

Australian Universities Accord Panel
c/- Accord Secretariat
Department of Education
GPO Box 9880
Canberra ACT 2601

11 April 2023

Federation University appreciates the opportunity to provide this submission to the Accord process. The Australian Universities Accord is an opportunity to look at how best to support our students irrespective of where they live, how to build the pipeline of skilled workers the economy needs now and into the future and how, over time, we can harmonise vocational and higher education to create a more integrated post-secondary education system.

As a regionally headquartered, dual-sector university with peri-urban and city campuses, Federation University serves a high proportion of first-in-family and low socio-economic status students. Many are mature-aged and studying part-time while working and caring for family. Cost of living pressures and juggling other aspects of their lives means they need significant support to remain engaged in their education. When our students complete their studies their employment outcomes, including starting salaries, are good. Our challenge is preparing and retaining students through to completion of their study so they do have great life opportunities. Supporting these students to succeed will address what perhaps should be the key priority of this Accord process – to close the gap between metropolitan and regional outcomes by **increasing retention and attainment of regional and low socio-economic students**. Not to do so will hold back national productivity and hamper emerging industries across the regions from growing.

Although this review's terms of reference are focused on universities, this is an opportunity to look over the horizon to a pathway to **greater post-secondary education harmonisation** when over the next decade or two, workers in transitioning industries will require upskilling and reskilling and access to skills-based short courses and stackable/nested courses that can be taken as part of a broader qualification or stand-alone competency skill set. This would require full engagement with the states and consideration of more clearly delineated responsibilities for funding and regulation but we propose some measures in this submission that could be pursued over the next decade to inform that journey.

For its part, Federation University is focused on the student experience and setting up our students ready to contribute to the workforce. Our strategic focus over the coming years is to provide a distinctive offering, through a Co-operative education model, that will see all of our courses co-designed and co-delivered with industry including work-based experiences for every student. This means not being all things to all people. We necessarily have to concentrate on our strengths so that what we do is world class. This includes our applied research across agribusiness, engineering, IT, sports science, education, the care industry

and renewables. Having accountability for taxpayers' dollars means to be sustainable we have to focus where industry and students align with future jobs. This means that as we continue to review courses and programs we will need to assess their viability and that will require government support to ensure we do remain strong and sustainable given the lack of economies of scale we face and the greater needs of many of our students. While we are embracing hybrid models and connecting our students where it works best for them, the pandemic has shown that students still want the face-to-face experience.

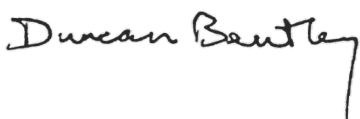
That means we need to be smarter and better at how we utilise our assets. There is no longer any dedicated infrastructure fund for universities and we have been expected to fund maintenance, upgrades and new builds largely on thin margin revenues and debt. A big obstacle to better utilisation and consolidation of our assets beyond this is the question, largely bound up with legacy buildings on land owned by the state, of relinquishing surplus assets which require annual maintenance to meet occupational health and safety requirements even where these buildings are no longer fit for purpose. Land and building management, like appointments to University Councils, responsibility for tabling annual reports and levying payroll tax, sits with the States. **Infrastructure**, particularly for regional universities like Federation, remains a significant cost on our operations.

There are a number of concurrent reviews and processes underway which should ideally be aligned to the extent possible to ensure resources and regulatory arrangements are complementary and not at cross purposes. This includes but is not limited to: the new Jobs and Skills Australia and Jobs and Skills Councils, the Migration Review, the Employment White Paper, the National Skills Partnership Agreement, the Victorian Skills Plan, the Productivity Commission's five-yearly review and work underway across schools and early childhood education and other discussion papers across the higher education portfolio, including reviews of admissions practices and cost of delivery.

Federation notes the many competing calls on the federal Budget. Industry and state governments also have a key role to play in systemic reform particularly when it comes to the broader post-secondary landscape.

We have also provided input to the Universities Australia and Regional Universities Network submissions and endorse a statement from the dual-sector providers.

Yours sincerely



Professor Duncan Bentley
Vice-Chancellor and President

CHALLENGES AND OPPORTUNITIES

Questions 2, 34, 38

There have been numerous reviews of higher education since the Dawkins reforms of the 1980s.¹ Since that time when the percentage of the Australian population with a higher education degree was barely in double figures, it has grown to exceed the overall attainment rate set by the Bradley Review, and ahead of time. Despite these macro attainment targets having been met, the attainment of low socio-economic status and regional students have stubbornly remained well below the average OECD attainment level.

If we are to boost productivity and ensure the regions remain sustainable for the 30 per cent of Australians who live there, we need to address this area of under-achievement as a priority of this review. Regional Australia needs a pipeline of workers in key industries like agriculture, renewable energy, nursing and allied health care, teaching, engineering and trade skills. Our students who complete their studies get good job outcomes² but the challenge is to address the leakage of those students who do not complete and who often have lower life opportunities as a result. We will return to some specific ideas to help support these students.

As a dual-sector, regionally headquartered university we must continue to do better to address attrition and retention but wider issues with school attainment and preparedness, regional housing and childcare availability and less concentration of infrastructure and public transport options and sparser populations make the challenges for regional universities greater.

Proposal:

A base funding level that recognises this disparity between metropolitan and regional Australia in the form of a **Universal Higher Education Service Guarantee (UHESG)** would acknowledge the different cost structures regional universities face. This could be reviewed every five years to assess its efficacy in improving outcomes.

The as yet unrealised Indigenous, Regional and Low-SES Attainment Fund from Job Ready Graduates and visa fees from international students studying in regional Australia could be potential sources of funding.

¹ Higher Education in Australia: A review of reviews from Dawkins to today, Australian Government, Department of Education and Training, Canberra (2015) accessed at <https://files.eric.ed.gov/fulltext/ED573464.pdf> on 24 March 2023

² Quality Indicators for Learning and Teaching, 2022 Graduate Outcomes Survey accessed at: [https://qilt.edu.au/surveys/graduate-outcomes-survey-\(gos\)](https://qilt.edu.au/surveys/graduate-outcomes-survey-(gos)) on 24 March 2023

BETTER STUDENT SUPPORT TO IMPROVE RETENTION OF LOW-SES AND REGIONAL STUDENTS
Questions 3, 4, 11, 22, 30-33, 39, 40, 45-47

The data tells us that educational attainment in regional Australia is well below that of our capital cities. That starts in early childhood, through school and into post-secondary. The 2019 National Regional, Rural and Remote Tertiary Education Strategy (Naphthine Review) found a clear gap in participation and attainment rates between metropolitan and regional Australia, finding that regional students faced greater challenges transitioning to post-secondary education and needed additional support.³ The Naphthine Review goal of halving the 2016 attainment gap of 25-34 year olds with a Bachelor degree by 2030 should be a stated objective of the Accord.

The Naphthine Review found that regional students were more likely to be part-time, mature-aged, female, from lower socio-economic backgrounds and Indigenous. In the case of Federation University, around 1 in 4 students are from low socioeconomic or disadvantaged backgrounds and more than half our undergraduate students are the first in their family to go to university, the highest proportion in the country.⁴

Closing the regional - metropolitan gap should be a priority if economic opportunity and prosperity is to be shared across the nation more evenly. We know that around 7 out of every 10 students who graduate from a Regional Universities Network (RUN) university will stay to live and work in the regions.⁵ Conversely, 74 per cent of those who relocate from regional Australia do not come back.⁶

The higher education regulator found smaller institutions and those with a higher proportion of part-time and external enrolments were correlated with higher attrition.⁷
Our students have some of the highest needs and many are part-time; yet taxpayer-funded student support is based on student load, not actual need.

³ Commonwealth of Australia (2019) National Regional, Rural and Remote Tertiary Education Strategy, (Naphthine Review) page 23

⁴ Good Universities Guide, 2023 edition, accessed at: <https://www.gooduniversitiesguide.com.au/course-provider/federation-university-australia/ratings-rankings/undergraduate> on 21 March 2023.

⁵ Economic Impact of the Regional Universities Network, NOUS, September 2020

⁶ Hillman, K and Rothman, S (2007), Movement of non-metropolitan youth towards the cities, longitudinal Study of Australian Research Reports, ACER

⁷ Tertiary Education Quality and Standards Agency (2017) Characteristics of Australian higher education providers and their relation to first-year student attrition, Australian Government

The Grattan Institute’s report *Dropping out – the benefits and costs of trying university*⁸ considers the risk factors of students dropping out noting that nearly two-thirds of students who dropped out of university study felt they would have been better off had they completed their course.

For each percentage point increase in higher education attainment, 0.09 per cent is added to GDP per annum (ie. \$1.8 billion in additional annual economic activity).⁹

Enabling courses– getting to the starting line

Students who undertake enabling courses do not meet Federation degree entry requirements and often have extenuating circumstances that impact their abilities to engage effectively with education. Many have not completed year 12, and they are often also carers/parents/working whilst studying. That they are then able to perform at levels comparable to all other undergraduates is an achievement.

Federation Access Studies (FAST) is Federation’s enabling program that provides a bridge for those who might have thought post-secondary study was not for them because they don’t have the requisite background or study skills. They may lack the entry requirements to begin a degree. This pathway at Federation has equalled the playing field for these students. FAST is a single semester program designed to teach students how to study effectively, including how to write in an academic setting, research, use university systems and apply these skills to learning. It also offers an elective maths course for students who want to study an engineering degree. Successful completion of Introduction to Technical Maths satisfies entry requirements to apply for an engineering degree.

Those who successfully complete FAST are guaranteed a place in an undergraduate degree program. The challenge though is to provide this opportunity at greater scale across the communities we serve to try and help vulnerable students make it to the next round.

The following table shows the cohorts of 2021 FAST enabling program enrolments:

Program	Low SES	First Nations	Regional & Remote	First in Family	Enrolments
FAST	29%	2%	72%	48%	248

⁸ Grattan Institute, *Dropping out – the benefits and costs of trying university*, accessed at: <https://grattan.edu.au/wp-content/uploads/2018/04/904-dropping-out-the-benefits-and-costs-of-trying-university.pdf> on 21 March 2023

⁹ Deloitte Access Economics, *The Importance of universities to Australia’s prosperity*, 2020, page 17 accessed at <https://www.universitiesaustralia.edu.au/wp-content/uploads/2022/04/Report-The-importance-of-universities-to-Australias-prosperity.pdf> on 23 March 2023

The table below shows the student progress rate (subjects passed) for commencing first year Federation University undergraduate students who had previously completed an enabling program and commencing first year undergraduate students who had not.

Enabling status	2015	2016	2017	2018	2019	2020	2021
Enabling Completers	72.3%	69.2%	75.9%	74.4%	79.2%	84.0%	79.9%
Non-Enabling students	71.5%	72.9%	74.6%	71.2%	70.6%	78.9%	78.3%

The data reveals that students who had previously completed the FAST enabling program and then commenced first year undergraduate studies for the period 2015 through to 2021 passed between 69.2% and 84.0% of the subjects in which they enrolled. Their mainstream peers enjoyed pass rates across the same period between 70.6% and 78.9%. In a yearly comparison former enabling program students enjoyed a higher or comparable subject pass rate (student progress rate) than their non-enabling peers in six out of seven years. That progress is maintained through to graduation.

Bachelor of Education Studies and the Bachelor of Sport, Physical and Outdoor Education, accredited as pathways, are two of the degrees former enabling students undertake.

Proposal:

- Increase funding for enabling places including changing the enabling loading component so it is provided at an average rate of student contribution.
- Dual offers – enabling and degree. This would remove the attrition point arising from student uncertainty about whether they will be offered a degree place after completing an enabling program.
- Enabling programs be added to the AQF with national standards. This would enable greater portability and recognition of enabling program completion, assisting students to remain engaged with higher education as their circumstances and locations change.
- Remove enabling programs and/or programs less than 8 courses in duration from the 50% fail clause of the JRG package (which is impacting the very students we need to retain if we are to shift the dial on equity participation)
- Change restrictions on Centrelink support from “students engaged in full time study” to “students engaged in full time or part time study.” This would assist students with complex lives and other responsibilities to retain their levels of support while engaging with higher education.

Juggling cost of living and family commitments – staying in the race

Cost of living pressures are impacting our lower SES students across our programs. Even though some of our students may be less than an hour's drive from a campus, a lack of public transport and the high cost of fuel can make the costs prohibitive for students from low socioeconomic backgrounds to participate in face-to-face classes¹⁰

One student called a member of staff to say, although he lives 45 minutes from campus, he could only afford the petrol to attend one day's classes that week and asked which class was the priority. Online classroom connections make continued engagement possible despite these cost pressures but it does highlight the margins some of our students are facing.

Federation received 1327 applications this year for scholarships, but even with industry and community support we were only in a position to award just over 200.

Students have told us that the scholarships have made a big difference to being able to remain engaged in learning:

As a person who has previously had their very independence taken away, receiving this scholarship is so empowering. It empowers both me and my children. I aspire to do great things and believe I can. For me, the scholarship is a gift that will never stop giving as it gives me the opportunity to create a better future for my children. A better future for children is a better future for us all (Liz).

As I am a single mother I had been trying to work out how I could afford 6 weeks placement with reduced wages. But thanks to this scholarship I now will be able to. (Tammy)

I travel back and forward between my commitments at campus and at home with my two young children, so this scholarship is going to help enormously with even just the fuel costs of this journey. (Jessica-Anne)

As an asylum seeker, my family and I had a hard time paying the course fees, and recently our Centrelink payments were also terminated making our financial situation more difficult. Your donation has been an especially great help in this situation. (Janosan)

I received a scholarship from Federation during each year of my Diploma, and it was a great help as it meant I had some money to go ahead to paying for accommodation when I did placements, and also towards paying my schoolbooks. Being in a regional area, the scholarship and support from Federation meant that I didn't have to drive to and from Stawell from Horsham each day when I was on placement which would have been exhausting and probably too hard to manage. (Sarah, first-in-family)

Proposal:

Provide targeted student support for cost of living and immediate costs that are a barrier to

¹⁰ Hampshire, A (2017), Submission to the Review into Regional, Rural and Remote Education, The Smith Family, Sydney, page 6

study through a matching funding pool (with industry/universities) for scholarships for low-SES and regional students.

Admissions

Our admissions processes are not helping our students to pick studies that play to their inherent strengths and program advice needs to better prepare students to navigate work/life/studies. Anecdotal evidence we have in a few select courses where we accept students through an interview process indicates that attrition is very low as students are aligned with the program and career objectives that follow from the course. Broadening these admission processes to our entire cohort may be ambitious, but it would be of the greatest service to our students.

Proposal:

Compacts and funding could be linked to greater alignment and personalised programs for non-traditional students to navigate life, studies and work in parallel. AI could be used to analyse aptitude and alignment with potential future career, identifying education gaps and personalising remedial courses and testing chosen pathways with partner employers.

INTEGRATED POST-SCHOOL EDUCATION CONTINUUM

Questions 7, 8, 12, 17-21, 37

Better connections between higher education and vocational education and training are essential but will need to be evolutionary rather than revolutionary. While the current process will not be able to undertake a thorough-going review of post-secondary education which would necessarily require engagement with the states and territories, there are processes afoot which should be aligned as best as possible. This includes the work of the new Jobs and Skills Australia and associated Jobs and Skills Councils, the National Skills Partnership Agreement, the Victorian Skills Plan and the Productivity Commission's five-yearly review.

As a dual sector provider covering the Australian Qualifications Framework we make some suggestions to explore better alignment between the vocational and higher education systems that could be phased in over 10-15 years with an assessment of efficacy as part of QILT, Departmental and regulator processes.

Proposal:

1. Pilot (over 3-5 years) dual sectors being **self-accrediting for their VET operations**
 - a. This would require consultations with the states as the current primary regulator of public vocational education
 - b. Industry skills packages can take a long time to negotiate and realise which means vocational institutions and industry can not be as responsive as they should be to immediate workforce skills needs
 - c. This does not obviate the need for regulatory oversight and a focus on outcomes – outcome-based compacts could incorporate the vocational elements of dual-sector providers and involve consultation with the two states and one territory which host dual sector providers

2. To take forward the Noonan Review of the AQF consider, initially as a pilot, an **integrated learning system that would allow a vocational minor** (eg. Cert III in welding) to be undertaken concurrently or sequentially for credit with a higher education qualification (eg. engineering degree). This approach could be particularly relevant to growing industries like the care and clean economy sectors (eg. as gas fitters and technicians transition to new opportunities)
 - a. This would necessitate considering income-contingent loan arrangements to harmonise with the higher education funding system (eg. extending VET student loans to Certificate III and IV) and would need to be considered in terms of skills need (identified by JSA, for example)
 - b. Industrial arrangements including work cover for vocational elements may need to be sorted out for blended degrees but as it is possible to do a double

- degree now in higher education it should be possible to have a seamless degree with a vocational minor rather than a student having to negotiate a different system which adds time and complexity
- c. It will involve two different loan schemes initially
 - d. This should extend to combining minors at other institutions (such as a domestic student undertaking a language minor at another institution as part of a hospitality course or an international student undertaking teaching English as a second language minor as part of a teaching qualification)
3. Seek to align the various reviews and processes underway in the education sphere and consider a deeper future analysis of post-secondary education drawing on 1 and 2 above
- a. There are many differences in funding and regulation for vocational and higher education between the Commonwealth and the states, between states and even within jurisdictions. The State Government underwrites standalone TAFEs for example, but not the vocational institutions that are part of the four dual sector operations in Victoria
 - b. Over the next 5-10 years consider undertaking a thorough **review of post-secondary education** looking at: definitions and overlap, different funding arrangements, regulatory and skills-based requirements including incorporating skill-based short courses into the AQF
 - c. This would require full engagement of the states as part of the National Skills Partnership Agreement after the current agreement and might consider one tier of government taking on responsibility for post-secondary (public) education with an appropriate one-off transfer of funding from the other tier
 - d. Commit to a longer-term plan that considers the learnings of the above to create a **single post-secondary regulator**, reducing duplication and artificial barriers between VET and Higher Education frameworks and allowing the evolution of a more seamless journey to and within post-secondary education where the status of, and aspiration for, vocational and higher education are equally revered
 - e. Five-year outcomes and mission-based compacts with tertiary institutions could include industry bodies and state and local governments and be the accountability instrument that underpins new five-year funding agreements that could be light-touch reviewed annually
 - f. A single post-secondary loan scheme could be considered, incorporating higher education, VET and skills-based short courses that take account of prior learning and assessed national skills needs

ENGAGING EARLY AND OFTEN

Questions 9, 10, 28, 29

Teaching into hard-to-staff and out-of-field schools

Problems with the teacher workforce in regional Australia have been well documented. Either it's hard to staff rural schools or teachers teaching out-of-field. This is particularly an issue in STEM subjects where teachers do not feel confident in teaching maths and science subjects. This has led to some of the poor PISA results that have again been recently highlighted.

Proposal:

Regional universities, and others, could be incentivised to fill the gap in rural and regional schools by teaching into these schools using hybrid methods, including connected classrooms. This would require funding from the schools budget and could be trialled in a limited number of 'buddy' schools over a 2-3 year period.

Higher education apprenticeships

This would see regionally headquartered universities partnering with regional employers in years 10-12 of school to provide early internships and higher education apprenticeships (for credit towards an undergraduate degree) to keep otherwise disengaged students in an education pathway (such as Federation's partnership with IBM that engages with schools through vocational education and higher education). It seeks to deal with disengagement before students are lost to the post-secondary system and allow students to embark on a career while still at school. This could include, for example, engineering higher education apprenticeships in the Wimmera and outer Gippsland.

Proposal:

Trial a program in conjunction with industry in national skills priority areas and evaluate after 5 years to assess engagement with post-secondary education, particularly those students from low-SES backgrounds. It would apply the best elements of the former technical colleges and VET in schools.

FUNDING A SUSTAINABLE HIGHER EDUCATION SYSTEM

Questions 1, 5, 6, 13-16, 23-27, 36, 41, 43, 44, 48, 49

Despite the funding model driving comprehensive sameness through seeking margin and scale, Federation's strategic focus is to embed a partnership model of education with industry co-designing and co-delivering learning and students having strong prospects of employment after study by virtue of having established work-place relationships irrespective of their course of study. This recognises the need to be relevant to our local communities and to align with the workforce industry tells us it needs.

This means that we cannot be all things to all people and it will be important to have political support for pursuing this path which won't always be without its challenges. It is simply unsustainable to continue to offer courses where student and industry demand is not there. While there is an argument that the same comprehensive opportunities should be available in the regions as the multi-institutional city offerings, growing hybrid and partnership models will be required with stackable options. If specialisation and differentiation are to be realised, it will require funding, regulation and extant homogenous accreditation arrangements to be nuanced.

As noted earlier in this submission, the big challenge is getting and keeping students engaged in post-secondary education. Once we do, they stay and they do well. The challenge is living cost pressures that are forcing students, many part-time, mature and women to make difficult choices with their other competing priorities.

Placements

Placements and practicums, including for nursing, are a major issue where greater co-ordination between the Commonwealth and the states is required. While various initiatives have sought to increase enrolments, the lack of sufficient training places hampers our ability to produce a pipeline of workers.

This has meant we have had to effectively cap nursing enrolments due to lack of supervised placements. Health portfolios in different states take different approaches. Greater coordination between education and health portfolios on placements would help mitigate the inefficiencies of multiple institutions duplicating administrative effort. As part of our Co-operative education model we will continue to expand our network of partners but note that governments, as employers, should have a direct interest in placements of teachers and nurses in the public system. We also incur a sunk cost for any placements not taken up for whatever reason, as we are forced to pay upfront; and what we pay for nursing placements is not what goes into the system for nurse training as some of it is directed to doctor training and other costs. Ten per cent of our budget for health training is going

towards placements that could otherwise be directed to student support if placements were more equitably funded.

The cost of travelling for placements, finding accommodation and being away from family for whom they have caring responsibilities is also an issue for students in the more regional and remote communities we serve.

Working with the states to innovatively utilise simulation and better cater for students having to travel for placements would at least help to address a funding and administrative burden that has fallen to universities.

Proposal:

Consider recommending the Commonwealth and the states - through ministerial meetings of health and education ministers - discuss nursing placements in the first instance given ready and willing applicants are constrained by availability of placements. Governments could be asked to look at more equitable funding and administrative arrangements.

Accreditation of courses

Accreditation bodies can be extremely prescriptive with unnecessary cost and administrative burden. In one instance accreditation of a few (health) courses involved 1,400 pages and \$60,000. The United Kingdom takes more of a partnership approach to accreditation and a (health) comparison is around 30 pages and £2,000 - £3,000.

Quality assurance is non-negotiable and there is a role for accreditation bodies to play but having a more responsive and streamlined system would save a lot of time, money and effort. A secondary issue is the need for greater specialisation, which is constrained by the homogenous nature of accreditation processes.

On the vocational side of our operations, Federation TAFE was the first Victorian TAFE to secure five-year accreditation to the New Diploma of Nursing qualification from the Australian Nursing and Midwifery Accreditation Council recently. We are not against accreditation per se but think the process can be vastly improved.

Proposal:

Governments and regulators should encourage accrediting bodies to look critically at their approval processes and the extent of paperwork they require. Risk needs to be appropriately balanced with delivery but we need to ensure risk management is not actually just unnecessary bureaucracy.

Skills-based short courses

As yet, no provider appears to have approached skills-based short courses from a skill gap/need and flexible pathway option. Government funding - potentially from newly

established pilots for microcredentials - as well as regulatory simplification - would address a gap/industry need and could potentially lead to the changes required to enable recognition of skills/qualifications obtained overseas.

Proposal:

Consider existing program funding and regulatory simplification (and extension to the AQF) of skills-based short courses, requiring universities to work with other institutions and industry partners.

Accreditation of qualifications of new arrivals to Australia, including refugee in-take

There is a missed opportunity in this skills shortage environment to harness the skills of our new arrivals including refugees who have skills that could be better utilised in their field of study in which they were practising before arriving in Australia. A progressive de-skilling due to the difficulties in having qualifications recognised in Australia means we are not harnessing the skills and talents of all those who want to contribute.

Barriers include: cost of upskilling; low mapping of qualification equivalence leading to significant qualification gap; need to review the qualification levels, experience, pathways and progression for this upskilling across the accrediting bodies as the system is rigid and not responsive to economy-wide demands.

Government, potentially through Jobs and Skills Australia and the associated Jobs and Skills Councils, should work with accrediting bodies and universities to design skills-based competency bridging courses in key professions to assure overseas qualifications meet Australian standards including through recognition of prior learning and practise.

Targeted scholarships for these disadvantaged cohorts and/or extension of these courses for eligibility to income-contingent loans would help to facilitate skilled migrants and refugees more readily contributing to Australian society in their field of expertise.

Proposal:

Examine the issue of newly arrived migrants with specialist expertise in skill shortage areas not being able to have their qualifications/experience recognised and how government/industry/universities/unions might agree on a process for developing a graduate certificate that could recognise (through a points system) equivalence of qualification.

Infrastructure

There is now no designated infrastructure fund for the sector and at the time it was removed, the special circumstances of regional universities were noted. Regional

universities often have multiple campuses, lower scale, higher costs and less sizable benefactions for building works.

Better coordination of infrastructure across Governments, especially involving divestment of assets to allow better utilisation and concentration of facilities, would be welcomed.

Proposal:

Consider designating an element of the National Reconstruction Fund to priority regional infrastructure needs that enhance the student experience, building partnership with the community and consistent with the government's focus on precincts. Regional university access to the ARC's existing Linkage Infrastructure, Equipment and Facilities funding scheme will also help to provide an avenue to provide fit-for-purpose student and community facilities that can adapt to the hybrid and technologically adaptive learning environment.

Research:

Federation is ranked Well Above World Standard in research in Environmental Science and Management, Nursing, Human Movement and Sport Science, Applied Mathematics, Civil Engineering and Clinical Sciences. We are currently piloting a research project in chronic disease in western Victoria, which if successful could have major benefits for primary health care outcomes and relieve pressures on the health budget. We have also developed for local industries innovative solutions in water and dairy that have improved industry efficiency. Our roots are in mining and our expertise in mine rehabilitation and building capacity in the growing renewables industry will help communities such as in Gippsland transition to the new economy over the coming decade.

We are focused on what we do at world standard and where we can work in partnership with industry to find solutions to local problems. While we seek to partner where appropriate, as we do with TAFEs, other higher education institutions and industry partners in the communities we serve, frameworks that facilitate partnership will be the most effective. As tempting as it may be to concentrate research funding in a select group of a dozen institutions with legacy advantages, the concept underpinning the ERA was that excellence can happen anywhere. While finite resources should not be unnecessarily diluted, parts of the country that generate the majority of the country's export wealth should not be excluded either.

Proposal:

Acknowledge that regional universities provide valuable applied research to industry in their communities and that there is scope for greater collaboration between institutions in the national interest.

Industry:

Our Co-operative Education model will enshrine industry and students at the heart of everything we do. Industry collaboration is already an important element of our delivery with our relationship with IBM dating back more than a quarter of a century. Federation's Technology Parks host 59 businesses and agencies that employ more than 2,200 full-time equivalent positions and contribute in excess of \$700 million in annual economic activity.¹¹

Proposal:

Maintain a focus on industry partnership but noting that as the recipient of a skilled workforce, industry also has a vested interest in student success. We acknowledge industry support for student scholarships and placements but also note that much of the incentivisation for the partnerships by way of revenue measures sits with industry.

AQF:

Extending the AQF to stacked/nested courses will help with skills acquisition but also potentially improve the measure of attrition as workers and school leavers will not have non-completion of a degree count as non-retention but rather successful completion of the component they actually need. A new RPL framework/repository should be established.

Proposal:

Extending stacked/nested courses into the AQF would deliver on Peter Noonan's extensive AQF Review, within a newly devised RPL framework that will help mature aged workers and migrants.

Funding/grants programs

One key inefficiency in the system is the different Commonwealth and state funding programs across multiple portfolios. Rather than having each institution keep tabs on every program permutation for possible funding, it would be a big red tape reduction for a portal to be established with all grants programs for which universities are eligible to apply.

As the lead department administering the Grants Guidelines, the Department of Finance may be best placed to co-ordinate this. The portal could be linked to state government sites to provide completeness on funding programs across the federation.

Proposal:

Consider recommending to Government that it develop a single portal for all relevant grants programs/processes to which universities can apply to create efficiencies for universities and give greater transparency for government, taxpayers and the sector. Funding programs

¹¹ Federation University Australia accessed at: <https://federation.edu.au/connect/partnerships/technology-parks/about-us/innovation-and-entrepreneurship> on 29 March 2023.

are spread across government and include Infrastructure, Education, Innovation, Foreign Affairs and Trade, ARC, NHMRC, Environment and Energy, etc.

International education

International education remains Australia's largest non-resource based export. It has long been a source of important international networks and soft diplomacy and it enriches the life of communities here. As we saw during the pandemic, the role international students play as a consumer of accommodation, hospitality and travel and as a workforce in hospitality, retail and the agriculture sector were undervalued.

We need to make international students welcome because international education is becoming more contested and our early leader advantage is being whittled away by our English-speaking competitors and non-English speaking countries that are developing their own domestic sectors. Our competitors are achieving faster visa processing, offering more certain work rights and a clearer path to permanent residency. The global race for talent and labour is on and although a sprint now it will remain a marathon in the years ahead as demographics shift to an aging population.

One thing that causes the sector major issues is when there are sudden changes in visa processing that see unexplained rejections that are not communicated to the sector. While quality and mitigation against fraud and national security considerations are paramount, when there is a change in approach from government or trends emerging, it would be useful that the institutions concerned be given early warning as we are all working to protect the integrity of our non-discriminatory migration system.

Currently the permissible **international students fortnightly working hours** cap is based on being paid but in order for paid internships/placement in industry not to be counted in the cap, the definition would need to be changed to something along the lines of "only where not directly associated with gaining a qualification". Federation's Co-operative education model will see students being paid while on full-time or part-time work placements.

Proposal:

Given the lead times and impact in important partner markets overseas, it is critical there is timely communication of any **changes in temporary entrant and migration settings**, policies, protocols or risk assessments that can have sudden and unexpected implications for our operations and for how we are perceived in those overseas markets. Improved communication and coordination between Home Affairs, Education, JSA, DFAT and Austrade and engagement with the International Education Council and individual institutions at the earliest possible stage would be appreciated.

Consider a change to the definition for the cap for fortnightly hours an international student can work.