National Regional, Rural and Remote Education Strategy

Submission form

Welcome to the submission process for the National Regional, Rural and Remote Education Strategy (the Strategy).

The Regional Education Expert Advisory Group invites all interested parties to put forward ideas on the framing paper released on 20 December 2018.

The Advisory Group is seeking action-orientated responses to the challenges and key questions identified in this paper. The paper outlines the background of the strategy formation, the problem facing regional, rural and remote education and the challenges faced by those communities.

Your responses to the Framing Paper should focus on practical steps the Government could take to improve tertiary education access and attainment for people from regional, rural and remote backgrounds.

The form can be submitted any time before public submissions close at **5:00pm (AEDT)** on **1 February 2019**.

Please note that the fields in the form are text only and pictures cannot be included. To return your completed form or if you experience difficulties in completing the form, please contact the Strategy Secretariat at RegionalStrategy@education.gov.au.

Note:

- information provided through the submission process may be published with your permission, including in the documentation relating to the Strategy and on the department's website
- questions marked with a * require an answer to be provided.

Opportunity through learning

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[Attachment A](#) to this document*

Yes ☒

Note: If you do not accept the Privacy Notice and Conditions of Submissions please do not complete or submit this form.

I agree to have my submission published.*

Yes ☒

No ☐

Your details

Title*	Dr
First name*	Sally
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State/Territory*	Victoria

Would you like to receive updates about the Strategy's process? *

Yes ☒

No ☐

Submission details

I am making this submission as a: *

Educator	☐
parent/carer/guardian	☐
Student / potential student	☐
School	☐
University	☐
Training Provider	☐
Employer	☐
community organisation	☐
government agency	☐
peak body / Think Tank	☒
academic person	☐
Other	☐

Are you submitting on behalf of an organisation (including a business, other body or agency)? *

Yes ☒

No ☐

Please specify the organisation on whose behalf you are submitting

Independent Higher Education Australia (IHEA) (Independent Higher Education Australia is currently a registered trading name owned by COPHE)

I confirm that I have the organisation's agreement to make this submission. *

Yes ☒

No ☐

Note: If you do not have the organisation's agreement, please go to the previous question and select "No" to confirm you are not submitting on behalf of an organisation.

Key Questions from the Framing Paper

The Regional Education Expert Advisory Group is seeking responses to the following key questions. Specifically, we are looking for practical steps to overcome the five challenges facing students from RRR backgrounds.

Challenge A: There are fewer study options available in RRR areas

1. What opportunities exist to expand options for further study in RRR areas?
2. What potential is there for universities, vocational training providers and other service providers to better work together in RRR areas, including opportunities to expand service offerings and better support articulation between VET and higher education?

Challenge B: Relocating RRR students face significant financial, emotional and social challenges

3. What financial supports work best for students from RRR backgrounds, including those who choose to relocate?
4. What forms of support might be useful in helping students from RRR backgrounds to continue with their tertiary study?
5. How can universities assist RRR students to feel like they belong on their campus?

Challenge C: Raising aspirations for tertiary education

6. What actions would help to raise aspirations and support informed career choices for students from RRR backgrounds?

Challenge D: RRR often experience multiple forms of disadvantage

7. What practical steps can be taken to support RRR students who experience multiple forms of disadvantage?
8. How can we better support Indigenous people from RRR areas to access and succeed in tertiary education?

Challenge E: Attracting people and jobs to RRR areas

9. How can tertiary education providers further stimulate economic growth in RRR areas?
10. What actions would further strengthen and increase the attractiveness of regional universities?
11. What policies would attract more metropolitan and international students to study at RRR areas, including regional universities and campuses?

Challenge F: Implementing and monitoring a national strategy

12. Would there be value in establishing a National Regional Education Commissioner to oversee the Strategy and, if so, what should their role be?
13. How should success be measured? What goals and targets, including for tertiary education attainment, should be considered both at a national and individual community level?

Please use the space provided below to respond to the questions above

The table cell will expand to accommodate your response. Please limit your response to 3000 words.

Response to the National Regional, Rural and Remote Education Strategy

By Independent Higher Education Australia

(Independent Higher Education Australia is currently a registered trading name owned by COPHE)

Independent Higher Education Australia (IHEA) represents more than 50% of Australia's registered and accredited independent higher education providers (including independent universities) with 61 TEQSA registered independent HEPs across Australia in the membership portfolio. IHEA members educate students in a range of disciplines including Business, Tourism and Hospitality, Education, the Arts, Information Technology, Design, Theology, Physical Education, the Social Sciences, Law, Engineering and Accounting. IHEA members are higher education institutions with both for-profit and not-for-profit models and educate domestic and international students in undergraduate and postgraduate programs.

IHEA holds a unique position within the higher education sector as a representative peak body of higher education providers only. Whilst some members are dual sector, only the registered higher education entity affiliates through IHEA membership.

Membership of IHEA is only open to providers that are registered with the Australian regulator – Tertiary Education Quality Standards Authority (TEQSA). Membership is also conditional on continued compliance with IHEA's Code of Good Practice.

IHEA's primary goal is promoting equity, choice and diversity for all Australian higher education students.

IHEA represents members with a diverse range of delivery models, student cohorts and campus locations. Although no members have campuses in regional locations according to the definition used for this strategy development, there are campuses located outside of the major metropolitan areas of Australia's capital cities. Many of our members, even those located in metropolitan areas, also enrol regional, rural and remote students and they comprise more than 85% of the student body of some member providers.

IHEA welcomes the opportunity to provide feedback into the development of the government's Regional, Rural and Remote (RRR) Education Strategy and to provide some suggestions about how to address some of the key challenges of promoting higher education in regional areas.

Challenge A: There are fewer study options available in RRR areas

IHEA believes there are a number of ways Challenge A could be addressed.

Much could be done to increase the opportunity for RRR students to have access to the greatest number of higher education study options through making independent providers a more viable choice. The independent higher education sector can provide significant opportunities for increased participation by providing a more diverse educational experience for tertiary students than the traditional university experience. A present, government policies make studying at some independent providers more expensive than studying at a university.

Students at independent providers who are eligible for FEE-HELP support are required to pay a 25% loan fee. Students who enjoy a subsidised and contingent loan through HECS at public universities do not incur such a fee. Subsequently, students enrolled with an independent provider are required to loan 125% of their course costs to access HELP. The recently legislated removal of the 25% loan fee for independent universities and their undergraduate courses but not other independent providers, has created greater inequity within the independent provider sector. Consistent with representations to Government over recent years IHEA recommends that this inequitable tax on Australian undergraduate students enrolled with independent providers be removed for all students.

By creating a more equitable system through the abolition of the loan fee, RRR, along with other students, would be given greater choice about the provider they wish to enrol with. As independent providers often focus on more specialised fields of study, they can be a better fit for some students seeking a specialised education. They are often also smaller institutions than the large metropolitan universities and so their campuses may be less overwhelming for students from RRR backgrounds. Independent providers, therefore, may be a better choice for RRR students in some circumstances and so creating unnecessary cost barriers can be a deterrent to students making the choice to study at a provider that may be right for them.

Online or blended delivery mode courses can be a cost-effective method of studying in some RRR areas, bearing in mind the need for the student to be able to access quality internet service and other infrastructure necessary for studying in this manner. As recognised in the Framing Paper, access to this kind of infrastructure is crucial for RRR students being able to access higher education while not needing to move away from home. Many IHEA members provide a range of courses using online delivery. Increased government funding that could be accessible to independent providers targeted at improving the quality and variety of online courses providers could offer would assist with increasing the study options available to RRR students. Improving quality and range of online courses on offer and the variety of providers offering them would create more study options for students in RRR areas.

The current review of the Australian Qualifications Framework (AQF) also presents an opportunity to enhance the pathways for students from VET to Higher Education to encourage lifelong learning. Some of the options for improvement of the AQF that the reviewers are considering include improving credit transfer arrangements between institutions for different qualifications and for previously completed units. At present, the system of credit transfers is not consistent across institutions. By creating a more uniform system for credit transfers and Recognition of Prior Learning (RPL) it would be easier for students to understand how to arrange for credit to be applied to prior learning and previously completed qualifications. The reviewers are also considering the inclusion of micro-credentials in a recognised qualification framework. Including micro-credentials may assist RRR students by allowing them to complete a combination of online and other units in block study programs that require less time away from home than a traditional Bachelor degree. They could then build on a series of micro-credentials to complete a qualification. It may also present an opportunity for providers to deliver shorter courses in RRR locations that may be more cost effective to deliver than longer form qualifications.

The examination of the reallocation of Commonwealth supported places for enabling, sub-bachelor and postgraduate courses currently underway could be used to provide Commonwealth supported places specifically for RRR students that could be used to enrol with *any* provider. Using a voucher type system, students from RRR areas would be able to choose to attend a university or independent provider of their choice while receiving Commonwealth support for their education. Implementing a system such as this would allow greater options for students from RRR backgrounds to make decisions about their tertiary education based on factors other than expense and achieve better outcomes for their participation in higher education.

Challenge B: Relocating RRR Students face significant financial, emotional and social challenges

Our members have a variety of approaches to assisting students with the financial, emotional and social challenges they face when moving away from home to study at their institutions. These range from organising events in the early stages of the course for students to socialise with each other and get to know the rest of their cohort, to offering Wellbeing and Resilience Courses for students to undertake during the various stages of their course. One provider can provide accommodation to 90% of its undergraduate, on-campus students. This means that the ease of transition away from home is lessened by making accommodation accessible and convenient for their studies. They are also likely to know a larger number of their fellow students beyond the classroom setting. The encouragement of this level of interaction among the students and with the providers' staff assists with the challenges of social isolation sometimes felt by students that have relocated to complete their tertiary education. These types of social support are provided in addition to the academic and educational support students are also offered at these institutions.

Our providers identified accommodation access and costs, living away from home expenses, and general course costs to be the major barriers for RRR students enrolling with them. Supporting RRR students with these costs, providing subsidies, access to student loans for all students, or other means of reducing or deferring these costs would be beneficial for helping students from RRR backgrounds to continue with their tertiary study. There are also opportunities around better promotion of the fact that domestic students can access FEE-HELP when enrolling with many providers. Understanding the costs, but also the options for deferring or minimising these costs for their education may assist RRR students in gaining knowledge of the range of study options that are open to them.

IHEA members also identified the costs associated with travelling to metropolitan campuses for block mode study to complete blended-delivery courses as a barrier to RRR students enrolling at their institutions or completing their studies. Providing RRR students with bursaries or travel subsidies to attend institutions for block mode delivery or intensive study would assist with offsetting this cost of their education and in removing this barrier to encourage increased RRR enrolments. Even with the benefits of online delivery for allowing RRR students access to courses, studies have shown that the students feel more supported and a part of the learning community when online courses contain at least some face-to-face learning and teaching.[1] It would be beneficial for RRR students, then, to reduce the restrictions, such as cost, on allowing these face-to-face interactions to occur.

Challenge C: Raising aspirations for tertiary education

As mentioned above, there is potential for the current review of the AQF to lead to the improvement of the pathways between VET and Higher Education qualifications and to allow for more consistent and credible Recognition of Prior Learning and credit transfer systems. If this is an outcome of the review, there may be greater recognition by students from RRR areas of the options open to them. Greater awareness of the variety of providers in the Higher Education sector and the pathways to different careers may also raise aspirations for engagement in further education for students with RRR backgrounds. As stated in the Framing Paper, "[s]tudents from regional backgrounds are twice as likely as metropolitan students to have completed VET courses before enrolling in university."[2] This being the case, it is likely that increasing the pathways policy for articulation of VET qualifications into pathways to higher education qualifications may be an advantage for RRR students.

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[1] See, for example, Lim, Doo-Hun et al., *Online vs. blended learning: differences in instructional outcomes and learner satisfaction*, January, 2007, https://files.eric.ed.gov/fulltext/EJ842695.pdf

[2] Australian Government Department of Education and Training, *National Regional, Rural and Remote Education Strategy Framing Paper,* December 2018, pp. 6-7.

Many independent providers offer niche and specialised courses of study. By promoting the range of qualifications and specialised study options that some independent providers offer, RRR students may better understand the variety of career options open to them and this may assist in raising their aspirations for participation in higher education. Without an understanding of a full range of career options it is difficult for choices to be made about pursuing opportunities those careers may present. Good counselling at the high school level, by knowledgeable and qualified careers counsellors would assist with this. Ensuring this kind of counselling is provided for higher school students from RRR backgrounds would be a positive way forward.

Challenge D: RRR often experience multiple forms of disadvantage

Some IHEA members have developed programs and policies to assist students with multiple forms of disadvantage, such as bursaries for indigenous students to access accommodation and assist with living costs while attending a metropolitan campus. Scholarships are also offered for indigenous students to assist with tuition fees and educational costs. Some providers have programs in place for cultural and pastoral support as well as academic and career development support. These are designed to address issues around providing a safe cultural environment for the education of indigenous students. Many of the indigenous students who are in receipt of these bursaries, scholarships and social assistance come from regional and remote areas. These are some of the ways to address multiple forms of disadvantage some students from regional, rural and remote Australia face.

Challenge E: Attracting people and jobs to RRR areas

There are several different approaches that could be taken to attract people and jobs to regional areas.

IHEA supports the development of the Regional Study Hub initiative. These are designed to provide students from RRR areas with greater and easier access to the resources they need to complete distance learning. There may also be opportunities around the development of infrastructure funding to allow the same concept to be applied to the provision of resources for providers to deliver face-to-face teaching modules in regional areas. IHEA members have identified the cost of establishing regional facilities as a barrier to delivery of courses in regional areas. If that cost were to be limited or funding was available to develop resources and infrastructure, more providers may be able to extend their delivery to RRR Australia.

Better promotion of the quality of a range of providers would assist in making study at providers other than the major universities more attractive. Independent providers rate highly in QILT surveys for student satisfaction and other key measures that are important to students. In terms of skills development, learner engagement, teaching quality, independent providers rated more highly than universities in the 2017 QILT Student Experience Survey. In that survey, independent providers also rated much higher than universities for student support (77% positive responses as opposed to 72%).[3] Promoting the quality education that independent providers offer could improve the reputation and attractiveness of smaller, independent providers. The Framing Paper notes that students from RRR backgrounds are likely to need greater support from the institutions they enrol in. Independent providers, then, are well-placed to offer this support.

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[3] QILT 2017 Student Experience Survey National Report, March 2018, p. 11.

> **_Challenge F: Implementing and monitoring a national strategy_**
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> IHEA believes that the language used through the process of developing a national regional, rural and remote strategy to date demonstrates a university dominated focus. Limiting the strategy's development to policies relating to universities at the exclusion of other independent higher education providers potentially limits the opportunities for addressing the key challenges facing RRR students. It is important to ensure that any policies designed to expand access to higher education for RRR students include independent providers in order to allow for the widest set of options for addressing challenges facing RRR students. Language is important and the inclusive terminology of Higher Education Provider should be used in the strategy instead of university to ensure the focus is maximising opportunities and options for students from across the sector.
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> The definition of "regional" needs to be more relevant to the needs of the policy being developed. There are several different definitions of "regional" that are used by government in different contexts. The Department of Education and Training uses the Australian Bureau of Statistics (ABS) Australian Statistical Geography Standard (ASGS) to determine the level of remoteness of locations throughout Australia. According to this standard, Geelong, the Gold Coast and Wollongong are not considered regional. These are areas, however, where there is the infrastructure and resources, economic capacity and synergies between industry and education that allow for the delivery of a high-quality education. Members in these areas report having significant numbers of RRR students enrolled at their institutions. Supporting providers in these locations to attract more RRR students and to expand on their successes in this area would benefit larger numbers of RRR students. In a recent government funding allocation to regional universities using the current definition and framework a metropolitan Melbourne campus was awarded a grant. This seems inconsistent with the aim of providing greater educational opportunity for students from Regional Australia. Finding a definition of RRR and a framework for decision-making that has the most relevance to achieving the outcomes sought could assistance in the guidance of more effective policies.
>
> IHEA believes there could be value in the establishment of a National Regional Education Commissioner. Similar to international education, issues around regional education and the policies needed to address them are complex and relate to different government departments. In the area of international education a council was established to ensure interaction and consultation between the different departments involved in international education, including Immigration, Home Affairs, Education, Trade, Tourism, Foreign Affairs and Industry, Science and Technology. A National Regional Education Commissioner could act in a coordination role to ensure the various departments and areas of government policy that are impacted by policies and decisions about regional education are brought into alignment to achieve the most successful outcomes.

Please provide a short summary of the key points in your submission

Please limit your response to 300 words— **note:** any text above 300 words will be excluded from your submission. The table cell will expand to accommodate your response.

IHEA's submission is based around the following points:

- The National Regional, Rural and Remote Education Strategy should not be focused solely on universities but also examine ways to include independent higher education providers to diversify choice and options for RRR students.
- The 25% FEE-HELP loan fee charged only to students enrolled at non-university independent providers should be abolished so that RRR students (and no students) are penalised for choosing to study at an independent provider.
- More support, including funding, should be given to the development of online courses to extend the range of courses offered and improve their quality.
- The AQF review could be used to better articulate pathways between VET qualifications and Higher Education qualifications and to include micro-credentials, assisting RRR students to extend their aspirations beyond VET, even if this is their starting point. Micro-credentials could offer more flexible and varied study options for RRR students.
- Commonwealth supported places could be offered to RRR students who choose to undertake higher education, regardless of whether they choose to study at a university or an independent provider.
- Independent higher education providers offer a range of programs and support to address the needs of RRR students and their social, economic and emotional wellbeing.
- Independent providers also offer support to RRR students who face multiple forms of disadvantage.
- Better promotion of independent providers would assist RRR students understand their full range of options for tertiary study.
- Infrastructure cost and the expense of providing accommodation facilities are the biggest barriers to providers moving into RRR areas.
- An appropriate definition of Regional, Rural and Remote is needed to ensure it support the policy aims of the development of the strategy.
- A National Regional Education Commissioner could be a good office to use for coordination of various government departments and policies that impact RRR education.

Privacy Notice and Terms and Conditions for Submissions

Purpose for collection of information relating to submissions, and the use and disclosure of that information

The Australian Government Department of Education and Training (the department) invites you to make a submission in relation to the development of the National Regional, Rural and Remote Education Strategy (the Strategy).

Through the submission process, the department will be collecting certain information, including personal information. The information collected may include your name, your email address, the organisation you represent (if applicable) and any other information that is included in your submission.

The department may use and disclose this information for the purposes of informing or contributing to the Strategy, policy development related to the subject of the Strategy, publishing submissions (including by making submissions publicly available), and providing feedback to the department's Minister about the Strategy and submission process.

The department may also contact you to provide updates on the progress of the Strategy, if you have indicated in your submission response that you would like to receive such updates.

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The department reserves the right to publish any submissions, including only a sample of submissions, made in relation to the Strategy. This includes by making those submissions publicly available on the department's website, or through any report/s arising from the Strategy.

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If you are making a submission on behalf of an organisation, or represent that you are, you must ensure that you have that organisation's agreement prior to making the submission. By making a submission, you represent to the department that you have such agreement.

If there is information in your submission referencing an individual, which is not otherwise publicly available, you must ensure that you have the consent of the individual to whom the information relates to include it in the submission. By making a submission, you represent to the department that you have such consent.

By making a submission, you further represent to the department that your submission does not contain any confidential information about any individual or organisation.

Privacy policy and contact

For further information about the department's privacy policy and how it deals with information, including how you can access or correct your personal information, please see the department's privacy policy.

For any queries relating to this Privacy Notice and Terms and Conditions for Submissions, the Strategy or your submission please contact the Regional Education Strategy Taskforce via email on: RegionalStrategy@education.gov.au