

Professor Mary O’Kane
Chair, Australian Universities Accord
Australian Government Department of Education

Thursday 31st August, 2023

Dear Professor Mary O’Kane and the Australian Universities Accord Panel,

Thank you for the opportunity to respond to the University Accord’s Interim Report.

We would like to commend the panel on the boldness of the ‘spikey’ ideas, a commitment to an inclusive higher education system for all students and for shifting higher education policy so it is driven through a lens of student equity, as opposed to equity being a construct that sits on the side of higher education policy. We strongly endorse the immediate action of the five priority areas and provide further considerations for the Accord Panel below.

This Equity Practitioners in Higher Education Australasia (EPHEA) submission is informed through sector-wide consultation with higher education practitioners in student and staff facing equity, diversity and inclusion roles. EPHEA, representing over 800 members working in higher education, puts forward the following four key recommendations for consideration of the Accord Panel to inform the Final Report:

1. Role of the Equity Commissioner.
2. Stronger governance and accountability for universities in their commitment and effectiveness to enabling students to access, participate and complete their higher education studies.
3. An enhanced model for Widening Participation.
4. Establishing priority learner groups.

(1) Stronger Governance and Accountability of Universities in contributing to an accessible and inclusive higher education system

Accord Interim Report Recommendation: *“A Tertiary Education Commission could protect and promote student voices, in light of the new, student-focussed vision for the sector, including the role for a new Equity Commissioner” (page 114).*

There has been limited accountability for universities by the Federal Government in the implementation of the Higher Education Partnership and Participation Program (HEPPP). The Higher Education Other Grant Guidelines have provided guidance to the sector for the use of HEPPP funds specifically to increase access and participation for students from low socioeconomic backgrounds. However, HEPPP has often been used across the sector to support marketing and recruitment activity, as well as fund core support services for all students that should be funded by universities operational budgets. There is a need to create increased accountability and monitoring of higher education institutions by the Department of Education to ensure systemic changes to widening participation, teaching and learning and university support services are being made.

Recommendation 1: Role of the new Equity Commissioner

EPHEA supports the proposal of a new Equity Commissioner, as part of the Tertiary Education Commission and proposes that this role would:

1. Develop a National Student Equity Strategy, building cross-government partnerships across the entire education ecosystem, from early childhood through to lifelong learning and beyond.
2. Develop a National Student Priority Learners definition from early childhood through secondary and tertiary education.
3. Monitor national progress (and adjust the National Student Equity Strategy) towards population parity (as a national target) for ‘Priority Learners’ across the access, participation, completion and employment phases of the student lifecycle.
4. Establish an Advisory Board, with representation from equity focused affiliated organisations (including ADCET, EPHEA, NAEAA and ATEND), peak bodies, equity focused research centres, practitioners and students to ensure diverse perspectives and voices are represented and heard.

Recommendation 2: Stronger governance and accountability for universities in their commitment and effectiveness to enabling students to access, participate and complete their higher education studies.

In order to increase accountability for universities, the following mechanisms should be implemented by the Equity Commissioner:

1. Universities submitting Access and Participation Plans, as part of their Mission-Based Compacts that are rigorously reviewed and provide support through the National Centre for Student Equity in Higher Education (NCSEHE) where universities need to make improvements to their approaches.
2. Contextualised targets established for universities.

3. Clear parameters for the monitoring and evaluation of university expenditure of government funding, ensuring that funding is directly attributed to learner needs.
4. Retention, success and graduate employment outcomes for priority learners are included in QILT data.
5. Universities are incentivised to support students through to completion of their studies.

(2) An enhanced model for Widening Access to Higher Education

Accord Interim Report Recommendation: *“Supporting aspiration and potential: a. aligning and improving outreach programs across early childhood, primary and secondary education, including with local governments and use of role models b. improving the availability of accurate, appropriate and timely careers advice and improving familiarity with higher education” (page 69).*

Whilst Australia has had dedicated Widening Participation programs since 2011, there are some areas, particularly in regional, rural and remote Australia that receive limited to no access to Widening Participation activities, often due to the cost of reaching students in remote areas. However, some schools in metropolitan areas are being over-served by universities. In addition to this, by placing Widening Participation solely within the remit of universities, there continues to be competition amongst the sector with an increasing number of Widening Participation teams being moved into marketing and recruitment areas. Every lifelong learner should have access to effective pathways and career advice and experiential opportunities that support their decision making and likelihood to pursue a higher education pathway.

Recommendation 3: National and Place Based Approaches to Widening Participation

EPHEA proposes a two-tiered approach to Widening Participation:

- (1) Nationally Coordinated Approach to Widening Participation that:
 - a. Establishes a clearly defined and interconnected strategy for Widening Participation across all education sectors nationally that addresses the achievement gap from pre-school, school and post-education and training;
 - b. Enables national tracking and monitoring, through a national database, to understand and enhance the collective impact of Widening Participation across Australia;
 - c. Increases efficiencies in the delivery of Widening Participation activities, through coordinated national curriculum and resource design;
 - d. Supports state-based collaborations to enable every learner in every state to have access to widening access programs and activities, and effective pathways and career advice across the lifespan.
- (2) Place-Based Approaches to Widening Participation that:
 - a. Are supported by a nationally coordinated and comprehensive approach;
 - b. Ensures that Widening Participation teams are not simply extensions of marketing and recruitment teams in higher education institutions, but instead focus on capacity building to enable students to pursue their desired post-school pathway.
 - c. Brings together multiple partners (including schools, vocational education providers, universities, regional university centres, industry and community organisations) to have a collective responsibility for the post-school destinations for individuals in their region;
 - d. Prioritises non-school leaver engagement to meet the Accord’s national targets.

EPHEA recommends that specific funding for Widening Participation be allocated to providers (separate from funding for student support) to ensure spending on Widening Participation is transparent and accounted for, and to encourage collective responsibility across higher education providers to promote collaboration and cohesion as opposed to competition and marketisation.

(3) Establishing priority learner groups.

Accord Interim Report Recommendation: *“specific higher education participation targets for students from underrepresented backgrounds and equity groups to achieve parity by 2035. These groups will include students from **low socio-economic, regional, rural and remote backgrounds and students with disability**” (page 43).*

There is recognition in the Australian Higher Education sector of the complex nature of educational disadvantage and the need to shift the focus from separate, discrete equity groups, to acknowledging that individual students can experience multiple facets of disadvantage (Tomaszewski et al., 2020). Students who aspire to and attend Australian Higher Education institutions form a diverse student population. However, the Accord Panel’s recommendation to only focus on four equity groups may not achieve the intended expansion of the higher education system. Whilst we are pleased to see the inclusion of students with disability, it does not acknowledge the complexity of barriers faced by the diverse student population in both accessing and succeeding in higher education. The exclusion of other important equity groups in higher education policy (such as those outlined below) may lead to skewed institutional decision-making and program design, resulting in a misallocation of funding and resources. This approach risks hindering the achievement of the Accord Panel’s ambitious target of reaching population parity, across all equity groups, by 2035; a goal strongly supported by EPHEA.

Since the 2008 Bradley Review, whilst the sector has delivered a suite of impactful programs and initiatives to support increased access and participation, little progress has been made in addressing systemic barriers to higher education. Rather than focusing on four equity groups, EPHEA advocates for a shift in narrative, and an understanding that it is our education ecosystem that presents barriers to higher education. We should start to shift our focus to developing a higher education system that is accessible and inclusive and apply Universal Design for Learning principles and inclusive learning frameworks to help us identify and address these barriers, including the essential resourcing for accessible digital products.

Recommendation 4: Priority Learners

EPHEA proposes to discontinue the current terminology and definitions around equity groups.

Instead, EPHEA recommends introducing a framework centred on **'Priority Learners'** (similar to the [Ako Aoetearoa National Centre for Tertiary Teaching Excellence](#)). 'Priority Learners' are identified based on their importance to achieving the Accord Panel's objective of 55% higher education attainment, to grow the sector by an additional 300,000 Commonwealth supported students in 2035 and an additional 900,000 Commonwealth supported students in 2050.

Outlined below are recommended student groups to be considered within the 'Priority Learner' cohort to be further developed in a way that acknowledges the strong cumulative disadvantage that occurs across the intersectionality of these groups. This cohort is monitored and reviewed annually (at a national level), with new 'Priority Learner' groups identified and included as necessary over time. Initially, priority learners would include:

- Aboriginal and Torres Strait Islander students
- Students from low-income families and those experiencing financial hardship
- Students from regional and rural areas
- Students from remote areas
- Students with disability, including medical conditions
- No parental experience of higher education (i.e., first in family)
- Students who are racially and culturally minoritised
- Students who are linguistically diverse
- Care experienced students
- Students with caring responsibilities
- Students who are part of LGBTIQ+ communities
- Students transitioning to higher education from vocational courses
- Students from refugee backgrounds and asylum seekers
- Students from Pasifika communities
- Students from schools with an ICSEA rating below the state average
- Women in non-traditional areas

To provide a more nuanced understanding of the barriers to access, participation and completion experienced by Priority Learners, EPHEA suggests the establishment of an **'Opportunity Register'** (similar to the Risk Register developed by the [UK Office for Students](#)) to better understand the impact of cumulative disadvantage and the range of risks to equality of opportunity.


The long-term aspiration for the sector should be focused on inclusion and accessibility for everyone, eliminating systemic inequities and the singling out of individual student groups.

Recommendations for the development of the Final Report

EPHEA received feedback from our members on the need to enhance the voice of students and communities in the Accord Process and can support such opportunities should the panel wish to further engage with those we serve.

Thank you for your time and ongoing work. Please contact me if you have questions or wish to discuss any of the points made within our submission.

Kind Regards,


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