Prologue 31 August 2023

On behalf of Curtin University, I welcome the opportunity to respond to the Interim Report put forward by the Accord Panel. I acknowledge the open and honest way that the panel and the Minister have approached the task in front of us. The Accord provides an inspiring vision for Australian Universities, recognising their role in building a fair and civil society, a vibrant and competitive economy, and an equitable democratic culture. At Curtin, we embrace the challenge of tackling Australia's big national priorities of lifting economic productivity, making a clean energy transition, building a caring society, meeting the defence and security challenges of our region, and strengthening our democratic culture.

As a country with a small population and a relatively young higher education sector, we have much to be proud of:

- 15 Australian universities are ranked in the top 200 in the world (QS World University Rankings 2024). Within this group of highly ranked countries, Australia has 39% of universities in the top 200 placing us ahead of the United States and the United Kingdom.
- We are strongly connected with industry and our communities, and our missions focus on making an impact.
- We make strong contributions to smart diplomacy and diversity through international education with over half a million international students from over 100 different countries enrolled in education services across Australia in 2023. We also host physical campuses around the world.
- We are excellent employers providing some of the most generous conditions of any industry in Australia, including significant leave and severance provisions and 17% superannuation contributions.

In addition to these general points of pride, there are also things that make me particularly proud of Curtin:

- Our governance structures are sector leading. When externally reviewed in 2019, Emeritus Professor Geoffrey Kiel concluded that "the governance processes and functioning of the Curtin University Council are very robust and in accordance with contemporary thinking about Australian university governance. Curtin University can lay claim to having sector leading university governance." (The full report can be made available to the panel upon request).
- Curtin has a long-standing track record in regional, rural, and remote education. We have a wellestablished campus in Kalgoorlie and have been a foundation member of the Geraldton Universities Centre since 2001.
- Curtin is the largest provider of education through the Open Universities Australia (OUA) platform. Many of our students who study through OUA are resident in regional, rural, and remote areas, and a high proportion belong to one or more equity groups. In fact, participation rates for equity groups through Curtin OUA programs are stronger than those through traditional delivery methods.
- We are the home of Australia's youngest medical school whose primary focus is to provide general practitioners for regional, rural, remote, and Aboriginal communities.
- We provide both enabling and degree-level education into the Australian prison system—supporting some of the country's most vulnerable citizens.
- Since 2013, we have hosted the National Centre for Student Equity in Higher Education (NCSEHE). In 2022, NCSEHE received \$20.5 million over four years to extend the reach and efficacy of the Centre; the renewed mission of this Centre is to trial effective interventions designed to enhance the success of equity groups.
- Curtin was a pioneer of transnational education. We now have a well-established international footprint in Singapore, Dubai, Malaysia, Mauritius, and Sri Lanka.
- We actively foster Aboriginal and Torres Strait Islander higher degree research students with realistic support packages (Appendix 1).

• Our graduates are highly employable. In the latest Australian Government's Quality Indicators for Learning and Teaching (QILT) Employer Satisfaction Survey (ESS) our graduates were rated the best in Australia for employer satisfaction, showing they have the skills and qualifications employers value, want and need.

Despite all these strengths, as sector, we are also facing challenges and change is required:

- Australian universities have focused on building equity group participation, but further work is required to strengthen the success of equity students. NCSEHE has a vital role to play in our success.
- Our research funding has fallen well below the Organisation for Economic Co-operation and Development (OECD) average.
- We are overburdened with regulation, compliance and reporting that comes at considerable cost in terms of both time and money.
- The current funding model of the Australian universities is insufficient and unsustainable. Most universities, particularly those that are younger, and that lack substantial endowments, would not survive without their international student income.
- Finally, support for domestic students is insufficient. Students are struggling to study whilst having to work long hours in paid employment to cover increasing living costs, this is particularly true for equity students. At Curtin, 77% of our students are working while studying. Consequently, it is difficult for many students to undertake the required placements for their degree due to foregone income. The rising mental health crisis in universities is due in large part to the economic stresses students currently experience. Food insecurity among our students in on the rise.

We have a long journey ahead of us. I strongly encourage the panel (and the Government) to move slowly, carefully, and in ongoing consultation with all the universities as we continue to work together to build skills growth through equity. Any proposed alterations to the system must be carefully considered against the potential suite of unintended consequences of any given change. Alterations to the system that are designed to address our challenges should not come at the expense of our current strengths, and they most definitely should not make our current challenges worse. Finally, we must all acknowledge the elephant in the room—significant investment will be required to achieve our mutual aspirations.

In closing, Curtin University shares the Minister's ambition for equity participation and success. We proudly bear the name of Australia's 14th Prime Minister, the Hon. John Curtin—a leader who believed that everyone deserved a chance. We share this belief. Equity is in our DNA. We welcome the opportunity to work with the Panel and with Government on ways that we can meet our skills shortages in Australia, but more importantly, we look forward to finding the most effective and sustainable ways to enhance the opportunities for all Australians, improving lives for generations to come.

Professor Harlene Hayne, CNZM Vice Chancellor, Curtin University

Executive Summary: Curtin's Response to the Panel's Interim Report

Priority Action 2: Cease the 50% pass rule, given its poor equity impacts, and require increased reporting on student progress

Curtin strongly supports the removal of this punitive policy. In our experience, students fail for a variety of reasons and many fail for reasons that are outside of their control (e.g., they get sick, a family member gets sick, they have to work, they are balancing family responsibility and study, a pandemic strikes). Equity students are over-represented in those captured by the current 50% pass rule, particularly students from low SES backgrounds. In our view, challenging life circumstances should not be compounded by the removal of Commonwealth support for further study. Curtin has well established policies, practices, and procedures to identify and support students who are risk of failure. We can see no value in additional reporting requirements beyond those we currently adhere to. We want our students to succeed. But we must also acknowledge that sometimes life intervenes. No one is at fault. Second chances are important. Additional Commonwealth support for students' living costs would also help to ease the burdens that many face, increasing their chances of success.

Priority Action 3: Ensure that all First Nations students are eligible for a funded place at university by extending demand-driven funding to metropolitan First Nations students

Curtin strongly supports extending demand-driven funding to all First Nations students. We agree with Minister Clare that your postcode should not determine your access to university. We also believe that everyone should have the opportunity to participate in the economy of the future, and we know that the bulk of new jobs will require higher education. As we continue to build a strong Australia, investment in our workforce of the future should be a high priority for all of us. Extending funded places to all First Nations people is a step in the right direction.

Priority Action 4: Extension of the Higher Education Continuity Guarantee

Although we understand that transitional arrangements are required for some institutions as we move to a new funding model, we are concerned that the continuation of the Higher Education Continuity Guarantee (HECG) will perpetuate the competitive advantage for those institutions that have <u>not</u> enrolled to their Maximum Basic Grant Amount (MBGA) and will disadvantage those that have enrolled above the MBGA.

The panel has recommended that Universities under the MBGA use the additional revenue to support equity students. Although this is a laudable goal, those universities that are currently over the MBGA will not have similar headroom even though they have expended resources to attract more students and build equity attainment levels. These costs are significant. A <u>recent study</u> found that full-time low socio-economic status (SES) students are four to six times more expensive to support. The study suggested that the average annual cost of a low SES undergraduate student full-time enrolment was AUD\$109,430, compared with the average cost for medium and high SES students at AUD\$17,360. ¹

A potential mitigating solution could be to extend the existing allocation of additional Equity Commonwealth Supported Places (as per the 20,000 extra equity places implemented last year for 2023 and 2024) to 2025 and 2026. This very successful program would further strengthen efforts across the sector to build equity group participation and success. This solution will ensure that the entire higher education sector is provided with an opportunity to help achieve the Federal Government and our goals to build equity participation and success.

¹¹ The costs of and economies of scale in supporting students from low socioeconomic status backgrounds in Australian higher education: Higher Education Research & Development: Vol 42, No 2 (tandfonline.com)

Introduction of an International Student Levy

The introduction of an International Student Levy has the potential to significantly disrupt the international competitiveness of the Australian higher education sector and negatively impact Australia's fourth largest export.

Microeconomic research has shown that whenever taxes or levies have been introduced by Government to goods and services (for example goods and services tax, stamp duties and fuel excises) the cost of this tax must be absorbed by the consumer. In this way, an International Student Levy will lift the price that international students must pay. We know that the cost of study and living rate are in the top six decision-making factors for international students. We have observed the price sensitivity of international education when exchange rates have fluctuated. There is a significant correlation between a strong Australian dollar and commencing enrolment numbers (see Appendix 2).

The global higher education market is a highly competitive environment. Price competition from Canada, the United Kingdom and United States has been defended in Australia through the use of carefully designed scholarships. These same scholarships, however, have eroded the margin on international student income. Margins have been stressed further by the additional services required to support international students. A tax will only make the situation worse.

We would also question the rationale for the introduction of the International Student Levy. Our university sector is made up of a very diverse set of institutions, that have implemented a variety of strategies to achieve their missions. Some institutions have embraced transnational education for the many benefits it provides, whilst others have made choices to focus on alternative strategies. The introduction of a levy on those institutions who have made strategic choices that others have not feels inequitable and counterproductive for the sector.

Introduction of Tertiary Education Commission (TEC)

We express concern regarding the establishment of a further regulatory body with the scope outlined in the interim report. Many of the proposed functions of the TEC are already monitored and regulated through other means. Furthermore, history has shown us that these types of regulatory bodies tend to expand in scope, duplicate existing regulators efforts, and increase the cost, reporting and administrative burden for institutions. The regulatory burden currently placed on the higher education sector is already a key factor driving the cost of higher education in Australia, and it is impacting the financial sustainability of institutions. The impact of increasing regulation and reporting is well-recognised:

"because universities undertake such a wide range of activities they are subject to a very wide range of regulatory obligations, perhaps more than any other type of organisation or business" and "because these obligations are to multiple State and Commonwealth agencies, there is no single agency that sees the full scope of the regulatory burden, and there is no agency or group with any form of obligation to oversee or coordinate the multiple regulatory and reporting requirements."

2013 Phillips KPA "<u>Review of Reporting Requirements for Universities</u>" report.

The Group of Eight report (2022), "Essential decisions for national success; reducing the regulatory overload on our universities" further highlighted that significant reporting obligations are placed on universities, and the sector continues to be increasingly "subjected to new or significantly amplified regulatory requirements - many of which fall outside the higher education portfolio" and "at the same time, there has been a proliferation of new, often overlapping, regulation and associated red-tape and it is difficult to find any instance where obsolete or duplicative regulation has been removed". The report has outlined that the cost impact to universities has been significant. New positions have been created to service the compliance impact and reporting, complex systems have been installed or created, vital resources have been diverted from core duties to ensure regulatory compliance and completion of reporting requirements, and senior managers have had to engage in time consuming complex dialogue and negotiation with Government.

In financial terms, the cost of compliance-based regulator reporting was estimated [in 2013] to be \$280 million across the sector. Given the increase in regulatory burden since 2013, it is now estimated that the current cost has exceeded \$500 million (see Appendix 3 for some examples of the regulatory mechanisms the sector is currently servicing).

In addition to increased compliance burden, we are also concerned about the potential powers that the TEC will have and the tension between existing legislation at both Federal and State level. The sector already experiences significant duplication across this complex regulatory environment, and the introduction of the TEC is likely to increase this level of duplication.

We would recommend that consideration be given to incorporating the scope of the activities of the committee be integrated into existing processes and regulatory frameworks.

Research

The Interim Report emphasises the value of research and the need to ensure its appropriate resourcing. Australia delivers outstanding research quality, ranking 8th - 10th in a variety of measures (Appendix 4). Our achievements are delivered despite low and declining government expenditure on research and development, where we rank 22nd relative to other OECD countries. Curtin University welcomes the emphasis on 'getting the foundations right and protecting the basics'. In order to deliver on the potential impact of our research, it would be useful if the Final Report provided direction on mechanisms to fund more fully the cost of research.

Better resourcing the National Health and Medical Research Council (NHMRC) and Australian Research Council (ARC) to allow provision of the full cost of research in grants is a good recommendation. However, it is likely that success rates will remain low, particularly if the total pool of funds available remains constant. There is a risk that if education and research funding is decoupled, there will be a gap in research funding for early-stage fundamental research that is not yet sufficiently developed to attract competitive national grants. This critical pilot stage research and foundational development of ideas is the engine room for Australia's research and future commercialisation success and relies on flexible research funding from universities. Higher degree research contributes substantially to the success of these early-stage endeavours and its resourcing from a combination of grant funding and university contributions from Research Support Program (RSP) and Research Training Program (RTP) allocations allows universities to support priority areas of research with agile flexibility. Curtin agrees with the recommendation to mandate an increase in higher degree by research stipends, funded through an increase in the RTP allocation. An increased research and development tax incentive for businesses that invest in university research could contribute further.

University research is currently subject to significant financial pressure that is demoralising the current and future workforce. A combination of judicious investment in nationally competitive grant schemes, flexible funding models for universities, and incentives for industry to invest their research and development funds in the sector, will allow research in Australia to flourish.

Funding Model

Going forward, the current funding model will require substantial thought as we attempt to balance our shared goal of enhancing access and success. Securing sufficient funding will undoubtedly take time. We are keen to support the Minister as he works with his colleagues to prioritise higher education funding among all of the other competing demands. In the short-term, however, we would strongly encourage that the current funding model is modified to make the student contributions more equitable across courses. Using price as a lever to influence student choice simply does not work as it was intended. Until we have a new model, the current one needs to evolve so that it is equitable and sustainable for both students and universities.

Appendix 1: Support for First Nations Higher Degree Research Students

Across all its research endeavours, Curtin University is committed to developing culturally appropriate ways to improve the lives and enhance the futures of Aboriginal and Torres Strait Islander people. As part of this commitment, the University provides generous scholarship packages to people from Aboriginal and Torres Strait Islander backgrounds who are studying for a higher degree by research.

The Curtin Aboriginal and Torres Strait Islander Research Scholarship package includes an extendable threeyear living allowance and access to the standard \$9,000 worth of student grants to support research.

Female Aboriginal and Torres Strait Islander recipients may also be eligible for the Bertrond and Edith Donohue Scholarship Endowment, which includes a further \$12,500 top up scholarship for a maximum of three years.

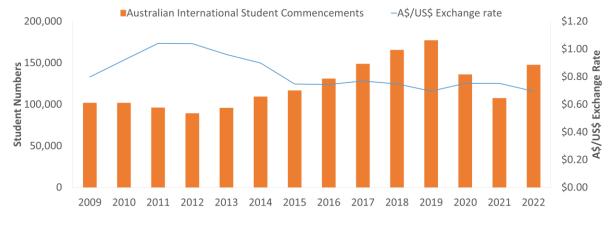
The maximum value of the annual scholarships (base stipend and top up) is \$70,000 per year for four years.

Grantley Winmar, a Ballardong Nyungar man, is currently pursuing his higher degree research journey through Curtin's School of Education and has found the support very important.

"The Curtin University Aboriginal and Torres Strait Islander Research Scholarship has afforded me the opportunity to wholeheartedly immerse myself in my research thesis, unburdened by the additional financial pressures that are often associated with being a full time HDR student. This scholarship has not only expedited my academic journey but has also granted me the privilege of pursuing full-time research at juncture much earlier in my career that would have otherwise not been possible.

"The journey of Aboriginal and Torres Strait Islander peoples towards comprehensive engagement in the HDR space often is beset with a number of multifaceted challenges. In this context, initiatives like the Curtin University Aboriginal and Torres Strait Islander research scholarship stand as imperative commitments by institutions, offering a much-needed platform for Aboriginal and Torres Strait islander Individuals to whole heartedly dedicate themselves to their research pursuits.

"Curtin University's provision of this scholarship exemplifies profound dedication to leading the way in nurturing the development of further Indigenous scholars. I am profoundly appreciative of this opportunity and the unwavering support extended by Curtin University including its leaders, its support staff, academic staff, and my supervisors."



Appendix 2: Exchange Rates and Student Commencements

Data source: Student enrolments <u>https://www.austrade.gov.au/australian/education/education-data/current-data/pivot-;</u> RBA exchange rates: <u>https://www.rba.gov.au/statistics/historical-data.html</u>, accessed 7 June 2023

Appendix 3: Sample of University Regulatory and Reporting Burden

Below is a non-exhaustive list:

- Modern Slavery Act 2018 (Cth)
- Security of Critical Infrastructure Act 2018 (Cth), Security Legislation Amendment (Critical Infrastructure) Act 2021 (Cth), and Security Legislation Amendment (Critical Infrastructure Protection) Act 2022 (Cth)
- Foreign Influence Transparency Scheme Act 2018 (Cth)
- Heritage Act 2018 (WA)
- National Redress Scheme for Institutional Child Sexual Abuse Act 2018 (Cth)
- Space (Launches and Returns) Act 2018 (Cth)
- National Security Legislation Amendment (Espionage and Foreign Interference) Act 2018 (Cth)
- Australian Code for the Responsible Conduct of Research 2018
- National Code of Practice for Providers of Education and Training to Overseas Students 2018
- ELICOS Standards 2018
- Treasury Laws Amendment (Enhancing Whistleblower Protection) Act 2019 (Cth)
- Industrial Chemicals Act 2019 (Cth)
- Australia's Foreign Relations (State and Territory Arrangements) Act 2020 (Cth)
- National Disability Insurance Scheme (Worker Screening) Act 2020 (WA)
- Work Health and Safety Act 2020 (WA)
- Tertiary Education Quality and Standards Agency Amendment (Prohibiting Academic Cheating Services) Act 2020 (Cth)
- Tertiary Education Quality and Standards Agency Amendment (Cost Recovery) Act 2021 (Cth)
- Education Services for Overseas Students (Registration Charges) Amendment Act 2021 (Cth)
- Online Safety Act 2021 (Cth)
- Aboriginal Cultural Heritage Act 2021 (WA)
- Data Availability and Transparency Act 2022 (Cth)
- Parliamentary Commissioner Amendment (Reportable Conduct) Act 2022 (WA)

Additional regulations, requirements and reporting include:

- Fourteen amendments to the Higher Education Support Act 2003 (Cth) between 2018 and 2023, including changes to introduce the Job-Ready Graduates package and freedom of speech amendments
- Amendments to the Fair Work Act 2009 (Cth)
- New sanctions under the Autonomous Sanctions Act 2011 (Cth)
- Guidelines to Counter Foreign Interference in the Australian University Sector (UFIT Guidelines)
- National Principles for Child Safe Organisations and the Commonwealth Child Safe Framework
- DFAT child protection policies
- COVID-19 rules, regulations and direction
- DET Student Data Submission
- DET Student Verification of published Government Student numbers
- DET Staff Data Submission
- DET Staff Verification of published Government Staff numbers
- DET Quarterly/Annual (EFTSL) Estimates
- DET Application Estimates (approx. 2-3 time per year)
- DET Financial Data Submission
- DET Research Data Submissions
- State Government WEGA, EEO and HR Benchmarking Data Submissions
- State Government Annual Report
- State Government, Office of the Auditor General, audit of the Annual Report

Appendix 4: Australian Research Performance in Context

Summary

Australia's research performance outperforms expectations based on overall research and development (R&D) investment intensity and government budget allocations to R&D. This performance is seen both with respect to overall volume of research and research quality. However, government investment in Australian R&D is below comparators in both gross and normalised measures and is shrinking. While Australia "punches above its weight", it is hard to see how that can be maintained in the face of shrinking government investment.

Background

Australia is commonly described as "punching above its weight" with respect to research performance. These analyses are built on closed and proprietary data sources and opaque indicators that cannot be validated or critiqued.

For this reason, the Curtin Open Knowledge Initiative is undertaking a global research performance analysis based on open data, and openly available analysis procedures. The basis of this analysis is to apply the design of the ERA23 evaluation of Australian institutions at the level of countries.

Methodology

We use the methodology described in the Research Impact Evaluation System² to assign research outputs identified by Crossref DOIs to institutions, and use Research Organisation Registry data to link institutions to countries. This provides a dataset of output-country links. Using data from OpenAlex, OpenCitations and Crossref we determine the number of citations for each output. The year of publication is taken from the Crossref issued_date field.

Each output is assigned to one or more FoRs based on the ERA23 Journal List. This is therefore a journal level assignment. This means that the analysis is precisely equivalent to the procedure described for calculating ERA23 benchmarks, such as dynamic RCI categories. For the performance analysis, we apply the same classification approach. This means that outputs in journals that are not assigned to an FoR (multidisciplinary journals) are not included in the performance analysis.

In this analysis, we calculate overall volume of outputs and citation counts at both country and country-FoR level as volume measures. We report average citations per output, average output citations as a proportion of RCI and percentage of outputs above RCI at country and country-FoR level. We use ranks based on these measures for simplicity in many cases and to compare to input measures such as GERD and GBARD. In some cases, we report median ranks as a form of subject normalised aggregate performance measure.

Australia's research volume

The dataset captures a steadily rising volume of quality research outputs that can be assigned to Australian institutions (rising from ~40,000 in 2011 to ~95,000 in 2021). Australia ranks globally ranks between 8th and 10th overall for research volume over the past ten years. In terms of citation volume, Australia also shows an improving trend in rank position over the past ten years. Compared to Australia's position of 32nd when ranked by Gross Domestic Expenditure on R&D (GERD) expressed as a percentage of GDP, these ranks are very high.

There is a global trend of increasing volume of outputs and citations which inflates a wide range of popular measures (including the various field weighted citation indicators, journal impact factors and variations on h-indices). The trend in Australia's ranking position is stable for output volume and slightly rising for citations. Australia's peers in volume rankings are Canada, Germany, Italy, Brazil and South Korea, with India rising through this group to a position of 4th by output volume and 9th by citations volume in 2021.

² <u>Automating ERA Benchmarks: An on-demand pilot system for calculating ERA-like benchmarks using open data and transparent analysis | Zenodo</u>

Australia's OECD rank by output, citations and research expenditure



Figure 1. Australia outperforms in terms of output volume and citations compared to national investment in R&D for OECD members reporting research expenditure. Australia's relative ranking position (2020) based on output volume, citation count and Gross Domestic Research Expenditure (GERD) as a proportion of GDP (2019) and Government Budget Allocations for R&D (GBARD, 2019). Australia's global rank is one lower (due to the inclusion of China), but substantially lower on the economic input measures (32nd for GERD and 17th or lower on GBARD – the position is uncertain as relatively few countries report on GBARD).

Australia's research quality performance

Australia ranks 9th on overall average citations per output amongst nations producing more than 30,000 outputs a year (8th for OECD members as China is not a member), and this position has been stable over the past decade. Australia also has a strength across a diversity of ANZUS fields of research with a median rank by volume in 2021 of 6th (across those FoRs with more than 200 outputs). The fact that Australia's overall citation volume rank is higher than its output volume rank also points to the quality of Australian research outputs overall.

As an example, the 31-Biological Sciences two-digit FoR classification Australia has maintained a position between 5th and 7th for average citations per paper over the past decade, amongst those countries producing more than 10,000 outputs per analysis period. Across all disciplines, Australia outperforms the global average of citations per paper across 149 of the 159 FoRs generating more than 200 outputs per year.

Australia's OECD rank by average citations per paper

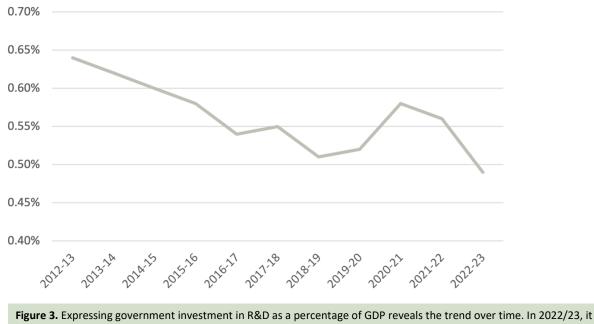
Rank	2013	2014	2015	2016	2017	2018	2019	2020
1	United Kingdom	Netherlands						
2	Sweden	Sweden	United Kingdom	United Kingdom	United Kingdom	United Kingdom	United Kingdom	United Kingdom
3	Germany	United Kingdom	Sweden	Sweden	Sweden	Switzerland	Belgium	Belgium
4	France	Germany	Germany	Switzerland	Switzerland	Belgium	Switzerland	Denmark
5	Australia	France	France	Australia	Germany	Sweden	Sweden	Switzerland
6	United States	Australia	Australia	Germany	Australia	Australia	Australia	Sweden
7	Canada	United States	United States	France	France	Germany	Germany	Australia
8	Spain	Canada	Italy	United States	United States	France	France	Germany
9	Italy	Spain	Spain	Canada	Canada	United States	Italy	Italy

Figure 2. Australia maintains performance over time despite greater competition. Australia's rank by average citations per paper in the 31-Biologicial Science FoR Code 2013-2020 (three year windows, countries producing over 10,000 outputs in this FoR per analysis period).

Australia's government support for research

Australia's research quality has remained relatively steady despite diminishing government allocation of budget towards R&D.

The Federal Government's most recent Science, Research and Innovation (SRI) Budget Tables, published in April 2023, indicate the government invested AUD\$12.1 billion in R&D in 2022/23. This equates to 0.49% of GDP – the lowest level since the data series began in 1978.



Australian government budget for research as % of GDP, 2012-2023

Figure 3. Expressing government investment in R&D as a percentage of GDP reveals the trend over time. In 2022/23, it reached its lowest level since the data series began. Source: <u>Australian Government SRI budget tables 2022/23</u>.

The data reflects government investment in R&D across all sectors, not just the university sector. In the 2022/23 financial year, the higher education sector received only 32% of the government's \$12.1 billion R&D budget (approximately \$3.9 billion).

Australian government investment in R&D by sector, 2022/23

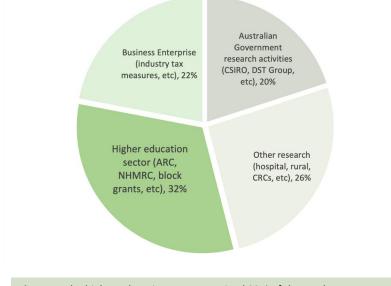


Figure 4. The higher education sector received 32% of the total government investment in in research in 2022/23. Source: <u>Australian Government SRI budget tables 2022/23</u>.