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1 September 2023

Professor Mary O'Kane AC Chair Australian Universities Accord

Dear Professor O'Kane

Australian Universities Accord Interim Report Paper

We welcome the opportunity to provide feedback on the Australian Universities Accord Interim Report released on 19 July and commend the Panel for their work.

The Accord process is a defining opportunity for our nation at a time when we are facing unprecedented global challenges. We see the key issues as national security and sovereignty in the Asia-Pacific region, addressing rapidly increasing challenges related to climate change, environmental management and sustainable sources of energy, food and clean water security, the increasing pace of technological change and development which continue to outpace and challenge existing ethical and legal frameworks, chronic workforce shortages (particularly in the 'care economy') and the impact of all of these trends on people and their communities. It is these considerations that have shaped our response to the Interim Report.

We recognise that the Accord aims to meet these challenges by ultimately setting up a higher education system that educates and trains a larger workforce capable of working across boundaries to address these challenges. We share a hope that weaknesses in the Australian higher education system may be addressed by a higher education system and funding model that adequately recognises university mission and place.

Kind regards



Professor Geraldine Mackenzie Vice-Chancellor



AUSTRALIAN UNIVERSITIES ACCORD

EXECUTIVE SUMMARY - SUBMISSION ON INTERIM REPORT

1. Considerations

The University of Southern Queensland welcomes the Interim Report's focus on equitable access and participation in higher education as fundamental to the social and economic prosperity of Australia and critical to meeting present workforce shortages and future workforce needs, and concur that people from currently under-represented and diverse backgrounds must have the opportunity to participate successfully in higher education irrespective of where they live and their social, cultural and educational backgrounds and, furthermore, it is essential that higher education participation is representative of the population if the sector is to increase attainment to the extent outlined in the Interim Report. Concurrently, the sector needs stable and appropriate funding arrangements to ensure appropriate supports are in place to support growth in student numbers and their success and ensure ongoing capacity building in the national-building education and research outcomes of higher education.

The Report recognises the need for funding arrangements that acknowledge the importance of the sector's contribution to Australia's future. The intersection between post-COVID19 sectoral recovery, broader economic conditions and outlook and ongoing funding and cost pressure are signalling real challenges for regional universities in particular, due to their lower financial capacity and resilience. Lower economies of scale, thinner markets, and current lower demand for education in regional settings impact the ability of universities like University of Southern Queensland (UniSQ) to generate funds to invest in innovation and the regeneration of physical and digitals assets and capabilities, which we expand on below.

Big Reflections

- 1. Better support for under-represented students and the regions we recommend the following:
- Waive or significantly reduce HECS debts for students who study at regional campuses and work in the regions for a specified time (eg, 3-5 years), needed to stop the "brain drain" to the capital cities.
- **Bursaries or scholarships for Australian First Nations students** who are eligible for a university place, given that equity in access, participation and attainment is essentially a funding issue for institutions and students. A range of other solutions are suggested in *Appendix 1*.
- Commonwealth funded accommodation scholarships for regional, remote and rural students studying on-campus at regional universities. UniSQ has provided these scholarships up until now but can no longer do so due to financial constraints. Accommodation scholarships are urgently needed to attract and keep students in the regions for the sake of Australia's future economic and social prosperity.

2. Better funding support for regional universities

- 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.
- We welcome the commitment of the Review Panel to further consider **research infrastructure** funding, but, as noted in section 2 below, do not support the use of an international student levy to achieve this. See further on research at *Appendix 2*.
- There is an urgent need to **reinstate university infrastructure funding.** Like most other regional universities, UniSQ struggles to maintain and replace aging infrastructure, in many cases over 50 years old, and critical to the University's operations, eg, student accommodation, critical teaching and research facilities. With the demise of the Education Investment Fund, any capital spend must come from our diminishing cash reserves or borrowings. With already weakening cashflows since the pandemic, and the negative impact of the JRG scheme, the current funding situation is not sustainable.

Regional universities do not have the economies of scale nor the significant additional international student income to have sufficient operating funds for the necessary capital spend.

- We welcome the Panel's recognition of the need to redesign the JRG package as soon as possible, and in addition we urge consideration of a sustainable, future and student focussed overhaul of the funding system. The key policy underpinnings and consequences of JRG, documented in the Interim Report, have served to further exacerbate financial challenges of the sector. Many universities, including UniSQ, are now facing structural deficits caused by a funding model that does not recognise the true cost of educating students and conducting research, particularly as funding for high-cost programs such as nursing and engineering was decreased by JRG. The welcome continuation of the Higher Education Continuity Guarantee signalled by the Interim Report is not enough to prevent further financial deterioration, and urgent measures are needed. Though the balance sheet strength of UniSQ was sufficient to weather the pandemic, our capacity to continue to grow participation in education across regional Australia will be adversely impacted without significant changes to funding.
- UniSQ supports the intent to assist regional universities to improve their financial sustainability, in particular the points below, and further discussion at *Appendix 3*.
 - **Structural adjustment funding** direct investment by the Government to support asset retirement and regeneration at universities, particularly those with large regional campuses.
 - Digital transformation digital innovation is reshaping learning and knowledge creation at an accelerated speed following the impact of COVID-19. Despite our limited capacity for reinvestment, many regional universities are endeavoring to innovate our academic technologies and support services while also directing resources into enhancing cyber security capability. Directed funding by the Government into enhancing the digital capabilities will enable the sector to keep pace with the opportunities and challenges of digital transformation.

3. Place-based initiatives

A stable and sustainable funding system alone will not position regional universities to meet necessary growth in participation to meet targets. We need clear and connected policy settings across the broader education system to build aspiration and stimulate demand from under-represented groups.

- We welcome the Interim Report's recognition of the role of universities and the regions, and in particular the role of regional universities in providing essential services which sustain economic development. Place-based initiatives are effective in addressing entrenched disadvantage, improving community outcomes and developing resilience in remote areas. In UniSQ's case, a strong commitment to regional communities through place-based research can be demonstrated by the case studies provided in *Appendix 4*. At a time when the European Union and USA are turning to place-based industry policies, there is an opportunity to leverage regional universities' multi-disciplinarity and community connections to turbo-charge industry development in the regions.
- Achieving the aspirational but critical ambitions of the Accord to double participation in higher education will
 require far more engagement and connectivity between the various contributors to Australia's education
 ecology. Building aspiration and foundations skills, knowledge and literacies during the primary, middle and
 senior phases of schooling, along with governments at all levels valuing both VET and higher education
 outcomes equally, and importantly their interconnectivity, will be fundamental to broadening and increasing
 participation. Improved collaboration between the sectors could be enabled by more connected intersectoral policy, and contestable place-based funding, enabling institutions to strengthen pathways for
 students.
- There is a need to **better incentivise and integrate international student attraction and education in regional universities**. There are insufficient incentives at present to encourage international students away from the capital cities, despite the manifest benefits of them studying in the regions, for the economic benefits of regional communities and Australia as a whole.
- We also reiterate a number of factors which we believe are critical to **research success** in regional Australia and cannot be disregarded. These are also outlined in *Appendix 2*.

2. Areas of substantive agreement or disagreement

Substantive Agreement

Demand driven places for First Nations students and a focus on equity cohorts

UniSQ applauds the introduction of demand driven places for First Nations students and the increased focus on under-represented cohorts. The major barriers for access, participation and completion for these groups is intergenerational disadvantage and poverty. The aspirations of a demand driven system for First Nations students will only be realised if substantial financial relief is provided to offset both living and studying costs, and we have suggested some strategies for consideration under "Big Reflections".

Tertiary Education Commission

We are broadly supportive of the need for an independent Tertiary Education Commission (TEC) or similar independent body that would provide support for a new tertiary system by working with providers to develop place- and mission-based performance agreements that encourage diversity in teaching and research areas of focus to address national needs. A key role for a TEC would be to assist government and institutions to implement new policy initiatives in a planned and coordinated way, ideally through the annual compact process. Such a role is key to overcoming the multiple reporting requirements currently associated with competitive schemes for additional Commonwealth Supported Places (CSPs). We urge further and separate consultation with the vocational and higher education sectors about what such a Commission should and should not do. We contend that a TEC should not be a regulator, nor should it take on any of the regulatory or quality assurance functions of the current regulators. See further discussion in *Appendix 5*.

Substantive Disagreement

Levy on international student fees

We do not support a levy on international student fees, regardless of the level charged and whether such a levy would be imposed on students themselves or on the institutions that welcome them, for reasons of deterring international enrolments and instead directing students to other international markets, in turn compromising Australian university rankings internationally. Australia must put students at the heart of the international education system to ensure that the nation can embrace cultural diversity, build inclusive communities and advance Australia's position in the region - at odds with an international levy. See more discussion at *Appendix 6*.

Proposal for a National Regional University (NRU)

The Interim Report states that "to date, no study has been conducted to investigate the appropriateness of a single university model for regional areas". In fact, subsequent to the Bradley Review in 2008, a \$2 m feasibility study into the formation of a new national University in regional Australia (NURA)¹ was commissioned in 2009 by then Prime Minister Gillard, and laid out the range of opportunities, and many challenges, in such a proposal. After the feasibility study, the NURA did not proceed due to many issues. A positive outcome, however, was the formation of the Regional Universities Network, a valuable and influential grouping of seven regional universities who share expertise, and, inter alia, advocacy and lobbying.

Regional universities are anchor points in their communities, providing local access to skills development and research capabilities that support a diverse workforce and economic development. In our submission, the amalgamation proposal will disrupt and undermine the valuable contributions that regional universities make to our regional economies, with little financial, social or educational benefit. We consulted our local, State and Australian government representatives from Toowoomba, and all had serious concerns about this proposal. Further submissions on the National Regional University are at *Appendix 7*.

3. Summary

While we support the ambition and intent of the report, a clearer focus on how we can achieve greater participation in higher education requires a broader consideration of the entire education ecosystem. The question is how we build aspiration to study at university among regional and disadvantaged students, and how the Accord's outcomes can provide a clear and supported strategy to do this. It will also be critical to ensure that the approach to implementing recommendations is explicitly discussed with sector-wide stakeholders to ensure a reduction in regulatory, compliance and administrative reporting under which the sector is already buckling.

¹ https://web.archive.org/web/20110223052255/http://www.nura.edu.au/



Possible solutions to support a focus on equity cohorts

For institutions:

- Mission and place-based performance agreements that take into account institutional factors such as
 operating and financial environments, funding for infrastructure maintenance, and investment including
 digital transformation, cohort characteristics, geographic footprint and campus locations, fields of
 education taught, and fields of research undertaken. These agreements could be considered as a baseplus model and could be negotiated with a TEC (if established).
- Inclusion of Enabling in the Australian Qualifications Framework (AQF), establishing a national benchmarked system for enabling outcomes, extending the demand driven system to enabling places with the student contribution being fully covered by enabling loading at the appropriate funding cluster rate.
- Revision of the allocation of courses to funding clusters (the base of the funding model). This would need to be accompanied by the review of the Higher Education Loan Program (HELP) loan systems currently underway, to return the system to its original intent of repayments based on future earnings, raising the threshold for repayments, while controlling student and government debt through a fairer indexing process.
- Inclusion of additional administrative funding envelopes to meet the costs of managing mandatory placements and offset the fees charged by State agencies for placements provided, or negotiation of the removal of such fees imposed by States.
- Setting a national target for investment in research of 3 per cent of GDP, with an immediate commitment to fund 50 per cent of the indirect costs of research, thus reducing cross-subsidisation from education revenue.

For students:

- National performance benchmarks set for specific cohorts and their outcomes that recognise intersectional / multiple factors of disadvantage.
- A national system of bursaries to assist students from equity groups to offset costs of higher education, including loss of income and additional costs associated with mandatory placements which disproportionally impact equity students and reinforce the barrier that poverty places on participation.
- Accompany the demand driven places for all Indigenous Australians with a scholarship / universal learning entitlement system to promote progression, retention and completion as well as opening up access (without which the demand driven places will not significantly increase). Set targets greater than parity for First Nations participants.
- Extending the current equity groups and broadening definitions to allow tracking over time and also to include additional markers for 'first in family' students, care givers and non-school leavers.
- A national collaborative campaign aimed specifically at under-represented cohorts to stimulate demand and improve the participation and outcomes of under-represented groups, with target setting and funding to be set at institutional level.

In addition, support for partnerships that advance First Nations outcomes would yield significant benefits. The following **case study** demonstrates how such partnerships can be leveraged to the significant benefit of regional communities and the country more broadly.

Case Study : Enabling a rural and remote First Nations Nursing Program

Setting the Scene

UniSQ has a proud history of supporting First Nations nursing success. We are recognised and celebrated for several underpinning foundations of enabling this success. UniSQ was the first university in Australia to include Indigenous Health as a mandatory Course in the Nursing Program in 2003. It would not be mandated by regulation authority as curriculum for another 9 years across the sector. Further, UniSQ has employed Indigenous Nursing and Midwifery academics in a continual capacity since 2000, the only university in Australia to have done so. Notably, in UniSQ's inaugural intake of nursing students, two First Nations nurses in the cohort were sisters who graduated in the inaugural graduation in 1992 and are still working as Registered Nurses some 30 years later. In addition, we have graduated four First Nation nursing PhD graduates. The fact that our graduating cohort includes numbers of First Nation nurses that choose to come here from rural and remote First Nation communities demonstrates that our success in recruiting First Nations nurses is due in part to our unique positioning as a regional university. These First Nations nurses have gone on to become leaders within the field of nursing and midwifery and a cohort of four has gone on to study medicine.

The current rural and remote partnership between UniSQ and SQRH

UniSQ is currently in partnership with Southern Queensland Rural Health (SQRH) since its inception in 2020. Funded through the Commonwealth Department of Health under the Rural Health Multidisciplinary Training Program, SQRH is a University Department of Rural Health (UDRH) and a collaboration between University of Southern Queensland, The University of Queensland, Darling Downs Health and Southwest Hospital and Health Service. This partnership services Southwest Queensland, a 300 square kilometre region. As evident from *Table 1* below, the First Nations population has grown from 2016-2021 and makes up 12.7 per cent of the Southwest population, some 7.6 per cent higher than First Nations in all Regional Qld.

Ancestry - Ranked by size								
South West Queensland ROC - Total persons (Usual residence)	2021		2016			Change		
Ancestry ÷	Number _‡	%≑	Regional QLD %	Number _‡	%≑	Regional QLD % €	2016 to 2021 _€	
Australian	10,298	43.2	35.3	11,801	48.8	37.7	-1,503	
English	8,401	35.3	39.6	8,839	36.5	39.2	-438	
Australian Aboriginal	3,032	12.7	5.1	215	0.9	1.2	+2,817	
Irish	2,568	10.8	10.9	2,851	11.8	11.7	-283	
Scottish	2,310	9.7	10.4	2,352	9.7	10.4	-42	
German	1,390	5.8	6.3	1,462	6.0	6.6	-72	
Filipino	272	1.1	1.3	224	0.9	1.0	+48	
Italian	202	0.8	3.2	212	0.9	3.0	-10	
Dutch	176	0.7	1.5	150	0.6	1.4	+26	
Chinese	150	0.6	1.6	176	0.7	1.5	-26	
Show all (47 entries)								

Table 1 – Population comparison

In 2022, the Bachelor of Nursing Program commenced at the Charleville SQRH facility and is a program that is organically growing with First Nation students, with two cohorts having commenced. The Bachelor of Nursing Program features the following:

- Nursing started in 2022 through SQRH, in partnership with UniSQ, with first- and second-year nursing students.
- Third year students will graduate in December 2023 (thus offering a full undergraduate cohort).
- Of 16 students currently enrolled, five are both Aboriginal and Torres Strait Islander.
- Enrolment has allowed for students to enter as second year students where they hold TAFE-qualified Diploma of Nursing certificates.

The Current delivery pattern is three-week residential in Semester 1 and two-week residential in Semester 2.

Future pipeline

A future pipeline within this region is largely untapped. The Charleville campus, in partnership with SQRH, has clear capacity to keep organically growing and supporting First Nations students. This example is provided to demonstrate the significant potential for funding that could be unlocked by the Accord process to activate improved First Nations outcomes. Given the challenges of recruiting and retaining nursing staff into rural and remote parts of Southwest Queensland, this type of support for rural focused programs has potential to significantly close the gap in Southwest Queensland.



Critical considerations for research success

Safeguarding Australia's Research Workforce

- Higher Degree Research (HDR) stipend rates for HDR students are too low to attract domestic students into doctoral programs.
- The demand for doctoral graduates will substantially increase as the sector grows to accommodate an additional 900,000 students, and the baby boomer bulge leaves the sector.
- A significant increase in the block grant is needed to enable an increase in the stipend rate, and doctoral cohort, and we should lift the current 10 per cent cap on international stipends from the Research Training Program (RTP).
- Tying the Research Support Program (RSP) to 50 per cent of research income will also remove the deflationary impact of indexation of RSP not keeping pace with research income growth.

Meaningful differentiation of universities and engagement between industry and universities

- The current research funding system for universities could best be described as broken, as are mechanisms to encourage university-industry collaboration eg, Co-operative Research Centre (CRC) program, tax incentives. In our submission the system needs a complete rethink.
- We propose a mechanism by which we can develop meaningful differentiation of universities based on place, capacity to address critical economic and social agendas, and aligned with national need and priority. These areas should be funded to build and develop research expertise (a compact-like process).
- This should operate in parallel to existing competitive and direct industry funding.
- By way of example, UniSQ, through its Drought Innovation Hub², is a world leader in application of seasonal climate variability to delivering benefit to farmers and regional communities. UniSQ is not only ideally placed because of location and expertise, but is also delivering research impact internationally. Benefits of base university funding for this capability are a more sustainable long-term platform and agility to develop a hub and spoke model (UniSQ working with other universities) to be able to address 'wicked' challenges nationwide, and internationally. This would provide a focal point for industry to come to university for solutions and universities would have capacity not tied to specific projects to be responsive to industry needs.
- A best practice exemplar is the United Kingdom's Engineering and Physical Sciences Research Council (EPSRC) Future Manufacturing Research Hubs model³. Such a model allows differentiation of universities focusing on both internationally competitive research (essential) and strategic priorities as well as bringing back to universities the leadership of research.

² <u>https://www.unisq.edu.au/research/sqnnsw-hub</u>

³ <u>https://www.ukri.org/who-we-are/epsrc/centres-and-institutes/future-manufacturing-research-hubs/</u>



There are increased challenges with financial sustainability for all Australian universities. As a sector, we need to adapt and innovate to meets the needs of students across all stages of lifelong learning and develop the skills needed now and in the future. The Australian Universities Accord presents an opportunity to look at a long-term sustainable funding model that supports universities to improve access to higher education, across teaching, learning and research.

Considerations				
The current funding model and regulatory environment inhibits innovation	Universities operate in a complex environment. They are a part of their local communities and have obligations in the respective State and Territories where they operate, as well as at a Commonwealth level. Further, they operate on a global level to attract students and collaborate across teaching, learning and research. The current system creates inefficient and cost-intensive processes in universities. It is a clear need to build a more effective higher education funding model that builds incentive for students to engage with higher education and provides reasonable funding to enable Universities to continue to build the already high levels of quality and excellence in Australian teaching and research.			
Universities have large overheads related to ageing physical infrastructure	Achieving shifts in the cost base of universities as a way of focussing funding toward protecting and growing quality in core business operations requires investment. Universities need access to appropriate funding sources to support their structural adjustment to the significant transformative effects that technology is and will continue to have on our sector. The maintenance of safe and fit for purpose physical infrastructure contributes significantly to the annual operating costs of the sector and this is likely to increase across time as deferred maintenance continues to rise.			
Shared services across universities does not equal efficiencies	Shared services aim to achieve efficiencies by simplifying processes and ultimately reducing costs. They require considerable investment to set up and support, and a continuing commitment to managing. When these models have been applied in government (e.g., Queensland), they have not been as efficient as they could be due to the complex operating environment. Shared services strategies are effectively outdated. The emergence of technology solutions including most recently generative AI, present significant opportunities for organisations to simplify and streamline work. Regional universities (and most probably the broader sector) would benefit from financial assistance to drive faster uptake of new technologies across a range of university functions.			
Connection to community is important for regional universities	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. The 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 identify and branding effecting local community relationships, regional employment options and the capacity of regional universities to attract and ideally retain domestic and international students to our regions			



Bunya Pine project

Bunya pines, iconic conifers that hold special significance to First Nations communities and Queensland's biodiversity, are under serious threat in the Bunya Mountains National Park due to a dieback caused by introduced pathogens known as *Phytophthora* spp.

This project uses DNA sequencing to decode the genomes of the Bunya pines and *Phytophthora* spp. in order to investigate genes associated with disease resistance and development. UniSQ will activate citizen science to explore the genetic diversity of the Bunya pine populations across Queensland. The expected outcomes are molecular methods to identify dieback-resistant plants for regeneration purposes, tools for rapid disease diagnostics and pathogen monitoring, and a phosphite-based method for dieback control.

Key benefits expected from the project are:

- protecting Queensland's biodiversity from invasive pathogens;
- maintaining cultural heritage values in partnership with First Nations people; and
- building citizen science engagement in biodiversity conservation.

The project was designed and will be executed in strong partnership with Queensland Parks and Wildlife Service (QPWS) Pest Management and Biosecurity. The Bunya People's Aboriginal Corporation (BPAC) will be key partners in this collaboration.

Note: in application stage – funding not yet approved

Goondir Health Services project

The University of Southern Queensland is working with Aboriginal Community Controlled Health Service (ACCHS), Goondir Health Services, to provide primary health care and related health services to the local Aboriginal and Torres Strait Islander (ATSI) communities from South East and South West of Queensland to streamline health care to Aboriginal and Torres Strait Islander communities in Oakey, Dalby, St George and Chinchilla.

Jointly funded by the Queensland State Government, the project focuses on the early detection of chronic health conditions using an Artificial Intelligence (AI) prediction model in First Nation communities in rural and regional Queensland. Given that chronic diseases cause 64 per cent of the total disease burden among First Nations peoples, patient data such as sugar level, blood pressure and oxygen saturation are crucial for health management purposes. The current manual analysis of data can delay Goondir's identification of potential hospitalisations or the need for support services.

The initiative uses cutting-edge AI algorithms to implement an automated prediction system that would identify when a patient requires hospitalisation or requires support that would prevent hospitalisation.

Note: Advance Queensland Industry Research Fellowship well underway



Suggestions for Tertiary Education Commission remit

The following points are provided as a means of ensuring clarity in mission for a Tertiary Education Commission:

- Have a governing structure that is independent of all sector stakeholders including government and other funding bodies.
- Provide a coordinating mechanism across agencies eg, Department of Foreign Affairs and Trade (DFAT), Department of Home Affairs, Department of Education, Department of Health and Aged Care, and associated State and Federal jurisdictions.
- Provide a single voice to the Minister (a systems-thinking approach), as well as support individual institutions to be successful eg, individual learner success plans for each institution.
- Lead discussions with professional accreditation organisations and universities to fully implement the 2016 Joint Statement of Principles for Higher Education Course Accreditation by Professional Organisations. The TEC should work with providers and accreditation bodies not currently covered by the agreement to extend the principles to those professions and that regulate the significant workforce areas of nursing and allied health disciplines and professions.
- Work with industry and other key stakeholders (eg, Jobs and Skills Australia, State Governments) to progress education reform packages. An example might be to reconsider recommendations arising from the AQF review, such as developing and implementing a tertiary skills taxonomy that includes application of functional and knowledge skills, and which would provide the foundation for an integrated tertiary sector to be developed over time.
- Consult with universities to foster innovation, diversity, outcomes etc through the development of effective levers and incentives.
- Provide some of the guidance and coordinating functions around Learning and Teaching, student success and research that current fall to Universities Australia (UA) or the regulator (both of which are active in respect of student safety)



Shaping the future of Australia and our Asia Pacific Regions through linking of the Australian Migration System with international education

International education is at the forefront of Australia's foreign policy and plays a critical role in the security and prosperity of the Asia Pacific region. While Australia has a long history of migration, there has been a shift in focus in recent years towards a more strategic approach to migration, one that is aimed at shaping the future of Australia and our Asia Pacific neighbours. This new approach involves linking the Australian migration system with international education. By linking the Australian migration system with international education, the country has the potential to shape its future and that of the Asia Pacific region in several ways.

Firstly, it provides a unique opportunity for Australia to attract and retain the best and brightest minds from around the world. International students who come to study in Australia often go on to contribute significantly to various sectors such as science, technology, medicine, and business. By providing a pathway for these students to migrate and settle in Australia, the country can ensure that it retains talent that can drive economic growth and innovation.

Secondly, linking migration with international education strengthens Australia's diplomatic ties with our Asia Pacific neighbours. As more students from these countries come to study in Australian universities, they establish personal and professional connections with their Australian counterparts. These connections can foster stronger relationships and collaborations between Australia and Asia Pacific partners, leading to enhanced regional cooperation and mutual understanding. This is also beneficial for our domestic cohorts - by exposing Australian students to different cultures and ways of thinking, international education opens doors to new opportunities and fosters a global mindset that is essential in today's interconnected world.



- The "operational efficiencies" referred to in p107 of the Interim Report would, in fact, would not only be very difficult to achieve, but would have the opposite effect. The cost of bringing together a possible 10 institutions would be prohibitive, and achieve little in the way of actual ongoing cost savings. The most topical example is the proposal to bring together two neighbouring Adelaide universities, University of Adelaide and University of South Australia, which alone is estimated to be costing between \$500 m to \$700 m.
- "Academic synergies" would be difficult to achieve with geographic distance, different State systems, different semesters and different academic programs at each institution, all developed to meet the needs of their local communities. Further, such synergies would be almost impossible to achieve with oncampus students, and it is worth noting that all international students and most school leavers study oncampus, and although UniSQ and University of New England are predominantly online, that does not apply to others such as University of Sunshine Coast.
- This proposal appears to assume that greater collaboration and synergies between regional universities are the most desirable and positive outcome. Without disagreeing with the merits of this proposition, we would point out that regional universities, and certainly UniSQ, collaborate frequently with our geographic neighbours and universities with whom we have natural synergies, rather than other regional universities. In research, our major collaborations lie in our three Trailblazer projects, one of which we lead in Space research, in collaboration with ANU and UniSA. We also partner with QUT in UQ's Food and Beverage Accelerator. There are many similar examples.
- Amalgamations of unviable institutions, rather than the establishment of a National Regional University, should be considered to solve problems of thin markets and multiple other challenges. This should not be confined to regional universities.
- The University of California (UC) model does not scale-up to the whole of Australia, which is only slightly smaller in land mass than the whole of the United States. In our submission, the undoubted synergies which exist between the universities in the UC model do not translate to a model for the whole of Australia. The comparison in Australia would be a grouping, for example, of Queensland universities, not the regional universities with all of their diversities and geographic distance. Continuing the analogy, Queensland universities have formed the Queensland Vice-Chancellors' Committee, a grouping of all Queensland universities who meet regularly, work together as a group in activities such as funding applications and advocacy to government, and collectively work with industry and other bodies.
- Most regional universities in fact have campuses which are not "regional" according to a number of definitions - in our case three: two in Ipswich (which we describe as peri-urban) and one in Brisbane. The reverse applies to a number of metropolitan universities with regional campuses. Attempting to merge the regional campuses only, even in some small way, would, in our submission, create unsustainable and unworkable issues which alone would defeat the NRU proposal. Conversely, merging all campuses of regional universities would provide the antithetical outcome of non-"regional" campuses and metropolitan campuses being part of a National Regional University.
- Attracting international students is another stated advantage of the NRU proposal. In fact, our
 experience is the opposite most international students are attracted to city campuses, and would be
 further deterred by the word "regional" in the title of a university, without substantial additional financial
 and other incentives to study there.

In summary, Australia's regions are geographically, economically and socially diverse, with unique issues and challenges. In our submission, a National Regional University would be economically and practically difficult, if not impossible to implement, would be unpopular and unsustainable in the regions, each of which has a

different identity. Further, in our submission, the proposal is not feasible, and has already been thoroughly explored. Putting together perhaps some 10 different institutions, each with significant differences, does not solve the challenges of educating regional students. In our view, peak bodies and organisation groupings such as the Regional Universities Network and the Queensland Vice-Chancellors' Committee already provide the necessary synergies, collaborations and advantages, with none of the disadvantages and unsustainable costs of both amalgamation and ongoing operations, and no diminution of services to regional communities.