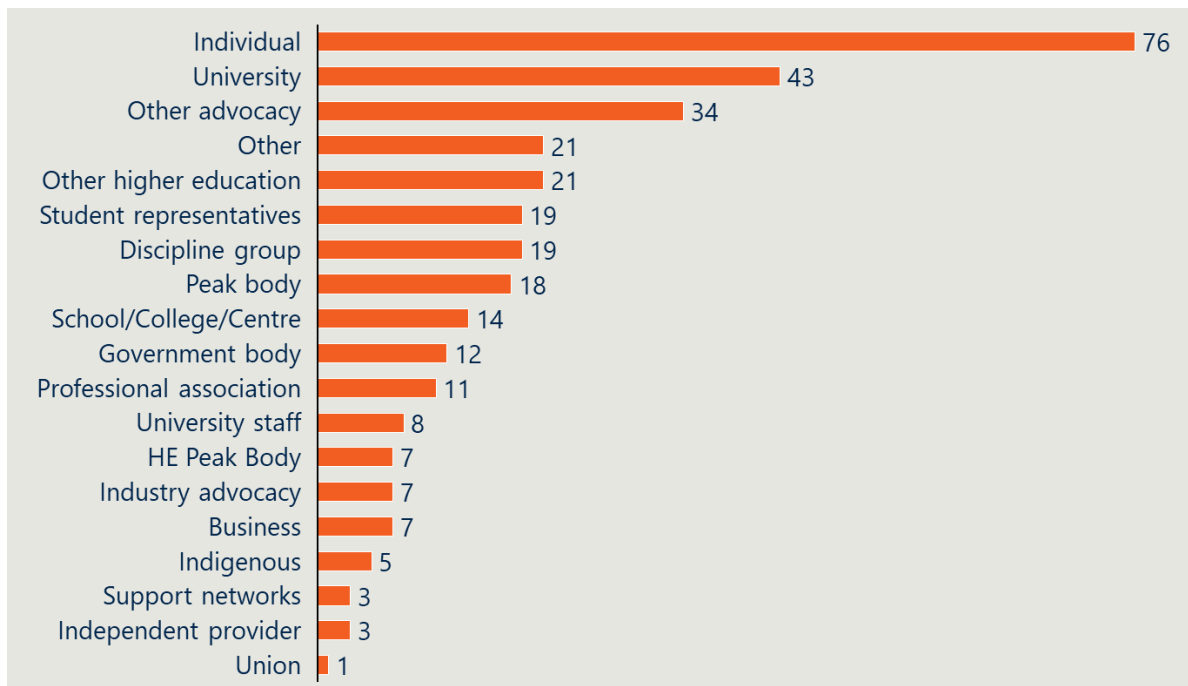
## About this report

The Australian Universities Accord is an initiative by the Australian Government to increase alignment between Australia’s national goals and the higher education sector. In July 2023, the Australian Universities Accord Panel invited stakeholders to make submissions to the Accord Interim Report outlining the fundamental challenges and opportunities facing the Australian higher education sector.

Nous Group (Nous) the author of this report, conducted manual analysis of the 329 submissions received by 20<sup>th</sup> October 2023.

Submissions came from a wide range of stakeholders, as illustrated in Figure 1.

Figure 1 | Distribution of submissions by respondent category<sup>1</sup>



Nous has identified common themes and recommendations from the submissions and has made best efforts to represent the diverse perspectives and recommendations in this report. Not all recommendations and perspectives are included in this report. This document does not provide comment about the validity of statements, nor does it provide subjective opinion or inferences about statements.

The structure of this report in part follows that of the Accord Interim Report.

## Evolving the mission for higher education

Submissions provided recommendations for Evolving the mission for higher education. The table below provides a summary of these recommendations.

<sup>1</sup> The other category is comprised of anonymous submissions, as well as End Rape on Campus, What were you wearing Australia and the STOP campaign.

Accord Interim Report section	Key themes
First Nations at the heart of Australia's higher education system	<ul style="list-style-type: none"> <li>• The creation of a new First Nations Higher Education Council was supported by submissions as a mechanism to improve visibility of First Nations perspectives. (20 submissions)</li> <li>• Self-determined approaches to national funding and policy settings affecting First Nations People in higher education was supported by the majority of submissions that mentioned this topic. (9 submissions)</li> <li>• First Nations-led review of access, participation and outcomes for First Nations people in higher education was identified as an important step towards self-determination. (7 submissions)</li> <li>• Collaboration between First Nations communities, governments, universities and industry was noted as an important action to enhance research capability and use of First Nations knowledge. (12 submissions)</li> </ul>
A larger, fairer system	<ul style="list-style-type: none"> <li>• Setting targets for participation through consultation was broadly supported with caveats to ensure that targets do not undermine university autonomy or disempower student choice. (14 submissions)</li> <li>• Creating higher education participation targets, revising the definition of equity groups and consideration of the risks posed by target setting was broadly supported, however risks associated with significantly higher education targets must be managed. (65 submissions)</li> <li>• Implementing a universal learning entitlement was supported - some submissions argued more detail is required to ensure its success. (26 submissions)</li> <li>• The collection of more granular, practice-relevant data was recommended by submissions to inform policy, and track progress. (34 submissions)</li> </ul>
Meeting Australia's future skills needs	<ul style="list-style-type: none"> <li>• Jobs and Skills Australia (JSA) should provide advice through a Tertiary Education Commission (TEC) was recommended to better understand future skills needs and improve workforce planning. (22 submissions)</li> <li>• Encouraging greater alignment between the higher education and vocational education and training (VET) systems was a priority for submitters. (55 submissions)</li> <li>• Expanding stackable, modular microcredentials was largely supported as an approach to ensure rigorous, consistent levels of skill, knowledge and transferability of courses. (38 submissions)</li> <li>• Increasing engagement with industry was identified as an important action to ensure Australia's workforce is absorbing and utilising new knowledge. (26 submissions)</li> <li>• Updating the support for students undertaking WIL and placements was recommended to help meet Australia's skills needs. (51 submissions)</li> </ul>
Equity in participation, access and opportunity	<ul style="list-style-type: none"> <li>• Outreach programs to schools and improving career advice were identified as important approaches to encourage students from underrepresented groups to aspire to higher education and fulfil their potential. (20 submissions)</li> <li>• Submissions supported making it easier for students to enter, exit and return to higher education, encouraging increasing recognition of exit pathways and ensuring tertiary arrangements are facilitative. (10 submissions)</li> <li>• Increasing access to preparatory and enabling programs to provide more pathways into higher education received broad support from submissions,</li> </ul>

Accord Interim Report section	Key themes
	<p>however there were differing preferences for implementation. (29 submissions)</p> <ul style="list-style-type: none"> <li>• New pedagogies to better scaffold learning, more specialist support and increased digital delivery were recommended by submissions to help students achieve their qualification in minimum time and debt. (40 submissions)</li> <li>• A national jobs broker system to help students find part-time work in their areas of study was supported, with suggestions for implementation. (5 submissions)</li> <li>• Support was expressed for a student-centred needs-based funding model, which recognises the full costs involved in teaching students from equity and disadvantaged groups. (40 submissions)</li> <li>• Submissions supported and provided recommendations to reduce the cost of living barriers to higher education. (56 submissions)</li> <li>• Submissions did not support Income Contingent Loans (ICLS) as an option to help students meet living expenses. (6 submissions)</li> <li>• Submissions recommended revisions to student contribution amounts and High Education Loan Program (HELP) repayment arrangements. (37 submissions)</li> </ul>
Excellence in learning, teaching and student experience	<ul style="list-style-type: none"> <li>• Sharing of best practice, supporting new teaching staff and establishing a National Learning and Teaching Committee were supported as new and more collaborative approaches to teaching. (13 submissions)</li> <li>• New competitive funding programs, incentives to adopt best practice and rewarding innovative approaches were supported as new potential funding incentives and programs. (44 submissions)</li> </ul>
Fostering international engagement	<ul style="list-style-type: none"> <li>• Improved accommodation options, embedding international education in university missions and promoting teaching flexibility were proposed as changes to improve the experience of international students. (16 submissions)</li> <li>• Improving visa pathways, migration and supporting Australian foreign policy objectives was identified as important for fostering international engagement. (18 submissions)</li> </ul>
Serving our communities	<ul style="list-style-type: none"> <li>• Submissions argued that higher education institutions should recognise and document their relationship with the community. (10 submissions)</li> <li>• Submissions encouraged higher education to develop closer ties with local industry and stakeholders to support community development efforts. (9 submissions)</li> </ul>
Research, innovation and research training	<ul style="list-style-type: none"> <li>• Sufficient funding for research, support for the ARC, capacity to deliver research towards Australia's national priorities, improving research measurement and sufficient infrastructure funding were identified as priorities by submissions. (67 submissions)</li> <li>• Increasing PhD stipends and creating research training targets for equity and regional groups were recommended to improve the research training system to support and attract students to research careers. (20 submissions)</li> <li>• Continuing support for university end-use collaboration programs and increased collaboration between research organisations and industry were</li> </ul>

Accord Interim Report section	Key themes
	recommended to improve the sharing and translation of research. (34 submissions)

## Foundations of a high functioning national system

Submissions provided recommendations for the Foundations of a high functioning national system & Building an Accord. The table below provides a summary of these recommendations.

Accord Interim Report section	Key themes
National governance towards a coherent tertiary system	<ul style="list-style-type: none"> <li>The establishment of a national Tertiary Education Commission (TEC) was broadly supported by submissions. (75 submissions)</li> <li>A National Regional University, new models for collaboration and new specialised institutions were considered as part of potential structural changes across the tertiary education sector. (49 submissions)</li> <li>Maintaining the unique value provided by higher education and VET and the potential of self-accrediting dual sector providers were identified as considerations when establishing a more aligned tertiary education system. (22 submissions)</li> </ul>
Institutional collaboration and governance	<ul style="list-style-type: none"> <li>Improving student wellbeing and safety and empowering students in decision making was a priority for some submitters. (32 submissions)</li> <li>Managing the casualisation of staff, staff workloads and professional development opportunities were identified as important to improve staff wellbeing. (20 submissions)</li> <li>Reducing the prevalence of corporate management practices in tertiary institutions was identified as an option to improve the operation of university governing bodies. (16 submissions)</li> </ul>
Sustainable funding and financing	<ul style="list-style-type: none"> <li>Submissions discussed a universal learning entitlement, mission based loading, appropriate discipline mix and improved stability as key principles for the design of a funding model. (51 submissions)</li> <li>New and regular approaches to activity based costing were discussed as an approach to improving the transparency of institutional spending and the cost of teaching and research. (22 submissions)</li> <li>JRG, updated HELP arrangements and varying student contributions were discussed as potential changes to ensure affordability for students. (21 submissions)</li> <li>Research funding was identified as a key area the sector needs to manage for its long term success. (40 submissions)</li> <li>Submissions universally called for an increase in infrastructure funding. (16 submissions)</li> </ul>

## Purpose of this report

This report has been developed to capture responses to the Australian Universities Accord Interim Report (July 2023). Nous Group (Nous), the author, has identified and summarised common themes and recommendations provided in the 329 submissions received from a range of stakeholders. The focus of this report is on the future of the sector, rather than the challenges. It maps submission responses against each section of the Accord Interim Report and is structured similarly to assist the reader.<sup>2</sup>

Submission responses are categorised and reported within the chapter they are most relevant to. The chapter sub-sections in this document do not directly correspond to the Accord Interim Report's 'Considerations for Change' or 'Potential Proposals', rather are a synthesis of responses to these two areas.

Subtotals outlined for sub-sections may not add to the total outlined for the section. This is because some submissions included commentary on multiple areas within the section and other submissions referenced the top level section but not subsections.

Nous has made every effort to communicate clearly and objectively the information provided by submissions. In doing this, all submissions have been treated equally, with no submission given greater weight than any other.

Where possible, the report provides a comparison between percentage of submissions discussing a topic in the Terms of Reference submissions, Discussion Paper submissions and Accord Interim Report submissions. This is only included at the top section level of the report, where a clear comparison to topics in previous rounds of submissions can be made.

It is important to note that this report does not explicitly capture all ideas and recommendations made in the submissions.

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<sup>2</sup> Nous has previously conducted the analysis for both the Australian Universities Accord Discussion Paper and Australian Universities Accord Terms of Reference.



## Priority Actions

Sixty-one submissions commented directly on the Accord Interim Report's priority actions. Responses typically noted whether the submitter agreed or disagreed with the proposed priority action, and often provided commentary around how the priority action should be amended or improved. The majority of priority actions were mostly supported.

### Priority Action 1: Extend visible, local access to tertiary education by creating further Regional University Centres (RUCs) and establish a similar concept for suburban/metropolitan locations.

Twenty-two submissions commented directly on Priority Action 1. Submissions were primarily in agreement, with fourteen agreeing substantively with the proposal and eight agreeing in principle, with some caveats. Three regional universities expressed enthusiasm for the creation of more Regional University Centres. The Country Universities Centre expressed enthusiasm for the proposal:

*"It is encouraging to see Priority Action 1 of the Interim Report focused on expanding the Regional University Centre program (now Regional Study Hubs Program), and the government's subsequent \$66.9 million investment to establish 20 new regional and 14 metropolitan Centres. These new Centres will make a demonstrable impact on widening participation and further embed the successful community-led model to drive parity of participation in higher education no matter where one lives." - Country Universities Centre. pg. 1*

The University of Adelaide and University of South Australia submission expressed the need for the action to be further evaluated but flagged the existence of *"a strong case for an extension of this program in outer metro areas."* (pg. 4) The University of the Sunshine Coast welcomed Priority Action 1 and commented:

*"We also see value in the new Suburban Study Hubs, subject to further scoping discussions, and based on the government's commitment that these new Hubs are located in areas without a significant physical university campus i.e., it is important they do not duplicate the public investment already made to create student access opportunities at existing peri-urban campuses." - University of the Sunshine Coast. pg. 1*

TAFE Queensland provided specific suggestions around how additional RUCs could be established most efficiently:

*"A way to enact RUCs in an efficient and effective manner is to embed the intended study hubs within the current national TAFE network. Rather than establishing new RUCs or additional hubs, TAFE campuses can be positioned as study hubs with established facilities and resources operationally managed with existing processes. This approach will enable national reach including rural and remote regional areas and will effectively widen participation while also providing the necessary student support services that TAFE institutions are well known for." – TAFE Queensland. pg. 3*

### Priority Action 2: Cease the 50% pass rule, given its poor equity impacts, and require increased reporting on student progress.

Nineteen submissions commented directly on Priority Action 2. Most of these submissions agreed with the action on the grounds of equity considerations, agreeing with the Accord Interim Report that such a rule disproportionately disadvantages students from First Nations and underprivileged backgrounds. Curtin University agreed with the action and suggested other approaches to tracking student progress:

*“Cease the 50% pass rule, given its poor equity impacts, and require increased reporting on student progress, Curtin strongly supports the removal of this punitive policy. In our experience, students fail for a variety of reasons and many fail for reasons that are outside of their control (e.g., they get sick, a family member gets sick, they have to work, they are balancing family responsibility and study, a pandemic strikes). Equity students are over-represented in those captured by the current 50% pass rule, particularly students from low SES backgrounds.” – Curtin University. pg. 1*

Four other submissions that agreed with the abolition of the 50% pass rule also noted the need to consider other methods for tracking student progress. The University of the Sunshine Coast disagreed with this perspective, arguing:

*“With respect to the cessation of the 50% pass rule, the ‘Support for Students Policy’ must minimise additional institutional reporting given most universities already have robust academic policies and procedures for monitoring and supporting student progression.” - University of the Sunshine Coast. pg. 1*

Edith Cowan University agreed with Priority Action 2, but voiced specific concerns around the draft legislation actioning its repeal:

*“However, the draft legislation for this change includes requirements for universities to have a support for students policy that will be prescribed by the Higher Education Provider Guidelines, with additional reporting obligations and penalties for non-compliance. ... fines are unnecessary and the imposition of further compliance obligations and the duplication of roles for TEQSA and the Department in this regard, is unwelcome.” – Edith Cowan University. pg. 3*

### **Priority Action 3: Ensure that all First Nations students are eligible for a funded place at university, by extending demand driven funding to metropolitan First Nations students.**

Priority Action 3 was received with overwhelming positivity by submissions. Of the 21 submissions who responded directly to Priority Action 3, 20 agreed with the action. Six of these submissions flagged that while extending demand driven funding to First Nations students is positive, actions will also need to be taken to provide financial relief that accounts for the costs of both living and studying. University Colleges Australia submitted:

*“We emphasise, however, that funded places should form part of a multi-layered approach to promoting the rights of First Nations students to a high-quality tertiary education. Colleges and places of residence have a significant role to play in providing a holistic support framework that will ensure that enrolment translates into degree completion.” - University Colleges Australia. pg. 2*

The Australian Research Council Centre of Excellence for Indigenous Futures applauded Priority Action 3, but expressed some concerns around whether it would be sufficient to substantially change university outcomes for First Nations students:

*“Encouraging more Indigenous Australians to enrol in a university degree will not be as simple as just uncapping places. While the Interim Report hints at an awareness that a holistic approach is needed, we wish to emphasise that for any university student to be successful, they must have foundational academic skills to support their learning.” - Australian Research Council Centre of Excellence for Indigenous Futures. pg. 2*

In contrast to most submissions, Edith Cowan University disagreed with the proposed action, arguing that overcoming the barriers faced by First Nations students would likely be more effective than providing more university places:

*“Extending demand driven places for enrolment of First Nations people is a supply-side measure that is unlikely to have a significant impact. Innovative demand-side approaches are needed to incentivise prospective students and to overcome significant barriers to access for First Nations people. ECU recommends that the Accord Panel considers incentives to improve student demand and which support success and completion, as well as access and participation, for First Nations people.” – Edith Cowan University. pg. 3*

#### **Priority Action 4: Provide funding certainty, through the extension of the Higher Education Continuity Guarantee into 2024 and 2025, to minimise the risk of unnecessary structural adjustment to the sector. Interim funding arrangements must prioritise the delivery of supports for equity students to accelerate reform towards a high equity, high participation system.**

Eleven submissions addressed Priority Action 4, all of which agreed with the proposed action. The University of Canberra stated:

*“We welcome the Government’s announcement around funding security for another two years. This is critically important to universities as they continue to recover from the pandemic. A two-year extension will allow for transition to a new funding model under the Accord.” – University of Canberra. pg. 1*

The majority of submissions also provided caveats, which detailed additional actions to support Priority Action 4’s implementation. Macquarie University Student Senators argued that ongoing dialogue with state and federal government is necessary to ensure that proposed funding aligns with sector growth. Deputy/Pro Vice-Chancellor Indigenous Group flagged the importance of ensuring funding guarantees extend to First Nations priorities:

*“Another step for the plan is to set clear guidance for the Higher Education Continuity Guarantee into 2024 and 2025 for universities to quarantine commensurate levels of funding for First Nations priorities. Funding received for First Nations priorities should be utilized to focus on innovative and systemic arrangements between schools and universities to ensure high flows of students beyond the expiration of the funds at the end of 2025.” – Deputy/Pro Vice-Chancellor Indigenous Group. pg. 3*

#### **Priority Action 5: Through National Cabinet, immediately engage with state and territory governments and universities to improve university governance.**

Ten submissions responded directly to Priority Action 5, all of which agreed in principle to the goal of improving university governance. Brian Yates agreed with the action and provided further perspective:

*“We also need State governments to take seriously their role in the oversight of the universities in their State. While a hands-off approach may have been appropriate 20 years ago, changes in the sector mean that State governments are in effect the only mechanism for providing checks and balances to a university’s operation and direction. State parliaments need to engage in dialogues with the universities in their State and understand, support and sometimes challenge their operation.” - Brian Yates. pg. 1*

University Colleges Australia strongly endorsed Priority Action 5 on the grounds that *“Australian tertiary institutions – including colleges – must do more to improve student and staff wellbeing, and are particularly*

*focused on efforts to promote student safety.*" (pg. 2) The University of the Sunshine Coast was also in agreement and proposed that:

*"effective institutional governance requires regular review and reform to ensure universities have contemporary, best practice frameworks, systems and processes, informed by a broad range of governing expertise across higher education, business, community, staff and students. ... we believe the governance agenda should also focus on tertiary education legislation and regulation harmonisation opportunities with the objective of streamlining / reducing the sector's already burdensome and complex governance and reporting obligations."* - University of the Sunshine Coast. pg. 1

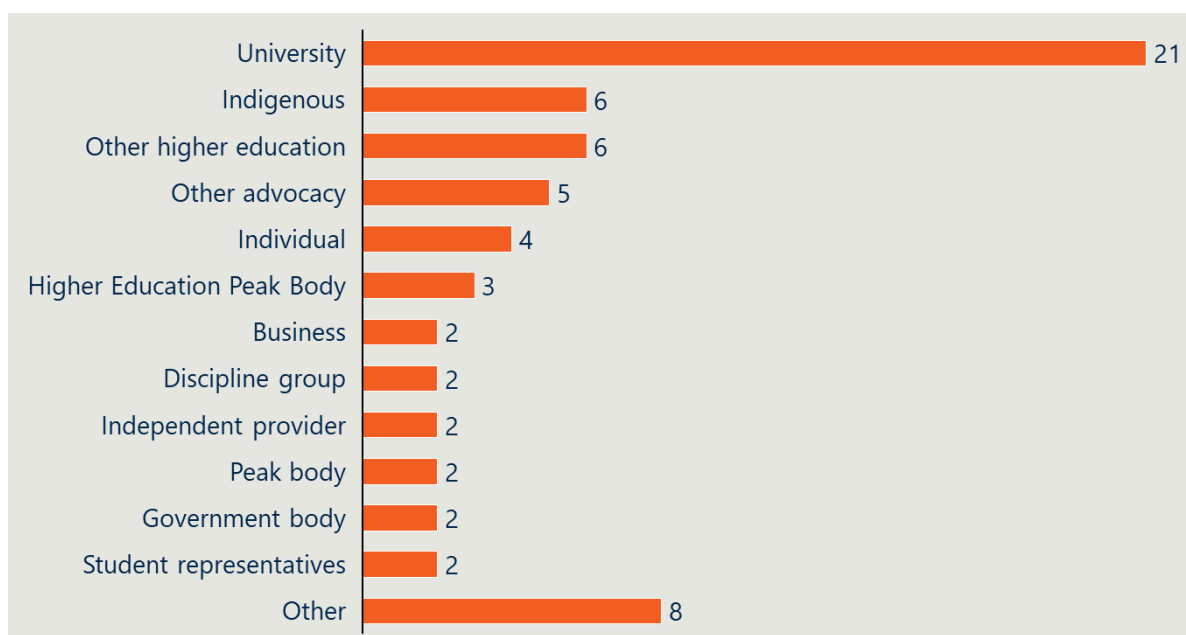
It is important to note that while direct responses to Priority Action 5 were in favour of the action, many submissions disagreed with specific proposals around strengthening university governance, throughout the body of the Accord Interim Report. These submissions are captured in relevant sections of this report.

## First Nations at the heart of Australia’s higher education system

The Accord Interim Report notes the “vital need to centre the experience of First Nations peoples in higher education.” (p.35) Sixty-four submissions (20 per cent of submissions) provided perspectives on putting First Nations people at the heart of Australia’s higher education system across the following categories:

- The creation of a new First Nations Higher Education Council was supported by submissions as a mechanism to improve visibility of First Nations perspectives. (20 submissions)
- Self-determined approaches to national funding and policy settings affecting First Nations people in higher education was supported by the majority of submissions. (9 submissions)
- First Nations-led review of access, participation and outcomes for First Nations people in higher education was identified as an important step towards self-determination. (7 submissions)
- Collaboration between First Nations communities, governments, universities and industry was noted as an important action to enhance research capability and use of First Nations knowledge. (12 submissions)

Figure 2 | Distribution of submissions by respondent category that addressed First Nations at the heart of Australia's higher education system<sup>3</sup>



### The creation of a new First Nations Higher Education Council was supported by submissions as a mechanism to improve visibility of First Nations perspectives.

Twenty submissions supported the creation of a First Nations Higher Education Council, with some providing detail on what implementation could look like. University of Queensland suggested that the Council should have the following characteristics:

<sup>3</sup> The Other category includes all anonymous submissions as well other stakeholders with only one submission addressing the subject.

- *“Indigenous led — constituted by Aboriginal and Torres Strait Islander people with experiential knowledge of the higher education sector.*
- *Mirrors the diversity of the higher education sector — includes representatives from rural, regional and urban institutions, and different types of providers (e.g., research intensive, dual sector, non-university).*
- *Has a transformative agenda — operates from a sovereign position on Indigenous education and delivers truth telling back to government.*
- *Implements transgenerational Indigenous practice — transfers knowledge from current Indigenous leaders to the next generation to sustain Indigenous leadership and vision for Indigenous higher education.” – University of Queensland submission. pg. 1*

The Deputy/Pro Vice-Chancellor Indigenous Group and Macquarie University suggested in separate submissions that the Council could play a role in developing compacts with universities:

*“The Indigenous Education Council can play a key role in the Compact Agreements with a clear focus on Indigenous outcomes and partnerships (i.e., vocational, industry, Indigenous organisations and professional organisations).” – Deputy/Pro Vice-Chancellor Indigenous Group submission. pg. 3*

*“The Council could play a significant role in developing compacts, particularly by ensuring that First Nations higher education is as much focused on success as on access. That success should not only be defined by parity or equity; it should be aligned to new forms of Indigenous self-determination.” – Macquarie University submission. pg. 3*

There was also the suggestion that the Council be renamed to the ‘First Nations Tertiary Education Council’ in suggestion that the Council’s remit should not be limited to higher education:

*“The First Nations Higher Education Council mentioned in the Interim Report is supported and should be for all the tertiary sector and therefore renamed accordingly.” – TAFE Directors Australia submission. pg. 5*

## **Self-determined approaches to national funding and policy settings affecting First Nations people in higher education was supported by the majority of submissions.**

Nine submissions addressed moving towards a self-determined approach to national funding and policy settings. Submissions focused on the need for greater funding oversight and the appointment of an Indigenous Commissioner as part of the new TEC. Four submissions explicitly supported the role of an Indigenous Commissioner, with Western Sydney University arguing:

*“For Indigenous people to truly be at the heart of the Australian higher education system, effective mechanisms are needed to ensure that their involvement in university and sector decision-making moves beyond representation (while increasing, it remains insufficient across all institutions and levels of the sector) towards self-determination...*

*One way to achieve this is by creating an Indigenous Commissioner as part of a proposed Tertiary Education Commission (TEC) along with requiring all universities to include Indigenous-agreed objectives and targets in a mission-based compact process.” – Western Sydney University submission. pg. 1*

Regarding funding, the Western Sydney University Indigenous Professoriate Group recommended that a proportion of institutional funds for universities be allocated based on Indigenous population parity:

*"We are suggesting a fairer allocation of these (teaching and research) funds to enable Indigenous success and as a clear manifestation of Indigenous self-determination policy ... We propose the allocation (or institutional acquittal) of a proportion of institutional funds that equates to Indigenous population parity (at present 3.8%). Combined with Indigenous governance, this mechanism would ensure funding self determination and equity, allowing for genuine and sustained measures to ensure the pipeline of Indigenous students into higher education, bolster success at university and enhance a highly qualified national Indigenous workforce and enable re-investment back into universities through Indigenous workforce participation." – Western Sydney University Indigenous Professoriate Group submission. pg. 3*

The National Aboriginal and Torres Strait Islander Higher Education Consortium (NATSIHEC) highlighted that there is currently limited oversight of the funding allocated to First Nations students, staff and communities from High Education Participation and Partnerships Program (HEPPP):

*"HEPPP initiatives are vital to the growth and engagement of prioritised student cohorts. With ten per cent of funds allocated based on Aboriginal and Torres Strait Islander enrolments (as per the legislated formula) the impact of HEPPP cannot be underestimated. Unfortunately, there are still a number of higher education providers who give little, or no, control of identified HEPPP funds to Aboriginal and Torres Strait Islander portfolios ... NATSIHEC recommends greater oversight of HEPPP funding distribution." – NATSIHEC submission. pg. 2*

## **First Nations-led review of access, participation and outcomes for First Nations people in higher education was identified as an important step towards self-determination.**

Seven submissions referred to use of First Nations knowledges and governance within universities, focusing on the need for more Indigenous leadership and staff. The Western Sydney University Indigenous Professoriate Group argues:

*"Our students gain significant benefits from seeing other Indigenous [sic] present across various roles in the sector – including through interaction with Indigenous academics in academic contexts (Bullen & Flavell, 2017; Moodie et al., 2018). If we are to realise the aspirations presented in the Interim Report an injection of funding is required to create more positions in the sector as well as opportunities to develop the academic pipeline." – Western Sydney University Indigenous Professoriate Group submission. pg. 2*

Similarly, there was emphasis on the need for Indigenous leadership:

*"Not all universities, nor broader higher education providers, have Indigenous representations, either academic or community, within their governing Council. An oversight and sad lack of connection to cultural expertise and greater connection to local, regional, national and international Indigenous communities ... NATSIHEC recommends that a review is undertaken of Aboriginal and Torres Strait Islander representation within higher education governance mechanisms." NATSIHEC submission. pg. 4*

Regarding teaching, the Australian Council of Deans of Science recommends embedding Indigenous knowledge into university curriculum:

*"We implore the Accord Panel to mandate universities to embed a minimum level of Indigenous knowledge into their curriculum, in addition to research (Section 2.7). This is essential for ensuring that all of our communities have an appropriate awareness, appreciation and respect for the contribution Indigenous knowledge makes to our society." - Australian Council of Deans of Science submission. pg. 1*

## Collaboration between First Nations communities, governments, universities and industry was noted as an important action to enhance research capability and use of First Nations knowledge.

Twelve submissions supported enhancing research capability for First Nations knowledges, with focus on the funding and workforce changes needed to enact this. Flinders University suggested that:

*"...as a starting point, the Australian Research Council be provided additional resources to establish new programs and to ensure that 5 per cent of its total funding goes to Indigenous researchers to match the 5 per cent target already set for the Medical Research Endowment Account."* – Flinders University submission. pg. 4

The importance of First Nations researchers and the need for research to be conducted ethically was emphasised by the NATSIHEC:

*"Research with Indigenous peoples and research conducted using Indigenous knowledges needs to be led by, and in collaboration with, Indigenous people themselves..."*

*Further, while the majority of Indigenous research is still being conducted is by nonindigenous researchers the sector must address how we engage researchers and institutions to be more ethical and construct projects with co-design, leadership and self-determination of Aboriginal and Torres Strait Islander peoples We must:*

- *Ensure Indigenous leadership and governance is a core competent in projects.*
- *Provide institutional research training for those seeking Indigenous research projects.*
- *Embed national codes of practice within institutions research culture.*
- *Ensure Indigenous 'expert readers' are full members of Ethics Committees.*
- *Establish Indigenous research strategies at all institutions."* – NATSIHEC submission. pg. 3

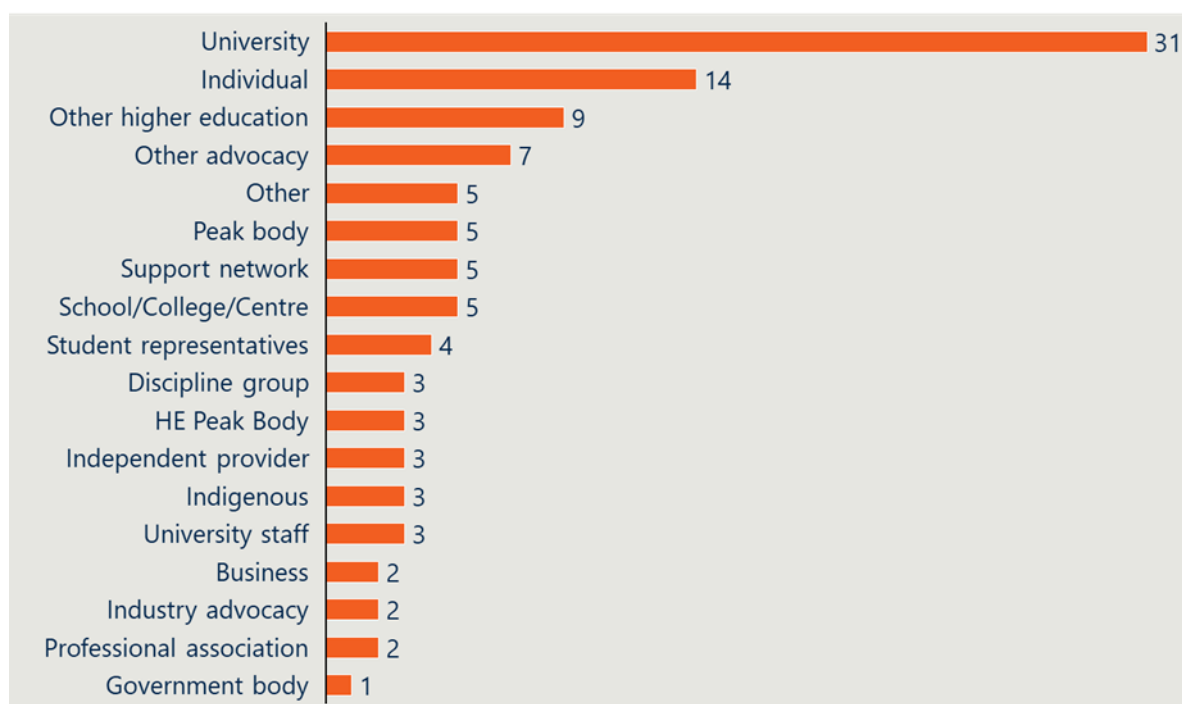


## A larger, fairer system

The Accord Interim Report notes that *“to succeed in the future, Australia needs to grow skills through greater equity.”* (p.41) Growing higher education attainment through greater participation and equity was regularly referenced, receiving 107 submissions (35 per cent of submissions) in response to the Accord Discussion Paper. One hundred and nineteen submissions (37 per cent of submissions) provided perspectives on the Accord Interim Report’s suggestions for a larger, fairer system across the following categories:

- Setting targets for participation through consultation was broadly supported with caveats to ensure that targets do not undermine university autonomy or disempower student choice. (14 submissions)
- Creating higher education participation targets, revising the definition of equity groups and consideration of the risks posed by target setting was broadly supported, however risks associated with significantly higher education targets must be managed. (65 submissions)
- Implementing a universal learning entitlement was supported, - some submissions argued more detail is required to ensure its success. (26 submissions)
- The collection of more granular, practice-relevant data was recommended by submissions to inform policy, and track progress. (34 submissions)

Figure 3 | Distribution of submissions by respondent category that addressed a larger, fairer system<sup>4</sup>



<sup>4</sup> The Other category includes all anonymous submissions and submissions that do not align to another listed category.

## Setting targets for participation through consultation was broadly supported with caveats to ensure that targets do not undermine university autonomy or disempower student choice.

Fourteen submissions referred to the Accord Interim Report's goal 'to grow skills through greater equity', with mixed reactions. While a focus on equity was generally supported, submissions questioned whether growing skills accurately represented the purpose of universities. Martha Kinsman argues:

*"The Report's clearest statement of the goal for expanding higher education is 'skills through greater equity' and occurs in the context of its discussion of national workforce skill needs. This goal reads like a functional descriptor of the current VET sector. The statement fails to acknowledge the broader roles of higher education in knowledge production, in transforming and optimising the life choices and opportunities of individuals and in contributing to community well-being as has recently been emphasised by the current Australian Treasurer. These broader aims may or may not be directly aligned to the perceived skill needs of the economy at any point in time. At the very least, the goal statement should be rephrased to refer to 'knowledge, skills and capabilities'." – Martha Kinsman submission. pg. 1*

Two submissions raised concerns that central planning of enrolment targets could diminish university autonomy. Andrew Norton argues:

*"Higher education undoubtedly should, and long has had, skills and equity goals among its many missions. But by long tradition, part of Australia's small-c constitutional order, universities have had significant independence from the government of the day. But the Interim Report contains more than 20 proposals that would diminish that independence (Appendix A). Some of these are major and others minor but cumulatively, if implemented, they would fundamentally change the character of the system – Andrew Norton submission. pg. 9*

Additionally, two submissions argued that the move to a central planning system would disempower student choice. University of Melbourne states:

*"Parts of the Interim Report suggest a move to a more centrally planned system, with a view to aligning with national skills needs and directing enrolments between locations. There is a major risk that this would disempower students, making it harder for them to study what and where they want. This will work against the aim of raising attainment levels and may make the system less (rather than more) effective in responding to labour market need. Retention of choice for the student and providing opportunities for them to aspire are crucial." – University of Melbourne submission. pg. 4*

## Creating higher education participation targets, revising the definition of equity groups and consideration of the risks posed by target setting was broadly supported, however risks associated with significantly higher education targets must be managed.

Sixty-five submissions included discussions of higher education participation targets, revising equity group definitions and potential risks posed:

- Creating specific higher education participation targets for students from underrepresented backgrounds and equity groups. (60 submissions)
- Revisions to the current equity groups were suggested to capture the full spectrum of underrepresentation. (22 submissions)

- Potential risks with setting targets for substantially higher participation in education included feasibility, and increased attrition rates. (14 submissions)

### **Creating specific higher education participation targets for students from underrepresented backgrounds and equity groups.**

Setting equity targets for students from underrepresented backgrounds and equity groups was an intensely addressed topic, referred to by 60 submissions. The idea of improving equity, access and participation was broadly supported by submissions, which acknowledged that equity is closely linked to addressing Australia's skill needs, the universal learning entitlement and a need-based funding model:

*"Navitas strongly supports the Interim Report's key priority of supporting the participation and success of equity cohorts. This is important to ensuring both equitable access for students from these backgrounds, and also for the broader contribution uplift in participation for these cohorts will mean for the skilled labour force. ... the Universal Learning Entitlement places a specific emphasis on equity students, ensuring there is a place at university for those that meet the admission level. ...consideration of a new 'needs-based funding model', acknowledges students from equity backgrounds often require additional levels of support."* – Navitas submission. pg. 4

However, there were mixed reactions towards both the feasibility of participation targets, and the definition of equity groups.

### **Revisions to the current equity groups were suggested to capture the full spectrum of underrepresentation.**

The Accord Interim Report states on page 50 that *'the Review is considering creating specific higher education participation targets for students from underrepresented backgrounds and equity cohorts. This includes low SES, regional, rural and remote students, and students with disability.'* Twenty-two submissions outlined other cohorts that should be included as an equity group. The majority of these groups are captured in Equity Practitioners in Higher Australasia's submission:

*"Outlined below are recommended student groups to be considered within the 'Priority Learner' cohort to be further developed in a way that acknowledges the strong cumulative disadvantage that occurs across the intersectionality of these groups...."*

- *Aboriginal and Torres Strait Islander students*
- *Students from remote areas*
- *Students with disability, including medical conditions*
- *No parental experience of higher education (i.e., first in family)*
- *Students who are racially and culturally minoritised*
- *Students who are linguistically diverse*
- *Care experienced students*
- *Students with caring responsibilities*
- *Students who are part of LGBTIQ+ communities*
- *Students transitioning to higher education from vocational courses*
- *Students from refugee backgrounds and asylum seekers*
- *Students from Pasifika communities*
- *Students from schools with an ICSEA rating below the state average*
- *Women in non-traditional areas"* – Equity Practitioners in Higher Australasia submission. pg. 3

Three submissions suggested that language be amended from 'equity groups' to 'priority learners':

*"The 'equity' group labels represent deficit thinking, especially with respect to Indigenous Australians who have many strengths to contribute. We suggest that the 'equity' label be dropped and replaced*

*with the term 'priority groups' or 'priority learners.' We suggest that the focus shift towards valuing the strengths priority learners from all backgrounds bring to HE environment" – QUT's Widening Participation Team submission. pg. 2*

### **Potential risks with setting targets for substantially higher participation in education included feasibility, and increased attrition rates.**

Fourteen submissions raised concerns relating to the feasibility of the targets set in the Accord Interim Report. Submissions emphasised the need for targets to be realistic and backed by data, with some seeing the current targets as too ambitious:

*"The suggested target of population parity in participation by 2035 seems unrealistic. ECU recommends that the Accord Panel gives consideration to a suite of aspirational, but realistic, targets for the short, medium and long-term." – Edith Cowan University submission. pg. 2*

Five submissions argued that given the current academic conditions in Australian schools, a large increase in higher education attainment for equity cohorts is not feasible:

*"A precondition of substantial increases in low SES higher education participation is a stronger pipeline of academically high-achieving students coming through the school system. The release of the 2023 NAPLAN results focused on the proportion of students not achieving new higher minimum requirements. Historically, for students who are below the minimum reading and numeracy standards in Year 3 less than one in five reach the minimum standard in Year 5 and stay above it in the Year 7 and Year 9 tests." – Andrew Norton submission. pg. 20*

Submissions also addressed the higher risk of attrition for low SES students, and the need for outcomes targets to minimise these risks:

*"Participation targets also need to be accompanied by targets pertaining to the outcomes achieved by disadvantaged cohorts after they have entered post-secondary study, ensuring that institutions are monitored on these outcomes and incentivised to maintain support frameworks to improve upon them. ... Just working to increase the completion rates of existing students across Australian institutions would make a difference to the education outcomes of underrepresented cohorts. The use of outcome targets will help to ensure that providers are focused not just on expanding the number of equity students who commence but also on maximising the intended study outcomes for those students." – University of Melbourne Attachment submission. pg. 10*

### **Implementing a universal learning entitlement was supported - some submissions argued more detail is required to ensure its success.**

Twenty-six submissions referred to the development of a universal learning entitlement. Submissions supported the idea of a universal entitlement and broadly discussed its scope and how it would be funded (addressed below in section Sustainable funding and financing). Regarding its scope, submissions from independent higher education bodies stressed that the entitlement should explicitly include private and VET providers:

*"To achieve the desired outcomes the 'Universal Learning Entitlement' policy framework must be agnostic to institution type, backing a student's decision to study with either public or independent institutions. Only in this way could it be called both universal and an entitlement." – Independent Tertiary Education Council submission. pg. 5*

Navias argued that the entitlement should include access to university pathway programs. Similarly, the University of Sunshine Coast stated that they:

*"...support in principle a universal learning entitlement, including all students from equity cohorts being eligible for a funded place, underpinned by robust student support policies and funding that recognise the cost of supporting equity students who increasingly present with more than one form of disadvantage. Funded places must include bridging and sub-bachelor programs." – University of Sunshine Coast submission. pg. 4*

Four submissions expressed that more detail is needed towards operationalising a universal learning entitlement. University of Adelaide and University of South Australia stated:

*"... further examination needs to be given to this including who would fund such an entitlement. The universities recommend a funding model that supports the learning needs of equity groups and is linked to university missions to ensure the work of increasing participation by these groups is not inadvertently disincentivised." - University of Adelaide and University of South Australia submission. pg. 5*

## **The collection of more granular, practice-relevant data was recommended by submissions to inform policy and track progress.**

Thirty-four submissions referred to the need for more institutional and system-level data collection to capture information more effectively across higher education and specifically on existing and emergent equity cohorts. Submissions argued that data collection should also include metrics that measure student outcomes. Western Sydney University argued that:

*"Currently no centralised data exists to understand nuanced equity group outcomes including access, retention and success. This limits the ability of the sector to align and improve outreach across the school experience for students. Data collection can be improved across both student equity cohort tracking as well as monitoring, reporting and improving outreach activities to understand the impact of intervention strategies and share best practice." – Western Sydney University submission. pg. 2*

Four submissions addressed the importance of recognising the intersectionality of equity groups in data collection. The Australian Council for Educational Research argues that there is a:

*"...need for more robust mechanisms for data collection relating to 'equity groups' to inform evidence-based policy and practice within our higher education system. Consolidating what is already known in this space and making efforts to build a stronger evidence-base should be more central in policy development for higher education into the future. Further to this, the intersectionality of 'equity groups' needs greater recognition. There are well documented overlaps between 'traditional' equity groups, such as low-socioeconomic status, and 'emergent' groups like out of home care leavers and refugees (Harvey, et al., 2016). Developing ethical, yet systematic ways to collect data to support students for success should be a priority." - Australian Council for Educational Research submission. pg. 2*

Two submissions addressed the need for timely and up to date data to inform decision making and research. Andrew Norton argued:

*"The final report should include an update on the TCSI student data system. The May 2023 Budget allocated significant extra funding for TCSI.*

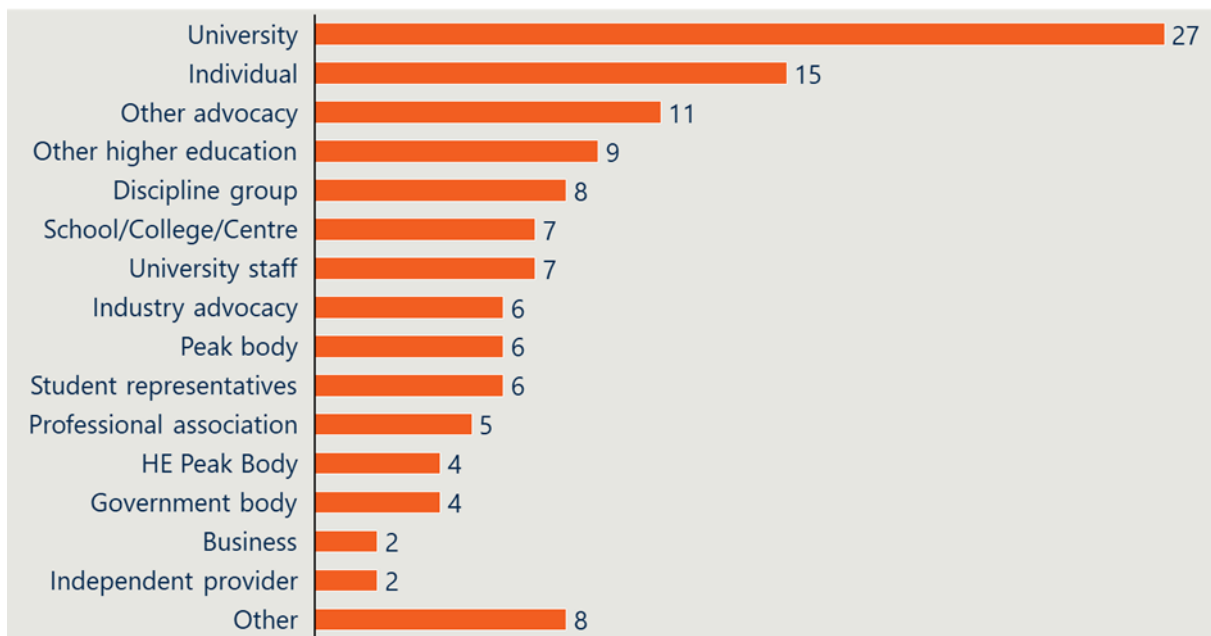
*[data provision] timelines need to be very substantially improved. Otherwise these delays are a fatal problem for a proposal to provide 'better planning than demand driven funding' (p. 131)." – Andrew Norton submission. pg. 8*

## Meeting Australia’s future skills needs

The Accord Interim Report notes that *“In an increasingly globalised and competitive international economy, we need the skills required to take advantage of future growth opportunities in emerging areas. There is more to do to support more people to be educated at various levels, and for these people to upskill and reskill.”* (pg. 53) Mechanisms and policies to progress towards a stronger system, which develops the skills for Australia’s future workforce was regularly referenced. 117 submissions in response to the Terms of Reference. One hundred and twenty-seven submissions (42 per cent of submissions) provided views on how to meet Australia’s future skills needs across the following categories:

- Jobs and Skills Australia (JSA) should provide advice through a Tertiary Education Commission (TEC) was recommended to better understand future skills needs and improve workforce planning. (22 submissions)
- Increasing the sector’s understanding of future skills needs, through advice from Jobs and Skills Australia (JSA) through a Tertiary Education Commission (TEC) and improved workforce planning was supported, with further engagement encouraged. (7 submissions)
- Encouraging greater alignment between the higher education and vocational education and training (VET) systems was a priority for submitters. (55 submissions)
- Expanding stackable, modular microcredentials was largely supported as an approach to ensure rigorous, consistent levels of skill, knowledge and transferability of courses. (38 submissions)
- Increasing engagement with industry was identified as an important action to ensure Australia’s workforce is absorbing and utilising new knowledge. (38 submissions)
- Providing better access to, and support for, students undertaking work integrated learning (WIL) and placements was encouraged to help meet Australia’s skills needs by submissions. (51 submissions)

**Figure 4 | Distribution of submissions by respondent category that address meeting Australia’s future skills needs<sup>5</sup>**



<sup>5</sup> The Other category includes all anonymous submissions and submissions which do not align to another listed category.

## **Jobs and Skills Australia (JSA) should provide advice through a Tertiary Education Commission (TEC) was recommended to better understand future skills needs and improve workforce planning.**

Twenty-two submissions made suggestions or commentary on how to improve our understanding of skill needs.

- Submissions supported utilising advice from JSA through a Tertiary Education Commission on Australia's future skills needs and actions needed to meet them. (11 submissions)
- Improving workforce planning through mapping all AQF qualifications across higher education and VET, building on the ASC, was supported by submissions. (6 submissions)

### **Submissions supported utilising advice from JSA through a Tertiary Education Commission on Australia's future skills needs and actions needed to meet them.**

Eleven submissions discussed utilising advice from JSA through a Tertiary Education Commission on Australia's future skills needs and actions needed to meet them. The submission from Future Skills Organisation illustrated the potential value JSA can provide:

*"Combined, JSA/JSCs and the Tertiary Education Commission could provide a more structured and scalable relationship with industry associations, improve collaboration, reduce regulatory burden and improve agility in responding to evolving practices in, for example, Work Integrated Learning, mentoring and Generative AI" – Future Skills Organisation submission. pg. 3*

Swinburne University also supports utilising the advice of JSA through a TEC, but encouraged further engagement:

*"Swinburne also supports the recommendation to establish a Tertiary Education Commission in discussion with the States and Territories. However, the government should consult widely on the establishment of this commission, as it did with JSA, to ensure that it delivers genuine value to the sector, rather than any additional regulatory or administrative burden." – Swinburne University of Technology submission. pg. 2*

### **Improving workforce planning through mapping all AQF qualifications across higher education and VET, building on the ASC, was supported by submissions.**

Seven submissions directly supported improving workforce planning through mapping all AQF qualifications across higher education and VET, building on the ASC. The Australian Council for Educational Research illustrated this sentiment in their submission:

*"We see the critical importance of having a clear, national framework on which skill development can be articulated and used for recognition, development of teaching and learning resources and potentially for regulation... The 'skills matrix' demonstrated in the ACER report has potential to ensure that Australian qualifications deliver recognised and transferable outcomes that serve the needs of individuals and industry." – The Australian Council for Educational Research (ACER) submission. pg. 3*

### **Encouraging greater alignment between the higher education and VET systems was a priority for submitters.**

Fifty-five submissions included recommendations or perspectives related to the Accord Interim Report's potential proposal of, *"Driving greater alignment and enhancing coordination and collaboration between the higher education and VET systems."* – Accord Interim Report. pg. 67. The Accord Interim Report cites:

*“Collaboration between VET and higher education is essential for improving skills development. Increasingly skills development in many areas of study will require both the best elements of VET and higher education” – Accord Interim Report. pg. 58*

Inconsistent admission practices between universities create unnecessary friction for students moving between VET and higher education. Twenty-nine submissions agreed with the Accord Interim Report to improve these pathways and recognition of prior learning. The Australian Chamber of Commerce and Industry described why better recognition of prior learning is important:

*“A better Recognition of Prior Learning (RPL) system is critical to allowing recognition between both VET and higher education providers. This will be particularly important as an increased emphasis on higher education will mean students will be moving between the two education systems in a nonlinear manner and should be able so, especially in courses and institutions that involve both sectors.” – Australian Chamber of Commerce and Industry submission. pg. 3*

The majority of the 29 submissions agreed with the concept of introducing a National Skills Passport. The potential benefits of the model was included in RMIT University’s submission:

*“A National Skills Passport (NSP) will make tertiary education more easily accessible to school-leavers, mature age learners, and those with less experience of post-school education and training. Coupled with a move to more skills-based classifications of demand, such as those currently being undertaken by Jobs Skills Australia, a NSP can provide an important scalable mechanism for creating a shared language to better capture, communicate, and reconcile where necessary, the wants and needs of learners and employers including improving the recognition of prior learning and relevant work experience” – RMIT University submission. pg. 7*

Increasing the rate of course co-design and collaboration between the VET and higher education systems are a potentially powerful way to increase student mobility. NSW Institute of Applied Technology - Digital’s submission argued that this is only possible if the government actively values and encourages this collaboration:

*“The aim of the IAT has been to value both VET and higher education experience and approaches. This was clear from the NSW Government’s initial commitment to the IAT model and has been maintained throughout the program.” – NSW Institute of Applied Technology - Digital submission. pg. 4*

The Australian Information Industry Association called out the importance of a more integrated system to support lifelong learning. This is enabled by more collaborative course design:

*“Breaking down the barriers between vocational education and higher education and promoting collaboration and innovation can improve access to knowledge and skills at different life stages. Building stronger connections between the VET and higher education sectors will improve education opportunities for students, especially those from equity groups.” – Australian Information Industry Association submission. pg. 3*

Enabling a more integrated tertiary education sector requires a funding system that supports providers to deliver education effectively and allows students to be supported through each stage of their education. The Accord Interim Report’s suggestion of extending eligibility for CSPs to other institutions, notably TAFEs, to enable this student movement was commented on by 13 submissions. Expanding access to CSPs to TAFE students was argued for by TAFE Queensland:

*“...inequity in funding access for TAFE institutions offering higher education qualifications means that students who choose to study at the Bachelor level at TAFE are disadvantaged. TAFE institutions offering higher education qualifications is key to widening participation in higher education. This point applies especially with regards to reaching rural and remote regional communities. Without*



*equitable funding however, the quest to widen participation is constrained.” – TAFE Queensland submission. pg. 7*

Not all submitters agreed, however - Swinburne University of Technology argued that dual-sector universities are a better option for a more aligned tertiary education sector:

*“Swinburne disagrees with the Interim Report that Commonwealth Supported Places (CSPs) should be extended at some AQF levels to the TAFE sector, unless the overall funding for CSP increases to cater for both universities and TAFEs. Already, large sums of funding from State Governments are provided to TAFEs across the nation .... We argue that dual sector universities are best placed to bridge the gap between VET and HE in areas of crucial skill need, as they can deliver across the full spectrum of tertiary learning.” – Swinburne University of Technology submission. pg. 2*

## **Expanding stackable, modular microcredentials was largely supported as an approach to ensure rigorous, consistent levels of skill, knowledge and transferability of courses.**

Thirty-eight submissions included recommendations or perspectives related to the Accord Interim Report’s potential proposal of, Ensuring rigorous, consistent levels of skill, knowledge and transferability of courses:

*“As the report notes, microcredentials offer a potential solution to skill shortages by providing tailored short courses that are accredited, stackable, and designed to be completed without requiring workers to take extended time away from their jobs. They should be easily accessible as a useful tool for upskilling workers in emerging technologies and processes and have HELP access.” – Australian Chamber of Commerce and Industry submission. pg. 2*

Similarly, microcredentials and short courses have been identified as an option for supporting increased lifelong learning and support the workforce to retrain when necessary:

*“There is a role for short courses or microcredentials in professional development, retraining and reskilling, and life-long learning, though when explicitly tied to career pathways or goals they may need to be formally accredited and should form part of a revamped AQF.” – Charles Sturt University submission. pg. 20*

However, the introduction of microcredentials should be implemented with caution. The National Tertiary Education Union expressed concern that:

*“the proposal to ‘stack’ micro credentials will result in a piecemeal approach to learning, failing to impart any real expertise or understanding that underpins a qualification. There are questions too, as to whether microcredentials are effective in developing important core knowledge and skills, creative thought, and critical inquiry. While much store is being placed on the hope that microcredentials will create a mass expansion of workforce skills and training development, unless the foundations in knowledge and expertise are laid, the ‘scaffolding’ approach to learning is unstable.” – National Tertiary Education Union submission. pg. 3*

In addition, the way that new microcredentials are funded will require consideration:

*“More access to FEE-HELP support could increase the uptake of microcredentials and stackable training courses. Microcredentials developed under the current Microcredentials Pilot in Higher Education are currently available for FEE-HELP, and should the pilot prove successful, consideration should be given to providing access more broadly.” – Business Council of Australia submission. pg. 4*

NSW Institute of Applied Technology called for *“Embedded industry certification, to provide students with practical credentials that are valued by industry and employers”* – Digital submission. pg. 2

The Regional Universities Network broadly agreed that industry should be engaged in the development of microcredentials, but that university education should not be solely focussed on meeting the needs of industry:

*“RUN therefore agrees that micro-credentials and smaller stackable credentials will require industry input into their design, however we do not agree that the role of traditional university undergraduate education should be solely focussed on aligning with the needs of industry. Universities are already embedding industry recognised credentials into existing degree structures improve graduate capability and graduate employability.”* – Regional Universities Network submission. pg. 32

Queensland Tertiary Admissions Centre supported both microcredentials and stackable modular credentials in its submission:

*“QTAC is pleased to see that micro-credentials and the broader discussion of portable and stackable skills pathways are a focus of this Interim Report.”* – Queensland Tertiary Admissions Centre submission. pg. 2

The National Association of Graduate Careers Advisory Services also included recommendations that the National Skills passport could help enable both microcredentials and stackable modular credentials:

*“The skills mapping tool, the National Skills Passport, the National Credentials Platform, improving skills pathways through in-demand, transferrable and stackable micro-credentials, short-courses and the provision of incentives for WIL, and improving the recognition of prior learning and financing work experience, are notable and welcome tools to support students’ navigation of life-long and life-wide career pathways.”* – National Association of Graduate Careers Advisory Services submission. pg. 3

Some submissions challenged the Accord Interim Report’s supposed inference that universities are stalling on implementing stackable credentials:

*“Deakin absolutely rejects the inference that the stalling of stackable qualifications and pathways is due to university disinterest. Deakin invested heavily in this area. The potential of universities here is limited by a lack of frameworks and ad-hoc funding. This must be part of a remade funding system.”* – Deakin University submission. pg. 9

Finally, 14 submissions agreed with the Accord Interim Report that the sector should be progressing the intent of the recommendations from the Review of the Australian Qualifications Framework through arrangements with industry, unions and governments, as a matter of priority. The AQSA submission however did provide a note of caution:

*“the misconception that VET provides a lower quality training product than higher education courses can create a barrier including for the development of clear credit and Recognition of Prior Learning pathways between the VET and higher education sectors.”* – ASQA submission. pg. 2

## **Increasing engagement with industry was identified as an important action to ensure Australia’s workforce is absorbing and utilising new knowledge.**

Twenty-six submissions included recommendations or perspectives related to the Accord Interim Report’s potential proposal of, Ensuring Australia’s workforce is absorbing and utilising new knowledge.

A common theme across the submissions, particularly in the skills discussions, is the importance of engaging with industry to ensure skills are aligned to Australia's needs.

One mechanism proposed to support industry to engage with the higher education sector was proposed by Universities Australia (UA) Deputy Vice-Chancellors Academic (DVCA) Executive:

*"Employers need to be supported to genuinely collaborate with educators to design and deliver credentials and value education. To enable meaningful access by employees to MC learning, new forms of 'Earner' learning support are required, along with new models for Workplace Learning."* – Universities Australia Deputy Vice-Chancellors Academic Executive submission. pg. 2

However, submissions cautioned that industry is not the only stakeholder to consider:

*"industry is one of the stakeholder in the education game. However, society, the environment, and (even) the students/graduates are equally stakeholders, and must be included in the parameters associated with curriculum design (and delivery)"* – Ian Thomas submission. pg. 2

The Australian Industry group identified that the primary mechanism to improve industry's capacity to absorb tertiary sector value is through improved partnerships:

*"Vastly improved partnership cultures are needed in both universities and industry that enable an enduring relevance of learning in complex current and future work environments. This can be actioned by incentivising universities to involve industry in multiple aspects of the learning framework: co-design, co-development of content, co-delivery, co-credentialling and co-assessment, in addition to research and work integrated learning activities."* – Australian Industry Group submission. pg. 2

Cooperative research Australia argued that more PhD scholars are necessary to improve absorptive capacity:

*"We will not be able to improve the absorptive capacity of industry without producing more PhD scholars who have experience and track record working in industry"* – Cooperative Research Australia submission. pg. 5

## **Updating the support for students undertaking WIL and placements was recommended to help meet Australia's skills needs.**

Fifty-one submissions discussed the important role that work integrated learning plays in ensuring that Australia's skills needs are met. The Accord Interim Report stated *"WIL builds stronger connections to the workforce while studying and improves employability and career satisfaction"* – Accord Interim Report. pg. 61

The largest current barrier impacting WIL in universities is the financial pressure placed on students while undertaking placements. This theme was included in 41 submissions.

Universities Australia included an outline of why effective funding is essential for a successful WIL strategy:

*"Funding is a key driver of a successful WIL strategy .... To ensure the sustainability of WIL, federal and state/territory and local governments could consider options that encourage and support WIL engagement across the nation. These include:*

*Funding for students:*

- *Bursaries and/or stipends to support participation in WIL with priority schemes aligned to national skill development needs and equity student groups.*

- *Accommodation and travel subsidies for individual student circumstances.*

- *Direct payments for mandatory training in health and teaching professions.*

*Funding for higher education: • Support for researching, developing, implementing and evaluating innovative and flexible WIL programs that favour co-creation and meet work demands.*

- *Priority support for collaboration with SMEs and regional businesses.*
- *Support for teaching that supports at-scale and transdisciplinary WIL.*
- *Support for infrastructure such as innovation hubs.*

*Funding for industry: • Incentive schemes to encourage participation in WIL activities, particularly for SMEs, such as tax incentives and opt-in programs.*

- *Wage subsidies and/or training supplements into a Lifelong Learning Trust to encourage payment for students undertaking work-based WIL.*
- *Support for infrastructure designed to facilitate and grow WIL.*
- *Priority schemes for SMEs and regional businesses where participation is costly.*
- *Priority schemes for industries with acute skill gaps and talent shortages.” – Universities Australia submission. pg. 15*

The Australian Chamber Commerce and Industry outlined the importance for the Federal Government to lead the way in developing a framework for WIL:

*“The federal government is key to the development of a national WIL framework to ensure a consistent approach. The student and industry experience should be at the centre of the WIL Strategy; all stakeholders should reap tangible benefits and a governance framework should be developed.” – Australian Chamber of Commerce and Industry submission. pg. 1*

The Australian Industry Group submission identified the previous work completed by other organisations in developing a WIL strategy, which the Accord panel could leverage:

*“The power of cross-sectoral collaborative relationships is apparent in the unique partnerships created through the 2015 National Strategy on Work Integrated Learning in University Education. The partners – Universities Australia, the Australian Collaborative Education Network, the Australian Chamber of Commerce and Industry, the Business Council of Australia along with Ai Group – have continued to monitor its progress ... For government the Strategy canvasses university funding arrangements; tax incentives to ensure Australia’s businesses (particularly small to medium enterprise) are able to effectively and equitably engage with WIL programs and also share in the benefits and outcomes; wage subsidies for employment based WIL, such as degree apprenticeships; and partnership opportunities to support WIL.” – Australian Industry Group submission. pg. 20*

One potential form of WIL explored by the Accord Interim Report is pre-vocational ‘cadetship’ roles in key industries and models and pathways that support ‘earning while learning’ models in key industry sectors, such as advanced apprenticeships.

The submission from Universities Australia Deputy Vice Chancellor (Academic) Executive identified the benefits such a program can have:

*“Participation in meaningful substantial WIL, co-curated with industry and community partners, is demonstrably the best facilitator of enhanced employment outcomes for learners and employers ... Encouraging the provision of WIL by employers to the benefit of more learners, might involve extending new funded industry traineeships / internship schemes beyond vocational education to Universities.” - Universities Australia Deputy Vice Chancellor (Academic) Executive attachment submission. pg. 3*

Submissions from TAFE Queensland and TAFE Directors Australia pointed out that work and learn models are a specialty of the TAFE sector:

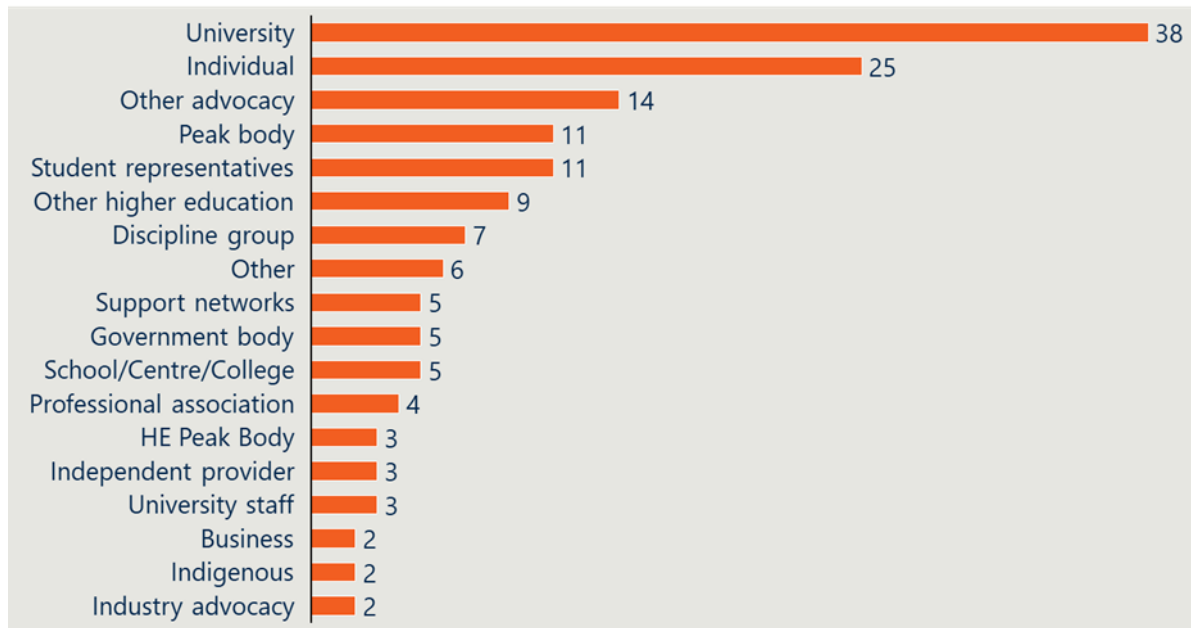
*“The ‘work and learn’ model of TAFE is its specialty and should not be replicated through the creation of higher education apprentices if they come at the expense of funding for TAFE. However, should higher apprentices proceed, and TDA acknowledges the merit of such a direction, then TAFE led dual sector providers, or university led dual sector providers are well positioned to lead the implementation of this type of innovation.” – TAFE Directors Australia submission. pg. 6*

## Equity in participation, access and opportunity

The Accord Interim Report notes the *“With a bigger higher education system, it must be made more accessible and equitable as a matter of urgency.”* (p.69) Equity in participation, access and opportunity was the most referred to section in the Accord Interim Report, receiving 114 submissions in response to the Terms of Reference, and 155 submissions in response to the Discussion Paper. One hundred and sixty-two submissions (50 per cent of submissions) provided views across each of the considerations for change outlined in the Accord Interim Report:

- Outreach programs to schools and improving career advice were identified as important approaches to encourage students from underrepresented groups to aspire to higher education and fulfil their potential. (20 submissions)
- Submissions supported making it easier for students to enter, exit and return to higher education, encouraging increasing recognition of exit pathways and ensuring tertiary arrangements are facilitative. (11 submissions)
- Increasing access to preparatory and enabling programs to provide more pathways into higher education received broad support from submissions, however there were differing preferences for implementation. (29 submissions)
- New pedagogies to better scaffold learning, more specialist support and increased digital delivery were recommended by submissions to help students achieve their qualification in minimum time and with minimum debt. (40 submissions)
- A national jobs broker system to help students find part-time work in their areas of study was supported, with suggestions for implementation. (5 submissions)
- Support was expressed for a student-centred needs-based funding model, which recognises the full costs involved in teaching students from equity and disadvantaged groups. (40 submissions)
- Submissions supported and provided recommendations to reduce the cost-of-living barriers to higher education. (56 submissions)
- Submissions did not support Income Contingent Loans (ICLS) as an option to help students meet living expenses. (6 submissions)
- Submissions recommended revisions to student contribution amounts and High Education Loan Program (HELP) repayment arrangements. (37 submissions)

Figure 5 | Distribution of submissions by respondent category that addressed equity in participation, access and opportunity<sup>6</sup>



### Outreach programs to schools and improving career advice were identified as important approaches to encourage students from underrepresented groups to aspire to higher education and fulfil their potential.

The Accord Interim Report states that ‘universities must look outwards and develop stronger links to the school and VET systems and the wider community’ (pg. 73). Twenty submissions responded to this topic, agreeing that widening participation cannot be done by universities alone and must also be addressed at a pre-tertiary level:

*“The Panel’s vision has the potential to establish a shared aspiration for Australia’s tertiary education system. The vision should also include that students entering tertiary education have access to excellent school-based education, which is fundamental, ... the most important lever to support students at university from equity cohorts is addressing the education gap (of essential knowledge and capabilities) that exists first in schooling.”* – Charles Darwin University submission. pg. 1

Twelve submissions supported aligning and improving outreach programs across early childhood, primary and secondary education. Equity Practitioners in Higher Education Australasia provided a two-tiered model towards widening participation:

- (1) *“Nationally Coordinated Approach to Widening Participation that:*
  - a. *Establishes a clearly defined and interconnected strategy for Widening Participation across all education sectors nationally that addresses the achievement gap from pre-school, school and post-education and training;*
  - b. *Enables national tracking and monitoring, through a national database, to understand and enhance the collective impact of Widening Participation across Australia;*
  - c. *Increases efficiencies in the delivery of Widening Participation activities, through coordinated national curriculum and resource design;*

<sup>6</sup> The Other category includes all anonymous submissions and submissions that do not align to another listed category.

- d. *Supports state-based collaborations to enable every learner in every state to have access to widening access programs and activities, and effective pathways and career advice across the lifespan.*
- (2) *Place-Based Approaches to Widening Participation that:*
- a. *Are supported by a nationally coordinated and comprehensive approach;*
  - b. *Ensures that Widening Participation teams are not simply extensions of marketing and recruitment teams in higher education institutions, but instead focus on capacity building to enable students to pursue their desired post-school pathway.*
  - c. *Brings together multiple partners (including schools, vocational education providers, universities, regional university centres, industry and community organisations) to have a collective responsibility for the post-school destinations for individuals in their region;*
  - d. *Prioritises non-school leaver engagement to meet the Accord's national targets.*

*EPHEA recommends that specific funding for Widening Participation be allocated to providers (separate from funding for student support) to ensure spending on Widening Participation is transparent and accounted for, and to encourage collective responsibility across higher education providers to promote collaboration and cohesion as opposed to competition and marketisation.” - Equity Practitioners in Higher Education Australasia submission. pg. 2*

Six submissions supported improving the availability of accurate, appropriate and timely careers advice. The Smith Family in their recent research found there was demand for:

- More access to comprehensive careers advice at school, including in the middle years of high school, including support with subject selection for senior secondary and applying for post-school study.*
- More personalised one-on-one advice regarding post-school pathways and the exploration of options to help them achieve their goals.*
- A broader approach to careers advice, including information about labour markets, employment pathways, skills that will be in demand in the future and alternative pathways.*
- Strategies that support family members' access to up-to-date labour market, education and training information, and how they can support young people to develop their goals and plans to achieve them.” – The Smith Family submission. pg. 6*

## **Submissions supported making it easier for students to enter, exit and return to higher education, encouraging increasing recognition of exit pathways and ensuring tertiary arrangements are facilitative.**

Ten submissions referred to a national approach towards tertiary education admissions. Submissions generally agreed with the concept but wanted *“further information on what a ‘consistent national approach to tertiary education admission’ means.” – Latrobe University Attachment submission. pg. 5*

Three submissions discussed increasing recognition of early exit pathways (with appropriate credentialling of study to date), with options for students to recommence their studies at a later point in time:

*“The introduction of ‘intermediate qualifications’ points within a longer academic program where students can receive a qualification (such as a diploma or certificate) and then have the option to re-enter the program at a later point to continue their studies towards a higher qualification (such as a degree) would prove beneficial. These intermediate qualifications acknowledge the completion of a certain level of study and allow students to exit the program with a credential before completing the entire degree program. This would be positive for First Nations students that often*



*have many disruptions during their studies.” – Deputy/Pro Vice-Chancellor Indigenous Group submission. pg. 2*

Two submissions also touched on the need to ensure tertiary admission arrangements are accessible (especially for First Nations and equity groups) possibly through alternative admissions mechanisms to the ATAR:

*“The balance between SSCE with ATAR eligible package and those without, of roughly one third not pursuing an ATAR eligible package, (over half in WA), does not sit well with an ambition for more higher education attainment. It explains why universities, other than seven of the Group of Eight, have greatly expanded non-ATAR selection for recent school leavers...*

*Various options are set out below.*

*1. Restore the ATAR package as the predominant basis for higher education entry and the stand out benchmark. With consequence that – higher education cannot expand much, indeed might need to shrink...*

*2. Continue to expand and promote what appears to be happening now: – ATAR based entry for those who pursue that SSCE path; – non-ATAR pathways for those who choose a SSCE non ATAR package, making this better known and accepted...*

*3. Leave the SSCE packages intact (labelling something like University oriented, and General, for all futures) but make the ATAR a serious cohort rank that is calculated for the whole SSCE group...*

*4. Suggest to schools and universities that the senior secondary split of ATAR eligible package and other needs a major revamp, designed with intent that many to most will be in the running for a higher education place.” – Connor King submission. pg. 2*

## **Increasing access to preparatory and enabling programs to provide more pathways into higher education received broad support from submissions, however there were differing preferences for implementation.**

Twenty-nine submissions referred to increasing access to preparatory and enabling programs.

Submissions broadly supported increasing the provision of both types of programs:

*“the Panel should take a much greater focus on strengthening pathways and preparatory programs in higher education, which can play a pivotal role in equipping underprepared and educationally disadvantaged students with the knowledge, skills and mindset they need to approach and succeed in higher education. This is crucial to supporting the equity objectives articulated by the Panel and government.” – Australian Catholic University submission. pg. 5*

Thirteen submissions supported the increased delivery of pathway programs. Navitas contended that pathway programs have clear benefits over enabling programs:

- **Time efficient**, with the student's overall degree timeframes not extended as students gain full credit for completion of a Diploma pathway program*
- **Gain recognised qualification**, with students receiving a qualification on completion of the Diploma course, providing them with flexibility to re-engage in study at a time convenient to them whilst still holding an award level qualification that has value and recognition in the labour market*
- **Minimises unproductive debt** for both students and government by providing exit options for students through a 'nested' model that aligns directly with key study areas, as opposed to requiring full-degree completion before receiving an award...*

*Given the effectiveness of these programs, Navitas strongly recommends that a Universal Learning Entitlement include support for Diploma pathway programs that articulate into university degrees and that 'needs based funding' or 'loading' for equity students is available to support enrolment with a public and independent pathway provider of the student's choice." – Navitas submission. pg. 4*

Fourteen submissions supported increased access to enabling programs, and of these, four argued that enabling programs should be included in the AQF:

*"Enabling be included in the AQF at levels dependent on the program and cohort type, given the wide range of diverse student needs, to ensure formal recognition of their achievement and enable access/portability across institutions. A flexible framework of pathway unit types at different AQF levels provide recognition of the diversity of study levels and different cohort needs, as well as changing student contexts. Short preparation stand-alone micro-units to develop competencies and longer Enabling Awards would form an integral part of this flexible and contextualised framework to enable access and success. This would make Enabling programs a much more attractive proposition for students, including to persist and move through the stages of their study." – National Association of Enabling Educators Australia submission. pg. 2*

Submissions also contended that enabling programs should be enshrined in legislation and provided with adequate enabling loading:

*"The University advocates for the recognition of the structural role of free enabling programs in widening participation in our higher education. These pathways must be recognised in the Australian education landscape by enshrining them in legislation (removed by JRG legislation), and providing an enabling loading..." – University of Newcastle submission. pg. 2*

## **New pedagogies to better scaffold learning, more specialist support and increased digital delivery were recommended by submissions to help students achieve their qualification in minimum time and debt.**

The Accord Interim Report states on page 72, *'as the higher education system grows, a more diverse student cohort will require additional support to succeed.'* Forty submissions referenced this idea, broadly supporting the importance of learning supports for underrepresented and equity students and contending that greater resources will be required:

*"All students from underrepresented and disadvantaged backgrounds in higher education have distinct needs that require tailored and targeted approaches. For example, some of our members have developed guidance to assist academic and professional staff to identify at-risk students and provide support at critical points of intervention.*

*The government's ambitions in this area will only be met if there is adequate resourcing to expand the number of professional and academic staff to support students throughout their studies." – Australian Business Deans Council submission. pg. 3*

Five submissions argued that more specialist support staff is needed to support students, with three submissions focusing on the need for greater investment into equity expertise in higher education:

*"Equity in Australian higher education has been a national priority for the past 40 years. Despite this, there has been limited research or investment into equity practitioners..."*

...

*Pilot and evaluate a government-funded national training program for equity practitioners, co-designed by equity practitioners. The training program should involve a minimum standards component as well as ongoing training opportunities." – Tierney Marey submission. pg. 1*

Fourteen submissions discussed new pedagogies that could provide greater scaffolded learning and student engagement. Of these, seven advocated for the incorporation of Universal Design for Learning:

*“Recommendation: Universal Design for Learning and Transition Pedagogy should be specifically identified in the Higher Education Standards Framework to ensure that all students are enabled to fully participate and are supported to succeed over the course of their tertiary studies...”*

*Comprehensive and equitable attention to quality curriculum design to support all learners in a universal tertiary system, such as that argued for by the Accord Panel, is currently a critical missing piece in system-wide quality assurance...The mainstream prioritisation of institutional quality in inclusive course design (and its enabling of attendant quality in teaching, delivery and support provision) will be fundamental and determinative for increasingly diverse cohorts’ learning, success and retention.”* – Sally Kift submission. pg. 1

Four submissions argued that digital delivery is key to ensuring accessibility for students:

*“Providing a more flexible and adaptive approach to learning, specifically: To enhance accessibility, especially for students with disabilities and chronic illnesses, student carers, and those working whilst studying. Access to online learning options should be maintained for accessibility and flexibility.”* – University of Melbourne Graduate Student Association submission. pg. 4

## **A national jobs broker system to help students find part-time work in their areas of study was supported, with suggestions for implementation.**

Five submissions referred to a national job broker system, which was broadly supported. National Association of Graduate Careers Advisory Services suggested that this should be based on a hub-and-spoke model:

*“NAGCAS welcomes a national placement and job broker systems (P.10 i) – However, NAGCAS advocates for a place-based/ hub & spokes approach (i.e., Aligned to a national system, embedded in universities and grounded in Careers and Employability Learning (CEL) methodology) to leverage and extend existing significant university/industry footprint and partnerships. This model would ensure a joined-up approach, both at an institutional and at a national level, would safeguard and strengthen existing university/industry relationships and further strengthen universities as anchor institutions.”* - National Association of Graduate Careers Advisory Services submission. pg. 2

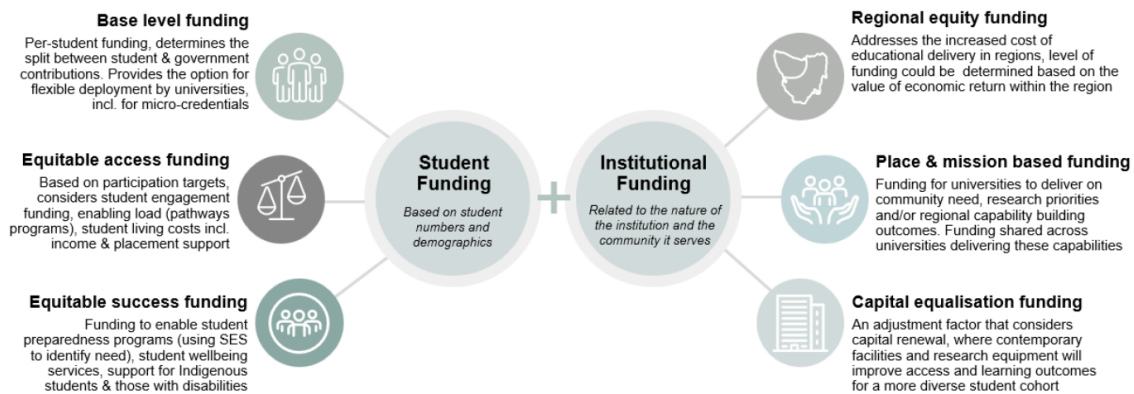
## **Support was expressed for a student-centred needs-based funding model, which recognises the full costs involved in teaching students from equity and disadvantaged groups.**

The potential for a needs-based funding model was referred to by forty submissions. While submissions were broadly supportive of the concept, suggestions varied as to its implementation. Submissions offered various options for how additional loading required for supporting equity groups and underrepresented communities should be calculated. University of Tasmania presented a model for how this could work, combining both institutional and cohort funding:

## Appendix 1: A sustainable future funding model

The funding model proposed by the University of Tasmania is comprised of both student funding components and institutional funding components. This model has been designed to achieve the Accord Interim Report objectives of a more equitable and diversified tertiary education system.

Figure One: Proposed higher education funding model



- University of Tasmania submission. pg. 5

Four submissions argued that funding should be based on mission-based compacts, and its associated strategy towards addressing disadvantaged cohorts:

*"We recommend that institutional funding and strategies to increase the access and participation of equity students are mission based, moving away from funding being enrolment or cohort based, to support University's to develop strategies..."*

*institutions could be required to submit Access and Participation Plans, similar to those submitted in the United Kingdom to the Office for Students, which outline long term strategies to address disadvantage through place-based approaches. The plans should be defined against a nationally consistent framework recognising the range of priority learner indicators and aligned through a commonality of student lifecycle phases to drive national consistency, whilst providing enough flexibility for institutions to be locally responsive." - Western Sydney University, Portfolio of Engagement and Advancement submission. pg. 2*

Three submissions highlighted that as the cost of supporting students is not linked to load, funding should be based on student headcount and not EFTSL:

*"It is also important to note that the cost of supporting students is not necessarily linked to load. i.e., a student studying part-time is likely to access as much (if not more) support than a full-time student. The Accord should pay particular notice to the cumulative challenges for part-time students." - La Trobe University Attachment. pg. 6*

A broader discussion of funding models can be found in section Sustainable funding and financing.

## Submissions supported and provided recommendations to reduce the cost-of-living barriers to higher education.

The Accord Interim Report states on page 78, 'The financial barriers to participation need to be addressed if we are to meet our equity targets.' Submissions strongly agreed with this sentiment, with fifty-six submissions referring to improved income support measures. For example, the National Union of Students argues:

*"The largest issue facing students and the main component of our submission has been the cost of living while studying ...*

*Expanding Centrelink access by lowering the age of independence to 18 and lifting the rate above the poverty line are key recommendations that need to be seen in the final report. Furthermore, the government must tailor policy and payments so that no student needs to work more than 24 hours a week so that they can devote sufficient time to their education.” – National Union of Students submission. pg. 2*

Twelve submissions emphasised that mandatory placements continue to be financially challenging for students, especially those from low SES backgrounds:

*“Prioritising financial support for equity cohorts as part of any national broker system to support Work Integrated Learning (WIL). ...While WIL can provide financial pressures for all students, we know from our experience and research that this is particularly so for students experiencing disadvantage, notwithstanding students’ acknowledgement of the value of such learning...*

*The Smith Family therefore strongly supports ‘improving WIL and placements by providing participating students with better incentives and financial support’ (Interim Report, p.57, and asks the Accord Panel to consider measures to ensure that priority is given to students experiencing disadvantage as part of any national WIL broker system, particularly in regard to financial support.” – The Smith Family submission. pg. 4*

Eight submissions advocated for more bursaries for disadvantaged students:

*“Many students face significant financial challenges during their studies. Both government and universities should collaborate to expand and better target scholarships, grants, and bursaries for disadvantaged students. However, fee structures must not be prohibitive to students studying and safety nets for students struggling financially must be sufficient. ...We need more affordable housing near campuses and transport to adequately address this issue.” – Dr. Carina Garland MP submission. pg. 2*

There were scarce dissenting opinions, notwithstanding this comment regarding part-time students:

*“The report mentions calls to extend income support to part-time students. While part-time students can already receive income support in limited circumstances the current provisions should not be extended. Statistical analysis shows that part-time study is the single biggest risk factor for non-completion. A significant benefit provided by student income support is that it facilitates full-time enrolment” – Andrew Norton submission. pg. 4*

## **Submissions did not support Income Contingent Loans (ICLS) as an option to help students meet living expenses.**

Six submissions responded to the potential of using ICLs to help students meet living expenses.

Submissions were not supportive of this concept due to concerns of increased student indebtedness:

*“The University agrees that income support must be improved, as indicated in the Interim Report. However, additional loans programs (including for living expenses) should be avoided as they risk further entrenching inequality, as was seen with the Student Financial Supplement Scheme in the 1990s.” – University of Melbourne Attachment submission. pg. 10*

## Submissions recommended revisions to student contribution amounts and High Education Loan Program (HELP) repayment arrangements.

Thirty-seven submissions referred to revising the HELP repayment arrangements. Suggestions among submissions ranged from reducing indexation, introducing debt incentives for rural students, writing off loans after fixed periods, to a total reform of the HELP system:

*"...the continuing validity of the basic assumptions and principles on which HECS was based, and which have been continued in a distorted form by the HELP scheme, require a more thorough analysis and review...."*

*Given the intention to create a genuinely accessible higher education system and a culture of lifelong learning, the rationale for the current loan system as almost solely a liability of individual students needs to be rejected in favour of a greater government funded grant component. Indeed, a case can be made for the replacement of HELP with a universal income levy. This would equalise the intergenerational contribution to the benefits of higher education." – Martha Kinsman submission. pg. 3*

Seven submissions called for student contributions amounts to be revised and for the Job-ready Graduates Package (JRG) to be revised, including the removal of JRG price:

*"The ratio of student to Commonwealth contributions must be overhauled across the field of education funding clusters, and substantially revised and simplified, to strip out the futile price signalling, attempted social engineering, and crude, reductive assumptions about graduate destinations that have distorted this cost-sharing scheme since the division of HECS into three bands.... The purpose of the student contribution is to assume a share of the cost of provision.... This could be achieved by fixing the student contribution at a uniform dollar figure per FTE across the board, as it was initially implemented, or at a constant proportion of the estimated cost of delivery for each field of education." – Queensland University submission. pg. 2*

Twelve submissions from the Muslim community stressed how the HELP system was incompatible with the principles of Islamic finance:

*"Ribā Prohibition: Islamic finance strictly prohibits engaging in ribā, which is considered unjust and exploitative. The HECS/HELP loan arrangement, where the loan increases in line with inflation, could be seen as aligning with the concept of ribā, raising ethical concerns for practicing Muslims who adhere to Shariah principles.*

*Dilemma for Muslim Students: The situation described puts Muslim students in a challenging position. They are faced with the choice of either participating in a system that may conflict with their religious beliefs or not pursuing higher education. This dilemma can hinder their educational and career prospects, limiting their potential contributions to both their community and society at large...*

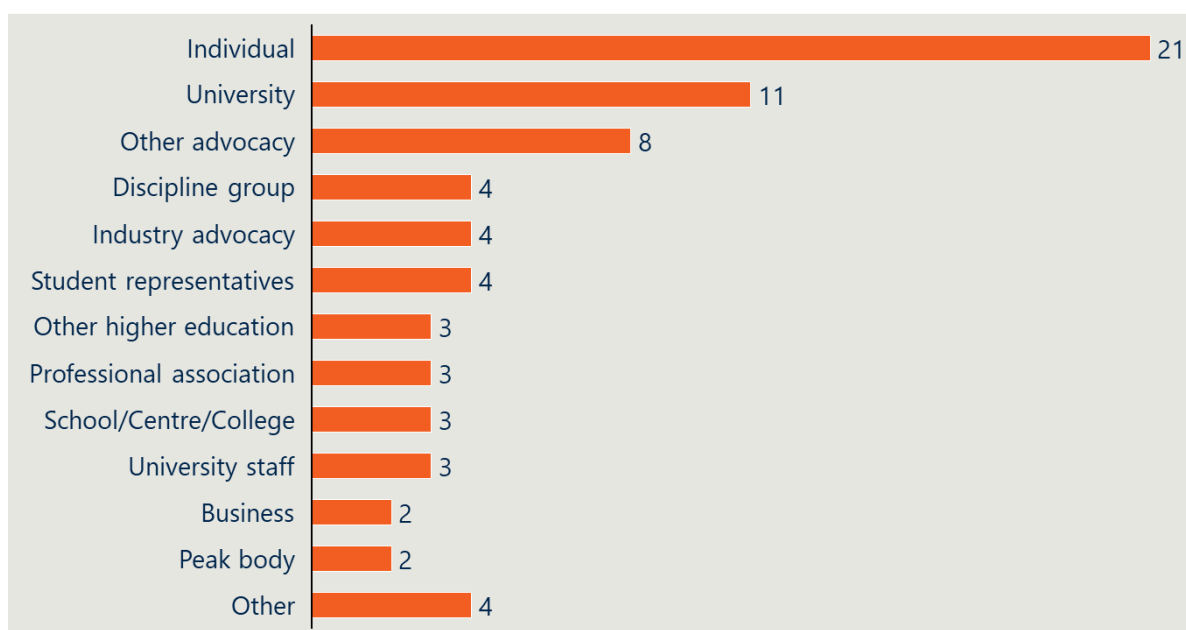
*Need for Alternatives: Considering the conflict between the loan system and Islamic principles, there is a need for alternative options that align with Shariah-compliant financial principles. Developing financial mechanisms that accommodate both educational aspirations and religious convictions would be beneficial for Muslim students and the community as a whole." – Saima submission. pg. 1*

## Excellence in learning, teaching and student experience

The Accord Interim Report notes that *“If Australia is to achieve the Review’s vision of educating many more students from all walks of life to various skill levels, then our higher education system must deliver a world-leading learning experience”* (p.81). Excellence in learning, teaching and student experience received 79 submissions (26 per cent of submissions) in response to the Discussion Paper. Seventy-two submissions (22 per cent of submissions) provided views across the Accord Interim Report’s discussions of excellence in learning, teaching and student experience (Refer Figure 6):

- Sharing of best practice, supporting new teaching staff and establishing a National Learning and Teaching Committee were supported by submissions as new and more collaborative approaches to teaching and learning. (13 submissions)
- New competitive funding programs, incentives to adopt best practice and rewarding innovative approaches were supported as new potential funding incentives and programs. (44 submissions)

Figure 6 | Distribution of submissions by respondent category that addressed excellence in learning, teaching and student experience<sup>7</sup>



### Sharing of best practice, supporting new teaching staff and establishing a National Learning and Teaching Committee were supported by submissions.

Thirteen submissions included discussions of the importance of and how to implement new and more collaborative approaches to teaching and learning.

- Promoting collaboration and shared best practice in learning and teaching was supported by submissions as a method for improving teaching and learning. (10 submissions)
- Establishing a National Learning and Teaching Committee (within the Tertiary Education Commission) received mixed feedback. (11 submissions)

<sup>7</sup> The Other category includes all anonymous submissions and submissions which do not align to another listed category.

- Submissions supported recommendations to enhance the professional development of academic staff in teaching, especially for those newly employed to teach. (12 submissions)

### **Promoting collaboration and shared best practice in learning and teaching was supported by submissions as a method for improving teaching and learning.**

Ten submissions supported promoting collaboration and shared best practice in teaching and learning:

*"The considerations for change highlighted in the Accord Report—specifically encouraging and rewarding effective learning and teaching practices (and implicitly measuring the effectiveness of these practices), and sharing these across the sector—would clearly benefit educational quality if implemented effectively."* - Dr. David Carrol submission. pg. 3

TAFE Directors Australia encouraged the collaboration and shared best practice include the whole tertiary sector.

*"Extend principle to all tertiary education contexts. Utilise the educational expertise of TAFE to enable excellence in learning, teaching and student experience."* – TAFE Directors Australia submission. pg. 12

### **Establishing a National Learning and Teaching Committee (within the Tertiary Education Commission) received mixed feedback.**

Establishing a National Learning and Teaching Committee was proposed by the Accord Interim Report to support collaboration amongst individuals and institutions to improve sector-wide teaching, learning and student experience. Eleven submissions included discussion of a National Learning and Teaching Committee with mixed sentiment. Eight supported the idea and three opposed.

The eight submissions that agreed with the proposal thought it would support collaboration in teaching and learning between institutions:

*"We endorse the establishment of a National Teaching and Learning Committee (or similar) to enable evidence-informed sector-wide changes required to address the existential threats currently facing post-secondary education."* – Jason Lodge and Cath Ellis submission. pg. 3

The submissions that opposed the implementation of a National Teaching and Learning Committee cited additional resource requirements as unnecessary or insufficient:

*"this may be unnecessary: many universities already have their own centres and programs in teaching and academic method, all of which could be given an enhanced role through better recognition of the importance of good teaching in funding, performance metrics, employment conditions, and accreditation. Other options include programs to support innovation in and evaluation of university teaching, or a national Centre of Excellence with nodes in each state, potentially offering some common content as part of an accredited professional development framework."* – Charles Sturt University submission. pg. 19

### **Submissions supported recommendations to enhance the professional development of academic staff in teaching, especially for those newly employed to teach.**

Twelve submissions included a discussion about the importance of and potential approaches to enhance the professional development of academic staff in teaching in the tertiary education sector. One submission recommended:

*"Make Quality Teaching academic development available across the sector to support academics to refine and enhance their teaching practice, thereby generating a high-quality learning environment and improving the student experience ... Quality Teaching academic development has already been*



*successfully piloted and implemented at the University of Newcastle. It centres on an evidence-based pedagogical framework, the Quality Teaching (QT) Model, which honours the complexity of teaching and provides a practical way for all academics – regardless of their discipline or level of experience – to develop a deeper conceptual understanding of quality pedagogy. Quality Teaching academic development can support analysis of practice, course planning, peer review of teaching, and the formation of communities of practice.” – Teachers and Teaching Research Centre University of Newcastle submission. pg. 4*

Two submissions noted the importance of ensuring that professional development is based on well established pedagogical theory and teaching research:

*“All academic staff involved in teaching and all academic managers up to and including the vice-chancellor should have a working knowledge of the student learning research and appreciate its implications for education at universities. This should be regarded as a long term but high priority goal.” – George Rosier. pg. 4*

## **New competitive funding programs, incentives to adopt best practice and rewarding innovative approaches were supported as new potential funding incentives and programs.**

Forty-four submissions included discussions of potential new funding incentives and programs.

- Submissions largely supported launching a competitive funding program across multiple institutions with material produced to be available under open access. (5 submissions)
- Encouraging and rewarding effective learning and teaching practices, was supported by all submissions that referenced the proposal. (14 submissions)
- Rewarding institutions taking a leadership role in learning and teaching, fostering excellence and improved performance across the sector was supported in submissions. (6 submissions)
- Greater industry engagement, teaching and learning informed by research and increased use of analytics were identified as approaches to encourage improvements in teaching, learning and curriculum development. (30 submissions).

## **Submissions largely supported launching a competitive funding program across multiple institutions with material produced to be available under open access.**

Six submissions included discussion of launching competitive funding programs to develop open access material. Five of these submissions agreed with the proposal with one disagreeing:

*“The proposal to launch a competitive funding program across multiple institutions (universities and TAFEs) with material produced to be available under open access (p. 90). However, we advocate that this recommendation be amended to explicitly state that the funding be dedicated to research and scholarship into the advancement of learning and teaching and encourages cross institutional collaboration and knowledge sharing.” – Professor Jillian Hamilton, Dr Andrea Adam and Professor Marina Harvey submission. pg. 7*

Another submission included a model of Distributed and Networked University Collaboration (DUNC), of which one area of benefit would be excellence in learning, teaching and student experience:

*“In the DUNC partners populate repositories of educational resources including portions of courses which, if completed successfully, lead to the award of microcredits. The resources are published as open access under an appropriate Creative Commons licence.*

*A system for peer review of the resources is developed to ensure quality and offer academic credit to the academics who provide them.*

*Assessment is offered by the partners who provided the resources carrying microcredits*

*Individual students enrol in the course of their choice, supported by RUCs and tertiary study hubs, who can also advise on how the microcredits may be used to build degrees in the partner universities.*

*Partner universities collaborate and agree to recognise the microcredits towards their awards, even if not gained from their own courses” – Richard Heller submission. pg. 2*

The submission from the Copyright Agency challenged the necessity of such a program:

*“The Interim Report refers to government funding for materials that would be made available under ‘open access’ arrangements. It is important that any such funding is underpinned by clear business cases and policy rationale. In particular, there appears to be no rationale for public funding of educational materials that are already provided by the private sector, particularly given the role of the education statutory licence in providing equality of access to those materials.” – Copyright Agency submission. pg. 2*

## **Encouraging and rewarding effective learning and teaching practices, was supported by all submissions that referenced the proposal.**

Encouraging and rewarding effective learning and teaching practices was supported by 14 submissions. These submissions encouraged mechanisms to support education providers adopt digital teaching platforms effectively. Two specific suggestions included:

*“The current transformation of learning materials will support the reinvention of teaching and learning in education in a number of ways:*

*A. Enhanced learning outcomes: High-quality digital resources, such as immersive simulations and interactive modules, can cater to various learning styles, thereby boosting learning outcomes. Data analytics can provide real-time insights into student engagement and performance, allowing for timely interventions that can improve outcomes for both students and institutions themselves. Virtual labs, AI-driven assessment tools, and automated feedback systems can manage large cohorts without diluting the quality of education.*

*B. Managing retention: Digital platforms can identify at-risk students through analytics, allowing for early interventions. Furthermore, the convenience and flexibility of digital learning can improve the student experience, thus aiding retention. Gamification and interactive content can make learning more engaging, reducing the likelihood of course dropouts.*

*C. Scalability and adaptability: As educational needs evolve, publishers and their products can swiftly adapt. Scalability ensures that institutions can cope with changing educational landscapes, be it remote learning during pandemics or integrating new scientific breakthroughs into the curriculum- and best practice pedagogy.*

*D. Educational equity: Digital learning resources democratise access to educational content. Whether students belong to marginalised demographics, face disabilities, or are based in rural areas, digital platforms can bridge social divides. Resources like adaptive learning platforms offer cost-effective, customisable materials that cater to diverse learning needs. Currently, there are clear equity and disability issues in university staff adding ‘inaccessible’ or ‘non-inclusive’ learning materials to LMSs.*

*E. Ameliorating staffing limits: Digital platforms can supplement human resources by automating certain administrative tasks and providing analytics for student performance. This can free up*

*faculty to focus on student engagement and mentorship.” – Australian Publishers Association submission. pg. 1*

*“There is a need to invest more heavily in curriculum that is inclusive and accessible. Experience and technology should be seen as part of an integrated redesign of learning and teaching rather than additional concepts bolted onto fixed conventional standards. I have argued with co-authors that a deliberately Accessible model of higher education is warranted<sup>5</sup>. Key elements of this model include: a tertiary system that supports life-long learning; better transitions from school to tertiary education and multiple entry, exit and re-entry points supported with learner profiles/passports; personalised curriculum; and a deep commitment to Accessibility and inclusion. If the system can adapt to the diverse circumstances associated with disability, the transformational benefits for all students will be profound.” – Dr Matt Brett submission. pg.3*

### **Rewarding institutions taking a leadership role in learning and teaching, fostering excellence and improved performance across the sector was supported in submissions.**

Six submissions discussed the proposal of rewarding institutions taking a leadership role in teaching and learning. The submissions included support in principle and suggestions for implementation. Suggestions for implementation included:

- *“Insight into such practices must not be limited to a small selection/judging committee (as is currently the case with the AAUT awards) but that, the awarded practices should be documented and shared across the sector within a repository of best practice to influence and inspire others. We also caution against limiting reward to performance-based funding (due to concerns for equity of opportunity) and propose reward should be in the form of accolades that contribute to reputational status and standing (which influences student choice).” – Professor Jillian Hamilton, Dr Andrea Adam and Professor Marina Harvey submission. pg. 7*
- *“RUN wishes to ensure that this would be an additional reward based upon a clearly defined and transparent excellence framework.” – Regional Universities Network submission. pg. 35*
- *“The reinstatement of the OLT or similar to provide grants and incentives for academics to enhance their teaching and learning practice, especially for diverse students and in regional Australia.” – ACHRC Humanities in the Regions submission. pg. 3*

### **Greater industry engagement, teaching and learning informed by research and increased use of analytics were identified as approaches to encourage improvements in teaching, learning and curriculum development.**

Thirty submissions included discussions about ensuring the system encourages improvements in quality learning and teaching, responds to new curriculum approaches that take account of the pace of new knowledge production, and provides for appropriate teaching infrastructure. The submissions focussed on approaches to ensure curriculum are up to date and fit for purpose.

Nine submissions encouraged greater engagement with industry when developing curriculum to ensure that teaching and learning is focussed on the skills industry needs:

*“...build strategic long-term alliances with universities who are willing to collaborate vertically and horizontally across the education and tertiary sector to create new and digitally-enabled educational programs and research expertise that align with future business requirements.” – Australian Industry Group submission. pg. 12*

Two submissions argued that high quality teaching and learning as well as relevant curriculum should be informed by research:

*"...Ongoing curriculum development is a hallmark of university teaching. Research outcomes inform this and keep our curriculum current. Research-driven curriculum design also inspires students to be curious, helps them to develop problem-solving skills and prepares them for a career in innovation. It is therefore essential that research-informed teaching continues to be enshrined in universities to the benefit of students and the innovation sector. We propose that this be achieved through education policy and retaining and supporting an academic workforce in which the majority of academics who deliver teaching are personally involved in knowledge generation or directly connected to research-intensive discipline experts who are at the forefront of their disciplines."* – Australian Industry Group submission. pg. 1

One submission argued for greater use of predictive analytics to track the skills that will be required into the future:

*"The sector should invest in predictive analytics to forecast the skills and qualifications that will be in high demand in the future. This data-driven approach can guide curriculum development and help educational institutions stay ahead of the curve."* – Anonymous submission. pg. 3

One submission also called for caution in any efforts to centralise curriculum development:

*"Governments have traditionally taken a non-interventionist approach. However, proposals in the Interim Report such as centralising or standardising mission setting, admissions, and recognition of prior learning, will undoubtedly narrow the range of course choices and limit pathways. We must carefully examine the rationale for moving away from this historically successful approach and thoroughly assess the potential risks that such a departure may entail."* – Bond University submission. pg. 2

More broadly, submissions also included discussions of teaching infrastructure:

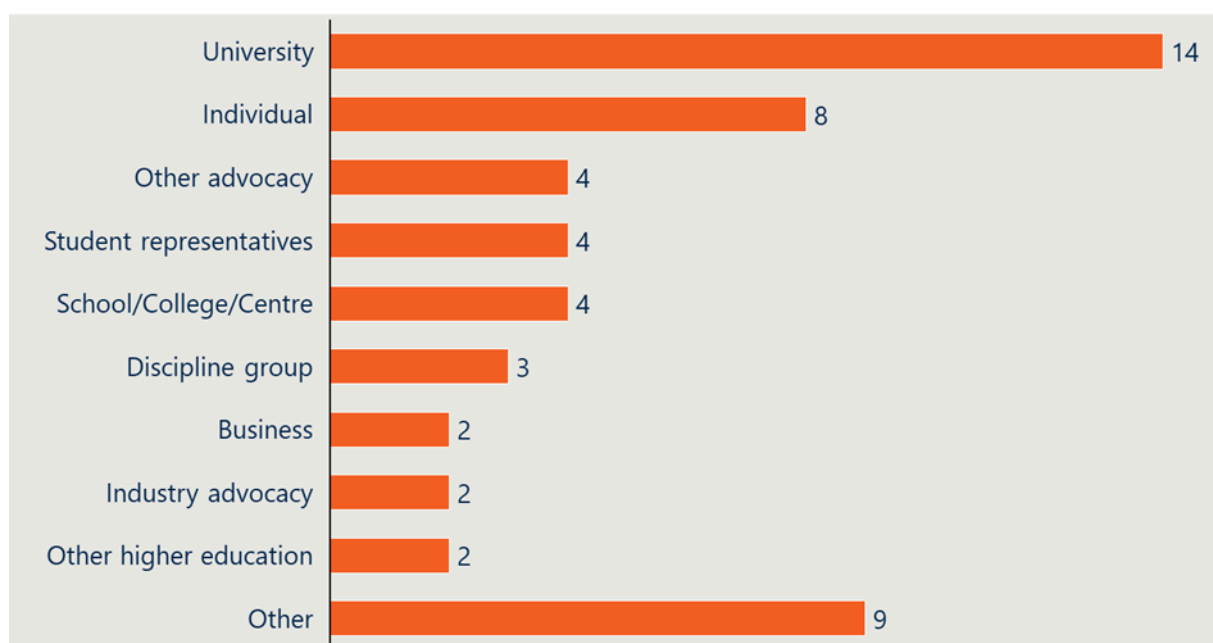
*"We implore the accord to encourage relevant parties to invest into building the teaching and training capacity through ensuring the availability of adequate supervisory capacities and appropriate infrastructure to enable high quality learning, especially in rural settings."* – Australian Medical Students Association submission. pg. 2

## Fostering international engagement

The Accord Interim report “examines the importance of Australia’s international collaboration as a core element of higher education’s teaching and research mission.” (pg. 91) *International engagement* received 52 submissions in response to the Discussion Paper (17 per cent of submissions). Fostering International engagement remained an important consideration for submissions responding to the Accord Interim Report, included in 52 submissions (16 per cent of submissions) (Refer Figure 5). These submissions discussed:

- Improving accommodation options, embedding international education in university missions and promoting teaching flexibility were proposed as changes to improve the experience of international students. (16 submissions)
- Improving visa pathways, migration and supporting Australian foreign policy objectives. (18 submissions)

Figure 7 | Distribution of submissions by respondent category that addressed fostering international engagement<sup>8</sup>



### Improving accommodation options, embedding international education in university missions and promoting teaching flexibility were proposed as changes to improve the experience of international students.

Sixteen submissions included discussions of how to improve the experience of international students:

- Submissions supported improving the variety and quality of accommodation options available to international students. (7 submissions)
- Embedding international education within the mission of Australian institutions was a priority for seven submissions. (7 submissions)

<sup>8</sup> The Other category includes all anonymous submissions and submissions that do not align to another listed category.

- Promoting flexibility and innovation in international education was noted by submissions, including digital and offshore delivery options, to foster international engagement. (6 submissions)

### **Submissions supported improving the variety and quality of accommodation options available to international students.**

Seven submissions flagged the need to improve the quality and variety of accommodation available to international students studying in Australia. These submissions argued that student accommodation should provide more opportunities for socialisation with peers, should be in proximity to international students' institutions to minimise the need for commuting and minimise the need to seek accommodation in the private rental market. The Council of Sydney University International House commented on the current state of international student accommodation in Australia:

*"In recent years student accommodation options typically have been developed by universities in conjunction with private developers, with an emphasis on minimizing cost. Such options provide essential physical infrastructure, but often neglect the social dimension of the student experience. In any case, many students are forced to resort to the private rental market for lack of reasonable alternative. For some students, the traditional university model of a residential college where a diverse group of students share meals has proven to be one of the most effective models for supporting the student experience, including the social dimension."* - The Council of Sydney University International House submission. pg.1

Two submissions suggested accommodation models that institutions could leverage to improve international student experiences. These included:

- Purpose-built student accommodation (Student Accommodation Council. pg. 3)
- The International House Model (The Council of Sydney University International House. pg. 1)

### **Embedding international education within the mission of Australian institutions was a priority for seven submissions.**

Seven submissions noted the importance of promoting international education as central to the mission of Australian tertiary institutions. The University of the Sunshine Coast argued in favour of developing avenues for regional universities to focus more heavily on international education:

*"The Government should also consider a market entry seed funding initiative to support smaller regional universities to increase their transnational education offerings."* - University of the Sunshine Coast submission. pg. 2

Two submissions suggested that sector stakeholders should help international students integrate by providing high-quality English language training. The Australian Technology Network of Universities (pg. 14) argued that the Panel should more broadly *"consider ways to strengthen the social licence for international education within the Australian community. There is potential for an International Education Ambassador to have real impact here."*

### **Promoting flexibility and innovation in international education was noted by submissions, including digital and offshore delivery options, to foster international engagement.**

Six submissions discussed innovative delivery options for international tertiary education, all of which agreed that there are potential benefits in pursuing offshore educational delivery to international cohorts. One submission considered the impact that offshore education delivery may have on the continued development of Australia's international partnerships:

*“The increasing focus on alternative and multi-modal approaches to content delivery arising out of the COVID pandemic means the continued development of these [international] partnerships also needs to consider the desirability of onshore vs. offshore delivery or a combination of both to facilitate maximum engagement.” - Defence Science and Technology Group submission. pg.3*

Similarly, one submission considered the effect of digital offshore delivery on Australia’s position in the international community:

*“There is a nexus between international education, quality, foreign policy objectives, integrity of visa pathways, innovation in international education (including digital and offshore delivery), high quality experiences, and recognition of overseas skills and qualifications, promotion of commercial use of research output, and building connections with international alumni. The nexus is vital.” – Denis Blight submission. pg. 7*

One submission proposed the development of a new form of collaborative university body, which would support the delivery of content internationally, the “Distributed and Networked University Collaboration (DNUC)”. The DNUC would:

*“Host an online network for global education, based on materials in the repositories but supplemented by other materials, created by partners both from universities in Australia and the Global South.” – Denis Blight submission. pg. 2*

## **Improving visa pathways, migration and supporting Australian foreign policy objectives was identified as important for fostering international engagement.**

Eighteen submissions included discussions of ensuring the accessibility and integrity of visa pathways and ensuring international education supports Australia’s foreign policy objectives. In response to the Accord Interim Report:

- Submissions supported ensuring that international education supports broader Australian foreign policy objectives, for example, strengthening relationships with India and the Pacific. (12 submissions)
- Ensuring the integrity and accessibility of visa pathways for international students was identified as important in submissions to support meet Australia’s skills needs and maintain international reputation. (8 submissions)

## **Submissions supported ensuring that international education supports broader Australian foreign policy objectives, for example, strengthening relationships with India and the Pacific.**

Twelve submissions included discussions of leveraging international education to support Australia’s foreign policy objectives. This was a contested topic with eight submissions agreeing with the perspectives of the Accord Interim Report and four in disagreement:

*“While the Interim Report notes the centrality of international student education to the mission of the sector, and a primary source of revenue, it is equally positioned as crucial to Australia's soft diplomacy and regional development. The recognition given to the latter is acknowledged and appreciated, with our alumni and institutional partnerships supporting and underpinning foreign engagement at the national level. The contribution and commitment to building capacity in a range of critical areas across the Indo Pacific is an important aspect of our broader internationalisation activities.” – Griffith University. pg. 4*

One submission agreed with the positioning of international education as a component of Australia's soft diplomacy but cautioned the Panel against seeing international education as "less as an industry and more as a crucial element of Australia's soft diplomacy" (Accord Interim Report, pg.7). Instead they argued:

*"English Australia supports the panel's view that outcomes of the international education sector should include Australia's soft diplomacy, regional prosperity and development. However, it must be a central tenant to the review that International Education is currently Australia's 4th largest export sector. As such, people's livelihoods, both those who operate businesses within international education and those who benefit from the economic prosperity international brings to communities, depend on it and its success. It is an industry."* – English Australia submission. pg. 2

Dissenting submissions did so for a range of reasons. One argued that a shift to 'soft diplomacy' does not represent a deviation from Australia's current economic approach and instead suggests a different 'social justice' approach to international education:

*"Instead, we would like to see the Panel adopt a 'social justice' (Piller, 2016) approach to international education that values international students' diverse knowledges, ideas, cultures, and languages. Social justice perspectives focus on how to create a just and equitable society where the diversity that exists related to race, gender, ethnicity, language, sexual orientation and so on, does not unfairly impact access to resources and opportunities in life"* - Carly Steele submission. pg. 2

### **Ensuring the integrity and accessibility of visa pathways for international students was identified as important in submissions to support meet Australia's skills needs and maintain international reputation.**

Eight submissions agreed that visa pathways should be made more accessible to international students, and students pursuing post-study work rights. The explanation and approach to improving accessibility varied between submissions. Two submissions argued that increasing the volume of international students joining the Australian workforce is essential to Australia's ability to grow a skilled workforce at the necessary rate:

*"To enable Australia to most greatly benefit from the international students that study in Australia, and wish to stay and contribute to our workplaces and community, the integrity and accessibility of visa pathways for international students is fundamental. For Australia to continue to grow a skilled workforce at the rate it aspires to, to be a world leader in industries that are globally competing for talent, there is a need to increase the number of domestic and international students that are graduating and importantly securing roles in our workforce."* - The Department of Industry, Innovation and Science submission. pg. 6

Similarly, in order to fill shortages across key professions Cooperative Research Australia (pg. 5) proposed developing clear migration pathways and sustainable career opportunities for international students. Chartered Accountants Australia and New Zealand (pg. 17) advised the government to "extend the indicative list of eligible occupations for post-study work rights in Australia to include accounting and audit and update the list of related qualifications eligible for the extension to include degrees in Accounting".

One submission provided specific advice for how to improve the accessibility of visa pathways by moving to digital English competency testing:

*"We believe that a digital testing pilot, run by the Department of Home Affairs (the Department) and administered consistently across a specific cohort of university student visas, would go a long way towards addressing the issues referred to in this submission, proving the validity of the digital English testing model in the Australian context, and fulfilling the Accord's vision for Australia's future in higher education."* – Duolingo submission. pg. 7



Two submissions expressed caution that improved student visa pathways for international students could be used to “distort the process of immigration policy and open the way for queue jumping (Denis Blight. pg. 2).

## Serving our communities

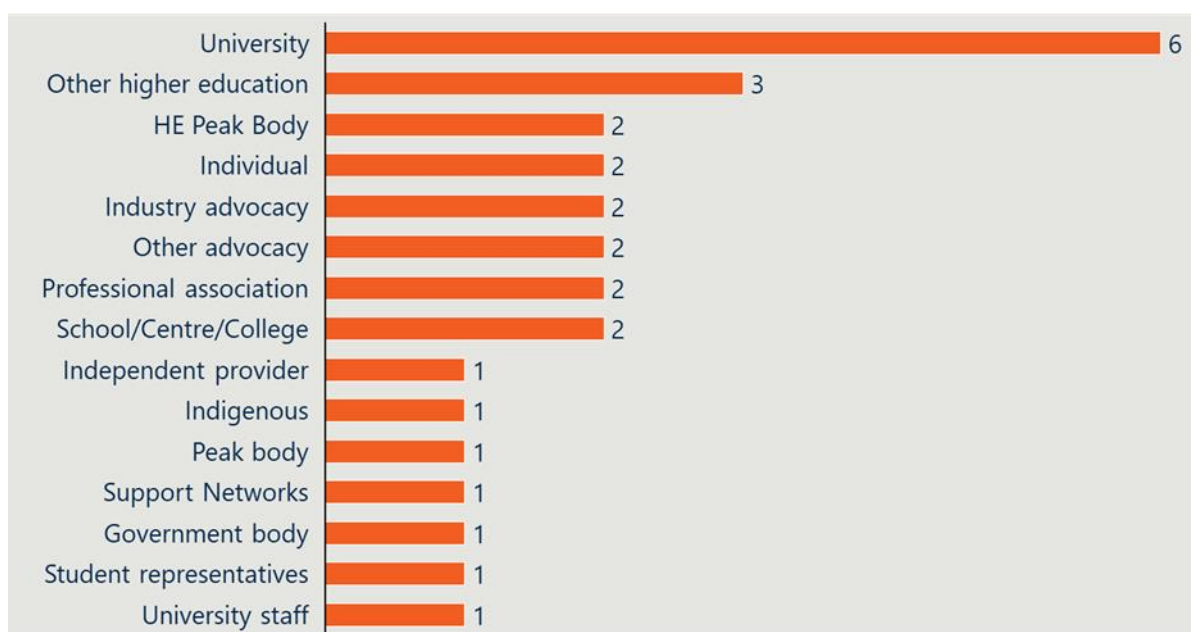
The Accord Interim Report notes “As Australia’s higher education systems grow, so does their importance to their local communities... Community engagement is a central part of university missions, and the Review considers this should be better recognised and sufficiently resourced” (p. 97). The importance of their communities was recognised, for example:

*“Local universities must continue to be seen as part of our local community if we are to attract and retain the students needed to meet our future workforce requirements. At the same time, we need to ensure any potential outcome does not result in the centralisation of services that would result in job losses in regional areas. Universities are a major employer in the regions and the loss of staff would have a devastating impact on local economies and further deterioration of our skilled workforce.” – Central Queensland University submission. pg. 57*

Twenty-eight submissions (9 per cent of submissions) directly addressed Accord Interim Report considerations around serving our communities (Refer Figure 8):

- Submissions argued that higher education institutions should recognise and document their relationship with the community. (10 submissions)
- Submissions encouraged higher education to develop closer ties with local industry and stakeholders to support community development efforts. (9 submissions)

**Figure 8 | Distribution of submissions by respondent category that addressed serving our communities<sup>9</sup>**



### Submissions argued that higher education institutions should recognise and document their relationship with the community.

Ten submissions supported the importance of recognising and formalising the role of universities in their communities through mission-based accords or other funding agreements:

<sup>9</sup> The Other category includes all anonymous submissions and submissions which do not align to another listed category.

*“A university’s location and the places of its communities are critical to the role that governments and these communities expect it to play. These roles should be explicitly recognised in university mission-based accords and funding arrangements should recognise and support them.” – Australian Technology Network of Universities submissions. pg. 15.*

## **Submissions encouraged higher education to develop closer ties with local industry and stakeholders to support community development efforts.**

The importance of close collaboration with industry was mentioned by nine submissions. For example:

*“Close relationships with local industry allow for the development of employment pipelines and upskilling opportunities to meet the employment and skills needs of the local area.” – Engagement Australia submission. pg. 3*

While many submissions did not directly suggest how close relationships could be developed, Regional University Centres were mentioned in other elements of 38 submissions. Aged and Community Care Providers Association noted their importance to ensuring workforce availability in regional areas:

*“The introduction of further Regional University Centres could also play a key role in addressing workforce shortages in regional, rural and remote areas. Regional and remote communities have difficulty training and retaining nurses, and as a result many aged care services in these areas are heavily reliant on agency staff. Regional University Centres could encourage more students to remain in their community and obtain employment locally after completing their training which could help to build a sustainable aged care workforce in regional and remote areas.” – Aged and Community Care Providers Association submission. pg. 3.*

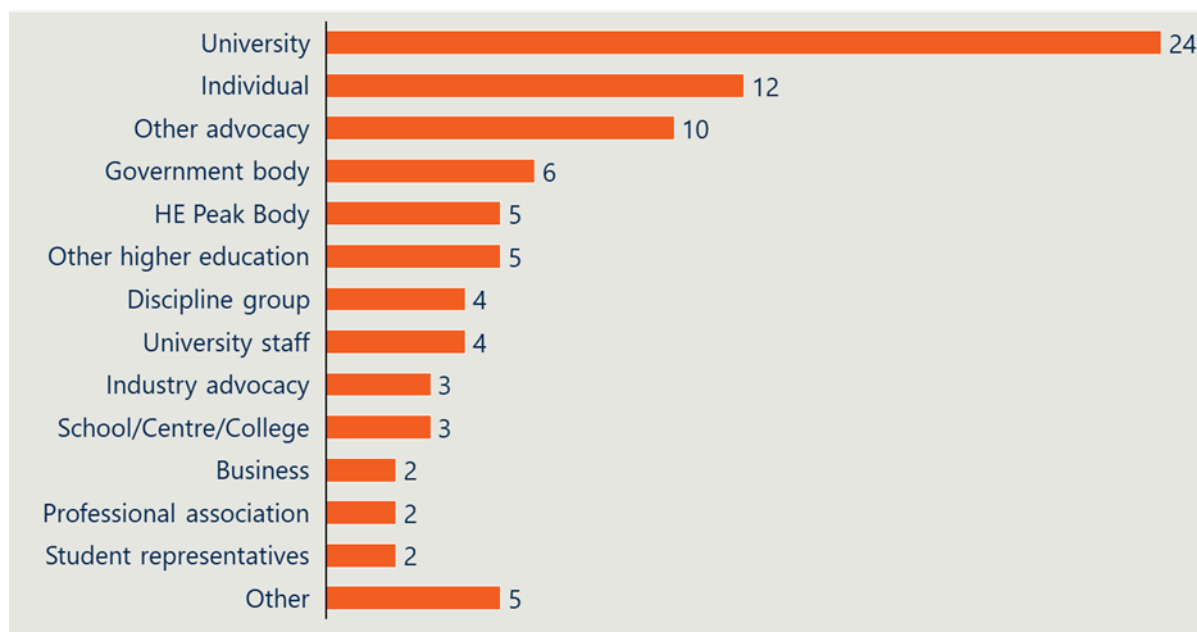
## Research, innovation and research training

The Accord Interim Report notes that “The research strength of our universities should be protected and increased”, and that “mechanisms for sharing and translating university research should be improved significantly” (p.106). Research has been a regularly referenced topic across each of the submissions processes for the University Accord, 86 submissions in response to the Terms of Reference, and 104 submissions (34 per cent of submissions) in response to the Discussion Paper.

Australia’s research, innovation and research training capacities was one of the most frequently addressed topics across the submissions to the Accord Interim Report, being included in 87 submissions (27 per cent of submissions) (Refer Figure 9):

- Sufficient funding for research, support for the ARC, capacity to deliver research towards Australia’s national priorities, improving research measurement and sufficient infrastructure funding were identified as priorities by submissions. (76 submissions)
- Increasing PhD stipends and creating research training targets for equity and regional groups were recommended to improve the research training system to support and attract student to research careers. (20 submissions)
- Continuing support for university end-use collaboration programs and increased collaboration between research organisations and industry were recommended to improve the sharing and translation of research. (34 submissions)

Figure 9 | Distribution of submissions by respondent category that addressed research, innovation and research training<sup>10</sup>



<sup>10</sup> The Other category includes all anonymous submissions and submissions which do not align to another listed category.

## Sufficient funding for research, support for the ARC, capacity to deliver research towards Australia's national priorities, improving research measurement and sufficient infrastructure funding were identified as priorities by submissions.

Sixty-seven submissions included discussions on how to protect Australia's research fundamentals. In response to the Accord Interim Report:

- Submissions discussed developing a funding mechanism that recognises the importance of research, including better coverage of the full costs of research by National Competitive Grants. (44 submissions)
- Increased investment to the Australian Research Council in the near-term was identified as potential mechanism to support research. (5 submissions)
- Submissions noted that Australia's capacity to meet national research priorities would be supported by increasing research expenditure to the OECD average and exploring innovative funding streams. (18 submissions)
- Improving the measurement of the quality and impact of Australian research was noted as important for the long-term success. (13 submissions)
- Submissions urged the panel to ensure NCRIS and ongoing research infrastructure investment is sufficient to maintain Australia's position as a world-class nation for research. (9 Submissions)

## Submissions discussed developing a funding mechanism that recognises the importance of research, including better coverage of the full costs of research by National Competitive Grants.

Forty-four submissions discussed the need to develop an improved funding mechanism for research, innovation and scholarship and commented on the need for National Competitive grants to cover the full cost of research. Twenty submissions agreed that the government should commit to covering a greater proportion of indirect research costs. These submissions provided varied perspectives on the level of indirect costs that should be covered, along with, how this should be achieved. Eleven proposed a commitment of 50 cents to cover indirect costs for every dollar of competitive funding provided:

*"Increased funding from government will alleviate the current dependence on international student revenue, enabling research sector sustainability. [...] This is best achieved through a whole-of-government approach that shares the burden, commencing with all Australian Government agencies committing to providing at least 50 cents of indirect funding for every \$1 of direct funding they grant. UA estimates the associated cost of this measure would be up to approximately \$3.5 billion over four years across the whole of government (to 2027-28), depending on timing and staging. This is the minimum requirement to maintain Australia's research capability." – Universities Australia. pg. 6.*

A submission that agreed with this proposal stressed the importance of covering indirect costs in the near-term:

*"The initial discussion was for the Accord to include an increase from the current 28 cents per dollar to 50 cents per dollar. This does not appear in the Interim Report. I would like to ask that this element is included in the Priority Actions in the Final Report of the Australian Universities Accord." – Massimo Hillard. pg.1*

Five submissions observed that a national strategy is necessary in order to achieve full-cost research funding. Two of these proposed that the Accord presented an opportunity for the government to reach agreements with universities on the level of funding it would provide for indirect costs:

*“Part of the reason for this failure [to achieve full cost funding] is that these goals have never been embedded in a national plan. The first step in achieving full cost funding for research is to develop a national, multi-sector strategy that commits to achieving full cost funding for university research projects within ten years.” - Charles Sturt University. pg. 17*

Three submissions addressed changes to block grants to address a range of funding deficiencies. The National Tertiary Education Union (pg. 6) proposed that all research should be fully funded at the block grant level to minimise reliance on short-term grants, while Science and Technology Australia (pg. 4) suggested that the budget allocation for research block grants be doubled in areas of research priority to strengthen research foundations. Tom Stace (pg. 4) proposed establishing an innovation block grant to reward and incentivise universities to focus on the creation of successful startups.

One submission noted the importance of providing a “sustainable and diversified portfolio of research supports beyond the limited number of grants currently present in the Australian research landscape” (pg. 3). They flagged the need to:

*“review the component parts of the National Competitive Grant Program (NCGP) re-framing the one-size-fits-all approach. Specifically, we are calling for: the introduction of discipline or cluster programs and lower funding limits, and incentivising more multi-disciplinary research between STEM and SHAPE.” - Australian Academy of Humanities. pg. 3-4*

### **Increased investment to the Australian Research Council in the near-term was identified as potential mechanism to support research.**

Five submissions agreed with the proposal to increase investment in the Australian Research Council. The University of Sydney argued that an immediate increase in ARC funding investment is “required to address the major structural problems in research funding and to strengthen and de-risk our sovereign research capability over the long-term.” (pg. 2) Science and Technology Australia proposed doubling Australia’s investments in the ARC competitive grants budget and developing ARC funding streams to deepen partnerships with First Nations communities.

### **Submissions noted that Australia’s capacity to meet national research priorities would be supported by increasing research expenditure to the OECD average and exploring innovative funding streams.**

Eighteen submissions argued the importance of ensuring that Australia’s expenditure on research and development reaches the OECD average, with a target expenditure at 3 per cent of gross domestic product. Seven submissions flagged concerns that “Australia’s total funding across the R&D sector at approximately 1.68% of Australia’s GDP (Australian Bureau of Statistics 2023). This figure is well below the most recent OECD average of 2.67% of GDP” (Australian Academy of Technological Sciences. Pg. 2). Five submissions flagged that increasing expenditure on research to avoid universities needing to cross-subsidise research funding from elsewhere:

*“There is a need to transition [...] to having research and development investment of at least the OECD average. Funding for research in universities should not be reliant on international student fees, a risk highlighted during the pandemic. University of Canberra advocates for a strengthened base block grant for each university to provide stability and facilitate longer-term research planning and investment.” – University of Canberra submission. pg. 3*

Two submissions proposed that the Accord consider how to address the disproportionate distribution of funding between regional universities and large metropolitan universities:

*“avoid any proposals that limit access to research funding to only a portion of universities, for example allocating research funding through a Group of Eight (Go8) filter [...]. [...] almost half of all research funding and expenditure now occurs in non-Go8 universities. The Australian research landscape benefits from the diversity of research across our universities and this also benefits our students and our communities. – Flinders University submission. pg. 3*

Two submissions suggested exploring funding mechanisms that leverage private and industry investment to fund university research:

*“There is a need for legislation to further support joint public-private research investment funds that can support Australian researchers and the community, potentially freeing ARC Linkage funding for other ARC schemes.” – The Council for Humanities, Arts and Social Sciences submission. pg. 2*

### **Improving the measurement of the quality and impact of Australian research was noted as important for long-term success.**

Thirteen submissions agreed with the need to improve the measurement of the quality and impact of Australian research, including some submissions that identified key areas of Australia’s research data capabilities, which require improvement. Three submissions focused on the need to improve current methods of collecting data on researchers and their research. The Australian Council of Graduate research proposed developing data collection mechanisms for the research outputs of HDR programs to demonstrate program value (pg. 3). The Australian Research council suggested employing:

*“A modern data-driven approach with expert review requires smarter data-harvesting to enable reduced reliance on manual allocation of research outputs and protracted traditional peer review of both traditional and non-traditional research outputs. We are beginning this work with a data stocktake to broaden our understanding of the data available [...], how it can be used to understand quality and impact, and what further data development may be required to deliver more robust evaluations to meet government and sector needs.” – Australian Research Council submission. pg. 3*

Macquarie University advised looking at emerging international research performance assessment methods:

*“Internationally, there is growing momentum to reform the assessment of research performance. Movements and organisations at the forefront of these reforms include: The Declaration on Research Assessment; the Coalition for Advancing Research Assessment; and the Research on Research Institute. [...] These movements and organisations advocate placing less emphasis on blunt metrics to assess researchers and research quality.” - Office of the Deputy-Vice Chancellor (research) submission. pg. 2*

### **Submissions urged the panel to ensure NCRIS and ongoing research infrastructure investment is sufficient to maintain Australia’s position as a world-class nation for research.**

Nine submissions agreed with the need to ensure long-term funding is provided to NCRIS and investment in critical research infrastructure more broadly. Four submissions flagged the need to improve and maintain research infrastructure in regional locations:

*“Providing learning and research infrastructure in the regions, which can support both local communities and every level of education. For example, the Victorian Government’s Tech School investment has leveraged additional funding from industry and universities in many of Victoria’s key*

*regional centres, focused on building the skills of school students aligned to key priority growth areas.” – Federation University submission. pg. 8*

Five submissions made other suggestions pertaining to NCRIS. Three submissions agreed with the proposal to ensure long term funding:

*“Renew a ten-year investment commitment to Australia’s large-scale research infrastructure in NCRIS and lift base funding for each NCRIS facility to combine operational and capital expenditure. [...] Secure funding for the individual NCRIS facilities to prevent the loss of highly skilled specialist talent by renewing funding agreements at least two years from the end of their funding contracts.” – Science and Technology Australia submission. pg. 4*

The Australian Academy of the Humanities (pg. 4) supported providing NCRIS with more sustainable footing but expressed concerns that historically NCRIS funding “has under-invested in humanities, arts and social sciences infrastructure, and Indigenous research and data capability.”

## **Increasing PhD stipends and creating research training targets for equity and regional groups were recommended to improve the research training system to support and attract student to research careers.**

Twenty submissions included discussions on improving the research training system to support and attract students to research careers. In response to the Accord Interim Report:

- Submissions indicated strong support for increasing PhD stipend rates and encouraging changes to the taxation of research training scholarships. (17 submissions)
- Submissions supported creating research training targets for equity and regional groups. (5 submissions)

## **The submissions indicated strong support for increasing PhD stipend rates and encouraging changes to the taxation of research training scholarships were recommended by submissions.**

Increases to PhD stipend rates and encouraging changes to the taxation of research training scholarships was included in 17 submissions. Fifteen submissions agreed with increasing PhD stipend rates, with varying levels of specificity. Four submissions argued that the stipend should be increased to the level of a living or minimum wage. Universities Australia proposed an increase to \$35,000 annually by 2025. Another agreed that an increase was necessary to incentivise prospective research students:

*“The lack of financial security is a disincentive for prospective students to undertake further study, with many seeking to enter the workforce and earn a salary rather than face the prospect of juggling both further studies and part-time work for uncertain job prospects after completion. Paying a living wage may increase the talent pool of students undertaking postgraduate studies and could lead to studies being completed faster and to a higher standard.” – Defence Science and Technology Group submission. pg.6*

Two submissions pointed out that while an increase to the PhD stipend rate is necessary, it is also important to ensure that the number of students funded remains the same or is increased.

Four submissions agreed with the proposal to adjust taxation to make part-time and industry linked research scholarships tax free. Macquarie University (pg.4) argued that such a change would better “support equity groups and encourage collaboration with industry.”



## Submissions supported creating research training targets for equity and regional groups.

Five submissions agreed with the proposal to create research targets for equity and regional groups, with a focus on First Nations students and students from low-SES backgrounds. Another called for the government to prioritise programs that support indigenous research and identified some key challenges:

*"More needs to be done to support First Nation Higher Degree by research (HDR) students to pursue research degrees. Low completion rates in undergraduate degrees, low funding for stipends for what is often a mature-age cohort, and a lack of appropriate mentorship and supports are all contributing factors."* – Universities Australia submission. pg. 6

Macquarie University also agreed with the proposal and identified limitations of current incentives for First Nations research:

*"Although incentives to ensure the success of First Nations HDR candidates already are built into the RTP formula, additional funding returned through the block grant is delayed significantly from time of completion. This does not adequately fund universities to develop and deliver required support systems to scaffold the success of members of equity groups. To enable universities to meet targets for equity groups, we recommend increased funding for effective support mechanisms."* – Macquarie University submission. pg. 7

## Continuing support for university end-use collaboration programs and increased collaboration between research organisations and industry were recommended to improve the sharing and translation of research.

Thirty-four submissions included discussions on the better sharing and translation of research. In response to the Accord Interim Report:

- Submissions supported continuing support for university end-used collaboration programs, including improvements to the R&D tax incentive and cooperative research centres. (12 submissions)
- Submissions recommended that government become an exemplary user of university research and explore mechanisms to remain informed on research priorities and capabilities. (5 submissions)

## Submissions supported continuing support for university end-used collaboration programs, including improvements to the R&D tax incentive and cooperative research centres.

Twelve submissions responded to the Accord Interim Report's proposal to continue support for university end-user collaboration programs, with a specific focus on the value of the R&D tax incentive (11 submissions) and cooperative research centres (four submissions). Of the nine submissions that agreed with improved support through the R&D tax incentive, four explicitly agreed with:

*"the proposal to implement the proposal in the Ferris, Finkel, Fraser Review of R&D Tax Incentives (2016) to 'Introduce a collaboration premium of up to 20 percent for the non-refundable tax offset to provide additional support for the collaborative element of R&D expenditures undertaken with publicly-funded research organisations.' Such a premium would also extend to employing STEM PhD graduates."* – Griffith University submission. pg. 3

One submission expressed support for initiatives like the R&D tax incentive, but flagged its limited impact on encouraging investment:

*"The R&D Tax Incentive (RDTI) remains the single largest form of Government R&D funding and the primary mechanism through which it aims to drive private sector research. Clearly, this is just not working: despite this investment, business expenditure on R&D (BERD) has declined since 2008 and sits well below the OECD average."* - University of Melbourne submission. pg. 4

Two submissions expressed concern that a focus on indirect funding through avenues like the R&D tax incentive would contribute to a move away from direct funding pathways for research:

*"Swinburne calls for an end to high levels of indirect investment in R&D – such as through the R&D Tax Incentive – to be replaced by direct funding of industry R&D. Research needs to be fully funded, nationally prioritised and separated from the political cycle or grant funding, all while creating a robust, fluid market for researchers to feel secure enough to move around in."* – Swinburne University submission. pg. 3

### **Submissions recommended that government become an exemplary user of university research and explore mechanisms to remain informed on research priorities and capabilities.**

Five submissions agreed with the Accord Interim Report that government should become an exemplary user of university research to address national priorities:

*"There is potential for government to make more use of university research, especially in areas of public policy. As the IR notes (p. 98), this should happen more commonly than it currently does. Also, a greater awareness of the relevance of university research to industry, business and communities would be beneficial (IR, p.98). The establishment of government advisory committees on education, mentioned previously, is a welcome step in this direction."* - Independent Scholars Association of Australia submission. pg. 5-6

Another submission agreed, arguing that academic consulting could be better leveraged to support government research utilisation:

*"ATN recommends that the Panel encourage government to become an exemplary user of university research. There are strong arguments to support greater levels of academic consulting, in particular to supplement public sector capability and support the independent review of government policy and programs."* - The Australian Technology Network of Universities submission. pg. 16

Three submissions agreed that it is necessary for government to remain informed about national research priorities and capabilities:

*"A whole of government approach, with clear, national goals is required to focus the research carried out by universities to be in the nation's best interest."* - University Chancellors Council submission. pg. 3

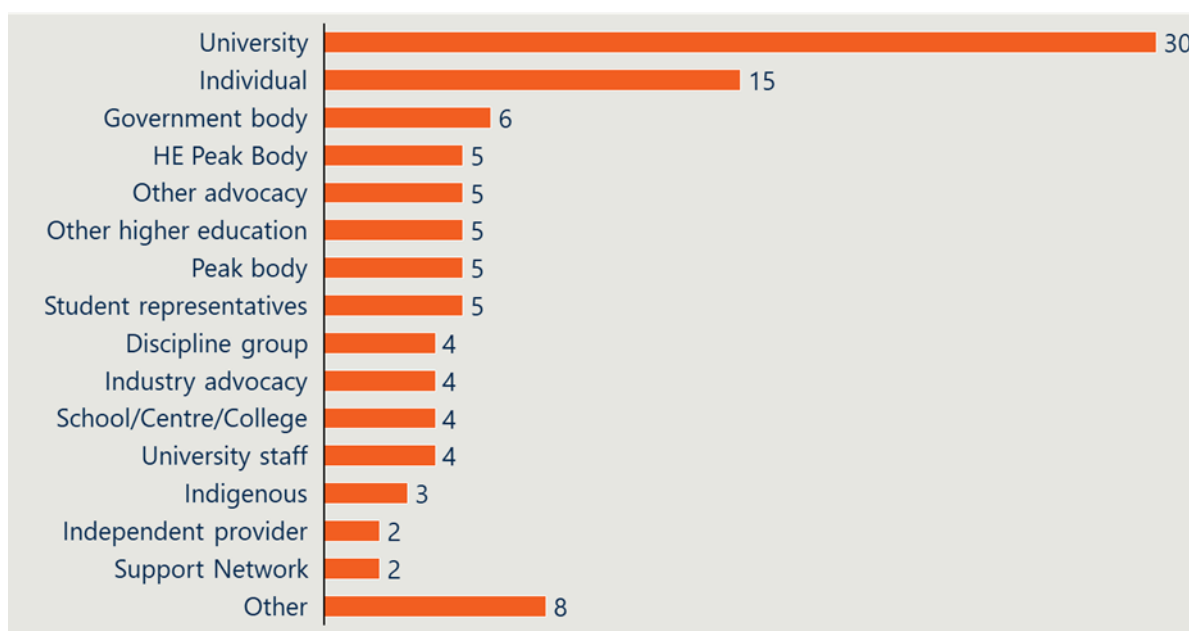
## National governance towards a coherent tertiary system

Submissions largely agreed with the Accord Interim Report’s contention that “Higher education is likely to need stronger planning and analytical capability, and more collaborative mechanisms to build complementary and differentiated institutions” (pg. 117). Governance has been a commonly referenced topic throughout each submission process for the Universities Accord, receiving 212 in response to the Terms of Reference (shared across section 3.2), and 53 submissions (17 per cent of submissions) in response to the Discussion Paper.

Submissions responding to the Accord Interim Report, included 107 submissions (33 per cent of submissions) (Refer Figure 10):

- The establishment of a national Tertiary Education Commission (TEC) was broadly supported by submissions. (75 submissions)
- A National Regional University, new models for collaboration and new specialised institutions were considered as part of potential structural changes across the tertiary education sector. (49 submissions)
- Maintaining the unique value provided by higher education and VET and the potential of self-accrediting dual sector providers were identified as considerations when establishing a more aligned tertiary education system. (22 submissions)

Figure 10 | Distribution of submissions by respondent category that addressed national governance towards a coherent tertiary system<sup>11</sup>



<sup>11</sup> The Other category includes all anonymous submissions and submissions which do not align to another listed category.

## The establishment of a national Tertiary Education Commission (TEC) was broadly supported by submissions.

75 submissions discussed the establishment of a Tertiary Education Commission and considered what role it should play in the leadership of a national tertiary education system. In response to the Accord Interim Report:

- Submissions agreed with the importance of a clearly defined mandate for the TEC and minimisation of its contribution to administrative burden. (19 submissions)
- Submissions agreed with the Accord Interim report that the TEC should operate independently of sector stakeholders, including government, and leverage expert advice. (15 submissions)

### Submissions agreed with the importance of a clearly defined mandate for the TEC and minimisation of its contribution to administrative burden.

Nineteen submissions agreed with the importance of establishing a clearly defined mandate for the TEC and minimisation of its contribution to administrative burden. Five submissions advocated for an approach centred on setting long term goals for the sector and operating in an advisory capacity. Similarly, seven submissions agreed with the Accord Interim Report to recommend that the TEC focus on delivery of Accord promises and monitor progress of mutually agreed deliverables. One submission suggested a number of operating principles, which included:

1. *"Managing and monitoring the implementation of the Accord"*
2. *"Focus would be the health of the higher education system as a whole"*
3. *"Provide advice to governments on funding priorities, opportunities, gaps, and drivers"*
4. *"It would have a limited pool of funding to support strategic initiatives such as achieving equity goals or maintaining provision of strategically important but low enrolment or otherwise unviable subjects (e.g. regional languages)."*
5. *"Regulation, including standard setting, would remain the role of TEQSA."*  
– Charles Sturt University. pg. 21

Twelve submissions advocated for the TEC to protect and promote student voices, with six endorsing the appointment of an equity commissioner to oversee the improvement of First-Nations student access, participation and outcomes. Equity practitioners in Higher Education Australasia recommended that the equity commissioner *"Develop a National Student Equity Strategy, building cross-government partnerships across the entire education ecosystem"* (pg. 1). Additionally, the Australian Medical Students Association recommended the appointment of a Disability Education Commissioner within the TEC.

Four submissions argued that the TEC could play a pivotal role in dismantling the barriers between higher education and VET. This could be accomplished by supporting the alignment of higher education with vocational pathways (one submission) and encouraging collaboration to ensure that tertiary education pathways are mutually supportive (one submission). TAFE Directors Australia cautioned against the TEC focussing too heavily on higher education initially at the risk of *"sidelining TAFE as the perpetual 'poor cousin' to universities, in contradiction of efforts towards a more aligned tertiary sector."* (pg. 8)

A proposed role for the TEC as a pricing authority for Commonwealth funding was contested, with two submissions supporting the proposal and two expressing disagreement. Monash University agreed that the TEC could support the sector with *"strategic development planning and distribution of funding"* (pg. 4). Other submissions argued that the TEC should not have a role in funding distribution due to the increased administrative burden this could create for providers.

Five submissions expressed hesitancy, outlining concerns that a commission that does not have a clearly articulated purpose could experience mission creep (three submissions), and that existing bodies could be utilised to fill the same role (two submissions).

A core concern of 11 submissions was that the TEC could lead to more bureaucracy, substantially increase administrative burden and inhibit the autonomy of the sector. Within this group, five submissions argued that the future role of the TEC should be decoupled from creating or enforcing regulation and four argued that the commission should exist only in a research and policy advisory capacity for key sector stakeholders:

*"The TEC could contribute to the increasing bureaucratisation of the higher education sector and could undermine institutions' independence. Universities must retain significant degrees of autonomy which is vital to their dynamism and core to their function, but that is very much at risk in an overly bureaucratized TEC." - Australasian Council of Dean of Arts, Social Sciences and Humanities submission. pg. 16*

A submission from the University of Divinity (pg. 3) suggested that the TEC only engage with providers that receive or wish to receive Commonwealth funding.

### **Submissions agreed with the Accord Interim report that the TEC should operate independently of sector stakeholders, including government, and leverage expert advice.**

Fifteen submissions agreed broadly with the Accord Interim Report that the TEC should operate independently of government and tertiary institutions while representing the interests of key sector stakeholders:

*"The TEC would need a clear and consistent set of policies and procedures, approved by an independent Board, to ensure that the way it operates is not unduly influenced by the personal perspectives of individual CEOs/Director Generals. The Commission would need to win and keep the trust of both Government and the sector – no small feat." – Murdoch University submission. pg.2*

Four submissions expressed that an independent TEC should *"reflect the breadth and diversity of the higher education sector"* (Charles Sturt University, pg. 21). A further four submissions highlighted the potential for the TEC to provide an avenue for academics and disciplinary experts to have input into sector development. One reflected that it, and other similar bodies, are uniquely placed to make contributions to the TEC:

*"ATSE, along with the other Learned Academies, would be well placed to contribute to such a body to inform national coordination and planning – allowing the TEC to draw on a range of independent expert voices within and across disciplines." – Australian Academy of Technological Sciences and Engineering submission. pg. 1*

A further two submissions expressed enthusiasm for the TEC to test new ideas, investigate innovative solutions and provide advice to government independent of stakeholder interests.

### **A National Regional University, new models for collaboration and new specialised institutions were considered as part of potential structural changes across the tertiary education sector.**

Forty-nine submissions included discussions of the need to promote structural changes throughout the tertiary sector, along with how these changes should be actioned. In response to the Accord Interim Report:

- Feedback from submissions on the merits of a new National Regional University as Australia's second national university was mixed. (24 submissions)
- Submissions urged the panel to continue to explore innovative models and collaboration opportunities to improve service provision in regional areas. (13 submissions)
- Options to facilitate the emergence of specialised institutions and revisions to existing provider category standards were considered. (22 submissions)

### **Feedback from submissions on the merits of a new National Regional University as Australia's second national university was mixed.**

The proposal to establish a new National Regional University was directly addressed by 24 submissions and received mixed feedback. Five submissions agreed to the proposal in principle, but called out a number of additional considerations:

- The need to identify substantial additional benefits beside efficiency gains. (William Billingsley. pg. 2)
- Continued difficulties offering a comprehensive list of courses to regional students. (Phillips KPA. pg. 1)
- Substantial additional funding requirements. (Australian National University. pg. 8)

Nine submissions disagreed with the proposal, five of which argued the importance of close connection between regional universities and their communities:

*"Regional universities are closely entangled with their communities, providing local access to skills development and research capabilities that support regional diverse workforce and economic development. They are major employers in their region and deliver research and education programs that are of benefit in their local region, as well as more broadly in Australia. Amalgamation and integration type strategies can work either deliberately or inadvertently to disrupt local identity and branding affecting local community relationships, regional employment options and the capacity of regional universities to attract and ideally retain domestic and international students to our regions."* – University of Southern Queensland submission. pg. 8

Four submissions expressed concern that the proposal could lead to a "hollowing out" (Charles Sturt University, pg. 8) of regional education capabilities and instead suggestions could be better spent providing support to established regional institutions.

As one submission argued:

*"We do not believe the case has yet been made for pursuing a National Regional University. Instead, we contend that there are opportunities to address some of the longstanding challenges by a mixture of new policies and funding models that better support regional universities and identifying place-based solutions that reimagine existing regional university campuses where it makes sense to do so."* – University of the Sunshine Coast submission. pg. 3

Additionally, three submissions pointed out that while the Accord Interim Report states that "to date, no study has been conducted to investigate the appropriateness of a single university model for regional areas" a feasibility study on this topic was published in July 2009 by Phillips KPA. The study identified numerous challenges to the implementation of a National Regional University and captures many submission perspectives.

## Submissions urged the panel to continue to explore innovative models and collaboration opportunities to improve service provision in regional areas.

All 13 submissions agreed that new models for delivering high quality teaching and research in regional areas should be investigated. Submissions provided a number of suggested models for the panel to consider. These suggestions included:

- Provide further investment for country university centres and regional study hubs, and consider the establishment of hubs for specific disciplines. (Council of Deans of Nursing and Midwifery. pg. 10)
- Investigate the Geraldton University Centre and partnership model as a more robust alternative to other regional university centre models. (Geraldton Universities Centre. pg. 2)
- Leverage existing regional TAFE facilities when creating additional regional study hubs or other regional tertiary infrastructure. (TAFE Directors Australia. pg. 9).

The importance of institutional collaboration to improve learning and research in regional areas was mentioned by four submissions:

*“Providing comprehensive support for RRR low-SES students will increase student academic achievement while reducing rates of departure intentions and dissatisfaction (Radloff & Coates, 2010). One approach to achieve this is through ‘institutional cross-collaboration and partnerships, including sharing the use of facilities and resources’ with local community organisations (Bradley et al., 2008, p. 111). Communities will also benefit from university partnerships with local organisations.”* – Friends of Libraries Australia submission. pg. 5

Additionally, two submissions supported novel approaches to collaboration and encouraging funding from industry and private organisations to improve regional education access.

## Options to facilitate the emergence of specialised institutions and revisions to existing provider category standards were considered.

Discussion of facilitating new kinds of research or teaching institutions and amending provider categories to encourage institutional diversity was discussed in 22 submissions. Eight submissions argued in favour of research or teaching specialised institutions with varying levels of specificity. Of these eight, three advocated for more investment in the opportunities provided by University Colleges:

*“Implement policy settings that realise the capacity of the University College category including through amending the Higher Education Support Act 2003, enabling students who are studying with University Colleges in areas of skills shortage to access CSP funding.”* – Navitas submission. pg. 6

Other submissions proposed potential institutional structures, which focus more heavily on teaching and vocational training:

*“A high level vocational approach as a genuine alternative to the more academic approach of universities. We are envisaging a tertiary institution, focused on teaching and practice, delivering VET certificates, diplomas and bachelor degrees, possibly applied masters degrees. Ideally there would be pathways from certificates to diplomas to degrees.”* – Mackenzie Research Institute submission. pg. 3

Thirteen submissions responded to the proposal to explore revisions to the Provider Category Standards to remove the requirement that universities carry out research. Responses were mixed with four in agreement, six disagreeing and two arguing that further investigation is required.

Submissions in agreement with the proposal recognised the potential of the revision to improve the institutional diversity of the Australian tertiary education sector:

*"... the solution to achieving greater provider diversity lies partly in reducing the research scale and quality requirements that were introduced to the Higher Education Provider Category Standards in 2021."* – The University of Sydney submission. pg. 3

Another submission suggested specific revisions to the Provider Category Standards to encourage the establishment of University Colleges:

*"We request the Panel to consider whether the current requirement under the Threshold Standards for a Greenfield applicant in the University College category is appropriate [...]. It seems anomalous that the Greenfield application process is a legislated avenue, yet the standard to be met is to have realistic and credible plans to comply fully with the 'Australian University Category' within 10 years"* – New Medical Education Australia submission. pg. 2

Dissenting submissions provided a range of arguments against the proposed revision. Three argued that a strong link between universities and research is core to their identity and function. Other opposing submission responses included decoupling universities from research might undermine the research capabilities of regional universities.

*"The introduction of specialisation will create a tiered higher education system."* – National Tertiary Education Union submission. pg. 3

## **Maintaining the unique value provided by higher education and VET and the potential of self-accrediting dual sector providers were identified as considerations when establishing a more aligned tertiary education system.**

Twenty-two submissions included discussions of how to encourage greater alignment between higher education and VET providers. In response to the Accord Interim Report:

- Submissions encouraged the sector to move towards greater alignment of higher education and VET while maintaining the unique value of both. (22 submissions)
- Submissions identified that self-accrediting for dual sector higher education providers, and selected TAFEs who meet minimum thresholds in their VET operations, may be an option. (2 submissions).

### **Submissions encouraged the sector to move towards greater alignment of higher education and VET while maintaining the unique value of both.**

Facilitating greater alignment between higher education and VET has been a consistent point of discussion throughout the Accord submission analysis process. All twenty-two submissions agreed with this broad goal of the Accord and provided differing levels of specificity for how this should be achieved. The three most addressed benefits of greater alignment flagged by submissions included:

- Streamlined pathways for students to enter higher education while undergoing vocational training.
- Improved parity of esteem between the two sectors.
- Potential to establish new types of dual-sector qualifications which meet Australia's skills needs and provide students with greater choice.

A number of submissions provided suggestions for how to create greater alignment:

*"An aligned tertiary system envisaged by the Interim Report is strongly supported by CDU beginning with the implementation of the Noonan Review of the AQF (see CDU's first submission, p18-19).*



*Implementation would allow the consolidation of AQF to eight levels, and address issues of reclassification, such as raising Certificate III apprenticeships and strengthening industry and professional PhDs.” – Charles Darwin University submission. pg. 3*

Another submission argued for a reduction in regulatory requirements for dual-sector providers:

*“streamlining the regulation of dual-sector providers to reduce the significant investment of administration required to meet the standards of both regulating bodies such as TEQSA and ASQA, including regulation across the two regulatory bodies for international students under ESOS Act and associated CRICOS registration.” – Department of Industry, Innovation and Science submission. pg. 7*

Four submissions argued that while they agreed with the goal, further analysis of the effects of greater interconnection between the sectors was required. Four submissions also argued that while greater alignment is necessary, it is crucial to maintain the unique differences of each sector:

*“...whilst encouraging permeability between VET and HE differences in the roles, functions, level of qualifications and delivery styles are recognised and that an HE paradigm is not universally imposed on VET. This needs VET qualified and experienced professionals on national policy making and funding bodies.” – Robin Shreeve submission. pg. 2*

One submission expressed concern that:

*“aligning too closely might lead to an apprenticeship-style model, potentially affecting the perception and value of university education programs.” – Council of Deans of Nursing and Midwifery (Australia and New Zealand) submission. pg. 9*

### **Submissions identified that self-accrediting for dual sector higher education providers, and selected TAFEs who meet minimum thresholds in their VET operations, may be an option.**

Two submissions argued that permitting dual-sector providers and selected TAFEs to self-accredit is of central importance to achieving parity of esteem between higher education and VET:

*“The facilitation of innovation requires greater flexibility in the design and funding of a broader variety of qualifications and courses. The ability of TAFEs to self-accredit will allow creativity in finding skilling solutions for industry. Greater parity of esteem and alignment, from a system perspective as well as the student and industry view, between TAFE and HE is essential. TAFE cannot achieve that parity of esteem if it does not have the same levers as universities and integral to that is the ability to self-accredit. Bringing TAFE and universities into a single regulatory environment of TEQSA will also enable that alignment.” – TAFE Directors Australia submission. pg. 2*

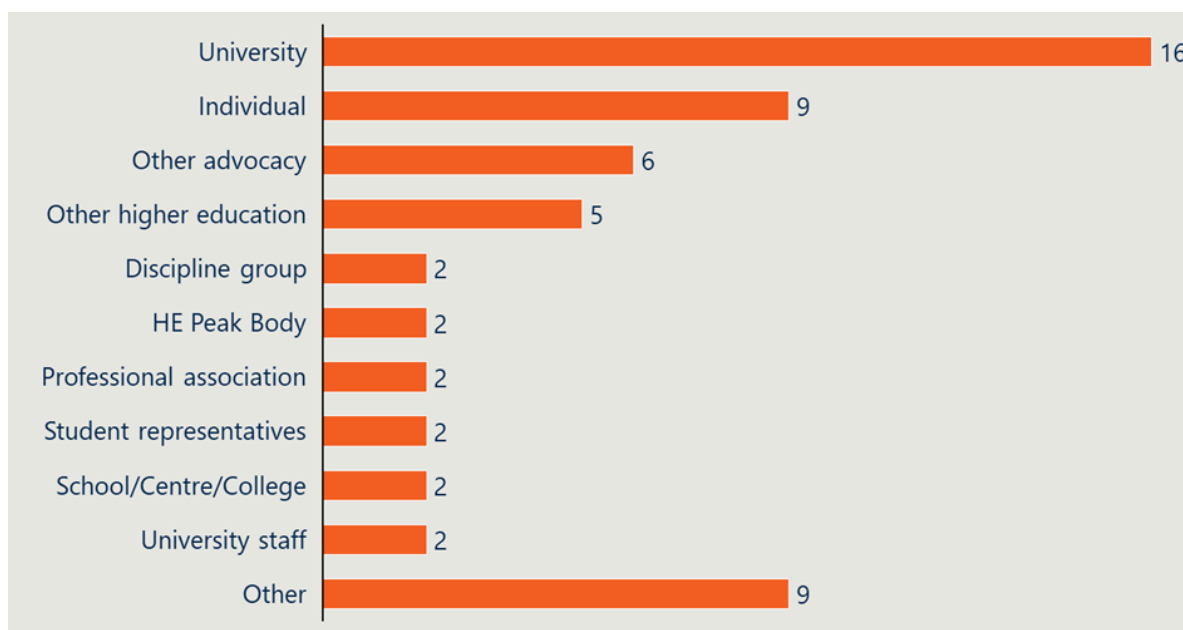
## Institutional collaboration and governance

The strengthening of institutional governance structures to address systemic issues throughout the higher education sector was addressed by 57 submissions (18 per cent of submissions) (Refer Figure 11). These submissions considered how best to improve student wellbeing and safety with a focus on sexual violence on campus and in student accommodations, improvements to staff workforce arrangements to improve safety and wellbeing, and improvements to institutional governing bodies.

Fifty-seven submissions responded to the Accord Interim Report's considerations for improved institutional collaboration and governance:

- Improving student wellbeing and safety and empowering students in decision making was a priority for some submitters. (32 submissions)
- Managing the casualisation of staff, staff workloads and professional development opportunities were identified as important to improve staff wellbeing. (20 submissions)
- Reducing the prevalence of corporate management practices in tertiary institutions was identified as an option to improve the operation of university governing bodies. (16 submissions)

Figure 11 | Distribution of submissions by respondent category that addressed institutional collaboration and governance<sup>12</sup>



### Improving student wellbeing and safety and empowering students in decision making was a priority for some submitters.

Thirty two submissions included discussions on improving student safety and wellbeing, including empowering students on matters that affect them. In response to the Accord Interim Report:

- Improving student safety and wellbeing as it relates to sexual, domestic and family violence remains a priority for submitters. (15 submissions)

<sup>12</sup> The Other category includes all anonymous submissions and submissions which do not align to another listed category.

- The establishment of a National Student Charter and strengthening the role of the Commonwealth ombudsman in student complaints received mixed responses in the submissions. (15 submissions)
- Providing a greater proportion of SSAF fees to student unions to ensure the support and representation of students received support from submissions, particularly students and student groups. (16 submissions)
- Data collection and distribution on student safety was identified as an important mechanism for improving student wellbeing. (7 submissions)

### **Improving student safety and wellbeing as it relates to sexual, domestic and family violence remains a priority for submitters.**

Improving student safety as it relates to sexual, family and domestic violence was the most commonly discussed systemic failure requiring changes to institutional collaboration and governance, with 15 submissions in agreement. Three submissions proposed the establishment of an independent regulatory body to oversee the prevention of sexual harm in universities:

*"...We have been involved in several research projects, contracted by the Commonwealth Government Department of Education, with the aim of strengthening respectful relationships and consent education across Australian states and territories. The research evidence indicates that respectful relationships and consent education is more likely to be effective when a whole-of-community approach is taken. For this reason, we propose that responsibility for overseeing universities' prevention of sexual harm – including sexual assault and sexual harassment (SASH) – be located in the TEQSA regulatory framework." – Kate Fitz-Gibbon submission. pg. 2*

Similarly, two submissions proposed the establishment of an expert-led campus sexual violence taskforce. The submissions emphasised the need for such a taskforce to be national in scope and independent from all institutions.

Three submissions proposed the establishment of a victim-survivor led advisory group. The group would act to guide the implementation of reform agreed to in the Accord Panel's final report:

*"Feedback indicated a need for more support for victim-survivors of sexual violence and domestic and family violence. Support services should be developed in partnership with victim-survivors. Sexual violence, domestic and family violence can be disruptive of university studies. Actions need to be taken to ensure students suffering from mental health challenges, or from sexual violence, domestic and family violence, are not penalised in their studies." – Dr Carina Garland MP. pg.2*

### **The establishment of a National Student Charter and strengthening the role of the Commonwealth ombudsman in student complaints received mixed responses in the submissions.**

Fifteen submissions agreed with the proposals to develop a national student charter and to strengthen the role of the Commonwealth Ombudsman in handling student complaints. Five submissions, which agreed with the creation of a charter, argued that the charter should focus on ensuring student safety and wellbeing. One submission listed a number of safety and welfare-oriented rights the charter should guarantee. These included:

1. *"Ensure Higher Education institutions have a responsibility to student safety and anti-discrimination on campus by imposing a Duty of Care."*
2. *"Ensure freedom of student & staff political expression."*
3. *"Ensure Disabled students are supported on campus by placing a positive duty to provide reasonable accommodations that do not cause unjustifiable hardship and empowering a Disability Education*

*Commissioner with the power to investigate and report on disability discrimination at all levels of education.”*

4. *“Ensure students have accessible reporting methods for sexual violence and other forms of violence that occur on campus.”* – The National Union of Students submission. pg. 12

Eight submissions agreed with the proposal to strengthen the role of the Commonwealth Ombudsman. Perspectives centred around the potential for the Ombudsman to create a better complaints process for students by improving process speed and coverage for both domestic and international students:

*“The student experience including safety must be addressed and some consideration should be given to a Higher Education Student Ombudsman. A specific Ombudsman is likely to be a more direct option for grievances and complaints, rather than to the Independent Commission Against Corruption, Australian Human Rights Commission or Equal Opportunities Commission, as is currently the case.”* – The University of Adelaide and University of South Australia submission. pg. 7

Two submissions disagreed with the proposal. Monash University (pg. 5) argued that *“appeals relating to state-registered public education institutions can be lodged with the relevant State/Territory Ombudsmen.”* End Rape on Campus (pg. 4) expressed concern around *“whether an Ombudsman function can deliver the improved and effective complaints system that students need to make complaints about the substantive decisions made by their university; and its capacity to deliver an appropriate trauma-informed response to student survivors.”*

### **Providing a greater proportion of SSAF fees to student unions to ensure the support and representation of students received support from submissions, particularly students and student groups.**

Sixteen submissions agreed with the proposal to increase the percentage of Student Service and Amenities fee provided to student unions. Submissions focused on the potential for student unions to ensure the empowerment, support and representation of students if provided with more funding through greater SSAF provision:

*“Student Unions are the primary body that their voice is carried through; they are run by students, for students, and are best informed and equipped to represent the interests and needs of the student body. Student organisations are run by students, for students, and are better equipped to represent the interests and needs of the student body. Returning SSAF to student organisations allows for greater representation and advocacy for students.”* – The National Union of Students submission. pg. 9

Three submissions argued for greater student representation in the bodies that determine SSAF allocation:

*“We submit that there should be an increase in direct representation of student interests in SSAF allocation. For instance, the University of Newcastle SSAF Advisory Group is currently constituted by 10 members, two members being students and only one of which is required for quorum. We propose that students should constitute 50% of SSAF Advisory Groups, and for there to be greater impartiality between the panel and the stakeholders bidding for SSAF funding. Increasing student involvement in SSAF governance is crucial to ensure student money is spent appropriately on programs that meet the evolving needs of students at each institution.”* – The University of Newcastle Student’s Association submission. pg. 3

One submission disagreed with the proposal and jointly argued that SSAF fees are critical for universities to support student health and wellbeing:

*“Without SSAF held by universities, universities would not be able to support these essential services in the same way. SSAF is not designed only to support clubs and student activities. Universities must*

*and do account for these funds transparently, including a regular open consultation process. It is for these reasons that the universities, in the absence of alternative funding to provide these essential services for students, oppose these funds being directed by student unions.” – The University of Adelaide and University of South Australia submission. pg. 7*

### **Data collection and distribution on student safety was identified as an important mechanism for improving student wellbeing.**

Seven submissions proposed that student safety could be better maintained and improved if data on incidences of harassment or assault were better captured and made accessible to the public. Four submissions argued for increased transparency from universities on the occurrence of assault on campus and the actions taken in response:

*“Australian universities should be required to publish annual reports of the number/type of disclosures and reports received regarding sexual assault and sexual harassment, and any outcomes and action/s taken.” – Emma Getrix submission. pg. 3*

One submission suggested that government and universities leverage data driven approaches to improving student wellbeing and safety, such that:

*“...a national database or clearinghouse of approved and evidence-based guidelines and frameworks is developed and maintained to inform universities’ implementation of strategies to protect the welfare, safety and wellbeing of all students.” – Orygen submission. pg. 4*

*“...experiences of student wellbeing and safety must be consistently and regularly collected and reported on. An additional field of 3-5 questions in the Student Experience Survey would deliver valuable information for governments, universities and the mental health sector on how students over the past year perceived their mental health and wellbeing, factors which may have influenced this and the level/type of support they received.” – Orygen submission. pg. 4*

### **Managing the casualisation of staff, staff workloads and professional development opportunities were identified as important to improve staff wellbeing.**

Twenty submissions included discussions on improving staff wellbeing, professional development opportunities and employment arrangements. In response to the Accord Interim Report:

- The over-casualisation of university staff and improving employment security was identified in submissions. (14 submissions)
- Taking steps to improve the wellbeing and workload of academic staff was recommended as important for the sectors sustainability. (10 submissions)
- Improve the provisioning of professional development to academic staff to ensure strong teaching capabilities and future career pathways was recommended by eight submissions. (5 submissions)

### **The over-casualisation of university staff and improving employment security was identified in submissions.**

Fourteen submissions commented on the casualisation of the university workforce and the employment security of university staff. Four submissions commented on the need to reduce casualisation in the sector and to increase the ratio of full-time to part-time staff:

*"We need to improve job security for academic staff by increasing ratio of full-time permanent staff and reducing the amount of job casualisation. We must ensure that where workforce casualisation does exist that it is executed in good faith and to an agreed set of standards across universities."* – Dr Carina Garland submission. pg. 2

One submission focused on ensuring government funding is sufficient and properly directed to support core teaching and learning activities, to support the growth of tenured staff and to reduce redundancies and casualisation:

*"Better governance requires sufficient long-term committed funding of universities by government to enable them to do their job, and better regulation to ensure that sufficient funding and other revenue is spent directly on the costs of teaching and research – the core activities of universities – which should include the employment of an estimated 5 times as many F/T continuing (tenured) academics as we currently have, estimated upon levels of current enrolments, and an end to forced redundancies and majority casualisation, and that funding does not continue to be wasted as it currently is on non-essential expenditure (including excessive executive salary packages)." – Public Universities Australia submission. pg.2*

Two submissions proposed the establishment of a "decasualisation fund" (National Tertiary Education union. Pg. 2), established by the federal government, to cover the ongoing costs of converting casual work into ongoing positions. Two submissions contended that while casualisation may be necessary, institutional governance should be strengthened to ensure that staff pay is transparent and commensurate.

One submission disagreed with the Accord Interim Report's focus on casualisation, arguing that:

*"Casualisation of the workforce is frequently expressed as a failing of the system. The UCC would contest that the capacity to employ specialist staff to teach specialist subjects for short periods of time enables the university sector to be agile and responsive to meet the changing needs of the skills that are required by business and industry to build the workforce that is required." – University Chancellors Council submission. pg.2*

## **Taking steps to improve the wellbeing and workload of academic staff was recommended as important for the sector's sustainability.**

Ten submissions agreed that more needs to be done to improve the wellbeing and workload of academic staff. Submissions focused on the volume of work attended to by academics and the need to increase the financial and wellbeing support provided to them:

*"The number one complaint from academic staff at the frontline in universities is the current workload. The JRG has led to a cut in funding which makes it even more difficult from a financial point of view. There is very little leeway to experiment and innovate in education." – Brian Yates submission. pg. 2*

Another submission focused on the high incidence of mental health problems amongst Australian university staff:

*"It has also been estimated that there has been a 50% incidence rate of mental health problems among Australian university staff for more than a decade [...]. Those problems are primarily caused by management and the toxic employment and working conditions in universities. This incidence of mental health problems is not due to genetics or biological causes: it is preventable, and it is caused by ambient stressors for which employers are responsible – in this case, university managements." – Public Universities Australia submission. pg.13*

## **Improve the provisioning of professional development to academic staff to ensure strong teaching capabilities and future career pathways was recommended by eight submissions.**

Five submissions argued for improvements in the provision of professional development to university academic and corporate staff. The Ethics working party of the Australian advocated for academics to engage more regularly in scholarly activities like professional development of conference attendance to develop their expertise as teachers. Another submission focused on the importance of strong administrative and leadership capabilities of university staff, arguing that:

*"There appears to be little awareness or recognition by universities that fundamental skills associated with people management, administrative decision making or the setting and implementation of institutional priorities are necessary or valuable. If the ambitious policy reforms anticipated by the Accord Process are to succeed, Australian Universities must be required to recognise, improve and reward the managerial and leadership capabilities of their academic staff."* – Dr Penny Gleeson submission. pg. 5

Three submissions highlighted the need to provide professional development for staff working with students with disabilities, and for teaching staff with disabilities to provide better support. One submission argued in favour of professional training for staff provisioning support services to students who are blind or have limited vision:

*"That Universities Australia work with Vision Australia and other organisations in the blindness and low vision sector to develop a comprehensive training program for all staff involved in the provision of support services to students who are blind or have low vision."* – Vision Australia submission. pg.3

## **Reducing the prevalence of corporate management practices in tertiary institutions was identified as an option to improve the operation of university governing bodies.**

Sixteen submissions included discussion of improving the operation of governing bodies. In response to the Accord Interim Report, the submissions included discussions of:

- Reducing the prevalence of corporate management practices in tertiary institutions and reduce reliance on external consultancy services. (5 submissions)
- Considering improvements to the Voluntary Code of Best Practice for the Governance of Australian Public Universities and council composition. (4 submissions)

## **Reducing the prevalence of corporate management practices in tertiary institutions and reduce reliance on external consultancy services.**

Five submissions highlighted the need to reduce the prevalence of corporate management practices within tertiary institutions. Submissions argued that corporate methods for measuring the success of teaching and research are unable to capture the detail of *"how individual human beings learn and create."* (Public Universities Australia. Pg.2) Independent Scholars Association of Australia argued that corporate culture contributes significantly to high workloads for academic staff:

*"Corporate culture is a reason for the imbalance between the proportion of professional staff compared with academic staff. It is also a reason why there are so many expectations on academic staff, having the consequence that workloads cannot be kept within the Enterprise Agreements. Over a long period those agreements have not been respected by universities, with underpayment of*

*casual staff being just one issue.” – Independent Scholars Association of Australia submission. pg. 6*

Two submissions also argued that tertiary institutions reliance on professional services and consulting firms should be reduced due to potential conflicts of interest between university clients and concerns around expenditure.

### **Considering improvements to the Voluntary Code of Best Practice for the governance of Australian Public Universities and council composition.**

Four submissions addressed improvements to the Voluntary Code of Best Practice, focusing on ensuring that council compositions are representative of key university stakeholders:

*“ISAA welcomes the concern expressed in the interim report on university governance. In particular, the recommendation that governing bodies should have greater representation of people with knowledge and experience of universities rather than commercial entities is welcome. The composition of governing bodies should reflect the academic and intellectual character of universities.” – The Independent Scholars Association of Australia. pg. 6*

Another submission also agreed and argued the importance of academic leadership in all relevant areas of university governance:

*“University governance in all areas pertaining to or affecting the raison d’être of universities, which is not “business”, but rather teaching and research, should lie with elected career academic leaders from those universities for fixed terms of office, and that academic decision making at levels below boards, councils and senates should lie with the respective faculty and departmental academic staff.” – Public Universities Australia. pg. 18*



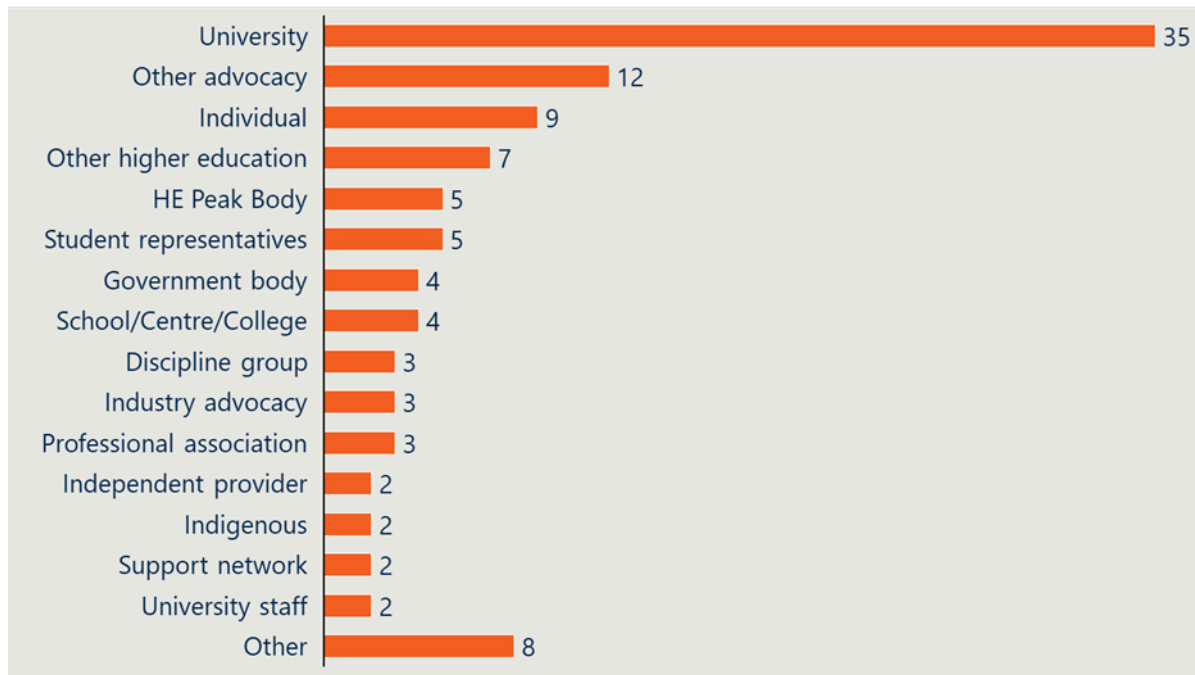
## Sustainable funding and financing

The Accord Interim Report notes that *"The success of the Australian higher education system relies on a secure, enduring and sustainable funding system"* (pg. 139). Funding has been a regularly referenced topic across each of the submissions processes for the University Accord, 122 submissions (40 per cent of submissions) in response to the Terms of Reference, and 106 submissions in response to the Discussion Paper. The Accord Interim Report notes that across these processes *"The Review has heard significant concerns regarding the current funding system, in particular the implementation of the JRG package, cross-subsidisation, a reliance on volatile revenue sources, and system transparency. As such, the Review is examining whether this system is fit-for-purpose and if it requires redesign."* (pg. 139)

In response to the Accord Interim Report's consideration of sustainable funding and financing 106 submissions (33 per cent of submissions) (Refer Figure 12) addressed the following categories:

- Submissions discussed a universal learning entitlement, mission based loading, appropriate discipline mix and improved stability as key principles for the design of a funding model. (51 submissions)
- New and regular approaches to activity-based costing were discussed as an approach to improving the transparency of institutional spending and the cost of teaching and research. (22 submissions)
- JRG, updated HELP arrangements and varying student contributions were discussed as potential changes to ensure affordability for students. (21 submissions)
- Research funding was identified as a key area the sector needs to manage for its long term success. (40 submissions)
- Submissions universally called for an increase in infrastructure funding. (16 submissions)

Figure 12 | Distribution of submissions by respondent category that addressed sustainable funding and financing<sup>13</sup>



### Submissions discussed a universal learning entitlement, mission based loading, appropriate discipline mix and improved stability as key principles for the design of a funding model.

Fifty-one submissions included discussions of what the principles and structure of the Tertiary sector funding model should be. Aligned with the Accord Interim Report, the submissions included discussions of:

- A universal learning entitlement, was broadly supported by submissions, with some disagreement on implementation. (11 submissions)
- Additional mission-based loadings reflecting location and student demographics was strongly supported. (23 submissions)
- Funding WIL, teaching and learning and lifelong learning were identified as important factors for ensuring that the higher education system delivers the discipline mix that meets Australia’s skills needs both nationally, regionally and locally. (10 submissions)
- Submissions strongly supported providing certainty and stability to institutions of funding over a longer period. (32 submissions).
- Submissions largely rejected a levy on international student fee income but were open to considering other funding mechanisms. (48 submissions).

<sup>13</sup> The Other category includes all anonymous submissions and submissions which do not align to another listed category.

## **A universal learning entitlement, was broadly supported by submissions, with some disagreement on implementation.**

Eleven submissions argued for the importance of effectively funding a universal learning entitlement, including some submissions outlining suggested models for implementation. One submission argued:

*“The effectiveness of the concept of ‘growth for skills through greater equity’ would likely remain limited without the inclusion of this element. Incorporating robust accountability measures, this action will be essential in guiding university growth strategies to prioritise the participation, retention, and successful completion of equity students.”* – Provision of Education in Rural Australia submission. pg. 2

Another submission proposed the potential of implementing a voucher system to support a universal learning entitlement (ULE):

*“Recent analysis by higher education policy expert Professor Andrew Norton suggests that the ULE could operate as a kind of voucher system, a mechanism that, in his interpretation, could allow for greater centralised control of the higher education system, or a Job-ready Graduates type approach that values some courses more than others – although this would undermine the ‘universal’ character of the ULE. Voucher systems have been used to improve access for equity groups in some public and private school systems, with mixed results, but they have not been deployed for university education.”* – Charles Sturt University submission. pg. 13

One further submission agreed with the concept of a universal learning entitlement, however they challenged the recommendation that industry should contribute:

*“A universal learning entitlement would encourage the level of education and training required to be maintained throughout life by individuals, including by underrepresented groups. However, including a contribution by employers for such an entitlement would be burdensome for industry. With growing reskilling and upskilling needs, employers already increasingly undertake training specific to their needs. Ai Group’s 2022 and 2023 CEO Expectations reports found increasing investment in training, it being the second highest business investment priority in 2023.”* – Australian Industry Group submission. pg. 2

## **Additional mission-based loadings reflecting location and student demographics was strongly supported.**

Discussion of including mission-based loadings or introducing mission-based funding agreements were included in 23 submissions. The submissions varied in the specificity of their recommendations from simply recommending the varying costs of delivery to providing suggestions for how to introduce a new mission-based approach. Over half of submissions including specific recommendations for implementation suggested a mix of block and formula driven funding. One submission argued:

*“Mission-based Partnership Agreements (Compacts) Establish partnership agreements between universities and government, based on the locations and specific institutional visions of each university, with a flexible funding envelope that includes a minimum basic grant amount for university operational activities based on an appropriate funding measure (such as student load combined with other factors). This should be combined with financing for additional, vision-based and place-based program delivery of national and university priorities in teaching and learning, research, access and equity, community engagement and innovation.”* – Universities Australia submission. pg. 37

On submissions considered the importance of mission-based loading for regional universities in particular:

*“There is an urgent need for a properly costed regional loading for regional universities, who are finding it increasingly difficult to operate post pandemic and JRG. With ever increasing operating costs, and without the benefits of the economies of scale or a large international student cohort, we need adequate funding to provide a sustainable future so that we can continue to provide essential education and research to our regional communities, tailored to their needs, in a way that only a university in their midst can do.”* – University of Southern Queensland submission. pg. 1

Innovative Research Universities called for funding to support partnerships with TAFEs in the mission based funding agreements, stating that *“Accord agreements will ensure differentiation and greater diversity across the system, including in partnerships between universities and TAFEs/the VET sector.”* – Innovative Research Universities submission. pg. 3

### **Funding WIL, teaching and learning and lifelong learning were identified as important factors for ensuring that the higher education system delivers the discipline mix that meets Australia’s skills needs both nationally, regionally and locally.**

Ten submissions included discussion on how the funding model should ensure that Australia’s skills needs are met, in addition to the 22 submissions calling for the removal of JRG, and the funding implications it has had. These submissions included arguments for increasing funding for WIL programs and connection to industry, ensuring that teaching and learning for priority skills areas are sufficiently funded, increasing the funding for life-long learning and increasing funding for cohorts facing disadvantage that prevents them from entering tertiary education. Each of these arguments are exemplified in a quote below.

Increasing funding for WIL programs and connection to industry:

*“The critical importance of building more education partnerships between industry and tertiary education providers, to address future skills needs - including by expanding and improving work integrated learning opportunities for domestic and international students, and ensuring that students have access to adequate financial resources when completing mandatory WIL”* – The University of Sydney submission. pg. 2

Ensuring that teaching and learning for priority skills areas are sufficiently funded:

*“Various stakeholders have pointed out that base funding reductions to several priority fields (such as education, mathematics, science, engineering, nursing, psychology and allied health) have made teaching them financially unsustainable. This is due to the high costs associated with teaching these fields not being covered by the base funding rates. This is of critical concern given the importance of these disciplines to meeting current skills needs.”* – Psychology Training and Public Health Workforce Alliance submission. pg. 2

Increasing the funding for life-long learning:

*“Increase funding for higher education to enable life-long learning through attainment of microcredentials and the extension of Income Contingent Loans to such offerings.”* – Universities Australia submission. pg. 43

Increasing funding for cohorts facing disadvantage that prevents them from entering tertiary education:

*“Given the identified priority of increasing attainment of qualifications to meet Australia’s future knowledge and skills needs, real and practical assistance such as cost of living support should be a core component of university studies factored into the overall Commonwealth funding model for universities rather than defaulting to state and territory governments.”* – ACT Government submission. pg. 2

## Submissions strongly supported providing certainty and stability to institutions of funding over a longer period.

Ensuring long-term financial certainty and stability to the tertiary education sector was a priority in the submission discussions about funding. 32 submissions argued for funding certainty, and no submissions disagreed with the potential proposal for the final report *“providing certainty and stability to institutions of funding over a longer period”*. One submission argued:

*“Universities need funding certainty and safeguards that protect their autonomy, limit administrative burden, and encourage responsiveness and differentiation.”* – Edith Cowan University submission. pg. 2

## Submissions largely rejected a levy on international student fee income but were open to considering other funding mechanisms.

The concept of a levy on international student fee income however was recommended to not be implemented by 48 submissions, with no submissions explicitly supporting the concept. More broadly two submissions included suggestions of other funding mechanisms to be considered:

*“Creating a dedicated Higher Education Fund would provide a yearly dividend to support the sector to fund infrastructure and other sector priorities that traditional funding streams fail to appropriately cover – a role that the international student fee levy proposal was designed to fulfil. To enable the continued growth of the fund – allowing it to account for growing student populations – the government could divert income from student visa fees.”* – Australian Academy of Technological Sciences and Engineering submission. pg. 2

*“Consideration should be given to the creation of a fund or investment stream, whereby government and differential university co-contributions, based on national policy imperatives, are made when drawing upon that support.”* – University of New South Wales submission. pg. 4

## New and regular approaches to activity-based costing were discussed as an approach to improving the transparency of institutional spending and the cost of teaching and research.

Twenty-two submissions included discussions of the importance of improving transparency in the tertiary education sector. Aligned with the Accord Interim Report, the submissions included discussions of:

- Submissions supported exploring new and regular approaches to activity-based costing and pricing to provide transparent and independent advice in relation to funding and expenditure. (11 submissions)

## Submissions supported exploring new and regular approaches to activity-based costing and pricing to provide transparent and independent advice in relation to funding and expenditure.

Eleven submissions explored approaches to activity based costing. The submissions emphasised the importance of transparency and understanding the costs of teaching and research to determine appropriate costs:

*“Understanding the costing of teaching and research: to enable a future discussion on funding growth and new sources of funding, a first step is for government and universities to establish a shared understanding of the costs of teaching and research. The current activity-based costing*

*analysis of teaching is flawed and needs to be revised to calculate accurately the costs of delivery.” – University of Melbourne submission. pg. 6*

Submissions also argued for the importance of taking into account additional funding required for some student cohorts in activity based funding:

*“If funding for teaching is to be linked to some form of activity-based costing, it needs to take account of significant variations across different student cohorts and geographies, as well as across disciplines.” – Macquarie University submission. pg. 5*

## **JRG, updated HELP arrangements and varying student contributions were discussed as potential changes to ensure affordability for students.**

Twenty one submissions included discussions of possible changes to ensure students are able to afford higher education. Aligned with the Accord Interim Report, the submissions included discussions of:

- Changes to the JRG program to improve support affordability for students was supported by submissions. (22 submissions)
- Updating HELP arrangements, including moving to a marginal repayment rate and changes to indexation received limited support. (17 submissions)
- Submissions expressed varying views on setting student contributions at different levels, noting certain courses lead to higher potential earnings. (4 submissions)

## **Changes to the JRG program to improve support affordability for students was supported by submissions.**

The JRG program has been a consistent point of discussion across each stage of the Accord submission analysis processes. In response to the Accord Interim Report twenty-two submissions agreed broadly with the Accord Interim Report’s conclusion that the JRG requires changes. Three main reasons were included for changes:

- The JRG unevenly impacts student contributions, reducing student affordability, with limited evidence of changing student decision-making.
- The JRG has reduced total funding to universities and exacerbated existing funding challenges.
- The JRG has left fields deemed a national priority underfunded.

One submission agreed the JRG requires changing, however believes that the Accord Interim Report does not go far enough:

*“Unfortunately, the recommended priority action in the Interim Report, and its adoption by Government, falls short of what is required. The extension of the Higher Education Continuity Guarantee has provided some welcome certainty for universities, but it does not deal with the chief problems created by JRG. On current evidence the underfunding of various courses will continue for another two years and if standard grandfathering arrangements apply as many four or five cohorts of students will graduate with disproportionate debts resulting from poor policy decisions.” – Charles Sturt University submission. pg. 14*

## **Updating HELP arrangements, including moving to a marginal repayment rate and changes to indexation received limited support.**

The HELP scheme was a regularly referenced across the submissions (17 submissions) discussing student affordability. Multiple submissions confirmed the importance of HELP and argued it should be maintained

and strengthened as stated by the University of Sydney *“Australia’s income contingent Higher Education Loan Program (HELP) is a world-leading policy that must be maintained and tweaked to improve its fairness along the lines proposed in the Accord Interim Report.”* – University of Sydney submission. pg. 4.

Despite the strengths of HELP, submissions called for some amendments to support student affordability. These calls have been prompted in part by the higher inflation rates placing additional pressure on some students. Ten suggestions called for reduced student contributions. One suggestion was to change the indexation rate applied to HELP loans:

*“Index Higher Education Loan Program (HELP) to either CPI or the 10 year government bond rate, whichever is the lesser”* – Chartered Accountants Australia and New Zealand submission. pg. 3

### **Submissions expressed varying views on setting student contributions at different levels, noting certain courses lead to higher potential earnings.**

Student contributions as a mechanism for incentivising students to choose certain courses over others was rarely discussed except in the context of changes to the JRG. Four submissions directly discussed utilising course fees to influence student decision making.

One submission argued:

*“The model should not seek to overtly influence student choices, as students are more effective at responding to emerging labour market opportunities and national priorities, than centralised administrations are at adjusting incentive structures.”* – Australian Technology Network of Universities submission. pg. 8

In contrast one submission proposed:

*“The design of new principles for sustained investment that underpin a new student-centred funding model, including the refining of HELP, must also be compelled by industry skill needs into the future. It is therefore vital that a new funding model considers impacts on the VET system, to avoid distortions around numbers of students entering each sector.”* – Australian Industry Group submission. pg. 1

### **Research funding was identified as a key area the sector needs to manage for its long term success.**

Research funding is a topic of importance for a large proportion of the submitters, with 40 submissions including arguments for changes in research funding. The discussions can be segmented into six broad ideas:

- Increase to total research funding.
- Ensure that research funding is stable and predictable.
- Update the funding model used to support early career researchers, including PhD students.
- Improve universities’ capability to support the innovation sector.
- Recommendations for the balance of research funding between types.

Submissions which argued for an increase in total research funding argued for three different targets/levels of funding, funding the full cost of research (30 submissions), total research funding equals three per cent of GDP (eight submissions) and increase total research funding to OECD average levels (seven submissions).

The specific research funding model to allocate the total pool of funds varied between submissions, seven submissions called for a predictable funding model, no matter the final form chosen:

*“Through universities and the broader science system fostering national research excellence and expertise, we afford Australia a level of independence to prioritise and address challenges that are unique to our nation and are key to our prosperity. This important role for higher education institutions cannot be built on funding instability and lack of direction.”* – Australian Academy of Science submission. pg. 2

Supporting early career researchers, in particular PhD students has been a theme of submissions across each stage of the Universities Accord submissions process, and was included in 15 submissions responding to the Accord Interim Report. The importance of increasing PhD stipends was described by one submission:

*“Urgently address HDR stipends to ensure that Australia can develop, attract and retain the best talent, and is better able to attract PhD candidates with industry experience.”* – Cooperative Research Australia submission. pg. 3

Ensuring the funding model is appropriate and total funding is available to support Australia’s innovation sector was a topic of discussion in six submissions. Suggestions included:

- Introducing new incentives to support business, university and TAFE partnerships.
- Introduce a National Future Industries Council *“to ensure governments have a trusted source of expert advice on research gaps, requirements and opportunities”* – Business Council Australia submission. pg. 9

Finally, multiple submissions included specific suggestions for new funding models:

*“The Research Block Grant should be increased to cover the research mission of all universities, linked to total research funding provided through the Education portfolio at a rate of no less than 50 cents in the dollar. Research Block Grant should be allocated to universities as part of their Accord agreements, based less on a standard funding formula and more on institution-specific strengths, priorities and mission. Accountability for this funding should be linked to measures of both research quality and research impact.”* – Innovative Research Universities submission. pg. 2

*“Consideration of a new Sovereign Research Investment Fund similar in nature to the former Education Investment Fund, but with capacity to selectively support research programs and infrastructure in areas of national importance (potentially aligned with the Australian Government’s National Science and Research Priorities);”* – Academy of the Social Sciences in Australia submission. pg. 2

*“We propose the introduction of publicly financed, revenue-contingent loans (RCLs - analogous to HECS) to facilitate innovative companies being able bridge the start-up funding gap at the same time as generating revenue to be shared with the direct university-based originators of the research ideas. Thus, if successful, the policy will potentially offer solutions to two major public policy objectives:*

- Increasing the level of sustainable R&D coming from university/business partnerships; and*
- Providing financial incentives to universities for the commercialisation of research which do not rely on government funding.*

*To begin, explaining what an RCL is, and why it is a useful concept, is essential. An RCL is a debt collected from business that depends on a measure of the company’s financial health, its gross revenue, as reflected in quarterly financial statements (as required by law as part of the Business Activity Statement). RCLs have a major advantage over company grants or tax concessions because much of the finance outlaid by the government will be returned, but only when the firms benefitting*



*have the capacity to repay in the future on the basis of revenue, thus allowing greater support for and coverage of prospectively good investments. Risks for the company are minimised, in much the same way as the Higher Education Contribution Scheme minimises the risks to students in repaying tuition costs of their university education. In both cases careful selection mechanisms can be in place to minimise poor investments overall. To make sure that there are no financial difficulties for the companies assisted, the loan is not repaid until the innovating firm returns a profit, which will be particularly significant if the scheme is applied to start-ups, the commercial space in most need of government assistance, and with the debt being paid based on a percentage of the company's annual revenue. Thus, this feature of the RCL provides insurance for the innovating firm that is not available from commercial loans. The system can be designed to incorporate subsidies, with there even being the potential for full cost recovery, or more.” – Anonymous submission. pg. 1*

## **Submissions universally called for an increase in infrastructure funding.**

Sixteen submissions argued for the importance of increasing funding for teaching and research infrastructure at universities. Four key themes emerged in these submissions.

The National Collaborative Research Infrastructure Strategy (NCRIS) should be continued and funding renewed:

*“The NCRIS has been a powerful enabler of Australian research and innovation, providing critical capabilities for the national scientific effort. The Interim Report’s proposal to move NCRIS to sustainable, ongoing Australian Government funding is supported.” – University of Queensland submission. pg. 3*

The current infrastructure funding approach does not sufficient support all universities, in particular regional and smaller universities:

*“RUN is pleased to see an acknowledgement in the Interim Report of the important role played by a student’s access to world class tertiary infrastructure and facilities. RUN is also pleased to see the Interim Report acknowledge that the challenges for some smaller institutions, including regional universities, in servicing the infrastructure needs of their cohorts and communities is intensifying, yet limited by their inability to access the full sources (and magnitude) of income realised by larger institutions. Understanding and addressing these limitations will become increasingly important given the pivotal role of regional universities in meeting the equity targets of the Accord.” – Regional Universities Network (RUN) submission. pg. 26*

One submission encouraged the introduction of a new infrastructure financing facility:

*“Develop a new infrastructure financing facility to ensure every university student and researcher in Australia has access to high quality teaching and research facilities.” – Universities Australia submission. pg. 38*

## Building an Accord

Limited submissions provided commentary on the Accord Interim Report's discussion of how to implement *"an ambitious, enduring Accord"* (pg. 157). In total, only eight submissions made explicit reference to this section of the Accord Interim Report and few submissions addressed the Panel's proposed accord process to:

- convene a series of forums to discuss key challenges facing higher education, or to
- establish a collaborative process between government, student representatives, industry, academics and community and union groups to tackle key issues and challenges.

Four universities agreed with the importance of establishing an enduring Accord. Flinders University agreed that *"The process to implement an ambitious, enduring Accord should include a series of forums to address key challenges and embed collaboration with jurisdictions, communities, and the higher education sector."* (pg. 4) one submission stated:

*"UTS supports an ongoing dialogue for the development of a 2035 vision for Australia's higher education sector. The proposals for forums and collaborative opportunities with stakeholders is supported. However, there are outstanding issues of governance, policy implementation, funding sustainability, funding priorities, standards, expectations and values etc that leads to the conclusion that the Final Report should prioritise and chart out an implementation roadmap."* – University of Technology Sydney submission. pg. 7

Another submission proposed the establishment of forums to facilitate better decision making around higher education:

*"The Victorian Government has previously called upon the Commonwealth Government to establish formal and permanent roundtable forums for dialogue and shared decision making on higher education matters among Commonwealth, state and territory governments at the ministerial and senior official level. Given the Report's recommendations for improved connection and coordination between higher education and VET, a similarly joined up approach to interjurisdictional engagement is also recommended, including regular engagement and coordination between the Commonwealth Ministers for Higher Education and Skills with state and territory counterparts".* Victorian Government. pg. 4

While relatively few submissions spoke directly about the broad accord building process, many submissions flagged the need to continue consultation and collaboration while developing and implementing strategies based on submission recommendations.