To: Professor O'Kane (Chair) and Panel Members

The Australian Universities Accord Review

Dear Professor O'Kane and Panel Members

May I firstly commend the detail and immense volume of work already completed by the Australia Universities Accord Panel, as evidenced in the Australian Universities Accord Interim Report.

With regards to the content of the Interim Report, I respectfully provide the following summary comments for your further consideration.

The two attachments I provide are admittedly unconventional in style in that they are published articles written in a manner appropriate to their readership and publisher (Future Campus).

None the less, I trust that when read their content displays deeply considered ideas regarding Australia's tertiary education system, in particular outlining an approach to practical reform with regards to better integration of its Higher Education (HE) and Vocational Education and Training (VET) sectors.

Whilst I acknowledge the final Accord Report should be, and will be, centrally about universities, I would urge that a separate chapter is prepared on the Key Area for Review 5: "the connection between VET and HE".

My submission (including Attachment 1 and 2) is about this connection. As an ex Managing Director of NCVER, and with long-term experience of both VET and HE policy, I have had opportunity for close observation of both sectors, and their junction, and have repeatedly published on these matters.

My respectful plea is to think bold in presenting reform options, remake the entire ground, don't just plant some encouraging incentives along its current VET/HE pathway.

Therefore, I would respectfully ask the Panel to give their consideration to the following:

- (a) The issues headlined in Attachment 1 form the suite of interdependent policy principles that need to be addressed. Respectfully, the Interim Report did not give sufficiently detailed consideration to:
 - better integrated and more efficient *regulation* of a revised tertiary system;
 - creation of a future integrated and independent tertiary system data and research capability;
 - the rise of non-accredited education/training/skilling being increasingly undertaken by students/employees outside of both the formal HE and VET systems, including corporate proprietary licensing/certifications and other non-regulated upskilling, and how it may be recognised and appropriately connected (mindful of quality) to formal education systems, even at minimum within individual 'skills-passports'.
 - As one suggestion, I suggest a refresh and expansion on the 2017 report by Phillips KPA "Professional Accreditation Mapping the Terrain" should be undertaken, in current day context. The new Jobs and Skills Councils could be tasked to do this across their respective industry sectors and maintain it as national source information; and
 - an efficient means of quantifying industry and private expenditure on education, training and skilling. This is needed if any efficient mix of public subsidy/loan, employer and private funding is to be considered as part of future policy with regards to a 'universal learning entitlement'.
- (b) The Model described in Attachment 2 is an attempt to integrate policy principles outlined in Attachment 1 in 'doable' and managed reform. It is but an example, whatever its merits, that serves to demonstrate what I suggest is a useful approach in your Final Report.

Please consider presenting findings not merely as standalone final Recommendations, but rather think of them as Systems-Enablers. Make clear their integrated coherence, sequenced over a well-structured time frame, with implementation details left to a Tertiary Commission.

Respectfully, the Interim Report as written, left some uncertainty in interpretation of its many multiple 'considerations', what was meant, their scope and how they interconnect.

- (c) My view is that if the Government seeks to so greatly increase HE participation/attainments to the level indicated in the Interim Report, especially inclusive of students from lesser socio-economic backgrounds and the regions, then it needs to fundamentally re-think the present structure and coverage of HE, and make its entry points far better suited to these students. Test the proposition that the bolder you are prepared to be in radically re-platforming the present VET/HE junction and pathway (e.g. Model in Attachment 2), the greater the opportunity for ripple impact across universities generally, for example:
 - greater growth in HE participation/attainments by supporting lower socio-economic and regional students in undertaking a *mix* of education and training, desired by employers, so students can build upon their immediate post schooling achievements with courses better suited to their interests and motivations, so enhancing their chances of course completion and employment,
 - institutional reform, where some (new forms of) institutions may be re-directed towards a required mission of excellence in industry/employer engagement in all its possible elements; and
 - other institutions will have their missions firmly directed at more research-intensive activities in
 making and exploiting new to world research discoveries. This may well mean a sharper spend of the
 limited public funds for research in fewer genuinely world-ranking research institutions, working with
 their global peers and partners.

The less bold you are with regards to reform in Key Reform Area 5, the lower the likelihood of achieving the HE attainment targets, the lesser diversity between institutions and the more the nation will be left with an unmoved status quo, less able to respond to the fast-evolving skills needs of employers. The just released Intergenerational report, yet again, speaks to this and our declining productivity.

(d) The timing of VET Ministers' agreement to the new VET National Agreement (NA) and your final Report is such that the NA may be completed and locked down prior to your final Report. The Panel is asked to consider, if it is to recommend major reforms spanning VET and HE, how and when this is best flagged with VET Ministers to explain such reforms and gain their input, or the opportunity may be lost.

I recognise the enormity and complexity of your task in building university and tertiary system reforms for a more productive and equitable nation. All energy to you and your team.

Yours sincerely

Dr Craig Fowler

JCSF Consulting Pty Ltd

25th August 2023

Attachment 1

Opinion: VET is VET and HE is HE - So How Can O'Kane Meet the Twain?

Introduction and purpose

<u>Kipling's verse</u> "East is East, and West is West, and never the twain shall meet" as an <u>idiom</u> reflects 'when two things ...are completely different, unsuitable for each other, or are unable to agree'. This extreme is not true of Australia's Higher Education (HE) and Vocational Education and Training (VET) sectors. Rather, they are differing, yet connected and complementary sectors that span the post schooling tertiary education system. But it's their connection; why and how the 'twain might better meet'; that matters. This is the <u>Key Area for Review - 5:</u> "the connection between VET and HE" in the ongoing <u>Accord process</u>.

What follows is bold assertions on headline policy elements, plus crude "Twain-scores" from zero to 10 (zero is 'no integration/connection' and 10 is 'fully integrated/seamless') for both current and 'ideal' future state. 'Ideal' is not homogeneity with 10s everywhere. The sectors serve, certainly at their more extremes, very different purpose. It's the tertiary system policy scaffold and architecture that's being critiqued.

Tertiary system - Constitutional rights and sector control Current Twain 3 Ideal Twain 8

State Parliaments gave birth to most public universities, the Commonwealth controls and funds HE. States will not constitutionally hand over VET training to the Commonwealth believing in subsidiarity, but they will 'partner' if they have local autonomy, genuine collaboration with new bodies like <u>JSA</u> and the 10 <u>JSCs</u> and guaranteed training funds in the new 5 Year <u>National Agreement</u> (NA). It will take our Federated political and policy leadership to trustfully 'twain up', imaginatively deal with, and integrate multiple policy issues below, or risk any better tertiary system remaining moribund.

Tertiary system – Australian Qualifications Framework Current Twain 3 Ideal Twain 9

There has been near zero progress in <u>AQF reform</u> implementation. The <u>speculative reasons</u> are that the AQF de facto defines HE/VET sectoral boundaries at their AQF 5/6 overlap and this demarcates the sectors which government(s) control, fund/finance (HE alone or VET shared). AQF reform opens debate about sector relativities, requires a rejig of qualification and credential design, with flow on regulatory changes plus amending legislation, industrial awards and professional standards, all anchored to the AQF. The review anticipated all this. Other experts say reform implementation is <u>urgent</u> and industry <u>agrees</u>.

The next best lesser outcome would be refinement of the AQF to direct institutional processes for recognition of prior leaning, credit transfers and practical rules including on (stacked) short credentials.

Tertiary system – Funding and financing

Current Twain 3 Ideal Twain 10

The Commonwealth does not have fiscal headroom to much expand the tertiary system and already has push back on the impact of HELP loans. Expanded HELP policy is small scale, e.g. loans for <u>young entrepreneurs</u>, and some HE <u>micro credentials</u>. Whilst <u>Fee Free TAFE</u> is undoubtedly generous, coverage is cohort limited. Its first-year tranche of 180,000 places and follow up of 300,000 more over 5 years is, on a per annum basis, ~80,000 over 6 years. Enrolments in <u>nationally</u>

<u>recognised VET programs</u> are ~2.1 million (in 2021), so per annum fee-free might cover ~5%. Universities remain more attractive with recurrent <u>Commonwealth Supported Places</u> (CSP) and HELP loans. Even with the fraught Job Ready Graduates regime, students still 'walk in' at no cost. HELP in VET penetrates to only Diplomas levels and can cost an extra 20%.

The <u>Productivity Commission</u> is unequivocal - Fee Free TAFE is inefficient and only justified in foundational and Cert I/II level qualifications. Think literacy, numeracy and digital fluency for students needing multiple supports to overcome barriers to learning. So any revised national <u>tertiary funding/financing framework</u> must be equity-nuanced, accessible life-long for full or short courses, and straddle both sectors to give students fairer access, sector mobility and remove funding as a major determinant of student choice.

Tertiary system – Institutional structures and types

Current Twain 4 Ideal Twain 8

The revision of the <u>Provider Category Standards</u> simplified types but opted on the side of university status quo, indeed more sameness, rather than encouraging diversity, as <u>one prominent ex VC</u> has <u>long argued</u> is needed. <u>Threshold Standards</u> set benchmarks for university-status research to be 'world standard' (Sec B1.3 19). TEQSA's interpretation of this is now more blinded by the <u>suspension</u> of the planned Excellence in Research for Australia (ERA) and Engagement and Impact (EI) processes.

Institutional access to recurrent CSPs and HELP is pivotal. As a bold/absurd hypothetical, a few dual sector Unis may opt for a revised policy that allowed them to retain recurrent CSPs, the title of University and drop research to be replaced by new measures of 'world-standard' in industry-engagement, e.g. higher-level apprentices as a lynchpin, and so lead a new provider fleet This as a measure is no less precise than 'world standard' in research. Purists will demand university title be retained only for those doing research. All other categories of HE providers would also instantly signal 'me-too' in seeking a slice of the limited CSP pool.

Suggesting a <u>new type of institution</u> is not novel. Commentary on sagging national productivity often points to needing more graduates with a different contemporary mix of knowledge/tech-skills/nous/teaming typically at, or adjacent to, current AQF 5-6, i.e. associate degrees/diplomas and undergraduate certificates.

<u>Policy research</u> in NSW led to new hybrid <u>Institutes of Applied Technology</u>. The proposed network of <u>TAFE Centres of Excellence</u> also appear structures for industry-specific engagement and skilling e.g., <u>AUKUS</u>.

Tertiary system – Regulation of education and training activity Current Twain 3 Ideal Twain 9

Recommendation 43 of the <u>Brady Review</u> was for one tertiary regulator. The nation got two (not in Vic and WA). Dual sector Institutions seek now to be <u>covered only by TEQSA</u> (even if overwhelmingly delivering VET). Annual Reports indicate ASQA and TEQSA have an MoU on <u>information exchange</u> and seek <u>to stream line</u> processes e.g. CRICOS and dual sector regulation. As Statutory Authorities they could be directed to merge all corporate functions and unify all IT infrastructure and systems, plus staff development. The future would be one Board, multiple leadership Commissioners of two divisions in one entity, with modest cost savings.

One controversial stumble stone. There are <u>~3,500 RTOs</u> and <u>~200 registered</u> HE providers nationally. There is need to analyse VET provider market structures, recognising across the sector that student completions and satisfaction is as good if not better at quality <u>private RTOs</u>. This

inquiry may lead to no change, or RTO-led and government supported consolidations. Fisheries ministers do sometimes buy back fishing licences.

Tertiary system - Educational products/content

Current Twain 2 Ideal Twain 7

Given their funding/financing power, universities over the last decade have deeply penetrated a breadth of fields of education in vocationally oriented courses, at bachelor/sub bachelor and micro credential levels. They have not entered VET courses covering high risk licenced occupations and trades but have some 'higher level' apprenticeships. An ex-Vice Chancellor laments all this as gross inflation of degrees.

The second reason is that universities and limited HE providers have self-governance to approve their own courses, including working with industry in instances of course professional accreditation. They evolve and adapt as fast as their Academic Senate approvals allow.

The VET sector has had a very different experience. The positive view is that VET Training Package (TP) qualifications have led to consistently constructed industry and job specific standards, nationally recognised transferable qualifications and, in recent years, fewer TPs and an accelerated effort to ensure these qualifications were up to date with skills needs of employers. The now <u>closed AISC</u> diligently led this work.

The alternate view is that of a widely impacting, costly and monumental public policy failure. The AISC-led/ISC/SSO regime outputs were increasingly seen as excessive, duplicative, rigid and unfit for purpose, with real-world job skills accelerating away from decliningly relevant training products. Industry may now be disillusioned, but RTOs remain hugely burdened by implementing change and frustrated their expertise and input has been long excluded. TAFEs especially, want course self-accreditation. Much depends on cooperation between RTOs and new JSCs in any new training product reform set up.

Working with JSCs, an agile mechanism of course self-accreditation could be trialled with proven quality RTOs, akin to the regulated model used in the HE sector.

Tertiary system - International

Current Twain 8 Ideal Twain 10

Whilst there have been oscillations in policy (due to Covid) and ongoing contest over visas, on education to migration opportunities, skills in demand lists, country and provider risk rating, provider burden and agent quality - in overall the <u>ESOS Act</u> and <u>CRICOS</u> etc. has been sustaining and effective. It has underpinned vast non-government revenue, especially for universities, and supported international linkages and relations.

Tertiary system – Data and research

Current Twain 3 Ideal Twain 8

The VET sector has been serviced for decades by a Ministerial company (NCVER) providing authoritative, independent, reliable and informative VET data and research. The HE sector relies on the output/timing of data from the Cwlth Education agency and contracted <u>QILT surveys</u>. It took 6 years for the USI introduced in VET (2015) to be mandated for use in HE (2021). There is public release of HE performance at a provider level, in VET there is not. Data standards and systems also differ. One fully independent Authority is possible.

Tertiary system – Policy leadership and authorities

Current Twain 2 Ideal Twain 9

Since 2000 there have been <u>~8 iterations</u> of an education department in the Australia Government all wrought by machinery of government changes. There has been pop up and abandoned advisory bodies, like Australian National Training Authority, Skills Australia, Australian Workforce Productivity Agency and now Jobs and Skills Australia. Current disgruntlement with extant bureaucracy leads to the <u>Go8 recommending</u> two new independent bodies, a Tertiary Education Commission and National Agency for Research and Innovation. Such Commissions risk role confusion and cost, based on <u>NZ experience</u>. But the Go8 is right that the HE and VET sectors need to have better overarching governance as an integrated tertiary system.

Warning: Both HE and VET sectors are being overrun by non-accredited education/training; both good and bad quality; accessed globally mostly online by individuals and corporates. Disruption has bolted and any fixation on formal educational sectors being sufficient to fix national skills is wrong. Quality non-accredited training and industry-proprietary certifications, need to be tracked, detailed and leveraged into any reforms.

In Conclusion

Laud or laugh at assertions and scores, a few may meet O'Kane's <u>'bold-big ideas'</u> test. Regardless, the purpose was to consolidate headline policy elements, demonstrate overlaps, and flag integrated solutions. Enthusiasts for Twain-scoring can assess future O'Kane Accord recommendations, when published, with regard to its <u>Key Area for Review - 5:</u> "the connection between the VET and HE ...ensuring a cohesive ...tertiary education system".

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Future Campus 12 July 2023

Attachment 2

'Twain-Gain Pt 2': HE Accord 'Considerations' are Great, What About 'Model Solutions' State of Play - HE Accord Interim Report

The central thread in the Australian Universities Accord <u>Interim Report</u> is 'growth for skills through greater equity' (pg.1), proposing a major increase in future HE participation and attainment levels (pg. 37) with ~60% of this growth needing to be from equity/regional students (pg.40) to reach their population proportionate share. This is woven with multiple sub strands: 'universal learner entitlements' (pg.43); 'student centred needs-based funding (pg.113); an 'integrated tertiary system' (pg.20); 'progressing the AQF review' (pg.57) so providing a new scaffold from which existing/new qualifications (pg.10) may be linked; with emphasis on courses aligned to industry/student need (pg.45) and more just-in-time-just-as-needed stackable credentials.

The Interim Report, referencing its echidna imagery, sets out its array of 'spike' issues in a logical and lucid pattern, but it falls short on new 'spikey' ideas. The many 'further consideration' statements (pg.8), which in in aggregate may give momentum to ten possible 'system shifts' (pg.20), are mostly well trampled ground.

The Final Report will bring fewer, sharper recommendations for Government/Treasury to consider. It is a given from Minister's statements that outcomes will be underpinned by Government's clear philosophy to lift HE participation for 1st Nations people, lower socio-economic groups and regional students.

A reformed and better integrated tertiary system is foundational to improved productivity

The ambitious 'big-goal' of a 55% HE attainment target by 2050 (pg.38) needs to be detailed and better justified, as the Report *itself* says: "An overall *tertiary* attainment target is appropriate as both VET and HE will need to play a role in meeting future skills need. A national target could be a mechanism to draw the tertiary system together in pursuit of a common goal" (pg.42).

Making *very* long-range forecast projections to 2035 and 2050 (pg. 36-37) for HE attainments, based on a retrospective structural view of a separate HE sector, is oddly inconsistent with headlining a future ambition of a more integrated tertiary system and setting *tertiary* participation/attainment targets (pg. 9).

Critically, if such growth in HE participation/attainment is to reach population parity, on socioeconomic and geographic measures, the preparatory role of schooling, VET and HE enabling studies in ensuring all students are educationally ready to start HE requires a vastly improved performance in these pipeline pathways.

The PC's review of the past HE <u>demand driven system</u> found growth in student numbers had included many of lesser literacy and numeracy, a predictor of greater student attrition, and a contributor to HE participation gaps between equity and non-equity groups. Norton <u>cautions</u> that for some most disadvantaged students, "universities are, in their admissions practices, already operating at the edge of what is <u>legal</u> and ethical".

A <u>Bill</u> to improve academic/non-academic student supports at universities is proposed, consistent with the Accord Priority Action 4 (pg.7). This recommends directing resources to 'wrap around'

support for HE students - a term long owned by VET, long wanting recurrent resources for just such purposes and people.

This is not a VET-sector rant born from 'HE sector-envy' - it is a rational economic/social and opportunities costs question about best investment of public funds. Why is investing in extra CSP places to reach 55% HE attainment by 2050 (pg. 37) the preferred policy option, as <u>critiqued</u> by Norton, and *if that is* the proposal, what investments are to be made in the school/VET/HE enabling/digital capability student pipeline? The Model below only starts to tackle this.

A Model solution - Bolting together multiple Accord 'Further Consideration' elements

The Model below follows the policy elements of the prior O'Kane/Twain paper. It is pragmatically cast by asking: "what does it do, what must it do and what else will do" in fashioning a 're-build as you fly' reform.

Core Proposal – A 'Twain Plan'

A new sector will be established and promoted, called for the sake of a better name, the JET sector (joined education and training), built as a wide highway (not a pathway) between current VET and HE sectors. The past convention of an AQF 5-6 VET/HE 'overlap' will be abolished, replaced by JET and founded by default on existing HE policy, but amended to specific purpose. The Model underpins the expected decision to increase HE attainment to 55% by 2050, allowing JET-attainments to be therein counted, per OECD practice (pg. 35).

Federal relations and Constitutional issues

State Ministers must let go of VET at AQF 5-6. VET Dipl./Ad. Dipls. constitute ~15% of all 2022 VET program enrolments and ~10% of government funded. When the Australian Government (AG) first provided loans for VET at AQF 5-6 it was agreed in the <u>VET National Agreement</u> - States did not object. Such loans started as being only for 'articulation' of VET to HE. This all fell into the VET FEE HELP failure when fully opened to VET.

JET funding and financing

This would be based on the existing CSP/HELP regime to cover teaching costs. Part of any resources directed at a 55% attainment target would be allocated to JET (and counted as HE). States would not contribute to any loan expenses or <u>debt not expected to be repaid</u> (as with VET Student Loans). If the AG did not want to fully fund the needed CSP (and the student carries more HELP loan), States could provide CSP-supplementary funding, investing in their priority JET courses. Alternately, the AG would retain part of current VET National Agreement funds to help cover JET-CSP costs.

A key *new* policy decision needs to be made allowing funding/financing of not only full JET courses, but also short or micro-courses offered in JET, and to what limit i.e. if and at what point, should subjects/short courses be only a private tax deductable expense?

<u>Universal learning entitlement (ULE)</u>

Universal implies a full tertiary wingspan - JET would eventually plug into any new ULE. The options and intricacies of ULE applied in a university setting have been <u>detailed</u> by Norton, as well as funding options for <u>institutional allocations</u> and possible moderations for <u>student characteristics</u>. Independent Higher Education Australia lobby for a student-centric model based on life-long access

to a mix of public subsidy and loans, redeemable by students at their chosen provider – but don't call it a voucher.

The VET world experience of 'entitlements' is deep and colourful. Once States decided VET entitlements for all students to at least Cert. III were not fundable, a multitude of different refinements were adopted across jurisdictions for optimal use of available public funds: 'subsidy-levels/caps'; 'priority courses linked to job needs/skills'; 'full quals. only or +/- skillsets and subjects'; 'number of courses/fails' (student 'bites at the cherry'); progression up, lateral or down the 'AQF ladder' based on prior attainment; access to 'loans' (above); or contracts only to quality VET providers. ULE will be tough to agree with a *full* tertiary wingspan.

JET and the Australian Qualifications Framework

In the <u>AQF Review</u> this space was called the VHET zone and it bundled proposed 'Advanced Vocational Certificates, Diplomas and Associate-Degrees'. JET will comprise all current AQF 5-6 level qualifications, HE and VET, including the newer Undergraduate Certificate (pg. 55), plus any arising from 'progressing' the AQF Review' (pg.57). Any roll in of Cert. IVs into JET is a far, far bigger ask and must await reform progress.

Things now get more challenging, but there is clear Ministerial leadership, who <u>stated:</u> "improving the integration of HE and VET... includes creating new types of qualifications that combine both". So how?

JET focussed - educational products, qualifications reform and course accreditation

In JET, the existing VET Dipl./Ad. Dipl. qualifications would be phased out, seeking the advice of the new <u>VET Qualification Reform Design Group</u>. Training Package qualifications at current AQF 5/6 would then no longer have primacy and JET qualifications could be developed/licensed by single or joint HE registered providers. Industry input would be mandated, building on existing structures. Universities have multiple professional course accreditation practices with industry bodies (pg. 45) and would retain self-accreditation in JET.

The new <u>Job Skills Councils</u> (JSC) would provide advice to all JET providers plus give an independent view on course suitability (and identify duplicates) to TEQSA, who would be responsible for course approval for non-self-regulating providers. As is present HE policy, strong providers may ultimately win self-accreditation. The intent is to deliver the next evolution of industry association, course accreditation, ongoing professional development requirements to better address skills gaps, and minimise regulatory requirements.

JET focused - qualifications design, 'stacking' and national credit recognition

An independent Expert Group - recruit those who drafted the <u>Australian Microcredentials</u> <u>Framework</u> - must advise on: Guidelines for JET qualifications/short courses reform, detailing structures of hybrid HE/VET courses, re-present Guidelines on how micro credential and short course packaging/stacking/recognition will work when these are aggregated up as new national JET courses, and write nationally applied Guidelines and Rules for *cross-tertiary* credit recognition of JET qualifications. TEQSA will receive an annual declaration and statistics, legislated if required, that all its regulated institutions operationally comply with national credit recognition requirements. Later the same group could advise on content within any Skills Passport.

JET focused - Institutional structures overseen by one regulator TEQSA

JET sector providers must be one of the existing HE provider types, these including university-subsidiary colleges, most TAFEs and private providers of HE. JET sector providers could work in agreed consortia, like Cooperative Skills Centres (pg. 58) with industry partners and JSCs. These consortia would be funded under an expectation to pursue novel hybrid education/training outcomes, e.g. 'higher' apprentices.

Safeguards and risk - integrity/quality

Registration under TEQSA should be sufficient and apply equally to all JET providers. But governments do deal with risk and public accountability. In 2021 only 146 approved VET providers accessed <u>VET Student Loans</u>, supporting ~40,500 students and ~43,500 enrolments. The top 10 courses (of 218 in total supported) accounted for ~50% of enrolments, with Nursing ~40% of the top 10. Without complementary CSP funding, student uptake is skewed and plainly stunted. Policy needs to now step over the old VET FEE HELP saga.

In closing

Critics may say all this just moves the VET/HE boundary to Cert IV. Yes, but it removes the odd anomaly of HE/VET AQF overlap. The Model is a calculated trade off in gaining practical reform, needing all players to make friends with new ideas, but not overreaching to get flat out opposition. It is evolvable as reform elements play out (e.g. ULE). Lastly, in 'rebuild while you fly' mode, there is little payback for a better integrated tertiary system by meddling with parts way outside the current AQF 5-6 flaw.

This JET Model can all be shot down as dross - fine. But soon all the Accord's moving jigsaw parts - many labelled 'vested interest' underneath - have got to come together as a coherent, stable, integrated master policy with an implementation plan that allows for system continuity amidst reform. The Accord Final Report needs to at least contemplate doable models that integrate the moving parts it has so comprehensively identified. Nor can its recommendations just be shoved to a new Tertiary Commission to be solved later.

So, what of that <u>echidna</u>. As egg laying mammals they have the second lowest body temperature of all mammals, have 'oh-so-slow' metabolism, a dawdle speed of 1 and a top of 2.3 km per hr. Much like the woefully ponderous pace and agility of Australia's tertiary-system policy reforms.

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