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Professor Mary O'Kane AC
Chair
Australian Universities Accord

Dear Professor O'Kane

Australian Universities Accord Discussion Paper

Thank you for the opportunity to comment on the Australian Universities Accord Discussion Paper which was released on 22 February this year.

I am pleased to attach a submission from the University of Southern Queensland.

Kind regards

A handwritten signature in black ink, appearing to read 'G. Mackenzie'.

Professor Geraldine Mackenzie

Vice-Chancellor

**FEEDBACK ON THE
AUSTRALIAN UNIVERSITIES ACCORD
DISCUSSION PAPER**

The University of Southern Queensland (UniSQ) respectfully acknowledges that the lands and waterways on which we teach and learn have long been, and continue to be, places of knowledge exchange, sharing, wisdom and philosophy. Our commitment is set out in *Placing uni in community. A Blueprint. Future directions in First Nations education, research, and engagement at the University of Southern Queensland 2022*.¹

We welcome the opportunity to provide feedback on the Australian Universities Accord Panel Discussion Paper² which opened for consultation on 22 February 2023.

Regional universities operate in a notably different context to capital city-based universities. Regional universities contribute to the social, cultural, economic and development imperatives of their regions in ways that do not apply to the same extent in metropolitan contexts. These contributions are of vital importance to sustaining vibrant and prosperous regional communities which in turn strengthen the social and economic fabric of our nation. As well as being major employers, regional universities develop regional workforces, partner with and deliver innovative outcomes for regional industries, engage local industries in world-class research activities, do the heavy lifting in terms of access, participation and attainment for those student groups that remain under-represented, provide accessible opportunities for life-long learning, offer cultural events, and importantly provide safe places for communities to engage with the university and with each other. The regional context, however, is accompanied by diseconomies of scale, thin markets and large geographic footprints that restrict growth and investment, and a high reliance on revenue from teaching, particularly when compared with counterpart institutions in metropolitan areas. For these reasons, the impact of even small adjustments in the higher education system are amplified for resource-stretched regional universities.

In particular, we offer the points below for consideration.

1. FIRST NATIONS STAFF, STUDENT AND KNOWLEDGES

Discussion Paper sections that refer:

- 1.3** *The nature and purpose of Australian higher education*
- 2.1** *Population and community structure*
- 2.3** *Equality, participation and democracy*
- 3.2** *Meeting Australia's knowledge and skills needs*
- 3.5** *Creating opportunity for all Australians*
- 3.6.1** *Communities*

As part of our place-based mission UniSQ, like other regional universities, is committed to reaching and exceeding population parity for First Nations student participation and success. This aspiration is critical for Australia's future as a nation. Achieving these targets could be more quickly achieved by

¹ https://www.unisq.edu.au/-/media/usq/about-usq/governance-and-leadership/plans-and-reports/first-nations-blueprint_unisq-2022-2025.ashx?rev=2070f7efb85d4e66b31f2a8d0b21e400&hash=CF544AC2DE8FEDCC4D045AE706A938AE

² <https://www.education.gov.au/australian-universities-accord/resources/australian-universities-accord-panel-discussion-paper>

uncapping places for all First Nations Students and replacing the student contribution for First Nations students with a progression scholarship, rewarding the growth of First Nations Academic and Professional staff across universities, and by working to ensure that First Nations ways of being, knowing and doing are both visible and ingrained across our institutions and importantly are enduring aspects of our learning, teaching, research and community engagement. Achieving these outcomes requires purposeful trust-based relationships with First Nations communities sustained over time, systematic embedding of First Nations knowledges and perspectives into discipline curriculum and pedagogy, and intentionally growing the First Nations workforce in universities.

In addition, we believe that non-Indigenous Australians have much to learn from Australian First Nations knowledges and an integral part of our higher education system should be to provide opportunities for learning on Country. Country is the place where knowledge emanates and is taught and learnt. Caring for Country is therefore an investment in knowledge production, including language maintenance and recovery which is deeply embedded in First Nations social and emotional well-being. The literature places a strong emphasis on the cultural benefits of caring for Country, articulating the embedded relationship between Country and culture that sustains cultural and spiritual traditions.³ Recent analyses have found evidence that ‘Caring for Country’ programs can improve health outcomes.⁴

In the context of these foundational principles, we propose that the higher education system should be appropriately funded to extend and stretch beyond the notion of merely working on and acknowledging First Nations lands through traditional modes of teaching in the classroom and should aspire to utilise Indigenous pedagogies of *Caring for Country* as an articulation of First Nations Knowledges to on-country teaching and, outside of classrooms, learning on Country.

It is our assertion that this is a core element of growing knowledge for all future students, that could be realised through, for example, support for First Nations academics to facilitate the process of content, securing spaces on Country for the learning to take place, and accessing and working in partnership with specialist First Nations knowledge holders about Caring for Country. Implementation at institutional level would involve a First Nations working party that would oversee process and community engagement with relevant Traditional Owners.

RECOMMENDATION 1

We ask the Review Panel to consider a new approach to supporting First Nations students’ participation and success. This new approach should include:

- Uncapping places for all First Nations Students and replacing the student contribution with a progression scholarship.
- Performance incentives for growing the number of First Nations Academic and Professional staff within and across universities.
- Appropriately resourcing the work required to ensure that First Nations ways of being, knowing and doing are both visible and ingrained in our institutions and importantly are enduring aspects of our curriculum, pedagogies and research – through initiatives such as learning on Country.

³ Griffiths and Kinnane 2010; Berry et al. 2010; Morrison 2007

⁴ Burgess et al. 2009, Burgess, Mileran & Bailie 2008, Johnston et al. 2007

2. JOB-READY GRADUATES PROGRAM

Discussion Paper sections that refer:

3.2.3 *Ensuring adequate provision*

3.9.1 *Commonwealth funding for higher education research and teaching and learning*

3.9.3 *Job-Ready Graduates (JRG) package*

We support the widely held view that the time has come to move beyond the Job-Ready Graduates (JRG) Package that was introduced in 2020. Intended to steer enrolments to courses with good prospects of employment and prepare the system for an expected influx of students who were born under Howard government treasurer Peter Costello's baby bonus scheme in the early 2000s, the policy setting seems not to have achieved its aim of improving higher education and providing additional opportunities for regional Australia. The initiative assumes that students are more sensitive to price than they are and does not account sufficiently for the extent to which personal interests and job prospects influence their choices.

JRG also assumes that universities will provide additional places in response to changing patterns of student demand. It is the case that university enrolments tend to mirror student applications but, in certain disciplines, JRG reduces the financial stimuli for universities to meet student demand. In other words, JRG has given rise to a misalignment in the form of student prices to influence demand on the one hand, and opposing university funding rates to influence supply on the other.

JRG attempts to influence student enrolments by using Commonwealth contributions as a lever. Typically, on average, a reduction in course funding means that universities need to deliver an increased number of student enrolments as a proportion of the amount they receive from government. However, the introduction by JRG of increases in Commonwealth contributions in priority areas means that, in those fields, universities need to then deliver proportionately fewer enrolments for the amount of government subsidy they receive.

The financial arrangements established to support transition to the new cluster funding model associated with JRG are also of concern. Those arrangements included the transition funding, which delayed the effects of revenue reduction between 2021 and 2023, albeit reducing significantly annual during this period. This transition funding ceases at the end of 2023 which, even more worryingly, coincides with not only an overall downturn in higher education participation (particularly for mature aged students who constitute the majority cohort in non-metropolitan institutions), but also with the end of the Maximum Base Grant Guarantee that was introduced to sustain teaching revenue during the COVID pandemic.

RECOMMENDATION 2.1

The Review Panel should recommend that the Job-Ready Graduate Program changes, including the changes to funding clusters and that the '50 per cent eligibility' rule be retired immediately with appropriate recognition from Government that the transition-out period and additional administrative burden will need to be supported in order to roll back system changes.

Enabling courses have been another casualty of the JRG Program. UniSQ is one of a small number of university providers of these courses which are a feature of the Australian higher education system and aim to enhance academic readiness for higher education study. They do this by targeting academic challenges in general and filling discipline-specific gaps. The redistribution of courses to

funding clusters has reduced the per student income received for enabling and the loading that replaces the student contribution does not meet the demand for these courses. An unintended consequence is that universities can now allocate enabling 'places' to courses that yield greater government and student contribution income. If this situation continues, the ability of regional universities to improve participation in the communities they serve will be significantly compromised further perpetuating ongoing inequities in the HE system.

RECOMMENDATION 2.2

We recommend that the Review Panel recognises the pivotal role of enabling education in addressing disadvantage and achieving equity in participation as an integral part of the education landscape.

We request that the Review Panel recommends enshrining enabling education in the relevant legislative and regulatory frameworks (i.e the Australian Qualifications Framework) and championing for appropriate levels of funding and resourcing to sustain effective enabling programs. The demand for enabling programs should be supported by both the Commonwealth Grant Scheme and enabling loadings that reflect EFTSL.

3. QUALITY EDUCATION DELIVERS QUALITY LEARNING OUTCOMES

Discussion Paper sections that refer:

- 2.2** *Impact of new and emerging technologies*
- 3.1** *Quality teaching delivering quality learning*
- 3.2** *Meeting Australia's knowledge and skills needs*
- 3.3** *Connection between the vocational education and training and higher education systems*
- 3.4** *A system that delivers new knowledge, innovation and capability*
- 3.7** *Quality and sustainability*

Individual universities are continuously innovating their policy and practice as they strive to improve the student experience and learning outcomes. Key efforts focus on improving the quality curriculum, teaching practices and the way students are supported to learn and engage in their learning – referred to here as support for learning. The quality of learning, teaching and support for learning (LT&SFL) is evidenced by sector strength in national benchmarking surveys and increasing interest in higher education as a discipline for research and is guided by the domains and relevant standards in the Higher Education Standards Framework. Often efforts to improve student outcomes are reliant on key staff or passionate individuals and are subject to rollback and corporate memory loss when those individuals move out of the university or even sector. There is no longer a national 'learning and teaching' body that has a central remit to enhance quality of student outcomes through improving LT&SFL. Quality enhancement can include activities such as identifying areas of research, policy and practice that require further inquiry and development, supporting the take-up of innovative evidence-based LT&SFL practices that improve student outcomes, ensuring artefacts and knowledge created by these projects are available for the sector, and mobilising a coordinated response across the sector when new challenges arise.

Unlike other countries – New Zealand with Ako Aotearoa and the UK with AdvanceHE – Australia now has no central infrastructure for driving national level enhancements in the quality of learning, teaching and the student experience. Adding complexity to its role in governance and regulation (see Section 5 below), TEQSA has attempted to assist. Unfortunately, this has resulted in a prescriptive 'one

size fits all' approach. For example, the Scholarship of Learning and Teaching (SoTL) Guidance Note diminishes the diversity of approaches appropriate for quality enhancement and assumes an acceptance of SoTL as the only conceptual model.

Sector-wide innovation is not encouraged by this approach to LT&SFL and productivity is reduced because each staff member (both academic and 'third space' professionals), department, professional collectives (e.g. law or engineering educators) and university develop specific initiatives. By contrast, national and collaborative work creates synergies that accelerate progress. The Australian Learning and Teaching Council (ALTC) / Office of Learning and Teaching (OLT) have many good examples such as the Learning and Teaching Academic Standards (LTAS) project, first year transition, work on standards for sessional academics and work integrated learning. Such collaborations strengthen the development of evidence-based approaches and rigorous evaluations. We contend that restoring the capacity for collaborative effort is particularly urgent to respond to a changing external environment. A collaborative body is particularly important for regional universities that are isolated geographically unlike their counterparts in capital cities, where collaborative opportunities are more readily achieved.

Further streamlining governance, an independent national Centre would operate collaboratively with the TEQSA, and the various advisory and governance bodies including the Higher Education Standards Panel and the Australian Qualification Framework (see section F of the DVCA Submission submitted to this Review). Since the demise of the previous ALTC/OLT bodies and all associated funding, there is now a backlog of areas requiring priority attention for example a national lifelong learning strategy associated with a framework for streamlining interactions between the vocational and higher education sectors. In the longer term, a national centre could also provide a mechanism to strengthen collaboration between vocational and higher education where a focus on improving student outcomes would be a shared goal despite independent functions, funding and governance arrangements. Development of a shared quality agenda between these sectors would enable a holistic tertiary education system, would improve productivity in the system and would better support the provision of tertiary and lifelong education nationally.

A recommendation for a national centre or institute arising from the Review Panel Institute in the recommendations from the O'Kane Review will help to remove the policy fluctuations that have beset organisations including the Carrick Institute for Learning and Teaching, the ALTC, the OLT and the Australian Awards for University Teaching (AAUT). The costs of such a national body would be limited in the early phase and draw from the voluntarism of AAUT awardees, Principal Fellows of the Higher Education Academy (HEA), and recognised leaders in LT&SFL across Australia. Funding to stabilise the Awards, maintain the current repository and provide the basis for prioritised commissioned work would be necessary. The national body could be an extension of the existing National Centre for Student Equity in Higher Education (NCSEHE), which produces practice and knowledge artefacts that have the potential to improve practice and outcomes for all cohorts of students.

Further details setting out the critical need for such a body have been provided to the Panel to section D of the DVCA Submission on Learning and Teaching and the Submission authored by Johnson, Kift and Lodge proposing a National Centre for Student Success.

RECOMMENDATION 3

We ask that Review Panel recognises the immediate need for a national centre or institute to be established. To be effective the national body should in the short term:

- have a remit focused on improving outcomes for all student cohorts;
- provide thought leadership to strengthen the quality of learning, teaching and support for learning;
- manage the suite of awards that celebrate, recognise and value teaching excellence and programs that enhance student learning;
- provide a mechanism for addressing priority areas and emerging challenges; and
- develop framework for the dissemination of innovations and encouragement of cross institutional collaborations and professional development in strategic areas of Learning and Teaching.

4. FUNDING

Discussion Paper sections that refer:

- 2.6 Economic transformation, changing jobs, industries and capabilities*
- 3.2.3 Ensuring adequate provision*
- 3.9 Investment and affordability*

In the same way as the first round of consultation late in 2022, UniSQ supports the views expressed in the Regional Universities Network (RUN) Submission. In particular, we echo calls for **a resumption of demand-driven funding**. Broader equity considerations notwithstanding, it is widely acknowledged that demand-driven student funding had the effect of improving participation of students in regional areas. While it could be argued that other contextual influences such as low unemployment and rising inflation may have contributed to the hiatus, the suspension of the demand-driven mechanism in 2017 and the consequential introduction of the capping of funding related to Commonwealth Supported Places (CSPs) effectively halted gains in regional participation and attainment.

If we accept that a healthy education ecosystem is characterised by diversity in the types of providers, then it stands to reason that a more diversified approach to funding of universities is not only appropriate, but essential to maintain a diverse system. This matter is of particular concern to the regions, which benefit markedly from higher education providers that are regionally located. Higher education funding models have historically advantaged larger, metro institutions, particularly taking into account the large investment portfolios which those organisations tend to enjoy, their locations which are attractive to international students and large industry partners, and the associated economies of scale which they are able to leverage.

However, funding purely on the basis of Equivalent Full-time Student Load (EFTSL) effectively incentivises large universities to simply become larger, fails to recognise the additional per student cost of service and delivery in non-metropolitan areas and fundamental differences in the cohort characteristics, and can give rise to unintended consequences, such as an increasing reliance on external contractors to develop and even deliver learning materials. Aside from the inevitable disadvantage to smaller universities that serve regional communities and the associated threat to the long-term viability of regional providers of higher education, there is, arguably, reputational risk to the sector.

If we take into account the financial impost of supporting non-traditional students to succeed (such as additional allowances not only for First Nations pathways education but also for regional, rural and remote and first in family students, and those with disability and from low SES backgrounds), then it

stands to reason that a differential funding model related to institutional missions and place is required to optimise the success rates of those students. Such a funding model should include differential thresholds for both student fees and repayments that not only reduces disadvantage but, further, incentivises students from those equity cohorts.

RECOMMENDATION 4.1

We recommend that the Review Panel considers other methods of funding (for example, applying a different rate for an initial number of EFTSL, or a per student loading based on factors of disadvantage) as a way of addressing this conundrum for national benefit.

A key challenge for regional universities is ensuring their physical environments, including formal and informal learning and teaching spaces, research facilities, and student amenities are comparable with those that can be offered by metro universities. Well designed, contemporary physical environments play an important role in attracting and retaining students and staff. A matter of significant concern to regional universities is the absence of infrastructure funding. The last recurrent funding of any scale dedicated to the maintenance or upgrade of critical university facilities was the Education Investment Fund (EIF) which was established in 2009 but subsequently abolished in policy in 2014. The impact on university teaching and research facilities of the withdrawal of that support has been disturbing in the face of aging facilities, and particularly for regional universities that do not operate with large cash reserves and, unlike our urban counterparts, are less able to rely on borrowings.

RECOMMENDATION 4.2

We recommend that the Review Panel considers an infrastructure fund to ensure regional universities are able to maintain and develop their physical environments in keeping with their metropolitan counterparts.

Relatedly, **research funding and the research workforce** in Australia are in a parlous state. From Department of Education Data⁵, we know that the research block grant in 2001 was funding \$0.82 for every \$1.00 of research income and, in 2020, was providing just \$0.384 per \$1.00 of research income. In addition, research degree completions are growing significantly more slowly than research income, with growth in research degree completions increasing approximately 10 per cent since 2015 while research income has increased some 35 per cent (roughly 25 per cent adjusted for inflation). Universities are being starved of critical resources to support research and, since the Research Training Program supports a large share of Higher Degree Research (HDR) students, universities are unable to invest sufficiently in the creation of the new research workforce. Consequently, the research workforce is not keeping pace with the demand for research, as evidenced by the growth in research funding.

Furthermore, despite numerous attempts to increase industry-university engagement, it is clear from **Figure 1** below (also drawn from Department of Education data) that industry funding has remained largely static as a component of research funding, and funding for basic research is also falling as a proportion of total research income. It is evident that the research system is, quite simply, being starved.

⁵ Department of education - HERDC data and Research block grant funding
<https://www.education.gov.au/resources/research-block-grants>

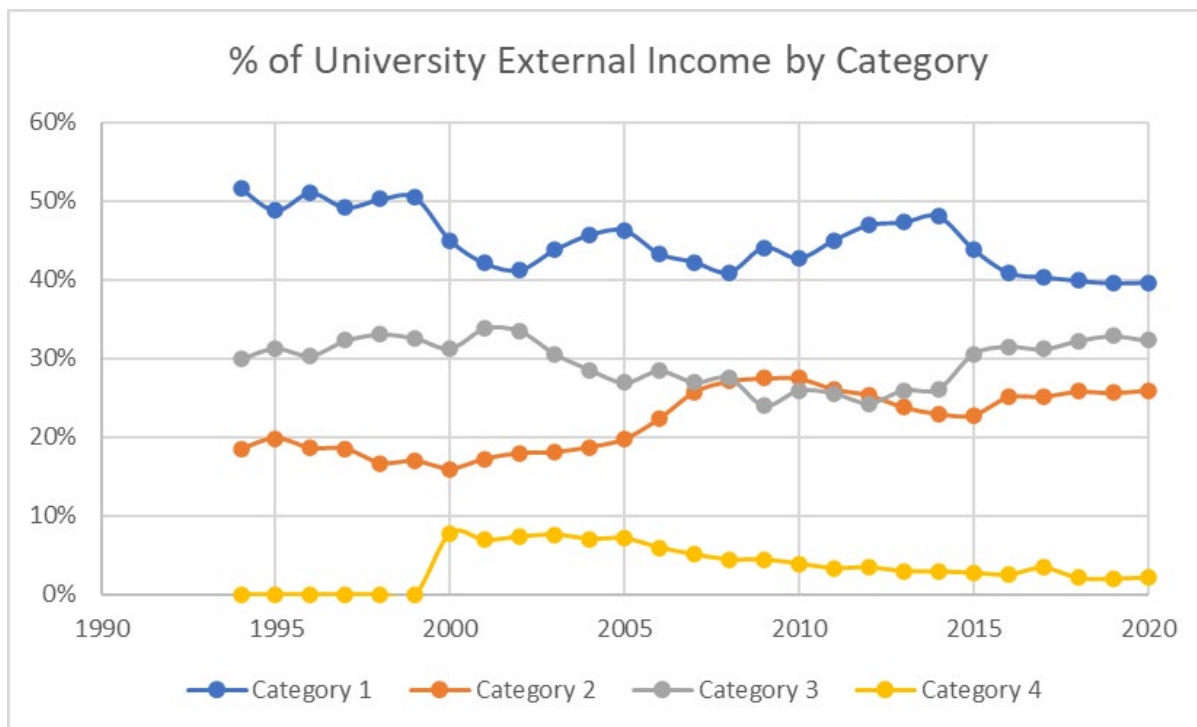


Figure 1
Research Income by HERDC Category – Department of Education⁶

While some may argue that this is a university problem, industries remain motivated by profit and, despite tax incentives to do so, actively resist contributing anything close to full cost of research. It is unsurprising therefore, that when the problem is compounded by a sharp decline in funding through the block grant, universities have little incentive to pursue industry funding that will likely not fully cover the costs of the research undertaken. Research funding is a broad issue that will ultimately affect Australia’s capability to make research-based contributions to solving global issues.

Recommendation 4.3

We recommend the Review Panel recommends a coordinated whole-of-government and industry approach to reach the levels of funding needed to sustain the quantity and quality of research in order to solve big global challenges and support national innovation in areas of need.

5. FRAGMENTATION OF GOVERNANCE

Discussion Paper sections that refer:

- 1.3** *Nature and purpose of Australian higher education*
- 2.6** *Economic transformation, changing jobs, industries and capabilities*
- 3.9** *Investment and affordability*

It is our view that current approach to higher education governance gives rise to **fragmentation which hampers provision of higher education and the ability of universities to meet industry needs,**

⁶ Department of education - HERDC data and Research block grant funding
<https://www.education.gov.au/resources/research-block-grants>

particularly in regional areas. Rather than reiterating this content from other submissions, we refer the Panel to the UA and RUN Submissions and Section F on Funding and Governance of the DVCA Submission for further details. The case studies below demonstrate the point and may be useful for the Review Panel to raise an argument for more cohesive effort between government agencies.

Case study 1 – whole of government approach

The Rural Health Multidisciplinary Training (RHMT) Program⁷ aims to improve the recruitment and retention of medical, nursing, dental and allied health professionals in rural and remote Australia. It does this by, among other things, supporting effective rural training experiences (i.e. placements) for health students. A 2020 review of the RHMT Program found that, between 2016 and 2018, 30 per cent of Australian government-supported medical students spent a year or more at a Rural Clinical School and that nursing and allied health placements had grown from some 3,000 per annum in 2004 to more than 13,000 in 2018. The program is administered by the Commonwealth Department of Health and reflects approximately \$200 million per annum funding commitment from the Commonwealth. Major metropolitan universities, including each member of the Group of Eight, receive a large proportion of the funding under this program and have established a network of valuable rural and regional training schools, departments or hubs.

A number of considerations arise from this approach to developing a rural health workforce:

- It is not clear if funding metropolitan universities to establish rural and regional training sites is more effective than funding regional universities to train more medical, dental, nursing and allied health graduates, particularly because at least 70% of regionally educated students stay in regional locations – where the work force shortages are. Health workforce pressures are become more severe across both urban and regional areas, and given the reliance of metropolitan universities on international students in some of these high demand programs, focusing additional investment on regional universities is likely to provide a more sustainable response to regional and rural health workforce pressures,
- Similar workforce issues (maldistribution or undersupply) exist in other disciplines, most notably teaching and particularly secondary education. There is no mechanism to spread the learnings from the RHMT program across the whole of government. The strategies and investment in the RHMT program would likely yield similar rural and regional workforce benefits if applied in other disciplines.
- There are additional complexities in health and initial teacher education programs arising from the role of state governments in provision of health and school education services. For example, increases in placement fees charged by Hospital and Health Services or State Education Departments and the administrative costs to providers of managing large numbers of smaller placement providers counteract efforts by the Commonwealth to improve support for university training in these areas.

Case study 2 – end-to-end nursing program in Charleville (Modified Monash 7 region)⁸

UniSQ established a place-based end-to-end nursing program in Charleville in 2022. The program which, to our knowledge, is the only health program in Australia offered entirely in a Modified Monash 7 (i.e. very remote) region clearly illustrates the unique contributions that regional universities make to regional Australia and their unique contribution to the Australian higher education ecosystem. The program was established by engaging with the local community and regional Health and Hospital

⁷ <https://www.health.gov.au/our-work/rhmt>

⁸ <https://www.health.gov.au/topics/rural-health-workforce/classifications/mmm>

Service (HHS). Students enrol online, and are supported through additional regular and personal online support offered by the University, and undertake practical training at residential schools in Charleville. The local community, including the TAFE and secondary school, provides support for the program – by way of example, laboratory classes on structure and function are delivered from the state secondary school’s teaching laboratories with support from that school. Notably, South West HHS provides free placements.

Support from Southern Queensland Rural Health (SQRH) has been pivotal to the Charleville program. SQRH is a University Department of Rural Health (UDRH) funded through the RHMT program. It is unique among UDRHs in that it is a consortium involving two universities (The University of Queensland and UniSQ) as well as two HHSs (Darling Downs Health, and South West HHS). The place-based nursing program makes use of a clinical training site built by SQRH on Charleville Hospital grounds, as well as SQRH-owned properties to provide free accommodation to students attending residential schools, and is supported by SQRH clinical facilitators based in Charleville.

So far, 18 students including four First Nations students, are enrolled in the program, and they live in Charleville, Cunnamulla, Thargomindah, Quilpie, Mitchell and Roma. This cohort size is unlikely to be considered sustainable by a large metropolitan university and the program has higher per student costs than the nursing programs UniSQ offers from its Ipswich or Toowoomba campuses. However, it demonstrates the unique contribution regional universities offer regional communities.

RECOMMENDATION 5.1

We recommend the Review Panel considers a more tailored approach to the funding associated with rural and regional students to enable more place-based initiatives of the types described in these case studies to be established for the benefit of regional Australia.

Similarly, we recommend that the Review Panel considers whether the current Higher Education Contribution Scheme (HECS) system is meeting its original intent, and particularly whether it supports equity in access and participation and ensures that equity is sustained, post-graduation.

On a related note, we suggest that, to some extent, structural barriers to higher education for all Australians is a result of similar funding pressures impacting on secondary education. Indeed, in regional Queensland, there are some state secondary schools that either do not offer requisite subjects or are inadequately resourced to produce students with the Australian Tertiary Admission Ranks (ATARs) or prerequisites to enter university. While enabling and other pathway options may provide an alternative, the playing field for school leavers is certainly not level for regional students. The University of Queensland/UniSQ Medical Pathway is a good example in which positions were unable to be filled as a result of regional students having insufficient ATAR.

RECOMMENDATION 5.2

We ask that the Review Panel recommends approaching higher education governance and funding as a-whole-of government imperative that includes compulsory, vocational and higher education as parts of a single education ecosystem.