

# UWA Submission to the O’Kane Review



THE UNIVERSITY OF  
**WESTERN  
AUSTRALIA**

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## Introduction


The University of Western Australia welcomes the opportunity to make a submission to the O’Kane Review. We note the recognition of the absolute and relative strength of the Australian University sector in the Accord Discussion Paper. We also note the long-term time frame of the next thirty years taken by the Review. It is in this context that UWA provides its submission. UWA’s submission will complement, not replicate, those from Universities Australia (UA) and the Group of Eight (Go8). Our focus will be on high-level principles of enduring relevance, organised around a series of interlinked themes.

## Cooperative Federalism

Unlike the USA, Australia divides responsibility and funding for the University sector between State and Federal authorities. Funding for teaching, and for research, largely emanates from the Commonwealth, as does regulatory oversight i.e. through the Higher Education Standards Framework (HESF) and The Tertiary Education Quality Standards Authority (TEQSA). This is distinct from the legislative authority of some State Parliaments, whereby the University, as with UWA, is established by State Act and with a clear mission as detailed in that Act. Equally, the Federal level has a Higher Education Admissions Transparency Panel that assists the Higher Education Standards Panel, yet the context and conditions of university admissions are set through State education policies. The current debates about alternative entry and ATAR are a clear case in point.

Since the loss of the Educational Infrastructure Fund (EIF), there is no dedicated Commonwealth funding for infrastructure, which has left universities to look to State Governments for support. In place of a dedicated stream of funding, universities necessarily compete against other State priorities. While industry might be seen as potential source of support, this is rarely free of instrumental design or in a quantum that addresses both innovation and systemic maintenance. At least two States are currently considering questions around optimal size and structure of their universities, but in the context where funding and overall regulation sit beyond State authority. It is often noted that there needs to be greater collaboration between the VET (TAFE) sector and universities, and in this context, it is worth considering the differences in how federalism works. Funding, and to a significant extent strategic direction for TAFE, is delegated to States and with limited federal oversight, which is not the case for HE.

We therefore recommend that the Panel consider means by which federalism is facilitated to be more cooperative. Could the Compact between the University and the Federal Dept of Education (DoE) be nuanced to better reflect State priorities, including the missions of the universities, as well as state technological, educational and workforce priorities? Is there an opportunity for the Panel to consider the working of COAG in respect of aligning Commonwealth and State priorities in HE, in much the same way as in other domains such as health? The challenge is also in the ways in which departments respond to differing and multiple priorities. If Australia is to make strides in an education transformation that provides the nation with improved skills for economic, social and technological progress across the next thirty years, it will require integrated thinking and policies across several portfolios – education, health, training, research and planning. There is a need for coordination of government




investment into areas where there is an acute workforce shortage and rising social and economic need, and where universities are constrained by availability of work-based training opportunities and regulatory obstacles to increase student enrolments e.g. in teaching, nursing, allied health and social work.

## Access for Students from Equity and Non-Traditional Backgrounds

One of the greatest areas for reform is making HE accessible to more students from equity and non-traditional backgrounds. UWA believes that the current inequity is a reflection of wider (and widening) inequalities in society and that HE plays a major role in tackling this. It is also clear that this has persisted even through the massification of HE that flowed from the Dawkins Review and the participation targets of the Bradley Review. In percentage terms at least, participation in HE from non-traditional groups has not kept pace with the participation of students from mid-range SES cohorts. The issues are complex and are subject to multiple variables. Cumulative disadvantage that arises from membership of more than one equity group has shown to result in negative impacts at pre-access (readiness to study HE), access and participation in HE, as well as post-graduation outcomes. More research is needed to find ways to address this intersectionality and to better understand the social and institutional barriers that students face. In its [Five-year Productivity Inquiry report](#) the Productivity Commission noted that the period of the Demand-driven funding saw larger numbers of students from low-SES and first-in-family (FiF) backgrounds at university, and that by age 25, many of these were as likely to be in full-time employment as their more advantaged counterparts and in managerial or professional positions. The Productivity Commission further notes the question is not whether non-traditional students perform as well as more advantaged students, but whether they were better off at university compared to other post School options.

UWA supports the calls for the introduction of a holistic system for lifelong learning that would be based on the introduction of the Universal Student Number. Such an approach could establish a Lifetime Learning Account that, recognises RPL, micro-credits as well as formal qualifications, and which would be funded through government i.e. CSPs as well as through industry investment. In principle, this could be extended to domestic HDR students who are increasingly being drawn from a mature cohort and from professional areas where part-time study is more appropriate. This lifelong learning approach should be extended to provide more exit routes for HDR students including graduate certificates e.g. in research skills. RTP funding might be considered here as students may well be facing HECS debts from previous studies. As the holistic lifelong learning proposal is coming through other submissions, we will not go into further detail, but note our staunch support for such an integrated approach.

UWA asks the Panel to consider how the DoE might reflect on existing initiatives which seek to address the issue of equity and non-traditional students. Firstly, in a context where there is little or no family history of tertiary education, the punitive approach of the requirement to pass more than 50% of the first eight units, or lose the CSP and HELP loan, ignores the enormous cultural and physical barriers to successful participation among non-traditional students, and that some success in university can be a springboard to the success of others in the family or indeed of later personal success. UWA applauds the Commonwealth initiative of providing additional CSPs for students in non-traditional contexts or in key workforce areas. We would




see a strengthened approach as one where these places are uncapped – a partial return of the DDS - but tightly tied to clear eligibility, and for those students a move towards completion funding, so that Universities are incentivised to provide fuller support to non-traditional students and rethink pedagogy and assessment. The Federal government already provides a Tertiary Access Payment (TAP) for students; however we know from High School engagements that students and parents are frustrated at how long the associated Youth Allowance becomes sufficient for students to live independently away from home. This causes a loss of academic momentum and in effect, delays entry to university by up to a year. This impacts most on regional students and UWA would support earlier provision of Centrelink support for regional students who are intending to go to university. We also recommend the extension of the TAP system to scholarships for indigenous and equity students to discount the student financial contributions through university fees. For ease of administration this could be built into the Maximum Base Grant Allocation (MBGA) and the usual University processes of controls and reporting including TCSI data which can cross-reference to ATO data. It is also known that debt liability is a greater constraint in low-SES contexts and perhaps some analyses of international practices of partial debt write-offs may be warranted.

It is also important that non-traditional students should be encouraged to aspire to Go8 universities and that e.g. for indigenous regional and remote, low-SES and CALD students, there is much less opportunity at High School to study ATAR and other courses that typically lead to university entry. In response and to shift the dial, we would favour a more positive debate about experiential and alternative entry pathways. Our own experience at UWA with indigenous students and at the Albany campus, as well as much research nationally, shows that Enabling Programs that reach into communities (regional, indigenous, low-SES) break down barriers to HE participation and promote successful engagement. This needs to be targeted however to ensure the problem of increasing participation yet static percentages of engagement of non-traditional students is not repeated. There is a compelling case for these programs to be ringfenced to non-traditional cohorts and for this to be a function of funding and the Compacts.

UWA would support a longitudinal initiative that addresses when aspirations are firmed up, which is a lot earlier than when universities are funded e.g. by HEPPP, to engage future students. Research shows aspirations firm up from year 7 and then course and institution later from year 10 onwards.

## **Work Integrated Learning (WiL)**

UWA acknowledges this will be a major feature of the DVC-A submission from UA. For the purposes of the UWA submission, we wish to make a number of high-level points. Firstly, WiL has to be seen as a lifelong exercise that starts in school and extends through and beyond university study. At High School the focus of what are called Workplace Learning Programs (WLP) is very much on the vocational/VET stream of students, rather than those focussed on university entry. A framework for industry engagement in High Schools, as well as early socialisation of High School students to the WiL agenda in HE, will facilitate more HE-bound students understanding the employability pathways at university earlier in their undergraduate studies. At university and through government initiatives, the focus on final year undergraduate study is too narrow. WiL has to be scaffolded through a series of class-based



activities, industry mentoring and leading to placements and internships. Much of the focus and funding has been at the level of internship only. UWA welcomes the work of the UA WiL group in developing a comprehensive WiL strategy. The obstacles and barriers to greater industry engagement need to be addressed by government and regulatory bodies. For small and medium enterprises (SMEs), there is little capacity to engage at all forms of WiL or offer internships. What kind of tax incentives or other financial inducements can be developed to upscale the engagement of this sector of industry? In other OECD countries, there is a more intentional approach to employability and to WiL, whether it be the UK degree apprenticeship model or the practice of cooperative or sandwich degrees, where students spend a year or more in paid internships - earning while learning. What financial incentives can be brought to the sector to encourage this in Australia? DoE should commission a study of international best practice to consider for implementation in Australia including a benchmark to clarify the differential between paid and unpaid internships. Finally, we recognise that WiL and broader employability initiatives are important means of developing student skills and enhancing social capital for all students, including those from non-traditional backgrounds.


## **Institutional Diversity**

There is, arguably, greater diversity in the Australian University sector than is widely recognised. Yet, as some of the points above suggest, there are ways in which centripetal forces might be lessened by a linking of KPIs to the specific focus of university missions and centring these within the Compact. Currently, all funding and regulatory regimes address universities equally. Understanding the ambition of the O’Kane Review to look thirty years forward, UWA notes there is less diversity in Australia than other OECD countries in terms of specialisation e.g. undergraduate-focussed universities; graduate universities; research-intensive universities or functionally specialised, as well as no systemic frameworks that exist, for example, in the USA with systems that link Community Colleges to universities. There is no mechanism in Australia for consideration of the possibilities of institutional specialisation, beyond the periodic reviews such as this O’Kane Review. There is room for a body or Commission for HE in Australia that could, inter alia, consider these system-wide questions.

## **Over-Regulation**

Australian universities provide one of the largest export markets for Australia and operate at low risk. They have shown the capacity to adapt and flex during the pandemic. Australian HE is regarded as high quality around the world, and this is in part the product of the regulatory contexts in operation. TEQSA has a key role in ensuring quality and that students get an equitable and high-quality experience.

UWA argues however that the level of regulation and regulatory creep is not consistent with the importance and risk profile of the sector. UWA recognises that TEQSA has a much broader remit than the University sector and does adopt a risk-based matrix, yet it is not always clear that the assurance regime is sufficiently discrete to each type of HE provider. TEQSA has made many significant improvements and shown great flexibility during the pandemic, but in respect of overseas online study, withdrew this flexibility beyond June 2023. Student visa-holders will not be able to study more than one unit per semester online or more than 1 in 3 units of their degree. This stifles the innovation of students studying for one year in their home country and




then coming onshore to Australia to complete their studies. Universities have found new ways of addressing student needs through a greater mix of online and blended study and UWA does not see the TEQSA Directive as helpful or based in educational philosophy.

There have also been cases of institutional re-registration affected by a prescriptive approach to the Scholarship of Teaching and Learning (SoTL) which is confusing quality enhancement for quality assurance.

One of the more worrying developments has been the cost recovery exercise, whereby TEQSA charges universities for its core services of CRICOS, re-registration and for conditions. We do not mean to suggest any poor practice, but we do not see the wisdom of linking financial gain to the business of accreditation. Moreover, universities are subject to and benefit from, the accreditations provided by professional bodies, and these are a considerable impost on each University. We acknowledge UA oversaw an excellent agreement with Professions Australia on an outcomes-based approach. Too many professional bodies utilise an inputs-based approach where it is the number of professors or other forms of human or physical infrastructure that is measured, rather than the outcomes for students. UWA would welcome the Panel coming to a view on whether a revamped approach to professional accreditation can be overseen by DoE or TEQSA. Can the processes of professional accreditation, for example, be accredited by TEQSA so that the workload on universities is reduced and there is less duplication?

## **Sovereign Research Capacity**

Australia needs to continue to create new knowledge to support rapid advances and transformation across a range of industries. Strategy, administration and funding of Australia's sovereign research capacity needs to be strengthened and streamlined, incorporating overarching principles of supporting sovereign capability, resilience, harmonisation, rationalisation and scale, internationalisation, and respect for the research community. As a further principle, we call into question the current need for international student fees to subsidise and support research endeavours because of the frequent requirement for institutional co-funding, a requirement that encourages institutions to compete in offering support that reduces the financial sustainability of research. Concurrently, we call for recognition that low engagement between universities and industry is not for lack of incentivisation of higher education, but that industry is insufficiently incentivised or encouraged to engage with universities. A significant proportion of research funding to universities is supported by government investment, however this has been continuously declining as a proportion of GDP. Nevertheless, the current administration of research funding lacks overarching strategy or harmonisation, resulting in costly duplication of effort both in government and in universities. UWA calls for streamlining of the research funding ecosystem such that funding bodies incorporate all of discovery research, mission-based research, and industry collaboration research. This could sit within a single overarching research funding administrative body, or two with distinct emphases (e.g. health/non-health). However, streamlining both application and peer review is critical and should include elements such as National Persistent Identifiers and standardisation of application and peer review processes. This, together with enhanced transparency, assurance of peer review, and incorporating



equity considerations (e.g. with respect to timelines) will demonstrate respect for the research community and enable increased research productivity.

## Research Governance

Under current models, universities each provide independent services to meet research regulatory and policy requirements. Research governance offers opportunities for an overarching agency that can reduce inefficient duplication within the sector, with opportunities for such an agency to take a lead role in guidance for regulatory principles and policy advice – for example, foreign interference, integrity, ethics, biosafety, and implementation of a FAIR (Findable, Accessible, Interoperable, Reusable) research strategy in Australia. Overarching regulatory governance could provide much needed scale, reduce costs, and speed regulatory processes. Identifying efficiencies is critical for the long-term sustainability of Australia's research governance systems.


## Research Infrastructure as an Investment in Australia's Sovereign Capabilities

There are further opportunities for an overarching research agency to lead development of a scalable and linked system of national research infrastructure platforms, including but not limited to NCRIS. Development of incentivised industry co-funded or shared research facility models would foster innovation and knowledge sharing, while reducing costs to government and higher education. However, incentivisation of industry (rather than higher education) is most critical to successful industry involvement. Essential infrastructure investment for a digital research transformation at scale is needed to maintain our national research capability. Other regions are investing heavily in open science (e.g., European Open Science Cloud) and such platforms facilitate internationalisation of our research.

## Research Training Pipeline

Researchers are a national asset for resilience and sovereign independence, and as such, a robust research training pipeline is critically important for the health of research within universities and for the national economy and technological foundations. Australia is the third largest destination for international HDRs and the Go8 delivers the highest proportion of research graduates. The RTP restricts the use of funding to support international students to 10% yet there is a diversified and increased demand from international research students who will go on to build international research collaborations and enhance the Australian workforce. UWA calls for more engaged “soft” diplomacy, focussed on education at federal and state level in order to strengthen existing relationships with international partners and multi-national organisations.

Research training should be considered systemically, beyond PhD training, into early postdoctoral careers. UWA calls for an acknowledgment that around 80% of PhD graduates will not remain in academia, and a reframing of the narrative around the value that a PhD provides to our national skilled workforce capacity. This may require reimagining higher degrees by research such that development programs (e.g. entrepreneurship, leadership), which could be overseen by a strategic national office for research training, provide PhD



graduates with the skills and knowledge required to succeed in non-academic careers. An overarching strategic national office for research training would enable identification of national priority areas for PhD training to respond to emerging trends and could incentivise to build national capability. Such an office would also be able to reduce functional replication around the sector, including in areas of supervisor training and registration, industry internships, and development of transferable skills.

The RTP internships requirement for additional completions weighting is complex, costly to institutions and its structure makes engagements with industry more costly and time consuming. The emphasis on student securing internships in areas related to their area of research contradicts what is known i.e. that industry value HDR graduates for wider transferable skills, and most will find employment in areas not related to their specific area of research. A more flexible WiL approach would lead to good outcomes and less pressure on IP requirements that lock students into sometimes difficult requirements for dissemination of their research. Engagement of industry and government in supporting the development of this highly skilled workforce is critically important, and UWA calls for the Accord to reimagine incentives for industry to support HDR training so that there is increased demand and support for PhD training from sectors outside of higher education. However, UWA considers differentiation and the ability to meet regional needs to be important, and that student selection and approval processes should remain distributed. We support the development of sovereign capability in our workforce through ensuring that Australian early career researchers can become part of the global knowledge system and recommend national development of expanded pathways for international exchange in research training. Finally, we strongly support that adequate, indexed financial support is provided via PhD stipends, in order to facilitate PhD completion and reduce the burden that incomplete PhDs and personal and mental health concerns place on students.



