

Australian Universities
Accord (Interim Report)

ENQUIRIES

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INTRODUCTION

La Trobe University welcomes the opportunity to respond to this Interim Report. La Trobe supports the Interim report's five Priority Actions and looks forward to their swift implementation. In line with the Panel's request, this submission is structured as follows:

- A. La Trobe's Key Priorities/Positions on the Interim Report Proposals.
- B. Three Reflections on the Interim Report
- C. Areas of Agreement with the Interim Report
- D. Areas of Disagreement with the Interim Report

Attachment 1: La Trobe's view on each of the report's policy ideas

La Trobe's Key Priorities/Positions on the Interim Report Proposals:

La Trobe supports:

- Targets for tertiary education participation and attainment, including for higher education, through consultation with Jobs and Skills Australia (JSA) and the VET sector
- Specific higher education participation targets for students from underrepresented backgrounds and equity groups to achieve parity by 2035, provided further modelling is commissioned to ensure these targets are achievable
- The establishment of a Tertiary Education Commission which should, as a priority, devise an overarching plan for higher education in Australia
- A funding model/approach that addresses the specific challenges and costs of higher education delivery in regional Australia
- Alignment and collaboration between the higher education and vocational education sectors
- Putting First Nations at the heart of Australia's higher education system

In addition to the above, the Australian Universities Accord (the Accord) should:

- Set specific targets for the required government investment in Research and Development (including basic research)
- Provide more clarity on the nature of the projected growth in higher education participation and attainment, including on the type of institutions that will deliver this growth while making sure that no two-tier system of institutions is created
- Provide specific recommendations on identifying disadvantage and the reasons for lower participation and attainment among equity cohorts at an earlier stage (than school-leaving age), with alternate pathways (beyond ATAR) supported by government
- Strengthen the provisions relating to "reducing the cost of living barriers to higher education through improved income support measures and more opportunities for part-time study"

A. THREE BIGGEST REFLECTIONS ON THE INTERIM REPORT

Reflection 1: The Accord must set targets for the Australian Government's investment in Research and Development expenditure (including basic research) to be in the OECD's top quartile by 2050

In the same way that the Interim Report recommends setting headline targets for overall higher education attainment and for participation from equity cohorts, headline targets should be set for investment in Research and Development. Overall, the Accord should strengthen the case for adequate research funding and why it is important not just for the sector but for the country. La Trobe supports the proposal to move over time to "ensure the National Competitive Grants cover the full cost of undertaking research" provided that the overall quantum of funding for research increases significantly. Otherwise, this would mean even further concentration of research and lower success rates overall. La Trobe supports the intent to encourage "government to become an exemplar user of university research". Accordingly, it is essential that with regard to Category 2 research

(Other Public Sector/R&D income), governments themselves (local, state and federal) move towards covering the full cost of undertaking the research they commission. As a first step, we recommend a target of funding the indirect cost of research (across whole-of-government) at 50 cents to the dollar with a move towards funding the full cost of research as the longer-term goal.

Reflection 2: The Accord must provide more clarity on the nature of the projected growth in higher education participation and attainment and on the type of institutions that will deliver this growth while making sure that no two-tier system is created.

An expansion on the scale envisaged in the Interim Report will require many changes to the current system. As it stands, the university sector simply does not have the capacity to accommodate this growth. Much of this expansion will probably have to take place in institutions which currently do not exist, or else more higher education provision must take place outside the university such as in TAFEs and/or NUHEPs. A key challenge for the Accord is to identify what these institutions will be and how their quality will be assured. There is no doubt that this will require an overarching plan for higher education that Australia currently lacks, and which should be an immediate priority of the proposed Tertiary Education Commission.

Should new and/or additional institutions be established to absorb this growth, a key challenge will be to ensure that the new institutions are adequately placed to cater for equity cohorts (from which the majority of increased participation is expected). Keeping in mind the intent of the Dawkins reforms, another key challenge will be to ensure that in the drive to create additional institutions, we do not create a two-tier system.

Reflection 3: The Accord should make stronger recommendations on whole-of-government approaches to overcoming existing financial barriers to higher education

La Trobe supports the Interim Report's proposal "to reduce the cost-of-living barriers to higher education through improved income support measures and more opportunities for part-time study". La Trobe's experience in working with equity cohorts (especially regional, rural and remote students) has demonstrated that the reasons for the lack of participation or lower levels of attainment may have nothing to do with a lack of aspiration or lack of support from their higher education institution. Often, the reasons are financial. Students are simply unable to dedicate themselves to study because they cannot afford living costs without full-time work. We believe that this issue can be addressed via a whole-of-government approach and via policy levers outside the education system such as improved Centrelink support, lowering the age of independence and improved childcare settings. (See Section D.g. in Attachment 1 for more details).

B. AREAS OF SUBSTANTIVE AGREEMENT

Specific higher education participation targets for students from underrepresented backgrounds and equity groups to achieve parity by 2035: La Trobe welcomes the Interim Report's focus on lifting participation from equity groups though further modelling should be commissioned to ensure these targets are achievable. It is also clear that a significant injection of funding will be required to enable these ambitious targets to be reached. On the basis of our experience of working with equity cohorts, we submit that it is important to keep in mind the cumulative disadvantage of membership of multiple equity groupings. It is also essential to identify disadvantage and the reasons for lower participation and attainment among equity groups at earlier stages than university, namely in the early learning and school settings. The ongoing parallel reviews in the schools and early childhood systems are a unique opportunity to connect the dots across the nation's education system. Accordingly, we strongly welcome the Report's proposals to "increase access to preparatory and enabling programs to provide more pathways into higher education, "to improve career advice" and to "align and improve outreach programs across early childhood, primary and secondary education" Our experience has been that these alternate pathways, such as La Trobe's Shepparton and Albury-Wodonga pathways work well, with program participants over four times more likely to attend tertiary education than the average participation rate in each catchment. However, these pathways are currently reliant on funding from philanthropy and we therefore strongly recommend government support for pathway programs.

Putting First Nations at the heart of Australia's higher education system: La Trobe strongly welcomes this statement provided that all relevant policy proposals (including a First Nations Higher Education Council, self-determination approaches to funding and policy settings and the development of partnerships with higher education, research, and industry partners) are approached from an Indigenous standpoint i.e. In building a

nation of reconciliation and equality, First Nations must be the designers of any functional or policy development principles. Moreover, when developing some of the Accord's proposed ideas, such as the Tertiary Education Commission, First Nations should be positioned 'at the heart' of these developments to enable the representation of Indigenous understandings from within.

Alignment and collaboration between the higher education and VET sectors: As a university with very strong partnerships with TAFE counterparts, La Trobe has long called for greater alignment between the two sectors. We would also welcome the remit of the proposed Tertiary Education Commission over time to include a pursuit of "greater opportunities for alignment and collaboration between the higher education and VET sectors". Some of the current barriers to the alignment of the two sectors include the failure to rehaul the Australian Qualifications Framework (though we would recommend a lighter version than the one proposed by the Noonan review); a lack of data on students transitioning between the two sectors (especially from higher education to vocational education) and the cumbersome way in which TAFE qualifications are updated.

Tertiary Education Commission (TEC): La Trobe supports the proposal for a TEC, charged with overseeing the development of a fit-for-purpose tertiary system and operating with a degree of independence from Government. As outlined in Reflection 2, a key priority for the TEC should be the formulation of an overarching plan for higher education in Australia, which will outline in detail how the targets and the priorities of the Accord will be achieved, including the mix of higher education providers which are needed to deliver the planned growth in the system. In the last decade, the sector has been subject to successive policy changes, at times aimed at genuine reform but more often aimed at containing expenditure. A strong TEC would provide much needed stability for providers, students and industry. In turn, the sector would be in a better position to innovate to address national priorities whether they are areas of skills shortages or research priorities. La Trobe supports the Accord's proposal for the TEC to work closely with the regulator (TEQSA) to enable "innovation in the tertiary education system". Functioning as a 'Guardian of the Accord', and working as a conduit between the Government, the sector and the Department of Education, we believe that a TEC has the potential to provide much-needed stability and structure to Australia's tertiary education landscape.

A funding model/approach that addresses the specific challenges and costs of higher education delivery in regional Australia: As a university with a strong footprint in regional Victoria, La Trobe knows all too well the challenges of regionally-delivered higher education, characterised by thin markets, higher costs of regional delivery and a majority of students studying part-time which tends to co-relate with a stronger need for student support. Despite several reviews and attempts at reform, the current policy funding settings are not working well for regionally-based universities. In addition to the higher cost of delivery, it is harder to achieve economies of scale in general operations and harder to attract international students (though preferential Post-Study Working Rights has been welcome as well as Destination Australia scholarships). A related challenge, linked to the Accord's overarching aim of lifting participation from equity cohorts, is how to raise aspiration in regional, rural and remote Australia. We therefore welcome the Interim Report's focus on regional delivery. The Accord should look at a suite of approaches to address the challenges of regional higher education, including the pros and cons of a national regional university as well as innovative methods of delivery (such as short courses and stackable micro-credentials) that would better suit the continuum of learning preferred by rural and regional cohorts.

C. AREAS OF SUBSTANTIVE DISAGREEMENT

Levy on international student fee income: La Trobe strongly opposes the Interim Report's proposal to introduce a levy on international student income as a funding mechanism to provide insurance against "future, economic, policy or other shocks" or to fund national and sector priorities such as infrastructure and research. In the first instance, the treatment of international students as merely a source of revenue contrasts with the Accord's other priority for international education "to support broader Australian foreign policy objectives". Secondly, what the sector needs, particularly if it is to meet the expectation of performance relative to OECD counterparts, is additional investment, not a shuffling of existing funds. It is worth noting that universities already pay levies linked to the recruitment of international students, namely the CRICOS Annual Registration Charge and the Tuition Protection Service Levy.

ATTACHMENT 1: LA TROBE RESPONSE TO INTERIM REPORT’S ‘AREAS FOR FURTHER CONSIDERATION’

Interim Report: Areas for Further Consideration	La Trobe response/comments
Evolving the mission of Higher Education	
A. Putting First Nations at the heart of Australia’s higher education system	
<p>First Nations students, culture, knowledge, research and communities should be at the heart of the Australian system of higher education.</p> <ul style="list-style-type: none"> a. Creating a new First Nations Higher Education Council to give voice to the needs, aspirations and know-how of community b. Moving towards a self-determined approach to national funding and policy settings in relation to First Nations students, employment, teaching, research and engagement, with universities mirroring this approach within their institutions, as is the case in some institutions today c. Supporting a First Nations-led review of access, participation and outcomes for First Nations students and staff, research, teaching, use of First Nations knowledges, and First Nations governance and leadership within universities d. Enhancing research capability for First Nations knowledges and for collaboration and partnerships between First Nations communities, governments, universities and industry. 	<p>“Putting First Nations at the heart of Australia’s higher education system” should be at the heart of all decisions and directions in this review, provided that they are directed and positioned from an Indigenous standpoint i.e. In building a nation of reconciliation and equality, Indigenous peoples must be the designers of any functional or policy development principles. This includes ideas such as creating a First Nations Higher Education council, self-determination approaches to funding and policy settings and the development of partnerships with higher education, research, and industry partners. Moreover, when developing some of the Accord’s proposed ideas, such as the Tertiary Education Commission or the National Student Charter, Indigenous communities should be positioned ‘at the heart’ of these developments and not as an associated body or separate focus but as principal positions within them to support the representation of Indigenous understandings from within. This would present some level of Indigenous self-determination from an Indigenous position not as a value designed for Indigenous peoples by non-Indigenous representatives.</p> <p>The engagement of Indigenous understandings has been a priority within higher education for some time and this can be noted in policy such as Universities Australia’s Indigenous strategic plans and many various university Indigenous Strategic policies or reconciliation action plans. To progress this successfully there is a need for significant levels of Indigenous participation across all spectrums of university, from curriculum development, learning and teaching, research protocols and ethical behaviours. To achieve this, Indigenous self-determination must be at the centre to guide and develop the principles of this work. Due to the limited capacity of Indigenous staffing within higher education, this can only be achieved through some level of collaboration amongst academic and professional peers guided within Indigenous leadership and protocol.</p>

Interim Report: Areas for Further Consideration	La Trobe response/comments
<p>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</p>	
<p>a. Setting targets for tertiary education participation and attainment, including for higher education, through consultation with Jobs and Skills Australia (JSA) and the VET sector</p>	<p>Agreed. It is essential to improve the tracking and monitoring of movement of students across the vocational and higher education systems. This would mean, for instance, that enrolled higher education students who transfer to vocational education and successfully complete a vocational course are not considered as “attritted” students but as having “succeeded” in the other arm of the tertiary education system.</p>
<p>b. Setting targets to raise First Nations participation and completion rates in higher education</p>	<p>Strongly agree.</p> <p>-The development of a <i>National Skills Passport</i> could allow Indigenous students to progress through their educational journeys and allow them to manage what they believe is success for them and allow for sequential progress of qualifications when needed within their community.</p> <p>- <i>Regional placement of Indigenous populations</i> and connecting to their country and community whilst gaining an education: The ability to access regional hubs is important as many Indigenous community members who progress into their education may be community leaders or significant members to their community and may be hindered from leaving community to gain educational qualifications. However, in order for greater access and success, there may need to be further design features to support Indigenous communities to enter higher education, including by allowing transitional access programs to build up appropriate academic skills. It is also important to entrench Indigenous understandings within university programs so that students can benefit from an Indigenous presence across all discipline areas.</p>
<p>c. Creating 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 a disability</p>	<p>La Trobe welcomes the Report’s focus on lifting participation from equity groups, though further modelling should be commissioned to ensure these targets are feasible and it is clear that a significant injection of funding will be required to enable these ambitious targets to be achieved.</p> <p>La Trobe also recommends a review of current equity groupings to determine whether they are still fit for purpose and aligned with current terminology, with a dedicated focus on students who fall within multiple equity cohorts and consideration of including ‘First in Family’ as an additional grouping.</p>

Interim Report: Areas for Further Consideration	La Trobe response/comments
	<p>As outlined in further detail in La Trobe's submission to the Accord's Discussion Paper, to improve participation rates, Australia needs a better understanding for the reasons for differing completion rates. This requires:</p> <ul style="list-style-type: none"> •Measures that reflect the circumstances of individuals and that can distinguish between socioeconomic and geographical effects; for example; parental education and occupation; •A participation metric that takes into account the number of people available to participate, in the same manner as employment statistics take into account those available for work. <p>Finally, the quality, availability, and conceptualisation of student equity data has been a consistent frustration of equity researchers, practitioners, and students for many decades. The Accord process offers an opportunity to address these issues and provide the sector with more insightful, actionable, and ethical equity data assets.</p>
d. Developing a universal learning entitlement to ensure Australians can gain the qualifications and credentials as they need or desire	Potentially agree but further information is required on what this actually means and on whether, as argued by Professor Norton , it would function as a 'cap'.
e. As priority element of the universal learning entitlement, ensuring that all students from equity cohorts are eligible for a funded place at university.	Further clarity is required. Does this mean that universities will have less autonomy over who they enrol or does it mean that there are enough places in the system to accommodate an increase in equity student enrolments?
C. Meeting Australia's future skills needs	
a. New policy levers to enhance capability across the tertiary education sector, enabling it to respond rapidly to Australia's skills needs and deliver the necessary numbers of graduates with professional, disciplinary and high order generic skills	Yes, potentially but not clear what policy levers are being referred to here.
b. The creation of a universal learning entitlement that helps all Australians access high-quality tertiary education and makes lifelong learning a reality	See response to B.d.
c. Examining new and effective mechanisms for rapid reskilling, including microcredentials	Strongly agree

Interim Report: Areas for Further Consideration	La Trobe response/comments
d. Improving the integration of higher education and VET to create new types of qualifications –starting in areas of national priority – like clean energy, the care economy, and defence	Strongly agree
e. Improving skills pathways by creating qualifications that are more modular, stackable and transferable between institutions and institution types	Strongly agree
f. Addressing barriers that prevent VET and higher education working together, especially in courses and institutions that involve both sectors	Strongly agree, though it is not clear how the biggest barrier (the fact that states have control over VET while higher ed is a federal competence) will be tackled. Some of these barriers include: – the way in which TAFE qualifications are updated, which is currently a significant challenge for VET students aiming to move into higher education; and - a lack of data to help track and monitor movement of students across the vocational and higher education systems.
g. Using arrangements between industry, unions and governments to progress the recommendations of the Review of the Australian Qualifications Framework (AQF) – this should be a matter of priority	La Trobe agrees that the AQF should be reviewed, however we would propose a lighter review than the one proposed by the Noonan Review. The focus should be on establishing a policy for microcredentials and their levels, to simplify language and recognise that both higher education and vocational education providers deliver skills, and to incorporating pre-university programs.
h. Extending CSPs at some AQF levels to the TAFE sector in areas of crucial skill need	Agreed in principle but it is not clear how this would interact with Fee-FREE TAFE in many states and territories, which is already being offered in areas of crucial skills needs.
i. Improving the Recognition of Prior Learning (RPL) and relevant work experience through a national skills passport or similar mechanism	Agree
k. Improving Work Integrated Learning (WIL) and placements by providing participating students with better incentives and financial support	La Trobe strongly supports providing support for students to undertake placements particularly in rural, regional and remote areas. However, it is important to note that this is not the only issue impacting placements with different challenges in different disciplines.

Interim Report: Areas for Further Consideration	La Trobe response/comments
	For instance, as outlined in its response to this Interim Report, the Psychology Training and Public Health Workforce Alliance, in some states (including Victoria), universities must pay for placements in public health services. This makes it harder for universities to increase student training places due to the added expense of paying for more placements. Providing support to public health services to enable them to offer placements without charging fees to universities would be highly beneficial.
I. Establishing a national jobs broker system, to assist students to find work placements and part-time jobs in their fields of study.	Yes, but our experience is that the key issue is the finite availability of placements as well as the costs (both to universities and to students) of undertaking a placement.
D. Equity in participation, access and opportunity	
a. Encouraging students from underrepresented groups to aspire to higher education and fulfil their potential	Strongly agree
b. Making it easier for students to enter, exit and return to higher education through a consistent national approach to tertiary education admission and the recognition of existing learning experience and credentials	Agreed but further information is required on what a 'consistent national approach to tertiary education admission' means.
c. Increasing access to preparatory and enabling programs to provide more pathways into higher education	Strongly agree. La Trobe is strongly in favour of universities having full flexibility within the funding envelope including to use CGS for preparatory and enabling programs.
d. Providing scaffolded learning support to help students achieve their qualification in minimum time and with minimum debt	Agree
e. Through a national jobs broker system, helping students find part-time work in their areas of study	Yes, potentially though more detail on a 'national jobs broker system' is required. It is worth noting that many students studying in regional communities are already in the workforce in their areas of study. So a key factor in this area is to engage employers and to garner their support to help students complete their studies.
f. Exploring the potential for a student-centred, needs-based funding model (similar to that used for determining school	-La Trobe would support a hybrid model whereby the majority of funding would still be per discipline but also including student-centred elements.

Interim Report: Areas for Further Consideration	La Trobe response/comments
<p>funding) that recognises the additional costs involved in teaching students from equity groups and underrepresented communities</p>	<p>-Supportive of a model that recognises additional costs involved in teaching students from equity groups. Such support should recognise the interchangeability and the cumulative disadvantage of membership of multiple equity groupings. The current equity-related funding pool enables universities to put in place systems of student support but it does not cover any additional costs relating to any adjustments to academic teaching that may be required to cater for a particular equity cohort .</p> <p>– It is also important to note that the cost of supporting students is not necessarily linked to load. i.e. a student studying part-time is likely to access as much (if not more) support than a full-time student. The Accord should pay particular notice to the cumulative challenges for part-time students.</p> <p>- Rather than having several small buckets of equity-related funding, universities should be able to pursue their own equity targets depending on their individual circumstances, location and the communities they serve. This could mean consolidating all equity-related funds into a single pot of funds, with more flexibility given to universities to target their areas of need. This would also incentivise long-term projects supporting equity targets instead of short-term projects. Universities would then be held accountable via mission-based agreements, as monitored by a new TEC.</p> <p>In terms of Indigenous students, La Trobe notes the following:</p> <p>- Indigenous Student Support Program: Funding through the Indigenous Student Support Program (ISSP) should include considerations to the regional expenses of education and the absolute requirements of safe cultural trusted spaces for Indigenous students within higher education institutions. Another financial requirement would include the considerations of progress of Indigenous students with only 50% completing a degree within a 9-year period. This means 50% of Indigenous participants leave university without a degree but a significant debt, especially with many Indigenous students participating in programs in health and humanities that have had higher fees attributed to their programs in recent years due to the JRG legislation. Some considerations of debt waivers should be considered to allow Indigenous communities to be able to extend themselves within Australian society. The identification of some level of needs-based funding must be considered to better allow an improved participation of Indigenous communities.</p>

Interim Report: Areas for Further Consideration	La Trobe response/comments
g. Reducing the cost of living barriers to higher education through improved income support measures and more opportunities for part-time study	<p>Strongly agree. To achieve this, La Trobe recommends the use of policy levers outside the higher ed system:</p> <ul style="list-style-type: none"> -Centrelink support: Currently there is no incentive for mature age persons in full-time work to access education and reduce their income. Most mature age persons remain outside of the higher education system or do not take the opportunity to reskill because they have no other means of financial support outside of paid work. This is major barrier in regional, rural and remote areas. -Age of independence: The current rules determining the “threshold for independence” to access Austudy support make it very difficult for younger students of school-leaving age to qualify for benefits. The Bradley Review recommended reducing the age of independence from 25 to 22 years. To maximise the benefit of this recommendation, we recommend reducing the age of independence to 19. -High cost of childcare: The high cost of childcare is a significant barrier for participation for students with caring responsibilities. La Trobe acknowledges that new childcare benefit arrangements have come into force since July 2023, which may ease the burden. Federal and state governments should consider extending the hours of fee-free Kinder and consider fee-free childcare especially in regional areas. -Maximum completion times: These are also a barrier for students who are studying part-time or who need to take career and study breaks e.g. people with caring responsibilities
h. Revising student contribution amounts and HELP repayment arrangements to ensure students are not being overly burdened with debt and that repayment arrangements are fair and integrate more effectively with the wider tax and social security system.	Strongly agree
E. Excellence in learning, teaching and student experience	
<p>a. Encouraging and rewarding effective learning and teaching practices, including best practice for digital and hybrid delivery modes and use of new technologies and structures, particularly artificial intelligence and knowledge repositories</p> <p>b. Enhancing the professional development of academic staff in teaching, especially for those newly employed to teach</p>	Strongly agree. La Trobe recommends a renewed focus on recognition for learning and teaching excellence across the higher education and vocational sectors and providing support for programs (e.g. fellowships) that allow for scholarship and practice innovations to be shared by expert staff working within and across those sectors.

Interim Report: Areas for Further Consideration	La Trobe response/comments
<p>c. Promoting collaboration and shared best practice in learning and teaching</p> <p>d. Ensuring the system encourages improvements in quality learning and teaching, responds to new curriculum approaches that take account of the pace of new knowledge production, and provides for appropriate teaching infrastructure.</p>	
<p>F. Fostering international student engagement</p>	
<p>a. Ensuring that international education supports broader Australian foreign policy objectives, for example, strengthening relationships with India and the Pacific</p> <p>b. Making international education more embedded within the mission of the Australian tertiary education system and to the mission and purpose of individual institutions</p> <p>c. Ensuring the integrity and accessibility of visa pathways for international students</p> <p>d. Promoting flexibility and innovation in international education, including digital and offshore delivery options</p> <p>e. Providing a high-quality university experience for international students</p> <p>f. Improving overseas skills and qualification recognition and expanding international professional qualification accords</p> <p>g. Promoting international commercial use of Australian research capability</p> <p>h. Building closer connections between institutions and their international alumni.</p>	<p>Strongly agree</p>
<p>G. Serving our communities</p>	
<p>a. Recognising and formalising the crucial role institutions play in their communities through the Accord process and mission-based compacts</p>	<p>Strongly agree. These strong links are already present and working well especially for universities with regional footprints such as La Trobe.</p>

Interim Report: Areas for Further Consideration	La Trobe response/comments
<p>b. The creation of stronger links between industry and education, particularly in regional areas and other areas with low participation and attainment rates</p> <p>c. Encouraging institutions to draw on the strengths of their alumni communities.</p>	
H. Research, innovation and research training	
<p>To protect research basics, the Review is giving further consideration to the following policy areas:</p> <p>a. Developing a funding mechanism that explicitly recognises the importance of research, innovation and scholarship</p> <p>b. How best to ensure sufficient funding for the Australian university research sector to meet national research priorities</p>	<p>As argued in Reflection 1, the Accord must make a stronger statement on the targets required in terms of investment in Research and Development (including basic research), in order to meet our expectation of performance relative to comparable OECD countries. It is crucial that the Australian Universities Accord sends a strong message on the need for adequate research funding and the strong link between a strong research system and a strong country.</p>
<p>c. Moving over time to ensure National Competitive Grants cover the full cost of undertaking research</p>	<p>Yes, provided that the overall research funding envelope is increased – otherwise it would mean a further concentration of research effort in few institutions and even worse success rates. Universities should not be required or expected to make a contribution in cash for any Category 1 or Category 3 research. As a first step, we recommend a target of funding the indirect cost of research (across whole-of-government) at 50 cents to the dollar with a move towards funding the full cost of research as the longer-term goal.</p>
<p>d. Developing a national, holistic policy for research training</p>	<p>La Trobe supports development of a national, holistic policy for research training:</p> <ul style="list-style-type: none"> ○ La Trobe does <u>not</u> support specialised doctoral centres. All universities should be able to train their own research students in the areas of research they deem fit. ○ However La Trobe believes that the impediments to cross-institutional collaboration to support research training (joint supervision) should be removed ○ The Accord should pay special consideration to devising an approach where genuine cross-institutional research training supervision is enabled for First Nations academics and students
<p>e. Improving the measurement of the quality and impact of Australian research, including by deploying advances in data</p>	<p>La Trobe recommends that:</p>

Interim Report: Areas for Further Consideration	La Trobe response/comments
science to develop a 'light touch' automated metrics-based research quality assessment system	<p>- TEQSA draw on ARC expertise to assess "world standard" for subset of research activity where unis are seeking re/accreditation</p> <p>- ARC to evaluate current strategic research capability (e.g. national science priority areas, First Nations research) – and gaps. This would be based on metrics plus peer review for subset of research activity (i.e. research and teaching and research staff top 10 quality outputs/ HERDC report) across the country for relevant fields of research. This approach would reduce the workload for the ARC, for institutions and remove the "league table" competition for researcher CVs.</p>
f. Making the cost of university R&D, innovation and scholarship activities across all universities transparent	Agree
g. Ensuring ongoing investment in critical research infrastructure and its maintenance.	Strongly agree
<p>To share and translate university research more effectively, the Review is giving further consideration to the following policy areas:</p> <p>a. Developing metrics to understand industry/university and government/university research collaboration and translation</p>	Agree. See answer to H.e.
b. Encouraging government to become an exemplary user of university research, using it to address nationally significant complex problems and enhance sovereign capabilities and becoming an example to industry on how to use university research capability.	Strongly agree. Accordingly, it is essential that with regard to Category 2 research (Other Public Sector/R&D income), governments themselves (local, state and federal) move towards covering the full cost of undertaking the research they commission. As a first step, we recommend a target of funding the indirect cost of research (across whole-of-government) at 50 cents to the dollar with a move towards funding the full cost of research as the longer-term goal.
c. Exploring mechanisms that keep universities, industry and government informed of nationally significant research problems, and of nationally significant research capabilities in the higher education system	Strongly agree

Interim Report: Areas for Further Consideration	La Trobe response/comments
d. Extending the use of research brokers and research challenge mechanisms and bodies	Agree provided that this additional layer makes related administration more rather than less efficient
e. Encouraging academic consulting, and improving university capability to do such work	Yes, but universities and academics should not be expected to provide this pro-bono.
f. Establishing a target for the number of PhD candidates employed in industry undertaking a PhD relevant to their firm.	Agree
Creating the foundations of a high functioning national system	
A. A coherent national system	
<p>a. The benefits of establishing a new national body, a Tertiary Education Commission, working with the Minister and Department, which could be based on the principles of independence and expert decision-making to provide oversight, coordination and expert advice to the higher education sector</p> <p>ii. lead relevant analysis, including with other agencies, to provide advice to government on policy and funding settings to enhance student, teaching and research outcomes</p> <p>iii. function as a pricing authority for Commonwealth higher education funding for the purposes of a potential student-centred, needs-based funding model</p> <p>iv. negotiate new mission-based compacts with institutions to deliver against local, regional and national priorities and needs</p> <p>v. over time, and in partnership with the states and territories, be expanded from higher education to encompass the whole tertiary education system to pursue greater opportunities for alignment and collaboration between the higher education and VET sectors.</p>	<p>La Trobe supports the proposal for a TEC, charged with overseeing the development of a fit-for-purpose tertiary system and operating with a degree of independence from Government. As outlined in Reflection 2, a key priority for the TEC should be the formulation of an overarching plan for higher education in Australia, which will outline in detail how the targets and the priorities of the Accord will be achieved, including the mix of higher education providers which are needed to deliver the planned growth in the system. In the last decade, the sector has been subject to consecutive policy changes, at times aimed at genuine reform but more often aimed at containing expenditure.</p> <p>A strong TEC would provide much needed stability for providers, students and industry. In turn, the sector would be in a better position to innovate and change to address national priorities whether they are areas of skills shortages or research priorities. La Trobe supports the Accord’s proposal for the TEC to work closely with the regulator (TEQSA) to enable “innovation in the tertiary education system”. Functioning as a ‘Guardian of the Accord’, and working as a conduit between the Government, the sector and the Department of Education, we believe that a TEC has the potential to provide much-needed stability and structure to Australia’s tertiary education landscape.</p>

Interim Report: Areas for Further Consideration	La Trobe response/comments
<p>b. How to facilitate and encourage change and evolution in the type, diversity, size and number of tertiary education institutions, including:</p> <ul style="list-style-type: none"> i. the merits of a new National Regional University as Australia's second national university ii. encouraging and incentivising new models of delivery and collaboration to increase tertiary education and research provision, particularly in regional and under-serviced areas iii. facilitating the emergence of institutions specialising to a greater or lesser extent in teaching or research 	<p>It is clear that in order to reach the targets set out in the Interim Report, an increase in the number of institutions providing higher education will be required.</p> <ul style="list-style-type: none"> i. The Accord should look at a suite of approaches that would address the current challenges of regional higher education including the pros and cons of a national regional university. ii. Facilitating university-TAFE partnerships would be the first step iii. Greater specialisation in teaching and research for different institutions can and should be explored.
<p>c. Ensuring tertiary education regulation, including the role of the Tertiary Education Quality and Standards Agency (TEQSA), enables innovation in the tertiary education system</p>	<p>Agree</p>
<p>d. Continually working towards an aligned tertiary education system, including encouraging parity of esteem between the VET and higher education sectors</p>	<p>Strongly Agree</p>
<p>B. Strengthening institutional governance</p>	
<ul style="list-style-type: none"> a. Improving student wellbeing and safety, including empowering students on matters that affect them b. Improving operational practices and supporting governing bodies to improve their effectiveness c. Enhancing wellbeing for staff, and appropriate workforce arrangements d. Ensuring higher education institutions develop appropriate governance frameworks to avoid underpayment of staff e. Through an ongoing Accord process, bringing together staff, unions, institutions and governments to consider policy settings, awards and institutional workforce structures 	<p>Agree</p>

Interim Report: Areas for Further Consideration	La Trobe response/comments
<p>f. Providing explicit support for tutors, research trainees and others on the boundary between student and staff status, and enhancing career stability for early career academic staff</p> <p>g. Considering improvements to the voluntary national code of practice and governance for university councils, and council composition to recognise the importance of expertise and leadership in teaching and research</p> <p>h. Examining whether current reporting arrangements demonstrate effective and efficient use of government funds by higher education institutions</p> <p>i. Considering development of a national student charter to ensure a consistent national approach to the welfare, safety and wellbeing of all students.</p>	
<p>C. Sustainable funding and financing</p>	
<p>a. Establishing a framework of strong values and clear principles for public and private investment that underpins the higher education funding system</p>	Agree
<p>b. How best to design a funding model which provides longer-term stability, that is dynamic in responding to changes in student mix and demand, and that protects against rapid shifts in funding that are beyond the capacity of institutions to adapt</p>	Agree
<p>c. How to establish a new funding model for higher education, that:</p> <p>d. Is student-centred, needs-based, ensuring the funding available is sufficient to provide access to high-quality higher education for students from equity backgrounds and from different locations</p> <p>e. Helps achieve attainment and equity targets, and recognises the different costs of delivery in regional Australia</p>	<p>Please see Section D. f.</p> <p>d. La Trobe would support a hybrid model whereby the majority of funding would still be per discipline but also including student-centred elements</p> <p>e. Strongly agree especially with regard to the higher cost of delivery in regional Australia.</p> <p>f. Agreed but the Accord should aspire to more than just a 'strengthening' of Australia's higher education capacity.</p>

Interim Report: Areas for Further Consideration	La Trobe response/comments
f. Strengthens Australia's higher education research capacity	
g. Developing a stronger understanding of the true costs of the core activities in higher education, increasing transparency and improving pricing, quality, performance and efficiency	Agree- though a lot of this information already exists and would caution against more administrative burden.
h. Ensuring the ongoing affordability of higher education for students, including adjusting student contributions instituted by the JRG package	Absolutely. Implementation of the JRG has demonstrated, as the sector had cautioned, that students do not respond to price signals. A fairer and more equitable student contribution system is required.
i. Examining changes to HELP to make it fairer and support growth in participation	Agree
j. Identifying ways to support and maintain critical teaching and research infrastructure	Agree
k. Reducing the extent to which core higher education functions rely on funding from insecure income streams, and decreasing the extent of cross-subsidisation throughout the system	Agree. But if no funding for research will be available via cross-subsidy, then it is even more imperative for the issue of research funding to be elevated and to be addressed at the same time as the equity challenge.
l. Examining a funding mechanism such as a levy on international student fee income. Such a mechanism could provide insurance against future economic, policy or other shocks, or fund national and sector priorities such as infrastructure and research.	La Trobe does not support a levy on international student revenue to support investment in other areas. Universities already pay a number of levies linked to the recruitment of international students, namely the CRICOS Annual Registration Charge and the Tuition Protection Service Levy.