

## National Priorities and Industry Linkage Fund (NPILF) Consultation

### Submission from the University of Canberra

October 2020

University of Canberra thanks the Department of Education, Skills and Employment (DESE) and the National Priorities and Industry Linkage Fund (NPILF) working group for conducting consultation on the NPILF and welcomes the opportunity to provide a submission in response to the consultation paper.

The University recognises that the NPILF is an important component within the Job-ready Graduates package and the establishment of this new fund presents opportunity for universities to strengthen work-integrated learning (WIL), STEM+ and University-industry partnerships.

Our comments in this submission focus first and foremost on **principles for the allocation of NPILF funding**.

Also included in this submission are observations on the proposed framework for demonstrating engagement, issues around timing, and need for further understanding around clinical placements and teaching practicums.

### 1. Allocation of funding

The Job-ready Graduates package presents reform around the funding model for universities. The new model sees a reduction in per student funding, with 'savings' redirected for block funding against new national priorities, including under the NPILF. It then stands to reason that NPILF funding should not be distributed solely based on the number of Commonwealth Supported Places (CSP). The reform allows for a deliberate move away from per student funding.

University of Canberra is broadly supportive of the concept of four funding bands as applied during the transition years. Although we do note that in the transition years the funding increase from one band to the next is not consistent. It is our observation that these transition bands have some assumption of 'base funding' built in. This recognises the cost of a base level of industry engagement, irrespective of student load.

**This is crucial in enabling smaller universities to be adequately resourced to meet goals under the NPILF.**

Many of the smaller Australian universities are also young universities, without the legacy of generational wealth. Size of institution should not equate to success under the NPILF.

In considered new funding bands going forward, University of Canberra suggests the following set of principles:

1. the need for base funding, irrespective of student load
2. fairness in consistent increases from one band to the next
3. funding bands that are simple to communicate and transparent in terms of public accountability
4. broad bands that provide funding certainty and can be planned for in university budgets

University of Canberra has modelled the impact of different funding models against these principles and **strongly suggests increasing the proportion of base funding going forward.**

Our proposed model assumes that approximately half of NPILF in any given year is allocated as a base, with the remainder distributed according to bands of CSP.

Under this model the funding increase from one band to the next would be consistent at \$925,000.

We propose the following new bands:

Band Criteria (2018 CSPs)	NPILF funding in 2021*
0 - 9,999	\$4,575,000
10,000 - 14,999	\$5,500,000
15,000 - 21,999	\$6,425,000
22,000 and above	\$7,350,000

\* rates to be indexed from 2021

Appendix 1 shows a reworking of the DESE Job-ready Graduates Technical Note, Attachment C table of NPILF allocation per institution in 2021 with band criteria (2018 CSPs). This shows that new funding bands proposed by University of Canberra would be cost neutral in total.

## 2. Framework for demonstrating engagement

University of Canberra has considered the proposed framework for demonstrating engagement, by worked example indicators, including both those provided in the consultation paper and others identified internally.

Following this exercise, we are broadly supportive of the framework presented in the consultation paper. Our 'user-testing' of the proposed framework suggested the following:

- The framework allows a balance between acknowledging good work that universities are already undertaking and driving improvements.
- Examples in the consultation paper are clear and serve as thoughtful prompts for identifying others.
- It is not difficult to distinguish between the concepts of metrics, demonstrators, and innovators.
- Twelve indicators are about the right amount. More than nine allows for universities to emphasise distinct missions. More than twelve could be difficult to work towards.

## 3. Timing and process

The consultation paper proposes that NPILF plans be lodged as part of Mission Based Compacts (MBCs). University of Canberra observes that MBCs are a requirement under the Higher Education Support Act but are now out of alignment with Funding Agreements. Current Funding Agreements are for 2018, 2019 and 2020 and will end on 31 December 2020, while current MBCs are only for 2019. Universities will soon begin preparation of MBCs for 2020, outlining strategies and initiatives for this calendar year. While the exercise is mandatory, it makes no sense for universities to prepare this document retrospectively.

There are similar concerns for timing around NPILF plans, discussions with DESE and formal agreements. The consultation paper proposes that universities provide a NPILF plan in November, with a DESE review phase from November-March, before being finalised as the current year's agreement. This timeframe does not at all align with university planning cycles. Initiatives would already be in place and the first quarter of the calendar year

complete by the time a NPILF agreement was reached, making any required adjustments to goals identified in the NPILF plan challenging to implement effectively.

It appears that this timeframe has been suggested such that it fits in with NPILF assessment of activities, creating an annual process. While this may in part minimise new 'red tape', the overall timeframe would not be conducive to driving and monitoring change.

The NPILF planning and evaluation processes must be efficient and effective. They must allow for planning certainty.

It would be preferable for NPILF plans to be agreed to as part of a more-timely process aligned with the three-year MBCs. University of Canberra suggests that most universities would maintain a plan over more than one year. Change cannot always be affected more frequently.

An annual reporting and evaluation process could be separate to this. Universities could be given the option to vary a NPILF plan in any given year if required and subject to agreement by the Department.

#### 4. Clinical placements and teaching practicums

Under the Job-ready Graduates package it is uncertain how clinical placements and teaching practicums will be funded. We are disappointed that the consultation paper on the NPILF does not address this.

Current funding agreements between the Commonwealth and universities notionally allocate funding for teaching practicums and nursing clinical places within per student Commonwealth contributions. Under the new model, per student funding has been reduced and it is not clear if this has now been moved to the NPILF.

University of Canberra knows what it takes for graduates to be job ready and our important role in providing skills into the Canberra and region economy is evident. We are a university with a civic mission and a focus on professions. We are sector leading in WIL and have industry placements embedded in every course.

Costs for WIL vary significantly by discipline. There are some courses in the sector where university costs for work placements are minimal and some where students may even be paid. Some students are paid for internships by the employer, and in others the universities must pay the enterprises to place the students. There are courses with major costs associated that are not recognised in this NPILF process.

Courses with particularly high university costs for placements include education, nursing, physiotherapy, speech pathology, occupational therapy, clinical exercise physiology, nutrition and dietetics, pharmacy, midwifery, optometry, and mental health professional courses such as clinical psychology counselling. University of Canberra offers courses in all these disciplines.

University of Canberra observes that the true university cost of clinical placements for Allied Health courses in 2021 will exceed its total funding under the NPILF.

By way of example, the University costs for clinical placements in physiotherapy are around \$5,100 per student over the duration of the course. University of Canberra expects NPILF funding in 2021 to equate to less than \$400 per CSP.

## Appendix 1 – University of Canberra proposed NPILF allocations by University and Band

Band (2018 CSPs)	University	2018 CSPs	NPILF 2021*
0 - 9,999	Charles Darwin University	4,611	\$4,575,000
	Federation University Australia	5,980	\$4,575,000
	Southern Cross University	6,915	\$4,575,000
	University of Canberra	8,429	\$4,575,000
	The Australian National University	8,436	\$4,575,000
	University of the Sunshine Coast	8,856	\$4,575,000
	Murdoch University	9,164	\$4,575,000
	James Cook University	9,285	\$4,575,000
	CQUniversity	9,640	\$4,575,000
10,000 - 14,999	The University of New England	10,620	\$5,500,000
	University of Southern Queensland	11,086	\$5,500,000
	Victoria University	11,127	\$5,500,000
	The University of Western Australia	12,630	\$5,500,000
	Flinders University	12,715	\$5,500,000
	Charles Sturt University	13,051	\$5,500,000
	The University of Adelaide	13,260	\$5,500,000
	University of Wollongong	13,769	\$5,500,000
	Edith Cowan University	14,083	\$5,500,000
	University of Tasmania	14,809	\$5,500,000
15,000 - 21,999	Swinburne University of Technology	17,321	\$6,425,000
	University of South Australia	17,629	\$6,425,000
	The University of Newcastle	18,739	\$6,425,000
	Australian Catholic University	20,478	\$6,425,000
	La Trobe University	20,595	\$6,425,000
	University of Technology Sydney	20,846	\$6,425,000
	Macquarie University	21,152	\$6,425,000
22,000 and above	Curtin University	22,000	\$7,350,000
	The University of Melbourne	23,038	\$7,350,000
	University of New South Wales	23,507	\$7,350,000
	The University of Queensland	24,087	\$7,350,000
	The University of Sydney	24,883	\$7,350,000
	RMIT University	24,969	\$7,350,000
	Griffith University	26,455	\$7,350,000
	Deakin University	27,350	\$7,350,000
	Queensland University of Technology	28,008	\$7,350,000
	Western Sydney University	28,555	\$7,350,000
	Monash University	29,771	\$7,350,000
	<b>Total</b>		<b>617,850</b>

\* rates in 2021 funding will need to be indexed