

DVC A Submission to O’Kane Review

April 2023

Introduction

The DVC A network that is organised through Universities Australia (UA) has worked on seven papers that address many of the bigger issues in Australian learning and teaching (L&T) as well as the student experience. The lens has been to address many of the immediate areas for reform, as well as position the sector better to address many of the social, technological and economic challenges that will require new and higher- level skills over the coming decades. Core to our focus has been to recognise the need to increase participation in Higher Education (HE), especially from non-traditional groups to promote greater social equality.

The seven papers have been authored by members of the DVC A Executive group, supported by other DVCs. The framework of ideas was generated through a DVC A Plenary meeting and further crystallised through an engagement with Mary O’Kane. The wider DVC A Plenary has been widely consulted as each successive draft has been circulated. There is strong consensus on the ideas expressed in these papers from across the network. UA has also drawn on the papers for its formal submission. The seven papers do not form part of the formal UA submission but stand as an expert contribution on L&T by the UA DVC A network.

The seven papers cover:

- A. [Equity and Access](#)
- B. [Lifelong Learning and Microcredentials](#)
- C. [Work-integrated Learning](#)
- D. [Excellence in Learning and Teaching](#)
- E. [Academic Workforce](#)
- F. [Funding and Governance](#)
- G. [Future Proofing Australian Universities](#)

The DVC A Executive comprises:

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A. Equity and Access

Equitable access to higher education is fundamental to the social and economic prosperity of Australia. It is important that people from under-represented and diverse backgrounds are provided with the opportunity to participate in higher education without impediment from institutionalised barriers and socio-economic disadvantage. Inclusion enriches everyone and creates more imaginative and sustainable thinking and problem-solving.

1. The Review Panel should propose the expansion and simplification of programs designed to support the success of students from under-represented groups.

The Higher Education Participation and Partnerships Program (HEPPP) is an example of an initiative which has been successful in improving student success. However, that success has been limited by inadequate resources being directed towards these types of programs that are sometimes narrow in scope. Further, the administrative load associated with the management of multiple schemes with different reporting requirements hampers the effectiveness of the schemes. Therefore, we advocate for the expansion and simplification of equity related programs to avoid narrow categorisation of students from under-represented backgrounds and provide greater scope for funding being utilised more effectively on system solutions designed to facilitate greater access, participation and student success.

2. The Review Panel should take a holistic approach to consider improvements to the whole ecosystem which prepares students for success at University.

Preparation for University commences with early childhood education through to the whole range of pathways and enabling programs. It is not sufficient just to concentrate on student success at the University level. Successful learning pathways are diverse and non-linear. Learning entitlements that span across VET, HE and short courses would allow learners to make better choices at any point in their learning journey. Students from low SES backgrounds and from rural and remote regions face a range of challenges including lack of affordable and safe housing, health challenges, poor nutrition and inadequate community infrastructure, such as reliable internet access. All of the steps along a student's journey to higher education must be supported. It is important to understand that improving access to university alone will not improve outcomes unless all of the institutionalised impediments to student success are addressed.

3. The Review Panel should reconsider how success should be defined for under-represented students participating in higher education.

Measures of student success focus on the completion of whole degrees. A student who manages to pass some aspects of higher degree study without completing the degree will still have gained skills and attributes from their study experience. Universities do all that they can to support degree completion, but where this is not achieved it should not be defined as failure. It is just one part of that person's lifelong learning journey which could take many different directions in the future. When a person who is first in family attends university that family is forever changed in terms of how they perceive the range of opportunities for learning available to them. The Job-Ready Graduates (JRG) Package emphasis on first year success is an example of not considering the challenges faced by many students who do not have access to quality primary and secondary education. The 50% pass requirement disproportionately impacts students from under-represented backgrounds. There should be a range of measures available to demonstrate positive outcomes such as employment prior to graduation, transfer to other post-secondary pathways and/or evidence of generational impact.

4. The review panel should recognise the value of regional universities providing opportunities for Indigenous Australians and other under-represented groups.

All Australian universities are committed to improved access and equity for under-represented groups and look forward to further improvement. Regional universities are very well placed to offer students opportunities for higher education in their local communities. This enhances the support available from family and friends which is important for student well-being and success. Graduates of regional universities are also more likely to remain in region and contribute to the economic development of regional areas which in turn improves the opportunities available for people who live in regional Australia.

B. Lifelong Learning and Microcredentials

The University sector is confident that Microcredentials (MC) can be a valuable part of the broader education sector's response to the worsening skills shortages and skills gaps in Australian and global workplaces. Learners will increasingly be less likely to undertake the traditional linear education journey from school to university and into continuing employment. Universities must adapt to meet the lifelong (and long-life) learning needs of contemporary society. As part of their response to this challenge, universities are already deploying MC in genuinely learner-centred ways, to develop an enhanced tertiary education ecosystem with the capacity to sustainably reskill the Australian workforce to meet the challenges of disruptions brought by research discoveries, new technologies, especially in AI and automation. MC will play an important role in strengthening the value proposition of university for students and society, to provide a necessary reset to learner engagement. Finally, MC offer significant potential to increase access and success in education for women and traditionally disadvantaged equity groups. That equity function will require learner support with some form of extension of commonwealth funding. Despite this array of possibilities; the way the government, and some providers and employers, are currently positioning MC risks limiting the ability for Australia to deliver on their potential.

1. The Review Panel should propose a role for microcredentials as part of an integrated education ecosystem of learning opportunities.

Universities would be keen to assist the Panel in scoping out the role of MC in the education ecosystem. They are not a replacement for traditional qualifications (they offer different outcomes to long form degrees). Their value is not as a way of breaking up or atomising existing qualifications which require integration in learning. Rather they offer a means to develop and credential capabilities that complement those qualifications in several ways, and to increase the agility of the sector to respond to Australia's future workforce needs. MC enable universities to increase the range of entry points to higher education, through diversification of recognition of prior learning and credit pathways. MC also offer opportunities for universities to credential co-curricula learning and thereby increase employability and resilience of graduates. MC can play a valuable role prior to engaging in those qualifications – offering new 'for credit' pathways and entry points/pathways. (MC recognised/stack into qualifications). MC also play a valuable role prior to entering new areas of work (career transitions) (MC recognised/stack into recruitment). MC play an important role within qualifications to add emerging / additional skills that become relevant in the workforce and to facilitate future career transitions and learning. Perhaps most significantly MC provide important learning opportunities post qualification to meet emergent skills gaps in workplaces, and to reskill to address skills shortages.

Because MC as articulated above have a role in relation to all players in the post-secondary education ecosystem the 'frameworks' developed for MC must also operate across all provider types (VET / HE / Industry Continuing Professional Development).

2. The Panel should recommend the development of shared national frameworks and platforms for MC but not introduce new regulatory constraints nor should it include MC within the AQF.

Because MC need to be developed in response to, and in anticipation of, rapidly emergent and sometimes ephemeral, skills needs, they cannot be regulated in the same way that other educational offerings are. MC offer much needed capacity for the sector to innovate and manage product risks in new ways. Over-regulation will stifle the agility afforded by MCs for the sector to respond to needs of society and the economy. At same time, to ensure the MC market operates efficiently to meet the needs of learners and employers, there needs to be increased

transparency and comparability of MCs, in terms of product design and information. MCs must also provide learning that demonstrably meets learners needs, is quality assured and reliably credentialed. For universities, as self-accrediting institutions this is a familiar responsibility. The development of national government oversight platforms would enable gatekeeping of 'providers' to assure quality. While some work has occurred this work now requires appropriate funding and more significantly – appropriate governance from the sector, to ensure they remain fit for purpose and support the vision of the Accord. These platforms could usefully extend to national credit precedent data bases to facilitate a viable role for MC in Australia's future education ecosystem.

To realise full potential of MC, they need to be recognised and stackable into other qualifications (see 1 above) and explicit in career progression in workplaces. For Universities such RPL (recognition of prior learning) is fundamentally based on AQF level of outcomes and volume of learning and can be facilitated at scale with agreed precedent RPL databases. These features are already embedded in the draft National MC Framework. The regulatory framework for VET requires review to remove the restriction of RPL to individual cases, and the requirement that all credit must be on the basis of an existing skills package.

In addition to frameworks and platforms new forms of accessible data and insights are needed to inform the prioritisation and planning of development. The work of the JSA could be usefully directed towards this.

Case Study:

- *JSA's new remit to undertake capacity studies will be helpful in informing frameworks and pilots of new microcredential initiatives to support the strategies proposed in this paper. JSA will look at detailed workforce needs, including skills needs for new industries and where skills transferability may be possible, of which microcredentials could play a key role in reskilling and upskilling. The upcoming clean energy capacity study may be an example of this. [clean energy capacity study draft terms of reference.pdf \(jobsandskills.gov.au\)](#)*
- *Existing products that currently provide indicators of demand for skills include the skills priority list and employment projections, including a regional lens through NERO, which can contribute labour market insights to where microcredentials could be developed to support areas of skill demand.*
- *The Australian Skills Classification and categories might usefully inform a common language for skills, that can make a direct connection to skills taught in microcredentials, the occupations they relate to, and potential transferability across the labour market. In connection with statistical data such as university student completions, an understanding of skills supply to the labour market may be possible.*
- *Developing a picture of skills supply from education, in combination with existing demand models, could help to identify labour market imbalances, where education design options such as microcredentials may be best placed to address imbalances in a targeted and efficient way.*

3. Through the Accord, the Review Panel should promote the role of MC in addressing access and successful participation in education and work by all (equity) groups in society.

MC offer reduced barriers to access and participation in learning and can be an important strategy in enhancing post-school educational participation by all members of society. They are typically shorter and flexibly delivered so accessible to remote learners and those with work and family commitments. They have the potential to be particularly powerful in building the participation rates of women in education and also in facilitating accesses to the workforce in areas where women may be under-represented. In comparison to longer qualifications, MC

could require a lower financial investment to access which is an increasingly important consideration for many in society. The 'equity' groups for higher education are often those who face the highest barriers to participation in formal qualifications regardless of the support provided. These learners are those most likely to be unable to afford not to work or maintain their family care responsibilities. They often have the least confidence and the most experience of failure in formal education settings. However, to participate, new MC learner support mechanisms are needed to facilitate participation by those unable to bear the current 'user pays' approach. MC often have no pre-requisites so previous educational disadvantage is less of a barrier. Successful completion of relevant MC is already recognised as prior learning or as credit towards AQF qualifications by many universities. This provides an additional non-traditional entry pathway that should be promoted to those members of society not engaged in formal learning pathways. MC that focus on building academic success and literacy skills have been shown to enhance both access and success in university students. In light of the potential benefits for participation by equity groups in education, the Accord should seek to extend full – not discounted commonwealth funding to MC for equity groups in particular and learners in priority professions and areas of skills shortages.

Illustrative example: That MC fee help support could take the form of a 'Lifelong Learning Trust' (see UA discussion paper) with contributions from government, industry, and private equity; learner 'vouchers' or other forms of industry or equity support (see 4 below).

4. Work with employers to incentivise and support (fund) employee participation in MC learning opportunities and create a learner support ecosystem.

A key to the success of MC in addressing skills shortages and gaps and equity participation is the role of employers and workplaces. Often the contribution of industry (or as it should be more broadly community) to MC is positioned as 'identifying the skills gaps for MC to be developed to address'. This can usefully extend to industry co-development and co-delivery and even co-accrediting with VET and HE partners in some models (e.g. the Institutes of Applied Technology in NSW). However, the Accord needs to establish a far more significant role and responsibilities for industry in MC. Businesses require new models, standards and support for employees to 'learn and earn'. In many industries, training workload allocation is now entirely devoted to mandatory compliance training (WHS / cyber safety etc.) with none allocated to relevant upskilling.

Priority industries (skills shortages) and SMEs should be supported through allocation of funding to support MC training for workers in relevant skills. This could be supported by government by an extension of programs such as the ISLP to MC delivered by self-accrediting (i.e. low risk) providers such as universities. There is a significant role for industry to play in providing funded placements/internships and Work-integrated Learning. This funding could be through inclusion of relevant MC (e.g. those in identified priority skill areas etc.) in relevant apprenticeship schemes. Given the important role SMEs play in the Australian economy and the particular challenges their employees face in relation to upskilling targeted support and incentives to facilitate participation in MC is required. Most importantly employers and industries need to be encouraged to explicitly and visibly integrate achievement of relevant MC in their promotion and recruitment practices and policies and ensure learners are aware of the value proposition the MC holds for their career progression.

C. Work-integrated Learning

Work-integrated Learning (WiL) directly links student learning to work and career through effectively designed experiential activities relevant to the students' discipline of study. It is an educational approach involving three parties – the student, educational institution, and an external partner – that uses authentic experiences to allow students to actively integrate theory with meaningful practice as an intentional component of the curriculum. (National WiL Strategy Working Group, 2023)

WiL uses real-world experiences to help students apply and adapt their learning to current and future work. WiL includes work-based activities such as placements and internships and work-associated activities such as industry projects and consultancies. Novel forms of WiL reflect the diversity of work and may be online, intensive, multidisciplinary or directed at entrepreneurship or not-for-profit programs.¹

The critical importance of WiL for students, employers and industry, and universities was described in the landmark [National WiL Strategy](#) (2015); a collaboration between the university sector (Universities Australia, ACEN) and industry peak bodies (AiGroup, Australian Chamber of Commerce and Industry, Business Council of Australia). The value of WiL for all its stakeholders has been described in decades of research. WiL is effective in orienting and preparing students for work and careers, in making learning relevant to students and fostering engagement, and in increasing graduate employment outcomes. WiL is valued by industry (including community and not-for-profit organisations) for recruitment, developing new opportunities and as a contribution to future workforce. WiL constructively connects employers, organisations, students and universities and contributes to deep and broad relationships that inform curriculum and collaborative research.

WiL also offers a mechanism to connect students to areas of high priority in workforce development. Alignment of WiL activities in university courses can be aligned to identified areas of high workforce need; for example, those identified in the Australian Government's [Skills Priority List](#). Exposure to these industries creates awareness of opportunities for graduates and could be further encouraged by priority access or incentives.

WiL is explicitly identified in the University Accord Review Panel discussion paper (section 3.2.4) as a mechanism for improving collaboration with industry and graduate employability. The discussion paper notes the role of workplace WiL (placements, internships), concerns regarding capacity to scale-up WiL participation and limitations imposed by restricted access to WiL for some accredited fields.

Concurrently with the Accord process, Universities Australia has reconvened the National WiL Strategy Working Group with its original collaborators to refresh the National WiL Strategy. The new Strategy seeks to make WiL an expected component of higher education across all disciplines and to enable delivery at scale. The Working Group is developing recommendations for key stakeholders – universities, industry, government – that describe their contribution required to achieve widespread and high-quality WiL practice. A preliminary draft of the 2023 National WiL Strategy will be provided to the Accord Review Panel.

¹ ACEN Resources include a wide range of innovative WIL activities from Australian universities: <https://acen.edu.au/resources/>

The DVCA Plenary has focussed recommendations for WiL on three institutional issues: participation, management of WiL, and data and regulation.

Participation

WiL creates costs for employers and students which limit participation in WiL – particularly in supervised internships or placements. As noted by the Review discussion paper, industry supervisory capacity is a major limitation to increasing graduates and, therefore, workforce in some accredited fields. Direct funding to employers to offset the costs of supervision is available in some industries, notably healthcare where this is a major cost for universities. Solutions to increase graduate numbers in specific professions will need to balance the core competencies for safe practice with support for new graduates in the workplace, and balance responsibility for national workforce development with the distribution of cost between employers, Government, universities and individual students. Effective solutions will require facilitated discussion for each sector.

While larger enterprises can absorb costs, smaller enterprises and those with added challenges such as regional and remote operation have less capacity to offer work-based WiL or participate in other forms of WiL. Options for incentives to expand industry participation could include direct subsidy per placement, tax concessions or related mechanisms, a student allocation that follows each enrolment or subsidised programs at discipline or institutional levels. Any incentives should leverage existing mechanisms to ensure quality and accountability, such as the Higher Education Standards, while minimising administrative burden. Options will need economic modelling to avoid perverse incentives.

1. The Review Panel should recommend development of options for targeted incentives to widen and increase industry participation in WiL

Most Australian university students work alongside study either part-time or full-time. Placement and internships that require intensive time are a direct cost to students notably where they interfere with existing commitments for work or caring. This can be a major disincentive to student participation further entrenching economic disadvantage and disproportionately affecting equity groups. Allowances for the cost of participation in WiL could be considered as part of existing payment schemes (Youth Allowance, Austudy) or as part of tax concession arrangements where applicable.

Targeted incentives could also assist in connecting future graduates to regional areas where recruitment is challenging. This should be considered as part of a package which also incentivises uptake of graduate positions in target professions such as healthcare in rural and regional communities. Incentives could include cost-of-living subsidies and or HECS-HELP debt reduction.

2. The Review Panel should recommend investigation of options for targeted support for students to complete work-based WiL

Management of WiL

WiL is intrinsically complex as it requires three-way relationships between universities, industry and students. Each of these stakeholder groups are complex and diverse in their own right. University-industry relationships are often multi-dimensional including education and research and may operate across diverse disciplinary groups. Emerging models in Australian universities and prior work on leadership for WiL suggest that specialist expertise in industry relationships and/or industry centres within institutions make partnerships more robust and sustainable.

Strong, collaborative relationships also provide a basis for further development of WiL. Discussion of roles and responsibilities in current delivery opens a channel to explore the role of WiL in lifelong

learning and the interplay between foundational, advanced and on-the-job training. WiL is a practical vehicle for developing strategies for intentional workforce development.

3. The Review Panel should recommend a national dialog that:

- **sets shared expectations for university-industry WIL collaborations and quality standards**
- **connects WIL opportunities to intentional workforce development, especially in areas of national skills needs or emerging fields**
- **creates mechanisms for regular university-industry discussion on WIL, future skills and employability**

Data and Regulation

National data on WiL is limited and insufficient to provide a clear understanding of provision, participation, quality and impact. Recent inclusion of a question set on WiL in the Graduate Outcomes Survey has begun a longitudinal dataset but participation by universities remains optional. Deeper data, such as the level of activity in areas of high skill priority, is not collected systematically. The existing classification of Work Experience in Industry (WEI) units further confuses data capture as it is based on eligibility for HESA payment rather than a recognisable description of WiL. Limited data constrains strategic decision-making and limits benchmarking for universities and industry.

4. The Review Panel should recommend co-ordinated and longitudinal data collection on WiL provision, participation, quality and impact leveraging existing instruments including the Graduate Outcomes Survey, Student Experience Survey and HESA reporting of provision and enrolment.

In parallel, micro-schemes have created additional management burden. The National Priorities and Industry Linkage Fund (NPILF) created an additional regulated scheme without providing any new support or facilitation to achieve step-change. NPILF overlaps with other mechanisms such as University compacts. While focus on university-industry linkage is welcome, this should be achievable without diverting resources into additional administrative overhead.

5. The Review Panel should recommend consolidation of administrative and reporting arrangements for WiL to reduce the cost and burden on industry partners and universities.

D. Excellence in Learning & Teaching

As noted in the Accord Discussion Paper: “strength in higher education teaching is a critical element in ensuring strength in the sector as a whole. It is also crucial that the skills students learn in higher education are applicable and useful for the jobs they will hold in the future” (p.12).

One influential commentator, Sally Kift, wrote in 2016 about the “decline and demise of the Commonwealth’s strategic investment in quality learning and teaching”². Whilst one argument might be that quality learning and teaching (L&T) is more the responsibility of individual HE providers than government, this raises key questions as to the comparability with research, which is supported and incentivised through Federal funding.

The record, over many years, and across both sides of Federal government, is of inconsistent support for quality teaching and learning. We have seen bodies created and disbanded with depressing regularity. We have had the Carrick Institute which was replaced by the Australian Learning and Teaching Council (ALTC), which in turn was replaced by the Office for Learning and Teaching (OLT). In 2016, the OLT was disbanded and the responsibility for the specific area of the Australian Awards for University Teaching (AAUT), as well as a Learning Repository, was transferred with a much-reduced budget to Universities Australia (UA). Government funding for this has now completely ceased and the AAUT is funded through UA reserves and in future through voluntary University levies. Funding which at its peak was some \$88m has been reduced to zero from the Commonwealth government.

Unlike other countries – NZ with Ako Aotearoa and the UK with AdvanceHE – Australia now has no central infrastructure for Quality Enhancement (QE). We have seen the regulator, TEQSA, move partly into this space with its prescriptive approach on the Scholarship of Learning and Teaching (SoLT), which we would contend is a confusion between regulatory focus and the diversity of approaches appropriate for QE. AdvanceHE works with many Australian Universities to provide a system of professional recognition, at varying levels, against a global Professional Standards Framework (PSF). Other sector bodies such as the Council of Australasian University Leaders in Learning and Teaching (CAULLT) and the Higher Education Research and Development Society of Australasia (HERDSA) do valuable work in specific areas.

We have no body that integrates all these particular initiatives. It is also apparent that sector-wide innovation is not encouraged by this approach to L&T and productivity is reduced as each academic, department, professional collectives (e.g. law academics) and University, develop specific initiatives. By contrast, national and collaborative work creates synergies that accelerate progress. The ALTC/OLT has many good examples such as the Learning and Teaching Academic Standards (LTAS) project, first year transition, and work on standards for sessional academics. This further strengthens the development of data-informed approaches and rigorous evaluations.

Collaborative effort is particularly urgent to respond to a changing external environment. The demands of digital education, life and work, challenges to conventional career paths for graduates and increasing pressure on the academic workforce are wicked problems that are not easily solvable by individual institutions. An independent national centre creates a national mechanism to develop and share effective responses which are otherwise fragmented. National status and funding would confer authority to lead and incentivise in-kind investment and participation. An independent national Centre would operate collaboratively with the sector regulator, TEQSA, and advisory and governance bodies including the Higher Education Standards Panel and the Australian Qualification

² Kift, S (2016). The decline and demise of the Commonwealth’s strategic investment in quality learning and teaching. *Student Success* 7(2), 1-9 doi: 10.5204/ssj.v7i2.336

Framework. At present, Australia has no national body nor mechanism to develop sectorial advice for many priority areas such as a national lifelong learning strategy or the interaction between vocational and higher education. Channels for collaborations are particularly limited where issues span across provider groups (public and private/NuHEPs) and sectors (secondary, vocational and higher education providers). Critically, a National Centre for Student Success offers a mechanism to grow collaboration between vocational and higher education. Although independent function, funding and governance has pushed vocation and higher education apart, focus on student success creates a shared central goal. Development of a shared quality agenda between these sectors would enable a holistic post-secondary education system.

It is the position of the DVC As that this is a situation that the Accord Panel must seek to resolve if we are to address the transformations and innovation agenda required to create a culture of best practice in L&T that is appropriate for students entering HE from less traditional backgrounds, including Indigenous students; for encouraging lifelong learning; for development of skills and knowledge for the new careers of the future; for the integration of appropriate technologies for contemporary learning; for the design of assessment that address the suite of intended learning outcomes and which ensures, especially in the context of Artificial Intelligence (AI) the integrity of assessed work (Discussion Paper questions: 8, 15, 32, 39 and 42).

There is clearly a difficult issue to address regarding budget discipline, especially in the early years of the Accord. In that vein, the DVC As propose an incremental and stepped program to address the broader agenda. It is clear there are immediate, as well as medium-term issues to address.

Proposals

Immediate

- 1. To create a National Institute for L&T or a National Centre for Student Success (or some other title, and possibly incorporated into a wider HE Commission) to provide:**
 - Thought leadership through the commission of work on issues of strategic significance to HE to inform policy development and practice in L&T;
 - To manage a suite of awards to celebrate, recognise and value teaching excellence and programs that enhance student learning. The DVC As feel that the AAUT citations provide recognition to early career teachers and also value the profile given to team teaching through program awards, as well as the symbolism of the Neville Bonner award for Indigenous staff; the Career Achievement Award and the Australian Teacher of the Year Award. We seek to strengthen the existing system through greater dissemination of the work of the awardees, as well as encouraging them to provide sector leadership of projects.
 - To provide a framework for the dissemination of innovations and encouragement of cross institutional collaborations and professional development in strategic areas of L&T

Medium term

- 2. The National Institute to provide:**
 - a framework and funding to support secondments and fellowships for leading practitioners to address significant federal educational priorities.
 - The provision of grants to academic and professional staff, drawn from within and across Universities, to explore innovations in L&T and provide a pipeline of future leaders in L&T. We note previous grants issued under the OLT for larger collaborative and sector-wide projects were classified as category 1 research grants. This was important recognition of

the impact and value that sector-wide learning and teaching research projects can effect and provided a clear signal of the value and trust placed in high quality learning and teaching research by the federal government. At the same time, this placed some distortions into the grants system as some of the bids were re-packaged research grant applications. We would see the role of a peer-based National Institute to design a better model than existed previously.

We believe basing the argument for a National Institute in the recommendations from the O’Kane Review will help to remove the policy fluctuations that have blighted the Carrick, ALTC, OLT and AAUT organisations. We propose that the costs of such a National Institute be limited in the early phase and draw from the voluntarism of AAUT awardees, as well as recognised leaders in L&T across Australia. Funding to stabilise the AAUT and provide the basis for commissioned work would be necessary. The National Institute could be modelled on the National Centre for Student Equity in HE (NCSEHE) and work in partnership with that organisation.

E. Academic Workforce

In order for Australia to maintain its reputation as one of the leading higher education sectors globally it is essential to foster a well-qualified and highly engaged academic workforce. This investment in attracting and retaining people will support the sector's next stage of development and ensure learners have access to high quality research informed learning experiences.

1. The Review Panel should encourage an increase in shared academic-industry learning and teaching appointments, increasing the porosity of employment boundaries.

While many universities have joint/adjunct appointments for their research endeavours, there is less sharing of talent specifically for learning and teaching. This limitation can deny our learners' access to important contemporary, industry relevant education and reduces the university's ability to produce highly employable graduates for the workforce. Equally it reduces the exposure of front-line learning and teaching academics to contemporary industry practice, which can keep them relevant in both their research and teaching practice. The Panel could consider a national scheme to support industry teaching fellows with movement in and out of the academy. National professional development programs could be developed to support the transition into the academy. Similarly, industry should be incentivised to provide placement opportunities for academics seeking to undertake short or longer term sabbaticals/engagements to underpin a refresh of their learning and teaching approaches. This also requires a greater recognition within the higher education sector of the value of learning and teaching focused sabbaticals, either within Australia or globally. It may also challenge long standing assumptions of the most effective professional development opportunities for early career academics who may move freely between sectors as they build their career which may necessitate a reconsideration of appropriate support structures at each stage. Future academics may also move more easily across different parts of the higher education sector, enhancing diversity in the pathways to academia and replicating the more joined up journey of many of our learners. Lastly consideration should be given to what is required to show academic equivalence to satisfy the Higher Education Standards requirement for teaching staff to have a qualification higher than the level they are teaching or equivalent.

2. The Review Panel should recommend stronger alignment of Australian migration policy with the growth needs of the university sector and allow for the global engagement of academic talent.

The global academic workforce is an important contributor to the development and consumption of new knowledge that strengthens research and underpins successful learning and teaching outcomes. Combining the best of Australian and international academics in our universities strengthens our programs for the benefit of Australian and international students. The global academic workforce is an increasingly competitive one with many countries outpacing us on speed to offer and associated visa processing. Australia needs to be in a position where it can attract the strongest academics from across the world. While recognising the importance of checks and balances to align with our national security provisions, reinforcing the global nature of an engaged academic workforce in all relevant policies is an important step to ensuring the future of a strong learning and teaching agenda across our university sector. For example, university lecturers are not currently listed on the skilled occupation list. Australia is also becoming an increasingly expensive country for international academics to consider which may require better incentive systems to be available to attract the best talent. The government has recently announced enhanced post study work rights for international graduates. This could be further extended for international graduates who take up academic positions within our higher education sector with additional consideration given to those completing PhDs.

3. Through the Accord, the Review Panel should promote the essential role of learning and teaching in addressing the future needs of Australia’s workforce and society.

Sector wide professional development programs could be supported to enhance opportunities for academics to learn from their peers. Also, best practice and experience across the sector could be shared and further developed through communities of practice. In addition to enhancing practice, consideration needs to be given to staff wellbeing as an important factor in retaining key staff in the sector. Over recent years, there has been a diminution in the formal recognition of our national learning and teaching achievements with government defunding of the national teaching awards and the dissolution of a national structure to encourage and fund best practice that leads to the development of sector wide resources to support learning and teaching. While we do not need to replicate past structures, it is important that any consideration of the future of the higher education sector recognises the essential role that learning and teaching plays including celebrating the achievements of all parts of our academic workforce and recognising the pride that our workforce has in their work.

4. The review panel should promote the development of key roles, specialised skills and equity within the sector.

It is important to recognise where there is a skills deficit in roles and skills across the sector and invest in developing our future workforce in these areas. For example, considering the important work being undertaken regarding reconciliation, investing in the next generation of Aboriginal and Torres Strait Islander academic leaders is essential for the sector to continue to mature in this respect. To support this, it is important to support the important work being undertaken across the sector regarding Indigenous Workforce Strategies, this work be part of creating the next generation of Indigenous academic leaders. Setting targets for Indigenous academic at all levels would help drive this intention as would recognition of contribution made by Indigenous academics and Indigenous Knowledges to the sector. Lastly the “third space” needs consideration, with the fast pace of technology developments there is a need to consider the role of how we achieve contemporary technical excellence, which could be about investing in upskilling academic staff or the creation of roles that sit between academic and professional staff as “academic practitioners” (that is those who understand pedagogy and have the advanced educational technology skills).

5. The review panel should review the funding cycle for tied funding positions.

Many university positions are tied funded. For those that fall under the student support, the majority receive funding through HEPPP or ISSP which is awarded annually and announced late in the year. To maintain a strong learner support workforce, consideration should be given to longer funding cycles so longer contracts can be issued. This will provide job security for staff in these roles and continuity of practice for the university. With longer funding cycles monitoring and reporting can continue annually.

F. Funding and Governance

The last decade or so has seen successive changes to university funding for learning and teaching, and student eligibility for Commonwealth Supported Places (including the so-called Student Protection Measures introduced as part of the JRG package). These changes have included overall reductions in teaching related funding available to universities and changes to student contributions with the aim of influencing student course of study choice as well as the introduction of additional funding schemes (e.g. Destination Australia, NPILF, Regional Growth Loading). These funding changes are also variously associated with changes in the governance and regulatory environments, increases in administrative and reporting costs to comply with these new schemes, as well as changes in the role and number of various advisory bodies to government on higher education.

Funding

One of the significant changes under the JRG package was how units of study were allocated to funding clusters and student contribution bands according to field of education codes. Changes to these clusters and bands included the relative contributions of public and private funding, particularly in some disciplines, to the cost of obtaining a higher education qualification. These changes have had the overall result of reducing university revenue associated with the provision of higher education to domestic students while disproportionately increasing the student contribution in HASS disciplines and reducing the total contribution in some key high cost teaching areas STEM areas e.g. Engineering. One of the reasons provided for this change was to ensure that education delivery did not subsidise the costs of research. Universities received a one-off payment to assist in bridging the gap, and additional funding made available associated with specific new programs (e.g. Trailblazer). Unfortunately, this rationale did not acknowledge that individual providers are best placed to manage the allocation of revenue to teaching or research in ways that are consistent with their distinct missions.

The Department introduced financial arrangements to support transition to the new cluster funding model associated with the JRG package. These arrangements included 'transition funding', maximum-base grant guarantee and the three-year pilot of the NPILF (without an immediate funding reduction). These arrangements had the effect of slowing the onset of the revenue reduction between 2021 and 2023. However, these major transition measures finish at the end of 2023, which coincides with an overall downturn in higher education participation, particularly for mature aged students which are the majority cohort in non-metropolitan institutions.

Other recent changes included amalgamating the funding for regional, rural and remote students (previously regional loading), attracting and supporting students from low socio-economic backgrounds (previously HEPPP) and Indigenous Students (previously ISSP) into the one Indigenous, Regional and Low Socio-economic Attainment Fund (IRLSAF). HEPPP and ISSP were already required to seek separate departmental approval for funding plans and impact reports and continue to be reported separately. In addition, separate allocations for the management of placements for pre-service education and nursing students, for which universities incur significant charges from placement providers, were incorporated without visibility into the base grant.

The student protection measures for genuine students and eligibility for CSP places have imposed significant additional regulatory burden on all universities – and disproportionately on universities that have widening participation as a key part of their mission. These measures were imposed along with the reductions in overall funding. These measures add to the stress and uncertainty of applying for and starting university for those students who are currently under-represented in higher education. Although the national participation rate in higher education (of people 21-35 years) has

been reached and exceeded the Bradley target of 40%, overall participation rates are not equitable across Australia and regional, rural and remote students, Indigenous students, first in family students and other equity groups continue to participate at lower rates than their non-equity and metropolitan/city based peers. If they continue, the student protection measures will militate against significant efforts to increase participation of Indigenous, equity group, first-in-family students and these students, as well as students from regional, rural and remote areas, will continue to be under-represented in our higher education institutions.

Various governments have claimed that funding has increased. However, these claims are largely due to indexation, and piecemeal short-term funding associated with new CSPs particularly for micro-credentials and short courses, rural and remote Indigenous students and just this week, additional places to equip graduates to work in the nuclear industry.

Funding Issues

- The current approach to funding higher education delivery is unstable, complex and lacks transparency and disadvantages students and the universities that are committed do the heaving lifting to achieve national social justice and equity outcomes.
- Reducing the student contribution in some funding clusters to encourage enrolment in particular disciplines has not impacted positively on student choice and has reduced revenue in these areas of industry and future workforce demands, where universities should be incentivised to enrol students.
- Increasing the student contributions in arts and humanities clusters appears to have contributed to softening demand for studies in these disciplines and will further disadvantage the participation of students from IRLSAF backgrounds. These disciplines are traditionally used by second chance learners as a pathway to professional programs. In particular, the large increase in the student contribution to law, justice and legal studies discourages applications from IRLSAF students and has the potential to stratify these professions based on background privilege or disadvantage.
- The apparent removal of additional revenue associated with nursing and education placements is at odds with government imperatives to build closer relationships with industry and ignores the real costs incurred by universities in managing placements which are a requirement of professional bodies. There is no additional funding for the systematic administration of industry placements outside these disciplines.
- The allocation of courses to funding clusters has reduced the revenue to universities associated with high-cost teaching in professional areas such as engineering.
- The current funding model and fee structure do not recognise the compounding impact of intersectional disadvantage on student participation in higher education. Poverty remains a major barrier to the participation of IRLSAF students, mature age students, and students with disability.
- The current funding model does not provide sufficient recognition of the additional costs of teaching and supporting students from complex backgrounds which are characteristic of cohorts who predominate in regional and outer metropolitan universities.
- The student protection measures introduced under the JRG package, in particular the genuine student requirement and 50% pass rate eligibility for CSP places, are punitive and disproportionately penalise Indigenous, first-in-family students, students with disability, students from low socio-economic backgrounds, and students from regional, rural and remote locations.

Recommendations

1. **That higher education funding is considered within a whole of government approach to recognising the broader benefits of higher education** to e.g. defence, industry, regional development, social welfare, mental health and wellbeing.
2. **That the Accord consider stable, holistic and simpler funding arrangements that comprise a single incentivised performance-based funding allocation model which is discussed and agreed with the Department as part of the institutional compact process.** The new funding arrangement would recognise the full cost of teaching for government contributions and re-establish the relationship between student contribution and potential future earnings. The funding model should provide transparency and clarity that is understood by institutions and the public, lead to improved accountability for student outcomes, incorporate indexation, and have a longer-term time horizon with rolling 6 monthly adjustments.
 - **That the new funding model includes differential funding for institutions.** A differential funding model is crucial in recognising the additional costs incurred in supporting the enrolment, success and completion of non-traditional students including additional allowances for Indigenous pathways education and traditional enabling programs, first in family students, regional, rural and remote students, students with disability and students from low SES backgrounds. Such funding should be directed to initiatives and programmes that lift the overall success rates and should not problematise particular cohorts of student.
 - **That the new funding model considers the current student fee structure and HECS system, including differential thresholds for student fees and repayments,** to ensure disadvantage is not a barrier to participation, equity of outcomes are sustained post-graduation and that participation of Indigenous students and students from equity groups is incentivised.
3. **The 50% pass-rate eligibility requirement for CSP places is removed** and replaced by existing robust institutional progression management practices that are tailored to meet the needs of their specific cohorts.

Governance

Governance of Higher Education is complex. As well as the current Department of Education, some state governments and their education agencies are increasingly involved in higher education with interventions ranging from proposed university amalgamations (WA and SA) and some contributing revenue for infrastructure to collaborations on local projects and initiatives.

Professional accrediting bodies continue to impose specific accreditation requirements that go beyond the learning outcomes and competencies required of a new graduate and the important role of these bodies in upholding the standards of the profession through accrediting courses of study. A [Joint Statement of Principles for Professional Accreditation](#) was agreed between Universities Australia and Professions Australia in early 2016 but unfortunately the intent of this statement has not been realised. For example, professional bodies continue to stipulate specific curriculum matters such as forms of assessment, and some require particular numbers and levels of academic staff appointments as well as impose conditions on the nature of their employment. These interventions constrain curriculum innovation and the introduction of new and innovative learning and teaching and assessment practices, and they influence employment decisions regarding suitably qualified academic staff, all of which are the responsibilities of universities. It is inevitable that various tensions will arise from these arrangements which further increases the reporting burden on

universities. The current complex arrangements make it difficult for industry to find the 'right-door' particularly when multiple relationships might exist with the one industry/institutional partner.

The federal government manages the annual Compact process, which recently has not been consistent across universities, with requirements to report against Compacts disassociated from funding agreements.

The Tertiary Education Quality and Standards Agency is charged with provider registration and regulating the activities of self-accrediting and a diverse range of non-self-accrediting higher education and tertiary providers. In addition, there are panels that advise the Education Minister and Department, including the Higher Education Standards Panel, an Equity in Higher Education Panel, the National Aboriginal and Torres Strait Islander Higher Education Consortium, and a panel that provides advice to the Department on the national Student Surveys. Except for the Higher Education Standards Panel, the advice provided by these various bodies is largely invisible to universities.

The effectiveness of TEQSA in protecting student outcomes and the reputation of the sector is uncontested and its risk and evidence based approach to accreditation against the Standards in the Higher Education Standards Framework provides a useful approach to reduce short-term and unproductive departmental reporting. However, operationally the constant churn of staff, obscure internal structures, the lack of senior staff proactively engaging with senior university stakeholders leading to poorly informed advice, the conduct of its work in a decontextualised way, the short lead time between TEQSA's engagement with Universities and reaccreditation submissions, and the sheer number of institutions falling under its remit make meaningful engagement by universities with TEQSA and vice versa, challenging to say the least. In addition very limited time is available for consultation with the tertiary sector regarding changes to guidelines, notification of which occurs in newsletters, and there is a lack of consultation preceding major changes in policy/direction (e.g. apparent recent changes to the Core Standards).

Governance Issues

- There are tensions between state and federal interests and oversight of universities.
- There has been a lack of genuine consultation by government, and some government decision making has lacked a public policy basis and clear rationale. Ongoing program updates are announced at short-notice and have tended to be one-off or interim arrangements rather than sustainable public policy driven initiatives developed in consultation with the sector and the broad range of expertise on higher education that it holds.
- The move away from peer-driven review to standards based regulator driven review raises concerns that a decontextualised approach to re-registration of low-risk university higher education providers encourages risk aversion, reduces flexibility to respond to new education opportunities and constrains innovation.
- The decontextualised approach to university re-registration combined with the lack of ongoing engagement between senior TEQSA staff and key university stakeholders is not reflective of a mutually beneficial, risks and standards based approach to reaccreditation.
- The work of and advice provided by various policy and advisory bodies is not visible or communicated back to the sector, therefore the effectiveness of these bodies in progressing particular aspects of higher education policy, and whether the advice is heeded by government or not, is not known.

Recommendations

- 1. A clear sustainable public policy platform which sets out the purpose of higher education in Australia and the aspirations for the Australian higher education system is needed.** This public

policy platform should include immediate actions as well as short, medium and long term time horizons and be an outcome of the O’Kane review and resulting Universities Accord. The public policy platform should incentivise Universities to meet new targets – focused on innovation and growth and recognise high cost to learning and teaching for social inclusion priority groups.

2. **That following the completion of the Review, an independent body oversee the work of the Accord.** This body could incorporate the remit of current advisory bodies and would promote genuine collaboration across the sector and with key stakeholders.
3. **That TEQSA continues to strengthen its risk and evidence based reaccreditation process for university higher education providers.** Peer-review would be an integral part of this process, with cycles of review adopting an enhancement theme approach.
4. **That the Department engage with universities through relevant UA DVC groups** to ensure the timely provision of data and information including national survey data, to assist universities conduct evaluation and impact analysis of improved practices.

G. Future Proofing Australian Universities

This paper focuses on how the Accord process can contribute to *future proofing* Australian universities. The COVID-19 pandemic sent shock waves through the sector and dramatically affirmed the importance of institutional resilience. Now is the time for universities to build more state-of-the-art, efficient and accessible educational offerings and drive innovation and growth in the broader academic endeavour. The Accord provides an opportunity for the Government and universities to work together, to break down current barriers and to build the confidence and resilience required for innovation and growth. As such, the following five recommendations are aimed at future proofing Australian universities.

1. **The Accord is considered a *trusted partnership* between the Australian government and Australian universities.**

To support future proofing Australian universities, the Accord should be considered an opportunity for the Government, universities and other key stakeholders to establish a trusted partnership. Universities are low risk institutions that consider the academic endeavour of paramount importance, take great care of their students and provide them with a standard of education that is well above the standard provided internationally. The regulator (TEQSA) upholds the reputation of the sector and protects student interests. The Accord as a trusted partnership will appropriately reflect the exceptional standard of higher education in Australia.

The Accord as a trusted partnership should result in greater standardisation and consistency in the ways that the Government gathers information from universities to inform policy. The Accord should result in the simplification of governance structures and regulation, thus supporting the future resilience and efficiency of the sector and individual institutions. It is important to universities that the Government carefully considers the impact of policy changes, especially frequent policy changes, and focuses on effectiveness and efficiencies in collaborative undertakings with universities.

2. **The Accord is constructed to support enhanced diversity in the Australian university sector and greater clarity in individual university mission and identity.**

The Accord as a trusted partnership should enable individual universities greater opportunity to diversify and more able to articulate a compelling and robust individual mission and identity. This diversification will provide improved opportunities, enhanced incentive and less risk for universities to innovate and invest in the areas of speciality that they have identified through the Accord process. Greater diversity is likely to reduce unhealthy competition between universities, enhance choice for students and support the resilience of individual institutions, thus contributing to future proofing the sector.

3. **The Accord process includes a longer-term funding timeframe and a simplified and flexible model for funding universities.**

The Accord process should support future proofing of Australian universities by including a simplified and flexible funding model with a longer-term funding period that will enable universities to become more diversified and distinctive. A longer-term funding period, of five years for example, and flexibility would give universities greater certainty to be more innovative as they were during the COVID-19 pandemic.

A longer-term and flexible funding period will require the Government to hold universities accountable with the Accord process clarifying goals and expectations, including milestones and performance indicators. Simplicity should be enhanced with the removal of the current piecemeal approach and reporting against multiple funding initiatives such as the previously announced performance-based funding, NPILF and the annual process for equity-based funding.

An important aspect of a simplified and flexible funding model will include teasing apart funding for teaching and funding for research. The current JRG approach to the Commonwealth and

student contributions is inequitable and does not achieve the intended enrolment patterns. To future proof the pipeline of graduates needed in the workforce, this system must be changed to better incentivise enrolments in areas of need and provide a more equitable structure for student contributions.

4. The Accord moves universities away from the binary of ‘online and in-person education’ towards a future facing perspective for educational environments.

Future proofing Australian universities will require the sector to be resilient to the economic, geopolitical and social disruptions caused by technological changes, natural disasters, climate change and other factors. During the COVID-19 pandemic, universities in Australia rapidly adapted to the new conditions. While the new and expanded digital approaches were accepted in an emergency, future proofing means that universities need to move to a more holistic and future facing perspective for educational environments.

The reality of contemporary student lives means that universities need to be able to design and deliver high quality educational programs with a complementary blend of both in-person and online information and activities. While some educational programs may be designed to be more online and others more in-person, the binary of one or the other is rapidly becoming meaningless and should be abandoned. Continuous improvement will be required to enable staff and students to adapt to developments in the relevant discipline, in pedagogical research and in workplaces.

Moving to a future facing perspective with a complementary blend of high quality in-person and online experiences will contribute to university resilience to future shocks as well as meeting the demands of the future workforce, including by investing in new technologies, research and training programs.

5. The Accord should promote personalised, place based and contextualised learning relevant to the individual university mission and identity.

Traditional university education models in Australian universities are perceived to be under threat due to the advancement of artificial intelligence and machine learning technologies. These technologies are capable of providing sophisticated responses to traditional examination questions and essay-based assignments. There is a risk that in order to address immediate concerns of academic integrity, some academics may revert to traditional assessments such as in-person tests and examinations. Educational research, however, indicates the disadvantages of traditional assessments that tend to promote surface memorisation rather than deep learning and favour certain types of students with the social capital and heritage to succeed in traditional learning environments.

The Accord presents an opportunity to enhance university resilience by promoting personalised, place-based and contextualised learning relevant to the individual university mission and identity. The goal for future proofing universities should be the use of artificial intelligence and machine learning technologies as a contribution to students’ understanding of both the challenges and opportunities these present in ethical, economic, and technological contexts. In terms of assessment, they should be utilised in authentic learning environments directed at the assessment of human skills that are not easily replicated by technology. It is becoming understood that artificial and machine learning technologies are less effective at enabling students to cheat in contextualised learning environments such as WiL, field work, oral assessments, observed tasks, debate, excursions, laboratory and studio-based learning and learning centred around group-based assessments and assignments applied to local contexts and problems.