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Higher Education Division
Australian Government Department of Education

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

Thank you for the opportunity to respond to the Australian Universities Accord Panel Discussion Paper.

The Equity Practitioners in Higher Education Australasia (EPHEA) submission outlined below has been informed by significant consultation with higher education practitioners in student and staff facing equity, diversity and inclusion roles from across the sector. EPHEA represents over 800 members currently working in higher education, and presents information below on ‘what works’ from a practice-based lens in increasing equity outcomes in higher education.

1. Equity Groups and Targets

Since the Bradley Review was released in 2008, some progress has been made in increasing participation in higher education from underrepresented equity cohorts (as per the table below).

Table 1: Changes in Participation Rate between 2007 to 2021.

Target Equity Group	2007 Participation Rate %	2017 Participation Rate %	2021 Participation Rate %
Low SES	15.0%	17.07%	16.61%
Indigenous	1.3%	1.83%	2.1%
Regional / Rural	18.1%	20.26%	18.06%
Remote	1.1%	0.81%	0.83%
Non-English Speaking Background ¹	3.8%	3.58%	3.43%
Students with Disabilities	4.1%	6.82%	9.66%

However, in order to deliver an Australian higher education system that “*delivers equal access to higher education for all, irrespective of location, financial circumstance, cultural background, gender or other factors*” (Australian Universities Accord Panel, 2023), more ambitious targets for underrepresented groups must be set.

Recommendation 1

Creation of a National Student Equity Strategy across the lifetime of learning that encompasses the recommendations that ensue as part of this response.

¹ While Non-English Speaking Background is the descriptor used by the federal government to gather data on this cohort, it has been critiqued for its ambiguous scope. We propose the term Culturally and Linguistically Marginalised Migrant and/or Refugee students (CALMMR) to capture a group of domestic students who are educationally disadvantaged by the linguistic and cultural/ systemic unfamiliarity resulting from their migration journeys, and especially for students with lived experience of forced migration

Recommendation 2

National participation targets for higher education are set that reflect population parity, and therefore are:

- 3.2% Aboriginal and Torres Strait Islander participation
- 25% participation of students from low socio-economic backgrounds
- 26% participation of students from regional and rural areas
- 1.1% participation of students from remote areas
- 18% participation of people with disability.
- 21% of students from Culturally and Linguistically Marginalised Migrant and/or Refugee students (CALMMR).

There is a growing recognition amongst equity practitioners of cumulative impact of compound disadvantage factors, such as low SES status and disability, or low SES status and Indigeneity. In addition to this, there is also recognition amongst equity practitioners regarding 'invisible equity cohorts' with risk factors that impact negatively on accessing and successfully participating in higher education, including LGBTIQ+ students, students from Pasifika backgrounds, students who have been in care (approx. 1% access higher education), CALMMR students and students with no parental experience of higher education.

In 2018, a review of identified equity groups was conducted by the University of Queensland Australia (Tomaszewski et al. 2018). The review 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 now recognised. Institutional profiles are diverse and may require contextualised approaches to meet the needs 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 institution's enrolment profile. The United Kingdom's Higher Education and Widening Participation policy has begun to explore and recognise these additional [risk factors](#).

Recommendation 3

Expand the equity groups that are targeted at an Australian Higher Education policy level to contribute to a diverse and inclusive higher education system, including:

- Aboriginal and Torres Strait Islander students
- Students from low socio-economic backgrounds
- Students from regional and rural areas
- Students from remote areas
- Students with disability
- Culturally and Linguistically Marginalised Migrant and/or Refugee students (CALMMR)
- LGBTIQ+ students
- Care leavers
- Students with no familial experience of higher education (first in family).

Develop more sophisticated understanding of equity by identifying key risk factors and cumulative disadvantages that further impact these student groups accessing higher education.

2. Funding

The Higher Education Participation and Partnerships Program (HEPPP) – when it was first introduced was designed to provide funding to assist universities listed in Table A of the Higher Education Support Act 2003 to undertake activities and implement strategies that improve access to undergraduate courses for people from low socio-economic backgrounds, as well as improving the retention and completion rates of those students. The Higher Education Participation and Partnership Funding allocation is currently \$145,194,281.00. It has never reached the amount recommended in the Bradley Review, which was originally proposed as 4% of the Teaching and Learning Base Funding Grant. HEPPP funding was cut in the 2011–12 Budget and 2016–17 Budget and now sits at approximately **1.8 per cent** of CGS (including enabling and regional loadings). These cuts have undermined the vision and targets aspired for in Bradley Review.

HEPPP funding has declined despite increases in equity student participation. Students from diverse equity backgrounds bring rich knowledge, skills, cultures and experiences to our higher education system, however, students from equity backgrounds may require additional financial support, activities that increase exposure to social networks and post-university employment opportunities, and for some groups of students increased academic support.

In addition to this, Universities also receive funding from the Indigenous Student Success Program (ISSP) and the Disability Support Fund (DSF). However, the current parameters for both of these funding programs do not support outreach and widening participation activities for these cohorts. The Bradley Review recommendation of \$20 million of funding for the Disability Support Fund in 2008 was never implemented, and funding has not increased in recent years, despite the increases of students with disability accessing higher education. Whilst the Disability Support Fund provides funding for institutions to support high needs students, further incentives for institutions to fund proactive programs for students with disability is required. Support for upskilling of the tertiary education sector workforce in areas such as disability awareness, accessible ICT procurement, and Universal Design for Learning is readily achievable by increasing investment in and leveraging existing assets such as the Australian Disability Clearinghouse on Education and Training.

The Higher Education Participation and Partnership Program has been a powerful vehicle within higher education institutions in raising the profile of student equity, as well as enabling accountability towards the national higher education equity agenda. However, the current model of HEPPP funding presents challenges in the following ways:

- Tied partnership funding was abolished in 2014 and universities have funded any partnership activities through their general institutional HEPPP allocation since 2015. Outreach and widening participation activities require significant, long-term investment and by embedding Outreach funding within the broader university HEPPP allocation, this leaves universities the discretion whether or not to engage in outreach activity, and also to determine the scale and reach of their activity.
- The current model of funding incentivises Universities to increase the proportion of students from underrepresented backgrounds to their own institutions, by providing universities with funding based on the number of students enrolled at their institution.
- 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). As such, there needs to be a focus on incentivising universities to support students to progress or complete their higher education qualifications or subsequently gain employment.

Recommendation 4

Review the Higher Education Participation and Partnership Program with a view to:

- Delivering on the Bradley Review's recommendation in relation to equity funding by increasing the proportion of the Teaching and Learning Base Grant allocated to the Higher Education Participation and Partnership fund to 4%
- Establishing HEPPP as a legislated equity block grant that Universities can rely upon and shift away from short term funding.
- Establishing a dedicated national 'Partnership Fund' that provides funding to all Universities to ensure shared responsibility for widening participation and to work collaboratively and in a nationally coordinated way to deliver outreach and widening participation activities to school and non-school leavers.
- Funding universities on the basis of how well they support students from underrepresented backgrounds to progress and complete their degrees and subsequently, gain employment.

Recommendation 5

- Increase the funding of the Disability Support Fund and the Indigenous Student Success Program to incentivise higher education institutions to undertake holistic strategies to improve access and participation for these student groups across the student lifecycle.

3. Increasing access for school and non-school leavers

Demand Driven Funding (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 6

Reintroduce demand driven funding, specifically for students from the following groups where there are demonstrated characteristics of adversity to debt and low participation in higher education:

- Students from low socio-economic backgrounds (both in metropolitan and regional and rural areas)
- Students from remote areas
- Aboriginal and Torres Strait Islander students
- Students with disability
- Culturally and Linguistically Marginalised Migrant and/or Refugee students (CALMMR)
- Students from care leaver backgrounds.

Enabling education is a proven strategy to increase access and assure students' skills and preparedness for higher education success (Pitman, 2016). Equity students who enter university via enabling programs generally experience better first-year retention rates than those entering via most other sub-bachelor pathways (Pitman, 2016). In Australia, more people hold a Certificate III qualification or lower (51.2% in 2021) than those people who hold a higher education degree (26.3% in 2021). There is a need to invest in pathways for student cohorts who do not hold entry level qualifications into higher education. In many areas in Australia, enabling programs come at a high tuition cost for students who are largely debt adverse. Universities with large, free enabling pathways to higher education, including University of Newcastle, University of South Australia and Western Sydney outperform all others in terms of the share of low SES students they enrol, as well as their retention and completion rates, demonstrating the value of sophisticated enabling programs to increased access and participation for students from underrepresented groups.

The majority of institutional widening participation activities focus on school leavers. However, to achieve significant growth in participation of equity group students, the sector also needs to reach out more effectively to non-school leavers to enable aspirations for further education and training post a Certificate III qualification. The HESP 2017, (Recommendation 3) identified that there was a "lack of university outreach programs for the non-school cohort" (2017, 18).

Recommendation 7

Increase funding and CSP Enabling places to ensure all Australian Universities can develop sophisticated enabling programs so that underrepresented students have access to free pathways into higher education.

Recommendation 8

Provide Commonwealth support for people seeking asylum and migrants – particularly those who have qualifications from elsewhere, albeit not recognised in Australia or hard to evidence due to displacement

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-served by universities. Whilst there is a role for universities in conducting outreach with communities, schools and vocational education providers, leveraging the Regional Universities Centre (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.

In terms of 'what works' the following should be considered in the development of a National Widening Participation strategy:

1. Long term, sustained engagement with students across the lifecycle (from high school and into their post-secondary studies) – Example of best practice are identified through the [National Centre for Student Equity in Higher Education](#).



2. Strength-based approaches that celebrate equity cohorts and the diversity that they bring to higher education institutions - [First Generation Program, Manchester Metropolitan University](#).
3. National widening participation programs that encourage collaboration amongst universities – [Scotland Widening Participation Program](#) and [UniConnect, United Kingdom](#).
4. Embedded Career Advice as part of Widening Participation programs – [Queensland University of Technology Widening Participation Programs](#).

In addition to this, there is evidence to suggest that school students are not being provided with effective career advice (O’Shea et al., 2022). Every higher education institution should ensure that their students are given the opportunity for career planning and course advice prior to entry to the institution and as they require it throughout their studies. More work could and should be done to safeguard careers and employment advising and outcomes, including employability outcomes, for equity group students generally over the student life stages and specifically for distinct cohorts. Recent advice in this regard has been provided in a 2022 NCSEHE Report – Best-practice career education for students from low socioeconomic status backgrounds.

Recommendation 9

Development of a national widening participation program and strategy, which enables every underrepresented student to have access to Widening Participation, through strong collaboration amongst schools, universities, vocational education providers and community groups – and ensures that every student has access to effective career advice.

4. How can governments, institutions and employers assist students, widen opportunities and remove barriers to higher education?

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 (National Skills Commission, 2022).

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 refugees 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.

In addition to this, whilst there has been strong alignment between universities and employability with the introduction of WIL and industry engagement over recent years, we need to provide



students with tangible opportunities to 'earn while they learn' through meaningful employment in their discipline areas. This will not only address issues around the cost of higher education participation, including living expenses, but also provide authentic learning opportunities for students that can provide opportunities to put their degree learnings into practice. In many schools across Australia, in excess of 65% of students are still going directly into employment after school and are not accessing higher or vocational education. By presenting students with a 'packaged' opportunity of further learning and employment could alleviate fears around the costs of higher education and provide students with the knowledge and skills to be successful in their studies. Companies such as [PwC](#), [Westpac](#), and [Bluescope](#) are successful examples of companies that offer traineeships to students to undertake a significant employment opportunity while they study. There is a need to further scale such opportunities, target underrepresented groups of students and increase the awareness of these opportunities amongst underrepresented student cohorts.

Recommendation 10

Invest in national graduate employability programs for underrepresented backgrounds, such as career trackers and career seekers, as well as national Work Integrated Learning (WIL) grants to enable students from underrepresented groups to engage in WIL.

Recommendation 11

Create a national student facing platform for industry to promote traineeships to students from underrepresented backgrounds.

5. How can the costs of participation, including living expenses, be most effectively alleviated?

Once ATAR is taken into consideration, students from underrepresented backgrounds typically outperform their high SES peers, in terms of GPA, 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. The 'full-time' and 'part-time' study requirements, significantly disadvantage students from equity backgrounds, as well as non-school leavers who are often having to work to provide for their families in addition to study.

Recommendation 12

Undertake a Review into Student Financial Assistance, with consideration given to effective income support (not loans) provided to students by the Commonwealth, targeted through means testing for students who demonstrate financial hardship. The income support should be consistent, predictable and appropriate to the student level of need, and available to both part-time and full-time students.

Students who receive an equity scholarship are more likely to be retained in their higher education studies, with students frequently reporting that it reduces their stress levels. Scholarships provide students with the opportunity with more time to study, so that they could reduce their hours in paid employment. However, scholarships are often only accessible to a very small proportion of the student population.

Recommendation 13

Expand the Tertiary Access Payment scheme to all targeted equity groups to access higher education, by creating a National Scholarship Program. This would also include reviewing the timing and response times to align with university offer rounds to influence student decision making to pursue a higher education pathway.

6. How can best practice learning and teaching for students from under-represented groups be embedded across the higher education system, including the use of remote learning?

HEPPP has been very successful in driving institutions to develop targeted programs and initiatives for enrolled students, however these initiatives are often ‘band aiding’ underpinning issues with how institutions deliver teaching and learning – equity needs to be embedded in all institutional practices to enable every student to succeed in their chosen area of study. Universal Design for Learning, transition pedagogy, and the enablers of these approaches such as digital and physical accessibility, can assist in achieving this.

Universal Design when applied to learning design enables inclusive curriculum design, development and delivery. It embraces learner variability, designs for it and reduces barriers to learning; creating a greater sense of belonging. The Federal Government has funded the Australian Disability Clearinghouse on Education and Training (ADCET) to develop [resources](#) to support institutions in the implementation of this practice.

In addition to this, Transition Pedagogy encourages intentional first year curriculum design to mediate a relevant, involving and social transition to tertiary academic study that is not overwhelming to the new learner in the discipline. Transition pedagogy provides [six key principles](#) that must be present in first year curriculum design effectively support student to transition to their studies.

Recommendation 14

Universal Design for Learning and Transition Pedagogy, be specifically identified in the Higher Education Standards Framework to ensure that students can fully participate and are supported over the course of their studies.

7. What changes to funding and regulatory settings would enable providers to better support students from under-represented groups in higher education?

The Job-Ready Graduates Package that was introduced in 2020 needs to be repealed as there are inherent aspects of the package which are exacerbating disadvantage for underrepresented groups of students.

Firstly, students from underrepresented backgrounds (including Aboriginal and Torres Strait Islander students), are overrepresented in humanities-based courses. These courses are now requiring students to pay the highest band for a university degree.

Secondly, the punitive measures implemented around the 50% fail rate, penalise individual students, who are often vulnerable and at-risk. Job-ready Graduates imposes unfair HELP debts on students, increases government's costs of running the HELP loan scheme, and distorts university incentives in distributing student places between courses. This package further perpetuates inequity and needs to be repealed

Recommendation 15

Repeal the Job Ready Graduates Package as an immediate measure.

Whilst most local students have access to HECS-HELP and thus the ability to pay for their education later, there are mixed views about the effects of HECS on participation of students from low SES backgrounds. A report by Birch and Miller (2007) concluded that students from low SES backgrounds defer higher amounts of fees to HECS-HELP, leading to a reduction in future income when compared to their counterparts from higher SES backgrounds. Therefore, students from low SES backgrounds may continually be disadvantaged despite attaining similar qualifications. In addition to this, accumulated student debt, for students who are often debt adverse could lead students to choose direct entry into paid employment over further study. The persistent under-representation of Aboriginal and Torres Strait Islander peoples undertaking university study in Australia needs to be addressed with bold measures.

Recommendation 16

A review of the HECS-HELP Loan is required so as to not deter financially disadvantaged students from accessing higher education. We recommend a removal of HECS –HELP for all First Nations students at a minimum, with a possible extension to all underrepresented groups.

In addition to this, evaluation and monitoring is critical to measuring the impact of student equity strategies and initiatives. The Student Equity Higher Education Evaluation Framework has been useful as a national tool, however further support is required to assist the sector in implementing the framework. In addition to this, national and data monitoring evaluation tools are required to fully realise the potential of HEIMS/TCSI and QILT data analysis.

Recommendation 17

Provide support to the sector through the National Centre for Student Equity in Higher Education with the implementation of the SEHEEF and invest in national data and evaluation monitoring tools (such as the UK Heat Tracker).

The Higher Educations Standards Framework already sets minimum standards for universities to meet in relation to participation and attainment, and teaching and learning including consideration of the specific needs of equity cohorts. TEQSA has a responsibility to monitor this and universities are well aware of their need to comply. Public policy settings in relation to equity and funding are required to which enable universities to meet these threshold standards.



The Accord Panel's engagement at the Student Equity Forum, held in UTS Sydney was a significant opportunity for the Accord Panel to hear from the sector on the key issues around access and participation in higher education. We would be happy to facilitate further opportunities for the panel to engage with the sector at the point that the first outcomes paper is released in July.

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

Kind Regards,

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