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Department of Education, Skills and Employment
By email to: JobReadyGrads@dese.gov.au

Consultation Paper on the National priorities and industry linkage fund – response from Edith Cowan University

Edith Cowan University (ECU) is a large public university with a strong reputation for teaching quality. Significant Work Integrated Learning is built into ECU's curricula, and the university undertakes extensive engagement with industry for teaching and research.

Business/industry capacity

The NPILF's strong emphasis on universities' ability to demonstrate their commitment to engage with business and industry needs to be tempered by what we know about the capacity of Australian business to engage with universities. The recession and COVID-19 pandemic restrictions will, in the short- and medium-terms: reduce workforce capacity; increase financial pressures; and change workplace practices, including working from home, and social distancing. All these challenges will negatively impact the ability of business/industry to engage with universities and their students.

In addition, WIL, particularly in STEM+ discipline areas, is already extensive and, therefore, may quickly reach a point of saturation in which demand from competing universities cannot be met by suitable businesses.

It is recommended that: the Government consider measures to: (1) incentivise business/industry to engage with universities; (2) fund training of workplace supervisors so they have the confidence to participate in WIL and facilitate high quality WIL experiences; (3) provide pathways and incentives to support STEM+ graduate transitions to the STEM+ workforce; and (4) create more STEM+ jobs.

Ensuring equitable opportunities

As outlined above, WIL opportunities are limited by the number of suitable businesses (and supervisors within these). This particularly applies to businesses in regional and remote areas. In addition, students in regional and remote locations may have limited access to on-site WIL. Therefore, the NPILF should explicitly recognise online WIL, and other forms of off-site WIL (e.g., industry-connected problem-based learning projects) as eligible activities.

Although the Australian Government's focus is on domestic students and employment outcomes, universities will need to ensure that, where WIL is embedded in curricula, international students have comparable opportunities to participate. This has significant implications for upscaling delivery, and again, the capacity of business to meet demand.

It is recommended that: online and off-site WIL are included as eligible forms of WIL, with the Government providing the associated guidelines on measures of impact evaluation and reporting.

Align NPILF evaluation with existing policy and practice

The framework for NPILF evaluation should draw on existing guiding documents for WIL policy and practice for the sector, including:

- National WIL Strategy http://acen.edu.au/wp-content/uploads/2015/03/National-WIL-Strategy-in-university-education-032015.pdf
- WIL Quality Framework https://research.qut.edu.au/wilquality/

In addition, the framework for NPILF evaluation must enable sector benchmarking, and provide an efficient means of assessment and evaluation, to limit the administrative burden on DESE and universities.

It is recommended that: the framework for NPILF evaluation be based on existing guiding documents for WIL policy and practice.

Excessive administrative burden and selected metrics

The proposed planning and reporting processes appear onerous and DESE needs to consider ways to reduce the administrative burden on universities. As part of this, some metrics should be amended or removed:

- *Proportion of final year students rated as job ready* is difficult to define and rate, and may put undue pressure on students;
- *Increase/proportion of women in 'core' STEM courses (excluding health/architecture)* makes little sense for industries with an over-representation of women, e.g., biology, biochemistry and marine science, particularly at the entry career levels.
- *Improvement in graduate employment outcomes overall*: this assessment is likely to be based on highly lagging measures and is impacted by a wide range of factors outside of a university's ability to influence, as well as having limited direct correlation to work experience opportunities.
- *Increase/proportion of HDR students undertaking internships/placement within first 18 months (of commencing HDR)*: this particularly excludes initiatives specifically designed for late-stage PhD candidates, which assist in transitioning graduates into the workforce, e.g., the Industry and PhD Research Engagement Program (iPREP WA).

The draft NPILF metrics appear to be based on improvement and the lack of consideration of excellence metrics will disadvantage universities already performing well in STEM+ WIL delivery.

The draft NPILF metrics focus on quantifying WIL delivery (e.g., increased numbers/proportions of WIL experiences and partnerships with industry) and there appears to be no consideration of the assessment of quality. As the Consultation Paper notes, the quality of student experiences is important to the achievement of outcomes for students and graduates. Additional quality metrics might be selected from:

- student feedback on their perceived employability skills;
- workplace supervisor assessment data;
- take up of professional development for workplace supervisors; and
- industry-based professional development and secondments by university academics.

It is recommended that: the NPILF planning and reporting processes be streamlined, and the metrics set reconsidered and reduced in number.

Distribution of funds

The proposed Band Criteria distribution model, described in the Technical Note to the *Job-Ready Graduates* package, is inherently unfair for universities with Commonwealth Supported Places (CSPs) numbers just short of a higher funding band. For example, the average allocation is $358/CSP, but the allocation to the University of Tasmania is $328/CSP versus $413/CSP for Swinburne University. To maximise NPILF outcomes, adequate funding must be given where it is needed the most and a funding distribution based on dollars per EFTSL in the STEM+ discipline areas at each university would be more appropriate.

Weightings that favour small and regional universities would be justified only if strong evidence exists of significant additional costs for these providers in delivering WIL. In the absence of such evidence, this would likely result in under-utilised funds.

It is recommended: the methodology for the distribution of funds be changed to dollars per EFTSL based on STEM+ Unit Enrolments.

The implications of "under-performance"

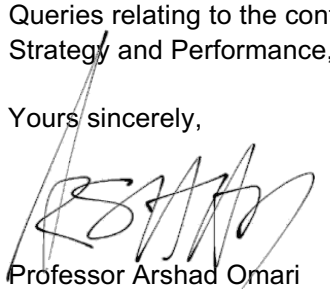
The Consultation Paper states (p. 9) that "Unlike the performance-based funding model … NPILF seeks to incentivise behaviours and mindsets…". However, the proposed withholding and redistribution of funds for "under-performance" against imperfect metrics makes the NPILF effectively another performance-contingent fund. The resulting funding uncertainty will impair our ability to plan and commit to longer-term engagement with businesses, undermining the realised benefits for students.

It is recommended that: consideration be given to the penalties for perceived "under-performance" and under-utilisation of funds to ensure that the NPILF incentivises business/industry engagement and provides funding certainty to universities.

Further information

Queries relating to the content of this submission may be addressed to Steven Newman, Manager Strategy and Performance, via s.newman@ecu.edu.au or (08) 6304 2296.

Yours sincerely,



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