

11 April 2023

Australian Universities Accord Panel  
By online submission

Dear Sir/Madam,

**Re: Veterinary Schools of Australia and New Zealand submission**

**Introduction**

Veterinary Schools of Australia and New Zealand (VSANZ) is pleased to provide a submission to the Australian Universities Accord Panel in response to its discussion paper. We made a submission to the first round of consultation on 19 December 2022.

VSANZ comprises the eight veterinary schools of Australia and New Zealand. These schools are located within James Cook University, the University of Queensland, the University of Sydney, Charles Sturt University, the University of Melbourne, the University of Adelaide, Murdoch University and Massey University (New Zealand).

In our December submission, we highlighted the issue of underfunding of veterinary education in Australia. We also alerted the Panel to the commissioning of an independent expert panel to undertake a review of the veterinary science education capability of Australia and New Zealand ('Review') in mid-2022. The Review was chaired by Dr Helen Scott-Orr AM PSM, former Chief Veterinary Officer of NSW and Commonwealth Inspector-General of Biosecurity. The report from the Review has been delivered and forms the basis for this submission. Indeed, the report is provided as an attachment to this covering letter. (We apologise that the report has not yet been professionally proofread or desktop published.)

In our opinion, the Review delivers a comprehensive analysis of the state of veterinary education in Australia and New Zealand, and relevant aspects of the profession itself. It offers a series of recommendations that we will consider and seek to implement over the medium term. Some of these recommendations apply directly to the schools, their host universities, and government, while others are directed towards accreditation and professional bodies.

VSANZ does not claim in this submission to make broad observations about, or suggest systemic changes to, the Australian higher education sector. Our concern is with the sustainability of veterinary education and, by implication, the veterinary profession itself. We do however believe that the Review offers some innovative ideas that will have application to other university degrees that may share some of the challenges facing veterinary science.

We have not attempted to provide a response to each of the 49 questions posed in the Australian Universities Accord Discussion Paper. We have focused on the questions of greatest relevance to veterinary education.

### **Responses to selected questions**

1. How should an Accord be structured and focused to meet the challenges facing Australia's higher education system? What is needed to overcome limitations in the current approach to Australian higher education?

We encourage the Panel to consider the importance of including all relevant participants in the structuring of an Accord. In the case of veterinary education, in addition to universities, relevant parties include the Australian Veterinary Association (AVA), the peak body for the profession, and the Australasian Veterinary Boards Council (AVBC). The AVBC acts on behalf of the veterinary boards of the states and territories to accredit veterinary schools to deliver graduates suitable for registration as veterinary surgeons by the boards.

An important issue for veterinary education is the nexus between the accreditation standards of the AVBC and those imposed upon the university overall by the Tertiary Education Quality and Standards Agency (TEQSA) and other agencies and frameworks. This is discussed in section 2.1 of the Review. As the Review notes, the AVBC standards are considered 'necessary to meet government and societal expectations and protect the public'. They are also onerous and expensive to achieve – for example, the requirement for a staff : student ratio of 1 : 7.5.

The Review also discusses the intended transition of the standards from inputs to outputs, and from processes to outcomes, an approach that would allow a greater degree of innovation among schools in their teaching delivery. This is a transition that VSANZ strongly supports; noting, at the same time, the challenge of identifying appropriate outcome metrics.

The Review recommends that:

*AVBC and VSAAC<sup>1</sup> (along with international regulatory partners where appropriate) work with veterinary schools to:*

- *Review the accreditation process to remove requirements that duplicate the many other accountability and quality assurance processes of Australasian universities.*
- *Review the necessity and cost-effectiveness of each accreditation requirement in the light of the desired learning outcomes, and*
- *Accelerate the transition from assessing teaching inputs to assessing learning outcomes as the principal basis for accreditation of veterinary programs [Recommendation 1].*

4. Looking from now to 2030 and 2040, what major national challenges and opportunities should Australian higher education be focused on meeting?

Section 1 of the Review explores the 'changing needs for veterinarians in Australasia'. We will not repeat all of the Review's observations here, except to summarise the key points:

- There is a critical shortage of veterinarians in Australia and New Zealand (and in fact globally). There is debate as to whether this is a problem of supply or retention or both. Certainly, issues such as poor mental health and poor remuneration are prominent. Veterinary schools have

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<sup>1</sup> Veterinary Schools Accreditation Advisory Committee (of the AVBC)

student demand well in excess of the number of places available, but there is a real risk that one or more universities may close their veterinary schools for financial reasons. The supply of veterinarians to the Australian workforce would then become highly constrained.

- Reliable animal health and welfare quality assurance systems and veterinary certification underpin key aspects of our public health and valuable trade in agricultural products, enhancing our international reputation with enormous economic and social benefits.
- Biosecurity threats are constantly increasing as the flow of people and goods worldwide grows and climate change intensifies. Australia is currently concerned about foot-and-mouth disease of ruminants, lumpy skin disease of cattle and African swine fever, present in our northern neighbours, as well as many other disease threats such as highly pathogenic avian influenza.
- Pets are increasingly filling social needs and contributing to wellbeing in an increasingly urbanised society – a trend that was hugely magnified during pandemic lockdowns and is likely to continue. Demand for more and increasingly sophisticated veterinary services to companion animals has grown.
- The global challenge of food security requires vets to work with existing farming sectors as well as emerging ones including aquaculture.
- Veterinarians are vital in the effort to conserve endangered species and to respond to devastating impacts on wildlife, as well as livestock and pets, of fires, floods and heat stress, which are increasing with climate change.
- One Health (and related concepts of Eco Health and Planetary Health) recognise the interconnectedness of human, animal and environmental health and wellbeing. These concepts incorporate many of the points above, are growing in importance and rely critically on veterinary contributions.

These challenges affect the entire economy and society as a whole. There is a strong degree of public interest in Australia having an effective veterinary education sector.

5. How do the current structures of institutions, regulation and funding in higher education help or hinder Australia's ability to meet these challenges? What needs to change?
35. Where providers make a distinctive contribution to national objectives through community, location-based or specialised economic development, how should this contribution be identified and invested in?
46. How can infrastructure development for higher education be financed, especially in regional and outer urban locations?
47. What structure of Commonwealth funding is needed for the higher education sector for the system to be sustainable over the next two decades?

Australian veterinary science students are in the highest Commonwealth Grant Scheme (CGS) funding cluster, together with agriculture, medicine, dentistry, and pathology. Veterinary student fees are also in the second highest band. The combined total of CGS and domestic student funding is the same for veterinary science, medicine, and dentistry students. Despite this, for most if not all veterinary schools, there is a substantial gap between funding and costs. Section 5.2 of the Review notes that in 2018 the average cost to deliver the veterinary undergraduate course, per Equivalent Full Time Student Load

(EFTSL), was 148% of the funding received by the university from government and student fees for each domestic student. In 2019-20 the ratio had dropped to 135%, a fall that ‘was most likely due to the COVID-19 pandemic related under-expenditure and which is likely to be a temporary phenomenon’. Universities cross-subsidise their veterinary schools from the surpluses generated by other courses.

Major contributors to the relatively high cost of veterinary education include the requirement for clinical training of undergraduates to handle both large and small domestic animals and the absence of any public hospital system (as exists for medicine) to help deliver this training. As the review notes, ‘unlike medical doctors, veterinarians must be able, on day one after graduation, to not only handle and treat a range of species, but also to act as their surgeons, imagers, dentists and more’.

Universities and veterinary schools have implemented numerous measures to reduce the funding gap while continuing to meet the AVBC standards. These measures have included the merging of veterinary schools into larger faculties, sharing of resources between schools, enrolling more students (including international students), and offering related degrees such as those for veterinary technicians. There are, however, major limits to how student numbers can be increased without commensurate course delivery cost increases.

The Review makes a number of related recommendations, notably:

*Each veterinary school consider the ‘fit’ of structural reform opportunities identified in this report with their own particular strategic context and operating environment [Recommendation 13].*

*All eight universities with veterinary schools jointly contribute to a shared strategic-change fund to unlock effective veterinary school resource-sharing models [Recommendation 14].*

*The Australian Government move quickly to increase the funding rate per veterinary EFTSL by at least 30% – and, where relevant, lift the maximum basic grant funding of universities to accommodate this increase in revenue. The NZ Government should similarly urgently adjust its grant funding for veterinary EFTS by at least 10% per annum over three consecutive years [Recommendation 15].*

*Governments consider providing clinical training loadings for a designated number of veterinary students’ clinical training in priority areas [Recommendation 16].*

*Governments and industry increase the amount of full-cost funding in the research priorities of the animal and public health sectors and encourage co-location of veterinary schools and government research institutions while actively incentivising collaboration [Recommendation 24].*

*Australasian veterinary schools and their R&D partners collaborate to develop a complementary set of postgraduate education and research programs to address key national, regional, and global needs [Recommendation 25].*

The veterinary schools understand that there are many competing demands on the public purse. They also understand that they must strive to continually innovate and deliver their courses more effectively and efficiently. However, as the Review notes: ‘There was a strong consensus amongst the heads of school that things cannot continue as they are and that the opportunities for incremental change are now largely exhausted. Put simply, the schools are at a tipping point’. As noted in the response to Q4,

there is a real risk that one or more universities will close their veterinary schools because they cannot afford to keep them going, if funding issues are not addressed.

This conclusion highlights a critical weakness of the Australian university system that has been magnified under current pressures: it is not structurally designed to work as a collective for the common good of Australia. Universities have been incentivised to act as competing entities for revenue-earning activities while there has been little incentive to share expenditure on capital development, capacity and capability. This discussion can be extended to the balance between teaching and research in university education particularly when the historical balance between expenditure and revenue sources has been disrupted. There is a strong argument for quality research to underpin and support quality teaching in university education while also acknowledging that day one competencies in a professional degree like veterinary science are dominated by skills-based training. Veterinary science has enjoyed the reputation of being a prestige course and therefore attractive to universities to host. This may not be enough to ensure that all of the current veterinary education capacity is retained as universities take tough decisions to manage their finances.

An Accord could play a valuable role in ensuring universities are appropriately incentivised to continue to train high quality veterinarians for Australian society and the economy.

#### 14. How should placement arrangements and work-integrated learning in higher education change in the decades ahead?

As noted in the response to Q5, veterinary education requires a clinical training mechanism and has no public hospital network on which to draw. Schools either provide and staff their own clinical teaching hospitals or, in some cases, they outsource the teaching hospital to one or more third-party providers, sometimes using the university's own facilities (a 'distributed' model).

Schools also rely on farm businesses to accept students learning animal husbandry, and on private veterinary practices to provide clinical experience. These extramural studies are required under the AVBC standards. The reliance of schools on extramural partners has grown and become increasingly challenging for schools to manage as student cohorts have grown in size and as expectations for managing, supporting, and documenting student learning experiences have also grown.

Both farmers and veterinary practice owners make enormous and largely unpaid contributions to the training of veterinarians. Students, too, incur significant costs, as they must meet their own travel and accommodation costs, as well as forgoing the opportunity to earn income from part-time employment while they are travelling for extramural placement training.

The Review (section 7.3) notes the recommendations of the recent Senate Rural and Regional Affairs and Transport Committee's review of the adequacy of Australia's biosecurity measures and response preparedness, and its finding that 'the rural veterinary profession appears to be in crisis'. The Review identified the opportunity to both strengthen the network of rural veterinary practitioners and augment the rural teaching capacity and relevance of university-based veterinary teaching hospitals. It recommends that:

*Governments consider contracting a network of rural veterinary practices to provide teaching and government services in the regions – including the teaching of livestock clinical practice and government veterinary services [Recommendation 21].*

The Review argues that ‘government-supported rural veterinary teaching practices could play the same role in veterinary education as the public hospital system plays in medical training and would utilise similar processes of responsibility and accountability with regard placement, supervision, support, and assessment’. An analogous model exists in New Zealand (the Ministry of Primary Industries’ Veterinary Network for Biosecurity Preparedness and Response or ‘VetNet Biosecurity+’). Australia also has the Rural Health Multidisciplinary Training Program which successfully supports medical, dental and health care in rural Australia.

Interestingly, the Review also discusses (section 4.5) the concept of a veterinary ‘apprenticeship’ in which students undertake supervised employment in a practice setting while they are completing university training. ‘Medical Doctor Degree Apprenticeships’ are soon to be offered in the UK.

An apprenticeship model offers the opportunity to broaden the diversity of students entering professional courses, providing those who are unable to commit to fulltime study with a path to professional qualification. The model also gives employers an alternative path to growing their workforce. It is only likely to suit larger employers with the necessary depth of supervisory capacity and breadth of case load, but employers of this nature are growing in prominence in the veterinary industry. It may also be an opportunity to provide partnered training opportunities for in highly focused areas such as aquaculture.

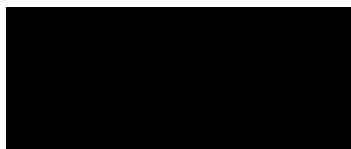
The review recommends that:

*Veterinary professional associations, AVBC, and schools explore veterinary apprenticeship models which might be relevant to Australasia and the cost-sharing options which might facilitate them [Recommendation 10].*

## **Conclusion**

We thank you for this opportunity to make a submission to the Accord Panel. We provide the full Review report for additional detail. We would be pleased to provide further information, in a face-to-face discussion forum if the opportunity were to arise.

Yours sincerely



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Chair, VSANZ

Enc: Rethinking Veterinary Education report