



University of the
Sunshine Coast
Australia

Professor Helen Bartlett

Vice-Chancellor and President

19 December 2022

Professor Mary O'Kane AC

Chair

Australian Universities Accord Panel

Dear Professor O'Kane

The University of the Sunshine Coast (UniSC) welcomes the opportunity to provide the attached submission on the priority issues we would like to see considered as part of the Review of Australia's Higher Education System (the Accord).

UniSC looks forward to making further contributions to the Accord process throughout 2023.

If you would like to discuss UniSC's submission further, please contact Jason Mills, Head of Government Relations on [REDACTED] or [REDACTED].

Your sincerely

A handwritten signature in black ink that reads "Helen Bartlett".

Professor Helen Bartlett

Vice-Chancellor and President

Att. UniSC Submission on priority issues for the Review of Australia's Higher Education System

Submission on priority issues for the Review of Australia's Higher Education System

The University of the Sunshine Coast (UniSC) welcomes the opportunity to provide a submission to inform the priorities of the Review of Australia's Higher Education System which is being led by the Australian Universities Accord Panel.

UniSC acknowledges the strong fundamentals of Australia's higher education system, which has been built up over many years, including via successive reviews such as this one which have been undertaken by a range of esteemed people and governments. In particular we want to highlight the important and unique role that regional universities have played, and will continue to play, in meeting the education, research and community partnership needs of regional communities, especially those who are traditionally more disenfranchised from higher education and the lifelong benefits that it can provide.

UniSC would also like to acknowledge the initial reforms and funding commitments that the Federal Government has undertaken since the election in May 2022, as well as the various policy and program reviews it has initiated. These include hosting the Jobs and Skills Summit, delivering funding for an additional 20,000 Commonwealth Supported Places, initial changes to the Australian Research Council (ARC) National Interest Test, ongoing reviews of the ARC Act, migration system and the NDIS as well as a range of positive amendments to the Higher Education Act.

Within that broader policy context, UniSC continues to believe that the findings and recommendations of the 'Naphthine Review'¹ remain extremely relevant and the yet to be implemented recommendations should be given due consideration and priority as part of the Accord process.

1. Meeting Australia's knowledge and skills needs, now and in the future

UniSC strongly endorses the reference to 'quality education' in the description of this priority area. There is a disconnect between older and larger universities with a strong 'reputation' and the metrics for teaching quality and graduate employment outcomes of universities that are younger who may not have the same brand recognition. There is a critical need for teaching excellence, student satisfaction and graduate outcomes to be more widely recognised by governments, industry and students when considering measures of success in the higher education sector.

UniSC is justifiably proud of its consistently high ranking for teaching excellence and student satisfaction. We were ranked the top public university and second-best public university nationally in the latest QILT Student Experience Survey². We also note our significant improvement in graduate employment outcomes and the meaningful contribution this is having on meeting employment needs in our regions, particularly in areas of skills shortage such as nursing and teaching. This point is further evidenced in RUN universities generally where on average, seven out of 10 bachelor level graduates from RUN universities will live and work in the regions compared with only 24 per cent graduates from metropolitan universities³.

¹ <https://www.education.gov.au/access-and-participation/resources/national-regional-rural-and-remote-tertiary-education-strategy-final-report>

² [https://www.qilt.edu.au/surveys/student-experience-survey-\(ses\)#report](https://www.qilt.edu.au/surveys/student-experience-survey-(ses)#report)

³ <https://nousgroup.com/wp-content/uploads/2020/09/RUN-Summary-Report-final-compressed.pdf>

Our communities place a great deal of value in regional universities offering a wide range of courses and addressing regional issues and finding solutions through research partnerships with local industry, government and community organisations. We also make a significant economic contribution to our local regions as well as underpin their growth and prosperity by delivering their future workforce. It is critical for regional communities and students that regional universities remain comprehensive and are funded to be such. UniSC acknowledges that universities have different focuses across teaching and research, however in order to ensure Australia provides equal access for metropolitan and regional students, a differentiation model based on teaching or research only institutions will only further marginalise regional and remote communities from higher education. Any proposals that certain universities should be teaching only, or research only, should be rejected.

UniSC suggests that given its importance to Australia's domestic economy and international relations, higher education policy should be bipartisan like defence. It is too critical to our national security, sovereignty and economic growth to be politicised.

We also recommend that the Government, in collaboration with state governments and industry, consider further opportunities to deliver positive messages about the economic and social benefit of the higher education sector, including the contribution to nation building, global competitiveness and regional development.

2. Access and opportunity

UniSC welcomes the Government's focus on improving access and opportunity to higher education and we note that it supports both our existing mission statement – "to create opportunities for all" – and values – "advocate for equitable access to education and knowledge".

Of course all universities, particularly regional universities, have long been in the business of offering education opportunities to students from underrepresented backgrounds so this is not a new concept. We acknowledge however that participation and completion rates for equity groups and regional and remote students are not where they should be and that there is more work to do.

To that end, and being cognisant of the short-term Budget constraints, UniSC would nevertheless like to see proper consideration given to revisiting the demand driven model with a view to including regional and remote students as well as the priority equity groups (at a minimum including all Indigenous students, not just those from regional and remote locations), as well as further support for bridging courses. We know that the previous demand driven model in place from 2012 to 2017 drove significantly higher and faster undergraduate enrolments and worked to widen participation from key equity groups. For example, during that period Indigenous undergraduate student enrolments more than doubled (105 per cent), enrolments of undergraduate students with a disability increased by 123 per cent, enrolments of students from regional and remote areas increased by 50 per cent and enrolments from students from low SES backgrounds rose 66 per cent⁴.

However, given the traditionally higher attrition rates of equity group students, any expansion of the demand driven model to these groups would need to be accompanied by increased funding to allow institutions to deliver appropriate student support services to maximise completion rates. Given the many and varied reasons for equity group student attrition, UniSC does not support the setting of national or institutional completion targets tied to funding consequences. In addition, we continue to advocate for the removal of the 50 per cent fail rate measure within the existing Job Ready

⁴ <https://www.universitiesaustralia.edu.au/policy-submissions/diversity-equity/the-demand-driven-system/>

Graduates Package given this policy fundamentally conflicts with the Government's desire to drive greater access and opportunity for equity students who are more likely to fail subjects in the early years of their studies. This is particularly the case for students undertaking enabling or bridging courses, which is punishing the very students the Government wants to see more of. Conversely, at least at UniSC, if retained and suitably supported, these same students are then more likely to succeed at university than direct entry students.

UniSC would also like to see more federal and state government investment into new and existing programs aimed at increasing the employment outcomes of graduates from equity groups, which remain well below the non-equity group students. According to the 2021 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 per cent of students with a disability and 53 per cent of students who speak a language other than English are working full-time within four months post-graduation. These programs should also support international students who are willing and able to remain in Australia after graduation and seek employment given the additional barriers they face e.g. delayed employment, pay inequity compared to domestic graduates and often being forced to work in jobs unrelated to their qualification.

Amongst student equity groups, UniSC contends that students with a disability, including an increasing proportion who are suffering from mental health issues, are the most neglected from a funding perspective. This is occurring in an environment where students disclosing a disability are the fastest growing equity group in universities at 58.62 per cent growth from 2013 – 2019⁵. When you consider that almost 20 per cent of Australian school students disclosed a disability in 2020 and in 2019 only 7.6 per cent of university students disclosed a disability, it is clear universities will continue to see an upward trend in the number of disabled students, including with increasing mental health needs (i.e. in line with increasing community mental health rates). Given this, UniSC believes the Government should undertake an independent audit of higher education providers to quantify the financial investment being made in supporting students with a disability beyond the current funding arrangements, with a view to expanding the Higher Education Participation and Partnership Program (HEPPP) to include this equity group.

Accommodation availability and cost remains a significant challenge for many students who need or choose to relocate to study. In UniSC's regions, like most others around the country, accommodation has become one of the main inhibitors to students accepting an offer. This is particularly the case for international students. Therefore, through the lens of increasing access and opportunity, we believe the Accord panel should consider the role that all levels of government can play, in collaboration with the sector and other stakeholders, to address this significant challenge.

Like other universities, student scholarships play an important part in overcoming financial barriers for both coursework and research students. At UniSC, philanthropic support is also helping to cover the high costs of undertaking student placements, particularly teachers, in regional and remote locations. We believe government can play a stronger role in supporting the costs of regional and remote placements, particularly in areas of skill shortage.

⁵ <https://www.ncsehe.edu.au/data/national-data/>

3. Investment and affordability

UniSC welcomes the JRG review being incorporated into the Accord process and the focus on funding arrangements that can further extend our ability to provide quality education, research, infrastructure and employment outcomes to our local communities and the country.

UniSC is a case study of Australia's fastest growing regional university that is successfully addressing the Government's equity focus. However, without changes to funding trajectories, it will be hard for us to sustain that growth and our focus on equity students without additional funding for student support and infrastructure.

UniSC's consistently high student satisfaction rankings don't happen by accident. We invest significantly in supporting our students, particularly equity group students who make up a large proportion of our student body. These wrap around support services are costly and if Australia is to realise the ambition of increasing completion rates amongst equity group students, the Government needs to evolve funding programs such as the Higher Education Participation and Partnership Program (HEPPP). As noted earlier in this submission, UniSC argues there is a strong case for extending the HEPPP to include students with a disability.

While UniSC does not wish to duplicate the Regional Universities Network (RUN) submission, it is worth briefly reinforcing RUN's important point about current higher education policy settings and funding programs (teaching, research and infrastructure) favouring big institutions that service large markets in urban areas over smaller institutions operating in thinner markets i.e. the diseconomies of scale. If Australia is to avoid further marginalising regional and rural communities from higher education opportunities, it is critical that smaller, regional universities like UniSC are both recognised and appropriately funded so they can sustainably deliver, and indeed grow, the unique contributions they make in thinner population markets.

We would therefore specifically suggest the following areas for consideration:

- How to sustainably fund universities to successfully graduate equity group students, including those from regional / remote locations.
- How to fund the establishment and maintenance of physical infrastructure (teaching and research) in regional locations, noting the significant community co-benefits.
- How to recruit and retain academic and professional workforces in regional locations.

4. Governance, accountability and community

UniSC notes that Australia's higher education sector is already highly regulated and of course we acknowledge the importance of regulation in driving high standards and providing safeguards and opportunities for recourse when required.

However, we would argue that the administrative burden of operating in this highly regulated environment is already high, particularly for smaller institutions with less resources. Universities also self-regulate, including when it comes to matters such as student satisfaction and safety, and these institutional protections, and the costs involved, should be taken into account when governments are considering more black letter regulation which can be duplicative.

When it comes to workplace relations, UniSC contends that individual institutions remain best placed to consult with their workforce and unions on appropriate pay and conditions and enshrine these into enterprise agreements and other policies as appropriate.

Like other regional universities, the positive contribution we can make to our local communities is at the heart of every decision. In addition to the significant economic impact⁶ as a large employer and consumer of goods and services, our key contributions include the high number of graduates that stay on and work in the region after graduation, particularly in areas of critical skill shortages like nursing and teaching. We also work with our communities, local councils and businesses to deliver regionally relevant research and projects and of course our physical infrastructure is made available to the community in a variety of ways.

5. The connection between the vocational education and training and higher education systems

UniSC believes there are numerous opportunities to better integrate vocational education and training (VET) and higher education.

Further, we believe this work should focus on the important role that the schooling system plays in both preparing students for further learning but also creating clarity and excitement about how VET or higher education can support their chosen careers and life goals. While more challenging and possibly beyond the scope of this review, the increasing trend of organisations developing and delivering in-house training to their workforce, sometimes resulting in ‘company certifications / qualifications’ and the growing micro-credentials market requires consideration as to how they can be integrated more clearly into the broader education and training system.

This is not an exhaustive list and other stakeholders will provide additional ideas or variations on these, however with respect to VET and higher education integration, UniSC believes the Accord should consider the following topics as a priority:

- Co-location - The benefits of federal and state governments, along with the VET and higher education sector, investing in more integrated physical learning facilities. As a university that has two of our campuses co-located with TAFE QLD and our Sunshine Coast campus bookmarked by two schools, we already enjoy some of the more obvious benefits such as cost-sharing of infrastructure and services, along with student convenience.
- Clearer pathways – the complexity of both sectors, including in how training packages and qualifications are developed and delivered makes it challenging to provide clear and seamless pathways between VET and higher education and vice versa. This should include the role of VET in schools. Improved outcomes in this area would go a long way to uplifting post-school training and education participation rates.
- Dual sector – an examination of the experiences of dual sector universities would offer insights into some of the pressing regulatory and funding issues, and examples of innovative practice⁷.
- Dual awards – UniSC is already developing dual awards with TAFE QLD and believes this is an area that provides great potential for delivering more efficient learning outcomes for students.
- Regulation, accreditation and funding – the current VET and higher education regulatory environment, curriculum development and accreditation processes and funding models are incredibly complex. Bearing in mind the concurrent federal and state government VET reviews that are occurring across the country, an ambition of the Accord should be to achieve an improved level of harmonisation across the two sectors given the significant funding efficiencies to be gained, not to mention improved student experience and productivity uplift.

⁶ <https://nousgroup.com/wp-content/uploads/2020/09/RUN-Summary-Report-final-compressed.pdf>

⁷ <https://www.vu.edu.au/sites/default/files/reforming-post-secondary-education-australia.pdf>

6. Quality and sustainability

UniSC acknowledges the myriad challenges faced by students, staff, management and the government due to the impacts of the COVID-19 pandemic, some of which will continue into at least 2023. Further, we appreciate this impact has extended to our on-campus and near campus small businesses like cafes and other service providers, as well as in a range of adverse ways across our local communities.

We specifically note the challenges faced by many students and staff who had to pivot for the first time to online learning. However UniSC also believes that this forced change will have many silver linings for the sector. For example, at UniSC it has accelerated our adoption of quality online teaching and assessment methodologies and tools, alongside more choice and flexibility for students to experience a 'blended' mode of learning and teaching. While not without their challenges, these changes are already benefiting many of our students and staff.

It is also clear that the pandemic provided many learning opportunities for federal and state governments, particularly in terms of how they can and should support the higher education sector during such a crisis. The provision of transitional funding was obviously a positive outcome, however the same could not be said for how the government treated our valued international students.

UniSC believes there are several key priorities to be addressed within this area of focus, including:

- How to measure and sustainably fund the permanent change to blended learning methods at universities, recognising that despite some perceptions, the introduction of full or partial online learning is not cheaper to deliver.
- How to measure and sustainably fund the additional support services needed to provide equity group students with a satisfying and successful higher education experience, including measures needed to increase completion rates and graduate employment outcomes. Given the Government's intention to increase access and opportunity for all, which UniSC is fully supportive of, service delivery costs will increase.
- How to further improve the end-to-end Australian education experience for international students. We recognise the initial positive response from the Government in this area, including from a country reputation perspective through to dealing with the significant backlog of student visas. However there remain many other opportunities, including developing a more competitive Australian higher education value proposition to regain global market share and ensuring regional communities continue to benefit from international students through appropriate incentives to study at regional universities.
- How to leverage and implement the important actions in the *Australian Strategy for International Education 2021 – 2030* which was developed through an extensive consultation process with multiple stakeholders.

7. Delivering new knowledge, innovation and capability

UniSC acknowledges the Panel's intention to 'synchronise' with the ongoing review of the ARC Act and notes that we have provided a submission to that review and therefore do not propose to duplicate our comments in this response.

We would encourage the Panel to also consider and take in account the ongoing reviews of Australia's Science and Research Priorities and National Science Statement.

From an opportunity perspective, UniSC would also like to see more alignment and integration of federal and state government funding to universities and other research institutions across both basic and applied research. There is significant duplication of effort and inefficiencies in the current federal / state research funding approach. Both levels of government also need to recognise the full cost of research when developing funding programs.

We endorse the importance of further industry collaboration and partnerships to drive both innovation and commercialisation of research. UniSC is active in this area and we acknowledge our existing industry partners for their support, however as a regional university operating in smaller communities, we are challenged with having few medium to large businesses who generally have more capacity to engage on, and fund, research priorities and projects. We would welcome the Accord process considering how governments can further assist regional universities with overcoming this challenge, recognising that research impact in regional communities can be measured in many ways, not just the ability to commercialise research outcomes.

UniSC, like other regional universities who operate in thin markets, is often challenged to fund the necessary infrastructure needed to deliver new research opportunities. We encourage the Panel to consider how the Government can work with the regional university sector to address this issue, for example by re-establishing a dedicated higher education infrastructure fund and including a dedicated amount for regional universities.