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Australian Universities Accord Panel

Universities Accord Discussion Paper: Submission from Edith Cowan University

Thank you for providing an opportunity for Edith Cowan University (ECU) to provide further input to the Australian Universities Accord Review.

Summary of recommendations

Job-Ready Graduates package (item 3.9.3):

- Introduce a flat student contribution rate.
- Vary Commonwealth contribution amounts by discipline to cover the full costs of teaching.
- Extend transition funding and suspend performance-contingent funding through 2023 and 2024.

Research quality (3.7.2)

- Establish a full economic costing model for university research.
- Reinstate a separate funding pool for educational teaching and learning research.
- Replace Excellence in Research for Australia with a transparent, automated system of assessment.

Collaboration with industry (3.2.4)

- Work with state and territory governments to improve placement availability in areas of skills shortage.
- Promote the benefits of work-integrated learning to businesses and organisations.
- Provide financial incentives to organisations to host work-integrated learning students.
- Consider regional and remote placement payment schemes.
- Review Commonwealth Government support for students while on work-integrated learning placements.
- Collaborate with professional bodies and universities to improve flexibility in mandatory work placements.

Academic preparedness (3.5.1)

- Develop a new nationally recognised University Certificate in Higher Education.
- Remove the low completion rate restrictions on access to Commonwealth support.

Lifelong learning (3.2.5)

- Review the National Microcredentials Framework.
- Work with professional accreditation bodies to improve timeliness of approvals.
- Reduce regulation for non-credit-bearing microcredentials.
- Grow confidence in microcredentials for employers and businesses.

Regulation and governance (3.6.2)

- Trust the TEQSA accreditation process, and minimise political interventions in the university sector.
- Consolidate and simplify multiple funding streams.
- Streamline administrative and reporting obligations to allow universities to focus on teaching and research.

Job-Ready Graduates (JRG) package (3.9.3)

Q49   Which aspects of the JRG package should be altered, and which should be retained?

The changes introduced to student contribution rates under the Job-Ready Graduates package have proven ineffective at manipulating demand for specific disciplines. Intrinsic motivation (internal factors such as personal interest, finding pleasure in learning) leads to higher success than extrinsic motivation (external factors, e.g. cost, pressure from family). Students are more likely to complete their course when they find joy in their study. As such, the "price-blindness" encouraged by HECS-HELP is one of its strengths. Personal desire to find a job and success in their chosen field motivates students more than a discount.

While contribution rate changes have had little impact on student decisions, they have provided disincentives to universities to expand their offerings in the "national priority" disciplines with reduced contributions. Universities consider all their disciplines valuable to society and to economic growth, including those deemed "not job-relevant" in JRG such as the humanities and social sciences. However, external funding affects the resources available to each discipline within universities. For disciplines with reduced contributions, teaching costs were not matched by allocated funds, resulting in fewer resources for teaching, innovation, and growth.

Considering the value of all higher education to Australia's culture and economy, and to the professional and personal growth of students and graduates, ECU recommends a flat rate student contribution across all disciplines. This separates the student contribution rate from political whims, expected earnings that may not eventuate, and teaching delivery costs. This is a philosophical change from the current position, reverting to the solo student contribution rate from when HECS was first introduced. It is a return to the idea that students should follow their interests, since this provides the greatest benefit to communities, businesses, and individuals. Passion fuels curiosity, sparks creativity, and prompts innovation.

A comprehensive framework would then need to be developed to meet the total costs of teaching in each discipline with varying Commonwealth contribution amounts. This would form the basis of funding universities for student places. It would remove all undesirable incentives and disincentives regarding the fields of study offered, and the resourcing for each. Fair funding across each discipline would also contribute to diversity within the sector, as universities would be able to offer disciplines based on their institution's strengths and mission rather than financial imperatives.

During this period of ongoing funding uncertainty, ECU recommends that transition funding is extended into 2024, and performance-contingent funding adjustments be suspended in 2023 and 2024.

Refer to *Academic preparedness (3.5.1)* for additional comments regarding JRG's "low completion rate" measure.

Recommendations – Q49

- Introduce a flat student contribution rate.

- Vary Commonwealth contribution amounts by discipline to cover the full costs of teaching.

- Extend transition funding and suspend performance-contingent funding through 2023 and 2024.

Research quality (3.7.2)

Q41   How should research quality be prioritised and supported most effectively over the next decade?

Australian university research is responsible for innovations that improve human health, environment, and society. For Australia to maintain its high national research quality and productivity, university research must be funded sustainably. Competitive research grants

and block grant funding do not meet the full cost of research, and universities are increasingly relying on external funders, mostly industry partners, and internal cross-subsidisation from student revenue, to fund their research.

As the COVID-19 pandemic demonstrated, international student fee income is not necessarily stable or guaranteed, which can disrupt research activity. Research is often a slow, steady endeavour, which requires a long-term funding commitment – for example, it is difficult to rapidly respond to changing market conditions part-way through a multi-year study.

Universities increasingly partner with industry to conduct collaborative research and contribute towards to cost of their research. Such partnerships are beneficial for the translation of research and higher degree by research training. However, industry funding can introduce risks to research quality, through influencing the research agenda, and affecting which results are published.[1] Universities have extensive governance mechanisms in place to reduce the risk, but it remains inherent to commercial funding. Additionally, increased reliance on attracting research income detracts from researcher-led and curiosity-driven research. Academics are increasingly required to bring in external funding if a university is to continue to invest in their research. Australia needs to consider the extent to which university research should be driven by academics, or driven by industry and government needs.

ECU recommends that the Government establishes a full costing model for university research that works towards enhanced funding sustainability and assurance for the sector. This model must consider the varying capacities of universities to cross-subsidise research costs, and provide an equitable approach to research funding. Such a model will help protect the research workforce, particularly early career researchers, from research funding shocks.

Restoration of funding for scholarship of teaching and learning – i.e. research that improves and strengthens higher education itself – is also vital. The disestablishment of the Australian Learning and Teaching Council and the Office of Learning and Teaching has meant that educational researchers are competing for Australian Research Council (ARC) funding, where research and best practice in teaching is not a high priority.

ECU welcomes the development of a modern, data-driven approach to assessing research quality as part of the ARC reforms. Replacing the Excellence in Research for Australia (ERA) process with an automated assessment system would allow access to a continuously available set of performance data, while reducing the administrative burden on the ARC and universities. Increasing transparency in the assessment methodology, and improving consistency between disciplines, will promote trust in the process and better reflect Australian universities' research excellence.

Recommendations – Q41

- Establish a full economic costing model for university research.

- Reinstate a separate funding pool for educational teaching and learning research.

- Replace Excellence in Research for Australia with a transparent, automated system of assessment.

Collaboration with industry (3.2.4)

Q14   How should placement arrangements and work-integrated learning (WIL) in higher education change in the decades ahead?

As a university that prepares among the nation's largest cohorts of teachers and nurses each year, ECU has experienced challenges delivering placements and work-integrated learning in

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1   For more information: Fabbri, A., Lai, A., Grundy, Q., & Bero, L. A. (2018). The influence of industry sponsorship on the research agenda: A scoping review. *American Journal of Public Health, 108*(11), e9-e16. https://doi.org/10.2105/AJPH.2018.304677; Bero, L. (2019, October 3). When big companies fund academic research, the truth often comes last. *The Conversation.* https://theconversation.com/when-big-companies-fund-academic-research-the-truth-often-comes-last-119164

areas of skill shortages. Increased cost pressures on students and universities to meet placement requirements limits the number of graduates trained for careers in nursing, allied health, and teaching. The scale of these courses at ECU directly impacts the cost and availability of placements, plus the complexity of coordinating with employers and workplaces. This is exacerbated for students in regional and rural areas.

Public funding for supervision of nursing and allied health students is limited.[2] Hospitals are increasingly passing on the cost to universities, and, coupled with a net reduction in student fees for these disciplines, universities must make difficult decisions to manage these costs. Current pressures on the health system restrict the number of staff available on-site to coordinate and supervise health and nursing students. Teaching placements are also constrained by availability of places. Schools are not required to accept pre-service teachers and agreements must be negotiated with each school individually. However, the community, governments, and employers benefit from the continued availability of new graduates. The Commonwealth Government could work with state and territory governments to directly address the barriers to providing more work placements.

Placements for other courses are also limited by availability. Some employers view placement students as free or cheap labour, and others as a burden. Neither of these perspectives are fair or supportive of a positive student experience during the formative stages of a future career. The Commonwealth Government should better support promotion of the benefits of hosting work-integrated learning students, which include simplifying recruitment by trialling potential staff, developing the mentoring and supervisory skills of current staff, welcoming people who bring fresh ideas and enthusiasm to their organisation, and the satisfaction of investing in their future workforce.

Employers should contribute financially to the preparation of their workforce pipeline, particularly where accreditation or registration explicitly require lengthy work placements. Employers used to provide on-the-job training to skill new staff, but the costs have been transferred to students and universities. These responsibilities should be readjusted, supported by Commonwealth Government financial incentives to businesses to offer work-integrated learning placements (e.g. as has been done in Canada[3]). Incentives would greatly assist small-and-medium enterprises.

Some students experience financial difficulties caused by work placements, particularly where placements are mandatory and lengthy. ECU has a large proportion of mature-age students with financial and caring obligations, where the practicalities of unpaid work placements can hinder course completion. A Commonwealth Government scheme of support payments for all students undertaking placements of a certain length, mandatory placements, and/or placements in areas of national priority should be considered. Alternatively, vocational placements could be incorporated into the *Fair Work Act*, rather than exempted, so students receive payment from employers. This may require a transition period with financial incentives for employers from the Commonwealth Government.

Regional placements typically involve higher accommodation and travel costs. More direct financial support for students could be achieved through regional and remote placement schemes funded by Commonwealth Government and regional employers.

Students would also benefit from increased flexibility for work placements mandated by professional bodies. Part-time and online placements would grant students with financial constraints, caring responsibilities, and/or disability, and students in regional or remote areas, equivalent access to the practical experience that is so important to employers and graduates. Part-time placements in large disciplines like teaching and nursing would help part-time students balance study and other responsibilities while gaining valuable practical experience. For disciplines where working from home is becoming common, or expected, online placements provide a comparable real-world experience, regardless of location. However, both part-time and online work placements have little support from professional bodies. For

2 Brown, D. (2022, September 6). Clinical placement costs cap nursing student numbers. *Campus Morning Mail*. https://campusmorningmail.com.au/news/clinical-placement-costs-cap-nursing-student-numbers/

3 Government of Canada. (n.d.). *Student Work Placement Program.* https://www.canada.ca/en/employment-social-development/programs/student-work-placement-program.html

equity reasons, this needs to change. The Commonwealth Government could work with universities and professional bodies to improve flexibility in this space.

Recommendations – Q14

- Work with state and territory governments to improve placement availability in areas of skills shortage.

- Review Commonwealth Government support for students while on work-integrated learning placements.

- Promote the benefits of work-integrated learning to businesses and organisations.

- Provide financial incentives to organisations to host work-integrated learning students.

- Consider regional and remote placement payment schemes.

- Collaborate with professional bodies and universities to improve flexibility in mandatory work placements.

Academic preparedness (3.5.1)

Q28   What is needed to increase the number of people from under-represented groups applying to and prepared for higher education, both from school and from other pathways?

Q29   What changes in provider practices and offerings are necessary to ensure all potential students can succeed in their chosen area of study?

Enabling courses are a major pathway to university for students from equity groups, and equity group students who enter a bachelor degree after an enabling course typically achieve better outcomes than those admitted via other sub-bachelor pathways.[4] Enabling courses are defined in the *Higher Education Support Act* as courses that grant a graduate entry to a higher education award course. Specifically, an enabling course cannot itself *be* a higher education award. As a result, unlike AQF-recognised higher education awards, enabling courses offer limited portability between institutions.

A supplementary, nationally recognised University Certificate in Higher Education could provide its graduates access to undergraduate programs across Australia. A consortium of universities and other providers, who have demonstrated best practice experience and expertise in enabling courses, could be funded to design and deliver the certificate award at enabling level. A shared program is achievable due to the complementary learning outcomes and standards.[5] This course would provide under-represented students, and other enabling course graduates, more choice when continuing onto bachelor study.

In addition, the Job-Ready Graduates (JRG) "low completion rate" measures should be removed for all course levels. After attempting at least eight units in a bachelor degree, or four units in an enabling course, students who failed more than half of their units must pay full-fees upfront to continue. Many students change courses or providers, take a break from study, or drop out to avoid this unplanned financial burden, disrupting their study when students most need support. This element of JRG disproportionately affects students from under-represented equity groups. At ECU, almost 90 per cent of students impacted to date were enrolled in an enabling course. Over 20 per cent of all ECU commencing enabling students in the past 12 months were affected, despite a deliberate focus on identifying non-participating students and withdrawing them before census date. Enabling courses are intended to prepare and welcome

4   Pitman, T., Trinidad, S., Devlin, M., Harvey, A., Brett, M., & McKay, J. (2016). *Pathways to higher education: The efficacy of enabling and sub-bachelor pathways for disadvantaged students.* National Centre for Student Equity in Higher Education (NCSEHE). https://www.ncsehe.edu.au/publications/pathways-to-higher-education-the-efficacy-of-enabling-and-sub-bachelor-pathways-for-disadvantaged-students/

5   Syme, S., Davis, C., & Cook, C. (2021). Benchmarking Australian enabling programmes: Assuring quality, comparability and transparency. *Assessment & Evaluation in Higher Education, 46*(4), 572-585. https://doi.org/10.1080/02602938.2020.1804825

under-represented students to higher education. It takes time for some enabling students to reach the level of academic preparedness required for successful tertiary study, and punishing them for their persistence in working towards this goal is counterproductive.

Recommendations – Q28 & Q29

- Develop a new nationally recognised University Certificate in Higher Education.

- Remove the low completion rate restrictions on access to Commonwealth support.

Lifelong learning (3.2.5)

Q15   What changes are needed to grow a culture of lifelong learning in Australia?

Q16   What practical barriers are inhibiting lifelong learning, and how can they be fixed?

For many Australians, lifelong learning includes a range of formal and informal post-secondary education. Universities have a clear role to play, based on decades of experience in educating mature-age students, assurance of learning, flexible and online delivery, and responding to industry requirements. Shorter study options are needed, both to complement, and as an entry point to, traditional higher education courses. The *National Microcredentials Framework* set out a cohesive definition and criteria for microcredentials in the Australian context in 2021.

It is timely to review this Framework, as anticipated by the Microcredentials Working Group. This review should consider refinements like additional classifications for capabilities, and further differentiation between non-credit-bearing microcredentials and short courses.

To ensure Australia's ongoing competitiveness in this space, the Commonwealth Government should work with professional accreditation bodies to improve the timeliness of recognising new microcredentials. Professional bodies, industry, and the sector itself currently have limited confidence in microcredentials – this also requires work to address.

Where microcredentials are non-credit-bearing, and therefore do not fall under the *Australian Qualifications Framework* (AQF) and *Higher Education Standards Framework*, the Commonwealth Government should reduce its oversight and regulation to ensure Australian providers can respond quickly to emerging market and industry needs. Microcredentials should not be added to the AQF. If tied to an AQF level, microcredentials will not be flexible enough to fulfil the Framework's requirements or achieve its intended outcomes, and will also be unable to meet the wide range of training needed by individuals and industry.

According to NCVER's 2021 survey, 52 per cent of employers used unaccredited training to train their employees, with 27 per cent of those not exploring whether similar nationally recognised training was available.[6] It is unlikely that businesses and prospective students have subsequently started to use MicroCred Seeker. The Commonwealth Government needs to raise awareness of the value and purpose of microcredentials among employers and individuals looking to upskill or reskill, beyond the MicroCred Seeker platform.

Recommendations – Q15 & Q16

- Review the National Microcredentials Framework.

- Work with professional accreditation bodies to improve timeliness of approvals.

- Reduce regulation for non-credit-bearing microcredentials.

- Grow confidence in microcredentials for employers and businesses.

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6   National Centre for Vocational Education Research (NCVER). (2021). *Employers' use and views of the VET system 2021*. https://www.ncver.edu.au/research-and-statistics/publications/all-publications/employers-use-and-views-of-the-vet-system-2021

Regulation and governance (3.6.2)

Q36 What regulatory and governance reforms would enable the higher education sector to better meet contemporary demands?

The Commonwealth Government desires a strong, equitable higher education system and as such, attempts to influence universities through legislation and funding levers are understandable. However, there are already philosophical and economic imperatives for universities to meet the expectations of students, industry, governments, academia, and the broader community. For example, universities are already obligated to focus on student success and equity through legislation like the *Higher Education Standards Framework*, and the requirements of accreditation bodies like the Tertiary Education Quality and Standards Agency (TEQSA).

Well-intentioned Government intervention is undesirable due to the administrative burden and unintended consequences introduced with each change, e.g. reducing the resources available to invest in science education via JRG, or requiring universities to undertake complex application, acquittal, and/or reporting processes for multiple pools of funding like performance-based funding, 20,000 equity Commonwealth-supported places, National Priorities and Industry Linkage Fund (NPILF), Higher Education Participation and Partnerships Program (HEPPP), National Priorities Pool Program (NPPP), Indigenous Student Success Program (ISSP), and so on. TEQSA can address issues in the sector via its accreditation process, and funding does not require so much segmentation and paperwork to achieve the Government's desired outcomes.

Universities are well-governed, low-risk institutions that share the Government's goals for higher education: a successful and sustainable Australian tertiary education sector, positive and supportive learning environments for all students, institutional diversity and student choice, innovative research that contributes to human knowledge and economic and cultural growth, a well-prepared and agile workforce for the future, a safe and healthy environment for students and staff, and to address societal inequities and environmental issues. Universities require policy and funding stability, and streamlined administrative and reporting requirements, to achieve these shared goals.

Recommendations – Q36

- Trust the TEQSA accreditation process, and minimise political interventions in the university sector.

- Consolidate and simplify funding streams.

- Streamline administrative and reporting obligations to allow universities to focus on teaching and research.

Further information

If you require further information or clarification, please contact Professor Arshad Omari, Senior Deputy Vice-Chancellor by email: a.omari@ecu.edu.au or by telephone: (08) 6304 2526.

Yours sincerely

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