Mary O’Kane

Chair, Australian Universities Accord

Higher Education Division
Australian Government Department of Education

Thursday 15th December, 2022

Dear Mary O’Kane and the Australian Universities Accord Panel,

Thank you for the invitation to provide feedback on the priority issues outlined in the Terms of Reference for the Review.

Equity Practitioners in Higher Education Australasia (EPHEA) and our members consisting of over 800 equity higher education practitioners is focusing our feedback on the following two key areas:

1. Access and opportunity; and
2. The connection between the vocational education and training, and higher education systems.

Whilst some of the suggestions made below, may also fit within other key areas, such as investment and affordability, and meeting Australia’s knowledge and skills needs, now and in the future, we are viewing these through an equity lens and have such grouped them together under Access and Opportunity.

Within each of these key areas we will share our long-term vision, as well as identify short term priorities for the panel to consider.

1. **Access and opportunity**

A long term vision for an accessible and inclusive higher education system that removes barriers to participation for all Australians could be achieved through the following:

*(Noting that these levers would need to exist as an ecosystem of support, as opposed to activating any singular strategy).*

* **Reintroduction of Demand Driven Funding (DDF).** DDF demonstrated significant effectiveness in creating increased access and opportunity for underrepresented students in higher education. During its implementation from 2012 to 2017, significant increases in the participation of students from equity groups occurred (Indigenous undergraduate student enrolments had more than doubled (105 per cent); enrolments of undergraduate students with a disability had increased by 123 per cent; enrolments of students from regional and remote areas had increased by 50 per cent; and enrolments from students from low socio-economic status backgrounds (LSES) rose 66%). The expansion in equity student numbers in the LSES, Disability, Indigenous and NESB groups was greater (and faster) than overall growth of the undergraduate domestic population, which only rose by 45% (Norton, 2019).

***Recommendation 1: Reintroduce Demand Driven Funding for targeted equity groups.***

* **The introduction of a National Student Equity Strategy, inclusive of national and institutional Targets.** Under the Australia’s Widening Participation agenda, institutions have been rewarded based on the number of students from targeted equity groups that initially enrol at their institution. One of the most significant weaknesses of the DDF (2012 to 2017), was the high attrition rates that public universities experienced in ‘opening up higher education’ (Norton, 2020). We strongly advocate for the return of national, and subsequently institutional targets to increase equity student participation, however these targets must not only include access rates into higher education, but also sector completion rates to encourage universities to invest in significant supports to increase university completions as well as alternative exit pathways. Such an approach would enable the Labor Government to review elements of the Job Ready Graduate Package, including the punitive measures implemented around the 50% fail rate. Instead of penalising individual students, who are often vulnerable and at-risk, a shift to incentivising institutional completion rates, would enable a more strength based approach to higher education.

***Recommendation 2: Introduce national and institution-specific targets for access and completion established and monitored under a National Student Equity Strategy;***

***Recommendation 3: Repeal the 50% fail rate as part of the Job-Ready Graduate package.***

* **Investment in Graduate Outcomes.** Similar to the challenges that the DDF posed to university completion rates, graduate employability rates were also impacted by the introduction of the DDF (Australian Government Productivity Commission, 2019). According to the Graduate Outcomes Survey, students from targeted equity groups continue to obtain employment at a lower rate than the all student indicator, in particular, only 59% of students with disability and 53% of students who speak a language other than English are working full-time within four months post-graduation (2021 GOS Report Tables). These low graduate employment rates for students from targeted equity groups have significant implications for perpetuating cycles of disadvantage when it is known that nine out of ten new jobs will require post-secondary qualifications. Targeted, national career pathway programs, such as CareerTrackers that provide tailored career support for Aboriginal and Torres Strait Islander university students, and CareerSeekers that provide tailored career support to both refugee and people seeking asylum have a strong track record in increasing graduate employability after university completion. Further investment in national career programs that provide targeted support to students from underrepresented backgrounds, alongside the reintroduction of the DDF takes a lifelong approach to university access and participation.

***Recommendation 4: Investment in national graduate employability programs for students from underrepresented backgrounds.***

* **State and National Alternative Pathways.** Increasingly, universities are employing alternative methods to assess student’s preparedness for university, with the Mitchell Institute (2020) finding that just 26% of Australian students enter an undergraduate degree based on their ATAR. The most significant predictors of a young person’s ATAR is their socio-economic status, postcode and the school they attend. The ATAR inadvertently reinforces cycles of disadvantage – however, there is an absence of state-based or national alternative pathway and assessment measures – often resulting in students having to navigate diverse university-driven alternative entry programs, disadvantaging students who do not have a familial history of higher education access.

***Recommendation 5: Development of a national or (at minimum) state-based alternative assessment framework and university entry program.***

***Recommendation 6: Consideration of equity across lifetime of learning such as postgraduate studies, microcredential and short courses.***

* **Investment in National Scholarship / Study Support Scheme.** Once ATAR is taken into consideration, students from underrepresented backgrounds typically outperform their high SES peers once enrolled in higher education. However, completion rates are often impacted by external factors, such as financial stress, family and cultural obligations and distance from family and community. The current study support initiatives, including Abstudy, Austudy, Youth Allowance and the Tertiary Access Payment Scheme are complex, resulting in gaps of students being eligible for such support. We would strongly advocate for a review of the financial study support available to students, and call for the introduction of a national scholarship and study support scheme, with eligibility criteria aligned to the national higher education equity agenda and timely application and response times to influence student decision making to pursue a higher education pathway. Such a scheme could include, universal basic income for school leavers until age 25; and rental subsidies and free transport for students.

***Recommendation 7: Introduction of a National Scholarship and Study Support Scheme.***

In addition to the long term vision, there are some critical changes required to the Higher Education Participation and Partnership Program (HEPPP) in the short term, including:

* **Review of Student Equity Groups.** We were pleased to see the inclusion of Disability, alongside LSES, regional, rural and remote and Aboriginal and Torres Strait Islander groups in the Terms of Reference, and we would hope this will create a greater impetus for higher education institutions to invest into outreach, transition and engagement programs, as well as Universal Design for Learning, in addition to providing reasonable adjustments for students to participate in higher education. However, broad and general equity policy and programs will not address the specific impacts of different types of disability. Therefore the funding and policy arrangements must be designed in a way that enables Disability to be addressed independently of as well as a part of broader equity concerns. This should include consideration of extending the Nationally Consistent Collection of Data administrative criteria to the tertiary education sector to ensure that students with disability can retain appropriate and sufficient levels of adjustment and support as they move into post-secondary education. A joined up system of support across all levels of education will also align current practice with Australia’s commitments under the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD), institutional legislative obligations under the Disability Discrimination Act (DDA 1992), and foster a modern approach to social and ecological understandings of disability within the tertiary education sector which will contribute to achievement of the Education and Learning outcome and policy priorities identified in Australia’s Disability Strategy (2021 -2031).

***Recommendation 8: Develop a National Student Equity Strategy that is inclusive of students with disability, as well as providing additional targeted support.***

In 2018, a review of identified equity groups was conducted by the University of Queensland Australia (Tomaszewski et al. 2018). The review made recommendations to retain three equity groups (LSES, Indigenous and Disability), with some minor adjustments to the outstanding three equity groups (NESB reclassified to disadvantaged NESB; regional, rural and remote separated into Regional and Remote and tighten the WINTA definition to exclude fields of study in which women constitute close to half or more of the student population). In addition to this, the review also made a recommendation to introduce an indicator to capture multiple disadvantage. In addition to this work, the sector is shifting, with the need to ensure more inclusive definitions of disadvantage. By being explicit, often invisible cohorts of students fall through the cracks, such as Pasifika, refugees and students in care. In addition to this, institutional profiles are diverse and may require contextualised institutional approaches to meet of their students. Whilst we understand the need to address inequities of student groups at a national level, there is also a need for contextualised institutional approaches informed by an institutions enrolment profile.

***Recommendation 9: Revisit the recommendations from the Review of Identified Equity Groups (Tomaszewski et al., 2018) and make enhancement to enable institutions to cater for invisible cohorts of equity.***

***Recommendation 10: Legislate equity funding to provide medium to long-term commitment to institutions to enable the access, participation and success of students from targeted equity groups.***

* **Achieve equitable access to Widening Participation.** Whilst Australia has had dedicated Widening Participation programs since 2011, there are some areas, particularly in regional, rural and remote Australia that receive limited to no access to Widening Participation activities, and schools in metropolitan areas being over-serviced by universities. Whilst there is a role for universities in conducting outreach with communities, schools and vocational education providers, leveraging the RUC model, combined with state-based strategies on career development learning in schools, could provide an opportunity to develop regionally focused partnerships that enable every student to access both Widening Participation activities and effective and tailored career advice.

***Recommendation 11: Review the ‘Partnerships’ component of HEPPP, alongside state and nationally based career development learning programs, to develop a Widening Participation partnership model that supports every student.***

1. **The connection between the vocational education and training, and higher education systems.**

The introduction of the Widening Participation agenda in universities resulted in the privileging of higher education pathways over vocational education and training (VET) pathways, resulting in decreased participation in VET programs (Brett, 2018). A national student equity strategy should encompass the ecosystem of education systems, including early childhood, primary secondary, VET and higher education in order to address systemic disadvantage early. A closer connection between the VET and higher education sectors would:

* Create seamless financing options to enable students to navigate and make informed decisions about their post-secondary options;
* Create seamless pathways from VET to higher education, and higher education to VET, with students understanding how diverse educational experiences can enrich both their working and personal lives.

***Recommendation 12: Development of a National Student Equity Strategy for the tertiary education sector.***

**Further input and consultation on the Accord**

We would strongly encourage and support the Accord Panel engaging with both students and equity practitioners in the higher education sector on the development of the Accord throughout 2023. EPHEA would be happy to work with the panel to arrange opportunities to engage with these groups if this would be of interest.

Thank you for your time and if you have any questions, I’d be more than happy to discuss these with you.

Kind Regards,

Kylie Austin

President, Equity Practitioners in Higher Education Australasia (EPHEA)

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