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Consultation Paper: Implementing Suburban University Study Hubs – Submission from Edith Cowan University

Edith Cowan University (ECU) welcomes the opportunity to provide input to the design of the funding program for Suburban University Study Hubs.

ECU is a large public university committed to providing high quality learning experiences and individualised student support. The University has more than 30,000 students, including First-in-Family learners, students from low socio-economic status backgrounds, students with disability and Aboriginal and Torres Strait Islander students. ECU has one of the largest enabling programs in Australia. The University's main campus is in a peri-urban location north of Perth, and it also operates the largest regional campus in Western Australia.

Responses to selected Consultation Paper questions are provided below.

The aims of the program

2. How can the Suburban University Study Hubs widen participation and support and extend further study opportunities?

The Suburban University Study Hubs can be considered to have three key functions.

Firstly, University Study Hubs should provide a visible **'shop front' for onsite study and careers information and advice** to prospective students. This would have value for communities that otherwise have little engagement with universities, or knowledge of opportunities for higher education study. Accordingly, local relevance based on community engagement is paramount.

Secondly, the University Study Hubs should provide for **delivery of enabling (university preparation) courses**. This would allow greater numbers of educationally disadvantaged people who aspire to university study, to gain the literacy, numeracy and learning skills necessary for access to higher education courses.

Thirdly, the University Study Hubs should provide **study and study support facilities** that would not be available to online learners in their own homes, or through local government run facilities such as libraries. These must be safe, contemporary, technology-enhanced facilities, with collaborative learning spaces for student peer networks, meeting places for professional networks and spaces for face-to-face access to learning advisers and academics. The support

services should provide wrap-around student services equivalent to those available to on-campus university students.

3. How can equity be embedded into the design of Suburban University Study Hubs?

The design of the Suburban University Study Hubs should follow the principle of *equivalence* in the learning experiences for students using the University Study Hub, compared to those studying on-campus at a university.

Without equivalence in learning facilities and support services, students who live outside metropolitan areas will continue to have limited choice and inferior learning experiences and outcomes.

It is vital that the program provides sufficient funding for each Suburban University Study Hub to undertake fit outs following Universal Design Principles for learning, to offer facilities that:

- provide a friendly, welcoming and accessible environment for diverse learners
- include flexible and multiple-use spaces for collaborative learning and private conversations, and
- offer genuine inclusivity and accessibility for students with disability and differing needs.

Common design elements, that should be present in all University Study Hubs, include:

- a room for private appointments with learning advisors, academics and equity support officers
- provision of assistive technology, such as speech-to-text software
- good wayfinding signage
- a safe and secure environment for all users of the facilities.

To further align with the needs of students from equity groups, when assessing applications for potential sites, preference should be given to proposed University Study Hubs that can be reached using public transport, offer, or are close to childcare facilities, and that extended opening hours, including evenings and weekends.

Barriers addressed and services provided

10. How can Suburban University Study Hubs best communicate the supports they provide to local students and support aspirations in their local community?

There is an important role for the Australian Government, as the funding body for this program, in raising awareness and building community engagement for the University Study Hub network. Promotional material commissioned by the Department of Education, and co-designed with a representative group of community organisations, would be provided to each University Study Hub. This would signal the importance of the Program at the national level, and would provide consistent communications for all University Study Hub sites.

This would be supplemented with promotions and messaging that is locally-relevant and undertaken by the operators of each University Study Hub. In practice, the promotional materials and communication approaches would be developed and supplied by the participating universities (see answer below to Q15.).

11. What role could Suburban University Study Hubs play in supporting enabling/tertiary preparation courses for students from under-represented backgrounds?

A key function of the University Study Hubs should be to provide for delivery of enabling programs by one or more university (see answer above to Q2.).

Where will they be located?

12. What factors should be considered when selecting locations for Suburban University Study Hubs?

The “quantitative data analysis and research...[and]...additional stakeholder engagement...” outlined in the Consultation Paper (p. 5) is a sound approach to identify areas and populations most in need of improvement in participation and attainment. The analysis would need to measure *future* need, for example by forecasting population change in the medium term. This work will inform where the University Study Hubs *could* be sited, rather than where they *will* be sited, given that the latter will rely on suitable bids emerging.

The Department’s process for selection of locations for the previous Regional University Centres was informed by the [scoping study report](#) by Deloitte Access Economics, 2021, and doubtless the Department would seek to use a similar approach with this Program.

Importantly, the Department’s analysis and assessment for establishing *prospective* locations for new University Study Hubs must be transparent. A public consultation exercise should be undertaken with the communities at each prospective site. Decisions must be made without political interference, or the influence of lobbying by federal senators, state governments, or community leaders.

Who can apply?

15. What skills, services and attributes should an organisation be able to demonstrate...?

Given their understanding of the needs of current students, ready access to education professionals and knowledge of contemporary learning experiences, the Suburban University Study Hubs should be operated by established universities with existing connections to the communities where the Hubs will be sited.

While the Consultation Paper makes much of the virtue of the previous Regional University Centres approach “...allowing local communities to drive establishment and operations based on community need” (p. 2), it probably overstates how Regional University Centres have used “local knowledge to tailor their offerings to students and the community” (p. 2). The Consultation Paper is not clear as to what in practical terms is meant by “Tailored wrap-around support will be based on local community and student need.” (p. 4).

Community-led organisations do not have the resources, knowledge, or skills to deliver high quality, contemporary, technology-led approaches to higher education student learning and study support. If this Program is to deliver real improvement in access, participation and attainment in higher education for disadvantaged communities, funding needs to be directed to existing higher education providers with consistent and professional approaches to equity in education. Through the competitive bidding process these universities would demonstrate understanding of, and ongoing commitment to, the specific needs of the local community and businesses where a prospective Suburban University Study Hub would be sited.

17. Should a single organisation be eligible to operate multiple hubs?

A single operator of multiple sites might provide for better consistency in service levels and quality. In such a case, the organisation would need to provide assurances that the specific needs of communities in different locations would be considered and responded to. This might include demonstrating that they already have established links to those various communities and tailor their activities to local needs.

18. How could the Suburban University Study Hubs encourage collaboration between hubs and education providers (including universities and VET)?

The most appropriate model for operation of Suburban University Study Hubs is through a collaborative venture with a single university leading a group of other higher education providers, that consults with local industry and community representatives.

Collaboration is inherent in the operation of the University Study Hub, and consultation with the local community is required to ensure these facilities are relevant and viable. In reality, universities with local students enrolled in their courses and wishing to access the University Study Hub facilities would be participants in University Study Hub collaborations, either as the lead university, or as the collaborating providers.

A 'provider-agnostic' model (p. 3) is probably unrealistic. The University Study Hubs are intended to be complementary to facilities and services provided by universities and other higher education providers operating in an area of established need. Higher education providers have a regulatory obligation to support their enrolled students, and are funded through teaching grants and student fees to do so. A provider-agnostic model, where the students of *any* tertiary educational institution can access a University Study Hub, free of charge, would lead to subsidisation of uninvolved providers, and a possible retreat from the obligations those providers have to their students.

While excluded by the Consultation Paper, consideration needs to be given to a more effective Program design that would allow the University Study Hubs to be integrated into current universities, so that equivalence in learning experiences is achievable. The Regional University Study Hub program should be amended to allow these sites to be university operated.

What will the program fund?

19. What incentives would be most effective to promote partnership development...?

Suburban and Regional University Study Hubs need to be better resourced than the Regional University Centres under the previous program. The Consultation Paper discusses how

Commonwealth funding might be supplemented by matching funding and in-kind contributions from other sources, and raises the possibility of a dedicated stream of funding - presumably within the existing funding envelope (and therefore diverting away some of the \$66M Program funding) - to "...establish or support partnerships..." (p. 7).

The Consultation Paper hints that the Program funding will be in separate pools for capital works and for ongoing operational costs. ECU does not favour the further fragmentation of the Program funding with a third pool for partnerships.

Funding to incentivise partnerships would be unnecessary in an operating model based on collaborations between universities with students enrolled in their courses, who access the facilities of the University Study Hub with the support of their enrolling university.

20. What learnings are there from existing initiatives, and/or are there new ideas that could support the design and development of the Suburban University Study Hubs?

ECU's recently opened [Learning Centre in Busselton](#) provides regional online students with effective ways to build their peer and professional networks, and for local businesses to collaborate with the University for education and professional development.

The facilities include open-plan collaboration spaces, independent study spaces, dedicated meeting rooms with conferencing facilities and a large training room. The Learning Centre is staffed by Learning Advisors, and a full-time concierge, and offers face-to-face appointments with academics and learning support staff. The facilities will also be used to run intensive workshops and short courses with local businesses.

Additional feedback

A new and bold approach is needed to support improved university participation by regional and suburban communities and to deliver meaningful and measurable improvement in educational attainment.

Unfortunately, the Consultation Paper sets parameters for the Program that specifically exclude the consideration of more innovative approaches. This narrow approach to program design has potential to deliver less effective outcomes than might otherwise be possible.

In addition to the points raised above, the following matters need further consideration in the design of the Program:

Program evaluation and the performance of operators

Processes for evaluation of the Program, including the monitoring and reporting on outcomes for students needs to be considered now and built into the Program design – the principles, functions, eligibility, exclusions, and expected outcomes. In this regard, there are lessons to be learned from the Regional University Centre program, where evaluation appears to have been an afterthought.

Despite the assertions of the Consultation Paper, it is doubtful that there is strong evidence for improved outcomes under the previous Regional University Centre program. 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 has not been able to use national student data collections for assessing student outcomes for those supported in their studies by the Regional University Centres.

The Consultation Paper refers to a 2021 evaluation of the Regional University Centres program (p. 2). This review by Cox Inall Ridgeway and Urbis was a one-off assessment that does not provide for continuing, or extensive, monitoring and evaluation.

The role of the Department, and unnamed “others” in supporting the data and knowledge sharing collaborations between Suburban University Study Hubs (p. 3) is unclear. This expectation needs to be better defined and built into the performance evaluation and improvement processes for University Study Hub operators.

University Study Hubs or Tertiary Study Hubs

It is unclear to what extent these facilities are to provide support for vocational education and training students and the expected level of involvement for VET providers (p. 3). It is curious that the programs – both for regional and suburban sites - are named *University* Study Hubs. If the intent is to facilitate increased articulation from vocational education into higher education, as a way of increasing access to university study, then this is not explicit.

Application process

A competitive application process (p. 6) does not guarantee that identified need will be met. How will the application process dovetail with the Department’s “quantitative data analysis and research...[and]...additional stakeholder engagement...” (p. 5) to identify areas and populations most in need of improvement in participation and attainment?

Further information

Queries relating to the content of this submission may be addressed to Professor Arshad Omari, Senior Deputy Vice-Chancellor, by email [REDACTED] or by telephone [REDACTED].

Yours sincerely



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