The Secretariat
Review of Australia's Higher Education Sector
Canberra

21st August, 2023

Submission in response to the Interim Report of the Australian Universities Accord

Executive Summary

The Accord Interim Report is supported in general, however is lacking in details relating to measurement of outcomes. Failure to consider and address several areas of detail, will have negative consequences in realising and measuring the future success or failure of recommendations.

1. Equity, as discussed in the Interim report, remains mainly anchored in the factors developed in the 1990's and not revised and updated to represent the quantitatively apparent other under-represented cohorts within Australian society with respect to bachelor degree participation and attainment. Continuance of the current exclusive focus on existing recognised Equity cohorts, perversely structurally solidifies the under-representation of the other cohorts through inattention.

It is recommended that -

- Equity is redefined to be all under-represented cohorts based on the most recent Census using tertiary education Participation/Attainment Rates derived from the Census. Where the cohort is below the target by X percent (set by government), then is it regarded as a recognised Equity group for the purposes of the Accord.
- An extended range of Equity variables are collected and reported from applicants and students under the Tertiary Collection of Student Information (TCSI) which are aligned to the new under-represented cohorts.
- 2. The rubric of **taxonomies** supporting the analysis and performance management of the tertiary sector needs updating. Without updating, the currency of data being collecting is at best limiting analysis and at worst preventing analysis.

It is recommended that -

- The Australian Standard Classification of Education Disciplines (ASCED) be revised and updated for all Courses of Study and Units of Study and continues to be reported via TSCI to government.
- All coursework Courses of Study and their specialisation are related to occupations under the Australian New Zealand Standard Classification of Education (ANZSCO) are reported via TCSI to government for the first time.
- The Australian Higher Education Staff Collection is re-developed to meet the needs of the sector and support the Accord's recommendations.
- 3. Relevant Student data collection for the government should be consistent in regards to student demographics.

TCSI should record additional items currently collected in the VET sector -

- Employment status of the student (collected from the student)
- Study reason

and a new mandatory item for collection should be added - Course Discontinue Reason.

Introduction

Further to the opportunity for submissions to the interim report, I provide the following with the primary intent to enable the effective operationalisation and realisation of key proposals, together with supporting the "feedback loop", to ensure that the final recommendations implemented under the Accord, are in fact measurable.

As background, I have been employed within the Higher Education sector in Australia for over 20 years and have held responsibilities relating to all previous "reforms" since 2001 including institutional compliance, reporting and subsequent institutional performance management/reviews related to the reforms. By way of general observation, many elements of the former reviews have not been fully achieved through failure to consider how to effectively implement and measure outcomes.

Indeed, Peter Drucker's often quoted "you can't manage what you can't measure" and that mismeasurement can lead to mismanagement, remain pertinent issues in Higher Education as are for other industries. Without the underlying collection of relevant data, the intent of the Accord's final recommendation, will be unlikely to be achieved and not fully measurable.

Please note that this submission is made in a personal and private capacity.

Equity

Rightfully, the importance of Equity is foremost in the Interim Report recommendations. Notwithstanding, this is already formally and legal recognised in the objectives of the Higher Education Act -

- 2.1 The objects of this Act are:
 - (a) to support a higher education system that:
 - (i) is characterised by quality, diversity, and equity of access; and
 - (ii) contributes to the development of cultural and intellectual life in Australia; and
 - (iii) is appropriate to meet Australia's social and economic needs for a highly educated and skilled population; and
 - (iv) promotes and protects free intellectual inquiry in learning, teaching and research; and

It is noteworthy that the definition of "Equity" has not been defined in the Act enabling it to be adaptable to the changing milieu and characteristics of our Australian Society overtime.

Yet, our current and accepted measures of Equity are founded on "A Fair Chance for All" and the follow-up in Martin's works in the early 1990's which include cementing the following as the sectors measures of Equity –

¹ "A Fair Chance for All: national and institutional planning for equity in higher education, a discussion paper" Australian Government Publishing Service, Canberra 1990

² Martin, L. M. (1994)." Equity and general performance indicators in higher education." Canberra: Australian Government Publishing Service

- Low socio-economic groups
- Aboriginal and Torres Strait Islander people
- Women
- People from Non-English Speaking Backgrounds
- People with Disabilities

The only subsequent additional Equity characteristics of students are the creation of "First in Family" (FIF) around 2010, refining Low SES using lower geographic standards together with emphasis on Regionality and Remoteness. Independently, the Index of Community Socio-Educational Advantage (ICSEA) of a student's school has been developed.

The question that should be asked -

In 2023 Australia, are these Equity variables the only ones relevant or should additional ones be recognised?

At the time of conceptualisation in the late 1980's, issues of availability and accessibility of data were paramount, together with related technologies. Much has changed in over 30 years. Pluralism and diversity in Australia have advanced considerable setting Australia apart from many countries.

Significant advancements have been made in the implications of intersectionality of Equity characteristics. For example, a First Nations student (ATSI) who is FIF, disabled and located Regionally/Remotely is at a greater disadvantage relative to a First Nations student residing in a major city who is not FIF.

The current Equity characteristics are agnostic to whether the applicant or student is mature age or not and their work life history. For example, does age group or employment history, represent an Equity group and how important is this is? As Australia's workforce transitions over time, the concentrated focus on school leavers will be at the disadvantage of non-school leavers.

How important is the income status of the student or their family/household? Only a few Higher Education Providers (HEPs) gather information on whether an applicant/student is Centrelink supported through voluntary collection from applicants/students. This information is available within government, through authorised information sharing, but HEPs are not entitled to it under current Commonwealth law.

Australia's Equity characteristics should also be compared to international standards with the UK's related student data collection being a potential model of additional characteristics to be collected some of which, while sensitive, are voluntary such as religion, sexual orientation, ethnicity, dependents amongst others³. Each has related research on the characteristics' value and use in supporting applicants/students.

The collection of additional data from applicants and students will assist HEP's finessing their admission practices and support.

³ https://www.hesa.ac.uk/collection/student/datafutures/a/student accessed 29th July, 2023

To identify under-representation, the ABS' Census of Population can be used to develop an extended range of reference demographics and population characteristics and associated Participation and Attainment Rates. HEPs through updates to TCSI, will be able to report the extended applicant and student characteristics to government for sectoral analysis and benchmarking.

Where a census cohort is identified below the sector target Participation and Attainment Rates, set by government or the HEP, and the negative differential is greater than then a set percentage, then this cohort is recognised as an Equity Group.

For example, using the Census, single parents are identified as having Participation and Attainment Rates below the target and below the set percentage. Therefore, this cohort becomes a recognised Equity Group until it reaches parity.

This approach introduce dynamism into Equity groups recognition but requires TCSI to collect additional data from students.

In summary, Equity characteristic in Australia' Higher Education, as used currently, are overly simplified. Currently, Equity is viewed in "2D" and not "3D".

Recommendations

To advance the Accord priorities of addressing and promoting Equity, in all its perspectives and dimensions, it is **recommended** that –

- Equity is redefined to be all under-represented cohorts based on the most recent Census using tertiary education Participation and Attainment Rates derived from the Census.
- Where the cohort is below the target by X percent (set by government), then is it regarded as a recognised Equity group for the purposes of the Accord
- An extended range of Equity variables are collected from applicants and students and are reported under TCSI.

Taxonomies and Data Collections

Supporting the analysis of tertiary education are a range of taxonomies. For the sector to be capable of monitoring its performance and for benchmarking, these need to be current and up to date as well as being interrelated between relevant taxonomies. This will assist and enable monitoring and performance management of the sector against the Accord's interim and final recommendations.

Australian Standard Classification of Education Disciplines (ASCED)

First implement in 2001, ASCED has not been updated. It is maintained by the ABS.

The purpose of ASCED is to provide a consistent and comprehensive framework for organising and analysing education-related data. ASCED enables the comparison and integration of data from different HEPs as well as supporting the development and monitoring of education policies and programs.

ASCED interrelates to the International Standard Classification of Education (ISCED) maintained by UNESCO, which was last reviewed in 2011.

As a three-level classification – Broad, Narrow and Detail – and with no review in Australia in over 23 years, HEPs are classifying Courses and Units into "not elsewhere classified" and "not further defined" due to lack of available disciplines.

Examples of the current issues with not having a review and potential forth level or review at other levels include –

- "Clinical Psychology" is not identifiable a discipline under ASCED per se.
- Specialised areas of electrical engineering such as "Nuclear Engineering" or "Renewable /Solar Power Engineering" are not identifiable.
- Specialised fields in IT are not identifiable.

Consequently, quantitatively is it not possible to fully track courses meeting the needs of industry and society, especially where these are emerging or new.

Australian New Zealand Standard Classification of Occupations (ANZSCO)

First implemented in 2006, ANZSCO has been updated regularly and is currently being updated. It is maintained by the ABS.

ANZSCO is a framework for collecting, analysing, and disseminating occupation data for Australia and is a foundation to understanding and developing Australia's workforce.

Currently, HEPs do not report to government the ANZSCO of their Courses nor provide potential applicants detail of the occupation that the course leads to *using ANZSCO standards*, preferring instead to use keywords and specifying, in the case of accredited courses such as Teaching, Nursing and other health courses, the relevant professions.

Job Skills Australia (formerly the National Skills Commission) and other bodies seeking to forecast the supply side, must undertake other approaches to interrelate a Course of Study to the relevant ANZSCO.

HEP's through reporting the occupational outcomes of undertaking courses, using ANZSCO, will support an applicant's understanding as well as supporting external analysis. In addition, it assists the analysis of QILT-GOS results.

Higher Education Staff Collection

The Higher Education Staff Collection has remained unchanged since the introduction of the Higher Education Support Act in 2004 and is reported via TCSI.

Previously, government has identified issues with the collection's scope and this has led to two reviews since 2004. The primary users of the collections data include TESQA for monitoring the sector, HEPs in benchmarking and government for policy review and development.

Currently the collection for Full-Time and Fractional Full-Time staff is based on a snapshot of the 31st March each year with a range of uses including Student to Staff Ratios and costing analysis. Basic demographics are collected for FT and FFT staff. In the case of casual staff, a full year estimate and actuals is collected by the Department, but limited demographics.

Amongst issues identified with the current staff data collected include -

- 31st March, being a snapshot date, is not indicative anymore of the staff employed over the full duration of a year.
- A different level of detailed demographic data is collected between students and staff and issues in understanding the "representativeness" of academic staff and "affinity" to students being taught.
- Only staff receiving renumeration are included and not staff employed by partners and others.
- No information is reported on the academic specialisations (Field of Research) held by academics.
- No information is reported to enable discovering if academics are teaching outside their specialisations.
- While a large proportion of academics are classified as having a work function of "Teaching and Research", the proportionality, whether 1%/99% or vice versa, is not being reported
- The emerging academic role of "Practitioner Scholar" is not identifiable within the collection
- The citizenship of academic staff is not collected, only country of birth.
- The collection and reporting of the coding level of "Organisational Codes" needs improvement. These codes allow cross HEP organisational structure comparison. For example, staff say involved in HEP governances are bundled into "Administration and Overhead services" or "Other general Higher Education providers services".
- No staff identifiers to follow academic staff mobility and concurrency at and between HEPs and anytime.
- With salaries being reported, only non-academic is reported and not academic salaries.

The Interim Report does recognise the benefit of increasing the representation of First Nations staff which is collected under Staff Collection, but many other equity characteristics are missing for staff. As discussed previously, Equity characteristics should be broadened and similar information on the student's equity profile *should be mirrored* with that collected from staff. Again, like with students, sensitive characteristics being collected should be voluntary.

To illustrate, the Staff Collection does not provide information on the location of academic staff eg home postcode. Is this relevant? I would argue that is, as the relative location to the student's campus and Mode of Attendance is important. The Accord's recommendation on regional locations (RUCs , new Unis) would have "blind spots" from a data analysis perspective if not collected and say all the staff teaching turned out to be FIFO.

The report also raises the issue that "academic staff should be chartered and/or active in the profession they are teaching." This again is a variable that should be collected, namely concurrent or last working in industry date.

The Staff Collection should be updated.

TCSI and AVETMIS Student Data Collection

Applicant and student data collections support analysis and currently there is strong alignment between the VET collection (AVETMIS) and Higher Education (TCSI). In the case of VET and where the student is supported by a VET Student Loan, there is also information collected under TCSI.

⁴ A practitioner scholar is an academic who applies academic knowledge and research skills to solve real-world problems in their fields of expertise and practice

⁵ At page 57

Notwithstanding, between the VET and TCSI collection some valuable items are not collected by the latter:

Current Employment **Employment**

14. Of the following categories, which BEST describes your current employment status? (Tick ONE box only)

For casual, seasonal, contract and shift work, use the current number of hours worked per week to determine whether full time (35 hours or more per week) or part-time employed (less than 35 hours per week).

Full-time employee	01
Part-time employee	1 02
Self employed – not employing others	■ 03
Self employed – employing others	1 04
Employed – unpaid worker in a family business	05
Unemployed – seeking full-time work	□ 06
Unemployed – seeking part-time work	0 7
Not employed - not seeking employment	□ 08

Labour force status identifier

Study Reason

Study reason

15. Of the following categories, select the one which BEST describes the main reason you are undertaking this course/traineeship/apprenticeship (Tick ONE box only)

To get a job	01
To develop my existing business	02
To start my own business	0 3
To try for a different career	04
To get a better job or promotion	0 5
It was a requirement of my job	□ 06
I wanted extra skills for my job	07
To get into another course of study	■ 08
For personal interest or self-development	1 2
To get skills for community/voluntary work	1 3
Other reasons	1 1

Study reason identifier

Between all collections, none require a reason from the student on why they have withdrawn from a Course of Study. To provide a mandatory item to collect this reason will add significantly to understanding of student behaviours. To date, it has been assumed that a student's withdrawal is a negative outcome, but this is from the perspective of government, who is seeking the student to become a graduate, and from the HEP who wishes to conform the government's measure of success. However, from the student's perspective, success may be different and could include using higher education as an intermediary while awaiting a job offer.

Recommendations

For the sector to be capable of monitoring its performance and benchmarking under the Accord in some areas, updates to underlying taxonomies are recommended -.

- The Australian Standard Classification of Education Disciplines (ASCED) be revised and updated for all Courses of Study and Units of Study and reported to government
- All coursework Courses of Study and their specialisation are related to occupations under the Australian New Zealand Standard Classification of Education (ANZSCO) and reported to government using TCSI
- The Australian Higher Education Staff Collection be re-developed to meet the needs of the sector, support the Accord's recommendations and be reported under TCSI

TCSI should record an additional items currently collected in the VET sector -

- Employment status of the student
- Study reason

and a new mandatory item for collection Course Discontinue Reason