



THE UNIVERSITY  
of ADELAIDE



University of  
South Australia

# Australian Universities Accord Interim Report

The University of Adelaide and University of South Australia Joint Submission

## Executive Summary

The University of Adelaide and University of South Australia (*the universities*) are pleased to provide a joint response to the Australian Universities Accord Interim Report (the Interim Report).

The Accord seeks to improve the quality, accessibility, affordability, and sustainability of Higher Education, which is in strong alignment with the goals and ambitions articulated for a South Australian university for the future. *Adelaide University* is the new institution that, subject to legislation, would be created by the proposed merger of the University of Adelaide and University of South Australia and its future [vision](#) is captured by the statement below:

*“Australia’s new for purpose university is a leading contemporary comprehensive university of global standing. We are dedicated to ensuring the prosperity, well-being, and cohesion of society by addressing educational inequality, through our actions and through the success and impact of our students, staff and alumni. Partnered with the communities we serve, we conduct outstanding future-making research of scale and focus.”*

*Adelaide University* would be a future-focused university combining the strengths of the University of Adelaide and University of South Australia to deliver nation-leading curriculum and student experience, greater access to education, and world-class research. *Adelaide University* is envisioned to be a contemporary university of global standing, connected to priority industries, and producing graduates with the skills required for both national and international success.

The priorities of *Adelaide University* align with some of the main findings of the Interim Report and with what is required for the sustainability of the Higher Education sector into the future.

The Interim Report, in fact, highlights the current exploration of mergers of universities in both South Australia and Western Australia as *“interesting opportunities, partly driven by objectives of state governments to capitalise on scale to deliver better outcomes for their jurisdictions. While the outcomes of these processes are still to be finalised at the time of writing, it has reignited important debate that could lead to stronger state and national system outcomes.”*

*The universities* broadly welcome the five priority actions recommended in the Australian Universities Accord Interim Report, however, consider that more work is needed to address particular areas of consideration, some of which are outlined in the attachments of this submission.

This joint submission outlines *the universities’* response to the main themes of the Interim Report, as well as how a new *Adelaide University* would be an exemplar of the recommendations, including around the purpose of Higher Education; equity in participation; access and opportunity; excellence in learning, teaching and student experience; meeting Australia’s future skills needs; research, innovation and research training; fostering international education; and funding and governance.

A future university would be formed around three strategic pillars; **Teaching and Learning**, **Research**, and **Engagement** and would be dedicated to ensuring the prosperity of society by addressing educational inequality and driving the innovation and scale needed to make transformational investments in both teaching and research more feasible than they would be for each institution individually.

## **Australian Universities Accord Priorities for *Adelaide University***

The Interim Report outlines some bold, essential, and ‘spikey’ ideas, but for a future *Adelaide University*, the universities recommend the following initiatives are prioritised in the development of the Universities Accord final report.

1. **Structural changes, including governance and funding as well as specific examples such as an Australian Qualifications Framework (AQF) Review, Cooperative Skills Centres and the National Skills Passport**
  - **AQF Review** – This review could support the interconnectedness of the tertiary system through further consideration of extending Commonwealth Supported Places (CSP) at some AQF levels to the TAFE sector, however access to the Higher Education Loan Program (HELP) would need to be part of the discussion.
  - **Cooperative Skills Centres** – These centres could bring together Higher Education, VET, industry and unions to develop and deliver courses that rapidly upskill people in areas of industry need. The future *Adelaide University* could be a pilot site for one of these centres.
  - **National Skills Passport** – A future *Adelaide University* could be an appropriate location for a pilot site for a National Skills Passport. However, consideration must be given to the development and implementation of the National Credentials Platform. Individual universities cannot be expected to carry all responsibility of interpreting and assessing the Passports. Work on the National Credentials Platform has been slower than expected and will need government investment to streamline development and implementation of the National Credentials Platform for a Skills Passport to be possible.
2. **Interconnectedness of the tertiary education system** – This measure supports the national objective to meet Australia’s future skills needs. There is an opportunity for a future *Adelaide University* to be an exemplar in this area, building on existing strengths and working with the Accord Panel to design ways of meeting this objective. An interconnected system would also enable big collaborations and co-location with industry to address Australia’s key challenges.
3. **Access and Opportunity** – Enabling lifelong learning and providing an equitable funding model that underpins a universal learning entitlement.
4. **Excellence in Learning, Teaching and Student Experience** – Scaffolded learning support including support for students’ cost of living, and paid placements, and more flexible pathways into Higher Education.
5. **Research, Innovation and Research Training** – Review of support for research, including structural changes to address inadequate funding and more broadly to attain a national gross expenditure on research and development in excess of the OECD average to secure economic growth and thereby underpin future prosperity and social cohesion.

As the sector looks to the future state, the goals and ambitions articulated for the future *Adelaide University* are well-aligned with the findings of the Interim Report. Both the Accord and the university for the future are designed to improve access to Higher Education and retention, create a destination for leading research and study, and strengthen the foundations of the community through education.

*The universities* believe the focus of the final report should be centred around secure funding and structural changes; the interconnectedness of the tertiary education system; access and opportunity; excellence in learning, teaching and the student experience; and research,

innovation and research training, including an ambition to fund the full cost of research and development of a national industry PhD scheme for established workforce participants in key sectors.

*The universities* recommend the Accord Panel leverage the timing and alignment of the Accord with the proposed *Adelaide University* and develop a close working relationship with the proposed new university, including establishing *Adelaide University* as an exemplar to support some of the final recommendations, as appropriate.

The vision of a future tertiary education system must be dedicated to ensuring the prosperity, wellbeing and cohesion of society by addressing educational inequality through actions and through the success and impact of learners, graduate researchers, staff and alumni. This can be achieved through a strong Accord outcome and supported by a future *Adelaide University*.

## Attachments

- Attachment 1 - Equity in Participation, Access and Opportunity
- Attachment 2 – Structure, Governance and Funding
- Attachment 3 – Teaching and Learning
- Attachment 4 – Research
- Attachment 5 – Engagement

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## Attachment 1 - Equity in Participation, Access and Opportunity

A future *Adelaide University* is positioned to address the Interim Report's findings on the purpose of Higher Education – to serve the community creating stronger links between industry and education as well as setting higher targets for participation and equity.

*Adelaide University* will position itself to achieve higher attainment targets for Higher Education participation and equity. We recognise that this will require attention to expansion of preparatory pathways locally and nationally.

The ambition of *the universities* is that the future *Adelaide University* will be the institution of choice for Australia's First Nations students which will be underpinned by suitably funded support structures and services. The new university will also look to be a leader in providing access and opportunity to these students and drawing on current practices to ensure First Nations cultures and learnings are embedded meaningfully in the curriculum.

*The universities* also endorse **Priority Action 3** to ensure funded places for all Australian First Nations students. A final Universities Accord will need to address cost of living barriers to ensure increased participation is possible and to support lifelong learning. Financial and structural support as well as reducing barriers will support aspiration and potential and ensure diversity and parity of participation.

*The universities* believe **Priority Action 1** needs to be properly evaluated. However, Regional University Centres (RUC) or Hubs are already in place in South Australia in the Barossa, Spencer Gulf and Mt Gambier and support participation, access and opportunity of regional students who want to study close to home. They are also multi-purpose, such as assisting in the upskilling of existing workers and industry in those regions through microcredentials and short courses; as well as touchpoints for pathway students through programs such as Children's University, Open Music Academy, Northern Sound Systems, and allied health and teacher training. In the South Australian context there is a strong case for an extension of this program in outer metro areas.

The purpose of the RUCs could be extended to provide extension work for high achieving students in areas with little university presence and where there is lack of critical mass in individual schools to allow for provision of a class for these students. RUCs could become pathway providers by allowing students from a number of surrounding schools to access higher level learning.

Additionally, there is merit in the idea of a Universal Learning Entitlement if it can support further lifelong learning, however 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.

An important component of establishing a system that facilitates equity is consideration of appropriate support for students undertaking placements or compulsory Work Integrated Learning (WIL) as this often creates an additional layer of difficulty for those students already underrepresented due to structural barriers to participation.

## Attachment 2 – Structure, Governance and Funding

The Accord covers changes to structure, governance and funding that are designed to reshape the Higher Education sector for the future. *The universities* make the overarching comment that universities are important anchor institutions for our communities and society broadly. That strength derives in large part from institutional autonomy which should not be compromised but exercised with a clear view to societal obligations and expectations.

### *Structure*

The structure of the sector in the future is an important consideration. The sector, as well as a future *Adelaide University*, will benefit from an aligned tertiary education system. A new model or framework is required to enable consistent funding models across the sector with equity and access as a key objective, particularly to ensure formalised and embedded First Nations governance and engagement.

In addition to structural changes from university mergers, a new National Regional University is a structural change proposal that needs further review. *The universities* support greater regional presence within the existing system. Australia's regions are geographically diverse and community-distinct, and it is unclear how one National Regional University could support the outcomes it would be designed to achieve.

### *Governance*

It is important to *the universities* that the sector is committed to good governance and that there is scope for the government to reduce regulatory burden and administrative load. The sector needs stability but with the flexibility to be responsive to changing needs, technologies, and priorities.

In terms of governance, *the universities* believe further consideration is required on the proposal for a Tertiary Education Commission (TEC). Although there is support for a depoliticised Higher Education system there are serious reservations about the proposed TEC. The Accord must be very clear about what problem the TEC would be assigned to solve. Additionally, history shows without legislation to protect it, the powers of 'buffer bodies' are limited. It is also not clear what the TEC's relationship would be to eg. TEQSA and the ARC or with government. There is understanding for the need for a body to oversee the Accord and to manage a new Centre for Learning and Teaching Excellence and National Learning and Teaching Committee, both of which are supported by *the universities*. However, there are concerns around a TEC managing 'national governance', pricing and compacts. Further clarification is required to ensure the TEC is not just an additional layer of regulatory burden.

### *Funding*

*The universities* believe the final report should recommend the establishment of a new funding model for Higher Education that is; student-centred, needs-based, helps achieve attainment and equity targets, and strengthens Australia's Higher Education research capacity.

New funding arrangements must recognise the full cost of teaching and re-establish a much better relationship between student contribution and potential future earnings. A future system should also consider differential funding for institutions to recognise the additional costs incurred in supporting the enrolment and retention of non-traditional and equity group students.

*The universities* support the Interim Report reviewing how policy is created and to reflect on the lessons learned from the Job Ready Graduate (JRG) program including the abolition of the 50% fail rule as part of **Priority Action 2**. As acknowledged in the Interim Report, the increased costs of the new contribution rates for many degrees plus increased costs of living and increased inflation affecting student loans is causing unnecessary stress for students and graduates. Various ways of undoing the JRG have been proposed and some need to be explored in more detail. These include adoption of a flat fee for students; a needs-based funding model; or a graduated fee structure based on future earnings – the latter would address equity and access concerns put up against the flat fee proposal. Broader changes to the Jobs Ready Graduates Package will also be required to reverse the trend of falling enrolments for First Nations students if we are to achieve the ambition of 70% of First Nations people having a tertiary qualification by 2031.

It is important that the Accord process also considers the cumulative impact of its final recommendations and ensures a stable funding base is also proposed in order to meet the vision for the future of the sector. For example, funding an increased regional presence should be balanced against the financial pressures of regional students who are required or wish to undertake WIL often at significant personal cost and in locations far from their homes and place of study. A recommendation for the former that does not address the latter is likely to create greater inequity amongst regional students and/or a disincentive to undertake courses with placement requirements, and disincentivises students undertaking valuable WIL opportunities.

## Attachment 3 – Teaching and Learning

*The universities* support the Interim Report’s ambition to achieve excellence in learning, teaching and the student experience.

A future *Adelaide University* intends to:

- Deliver a contemporary, end-user and industry-informed curriculum designed for both domestic and international students.
- Partner with employers to develop innovative skills-focused content including comprehensive work-integrated learning and industry placements, for life-long knowledge seekers.
- Develop a comprehensive, modular, adaptable, and stackable curriculum – providing a digitally rich experience through all modalities of learning.
- Produce career-ready graduates, from all walks of life, by provisioning equitable access and enabling alternative entry modes for learners of potential to a world-class university education.
- Provide all students with opportunities to engage in entrepreneurial activities/training.

These objectives align with the ambitions in the Interim Report to meet Australia’s future skill needs through greater co-design of curriculum and microcredentials, industry engagement, better access to WIL and ties into initiatives such as the National Skills Passport. Although funding for WIL cannot solely be the responsibility of universities.

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.

Additionally, the Student Services and Amenities Fund (SSAF) supports multiple areas of student need listed in the Interim Report as critical, such as student mental health and wellbeing support, prevention of sexual harm, and quality of teaching and international student support. These services require skilled, professional support services and are best managed centrally and consistently, not annually or on an ad hoc basis by student unions. 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.

It is the intention of *the universities* to align teaching and research to deliver industry-integrated programs that address national skills priority areas.



## Attachment 4 – Research

*The universities* believe that research, innovation and research training should be a national priority. Disappointingly, this is not reflected in the Interim Report creating a noticeable gap in such a far-reaching review.

In terms of research funding, *the universities* believe the Accord must include an ambition to fund the full cost of research. Whilst this will not be achieved overnight, there must be a plan for how we migrate towards that ambition in the medium term with some early steps identifiable. COVID-19 showed how important a research ecosystem can be at times of national crisis, and also revealed the alarming extent to which the maintenance of sovereign research capacity is dependent on subsidisation through student fees. *The universities* acknowledge the important role that the once-off uplift in research funding, provided by the Government in response to COVID-19, had in sustaining research capacity and momentum.

A fulsome review of research funding sources, including possible approaches, risks and modelling is necessary. Consideration might be given to restructuring the source of research funding, for example the Research Support Program (RSP) could be restricted to cover funding from the traditional Category 1 schemes. Furthermore, the Medical Research Future Fund (MRFF) could, for example, fund overheads as well as direct costs. Then other Category 2 funding supplied via government schemes could be funded by the specific aligned government departments. There is a pool of RSP funding which is used exclusively and appropriately to support research from schemes such as the ARC and National Health and Medical Research Council (NHMRC). Over time other funding sources such as MRFF, Category 2 funding, and defence related research have grown substantially without a parallel increase in the RSP. Long term, in an ideal situation, there would be an equivalent of an MRFF to assist funding non-medical research, including the overheads. It is important to note, however, that restructuring of this nature could result in an unintended reduction of support for Categories 2-4 schemes, as departments with less funding might not be in a position to fund important research in some sectors, with research funding being seen as discretionary and yearly negotiable.

The Accord should also recommend to Government the need for increasing Australia's level of research and development investment at least equal to the OECD average. Universities can help drive this to get Australia's Gross Domestic Expenditure on R&D (GERD) to 3%.

Consideration could also be given to the potential need for a national Research Integrity Body. Australia's Universities have now adopted well-established policies and procedures that give life to the Australian Code for the Responsible Conduct of Research, and Universities are regularly held to account against these standards by the funding councils and through review by ARIC.

A sector in which education and research are connected in ways which benefit students, society and the economy is what is needed from a Universities Accord for the future. The asymmetry in research investment across sectors also needs to be reviewed to ensure there is adequate research funding for the areas of the economy that need to grow.

A future *Adelaide University* intends to:

- Be globally recognised as a leading future-making research university, tackling global issues that are particularly relevant to the State and Nation, informed by strategic priorities.
- Focus on quality and strong fundamental capability aligned to a strong translation agenda which will secure investment from government, business and private stakeholders.

- Drive in-depth and high-quality research at scale in domains of focus and provide appropriate training support.
- Be highly partnered in our research to assist driving Australia's Gross Expenditure on Research above the OECD average and to at least 3% in a quest to ensure greater economic complexity, economic growth, prosperity and societal cohesion.

These objectives align with the ambitions in the Interim Report to protect research basics, enhance better sharing and translating of research, and support deeper integration of university research within the community, industry and government.

### *Higher Degree by Research (HDR)*

Graduate Researchers in Australia contribute at scale to the delivery of Research Excellence, often being engaged through large-scale efforts including ARC and NHMRC Centres of Excellence, ARC Laureate Fellows and other grant-funded projects. Much of this work is discovery-centred and raises the profile of Australia's research. HDR students in Australia contribute strongly to the reputation that Australia has gained for publishing high-quality breakthrough research.

There is growing awareness of the need for the economy to transition to one based more on value-adding industries. This requires *the universities* to deliver the skilled research workforce Australia needs, in a way that enables these graduates to be rapidly employed not just in academe but also in industry. There is a requirement for a diverse range of suitably trained and skilled individuals, including those who complete their PhD while employed, but also those who undertake internships or other work experience while completing their degree.

A key issue in Australia is that there are not enough organisations who understand the value of a PhD qualification, and this has impacts on graduates being able to navigate career pathways into industry.

The risk as we seek to transition to a value-add economy is that we view research training as an either-or proposition; that we pivot rapidly from discovery to impact. Rather, we need to sustain research excellence based on discovery while also growing research absorptive capacity in industry, by increasing the number and quality of PhD graduates employed directly by industry.

Australia needs PhD targets, however, this must be more than just PhD candidates employed in industry. As outlined in the Interim Report, Australia has recently commenced a formal scheme, referred to as the industry PhD, where PhD students work on problems nominated by industry. The Interim Report suggests Australia could move to educating a significant proportion of its PhD students in this way.

*The universities* support a national industry PhD scheme for people already in work (outside of an internship scheme) to strengthen capability in the Australian economy across key sectors. However, while industry supported PhDs are an important step forward, this cannot be the sole focus of the final report. Industry PhDs are a long-term endeavour. Data on industry supply and demand at this level is needed in order to set and achieve targets as part of broader research workforce planning.

There is also a need for flexibility, program learning outcomes and exit pathways. In terms of diversity, there should be a focus on clear pathways for people with different academic and career backgrounds accessing HDR training.

A fundamental consideration for the future is the incentivisation pathway for the PhD. It is clear that in sovereign technology areas Australia has an over-reliance on foreign talent. As Australia builds its workforce in critical technology areas, it will be necessary to diversify the pipeline of talent to reduce possible impacts in the face of borders again being closed or due to rapid changes in geopolitics. Central to diversification will be the “pull” effect of an increasing number of high-value jobs in industry. However, a case could also be made to immediately re-baseline the minimum stipend requirements for certain areas of critical national importance, so as to lift the equivalent taxed stipend to be above minimum wage levels.

Many students are now completing undergraduate studies with large HECS debts and the prospect of undertaking a minimum of three years of PhD studies on stipends typically set in the range of \$30,000 to \$35,000 is likely to dramatically reduce the number and quality of PhD graduates in the coming years in discovery and industry-linked research. Australia should aim for a research system that includes a PhD stipend of not less than the minimum wage post tax.

*The universities* also believe there is a need to make part-time scholarships tax-free.

The Accord could also examine in detail whether the Research Training Program (RTP) is properly supporting PhD training in the right environments, and to what extent student experience and student completion rates vary across the sector.

## Attachment 5 – Engagement

A future Adelaide University intends to:

- Drive economic growth and greater community wellbeing through the actions of graduates and staff.
- Attract industry and partners to drive commercialised innovation and foster ‘complex’ and sustainable industries.
- Be deeply committed, connected and engaged with the wider community.

These objectives align with the ambitions in the Interim Report to create greater participation in tertiary education and to achieve ambitious growth targets which will need to come from currently underrepresented equity groups. *The universities* have expressed a commitment to educating more students from low socioeconomic backgrounds and becoming a leading educator of students in regional and rural areas as well as the university of choice for First Nations people from across the country.

### *Fostering International Education*

There is an opportunity to better connect education and research activities with trade and foreign relations priorities. Greater dialogue between the sector and government agencies could see Higher Education support engagement in countries and regions where Australia wants to grow its influence over the next 20-30 years, but there is a need to prioritise elevating visibility and ensuring scale. Adequate funding for teaching, research and facilities would enable the sector to focus back on strategic priorities as well as the government’s priorities including in the Pacific, which in turn could contribute to regional stability. An expansion of Australian Scholarships and extension of programs like the Colombo Plan increase diversification of the international student cohort and put diplomacy back at the centre of international education.

*The universities* strongly oppose the introduction of an international student fee income levy. This is an unnecessary tax on international students that will be poorly received in the international market by agents, foreign governments and potential students. Although proper funding of university infrastructure is needed and supported, a tax on international students is not the way to fund it. Rather, a model that supports market diversification, increase in social license, and delivery of a high-quality experience for international students is more likely to achieve the diplomacy objectives outlined in the Interim Report.

Note the G8 London economics report based on 2016 numbers stated:

*“...every 3 overseas students undertaking Bachelor degrees and every 4 overseas students undertaking Master’s degrees by Coursework at Group of Eight universities generate \$1 million of impact for the Australian economy. Taking a weighted average across all study levels, the analysis indicates that there is a total economic impact of \$1 million for every 3 overseas students in attending Go8 universities.”*

The impacts of such a measure would be immense. Australian jobs in the university sector and in the wider economy will be lost if our biggest service export industry is diminished.