

Thank you for the opportunity to write a brief response to the interim report. I would like to offer a few pieces of feedback, focusing on comments that I don't think are included in other responses that I'm aware of.

1. As well as repealing the 50% pass rule measure, I recommend reviewing the system of Census Dates

Although I support the removal of the 50% pass rule measure (for equity reasons), I note that "increased reporting" does not on its own address the issue of the accumulation of student debt from failed unit attempts.

Currently, students are often liable for 100% of unit fees and debt after a financial census date that occurs part-way through the teaching period. This affects students who withdraw (or disengage) from their studies during the study period — and this seems to disproportionately include the at-risk students who were affected by the low-success rate rule.

I wonder whether a single census date might no longer be the most flexible or fair means of determining how higher education institutions should be remunerated and how students should be charged.

Should students, for instance, be charged reduced fees for a repeat attempt in which some assessment marks are carried-over, or charged pro-rata for withdrawals that are after census date but before 75% of the offering period has elapsed?

Some of these systems are driven in part by government reporting requirements, so I would recommend exploring how legislation and the Department can make it easier for universities to offer students financial flexibility.

2. Universal and lifelong learning entitlements

Many mature age students have partially completed degrees that they undertook before they found their eventual career. It might not always be reasonable to expect students (especially those in at risk-groups) to figure out their eventual career at their first attempt.

As I understand it, students currently have an Ordinary Student Learning Entitlement (of 7EFSTL) and additional Lifelong SLE is currently limited to 3 EFTSL, and only 10 years after students commence their studies.

This raises a potential risk for courses with many mature age students — regardless of improvements in how we bring at-risk students through qualifications and into employment, we may soon find ourselves hampered by students' Learning Entitlements being exhausted at previous institutions before they arrive.

In consideration of a new universal learning entitlement, I would recommend reconsidering the limitations around Additional Lifelong SLE — especially for students who have already begun to work in the industries they are now seeking qualifications in.

3. The character of regional universities, and the universal service obligation

For some years, I have been working to improve computer science and IT education at a regional university. To ensure we are financially viable, our student cohort is mixture of regional on-campus students, regional on-line students, mature age students who study online with us while working in their careers, a small but rapidly growing cohort of international students, and many other groups. Our courses are, as I understand it, growing and well regarded.

This mixture of cohorts is itself beneficial — enabling students to see different perspectives on the industry than their own, even within the student body. For example, the presence of experienced

students who are already in their careers in the class is an advantage to regional school-leavers who get to learn from their experience.

- Regional universities do not only offer skills needed *for* regional communities (which could too easily be caricatured as the idea that if you live in a mining town, you should only be able to learn mining) — we also offer skills that regional students should be able to have access to. The concept of recognising regional universities' universal service obligation is interesting and worth exploring.
- The unique value of a regional university should not be limited to its links to local industry, nor only to issues that directly affect their region. Regional universities are also well-adapted to finding and serving under-served niches, bringing them together, and finding ways to adapt education to them. This has value that extends beyond the region.

4. With regards to a National Regional University

There are some aspects of a National Regional University that appear to make sense — for example, amalgamating the contracts that universities separately have with Microsoft and other large providers of relatively standard services such as email.

However, I would be wary of seeking “efficiencies” on the academic side as that could have the unintended consequence of hollowing out rather than enhancing regional academic provision.

Part of the benefit, for example, of computer science in regional universities goes beyond the education that we offer here. By locating computer science in regional areas, government, the university, and academics are also signalling to regional communities a dedication to growing the regions — that if you are a regional youth, interested in a technology career, your first move isn't necessarily to vacate the area and move to the city.

We also (as we serve different mixtures of cohorts) specialise our teaching in ways that are not only about the topics that we offer.

There is a risk that a National Regional University might eventually seek efficiencies by amalgamating academic provision across different regions. This could have the unintended consequence of reducing rather than enhancing academic activity in the regions, exacerbating the metropolitan focus of Australian higher education, and sending a negative signal to the regions.

kind regards
William Billingsley