

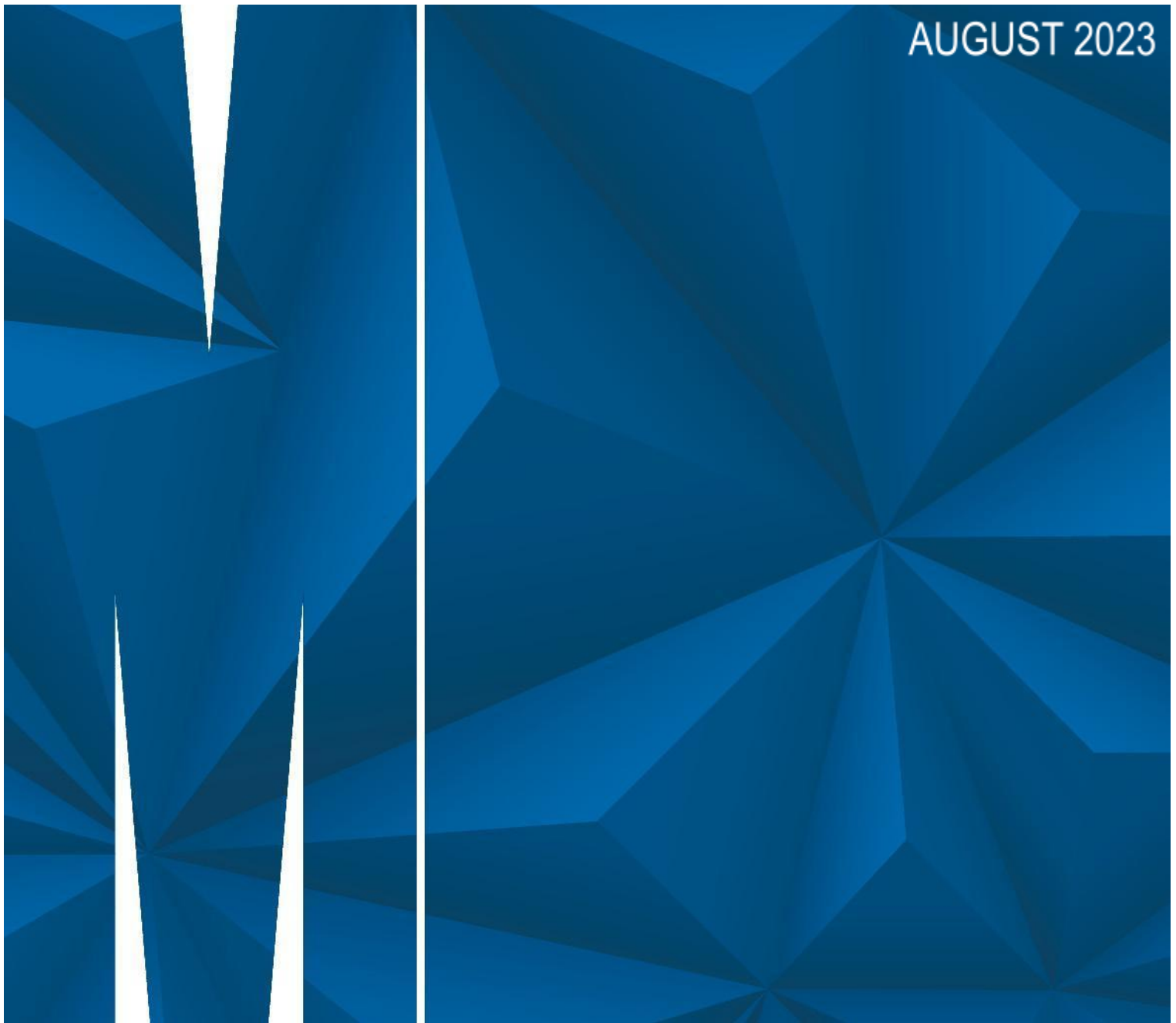


MONASH  
University

Office of the  
President and  
Vice-Chancellor

# RESPONSE TO INTERIM REPORT AUSTRALIAN UNIVERSITIES ACCORD

AUGUST 2023



## **ACKNOWLEDGEMENT OF COUNTRY**

Monash University recognises that its Australian campuses are located on the unceded lands of the people of the Kulin Nations, and pays it respects to their Elders, past and present.

## INTRODUCTION

Monash University's character and purpose is based upon its establishment in 1958 in the south-east growth corridor of Melbourne, at a time of postwar nation building. Part of the second wave of national institutions, the University opened to serve a new community with a focus firmly on public service "as required by the necessities of the age". Monash's success in achieving this mission is based firmly upon understanding the needs of its community, seizing opportunities to improve its offer for its communities and identifying early the benefits of internationalisation. This has inspired its contemporary focus on the challenges of the age across its global network of campuses - responding to climate change, preserving geopolitical security and fostering thriving communities.

Monash is therefore in strong agreement with the Accord Panel's understanding of higher education's mission to "Make a better future possible for Australia" and the first finding that "a high-quality and equitable higher education system is essential for Australia." (p9) Monash plays an important role in undertaking the research and developing enduring industry partnerships to achieve a better future while also providing quality educational experiences for all students, including those from underrepresented groups.

Universities share a common purpose in the creation and dissemination of knowledge and contribute to Australian priorities and global challenges in accordance with their different missions and strengths. The enduring, common purpose must be supported to ensure a thriving sector that is able to support other important government priorities.

Our submission focuses on the proposals that should be the highest priorities for government and notes some situations where the policy proposals may not achieve the stated goals.

We are happy to provide greater detail on any aspect of our submission or respond to proposals not addressed at the request of the Panel.

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## EXECUTIVE SUMMARY

### SYSTEM AND GOVERNANCE

#### WHOLE OF GOVERNMENT COORDINATION

The many proposals contained in the Accord interim report reflect the broad terms of reference and are not exclusive to universities. They relate to all aspects of post-secondary education (encompassing vocational, technical, workforce training, upskilling, reskilling, cross skilling and specialist non-university higher education) and to the public funding of research conducted largely in public universities.

Responsibility and stake holding ranges across the Commonwealth Departments of Education, and Employment and Workplace Relations, and State/Territory departments for education and training (as well as DISR, Health, Defence, and Agriculture which are significant Commonwealth funders of research, and Treasury which jointly administers the R&DTI).

Given the long-term ambitions of the Accord, we recommend that the priority be to achieve multi-partisan agreement across the Commonwealth, State and Territory governments on the key matters of common interest and oversight. This should include the establishment of an independent Tertiary Education Commission to support tertiary education across jurisdictions, with membership/leadership drawn from across governments, regulators and the sector.

Once established, we support the TEC's responsibilities to advise the Minister(s) and

- support the capability of the sector with strategic development planning and distribution of funding
- refine and implement those recommendations of the Accord review that are high priority and the responsibility of government agencies, particularly
  - securing First Nations self determination
  - implementing the Noonan review of AQF
  - changes to Provider Category standards to facilitate institutional diversity
- working with the sector and stakeholders to pursue Accord proposals in areas that are the responsibility of the institutions, or which have multiple stakeholders.

#### A SELF-DETERMINED SYSTEMS APPROACH TO FIRST NATIONS PARTICIPATION AND SUCCESS

We support the proposal for a review of First Nations people, research, teaching, governance and leadership in higher education. We support the appointment of an Indigenous Higher Education Commissioner, as a first step in achieving meaningful self-determination. An Indigenous HE Commissioner should be a member of any statutory bodies for tertiary education, including TEQSA, and a TEC.

We support uncapped places for Indigenous students but in our experience, targets and places are not the barriers to participation.

At Monash the Indigenous-led William Cooper Institute manages [Indigenous access and support programs](#), including tutoring and a range of cultural and social supports. Indigenous students receive an annual \$5,000 bursary for study.

#### STUDENT AND STAFF SAFETY

Monash strongly agrees that a greater national effort is required to address safety concerns. Our approach to the prevention of and response to sexual harm and gender-based violence on campus is ongoing with a focus on strong governance, primary prevention and effective disclosure, reporting and response measures through the [Respectful Communities](#) and [Safer Community](#) teams. It is based on ongoing consultation with students, victim survivors and experts and includes compulsory consent education modules for students, training for residential advisors and other student leaders, independent on-campus counselling, transparent annual reporting and best practice disclosure, reporting and misconduct processes.

We acknowledge the working group that has been established to address priorities of governance within which student safety has been included and look forward to engaging with it.

We recommend the existing TEQSA framework be used to Accord Priority 5 safety concerns. Utilising the existing TEQSA framework, and associated functions, is an efficient and risk-based means of improving university governance concerning student and staff safety.

We recommend the establishment within TEQSA of a Higher Education Prevention of Sexual Harm unit, alongside amendments to the Higher Education Standards Framework to require specific activities targeting sexual assault and sexual harassment matters. Providers are already aware of TEQSA's remit and operating model, including the power to place conditions upon or cancel the registration of providers who do not meet the requirements of the Threshold Standards. The new unit could also work with the Higher Education Standards Panel to explore regulation of privately-owned residential colleges.

Refer to Appendix A for more detail about proposed TEQSA regulation of the higher education approach to sexual harm.

## STUDENT VOICE

As noted by the Accord panel, students can find institutional policies, procedures and systems complex and unclear (p136). We have been simplifying our communications to what is necessary and helpful for students, rather than reproducing the complete policies (including our [student charter](#)). Monash has a University Student Ombudsman who reports directly to Monash Council. Complaints that are not satisfied by the Ombudsman are referred to the State Ombudsman. It is not our experience that response times are slow.

Refer to Appendix B for information about complaints handling at Monash.

[We do not recommend the additional layer of a Commonwealth Ombudsman for higher education, because appeals relating to state-registered public education institutions can be lodged with the relevant State/Territory Ombudsmen.](#)

## FUNDING FOR WORLD CLASS UNIVERSITIES

The Commonwealth Government is rightly ambitious to develop a stronger, diversified and more secure economy in which all Australians have the opportunity for a better quality of life.

We agree with the need for equity and excellence in education and research, and support Commonwealth policy and funding that reflects this national ambition. Over the last three decades, Commonwealth funding for universities has fallen from 0.9 percent of GDP in 1995 to 0.6 percent of GDP in 2021, while enrolments have increased. Data presented in an Australia Institute | Centre for Work report into attitudes towards higher education show that from 2013-23 real funding for higher education declined by 2.4 percent while domestic enrolments increased by about 18 percent<sup>1</sup>.

In a context where government funding for both research and education does not cover the full cost, Monash uses revenue sourced from its own account activities to make up the shortfall and: subsidise domestic undergraduate education where CSP+student contribution does not meet the cost of delivery in a range of disciplines; provide equity scholarships to domestic and international students and programs to ensure all students get the support they need to successfully complete their studies; and provide essential teaching and research infrastructure.

[Monash does not support the collection of levies from the sector to fund/redistribute income across the sector.](#)

[We have strong reservations about the imposition of an international fee levy. It is likely to result in a net loss of revenue from Victoria and New South Wales, lead to job losses from the institutions that are taxed, and continue the sector's reliance on international fee income.](#)

[Australia competes in a competitive global market as a destination for the best international students. The reputational and price impact of an international student tax is likely to result in the contraction of the Australian share of international demand, particularly in non-China markets. It could jeopardise our position as one of the world's most successful multicultural nations, and conflict with other long term priorities of the Commonwealth for international relations, regional security, migration and population stability to meet workforce and society needs.](#)

The levy runs counter to the Accord's position on fostering international engagement, which says: "The Review sees international education less as an industry and more as a crucial element of Australia's soft diplomacy, regional prosperity and development" and particularly to the first two policy priorities: "(a) ensuring that international education supports broader Australian foreign policy objectives, for example, strengthening relationships with India and the Pacific and (b) making international education more embedded within the mission of the Australian tertiary education system and to the mission and purpose of individual institutions." (p18)

A general levy on universities is also a cause for concern. We understand that the government is seeking to reform Australia for future prosperity and that there are limits to what can be achieved within budgetary capabilities. However, taxing not-for-profit education and research institutions in order to fund them may not be an efficient allocative mechanism. Institutions should be encouraged to develop new areas of activity appropriate to their own missions and communities, and given flexibility to play to their own strengths through revised Provider Category Standards. In that regard it runs counter to goals for greater diversity across universities.

[As a priority, we support the Accord's commissioning of experts to find a stable funding model based on the true costs and benefits of education and research, and the determinants of costs. As well as geographic location and student characteristics, we note that delivery costs can vary according to the institution and teaching model used, class sizes, pedagogy and learning infrastructure.](#)

[Once reliable estimates are obtained of the core education and research activities of public universities, there must be a commitment to fund them appropriately, or a recognition that elements of the Accord's ambitions for equity, excellence, international engagement, innovation and a high functioning national system may not be achievable.](#)

## RESEARCH

The basic research and research training that is overwhelmingly undertaken in Australian public universities is an investment in sustainable futures and quality of life - in opportunities and in the solutions to society's problems, today and tomorrow. Basic research is the public good that drives real world innovations and informs future workforce and industrial

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<sup>1</sup> Refer Public Attitudes on Issues in Higher Education, Eliza Littleton, Centre for Future Work, July 2023, <https://futurework.org.au/wp-content/uploads/sites/2/2023/07/Public-attitudes-on-education-FINAL.pdf> p4

development. We agree that an excellent research system requires that “a predictable pathway forward for higher education policy and funding be found and a consensus be built around it to give it adequate time to be implemented.”

We recommend a review of public research in Australia, ideally with the development of a national strategy for the funding of research that acknowledges all the current Commonwealth expenditure across government.

We acknowledge the costs involved and accept that public funding alone cannot satisfy the ambitions. We support accounting for the indirect costs of research in Commonwealth awarded grants, through the allocation of 50 cents for every dollar funded.

Research infrastructure attracts global research talent, builds local talent and enables the research itself. Establishing NCRIS as a foundation of the research system is key to securing the future of sovereign research capability.

We recommend priority be given to the Accord proposal for the continuation of NCRIS as an enduring source of funding of Commonwealth research infrastructure, as part of a lifecycle approach strategy for infrastructure investment.

We support measures to incentivise industry-university partnerships, such as a premium to the R&DTI for entities that engage with universities in their R&D and the introduction of matched third-stream funding to encourage early proof-of-concept and prototyping.

## EQUITY IN EDUCATION

We agree with the Report’s characterisation of the sector as excellent with “talent and commitment from staff, students and university leaders”. We also believe that excellence cannot be achieved without equity. The equity data presented in the Interim Report underplayed the scale of the contribution of large universities such as Monash.

Monash works very hard to assist and admit suitably prepared students via various access programs and scholarships and to support them to achieve their goals. In 2023, 24,700 students (more than half of the Monash cohort) reported at least one form of disadvantage. Compared with other similar institutions, Monash has a large number of low-SES students. Between 2018 and 2022, 30,576 Monash students have received one or more scholarships and there are a range of specific supports to ensure they are able to thrive. This effort results in high retention and success rates above the national average.

### Monash participation, retention and success rates

Equity category	Monash participation by year, no.						Retention 2021, %		Success 2021, %	
	2018	2019	2020	2021	2022	2023	Monash	National	Monash	National
Indigenous	234	256	293	354	330	365	81.8	74.2	80.9	74.3
Low-SES	4590	4650	4529	4980	4704	4718	90.3	79.5	91.2	82.5
Disability	3536	3916	4073	4673	4907	5129	89.4	79.8	89.6	82.5

Source: <https://www.education.gov.au/higher-education-statistics/resources/2021-section-11-equity-groups>

Refer to Appendix C for Monash’s approach to Access, inclusion and success.

We support a “student-centred, needs-based funding model” (p147) and a universal learning entitlement so that “any capable student would receive a CSP in a higher education course of their choosing.” (p156) However, we are concerned that the potential proposal for a “discipline mix that meets Australia’s skills needs both nationally, regionally and locally” (p156) could become overly prescriptive and is not compatible with the student-centred approach. It may have the consequence of undermining the central intention of universal access to learning and further entrenching existing advantage and disadvantage, widening the gap between.

## APPENDICES

### APPENDIX A | SEXUAL HARM REGULATORY AMENDMENTS FOR THE HIGHER EDUCATION SECTOR

#### Background

The Australian Universities Accord Interim Report notes that

“higher education institutions need to be better and safer places to work, consistently and reliably meeting workplace obligations. The Review acknowledges that great progress towards this has been made by many institutions, but that more obviously needs to be done. Staff and student safety, including in relation to sexual assault and sexual harassment, requires concerted action.”(p21)

A working group has been established to advise the government on ways to strengthen university governance in relation to sexual harm prevention and response. It has been proposed that a new independent regulatory body be created to oversee universities’ prevention of sexual harm.

#### Proposed Response

We recommend that TEQSA oversees the efforts to improve safety in relation to safety. Utilising the existing TEQSA regulatory framework, and associated functions, is an efficient and risk-based means of improving university governance concerning student and staff safety.

- The *TEQSA Act* and *Higher Education Standards Framework* are existing legislative instruments that are in place and understood by all provider categories; implementation of legislative changes through these documents will be more straightforward, and faster to implement, particularly for such a pressing sector issue. TEQSA also has the power to place conditions on/cancel the registration of providers who do not meet the requirements of the Threshold Standards.
- This would allow for a full higher education sector mechanism for regulation - all existing and prospective providers are aware of its remit and operating model. This will ensure all provider categories are included in scope of the changes necessary to address risk identified in the Accord interim report, and recent [media reporting](#).
- The alternative of establishing a new regulatory body for sexual harm would be a lengthy process involving the drafting of legislative instruments, finalising staff capability, etc. It would:
  - create additional regulatory burden
  - be confusing to students and providers
  - duplicate existing legislative pathways
  - not address additional 'student wellbeing' concerns such as general wellbeing and safety standards, foreign interference-related wellbeing concerns and mental health considerations.

To implement this approach of TEQSA regulation, legislative change and operational changes are recommended.

#### Legislative changes

1. Amend the *Higher Education Standards Framework* to expand the existing Standards (for example [Standard 2.3 Wellbeing and Safety](#) and [6.2 Corporate Monitoring & Accountability](#)) to require specific activities targeting sexual assault and sexual harassment matters including:
  - a. governance and public reporting (e.g. reporting sexual harm, including disclosures and actions taken)
  - b. prevention (including primary prevention initiatives)
  - c. response (e.g. in relation to disclosures of sexual harm)
  - d. third party obligations (e.g. requirements of affiliated colleges to ensure sexual harm disclosures and reports are overseen by the University, and consideration of extending remit to commercial residential settings of more than x students)
2. Amendments to the Threshold Standards may include specific provisions for the different categories of provider type - e.g. requirements on universities are different to those of smaller institutes of higher education.
3. Require that the Higher Education Standards Panel (HESP) work with the sector and industry experts and key student bodies, including End Rape On Campus Australia and the National Union of Students, on amendments to the Threshold Standards.

The HESP may also consider ways to draw in requirements for homestay accommodation requirements for students under 18 years of age, such as those existing under [Standards 5 of the National Code](#)

#### Operational changes

1. Introduce a Higher Education Prevention of Sexual Harm Unit within TEQSA. This Unit would mirror the operational and funding model of the existing Higher Education Integrity Unit (HEIU), with a dedicated funding envelope (outside TEQSA regulatory operations) and a director reporting to the TEQSA CEO.



2. The director of the new unit would work with government, the sector and student groups to facilitate engagement on its functions including with students. Critical to those functions is the engagement with experts from within and beyond the sector, along with close engagement with student groups, to ensure an ongoing, best practice approach to the prevention of sexual harm.
3. This new unit would provide training and educational resources for the sector, developed in partnership with academic experts as well students. Priorities could include:
  - a. administration of sector-wide survey to ensure ongoing monitoring of students' experiences of sexual harm, while also measuring the impact of universities' sexual harm prevention activities across both student and staff groups<sup>2</sup>
  - b. providing guidance and setting expectations on standard requirements for the publication of annual reports
  - c. updating the [Guidance note: Wellbeing and Safety](#) to provide specific requirements for higher education providers, such as training for senior staff, implementation of policy/procedure, and the development of action plans to support implementation.
4. The unit could work with the HESP to further explore privately-owned residential colleges and ways to ensure regulation, amendments to ESOS Act that would better support under 18 students, and other priorities as directed by the Department and/or TEQSA.

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<sup>2</sup> Note: this removes UA survey and ensures it will be completed within budget arrangements for the new Unit



## APPENDIX B | COMPLAINTS HANDLING AT MONASH

To support timely and effective resolution of complaints, Monash takes a tiered approach to complaints handling, with its [Student Complaints Policy](#) outlining a complaints framework of five stages:

1. Informal, direct complaint raised directly with the staff member or area responsible for the decision or service related to the complaint.
2. Informal, escalated complaint raised with a staff member within the faculty, school, department or other area who has the ability to review a stage 1 decision.
3. Formal investigation by nominated case officers and complaints officers who have not had previous involvement with the complaint.
4. Internal review conducted by the University Student Ombudsman.
5. External review by the Victorian Ombudsman.

Students are advised to contact the University Student Ombudsman (USO) within 20 days of receipt of an outcome of their stage 3 complaint, should they wish to request an independent review of the decision.

Of the 45 reviews by the University Student Ombudsman in 2022 into the merits of the stage 3 decisions:

- in 35 matters, the USO decided that the original decision was satisfactory, and dismissed the complaint
- in 10 matters, the USO reconsidered the complaint or took further action, with the student accepting the solution that was offered. Of these, 8 matters related to decisions made by other areas, and 2 matters related to decisions made by Student Conduct and Complaints.

## APPENDIX C | ACCESS, INCLUSION AND SUCCESS AT MONASH

Monash's Access, Inclusion and Success team improves the participation of students from low-SES and regional and remote communities in tertiary education and supports them to achieve their learning goals.

The **Schools Access Monash** program delivers in-school and on-campus activities to 51 partner schools in low-SES and regional areas, reaching about 13,000 students. The **Access Monash Mentoring** program included 360 mentors and 550 mentees.

**Student Academic Success** provides academic skills, language and learning support for students across all locations and tracks at-risk students accessing our services to support faculty interventions. Services include one-on-one consultations, workshops, diagnostic testing and intervention and outreach to at-risk students.

At Monash, programs for commencing students are offered to increase their sense of belonging and academic achievement through Peer mentoring, Alumni to Student mentoring and Peer Assisted Study Sessions.

- The **Peer Mentoring program** provides commencing students with a peer-led support network in their faculty. Data show a 14 percent increase in mentee attendance at Peer Mentoring catch-ups from Semester 1, 2022 to Semester 2, 2022 following activation of an opt-in approach. This has continued to increase to 18.5 percent from Semester 1, 2022 to Semester 1, 2023.
- The **Alumni to Student Mentoring** program launched a flash mentoring pilot following the structured four-month program in mid-August. Flash mentoring operated for 6 weeks and was an opportunity for a mentor and mentee to have a short conversation to address a specific question or goal the mentee may have.
- **Peer Assisted Study Sessions (PASS)** provide in-unit, peer-based support for students to maximise their academic success delivered by students who have previously completed the unit successfully and who have undertaken PASS leader training. PASS is highly rated by participants completing the end-of-program survey - 91 percent expressed a strong likelihood of recommending PASS to their friends, 67 percent agreed that PASS helped them understand the unit content, and 69 percent indicated that PASS has been useful in helping them reach their academic goal in the unit. PASS has been shown to have a significant impact on students' academic performance - accounting for differences between PASS participants and non-participants, students who attended five or more sessions were shown to achieve a final unit mark 5 points higher, on average, than non-participants.

**Project Elevate** supports the programmatic uplift of units and courses that have significant numbers of international students. Learning designers work with faculties to build their capacity to review and align learning outcomes, build authentic assessment, plan weekly sessions and build asynchronous online learning resources. Student satisfaction with staff teaching an Elevate unit in 2022-2023 rose by 5 percent from 79.5 percent to 83.4 percent.

Monash offers on-campus regional students extra support such as the **regional lounge** during the first two weeks of semester 1 2023. More than 500 Monash students from regional or remote locations dropped in to connect with each other and speak with our Access, Inclusion and Success staff, student leaders, and academic staff from regional Australia. They were given a goodie bag with essentials for life in Melbourne and they left some great feedback for us on their experience and expectations.

The **Extended Rural Cohort** program within Medicine enables students to undertake placements at Monash Rural Health Sites. Medical Student Kyra completed placements in Bendigo, Mildura and Gisborne that have shaped her career goals. Through the Monash North West Victoria Regional Training Hub, Kyra took part in a range of career development opportunities and attended the Royal Australian College of General Practitioners annual conference, gaining new insights into the diverse settings a career in general practice could offer. Monash also connected Kyra to local support to apply for an internship close to her family in Ballarat. She will join the Grampians Victorian Rural Generalist Program internship pathway in 2024. "I am intending to become either a GP or a Rural Generalist. If I were to pursue RG, I would consider Advanced Specialised Training in paediatrics, obstetrics or anaesthetics, depending both on how my interests evolve and what the needs of the community I hope to work in are. In any case, I definitely see myself working in a regional or rural setting."