RESPONSE TO AUSTRALIAN UNIVERSITIES ACCORD INTERIM REPORT

1 September 2023

University of the Sunshine Coast

usc.edu.au

Contents

Introduction

The University of the Sunshine Coast (UniSC) is pleased to provide a submission in response to the *Australian Universities Accord: Interim Report* (Interim Report).

UniSC endorses the submissions made by our two industry peak bodies, Universities Australia (UA) and the Regional Universities Network (RUN). Our submission therefore seeks to provide additional perspectives and ideas for consideration.

Our submission is structured as follows:

1. UniSC's position on the Interim Report's Immediate Actions
2. UniSC's position on the Interim Report's Considerations for Change
3. Attachments
    a. Additional priorities for consideration in the Final Report
    b. Reimagining existing regional campuses

We would welcome the opportunity to discuss any aspect of our submission. If this is of interest, please contact Jason Mills, Head of Government Relations, on jmills3@usc.edu.au ▮▮▮▮▮▮▮▮

1. Position on Interim Report Immediate Actions

UniSC is broadly supportive of the immediate actions.

Priority Action 1: UniSC would welcome the creation of one or more Regional Study Hubs in Southeast Queensland. We also see value in the new Suburban Study Hubs, subject to further scoping discussions, and based on the Government's commitment that these new Hubs are located in areas without a significant physical university campus i.e. it is important they do not duplicate the public investment already made to create student access opportunities at existing peri-urban campuses. Relatedly, and consistent with UniSC's submission in response to the Accord Discussion Paper, we believe there is a real opportunity for Government to collaborate with and incentivise universities, other education and training providers and local communities to progressively reimagine existing regional campuses to deliver enhanced *tertiary* education accessibility, support, and outcomes for all regional students. Refer Attachment B for further detail.

Priority Action 2: With respect to the cessation of the 50% pass rule, the 'Support for Students Policy' must minimise additional institutional reporting given most universities already have robust academic policies and procedures for monitoring and supporting student progression.

Priority Action 3: Consistent with our previous submission, while we support demand driven funding being extended to all Indigenous students, to achieve the Interim Report's forecast increases in participation rates over the coming decades, UniSC believes this policy should also apply to all regionally based universities as well as other priority equity groups.

Priority Action 4: We welcome the extension of the Higher Education Continuity Guarantee for a further two years. However, to ensure additional student benefits are felt as quickly as possible, institutions should be able to apply any excess funding to existing supports, rather than having to create additional programs and services. Reporting should leverage existing arrangements.

Priority Action 5: UniSC accepts that we, and other universities, must continue to improve the way student and staff safety is proactively and reactively managed, including by ensuring that students and staff are at the centre of decisions being made that affect them. We similarly believe that effective institutional governance requires regular review and reform to ensure universities have contemporary, best practice frameworks, systems and processes, informed by a broad range of governing expertise across higher education, business, community, staff and students. Consistent with our previous submission, we believe the governance agenda should also focus on tertiary education legislation and regulation harmonisation opportunities with the objective of streamlining / reducing the sector's already burdensome and complex governance and reporting obligations.

2. Position on Considerations for Change

UniSC is broadly supportive of the intent of most of the areas for further consideration in the Interim Report. Therefore, this section focuses on those ideas where we have a particular perspective.

2.1 Evolving the mission for higher education

Focus area	UniSC perspective
A. Putting First Nations at heart of Australia's HE system	Further clarity on operationalising some these considerations is required, however we particularly support consideration A(d) as the commitment to First Nations people needs to extend beyond student participation to building research capacity and respecting Indigenous ways of knowing.
B. More students enrolled in HE, a fair system that ensures access and attainment, and a larger system that better meets national jobs and skills needs	Medium and long-term targets provide a mandate and motivation for governments to establish the policy settings and funding commitments to attempt to meet those targets. New targets must be realistic, emphasise attainment and be sufficiently nuanced if they are to address the problems we are trying to solve. They must also drive additional students to the sector and not inadvertently incentivise institutions to poach existing students from other institutions to meet their own targets. We support in principle a universal learning entitlement, including all students from equity cohorts being eligible for a funded place, underpinned by robust student support policies and funding that recognise the cost of supporting equity students who increasingly present with more than one form of disadvantage. Funded places must include bridging and sub-bachelor programs.
C. Meeting Australia's future skills needs	A more integrated tertiary education system will not occur at speed or scale without greater harmonisation (underpinned by AQF reform and improved RPL mechanisms), clearer articulation pathways and incentivised opportunities to co-locate and/or partner with other providers. CSPs provided to the TAFE sector should minimise artificial and unnecessary competition (and student confusion) for similar offerings by universities. We strongly support improved Work Integrated Learning (WIL) and placements, including by providing students with more financial support. However, institutional productivity and cost efficiencies should also be prioritised by improving coordination of placements, particularly in health and education.
D. Equity in participation, access and opportunity	The greatest gains and return on investment will come from focusing effort on regional Australia and equity cohorts with lower participation and attainment. The Government must continue to support institutional autonomy to offer higher education admission pathways tailored to local needs, as a lever to raise participation rates, particularly for mature age students and equity groups. We appreciate the recognition that reformed and increased institutional and student support will be needed to ensure that all students, but particularly those from equity groups, have a successful experience.
E. Excellence in learning, teaching and student experience	We would particularly welcome opportunities to promote collaboration and shared best practice in learning and teaching and provide for appropriate teaching infrastructure.
F. Fostering international engagement	We consider that creating a sustainable and globally connected international education sector is already central to the mission of most institutions. Regarding F(c), we support the Government's recently announced changes to Australia's visa settings. The Government should also consider a market entry seed funding initiative to support smaller regional universities to increase their transnational education offerings.
G. Serving our communities	We support the creation of stronger links between industry and education, particularly in regional areas and areas of low participation and attainment.

Focus area	UniSC perspective
H. Research, innovation and research training	We support the importance of more fully funding research, potentially achieving this over the next five years, as well as increasing Higher Degree by Research student stipends.

The Government needs to address the disproportionate allocation of research funding (and hence researchers and infrastructure) to large metropolitan universities at the expense of regional communities and further assist regional universities and SMEs to collaborate and innovate. The Government should also consider how to fund shared research and innovation infrastructure in regional Australia, including at regional universities.

We do not believe establishing a target number of PhD candidates employed in industry is the key problem to solve. A more effective intervention may be incentivising industry to offer more PhD scholarships via co-investments and funding for research infrastructure. |

2.2 Creating the foundations of a high functioning national system

Focus area	UniSC perspective
A. A coherent national tertiary system	We support further scoping and benefit analysis of a Tertiary Education Commission on the basis that over time it should be a true 'tertiary' commission based on a clear, nationally agreed, roadmap and timeframe.

We remain of the view that regional communities and industry both want and need comprehensive regional university offerings across teaching and research. Specialist institutions may succeed in the cities where there is greater demand and choice of providers, but most will not be appropriate for regional communities who already lack access to the same breadth of services and infrastructure. However, the Government should encourage and incentivise new models of delivery and collaboration to increase tertiary education and research in regional and under-serviced areas. We would welcome engaging with the Government on appropriate models that can further enhance and extend the impact of regional universities.

We do not believe the case has yet been made for pursuing a National Regional University. Instead, we contend that there are opportunities to address some of the longstanding challenges by a mixture of new policies and funding models that better support regional universities and identifying place-based solutions that reimagine existing regional university campuses where it makes sense to do so. Refer Attachment B for further detail. |
| B. Sustainable funding and financing | We support the need to redesign the current funding system, including a shift to a student centred, needs based model, a reduction in cross-subsidisation and better provision for teaching and research infrastructure investment and maintenance.

We particularly welcome acknowledgement of the higher cost of delivery that regional universities face and support investigating the idea of additional mission-based loadings that better reflect an institution's location and student profile.

A key facet of the new model for regional universities should be funding student support services on a student headcount basis rather than the current EFTSL approach. |

Attachment A – Additional priorities for consideration in the Final Report

While the majority of UniSC's arguments and recommendations from our submission in response to the Accord Discussion Paper are in some way reflected in the Interim Report, we believe the following ideas have not been captured and are worthy of further consideration by the Panel.

1. The perverse outcomes for regional universities like UniSC from the Government's continued (and inconsistent) use of geographical boundaries when determining stakeholder eligibility criteria for funding programs. A recent example is the Government's new Precincts and Partnerships Program which includes the City of the Gold Coast as an eligible Local Government Area (LGA) yet excludes the Moreton Bay LGA north of Brisbane. This blunt use of ABS derived geographical and population classifications means that peri-urban regions such as Moreton Bay, and often the Sunshine Coast, are unable to seek much needed funding under key Government programs despite many of their communities sharing the same challenges that the funding program is trying to address. UniSC recommends that the Government considers and introduces more nuanced definitions of eligibility, potentially instead of or at least in addition to, geographical boundaries for relevant education, research and infrastructure funding programs.

2. The Government should re-establish a dedicated higher education infrastructure program, with a set allocation for regional universities, for both capital and operational infrastructure costs as well as provision for rapidly increasing digital infrastructure costs such as cyber security.

3. As part of the governance agenda, the Australian Government and state and territory governments, in consultation with the sector and other relevant stakeholders, should consider tertiary education governance and regulation harmonisation opportunities, commencing with a risk-proportionate regulatory impact assessment (also noted in Section 1 of this submission).

4. The Government should partner with state and territory governments to develop a comprehensive and ongoing campaign to employer groups on the process for hiring international students, including financial incentives for businesses to take on international graduates in skill shortage occupations as well as in regional locations.

5. The Government should consider options to enhance existing, and support new programs aimed at increasing graduate employment outcomes for equity group and international students.

Attachment B – Reimagining existing regional campuses

As has been well argued and now acknowledged in the Accord Interim Report, regional universities continue to face diseconomies of scale and higher operating costs, leading in some cases to the need to cross-subsidise loss-making regional campuses in an effort to maintain access to higher education for regional students. Previous solutions to reshape and fully resource the delivery of critically important tertiary education in the regions have hardly advanced, despite recommendations from the Bradley and Napthine reviews.

This lack of focus and differentiated funding models for regional tertiary education has resulted in some regional universities continuing to be challenged to serve the regions in which they operate and unable to sufficiently invest to meet or drive higher education growth in key locations or areas of workforce need. This has also led to campus closures and transfers between universities, with little consideration of the needs of impacted students, industry and communities.

Economic impact studies consistently demonstrate the contribution that regional campuses make to their local communities, and therefore efforts to achieve economies of scale would need to thoroughly understand where those economies could be best achieved without damaging the community ecosystems in which these campuses operate. Local communities should be front and centre when it comes to any remodelling of tertiary education provision in their areas. The political, economic and social landscape of regional university campuses is complex and the real cost of delivering education in regional areas has never been fully understood.

Nevertheless, there are opportunities to address some of these longstanding challenges by identifying place-based solutions to reimagine existing regional university campuses, or components of them (where it makes sense to do so) to meet the future workforce needs in that region. A more holistic regional tertiary education and training model that incorporates universities, schools, vocational education and training providers such as TAFEs as well as other industry and community-based providers could be explored, reflecting a model proposed by Kwong Lee Dow in 2011 for the Gippsland region of Victoria[1]. This vision is being partially brought to life at the Gippsland Education Precinct, located on Federation University's Gippsland Campus in the town of Churchill[2]. Another example includes Western Sydney University's Maldhan Ngurr Ngurra Lithgow Transformation Hub at its Lithgow campus[3]. This kind of place-based approach would identify selected regional campuses with the potential to enhance economies of scale through partnerships and co-location, while also improving access, participation, support and choice.

For example, the Australian Government could, in collaboration with state and territory governments, incentivise universities to more strategically partner (potentially co-locate) at existing regional campuses with the goal of extending program offerings or load sharing and the sharing of infrastructure, facilities and employees to achieve efficiencies. Where appropriate, as is already the case in a limited way at some locations, including two of UniSC's campuses, these integrated tertiary education precincts could include TAFE or other vocational and education providers, schools, community education providers, industry, research hubs and other relevant community infrastructure. Consistent with the ethos of regional university centres, these integrated tertiary educations precincts would be accessible to any regional tertiary education student, including students of providers who are not partnered on the precinct. UniSC is already introducing one feature of the above model at our campuses by offering access to study spaces and our libraries for any local student who may be studying at another university.

[1] https://www.voced.edu.au/content/ngv%3A53516
[2] https://www.studymelbourne.vic.gov.au/choose-melbourne/study-in-a-regional-city/study-and-live-in-gippsland
[3] https://www.westernsydney.edu.au/newscentre/news_centre/story_archive/2021/western_sydney_university_transformation_hub_now_open_for_the_people_of_lithgow

Of course, regional universities and other regional tertiary education providers would need to be incentivised to establish a model such as this, i.e. to be less competitive and more collaborative. For the regional universities this could include additional CSPs, funding support for improved technology-enabled learning environments and other required infrastructure upgrades, scholarships for improved VET pathways and so on. Australian Government funding programs such as the Precincts and Partnerships Programs could be leveraged to underwrite some of the infrastructure aspects of the model.

If the Accord Panel and the Australian Government is interested in exploring this idea further, UniSC would be pleased to be involved in further scoping discussions, including any resulting pilot projects to test the business case.