



# CONSULTATION PAPER: IMPLEMENTING SUBURBAN UNIVERSITY STUDY HUBS

October 2023

University of the Sunshine Coast submission

## Contents

Executive Summary .....	1
Introduction .....	3
About UniSC .....	3
1. Needs based approach.....	4
1.2 Location assessment .....	4
1.2 Place-based assessment .....	5
1.3 Leveraging existing assets, activity or planned investment.....	6
2. Services, support and success.....	6
2.1 Widening participation .....	6
2.2 Educational profile .....	7
2.3 Lifelong learning.....	7
3. Operations and funding .....	7

## **Executive Summary**

The University of the Sunshine Coast (UniSC) is pleased to provide a submission in response to consultation on the establishment of Suburban University Study Hubs.

We applaud the Government's focus on improving tertiary access and opportunity and note the important and unique role that regional universities have played, and continue to play, in meeting this need in the regions and amongst underrepresented groups of the community.

Our submission is structured as follows:

### **1. Needs based approach**

With respect to the location based criteria for the establishment of a Suburban University Study Hubs, UniSC agrees with the criteria for low university attainment. However, we are concerned that the reference in the consultation paper to "where access to university is limited" has a different interpretation to the language used by the Minister for Education when announcing the initiative i.e. "in areas without a significant physical university campus". We believe the latter definition is more appropriate to minimise risk of duplication of investment of public funds.

Where a comprehensive needs-based approach demonstrates potential demand for a need for a Suburban University Study Hub, a place-based approach must subsequently engage as many relevant local stakeholders as possible to plan and activate the site and provide appropriate services that optimise student attraction, retention and attainment.

### **2. Services, support and success**

There may be a role for Suburban University Study Hubs to facilitate the delivery of tertiary readiness programs, where there is a service gap in particular locations, preferably by partnering with an existing provider, or in rare cases delivering programs themselves.

Suburban University Study Hubs could also be resourced to deliver targeted equity student support services, noting this should not replace the requirement of, or the funding to, existing providers to provide these supports to their students. Careful consideration would therefore be required on how to deploy such supports e.g. agreed shared services between education providers or co-located or proximate to relevant community organisations.

### **3. Operations and funding.**

While generally in agreement with the proposed operational and funding parameters, given the inherent conflict of interest challenge and risk of using a hub strategically from a market share perspective, UniSC does not believe that individual university or TAFE/VET providers should be able to operate a Suburban University Study Hub.

We would also like to see further clarity on the funding model split between Suburban University Study Hubs and university or TAFE/VET providers when it comes to the potential provision of enabling programs and student support services.

## Recommendations

### Needs based approach:

1. *The final Suburban University Study Hubs guidelines have clear location-based criteria with respect to their proximity to existing university campuses.*
2. *The Government collaborate with the sector and other stakeholders to identify opportunities to invest in existing outer metropolitan / peri-urban university campuses, where relevant, to ensure those campuses offer comparable services to a Suburban University Study Hub, including public transport access and availability of complimentary services.*
3. *The Department's location-based quantitative data analysis and research include demographic, participatory, skills and employability gaps (current and future) and available existing and required infrastructure.*
4. *The Department undertakes location-based qualitative research via stakeholder consultation and engagement to validate the quantitative data analysis and research. This provides an opportunity to extract nuance as part of a place-based analysis.*
5. *Ensure Suburban University Study Hubs have sufficient flexibility in their operating models to respond to diverse local needs.*
6. *Ensure that there is a comprehensive place-based implementation approach for Suburban University Study Hubs to mitigate potential participation barriers, maximise delivery of locally relevant services and avoid duplication of locally available education, training or other relevant student supports.*
7. *Ensure Suburban University Study Hubs are required to consider and seek to leverage relevant federal, state and local government funding programs and other education and training investments that support the goal of increasing tertiary participation and attainment rates.*

### Services, support and access:

8. *Where there is a service gap, ensure Suburban University Study Hubs are able to partner with existing tertiary providers in that region model to deliver higher education readiness programs.*
9. *Ensure Suburban University Study Hubs are resourced to deliver appropriate equity student support services to maximise completion rates, in partnership with existing tertiary providers in that region to minimise duplication and maximise student clarity around accountabilities.*
10. *That the Government move quickly to implement relevant considerations in the Accord Interim Report to enhance the student, provider and industry benefits of the Suburban University Study Hubs.*
11. *Ensure Suburban University Study Hubs are required to drive lifelong learning attitudes and opportunities, including by partnering with relevant government, private sector and community organisations.*

### Operations and funding:

12. *Ensure community-led organisations operating a Suburban University Study Hub have a demonstrated knowledge of the tertiary sector, particularly legislation and processes required to support student success.*
13. *Remove the option for single university or TAFE/VET providers to operate Suburban University Study Hubs due to inherent conflict of interest and potential market competition issues.*
14. *Allow school students and mature age people, with a genuine need, to use Suburban University Study Hubs on a temporary basis for the purpose of applying to a tertiary education or training provider.*

## Introduction

The University of the Sunshine Coast (UniSC) welcomes consultation on the Suburban University Study Hubs and is pleased to provide a response to the Consultation Paper<sup>1</sup>.

We applaud the Government's focus on improving access and opportunity to higher education for all Australians and note that this policy objective supports our UniSC's mission statement and values i.e. *to create opportunities for all and advocate for equitable access to education and knowledge*<sup>2</sup>.

UniSC's submission is structured as follows:

1. Needs based approach
2. Services, support and success
3. Operations and funding.

We would also highlight the important and unique role that regional universities have played, and continue to play, in meeting the needs of our communities, especially those who are traditionally more disenfranchised from tertiary education and the lifelong benefits that it can provide.

UniSC would welcome the opportunity to elaborate on any aspect of our submission. If this is of interest, please contact Jason Mills, Head of Government Relations, on [REDACTED]

### About UniSC

UniSC was founded by its community in 1996 after Sunshine Coast residents campaigned for locally provided tertiary education opportunities. Consistent with our mission to improve access to higher education in underserved locations, we have strategically expanded our footprint, encompassing campuses and facilities from Moreton Bay to the Fraser Coast. We also collaborate closely with all levels of government, regional leaders, industry, and other partners to ensure our programs, research and support services align to create greater opportunities for all.

Among public universities, UniSC is number one in Queensland for overall educational experience, and the best in Australia for postgraduate skills development<sup>3</sup>. In the Good Universities Guide 2023/24<sup>4</sup>, we have 15 five-star ratings in key areas of student satisfaction, including overall experience, teaching quality, student support, social equity, skills development and first generation and learner engagement (postgraduate). This is in the context of a diverse student profile which in 2023 included 39 per cent of students who are first in their family to attend university, 13.3 per cent who have a declared disability, 3.6 per cent who are Indigenous, 60 per cent who are mature age (i.e. over 20 years of age) and 35 per cent who study part-time. In addition, in 2023 90 per cent of our graduates were employed within four months of finishing their degrees.

On the world stage, UniSC is recognised by The Higher Education (THE) Impact Rankings as a global leader in climate action, clean water sanitation, life on land, and life below water. This ranking comes alongside the Australian Research Council's recognition of UniSC as a producer of world-class research in 26 specialty areas, including environmental science, medical and health sciences, neuroscience, technology, and psychology.

---

<sup>1</sup> <https://www.education.gov.au/suburban-university-study-hubs/announcements/consultation-paper-implementing-suburban-university-study-hubs>

<sup>2</sup> <https://www.usc.edu.au/about>

<sup>3</sup> [https://www.qilt.edu.au/surveys/student-experience-survey-\(ses\)#latest](https://www.qilt.edu.au/surveys/student-experience-survey-(ses)#latest)

<sup>4</sup> <https://www.gooduniversitiesguide.com.au/course-provider/university-of-the-sunshine-coast-unisc/ratings-rankings/undergraduate>

## 1. Needs based approach

### 1.2 Location assessment

The Consultation Paper confirms Suburban University Study Hubs will be located in “outer metropolitan / peri-urban areas where access to university is limited and university attainment is low”. UniSC agrees with the criteria for low university attainment, however we are concerned that the reference “*where access to university is limited*” could have a different interpretation to the much clearer language used by the Minister for Education when announcing the Suburban University Study Hubs on 18 July 2023 i.e. “*in areas without a significant physical university campus*”<sup>5</sup>.

UniSC contends that the Minister’s description for this important location-based selection criteria is more appropriate as it removes the risk of applicants proposing a Suburban University Study Hub too close to existing university campuses given the plethora of in-need locations without a nearby campus. Establishing a Suburban University Study Hub near existing, publicly funded, campuses which have a demonstrated history of addressing the same policy objectives of driving higher education aspiration, participation and attainment, would not be a sound use of public funds. If there are existing outer metropolitan / peri-urban university campuses that are not deemed to be delivering on these policy objectives, a more efficient use of public funds would be to invest in those campuses to expand their accessibility and offerings.

With respect to additional needs-based considerations and criteria, we provide the following comments and ideas for consideration:

- We support the intent of Suburban University Study Hubs being co-located with existing infrastructure and/or leveraging other appropriate community infrastructure.
- It will be important to recognise pockets of disadvantage may exist within broader outer metropolitan / peri-urban regions. For example, the Redlands Bay region (south of Brisbane) appears to have relatively high levels of tertiary education attainment, however there are areas in the region with a high percentage of equity groups where a lack of accessibility to tertiary education, including due to poor public transport, has contributed to very low attainment levels.
- Engaging with the entirety of the education sector as well as industry to reduce potential duplication and fragmentation of awareness and service delivery. For example, schools are a key stakeholder given aspiration for tertiary education begins during school years, particularly for those who are the first in their family to engage in post-secondary education.
- A place-based employability mapping focus, including current skill gaps, future industry talent development and an assessment of retraining requirements of non-school leavers. For example, NGOs or relevant private premises with the potential to enable multiple services in a single location<sup>6</sup>, especially where related to areas of current or future skills demand (e.g. health).
- Alignment with relevant state and/or local government education, training and industry development funding programs as well as infrastructure and public transport initiatives. For example, the proposed establishment of nationally networked TAFE Centres of Excellence<sup>7</sup>.
- Public transport considerations should extend beyond the availability and distance of the proposed location of a Suburban University Study Hub and existing tertiary education providers, to location clusters of equity groups within the region as well as relevant government and community infrastructure and services<sup>8</sup>.

---

<sup>5</sup> <https://ministers.education.gov.au/clare/improving-access-university-outer-suburbs-and-regions>

<sup>6</sup> Hub68

<sup>7</sup> <https://ministers.dewr.gov.au/oconnor/communique-skills-ministers-meeting>

<sup>8</sup> <https://aifs.gov.au/resources/policy-and-practice-papers/relationship-between-transport-and-disadvantage-australia>

- Ability for students accessing the Suburban University Study Hub to easily access employers for mandatory program placements and/or other work integrated learning opportunities, in close consultation with the relevant provider. For example, proximity to health precincts (e.g. nursing) and schools (e.g. initial teacher education).
- A process to assess community readiness to host a Suburban University Study Hub.
- Consideration of planned education and training infrastructure in the region by tertiary education providers so as not to duplicate investments, particularly they are publicly funded.

### Recommendations

1. *The final Suburban University Study Hubs guidelines have clear location-based criteria with respect to their proximity to existing university campuses.*
2. *The Government collaborate with the sector and other stakeholders to identify opportunities to invest in existing outer metropolitan / peri-urban university campuses, where relevant, to ensure those campuses offer comparable services to a Suburban University Study Hub, including public transport access and availability of complimentary services.*
3. *The Department's location-based quantitative data analysis and research include demographic, participatory, skills and employability gaps (current and future) and available existing and required infrastructure.*
4. *The Department undertakes location-based qualitative research via stakeholder consultation and engagement to validate the quantitative data analysis and research. This provides an opportunity to extract nuance as part of a place-based analysis.*

#### 1.2 Place-based assessment

Like the existing Regional University Centres, Suburban University Study Hubs are likely to require a range of model types that are informed by local community demographics, education requirements, support needs, existing infrastructure and so on. Local populations can be expected to be diverse and require an approach that is safe, welcoming, supportive, technologically enabled, community connected and collaborative.

A place-based approach should also consider:

- Cultural safety and appropriate spaces
- Accessibility and Universal Design for Learning principles
- Participatory barriers (e.g. childcare / caring requirements, psychosocial factors, mental health, financial, mobility, employment, digital fluency, culturally and linguistically diverse)
- Access to local tertiary enabling/ bridging programs.

Where a comprehensive needs-based approach demonstrates potential demand for a need for a Suburban University Study Hub, a place-based approach must subsequently engage as many relevant local stakeholders as possible to plan and activate the site and provide appropriate services that optimise student attraction, retention and attainment. These stakeholders may include local education and training providers, councils, NGOs, childcare providers, disability services and careers and employment organisations.

### Recommendations

5. *Ensure Suburban University Study Hubs have sufficient flexibility in their operating models to respond to diverse local needs.*
6. *Ensure that there is a comprehensive place-based implementation approach for Suburban University Study Hubs to mitigate potential participation barriers, maximise delivery of locally relevant services and avoid duplication of locally available education, training or other relevant student supports.*

### 1.3 Leveraging existing assets, activity or planned investment

As with the existing Regional University Study Hubs, it will be important for Suburban University Study Hubs to consider and leverage relevant federal, state and local government funding programs and other initiatives that support the goal of increasing higher education participation and attainment rates. For example, the development of nationally networked TAFE Centres of Excellence<sup>9</sup> provide opportunities for co-location, or at least collaboration, when considering regional and suburban study hub locations and models across Queensland. Indeed, greater collaboration between TAFE, universities and industry would be welcomed and the NSW Government's Institute of Applied Technology (IAT) model<sup>10</sup> provides a great example.

#### Recommendations

7. *Ensure Suburban University Study Hubs are required to consider and seek to leverage relevant federal, state and local government funding programs and other education and training investments that support the goal of increasing tertiary participation and attainment rates.*

## 2. Services, support and success

### 2.1 Widening participation

Build tertiary aspiration, participation and attainment amongst equity groups requires efforts to both determine and then influence their readiness to participate. Such programs often include:

- School and community outreach and engagement
- Literacy, numeracy and/ or study skills programs
- Career education advice
- Foundation course delivery
- Enabling course delivery.

Where existing providers are not already servicing a particular region, or are unable to due to funding constraints, there may be a role for Suburban University Study Hubs to facilitate the delivery of tertiary readiness programs, preferably by partnering with an existing provider or in rare cases, delivering programs in their own right.

Given the traditionally higher attrition rates of equity group students, Suburban University Study Hubs could also be resourced to deliver appropriate equity student support services to maximise completion rates. The provision of such support services should not replace the requirement of, or the funding to, existing providers to provide these supports to their students. Careful consideration is therefore required on the model to deploy such equity student support, from agreed shared services between education providers to co-located or proximate community organisations. Further, these kinds of support triage must be clearly articulated to students when presenting to an organisation agnostic location.

#### Recommendations

8. *Where there is a service gap, ensure Suburban University Study Hubs are able to partner with existing tertiary providers in that region model to deliver higher education readiness programs.*
9. *Ensure Suburban University Study Hubs are resourced to deliver appropriate equity student support services to maximise completion rates, in partnership with existing tertiary providers in that region to minimise duplication and maximise student clarity around accountabilities.*

---

<sup>9</sup> <https://ministers.dewr.gov.au/oconnor/communique-meeting-federal-state-and-territory-skills-ministers-1>

<sup>10</sup> <https://education.nsw.gov.au/skills-nsw/skills-initiatives/institute-of-applied-technology.html>



## 2.2 Educational profile

For Suburban University Study Hubs to be truly successful, a heightened focus on national skills priorities, future skills and placed based talent needs are critical. This will require deeper connectivity between all parts of the education and training sectors and the delivery of several *areas for further consideration* in the Universities Accord Interim Report including:

- Increasing delivery of preparatory programs, including across VET and universities, as pathways into higher education, with consistent recognition across all institutions
- Improving the integration of higher education and VET to create new types of qualifications starting in areas of national priority – like clean energy, the care economy, and defence
- Improving skills pathways by creating qualifications that are more modular, stackable and transferable between institutions and institution types
- Addressing barriers that prevent VET and higher education working together, especially in courses and institutions that involve both sectors.

### Recommendations

10. *That the Government move quickly to implement relevant considerations in the Accord Interim Report to enhance the student, provider and industry benefits of the Suburban University Study Hubs.*

## 2.3 Lifelong learning

As already noted, Suburban University Study Hubs must respond to placed-based requirements for future employability needs. Enabling these to allow for co-location of relevant services, where appropriate, could enhance dissemination of advice on up-skilling and re-skilling to support participation and economic growth. The Singapore model, where a place-based upskilling and reskilling approach has been utilised to build future workforce capacity could also be considered, where relevant to the Australian context<sup>11</sup>.

Suburban University Study Hubs should also support lifelong learning attitudes and opportunities. For example, they could host online industry certifications, engaging industry partners in place-based reskilling approaches. Participation from like-minded community organisations could also be enabled, for example by co-locating with relevant education groups like as U3A.

### Recommendations

11. *Ensure Suburban University Study Hubs are required to drive lifelong learning attitudes and opportunities, including by partnering with relevant government, private sector and community organisations.*

## 3. Operations and funding

UniSC generally agrees with the proposed operational and funding parameters for the Suburban University Study Hubs, particularly the provider agnostic focus on students consistent with the current Regional University Study Hub model.

We have concerns about the ability of an individual university or TAFE/VET provider to be truly agnostic should they be successful in seeking to operate a Suburban University Study Hub. We believe the inherent conflict of interest would be problematic to manage and present too great a risk given the expected strong interest in community-led organisations or joint ventures operating these Hubs. Further, even if operational conflict of interests could be adequately managed, an individual provider operating model still has the potential to be used strategically. For example, for a

---

<sup>11</sup> <https://hrsea.economictimes.indiatimes.com/news/industry/how-singapore-is-winning-the-upskilling-challenge/10098252>  
<https://www.myskillsfuture.gov.sg/upskill/>

university with no physical presence in a region due to their lack of investment, but with a share of the student market, operating a Suburban University Study Hub in that region could provide a zero-cost market entry opportunity to increase their market share, at the expense of another university who has invested to create a physical campus and/or other student accessibility facilities.

UniSC would like to see further clarity with respect to the funding model between Suburban University Study Hubs and university or TAFE/VET providers when it comes to the potential provision of enabling programs and student support services.

Ideally, community-led organisations operating a Suburban University Study Hub should have a demonstrated knowledge of the sector, particularly legislation and processes required to support student success.

Given the success of the Country Universities Centre model in relation to the existing Regional University Study Hub network, UniSC has no concerns with a single organisation being able to operate multiple Suburban University Study Hub sites (noting our view above regarding individual university or TAFE/VET provider not being eligible). Indeed this approach has the potential to strengthen the capabilities of individual hubs, deliver cost efficiencies and facilitate more strategic partnerships with tertiary education providers.

With respect to accessibility, in addition to current tertiary students, we would argue that school students and mature age people who require the use of such facilities (for example access to a computer / Internet) for the purpose of applying to a tertiary education or training provider should also be able to access Suburban University Study Hubs, even if only for limited periods of time and potentially by appropriate proof of intent.

#### Recommendations

12. *Ensure community-led organisations operating a Suburban University Study Hub have a demonstrated knowledge of the tertiary sector, particularly legislation and processes required to support student success.*
13. *Remove the option for single university or TAFE/VET providers to operate Suburban University Study Hubs due to inherent conflict of interest and potential market competition issues.*
14. *Allow school students and mature age people, with a genuine need, to use Suburban University Study Hubs on a temporary basis for the purpose of applying to a tertiary education or training provider.*