Response to Universities Accord Interim Report

Prepared by: Dr. Sharon Schembri Dean, Higher Education

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Executive summary

The Universities Accord Interim Report puts forward 'spikey' ideas designed to achieve the bold, system-wide and long-term change that is essential in Australian higher education. The overall goal of reform is *growth for skills through greater equity*, which implies an emphasis on increased access and improved equity. Increased access and improved equity can be effectively achieved with a stronger integration of TAFE institutions in the tertiary education system.

Widening participation is a stated priority and particularly for underrepresented minorities such as First Nations people, lower socio-economic groups, people with disabilities and those from rural and remote regional communities. Acknowledging the need for a high-quality higher education system is now essential for Australia, the Report also recognises the need to strengthen engagement between higher education and Vocational Education and Training (VET) sectors. A specific measure indicating the success of this intended priority includes the number of students transitioning from VET to higher education.

Given the TAFE network collectively offers an established national system of infrastructure and resources, the TAFE network as a unified system can effectively operate as a National Regional University. Utilising TAFE campuses across the nation also effectively provides an efficient means of access to rural and remote regional areas. TAFE campuses throughout the nation can therefore operate as Regional University Campuses, or study hubs.

In utilising the national TAFE system for the benefit of higher education and dual sector institutions, allocation of Commonwealth Supported Places (CSPs) to Tertiary Education Quality and Standards Agency (TEQSA) accredited TAFE institutions offering higher education programs is an effective strategy to widen participation in higher education. Many students, without an ATAR, choose to begin furthering their education via a VET qualification. Many students then choose to transition from VET to higher education. Yet, students choosing to study a higher education degree within a TAFE institution are financially disadvantaged given TAFE institutions are currently not eligible for CSP. This glaring inequity requires adjustment.

Inequities for dual sector institutions including TAFE institutions are also evident with regards to regulatory requirements. Dual sector institutions, such as TAFE Queensland are subject to both TEQSA and Australian Skills Quality Authority (ASQA) regulatory requirements. This additional burden particularly applies to dual sector institutions and especially so for non-self-accrediting TAFE institutions such as TAFE Queensland. Granting self-accrediting authority to low-risk TEQSA accredited higher education providers, such as TAFE institutions, would be highly beneficial and is recommended.



Part 1: Immediate Actions **Priority Action 1:**

Extend visible, local access to tertiary education by creating further Regional University Centre (RUCs) and establish a similar concept for suburban/metropolitan locations.

The creation of RUCs, or new tertiary study hubs, is a strategy put forward to widen participation in higher education, especially for students in rural and remote regional areas and/or from low social-economic backgrounds. Establishment of the RUCs or hubs is recommended to be driven by community need and to incorporate tailored, wraparound support to facilitate student success.

A way to enact RUCs in an efficient and effective manner is to embed the intended study hubs within the current national TAFE network. Rather than establishing new RUCs or additional hubs, TAFE campuses can be positioned as study hubs with established facilities and resources operationally managed with existing processes. This approach will enable national reach including rural and remote regional areas and will effectively widen participation while also providing the necessary student support services that TAFE institutions are well known for. TAFE Queensland, for example, has more than 60 campuses stretching across from Thursday Island, Innisfail and Ingham to the Whitsundays and out to Mount Isa, then from Bundaberg to Kingaroy including Hervey Bay, Maryborough, as well as Chinchilla, Dalby, Gympie and Cherbourg. In addition, there is a concentration of campuses across the Gold Coast, Sunshine Coast and Greater Brisbane regions. As established TAFE Queensland campuses, these 60+ campus locations are equipped for study purposes and in many cases, integral to the community.

More than geographic network coverage, however, positioning TAFE campuses as higher education study hubs strengthens the engagement between VET and higher education sectors. The TAFE network in general, has a high priority on providing tailored student support. This means student support mechanisms and processes are already in-place and operational. Providing wraparound student support to ensure student success via the TAFE network enables a synergy that can be achieved through an established system.

While some TAFE institutions, such as TAFE Queensland, are TEQSA accredited higher education providers, most TAFE institutions are leading VET providers. As leading VET providers, TAFE institutions offer a large pool of prospective higher education recruits. TAFE Queensland for example has more than 130,000 students, state-wide. More specifically, TAFE students can be generally described as first-infamily, from low socio-economic backgrounds and highly diverse. Utilising TAFE campuses as RUCs and/or study hubs enhances the opportunity to widen participation in higher education.

The Interim Report mentions (p14) consideration of a National Regional University. Reinforcing the suggestion that utilising the TAFE network is an efficient and synergistic way to widen participation and effectively reach rural and remote regions, collectively, the TAFE network can effectively operate as a National Regional University. Benefits here include building on a trusted educational system with strong industry and community connections.





Priority Action 5:

Through National Cabinet, immediately engage with state and territory governments and universities to improve university governance.

Advocating a modern approach to regulation, the Interim Report recognises the need to better align regulatory architecture across sectors to reduce unnecessary duplication and burden. The recognised critical intersection between TEQSA and ASQA calls for greater convergence between these regulatory agencies. More specifically, the Report (p110) flags consideration for dual sector institutions and selected TAFE institutions that meet minimum threshold standards to be registered with only one regulatory agency.

As stated in the Report (p109), additional burden is particularly noted for dual-sector providers who are subject to both TEQSA and ASQA regulations. This recognised burden for dual sector institutions is evident in the duplication of governance and administrative obligations that both TEQSA and ASQA require.

As a premier VET institution that is also a TEQSA accredited higher education provider, TAFE Queensland is an example of a small, low-risk provider that is subject to this identified burden. As a TAFE institution, TAFE Queensland is also a non-self-accrediting institution. Unlike universities that are self-accrediting, non-selfaccrediting institutions are further subjected to increased regulation. A regulatory shift from TEQSA to a tiered approach for reporting requirements based on provider risk will be welcomed by small, low-risk providers such as TAFE Queensland.

In shifting towards a more aligned tertiary education system, VET would be better integrated. More efficient and effective integration of VET into the tertiary education system would improve the process for students transitioning from VET to higher education. Similarly, improved integration of VET into the tertiary education system will also facilitate transition from higher education to VET. Given the strategic intentions across higher education to widen participation and meet growth projections, removing any impediments and unnecessary burdens for dual-sector institutions seems pertinent.

To that end, enabling dual sector higher education providers such as TAFE institutions to be self-accrediting is recommended.



Part 2: Areas for further consideration

A: Putting First Nations at the heart of Australia's Higher education system Improving higher education access and outcomes for First Nations students requires a multi-pronged approach. Recognising that Indigenous students may be less likely to obtain an ATAR and more likely to enrol in VET rather than higher education (Frawley et al. 2017), facilitating VET to higher education pathways needs to be streamlined and particularly so in rural and remote regional areas. This translates to a higher interest in lower level qualifications rather than direct entry into higher education. Yet, the potential for widening participation via VET to higher education pathways remains largely unexplored.

In 2008, the Bradley Review (Bradley et al., 2008) identified the required connection between VET and higher education to successfully achieve national higher education participation targets. Similarly, the Behrendt Review (Behrendt et al., 2012) emphasised the importance of VET and higher education sectors to enhance Indigenous student participation in higher education. Yet, there has been little progress in this regard.

NCVER (2023) data shows 6,070 Indigenous students enrolled in TAFE institutes, whereas university Registered Training Organisations (RTOs) have just 915 Indigenous students enrolled. Australian Bureau of Statistics (ABS) (2018-19) data identifies that between the 2001 and 2016 Census, the proportion of Aboriginal and Torrs Strait Islander students attending non-school institutions increased from 21,741 to 34,302 students. As well, 2001-2016 Census data shows Indigenous students studying at universities and other tertiary institutions increased while those studying full-time decreased. In 2021, 19,230 Indigenous Australian completed a VET qualification and in 2018, there were 18,062 Indigenous higher education students with the proportion of Indigenous adults engaged in study decreasing relative to the remoteness of their residence (Australian Institute of Health, 2023). These statistics confirm Indigenous students have an appetite to further their education, preferably at a VET entry level with remote students requiring extra support.

Given the TAFE Network has extensive access to rural and remote regional areas, there seems to be multiple benefits and synergism that can be achieved by streamlining the VET to Higher education pathways in collaboration with TAFE institutions. The TAFE Network can be integral in facilitating this intended VET to higher education streamlining strategy. The extensive coverage of the TAFE network can also be utilised to encourage Indigenous students to take on a VET qualification. From there, progressing them to higher education can be designed and implemented as a widening participation strategy.

B: More students enrolled in higher education, a fair system that ensures access and attainment and a larger system that better meets national jobs and skills needs

A strategy to widen participation in higher education is a strategy to maintain Australia's competitiveness in the global market and sustain national jobs and skills requirements. More than that, widening participation in higher education is a social justice and social inclusion issue (Beckley et al., 2016). Currently, not all Australians have equitable access to higher education and underrepresented minorities such as



Indigenous students and those from low socio-economic backgrounds are statistically shown to be particularly impacted (Macaulay, Webber & Fraunholz, 2023).

TAFE institutions are differentiated from traditional higher education institutions and offer distinct benefits to Indigenous and non-traditional students seeking to further their education. TAFE institutions enable prospective students the opportunity to begin their studies with lower level qualifications and then gradually advance through the AQF levels, should they so choose. Therefore, the first step for beginning students is less daunting and admissions criteria less demanding. This less daunting and demanding starting point potentially accommodates prospective students who do not have an ATAR or a high school certificate. Success with lower level qualifications builds students' confidence and may motivate them to investigate possible next steps in their learning journey (Beckley, Netherton, & Barber, 2018).

There are also several community benefits generated by students choosing to begin their studies at the VET level rather than higher education. Completion of a VET Diploma, for example, means that students achieve useful and employable skills that enable early engagement in the jobmarket via paraprofessional work and a fasttracked contribution to the skilled workforce. Another community benefit generated by students transitioning from VET to higher education is the flexibility of work-study patterns. Choosing to complete a VET qualification and then transitioning to higher education at a later date allows flexibility, in coping with, and managing the various study options. Many students experience unpredictable life events as well as regular lifecycle phases that interrupt their studies, or intentions to study. Flexible options with regards to moving between the VET and higher education sectors for the purposes of life-long learning, need to be readily available and built into the system.

Institutions may also work to deliberately raise awareness of pathways to higher education for example. As an exemplar institution, TAFE Queensland partners with 16 higher education providers throughout the nation to offer 550 articulation pathways across a wide range of discipline areas.

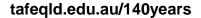
Improving equitable access and widening participation in higher education can be achieved with an effective strategy to demystify and streamline VET to higher education pathways. TAFE Institutions are critical to achieving this goal. The breadth and scope of the TAFE Network can also facilitate reach into rural and remote regional areas.

C: Meeting Australia's future skills needs

Unlike a traditional university, TAFE institutions predominantly focus on practical skills in vocational education. Accordingly, TAFE graduates are skills focused rather than scholarly focused graduates. In 2008, the Bradley Review identified the required connection between VET and higher education to successfully achieve national higher education participation targets. Similarly, the Review is investigating ways that Australia's skills needs can be met with the higher education system working with an expanded VET system, where TAFE institutions are at the core.

For this reason, the Review is further considering extending CSPs at some AQF levels to the TAFE sector in areas of crucial skill need.





This point is very important given the current inequities in funding for students who choose to study a higher education degree at a university and students who choose to study a higher education degree at a TEQSA accredited TAFE institution offering higher education courses.

While traditional universities are funded with research and teaching grants and student fees supported by Government subsidies, or CSP, universities venturing into the dual sector space also have access to VET funding provided by respective state and territory governments. Yet, VET providers offering higher education are generally excluded from CSP in accordance with the *Higher Education Support Act (2003)*. This inequity in funding access for TAFE institutions offering higher education gualifications means that students who choose to study at the Bachelor level at TAFE are disadvantaged.

TAFE institutions offering higher education qualifications is key to widening participation in higher education. This point applies especially with regards to reaching rural and remote regional communities. Without equitable funding however, the quest to widen participation is constrained.

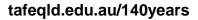
Providing equitable funding opportunities across the higher education sector that includes TAFE institutions offering higher education qualifications will encourage a widening of participation in higher education and the VET to higher education transition will be better facilitated. More than that, TAFE institutions are well placed with regards to the development and delivery of adult literacy and digital skills necessary for the future of work. Such skills can be embedded in higher education qualifications provided by TAFE institutions.

The Albanese government establishment of Jobs and Skills Australia also points to the need for the higher education sector to deliver skills not scholars. Applied learning is the point of differentiation that TAFE institutions offer in the higher education market. The strong industry alignment and partnerships that currently exist within TAFE institutional networks enables degrees to be co-designed with industry in a way that universities can only aspire towards. Accordingly, some higher education deliberately choose to undertake a VET qualification to ensure they have the appropriate skills required to be job ready.

TAFE institutions are also well versed in the delivery of an apprenticeship model. As Bean and Dawkins (2021) advocate in their Review of University-Industry Collaboration in Teaching and Learning, work-based learning in the form of cadetships (higher-level apprenticeships) is a key initiative. TAFE institutions can facilitate the design and delivery of such cadetships. The cadetship model is well established in the UK for example and Australia can choose to embrace the cadetship model as a mechanism to align the development of skills and education. Equitable funding across the higher education sector will greatly contribute to the successful establishment of this initiative and will generate a workforce that is skilled in recognised priority areas.

As recognised in the Interim Report (p1), too few Australians hold higher education qualifications. To achieve the goal of 55% of Australians completing a higher





education degree, an additional 300,000 CSPs are required by 2035 and 900,000 by 2050. As stated in the Interim Report (p36), this growth in CSP is far beyond projections provided by the Department of Education under existing policy settings. Growth in Australian Higher Education is now expected to reach one million CSP in 2035 and 1.2 million in 2050. Even partial allocation of these required CSPs to TAFE institutions will effectively widen participation and facilitate more of a seamless transition for students advancing from VET to higher education.

There is an urgent need to remove the current financial disadvantage for nontraditional students who choose to study a higher education degree within a TAFE institution. There is also a demonstrated need to better facilitate and encourage the transition from VET to higher education. Equitable allocation of CSP throughout the dual sector will enable a level playing field between universities and TAFE institutions offering higher education qualifications. Enabling TAFE institutions access to CSP will also effectively widen participation and provide improved access to rural and remote regions. CSP allocations for TAFE institutions will also facilitate improved transition between VET and higher education. More specifically, measuring and tracking the number of VET students transition into higher education can be an indicator of higher education widening participation.

As stated on p9 of the Interim Report, "Australia's skills needs will only be met if the higher education system and an expanded VET system, with TAFE at its core, work together."



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