

Submission to the *Review of Australia's Higher Education System*

The National Centre for Student Equity in Higher Education

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Executive Summary

The National Centre for Student Equity in Higher Education (NCSEHE or “the Centre”) endorses an approach to higher education policy that is grounded in inclusive participation. In accordance with the Review’s request for submissions to be concentrated on relevant areas of expertise, this submission is focussed on the “**access and opportunity**” area.

The submission is structured in relation to three broad principles that underpin access and opportunity in Australian higher education, and six undertakings that can positively impact on access, participation, and success in Australian higher education.

Broad Principles for Supporting Access and Opportunity in Australian Higher Education

These three broad principles characterise an Australian higher education system where individual equity policy undertakings will be more effective.

- 1.1 All young Australians should have access to high-quality, aspiration-building schooling in their formative years, regardless of their location, background, or personal circumstances.
- 1.2 The supply of higher education places should match demand. An under-resourced higher education system that necessitates competition for undergraduate places is a significant barrier to equity.
- 1.3 Policy should address significant financial and social barriers to accessing and fully participating in higher education.

Key Undertakings to Support Access and Opportunity in Australian Higher Education

- 2.1 Establish new national, contextual targets for higher education equity performance.
- 2.2 Support more outreach work by community-based, non-higher education providers.
- 2.3 Improve the quality and quantity of enabling programs.
- 2.4 Improve the quality and reach of online learning.
- 2.5 Develop a national strategy for supporting students with disability.

Recommendations

Based on NCSEHE's research and policy work, and in consultation with equity stakeholders in Australian higher education, the Centre proposes eight recommendations to the Review:

- **Recommendation 1:** That the Australian Government ensures that funding for schools be reviewed to ensure that the socioeconomic background of students and communities is not a barrier to aspirations or participation in higher education.
- **Recommendation 2:** That the Review seriously consider the case for the re-introduction of the Demand Driven Funding System (DDFS) to Australian higher education.
- **Recommendation 3:** That the Review examine two key elements of the Job-Ready Graduates policy package which are very likely to have a detrimental impact on student equity: the changes to student contributions and course cluster funding, and the introduction of the 50% pass rule.
- **Recommendation 4:** That the Review considers how the proposed Australian University Accords (AUAs) can set institutional equity targets that are ambitious, yet sensitive to the local context in which the institution resides.
- **Recommendation 5:** That the Review support community organisations, such as Regional University Centres, in conducting and leading outreach programs.
- **Recommendation 6:** That the Review investigate the extent to which the design and delivery of enabling programs are improving equity outcomes.
- **Recommendation 7:** That the Review investigate ways in which the quality and reach of online learning can be enhanced, particularly for equity students.
- **Recommendation 8:** That the Review endorse the development of a national strategy for disability in higher education, including an examination of UDL practices.

Introduction

The National Centre for Student Equity in Higher Education (NCSEHE or “the Centre”) is a policy and practice centre funded by the Australian Government Department of Education (“the Department”) and based at Curtin University in Perth, Western Australia.

The Centre’s core mission is to promote equity in access, experience, and outcomes for Australian higher education students and to initiate discussion and analysis at the national level around student equity issues. It undertakes this through the introduction of evidence-led policy and practice initiatives in Australian higher education, in partnership with universities, via activities such as: a Trial, Evaluation, Implementation and Monitoring (TEIM) Program; applied research and knowledge generation; capacity building for university staff; the development of a national data program on student access, participation and outcomes in higher education; and presentation of best-practice initiatives across the sector.

The NCSEHE thanks the Department and the Australian Universities Accord (AUA) Panel for this opportunity to provide a submission to the *Review of Australia’s Higher Education System* (“the Review”).

The Centre endorses an approach to higher education policy that is grounded in inclusive participation. In accordance with the Review’s request for submissions to be concentrated on relevant areas of expertise, our own submission is focussed on “**access and opportunity**”.

We understand that the Consultation on the Accord Terms of Reference is just the first stage, to assist the Panel in releasing a discussion paper in early 2023. Our initial submission is therefore relatively brief, outlining the key areas we believe should be explored in greater detail as the Australian Universities Accord is further developed.

We look forward to working further with the Panel throughout 2023, to assist them in their important work.

Australian higher education policy: a brief overview

Since the 1990s, Australian higher education equity policy has been guided by the principle of proportional fairness. This objective was outlined in 1990 and retains its relevance today:

The overall objective for equity in higher education is to ensure that Australians from all groups in society have the opportunity to participate successfully in higher education. This will be achieved by changing the balance of the student population to reflect more closely the composition of society as a whole (Department of Employment, Education and Training, 1990 p. 2).

In 1994, six key groups of students were identified as requiring particular attention:

- Aboriginals and Torres Strait Islanders (Indigenous)
- People from low-socio economic status (Low SES) backgrounds
- People from non-English speaking backgrounds (NESB)
- Persons with disabilities (students with disability)
- People from regional, rural, and remote areas of Australia (Regional or Remote)
- Women enrolled in non-traditional areas of study (WINTA). (Martin, 1994)

These categories are neither definite nor restrictive. Successive governments have placed greater or lesser emphasis on some groups over others, and groups of students not outlined above also receive attention. Again, the following statement made in 1990 retains its relevance:

... disadvantaged groups within society often cannot be clearly defined or differentiated, and ... there will be areas of overlap on an individual basis. Indeed, for individuals, an emphasis on the categories of disadvantage or the affixing of 'labels' will not be helpful [however] The Government does not accept that a lack of precision is sufficient reason to delay action to overcome the very real disadvantages apparent in our society ... (Department of Employment, Education and Training, 1990, p. v).

Despite significant gains over the last thirty years, access to higher education remains unequal. The Centre remains committed to advocating for policy that improves proportional representation in higher education and being guided by – but not restricted to – target groups of students identified by the Australian Government as requiring particular attention.

Strengthening the foundation of higher education to enhance equity

For over thirty years, there has been sustained, bipartisan support to ensure that access to higher education continues to improve for all Australians. In this time, the sector has approximately trebled to over 1.1 million domestic students. Within this overall growth has been a concurrent growth in enrolments of students that have historically been under-represented in higher education. However, whilst overall numbers have increased, proportional representation remains elusive for many groups of students (for an overview, see Harvey, Burnheim & Brett, 2016). As a result, the Australian higher education sector is still not representative of mainstream Australia and significant barriers persist for many students. Thus, participation and performance targets for equity groups remain highly relevant to addressing disadvantage in higher education.

To maximise the impact of targeted equity initiatives, we must first ensure that the foundation upon which equity is built is both maintained and strengthened. Without a strong foundation, equity initiatives may be diluted or represent a ‘band aid’ approach to overcoming disadvantage. Since 2010, the Australian Government has committed direct funding for equity initiatives, via the Higher Education Participation and Partnerships Program (HEPPP), with annual funding peaking in 2013 at \$189 million (ACIL Allen Consulting, 2017). While this financial commitment is valuable, it is relatively minor in terms of overall educational investment, which exceeded \$34 billion in 2018 (Hurley & van Dyke, 2020). It is therefore incumbent on the Australian Government to ensure that the higher education sector is in the best position to maximise its equity potential, and for higher education institutions to be held accountable for how they spend their equity funding.

This equity foundation relies on three, broad principles. First, that *all Australians have access to high-quality, aspiration-building schooling in their formative years*, regardless of their location, background, or personal circumstances. Second, *the supply of higher education places matches demand*. Third, *there are no significant financial barriers to accessing, and continuing in, higher education*.

Access to high-quality, aspiration-building schooling

We realise that discussion regarding school funding may be out of scope for the Review. However, we believe reference must be made in our submission due to the essential importance of ensuring that all students have access to a high-quality education in their formative years, which builds both the aspiration and ability to succeed in higher education. Without this groundwork, targeted outreach activities by higher education providers will be much less effective, and retention and success rates for disadvantaged students will continue to lag those of other students. Put simply,

reduced aspiration due to reduced school and family resourcing is an issue in secondary education (see for example Li & Dockery, 2015).

In 2011, the *Review of Funding for Schooling* identified an unacceptable link between low levels of achievement and such measures of educational disadvantage, particularly among students from Low SES and Indigenous backgrounds (Gonski et al., 2011). A key outcome was the adoption of the Schooling Resource Standard (SRS), which provides an estimate of how much total public funding a school needs to meet its students' educational needs. The SRS provides a base amount for each student, with additional payments based on the school community's capacity to contribute. However, whilst the theory is sound, in practice there are still significant discrepancies. In 2018, the Grattan Institute noted that "no funding model is or can be perfect, and the SRS model will need ongoing refinement over time" (Nolan, 2018). Analysis in 2020 indicated that the funding gap continued to grow between government schools – which educate most disadvantaged students – and non-government schools (Ting, Liu, & Scott, 2020).

In 2020, the Australian Government introduced a new method for calculating a school community's capacity to contribute, based on a Direct Measure of Income of parents and guardians of students at a school (Australian Government Department of Education, 2022). It is perhaps too early to establish whether the new methodology has addressed funding imbalances in the system, but it is critical that the funding be adjusted if it is found to not do so.

Recommendation 1: That the Australian Government ensures that funding for schools be reviewed to ensure that the socioeconomic background of students and communities is not a barrier to aspirations or participation in higher education.

Ensuring the supply of higher education places matches demand

The most effective approach to ensuring that the supply of higher education places matches demand is through a return to the demand driven funding system (DDFS).

Domestic undergraduate enrolments have been affected by two major policy shifts since 2011: the introduction of the DDFS over 2011-12, whereby places in higher education were uncapped; and its effective cessation at the end of 2017. The potential impact of both approaches to funding on Low SES students can be gauged in Figure 1, which tracks the growth in total domestic undergraduate and Low SES (SA1 measure) commencements. Over the period between 2011 and 2017, undergraduate commencements exhibited substantial growth. However, from 2018 (when the DDFS was discontinued) to 2020 (the latest year for which full-year data are available), the

system saw flat growth in overall commencements and a decline in Low SES commencement numbers. There was a recovery in overall and Low SES commencing numbers in 2020, most likely due to the onset of the COVID-19 (COVID) pandemic, but the percentage growth in Low SES commencements was lower than for all students.

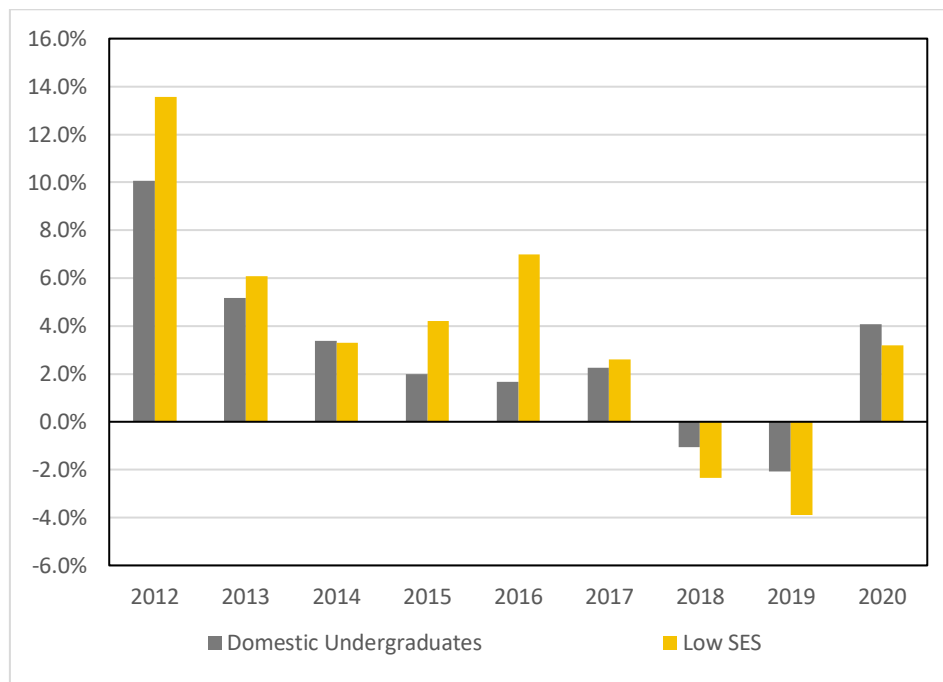


Figure 1. Access to Higher Education: Growth in Commencing Enrolments – Domestic Undergraduates and Low SES Students, 2012 to 2020.

Source: Australian Government Department of Education (2021).

While some of the downturn in numbers in the period immediately following the cessation of the DDFS may be attributable to the rate of earlier growth, the very noticeable out-performance of Low SES commencements – both positively and negatively – suggests that the DDFS affects access to university among equity students more profoundly than other groups. This finding was also reached by the Productivity Commission in its 2019 review of the DDFS (Productivity Commission, 2019).

Specifically in respect of equity, research clearly demonstrates that constrained supply presents one of the greatest barriers to proportional representation. This was observed as early as 1970 by Martin Trow, in his observations of the effect of the US higher education system transiting from the ‘elite’ to the ‘mass’ stage (Trow, 1970, 1974). When higher education places are constrained, universities are more likely to admit students who have had access to greater educational resources, such as elite schooling and extracurricular tutoring. However, the more closely the supply of places matches demand, university admission processes focus more on the applicant’s

background and potential to succeed, rather than rank and offer to a select few. This is particularly the case for prestigious universities and/or courses. Here, research in the Australian context has found that the change in supply of university places can “have a profound effect on the opportunities of secondary-school completers – particularly those in more educationally disadvantaged settings” (Edwards, 2008, p. 287).

As indicated in Figure 1, Australia’s own (albeit truncated) experience with the DDFS evidences a correlation between matching supply to demand and increasing the proportional representation of some disadvantaged groups. At the same time, research by the Centre did not find evidence of any significant decline in academic standards, as measured by the overall retention and success of students (Pitman, Koshy, & Phillimore, 2015). More recent research by the Productivity Commission (2019) did identify higher dropout rates by the additional students coming into the system due to the DDFS, many of whom came from an equity background. Nevertheless, the Commission found that a clear majority of such students still graduated (Productivity Commission, 2019, p. 7).

Furthermore, most analysis of the DDFS on equity performance has tended to consider only the sector-wide effect, or the effect on certain university groupings (e.g. Productivity Commission, 2019; Norton, 2019). This obscures the potential for differential performance at the individual institutional level. Table 1 lists the institutions who between 2011 and 2017 (the period that the DDFS was in effect) increased their institutional share of undergraduate Low-SES enrolments at a rate greater than the sector average.

Looking at the 15 universities achieving this benchmark, there is representation across four states and the major institutional groupings – the Group of Eight (Go8), Australian Technology Network (ATN), Regional Universities Network (RUN); and Innovative Research Universities (IRU). Further, universities with well-above *and* well-below sector averages in Low SES share of enrolments were represented, as were regional and metropolitan institutions. This indicates that the benefits of the DDFS for increasing Low SES participation were not confined to a particular type of university based on location, mission, or prior equity performance, nor was any type of institution without the potential to improve equity performance over this period. Furthermore, we show the change in institutional share from 2017 to 2020, the period after the DDFS was frozen. This shows that nine institutions followed the rest of the Table A providers in showing a decline in their Low SES enrolment shares, with six managing to post only marginal improvements. Whilst causation cannot be definitively attributed, there is a clear correlation between increasing supply and improved equity performance, as well as vice-versa.

	2011	2017	2020	Percentage Point Change (PPC)	
				2011-2017	2017-2020
All Table A Providers	15.23	17.16	16.88	1.93	-0.28
Federation University Australia (RUN)	20.63	28.15	27.41	7.52	-0.74
Western Sydney University	22.77	29.87	30.13	7.10	0.26
Swinburne University of Technology	10.59	17.08	16.31	6.49	-0.77
Curtin University (ATN)	11.71	16.00	16.09	4.29	0.09
Murdoch University (IRU)	16.17	20.01	20.75	3.84	0.74
University of South Australia (ATN)	21.04	24.79	24.83	3.75	0.04
The University of Western Australia (Go8)	5.43	8.97	9.33	3.54	0.36
Edith Cowan University	14.39	17.87	17.28	3.48	-0.59
University of Technology, Sydney (ATN)	10.43	13.79	13.09	3.36	-0.70
Victoria University	22.13	25.44	23.65	3.31	-1.79
The University of Adelaide (Go8)	12.00	15.24	16.31	3.24	1.07
La Trobe University	16.38	19.52	18.60	3.14	-0.92
University of Wollongong	15.30	18.36	17.82	3.06	-0.54
Macquarie University	7.17	9.98	9.42	2.81	-0.56
The University of Sydney (Go8)	6.91	9.57	9.05	2.66	-0.52

Table 1: Domestic Undergraduate Low SES Participation under the DDFS: Participation Rates for 2011, 2017 and 2020 and Percentage Point Change (PPC) – 2011 and 2017; 2017 and 2020

Source: Australian Government Department of Education (2021). University membership of groupings or 'unaligned' status is sourced from Koshy (2021).

Recommendation 2: That the Review seriously consider the case for the re-introduction of the Demand Driven Funding System (DDFS) to Australian higher education.

Removing significant financial barriers to accessing, and continuing in, higher education

The NCSEHE emphasises that close attention should be paid to the impact of financial barriers on the ability of students – particularly equity students – to access and continue in higher education.

The Centre has previously identified concerns around the introduction of the Job-Ready Graduates policy package (NCSEHE, 2020). These relate primarily to changes in student contributions to Commonwealth Supported Places (CSPs) and the linking of ongoing CSP status to pass rates.

The NCSEHE notes that research on the impact of student contributions (via HECS-HELP) on subject choices tends to indicate that they play a very muted role in affecting student decisions (Chapman & Khemka, 2022; Chapman & Ryan, 2005). This calls into question the underlying rationale for changes to cluster funding introduced as part of Job-Ready Graduates (JRG), namely that changes in student contribution levels would affect subject choice via the channel of increased demand for lower price subjects. In looking at longer-term effects, there is a paucity of evidence on the relative impact of changes on equity students and the extent to which HECS-HELP debt impairs students' ability to ensure financial security. In this context, it is important to note that significant increases in student contributions under the JRG were seen in some fields of study dominated by equity student enrolment in the funding clusters that saw major increases in student contributions, notably in the Humanities cluster (Chapman & Khemka, 2022).

Another important JRG measure was the introduction of the pass rate rule, whereby students who have not passed at least 50% of their units (after a minimum of eight units for bachelor or higher degree, or four for other students) can lose CSP status. This is likely to have a more pronounced impact on equity students, given they have lower rates of successful unit completion – for instance, 70.4 per cent among Indigenous students compared to 84 per cent overall (NCSEHE, 2020).

More generally, there is a need to track and analyse the ongoing ability of students to manage their financial situation in view of living costs and life-work-study balance. Currently, this evidence is partially captured in the Student Experience Survey (SES) and, more completely, in the Student Finances Survey, conducted by Universities Australia every five years, the last of which was undertaken in 2017 (Universities Australia, 2018). The contemporaneous annual or bi-annual collection and reporting of student financial health would enable the monitoring of the impact of financial stress and related pressures on university students.

Finally, there is some concern that, because of the new HECS-HELP repayment thresholds enacted by the previous government in 2019, graduates earning less than \$58,000 per year have seen their annual repayments increase, whilst those earning above \$58,000 (up to \$95,000) have seen their annual repayments decrease (Mackey, 2019; Norton, 2022). Norton refers to this as a “policy error” and further observes “with HELP [now] including more than a million people in the repayment phase, it has broad social policy consequences” (Norton, 2022). This wide reach of HELP, combined with the inequitable changes enacted under the JRG, are strong reasons to carefully review the HELP scheme.

Recommendation 3: That the Review examine two key elements of the Job-Ready Graduates policy package which are very likely to have a detrimental impact on student equity: the changes to student contributions and course cluster funding, and the introduction of the 50% pass rule.

Targeted initiatives to improve equity in higher education

Whilst a strong foundation is the prerequisite for improving access and opportunity in higher education, equity-targeted interventions, programs, and policies are required to support students who continue to face structural barriers to accessing and succeeding in higher education.

Establishing new national, contextual targets for higher education equity groups

The 2008 *Review of Australian Higher Education* (“the Bradley Review”) recommended an explicit target for students from low socioeconomic backgrounds (Low SES students) in relation to participation: that Low SES students would account for 20 per cent of all domestic undergraduate students in Australia by 2020 (Bradley, Noonan, Nugent, & Scales, 2008). This target was endorsed by the Rudd and Gillard governments as part of their response to the Review, but not adhered to by subsequent governments. In 2020, Low SES students accounted for only 16.8 per cent of domestic undergraduate enrolment (Koshy 2021).

The future direction of setting national targets for equity groups rests on three questions:

1. Which Equity Groups?

The NCSEHE endorses the findings of the *Review of Equity Groups in Australia* (Tomaszewski et al., 2018) which largely affirmed the current system of equity classification and found evidence that students from four population-based equity groups were less likely to participate and succeed in education: Low SES; Regional/Remote; Indigenous; and Disability. In addition, the *Review of Equity Groups* advocated that the Regional and Remote student groups be split into two, given the more pronounced levels of educational disadvantage observed in remote areas; and that the two remaining groups, WINTA and NESB students, be defined at a more granular level, with the focus in NESB shifting to smaller groups on the basis of language or immigration backgrounds (e.g., refugees) and WINTA redefined to exclude areas of study where women are approaching 50 per cent of enrolment.

The Review called for medium-term monitoring of different types of disadvantage, requiring more granular indicators for Low SES, in addition to capturing measures around age demographics, delayed entry and traditionally undefined groups such as care leavers, carers and LGBTIQ+ people. Finally, the Review called for a long-term framework for examining current and emerging equity issues.

2. Which Measures?

Historically, Australia has implemented equity policy primarily in relation to participation targets for low-SES students, notably through HEPPP. In 2019, the *Review of Performance-Based Funding*

for the *Commonwealth Grant Scheme* advocated a continuation of this approach as part of its proposed system, with the inclusion of a performance measure for Indigenous, Regional, and Low SES student participation as part of a framework that included measures of overall student success and outcomes. This approach is now embedded in Australian higher education policy through the creation of the IRLSAF and use of the participation target in the performance-based funding mode.

An important consideration in target-setting in equity policy is the compounding challenges equity students face, due to unique or increased barriers or under-resourcing. These have resulted in critical issues emerging across the student life cycle:

- Lower levels of retention (Li & Carroll, 2017; Stevenson et al., 2021).
- Lower levels of success and completion (Walker-Gibbs et al., 2019).
- Disadvantage due to institutional culture (Naylor & Mifsud, 2019).
- Specific issues in relation to individual equity groups, for instance —
 - Indigenous student progression (Uink et al., 2022)
 - Overall support for students with Disability (Pitman, 2022).
- Unique challenges in relation to career thinking and planning (Bennett et al., 2021; Groves et al., 2022).

The NCSEHE endorses the widening in scope under the IRLSAF, but also endorses formal approaches to measuring and reporting on the performance of all equity groups across the study life cycle (i.e., from “access” to “post-graduate outcomes”).

3. Which Targets?

Research on equity performance rankings in Australian higher education undertaken by the NCSEHE, in conjunction with the Australian Council for Educational Research (ACER), found that the choice of measure or combination of measures has a definitive impact on institutional rankings in a system where some institutions naturally enrol more equity students in comparison with those who may have lower equity enrolments but better outcomes (Pitman et al., 2019; Pitman et al., 2020).

The Centre advocates two approaches to overcome this weakness in ranking or performance measurement systems. First, measures of equity performance should ideally be either composite measures spanning the life cycle or specific measures with some direct link to institutionally appropriate targets. Second, targets should be set that include specific reference to the operating contexts of institutions, notably their draw-pools or catchment areas, a policy consideration raised over a decade ago by Centre researchers in direct reference to the Low SES targets (Phillimore & Koshy, 2010).

Furthermore, consideration should be given to measuring the “internal performance gap”. This refers to the difference between a given measure for an equity student group, and the same measure for non-equity students – a concept that is formally endorsed in Australia’s reporting of equity performance measures. Research has shown that considering the internal performance gap provides insights into another aspect of fairness: namely that an institution is ensuring its equity students are achieving the same success as all its students, regardless of the external context (Pitman et al., 2019).

Whilst being institutionally and context specific, this does not mean that equity targets should not be ambitious. If set as a stretch goal, equity performance will be significantly improved even if the specific target is not reached.

Finally, a recent NCSHE-funded report identified considerable under-representation by equity group students by field of education (Cakitaki, Luckman and Harvey, 2022), including the persistent under-enrolment of women in courses such as Computer and Information Systems and Engineering, but also the general underrepresentation of certain equity groups in areas such as Law and Creative Arts. A key recommendation from that report was the future reporting of participation and achievement data by major equity groups by field of education and the 21 QILT study areas (QILT, 2022).

Recommendation 4: That the Review considers how the proposed Australian University Accords (AUAs) can set institutional equity targets that are ambitious, yet sensitive to the local context in which the institution resides.

Supporting more outreach work by community-based, non-higher education providers

The purpose of outreach work in higher education is to foster aspiration among secondary students and members of the community as well as providing potential students with information about university study options and processes. The introduction of the HEPPP formalised funding for outreach work on an ongoing basis, but its central feature is that core funding is provided only to universities. There is also no mechanism in HEPPP funding to ensure that universities cooperate with one another in the delivery of pre-access interventions (ACIL Allen Consulting, 2017). As a result, HEPPP programs are generally managed at the single institution level.

We know from research that to raise higher education aspirations, outreach needs to target students in the primary years of education as well as the secondary years (Gore et al., 2015; Jaremus et al., 2022). However, it has been estimated that only 15% of HEPPP funded outreach

projects targeted primary school students, compared to 64% targeting secondary school students (ACIL Allen Consulting, 2017).

Research funded by the NCSEHE (Austin et al., 2022; King et al., 2022) has shown the importance of community involvement in outreach and careers advice to high school students considering the transition to university, particularly in regional areas, where voices independent of individual universities may be more valued. This includes the potential to utilise the support and infrastructure available through Regional University Centres (RUCs).

Although not the norm, there have been instances of collaborative approaches to outreach. For example, the Widening Participation Program (WPP) in Queensland was a consortium of nearly all major universities in the state that was managed in conjunction with the Queensland Department of Education and Training. A study of the WPP by NCSEHE identified key strengths of this approach particularly in relation to school engagement in regional and remote Queensland (Zacharias et.al, 2018).

While even this level of cooperation at the university level is limited in Australia, even rarer is collaborations between universities and government or community organisations in the delivery of outreach programs, including organisations such as the RUCs, local government authorities, and private sector providers with substantial involvement in secondary education. Notably, this list also includes state government education departments. There is already evidence that RUCs are highly valued by their local communities in terms of delivering support for students already enrolled in higher education (e.g., Stone et al., 2022). To date, however, less is known about their ability to provide outreach activities more effectively than those controlled by the universities.

In addition, the Commonwealth has the infrastructure for funding education and vocational interventions through community organisations, notably the Community Grants Hub (<https://www.communitygrants.gov.au/>) which provides administrative services for community funded project across a range of government agencies.

An example of a major project funded via the Community Grants Hub is the Smith Family's Growing Careers Project, which attracted \$38.2 million from the Department of Education over four years (2020-21 to 2023-24) to support up to 76,725 disadvantage students across Australia to complete Year 12 and successfully transition to work or further education and training.

Recently, the Department has funded some pilot work to establish the effectiveness of outreach activities initiated and controlled by a Regional University Centre (RUC). In this model, the RUC works on behalf of the local community to establish what their educational aspirations and needs are, then invites universities to address these needs. Whilst it is too early to empirically evaluate the effectiveness of this approach, we understand through our discussions with the RUC Network

that the early feedback has been promising. For example, anecdotal evidence is that RUC-delivered outreach is viewed with less scepticism by the local community than that of a single university and is better at providing information and advice that is more relevant to the local community.

- **Recommendation 5:** That the Review support community organisations, such as Regional University Centres, in conducting and leading outreach programs.

Improving the quality and quantity of enabling programs

A NCSEHE report on enabling programs in 2014 identified both a diversity of offerings across the sector in terms of course length, content, and mode of delivery, but also a lack of transparency, transferability and information about program offerings that hindered student uptake and mobility (Pitman et al., 2016).

The report highlighted several contributing factors to these outcomes. Enabling program design, offering and information lacked consistency across institutions, minimising the extent to which students could gain recognition for participation when transferring between institutions. Program intake was generally unrestricted, except for targeted programs for Indigenous students. However, it was observed that equity group students constituted a higher proportion of enabling program enrolments than other sub-bachelor degree pathways.

More positively, Pitman et al. (2016) found that equity students who articulated from enabling programs experienced better first-year retention rates than those articulating via most other sub-bachelor pathways. Enabling program participants expressed higher levels of satisfaction than those entering university via VET pathways, suggesting that embedding enabling programs in university study had advantages for students, notwithstanding the weaker levels of recognition associated with enabling program participation compare with VET courses.

Pitman et al. (2016) had four broad recommendations for the restructuring of enabling programs to enhance these outcomes:

- Better alignment of course content, structures, and processes with those of the institution's undergraduate course offerings.
- Ensuring program content provided both generic and specific knowledge content to students.
- Enhancing the capacity of enabling programs to focus on academic skills development.

- Providing clearer and more transparent information to prospective students about the advantages of enabling programs.

In addition to these recommendations, the Review may also wish to examine and recommend changes to the design and delivery of enabling programs across the higher education system and to the extent to which program delivery requires a national framework or is governed explicitly through the Australian Qualifications Framework (AQF). This was supported in the 2019 review of the AQF which called for the recognition of micro-credentials in the AQF (Noonan, 2019; p.62).

Furthermore, since the research cited above was undertaken, the sector has witnessed a proliferation of alternative pathways programs that broadly match the definition of ‘enabling’, but are significantly different in respect of structure, duration and targeted audience. These range from ‘intensive’ four-week summer programs to three-month programs; more traditional, six-month courses; and online and on-campus courses. Often, equity students are not specifically targeted. Finally, it is often difficult to tell whether these programs are funded through the Enabling Loading Program (ELP), the general Commonwealth contribution, or a mixture of both.

Recommendation 6: That the Review investigate the extent to which the design and delivery of enabling programs are improving equity outcomes.

Improving the availability and quality of online learning

Historically, retention and completion rates for online learners have lagged those of on-campus students (Stone, 2017). The advent of the pandemic in 2020 saw the sector pivot quickly to offer online learning to all students out of necessity. In doing so, it revealed simultaneously the potential of online learning to: widen participation among disadvantaged students; provide greater opportunities for all students; and affect the perceived quality of higher education through the delivery of sub-standard online learning offerings (Pitman, 2021).

Because of the rushed and haphazard way universities switched to online learning during COVID, the stereotype that online learning is an inferior, sub-standard mode of teaching has been reinforced, despite evidence that students are requesting this flexibility be continued (White, 2022; Teague et al., 2022; Pitman 2021; O’Shea et al., 2021). Research has shown that online working is valued more when students are given the choice of study mode, that is, not being directed one way or another (Pitman, 2021; Stone, 2017). During COVID, preliminary research undertaken by the Tertiary Education Quality and Standards Agency (TESQA) found that students appreciated the opportunities afforded to them by online learning. However, many students also experienced IT-

related issues, a lack of staff expertise working with the IT, and a greater sense of isolation (Tertiary Education Quality and Standards Agency, 2020; 2021).

Evidence from NCSEHE research indicates that online teaching creates challenges for many equity students across a variety of contexts. This includes work looking at: culturally and linguistically diverse migrant and/or refugee (CALDMR) students during the COVID shutdown (Baker et al., 2022); issues around online work-integrated learning (Bell et al, 2021); and the inclusive and equitable use of “open textbooks” delivered through digital platforms (Lambert & Fadel, 2022). The pandemic and the move to online learning also entailed a shift in teaching practice. Teaching staff across the education system were required to adapt their teaching practices quickly to an online format, and these additional demands have added more stress to an already demanding environment (Billett et al., 2022; Vernon et al., 2022).

The concern, therefore, is that post-COVID, universities may retreat from their current engagement in online learning, towards the relative comfort of ‘business as usual’. Rather, we argue, Australian universities have an incredible opportunity to build upon the lessons learnt during the pandemic and increase both the reach and quality of their online offerings. This may require additional support and funding from the Australian Government.

Recommendation 7: That the Review investigate ways in which the quality and reach of online learning can be enhanced, particularly for equity students.

Developing a national strategy for supporting students with disability

The higher education sector is bound by the *Disability Discrimination Act (1992)* and is guided by the *Disability Standards for Education (2005)*. Furthermore, most institutions have developed their own disability action plans and/or forward strategies. To date however, there has been no nationally coordinated disability strategy in higher education. It is therefore unsurprising that institutional performance in respect of students with disability is, simultaneously, systemically under-par, yet with widely varying institutional outcomes.

For example, in 2020, the median participation rate for students with disability was 7.4 per cent, against a national benchmark of 8.4 per cent, with only 13 of Australia’s 38 Table A Providers exceeding the benchmark. However, institutional rates ranged from 2.4 to 14.2 per cent, evidencing wide variance in institutional performance contributing to overall systemic underperformance. With other equity groups (for example, Regional and Low-SES students) this variance could be explained, at least partially, by demographic factors. With disability, however, the

variance across states and territories is not significant enough to attribute to individual institutional underperformance alone (Australian Government Department of Education, 2021).

Underperformance is also the hallmark of other equity indicators for students with disability. Students with disability have lower rates of retention, success, and completion than those without disabilities (Pitman, 2021). They also experience, generally, lower graduate outcomes than other students (Pitman, Roberts, Bennett & Richardson, 2019). This underperformance is even though disability has been the fastest growing equity group over the past decade. While we have seen persons with disability enter higher education in record numbers and at a record rate, we have not seen a comparable improvement in how they are being supported in succeeding, in most institutions.

The Centre believes there is great potential in directing and supporting the sector to develop and adopt a national disability strategy for higher education, to encourage the sector towards improved performance in this regard.

The strategy should encompass the entirety of the student experience; however, we wish to draw attention to one aspect worthy of particular attention: encouraging greater efforts towards the adoption of the principles of Universal Design for Learning (UDL).

Universal design for learning (UDL)¹ is a framework to maximise learning outcomes for all students, considering multiple learning styles, strength and needs. UDL operates across the entirety of the learning experience, namely:

- Engagement – stimulating interest in learning.
- Representation – presenting information and content in different ways.
- Action and Expression – providing multiple ways in which students can demonstrate their understanding of what they know (Center for Applied Special Technology, 2022).

UDL recognises there is no ‘average’ learner. Learners come with a wide variety of prior experiences, abilities, preferences and needs (Australian Disability Clearinghouse for Education and Training, 2022). Thus, it requires institutions to adopt a whole-of-systems approach to ensure the built environment, technology, curriculum, and organisational processes align more closely with a learner-centred approach to pedagogy (Moriña, 2017; Bel & Bradburn, 2008). UDL is particularly beneficial for students with disability for two reasons. First, it provides a more inclusive learning environment and directly improves educational outcomes. Second, it allows more students with

¹ A brief note on terminology: Universal Design is the design of an environment so that it can be accessed by a wide range of users. Universal Design for Learning is a framework to optimise learning outcomes for diverse learners. Whilst acknowledging the difference, this submission uses the term UDL to refer to the overall higher education experience.

disability to keep confidential their condition, as they do not need to request specific adjustments or accommodations to support their learning (Pitman, 2021). However, the benefits of UDL are felt more widely. For example, whilst closed captioning of recorded lectures supports D/deaf students, it also enhances learning for other groups, such as many from non-English speaking backgrounds (Kent et al., 2017).

As with online learning – which is itself an element of UDL – the higher education sector is already engaged in many aspects of UDL. However, there is not yet a clear, national strategy to support universities towards greater adoption of UDL.

Recommendation 8: That the Review endorse the development of a national strategy for disability in higher education, including an examination of UDL practices.

Further Work

The NCSEHE has a wealth of experience and expertise in higher education and equity. It is keen to assist the Review Panel's deliberations over the next twelve months by providing summaries of existing research and undertaking new research, analysis and evaluation as appropriate.

The introduction of the demand driven funding scheme at around the same time as that of HEPPP has made it very difficult to assess the impact of each policy separately (ACIL Allen Consulting, 2017, p. xvi). In addition, evaluation of individual HEPPP projects has been uneven and generally unable to quantify impacts and effectiveness on a range of indicators (Productivity Commission, 2019, p. 24). Evaluation, particularly of HEPPP-funded activities, needs to be improved to ensure that there is a solid evidence base about how best to support student equity within universities.

The new Student Equity in Higher Education Evaluation Framework (or SEHEEF) that has been developed for the Australian Government (Robinson et al., 2021) is an important and welcome step towards developing a culture of equity evaluation within universities (Productivity Commission, 2022, p. 103). The NCSEHE will play an integral role in promoting the SEHEEF across the sector in the coming years. In addition, the Centre's new focus on trialling, evaluating, implementing, and monitoring equity projects – in partnership with the sector – will complement and extend evaluation activities being undertaken as part of SEHEEF.

As noted in the Introduction, this submission responds to the Panel Review Chair's initial request to identify our priorities for the Review process. Consequently, we have focused on the issue of 'access and opportunity'. However, several other issues listed in the Review's Terms of Reference also have equity implications and can influence access and opportunity in higher education – in particular, the issue of 'the connection between the vocational education and training and higher education systems'. The Centre will refer to this and other issues in subsequent submissions to the Review Panel.

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