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Our ref:

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Professor Mary O’Kane, AC  
Chair, Australian Universities Accord Panel

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## Consultation on the Accord Terms of Reference

### Submission from Edith Cowan University

Your letter of 24 November 2022 invited submissions from stakeholders on the priority issues for consideration by the Australian Universities Accord Panel.

Edith Cowan University welcomes the opportunity to provide input and the following is a brief list of suggested policy positions for the Panel’s consideration, arranged under the seven key areas outlined in the Terms of Reference for the Review.

#### Australia’s knowledge and skills needs

1. Provide a new nomenclature that distinguishes between **micro-credentials and short courses**. Clearly articulate the value and purpose of each and set criteria for government regulation that would *minimise* government oversight of micro-credentials in Australia.
2. Redefine higher education, with a primary focus on **life-long learning and contemporary learning experiences**, to better recognise the needs of mature-aged citizens seeking to upskill and change professions. Consider what financial incentives should be offered to incentivise university coursework study *and* higher degree by research study.
3. Review how employees, business and governments **contribute to the costs of professional skills development** and identify new mechanisms for co-funding university study.
4. Establish a **labour market analysis and skills demand model** that has universal application by universities, employers and all levels of government, to drive sound policy decisions to address current and future skill demands.
5. Build on the *Australian Strategy for International Education 2021-2030* by clearly articulating the **relationship between onshore international student numbers, graduates with post-study work rights, and permanent migration visa numbers and set annual national targets**. Make co-operation between universities and government at all levels, a key principle for implementation. Consider how access to HELP and other government assistance might be tied to permanent residency and citizenship in areas of skill shortage and future demand.

#### Access and Opportunity

6. Establish a **national program for university preparation** where a certificate award provides access to undergraduate programs nationwide. Provide funding to a consortium of universities and other providers, with best practice experience and expertise to design and deliver these courses.

7. Redefine **equity student cohorts** to recognise contemporary views of the educational disadvantage of individuals, to replace the “Martin indicators” for equity groups. Address issues of intersectionality between equity groups by developing a new composite *educational disadvantage index*, based on weighted, multiple indicators of disadvantage.
8. Establish **targets for equity cohort participation** that are state-based and properly reflect reference rates in the general population. Collect consistent data on equity cohort prevalence in all sectors of education and training (including applicants), to help inform meaningful targets.
9. Establish a **suite of financial support arrangements for prospective students experiencing financial hardship** (e.g. demand driven funding, discounted student contribution amounts, FEE-HELP rebates, scholarships or bursaries for undertaking unpaid internships and practicums). Make these widely promoted, easily understood, simple to access and enduring.
10. Recommend **new approaches to higher education provision in regional communities**, that better understand how students study and how online learning, the on-campus learning environment and learner engagement *inter alia*, impact on student experiences and success, and cost-effectiveness in delivery.
11. Establish a **revised nomenclature for modes of study**, including definitions for *regular attendance* for on-campus study, to ensure consistent data reporting by providers. Ensure that the impact on international student requirements under the ESOS Act, and Commonwealth funding to universities is understood as part of these changes.
12. **Relax the 50% minimum pass rate requirements** for students in Commonwealth Supported Places and remove this requirement for enabling students, as it limits access and participation of under-represented students.

### Investment and Affordability

13. URGENT Reverse those changes introduced **under the Job-ready Graduates reforms** that have proven to be ineffective levers on supply and demand for courses, especially those that introduced supply side disincentives for universities to grow enrolments in disciplines where costs of teaching are not matched by funding. Until these changes are made provide short-term funding certainty to universities by recommending that the Minister allows the **extension of transition funding into 2024, together with a suspension of performance-contingent funding** adjustments in 2023 and 2024.
14. Redefine the contributions of government and individuals to teaching places at university, moving to a **flat rate for the Student Contribution amount, regardless of course**, in funding for Commonwealth Supported Places, and varying Commonwealth Contribution amounts based on the revenue necessary to meet the full cost of teaching in a discipline. Devise a comprehensive framework that defines the average costs of teaching courses in disciplines and use this information as the basis for funding universities for their student places.
15. Remove the current supply side constraints and cost pressures on universities in providing **work placements** (in schools, hospitals, industry, etc.) skill shortage areas, as part of a degree. Costs for work placements would be met by employers, with contributions to the employers’ costs provided by government(s).

### Governance, accountability and community

16. Undertake a **comprehensive “red-tape review” designed to reduce the administrative costs** to universities in meeting regulatory requirements. Better define the distinct roles and responsibilities of higher education providers and government agencies, including the information and services to students that might be better delivered by government agencies, rather than higher education providers.

## Higher Education and vocational education and training

17. Improve admissions **transparency and opportunities for articulation into higher education courses** for those with VET awards, utilising pro-forma agreements that can apply to all education providers in a state and/ or nationally.
18. Establish **clear and enduring co-funding arrangements for Commonwealth and state government funding of vocational education**, to move Australia to a tertiary education sector with consistent goals for post-secondary education access, participation and achievement.

## Quality and sustainability

19. **Consolidate government funding programs** to Table A universities (and include the *Indigenous Student Success Program*). Reduce administration around competitive funding programs, and acquittal and reporting obligations. Assess the effectiveness of performance-funding and competitive funding programs in driving university activity and outcomes.
20. Assign responsibility to the Australian Department of Education for **the effective use of funding for Commonwealth Supported Places**, through continuous monitoring and, in consultation with universities, the re-distribution of CSPs between providers when required.

## New knowledge, innovation and capability

21. **Discontinue Engagement in Research for Australia (ERA) assessments** and develop an efficient method of assessment of research quality in Commonwealth-funded research projects.
22. **Establish a full economic costing model** for university research, to inform a more equitable and sustainable approach to the allocation of research funding, recognising the varying capacities of universities to use domestic and international student fee income to cross-subsidise their research activity.
23. Provide **funding that incentivises cross-institutional research collaborations** and provides for necessary research infrastructure for those universities with more limited co-funding capacity.

## Further information

If you require further information or clarification, please contact Professor Arshad Omari, Senior Deputy Vice-Chancellor by email: [REDACTED] or by telephone: [REDACTED]

Yours sincerely



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