



**A submission to Australian Universities Accord Panel in
response to the University Accord Interim report**

1st September 2023

Professor Stephen Fogarty - President
Associate Professor David Perry - Vice President Academic, Chair of IHEA
Nick Jensen - Director of Government Relations

Alphacrucis University College Submission

1st September 2023

Executive summary

Alphacrucis University College (AC) is pleased to present its submission on the Interim Report of the Australian University Accord. As the largest faith-based higher educational institution in Australia (on the Protestant side), and a dual-sector provider delivering both Higher Education (HE) and Vocational Education (VET) pathways, AC is highly invested in seeing a diverse, strong and aligned higher education system that is essential for forward progress.

We have considered the Interim Report and detailed specific responses to the recommendations provided, as well as identifying areas for development in the final report.

New Tertiary Study Hubs (p6, 28, 66, 106)

The Panel has recommended place-based and community-led solutions for improving the participation, retention and completion for students in regional, remote and outer metropolitan areas. AC has been a significant innovator in this sphere, utilising school cluster partnerships to form [Clinical Teaching Hubs](#) across over 50 regional school communities since 2018 with an 85% retention rate. We would therefore recommend any extension of New Tertiary Study Hubs by the Accord include serious consideration of funding for similar successful models.

Universal Learning Entitlement (p9, 43, 131)

AC welcomes the Interim Report's focus on a student-centred funding model, described as a Universal Learning Entitlement (ULE). This model affirms the notion that students can determine their own path without the influence of perverse funding incentives and is a much-needed reform. As an institution whose students have been detrimentally impacted by an outdated CSP system and ineligibility for Research block grants, despite our University College status, such a change supporting true student choice and access and equity goals is long overdue and should be implemented without further delay.

First Nation funding eligibility (p7-8, 26-28)

The issue of First Nation participation is an important one and AC supports collaboration and partnerships between First Nations communities, governments, higher education institutions and industry. The priority action of universal eligibility for funding places for First Nation students is welcome, but has neglected to include University Colleges in the arrangement (which would be of negligible cost). Being included is vital as a number of our regional Indigenous trainee teachers are currently being forced to pay \$60,000 for their degree - four times the cost of those in the large universities. Such funding would also kickstart a number of [Clinical Teaching Indigenous Hubs](#), a proposal which AC recently submitted to the Federal Budget process for consideration.

Sector Diversity and Faith-based institutions (p2, 14, 104-105)

AC applauds the Panel's emphasis on the importance and benefit of a wider range of complementary institutions differentiated by their unique missions. However, AC was disappointed that the Interim Report appeared to have no recognition or awareness of the existence and unique role of faith-based institutions - who in many ways embody the concept of mission-based and community driven higher education. We would hope that this omission is remedied in the final report, and wish to invite any members of the Accord panel to join us at the [Faith-based higher education summit](#) being sponsored by the Education Minister on October 30th this year to better understand this unique arm of the sector and its innovative work.

Community focussed mission-based compacts (p14, 85, 91, 104-105)

Community engagement should indeed be a central part of university (and University College) missions. The faith-based higher education sector leads the way in student satisfaction, student volunteer hours, service industry graduates, first in family students, and trusted local community partnerships¹ - and supports the use of community impact classification measurements. Recognition of, and support for, mission-based compacts would help demonstrate the alignment of higher education institutions with the communities they serve.

Provider Categories - University College (p106)

AC is surprised at the minimal consideration given in the report to the issue of provider categories. There was no mention of the issue of the legislative omission and lack of funding implications for the new University College category, despite assurances by the Department of Education at the [October 2022 Senate Estimates](#) that it would be addressed. Here we quote the First Assistant Secretary for Research:

Mr Dom English - You are correct that the university colleges are not currently eligible for research block grant support. This is a question that we do expect will be addressed as part of the Accord process. It is thinking about the right structure of offerings across the system and how the relatively new category, as you say, of university colleges should be supported to engage with the same opportunities, where relevant, as table A and table B Providers.

Instead of addressing this structural issue, the only factor discussed in the Interim Report was an implication that the new provider category standards, recently introduced after significant review with bipartisan support, was now '*preventing institutions from developing stronger identities and diversity*'. The Coaldrake review indicated that this was in fact a deliberate stiffening up of the requirements for registration as a university in terms of research, in part to highlight the difference between a university college and university in respect of the research requirement. This change created more diversity in the sector, as well as enabling a viable category for universities to build an identity and advantage as teaching-intensive or professions-focused.

A number of institutions have worked over several years and spent hundreds of thousands of dollars (including AC) in successfully attaining the new category of University College, and the omission of examination of the issue in the Interim Report is deeply disappointing. Moreover, students at these institutions are adversely affected by current arrangements with no firm prospect of relief. We would strongly urge the Panel to consult with University Colleges directly and address the role and Table A/B status of the University College category in the final report.

¹ [Economic Impact of Christian Higher Education | CCCU](#)

Industry alignment and VET (p48, 108-110, 114)

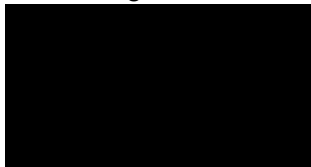
The Interim Report identifies the priority in addressing barriers that prevent VET and higher education working together, especially in courses and institutions that involve both sectors. As one of the only dual-sector university-level providers in NSW (along with Avondale University), AC holds that the current funding and regulatory settings are not industry aligned and stifle innovation. Our [Clinical Teaching Hubs](#) are an example of significant breakthrough for VETiS and Higher Education pathways that have been stifled by lack of Government support.

In addressing the Interim Report's recommendations, we would suggest that any extension of extending CSP's at some AQF levels should not just be limited to the TAFE sector, but other recognised dual-sector providers. Secondly, recognising and supporting existing strong models of RPL and experience training pathways (such as the school-based Clinical Hub model) in addition to the Cooperative Skills Centres focus. Lastly, the inclusion of recognised high-quality providers like AC in piloting self-accrediting for dual sector higher education providers.

AC wishes to thank the Panel for their significant work in the University Accord process. We would be more than happy to be involved in further stakeholder discussions as required.

For further detail or clarification, or to find out more information about the upcoming **Faith-based Higher Education Summit**, please contact our Director of Government Relations at nick.jensen@ac.edu.au or [REDACTED]

Warm regards



Professor Stephen Fogarty

President - Alphacrucis University College

