

**Professor Steve Chapman**  
**Vice-Chancellor**

JOONDALUP CAMPUS

270 Joondalup Drive, Joondalup  
Western Australia 6027  
☎ 134 328

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[www.ecu.edu.au](http://www.ecu.edu.au)

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Professor Mary O’Kane, AC  
Chair, Australian Universities Accord Panel  
[accordsubmissions@education.gov.au](mailto:accordsubmissions@education.gov.au)

## **Response to the Accord Interim Report**

### **Submission from Edith Cowan University**

Edith Cowan University welcomes the opportunity to provide further comments on the considerations for change described in the Interim Report. As suggested, this submission focuses on three ‘reflections’ and provides additional detail which we hope might inform the recommendations for the Final Report, and their implementation.

#### **Further information**

If you require further information or clarification on details in this submission, please contact Professor Arshad Omari, Senior Deputy Vice-Chancellor by email: [a.omari@ecu.edu.au](mailto:a.omari@ecu.edu.au) or by telephone: (08) 6304 2526.

Yours sincerely



Professor Steve Chapman CBE  
Vice-Chancellor

## Response to the Accord Interim Report Submission from Edith Cowan University

### ECU'S KEY REFLECTIONS

**REFLECTION 1:** Universities need funding certainty and safeguards that protect their autonomy, limit administrative burden, and encourage responsiveness and differentiation.

We need mission-based compacts that have real meaning and application. Through new five-year compact-funding agreements, each university would be contracted to deliver local and national outcomes, in distinctive ways, consistent with their strategic plans. In return, the Federal Government would provide a consolidated single grant, including core funding for teaching and research and supplementary funding that recognises differences such as costs of delivery, student profiles and location demographics and supports the continued differentiation of individual universities within the university system. A central principle for establishing a suite of compact-funding agreements would be that *no two compact-funding agreements would look the same*.

**ECU recommends** that the Accord Panel engages with representatives from Universities Australia and the Australian Network of University Planners, to develop the principles for establishing new five-year compact-funding agreements that detail agreed outcomes and an 'overall funding envelope' to replace the current multiple grant programs.

**REFLECTION 2:** A Tertiary Education Commission would give effect to a national strategy for tertiary education.

ECU supports the Accord Panel's proposal for a Tertiary Education Commission. It must be given a distinctive role that takes on responsibilities ceded by the Department of Education, the Minister's Office, TEQSA, and the range of other government agencies with which universities engage.

It would exist to execute a coherent and consistent long-term strategy for tertiary education in Australia and must extend beyond the university system to include all higher education providers and vocational education and training providers, including TAFEs.

The Tertiary Education Commission would provide independent, evidence-based advice on the tertiary education system to Government, Parliament, and the public. It would be responsible for allocation of Government funding to providers, monitoring and reporting performance of institutions and the system as a whole, and ensuring that providers meet common standards in tertiary education governance and quality.

**ECU recommends** that the Accord Panel develops detailed proposals for a Tertiary Education Commission, responsible for executing a national strategy for tertiary education. Initially, its core functions would be to: 1) agree compact-funding agreements with universities and monitor and advise Government on the achievement of national priorities; and 2) ensure that common standards relating to governance, quality, performance, sustainability, and well-being are adhered to.

**REFLECTION 3:** We need a national approach for enabling programs to ‘turn the dial’ on access for people from groups currently under-represented in higher education.

Enabling courses have a demonstrated track record of expanding access for students from under-represented groups and setting them up for success in higher education. However, enabling courses sit outside the Australian Qualifications Framework, are varied and often provide access to a specific bachelor course, or a limited number of bachelor courses, offered by a specific provider. A nationally recognised *University Certificate in Higher Education* would provide access to most undergraduate programs at a student’s choice of university, irrespective of where (or when) the enabling course was undertaken.

We also need to consider more broadly how pathways to tertiary education might be improved, including through support for nationally-recognised collaborations between universities and the secondary school sector.

**ECU recommends** that the Accord Panel establishes a working group of lead academics in enabling programs to consider new national approaches to enabling pathways and a nationally recognised AQF qualification, the *University Certificate in Higher Education*. This working group, together with experts from the secondary education sector, would also examine how a national ‘university preparation in schools’ scheme might be supported.

Further details on ECU’s key reflections are at Appendix 1.

## AREAS OF SUBSTANTIVE AGREEMENT

- The Accord Panel’s recognition that **sustainability in university research funding** is needed.
- The need for incentives, including increased PhD stipend rates for domestic candidates, to increase the **Australian research workforce**.
- Measures to **improve access and success for people from under-represented groups** that have potential for significant positive impacts on higher education participation. These could include: a suite of financial support arrangements for students experiencing financial hardship; incentives for providers to develop new courses structures and delivery approaches that appeal to part-time and mature-age learners in particular; a Federal Government scheme of support payments for all students undertaking work placements; and additional funding to support the increasing number of students with disability in the university system.
- The need to **define and recognise skills developed through higher education** in a contemporary way that has meaning for graduates and employers.

## AREAS OF SUBSTANTIVE DISAGREEMENT

- The proposed **levy on international student fee income** would be an interference in the autonomy of universities and has the potential to negatively impact Australia’s market share in this important export industry. **ECU recommends** that the proposal for a levy on international student fee income receives no further consideration by the Accord Panel.
- The suggested **target of population parity** in participation by 2035 seems unrealistic. The Australian Universities Accord needs to articulate aspirations attached to targets that all of us – governments, industry-groups, universities, and the public – can believe in. **ECU recommends** that the Accord Panel gives consideration to a suite of aspirational, but realistic, targets for the short, medium and long-term.

**Accord Panel immediate actions** - ECU has some key concerns:

- A program for **University Study Hubs** based on the current funding mechanism for the Regional University Centres will deliver only limited benefits. A new and bold approach is needed to support improved university participation by regional and peri-urban communities, based on *equivalence in learning experiences*. **ECU recommends** that the Accord Panel convenes a working group comprising representatives from regional universities, outer-metropolitan universities and Regional University Centres, to redesign this funding program and to consider university ownership of the University Study Hubs.
- The draft legislation for the removal of the 50 per cent pass rule includes requirements for universities to have a **support for students policy** prescribed by the Higher Education Provider Guidelines, with additional reporting obligations and penalties for non-compliance. The imposition of further compliance obligations and the duplication of roles for TEQSA and the Department in this regard, is unwelcome. **ECU recommends** that the Accord Panel engages with the Department as a matter of urgency, with the objective of ensuring that duplication in compliance oversight and additional administrative burden is avoided.
- Extending **demand driven places for enrolment of First Nations people** is a supply-side measure that is unlikely to have a significant impact. Innovative demand-side approaches are needed to incentivise prospective students and to overcome significant barriers to access for First Nations people. **ECU recommends** that the Accord Panel considers incentives to improve student demand and which support success and completion, as well as access and participation, for First Nations people.
- The inclusion of a proviso that **funding from the Higher Education Continuity Guarantee** should be directed to support greater equity outcomes, needs to be achieved without additional reporting burdens and resource allocation away from core activities. It is unclear how this measure could have significant impact given the short timeframe of the HECG. **ECU recommends** that the Accord Panel considers working with the Department of Education to ensure that no additional administrative burden is incurred by universities in the use of the Higher Education Continuity Guarantee.

Further details on ECU's areas of substantive agreement and disagreement are at Appendix 2.

## MEASURES OF SUCCESS

ECU believes that the measures of overall success of the university system in achieving the Accord outcomes, and the contribution of individual universities to this, should be based on a small set of high-level indicators that measure the societal impact of universities.

The ability to drilldown for particular cohorts, regions, states, or industry segments, will ensure that the university system measures have additional value. Once the metrics have been agreed, institutional targets that are normalised for a university's distinct student cohort and reference rates in the population will need to be negotiated with universities as part of their compact-funding agreements.

**ECU recommends** that the Accord Panel engages with the Treasury Department, Jobs and Skills Australia and the fledgling Tertiary Education Commission to formulate a set of high-level performance measures that relate to the Accord aspirations, to measure the progress of the sector as a whole, and of individual universities, in future years.

Further details on ECU's proposed measures of success are at Appendix 3.

## APPENDIX 1. THREE BIGGEST REFLECTIONS

### REFLECTION 1:

**Universities need funding certainty and safeguards that protect their autonomy, limit administrative burden, and encourage responsiveness and differentiation.**

At its most fundamental, the Australian Universities Accord will provide a roadmap to increase the contribution of the Australian university system to the Nation's human capital and societal advancement. There is, however, an inherent tension between the pursuit of co-ordinated, whole-of-system strategies, and the need to ensure the continued autonomy, responsiveness, and distinctiveness of individual universities.

We need mission-based compacts that have real meaning and application. Necessarily the compacts would incorporate funding agreements, so that for a five-year period, each university is contracted to deliver local and national outcomes, for which Federal Government would provide a consolidated single grant – an 'overall funding envelope' (see below). Compact-funding agreements might also describe the universities' contributions to priorities agreed with state governments and industry partners.

Central to the elevated role of the compact-funding agreement would be to ensure that the individual agreements align to the strategic plans of each university and that *no two agreements look the same*. The distinctiveness of individual universities must be maintained to ensure that the university system remains responsive and offers real choice to prospective students and industry partners, across a comprehensive range of teaching and research disciplines. Diversification cannot be imposed on the university system, but individual universities should be encouraged to be responsive to local demand, and to state and national priorities through individual approaches. These activities would be supported by a core funding grant for teaching and research, with supplementary funding that recognises university differences such as costs of delivery, student profiles and location demographics. This approach will effectively support the continued differentiation of the university system.

The reference above, to an 'overall funding envelope' is also a plea for consolidation of government funding programs to reduce the administrative burden associated with detailed application, acquittal, and reporting processes for multiple pools of funding. The number of grant programs has grown in recent years and proliferated with the *Job-ready Graduates* Program. Grant programs currently include performance-based funding, the National Priorities and Industry Linkage Fund (NPILF), the Higher Education Participation and Partnerships Program (HEPPP), the National Priorities Pool Program (NPPP), the Regional Partnerships Project Pool Program (RPPPP), Demand Driven Places, Equity Places, Short Courses places, Regional Loading, Enabling Loading, Medical Loading, Regional Universities Centre places, campus remoteness growth factors, Research Training Program, Research Support Program, the Indigenous Student Success Program (ISSP), and the Higher Education Disability Support Program (DSP). The complicated administration associated with these funds diverts resources from teaching and research, and their short allocation and acquittal timeframes (typically annual), inhibit their application to longer-term strategies.

**ECU recommends that the Accord Panel engages with representatives from Universities Australia and the Australian Network of University Planners, to develop the principles for establishing new five-year compact-funding agreements that detail agreed outcomes and an 'overall funding envelope' to replace the current multiple grant programs.**

## REFLECTION 2:

### **A Tertiary Education Commission would give effect to a national strategy for tertiary education.**

ECU supports the Accord Panel's proposal for a Tertiary Education Commission. At the same time, we recognise that the composition of the Commission and its roles and responsibilities will be difficult to define. Importantly, it must be given a *distinctive* role that takes on responsibilities currently with the Department of Education, the Minister's Office, and the range of government agencies with which universities engage (such as the Australian Charity and Not-for-profit Commission, the National Indigenous Australians Agency, the Department of Employment and Workplace Relations, and TEQSA). Universities would not wish to deal with a Commission that duplicates bureaucracy: these agencies must cede some existing functions to the Commission.

The Tertiary Education Commission would exist to execute a national strategy for tertiary education. Its role must extend beyond the university system to include all higher education providers and vocational education and training providers, including TAFEs. Its role would be continuous across the terms of governments, providing a coherent and consistent long-term strategy for tertiary education in Australia. As a semi-independent body it would provide evidence-based advice to Government, Parliament, and information to the public on the performance of the tertiary education system.

ECU proposes two core functions for a Tertiary Education Commission at inception. Firstly, it would be responsible for brokering agreements with each university (and later other providers) to deliver the set of compact-funding agreements, as described above. It would monitor and report performance of the university system against the agreed outcomes.

The Tertiary Education Commission's second core function would be to oversee the obligations of universities (and later other providers) in meeting common standards relating to governance, quality of the educational experience, performance and sustainability, and student and staff well-being, *where these matters are outside of the scope of regulatory oversight by TEQSA and ASQA*. Some of these have been set out in the Interim Report, including a national student charter and the composition of governing boards. Other standards might be incorporated, such as those currently set out in voluntary codes of practice under the University Chancellors Council. The Tertiary Education Commission would work with TEQSA and Universities Australia to ensure that these sector-wide 'baseline standards' are adhered to by all universities.

Since these common standards would be *required of all providers*, irrespective of local priorities or the strategies of individual institutions, they *should not* be included in compact-funding agreements. The current mission-based compacts have been less valuable because of requirements to commit to, and report on, simple principles of operation such as academic freedom and freedom of expression on university campuses.

In time, the Tertiary Education Commission would also provide a conduit to improved coherence in tertiary education quality, regulation and standards, where currently this is fragmented. It would implement mechanisms to encourage collaboration and engagement in learning and teaching – in a similar way to the now defunct Office of Learning and Teaching – and would provide for better co-operation and efficiencies in tertiary education providers' interactions with TEQSA, ASQA, government agencies and professional accreditation bodies.

**ECU recommends that the Accord Panel develops detailed proposals for a Tertiary Education Commission, responsible for executing a national strategy for tertiary education. Initially, its core functions would be to: 1) agree compact-funding agreements with universities and monitor and advise Government on the achievement of national priorities; and 2) ensure that common standards relating to governance, quality, performance, sustainability, and well-being are adhered to.**

### REFLECTION 3:

**We need a national approach for enabling programs to ‘turn the dial’ on access for people from groups currently under-represented in higher education.**

The Australian Universities Accord has a core objective to create an inclusive knowledge economy where individuals of all backgrounds reap the personal benefits, and Australia the collective benefits, of growing human potential through education.

Enabling courses have a demonstrated track record of expanding access for students from under-represented groups and setting them up for success in higher education. Those who enter bachelor degree courses after successfully completing an enabling course, typically achieve *better* outcomes than those admitted via other sub-bachelor pathways. However, enabling courses are varied and often specific to a bachelor course, or small number of bachelor courses offered by a specific provider, limiting their portability between institutions.

Enabling courses are defined in the *Higher Education Support Act* as courses that grant entry to a higher education award course, so an enabling course cannot itself be a higher education award.

To improve access and participation for students from equity groups sufficiently to achieve parity rates, we need a national approach for enabling programs, with an AQF-level award for successful completion. A nationally recognised *University Certificate in Higher Education* would provide access to most undergraduate programs at a student’s choice of university, irrespective of where (or when) the enabling course was undertaken.

Those universities who have demonstrated best practice experience and expertise in enabling courses should be funded to design and deliver the national certificate award course.

Further, we know that some versions of enabling course programs, such as ECU’s *UniPrep Schools*, successfully provide a ‘bridge back’ into secondary schools where educational disadvantage perpetuates from earlier years. The Accord Panel and the Minister have recognised the importance of other reviews currently in-train relating to what is in effect an ‘education continuum’ and recognising that the university system cannot remedy all educational disadvantage established early in individuals’ lives. With this in mind, we need to explore more broadly how pathways to tertiary education might be improved for people from under-represented groups. This might include support for nationally-recognised collaborations between universities and the secondary school sector, based on models such as ECU’s *UniPrep Schools*.

**ECU recommends that the Accord Panel establishes a working group of lead academics in enabling programs to consider new national approaches to enabling pathways and a nationally recognised AQF qualification, the *University Certificate in Higher Education*. This working group, together with experts from the secondary education sector, would also examine how a national ‘university preparation in schools’ scheme might be supported.**

## APPENDIX 2. AREAS OF SUBSTANTIVE AGREEMENT OR DISAGREEMENT

There is much in the Interim Report that points to well-recognised areas for change, with which ECU agrees, such as improved research funding, improved equity access, and joined-up approaches to tertiary education. However, the Interim Report leaves much undefined, and significant work is now needed to develop the details of these proposals. Some ideas are outlined below.

**2.1 The Accord needs to address the long-term sustainability of research funding in Australia** and seek a firm commitment from Government to increase investment in university research. Currently research grants from different parts of government provide varying levels of compensation for the indirect costs of research and at different rates for lead universities compared to partner universities. A uniform method for meeting indirect research costs is needed, along with a commitment to increase this funding portion over time.

ECU supports the Accord's objective to "decrease the extent of cross-subsidisation throughout the system" (Interim Report p. 134) and to increase direct funding for research. Universities must undertake research, yet Government does not adequately fund research directly and not all universities have the same ability to cross-subsidise research undertakings from other sources of revenue.

Further, Australia's future research capability depends on a research workforce, and by extension, a university academic workforce, provided by a pipeline of Higher Degree by Research candidates. Increasing PhD stipend rates – without reducing the number of domestic candidates supported by scholarships – and increasing research funding sustainability, are key to enhancing attractiveness of research degrees to Australians.

**2.2 The Accord's focus on improved equity access is very welcome.** Possible measures to improve access and success for people from under-represented groups are well articulated in the Interim Report and this offers some encouragement that a second tranche of actions might be forthcoming in the near future. In particular, ECU offers substantive agreement for the following initiatives given that they have potential for significant positive impacts on higher education participation. Initiatives for improving equity group access and participation in the university system must also consider how these approaches can support stronger student outcomes and success.

**2.2.1 A suite of financial support arrangements for students experiencing financial hardship** could include HELP rebates, scholarships, and bursaries. More radical, targeted support could be considered for Aboriginal and Torres Strait Islander students and others to 'turbo-boost' access and success. Initiatives could include forgiveness of HELP debts (for those not completing), and zero student contributions for First Nations students entering university for the first time.

Whatever financial support measures are introduced (Interim Report p. 66), crucially these must be widely promoted, easily understood, simple to access, and enduring.

**2.2.2 Revised course structures and delivery approaches that appeal to part-time and mature-age students,** need further consideration. Cost of living pressures and the demands of part-time work and other responsibilities prevent many students from undertaking or persisting with study. A three-year full-time undertaking is not viable for many. Volume of learning is a challenge, and universities may wish to explore ways to move towards outcomes-based assessment. Funding may be needed for those universities with a strong focus on part-time and mature-age undergraduate learner cohorts, to incentivise better scaffolding of courses and more options for early exit awards. Importantly, greater flexibility around attrition measures may be needed so that those universities with these course options are not treated as 'poor performers' on retention and completion measures.



**2.2.3 A Federal Government scheme of support payments for all students undertaking work placements of a certain length, mandatory placements, and placements in national priority disciplines** (Interim Report p. 51). Alternatively, placements could be incorporated into the *Fair Work Act*, rather than exempted, so students receive payment from employers.

**2.2.4 Additional funding to support the increasing number of students with disability in the university system**, and merging equity grant funding programs to allow flexibility for universities to achieve agreed targets for the equity group cohorts they wish to focus on (Interim Report p. 42).

**2.3 Defining and addressing skills needs in a tertiary education system** is the ‘spikiest’ of problems. The Interim Report notes that in time 50 per cent of new jobs will require a bachelor or higher degree. The National Skills Commission report: *State of Australia’s Skills 2021* cites a range of modelling that indicates higher order work capabilities will be needed in the context of increasing automation and Artificial Intelligence. The skills that will be most in demand cannot be developed merely in stackable chunks; they need deep learning, sustained and developed over time, across a cohesive set of experiences. Professional accreditation will also sustain the degree model in many disciplines. The university system cannot make decisions independently of the professions, and a collaborative approach is needed.

Micro-credentials will be of most value as an *add-on* to a three-year degree and other forms of award course, and for those wishing to upskill or re-skill. For that reason, we may begin to witness disruption to traditional course structures, to a greater extent at the postgraduate level than at undergraduate level. These disruptions will have implications for the way in which governments, employers and the tertiary education system define and recognise skill acquisition.

As the Interim Report notes, a national skills passport and common taxonomy across the tertiary sector is needed. The distinction between ‘vocational skills’ and ‘higher education skills’ needs to be addressed in whatever national skills framework is developed. Certainly, this may not be enough to ensure the wide set of graduate skills that employers want are reflected in tertiary level courses. Although addressed to some extent (Interim Report p. 45 and p. 55), it is unclear how skills beyond the technical, such as situational awareness, emotional intelligence and social intelligence, as well as other skills valued by employers, such as problem-solving, creativity, teamwork, self-awareness, adaptability, and communication, might be better supported by the tertiary education system.

The following comments relate to areas of **substantive disagreement** for ECU.

#### **2.4 A levy on international student fee income**

The Interim Report (p. 16 and later) suggests a levy on international student fee income, noting that, “Such a mechanism could provide insurance against future economic, policy or other shocks, or fund national and sector priorities such as infrastructure and research.” While accepting the Minister’s note of caution that Government cannot fund everything, the possible redirection of revenue, at the Minister’s discretion, from an additional tax on universities, would be most unwelcome.

Perversely, those universities with large international student numbers, and therefore those most exposed to financial risks through reduced international student demand, would contribute most to the new tax fund. As witnessed during the pandemic, regional universities with low international student enrolments were relatively financially stable. In any case, attempting to make provisions for unpredictable and potentially unprecedented economic disruptions seems futile.

The inference that universities are unable to manage their finances appropriately is false, and the interference of Government in the financial decision-making of universities would further erode reduce

university autonomy. It is hard to imagine that this sort of intervention would be tolerated by any other Australian industry sector.

Further, this measure has the potential to negatively impact Australia's market share in this important export industry. It would disincentivise international education activity by universities and make Australia a less attractive study destination for prospective international students who might object to the explicit subsidisation of other functions through their student fees.

It is worth noting that the Federal Government already receives significant revenues from international education, through the student visa application process and international students' tax contributions through employment. There may be scope to redirect revenue from existing taxes associated with international education to help fund the cited priorities.

**ECU recommends that the proposal for a levy on international student fee income receives no further consideration by the Accord Panel.**

## **2.5 Are targets for equity population parity too aspirational?**

The Interim Report (p. 9 and elsewhere) cites equity population parity in participation by 2035 as a 'system shift', but this seems unrealistic and perhaps even cursory. The Australian Universities Accord needs to articulate aspirations attached to targets that all of us – governments, industry-groups, universities, and the public – can believe in.

**ECU recommends that the Accord Panel gives consideration to a suite of aspirational, but realistic, targets for the short, medium and long-term.**

ECU provides more detailed comments on performance measurement later in this submission, under the Measures of Success heading.

## **2.6 The Accord Panel's immediate action items**

While these seem largely sensible measures and their acceptance by the Minister was initially viewed as a set of 'quick wins' for the higher education sector, these immediate actions may have either limited benefits, or unrealistic additional reporting obligations for universities.

### **2.6.1 Priority Action 1: University Study Hubs**

The Accord Panel's immediate action item to expand the Regional University Centres program, and to include outer-metropolitan areas for consideration, has been welcomed by most sector commentators. However, simply applying the current funding mechanism for the Regional University Centres program will deliver only limited benefits.

The Interim Report (p. 28) says "RUCs have been found to be effective at improving student participation, retention and completion rates in regional and remote areas..." although it is doubtful that there is strong evidence for this assertion. In its recent (June 2023) report on Access and Participation Programs for Regional and Remote Students, [the Australian National Audit Office](#) found that "The department [of Education] does not have a consolidated approach to consider...performance measurement, and evaluation mechanisms that support the achievement of access and participation for regional and remote outcomes." Put simply, the Department cannot rely on national student data collections for assessing student outcomes for those supported in their studies by the Regional University Centres.

The Department and the Accord Panel may have referred to the Cox Inall Ridgeway and Urbis 2021 evaluation of Regional University Centres, but as a one-off assessment, that does not provide for continuing or extensive monitoring.

The Department's process for selection of locations was lent legitimacy by the [scoping study report](#) by Deloitte Access Economics, 2021, but establishing locations for new University Study Hubs through a Departmental assessment process will again lead to accusations of political favouritism and deals with Senators.

A new and bold approach is needed to support improved university participation by regional and peri-urban communities and to deliver meaningful and measurable improvement in regional and peri-urban educational attainment. Central to this approach is *equivalence*. Without equivalence in course offerings, learning facilities and support services, students who live outside metropolitan areas will continue to have limited choice and inferior learning experiences and outcomes. Regional University Study Hubs need to be better resourced, and consideration needs to be given to integrating them into current universities, so that this equivalence in learning experience is achievable.

Clarity is required as to the role of the proposed National Regional University, but another approach might see the expanded network of University Study Hubs become campuses of the new National Regional University. Alternatively, the National Regional University could contract current universities to offer their course units online or onsite at the University Study Hub sites, as an *Open Universities Australia for the Regions* model.

Consideration could also be given to expanding the available infrastructure accessible to regional and peri-urban students, through local libraries and TAFE facilities. These spaces could be provided under contract to the National Regional University.

**ECU recommends that the Accord Panel convenes a working group comprising representatives from regional universities, outer-metropolitan universities and Regional University Centres, to redesign this funding program and to consider university ownership of the University Study Hubs.**

### **2.6.2 Priority Action 2: Ceasing the 50% pass rule**

ECU welcomes the abolition of the 50 per cent pass rule as it removes a punitive measure from the *Job-ready Graduates* package, which ECU evidenced as having a particularly adverse impact on enabling program students.

However, the draft legislation for this change includes requirements for universities to have a support for students policy that will be prescribed by the Higher Education Provider Guidelines, with additional reporting obligations and penalties for non-compliance.

ECU has a long-standing and enviable reputation for providing excellent educational experiences and for personalised support to help our students succeed. Even those universities with less focus on the student experience than ECU know that 'attrition is its own punishment' given its impact on revenues. Therefore fines are unnecessary and the imposition of further compliance obligations and the duplication of roles for TEQSA and the Department in this regard, is unwelcome.

**ECU recommends that the Accord Panel engages with the Department as a matter of urgency, with the objective of ensuring that duplication in compliance oversight and additional administrative burden is avoided.**

### **2.6.3 Priority Action 3: Demand-driven funding to universities for First Nations students**

While this seems an obvious improvement on the former restriction to those from regional areas, it is doubtful that universities have been unable to enrol suitably qualified Aboriginal and Torres Strait Islander students in undergraduate courses because of limited Commonwealth Supported Places. The problem is not a supply-side issue and the priority action will not have the impact needed. As a short-

term measure, the \$34 million funding support to universities would have been better directed through the Indigenous Student Support Program.

In addition, innovative demand-side approaches are needed to incentivise prospective students to drive access, and to overcome significant barriers to success and completion for First Nations people. Many ideas for incentives were raised in submissions to the Accord Panel Discussion Paper to drive demand and improved outcomes, and might include zero student contributions, and forgiveness of HELP debts, particularly for those who did not complete their course, financial support measures including scholarships to cover transport, accommodation and study material costs, and employer support for mature-age learners.

**ECU recommends that the Accord Panel considers incentives to improve student demand and which support success and completion, as well as access and participation, for First Nations people.**

#### **2.6.4 Priority Action 4: Reporting obligations around the Higher Education Continuity Guarantee**

While ECU welcomes the short-term stability provided by an extension of the Higher Education Continuity Guarantee for 2024 and 2025, it comes with the proviso that “...universities and providers should be expected to direct any funding resulting from this guarantee to support greater equity outcomes.” As this funding is provided to ensure that universities are able to maintain service provision during a further period of uncertainty, it is difficult to see why there is a need for further scrutiny of its application, or how this measure could have significant impact given the short timeframe of the HECG.

It is unclear how the Department would assess the quantum of any excess/surplus funding and how, under current reporting arrangements, universities could provide meaningful evidence of its direction to equity support. Devising a new reporting arrangement to assess this would be an additional administrative burden – one that universities undoubtedly would be expected to meet from their existing running cost budgets.

**ECU recommends that the Accord Panel considers working with the Department of Education to ensure that no additional administrative burden is incurred by universities in the use of the Higher Education Continuity Guarantee.**

### APPENDIX 3. MEASURES OF SUCCESS

Measures of success at the individual university level would be set down in the compact-funding agreements, as described earlier in this submission. The compact-funding agreement would articulate the local and national priorities to be addressed by a university, through initiatives appropriate to its strategic direction and location(s), in exchange for an 'overall funding envelope' within which the university would operate its teaching and research activities.

We should avoid compact-funding agreements, and the measures of success included, being tied to unrealistic achievement of improvement targets that are based on narrow and/or lagging performance metrics. The measures of overall success of the university system in achieving the Accord outcomes, and the contribution of individual universities to this, should be based on a small set of high-level indicators that measure the societal impact of the university system.

Universities have, over many years, sought ways to measure their contributions in broader terms than through traditional key performance indicators for teaching and research. There has been no guidance from the Department of Education or its predecessors, and co-ordinated reporting of performance ended when the Institutional Performance Portfolios Information Collection was discontinued in 2017. Some universities have commissioned professional services consultants to quantify the value of their institutions to their local community and the national economy, but whole-of system assessments have been infrequent.

The development of [the Times Higher Education Impact Rankings](#), based on the [United Nation's Sustainable Development Goals](#), was the response of a commercial organisation to a recognised demand from universities for a way of assessing and comparing the impact of universities on society and the environment.

[The Measuring What Matters Framework](#), developed by the Australian Government Treasury Department, might provide a useful way of identifying the contribution of the university system to the Nation's wellbeing, in particular its contribution to a prosperous Australia. The 12 dimensions and 50 key indicators across the themes of health, security, sustainability, cohesion, and prosperity, might provide useful metrics for measuring the societal, environmental, and economic contributions of the system, and individual universities, complemented by the Closing the Gap targets.

As the Framework website notes:

We will be looking for opportunities to embed the Framework into government decision making. This will involve guidance for agencies to inform policy development and evaluation. The Framework could also be used in areas of policy that require different levels of government to work together.

But the Framework's usefulness will extend beyond government. It has been specifically designed to be drawn upon by business, academia, and the community to support their efforts to create better lives for all Australians.

Measures that are utilitarian, and have most meaning for business and industry, are also required. As the Interim Report notes, an increasing proportion of the Australian workforce will require university qualifications. This is an obvious metric for robust monitoring and reporting, alongside a labour market analysis and skill demand model that, through Jobs and Skills Australia, would have universal application by universities, employers and policy makers at all levels of government. Research performance and research translation metrics are also required to measure the contribution of the university system to innovation in Australia.

Whatever the metrics chosen, the ability to drilldown for particular cohorts, regions, states, or industry segments, will ensure that the university system measures have additional value. Once the metrics have

been agreed, at the institutional level, targets that are normalised for a university's distinct student cohort and reference rates in the local population will need to be negotiated as part of their compact-funding agreements.

Consideration also needs to be given to broader definitions of equity students so that all those who have demonstrable educational disadvantage can be supported to improve both access and success.

**ECU recommends that the Accord Panel engages with the Treasury Department, Jobs and Skills Australia and the fledgling Tertiary Education Commission to formulate a set of high-level performance measures that relate to the Accord aspirations, to measure the progress of the sector as a whole, and of individual universities, in future years.**