

19 December 2022

Prof. Mary O’Kane  
Chair  
Universities Accord Panel  
C/- Department of Education  
GPO Box 9880  
Canberra ACT 2601

Dear Professor O’Kane

Submission by Open Universities Australia Pty Ltd (OUA) on the priorities of the Universities Accord Panel (Panel) in the context of its Terms of Reference

On behalf of OUA, thank you for this opportunity to make a submission to the Panel.

The aims of this review – to improve the quality, accessibility, affordability, and sustainability of higher education, to achieve long term security and prosperity for the sector and the nation – are highly aligned with OUA’s purpose.

For the last 30 years OUA has existed to empower learners to access the education that is right for them. We believe that education has the power to transform the lives of individuals, their families and communities and should be accessible to all.

With our primary focus on supporting access to the best higher education choice for all lifelong learners, this submission considers four of the seven key areas canvassed in the Terms of Reference, namely:

1. Meeting Australia’s knowledge and skills needs, now and in the future
2. Access and opportunity
3. Investment and affordability
4. The connection between the vocational education and training and higher education systems

We believe that OUA can offer unique insights into the review. As a company that has supported over 450,000 students into 27 different universities across over 950 qualifications and 2,700 unbundled single subjects, OUA has operated for three decades at the forefront of enabling accessible, flexible, online education opportunities for all Australians.

OUA makes the following submissions:

1. Meeting Australia's knowledge and skills needs, now and in the future

*An objective of the review is to enhance the delivery of quality education that meets the needs of students across all stages of lifelong learning and develops the skills needed now, and in the future. The Panel has been asked to include recommendations for new targets and reforms recognising that more than nine in ten new jobs will require post-school qualifications, and fifty per cent of new jobs are expected to require a bachelor's degree or higher.*

Background

- OUA was originally established as a government initiative to promote and support access to lifelong learning for all Australians, regardless of prior academic attainment, geography, or social background.
- OUA predominantly caters for students who have entered the workforce without a degree, or who need a different qualification to advance their career or pursue a new job. The delivery of quality, online education offers working students the flexibility they need to continue working while studying.
- By supporting approximately 35,000 students annually to access unbundled undergraduate and postgraduate education across 27 Australian universities, the OUA marketplace is emerging as a unique national platform for portfolio innovation and the identification of the evolving knowledge and skills needs associated with lifelong learning.
- With its 30-year history of offering qualifications via an online and student advisor-supported marketplace, OUA aspires to support all students impartially by better matching their study goals with the qualification that is right for them.

Priority Issues within Key Area

- The ongoing proliferation of post-secondary credentialled and non-credentialled learning possibilities have increased the challenges that students confront in confidently and effectively navigating, comparing, and enrolling in courses that are right for them. Several government initiatives from QILT, CourseSeeker, CompareED and MicroCredSeeker have sought to assist students in navigating this complexity, but it remains unclear to what degree these have been successful from a student's perspective (and delivered measurable utility such as improved student engagement and satisfaction, an improved understanding and appraisal of options, or better matching). More effectively connecting students to the courses that are right for them should be a priority for the Panel as it will be a key dimension of meeting Australia's knowledge and skills needs, now and in the future.
- The needs of students across all stages of lifelong learning will always include building inherently human skills like communication, collaboration, critical thinking, and creativity. Ensuring that sufficient funding or Commonwealth Supported Places are always available for the development of these skills is essential.
- It is OUA's view that the Australian Qualifications Framework (AQF) is sound and provides an appropriate regulatory framework for assuring students and employers

about the content and quality of qualifications for all levels of learning (education) and skills (training) in Australia. The self-accreditation feature of the AQF allows universities to be responsive to changes in demand (from both students and industry) and changes in educational practice. As the AQF was reviewed in 2019 after consultation with the sector, it is OUA's submission that revisiting reforms of the AQF should not be a high priority for the Panel.

## 2. Access and opportunity

*An objective of the review is to improve access to higher education, across teaching, learning and research.*

*The Panel has been asked to include recommendations for new targets and reforms to support greater access and participation for students from underrepresented backgrounds (including First Nations Australians, those from low socio-economic backgrounds, people with disability, and regional and rural Australians).*

### Background

- Article 13 of the International Covenant on Economic, Social and Cultural Rights recognises the important personal, societal, economic, and intellectual benefits of education. Article 13(2)(c) recognises that, for the full realisation of the right to education, higher education shall be made equally accessible to all, on the basis of capacity, by every appropriate means. OUA plays a valuable role in ensuring access to higher education via online courses and non-traditional delivery methods. For those who are unable to complete traditional education, OUA's ability to offer a broad range of courses online is an important option in ensuring access to higher education<sup>1</sup>.
- It is important that the Government continues to support online learning as a mode of delivery for higher education from the perspectives of ease of access, flexibility, minimal eligibility, minimal financial commitment, and the availability of income contingent loan support.
- OUA's role as a national, trusted, and impartial service in support of students to access education that is right for them, has seen the organisation open the availability of its marketplace beyond its seven shareholders to include courses from all Australian universities that wish to participate.

### Priority Issues within Key Area

- OUA submits that the Panel should make the key area of access and opportunity its highest priority and develop a national strategy for students from under-represented groups to achieve success.
- A review of the Jobs Ready Graduate legislation and its impact to equity groups (in particular) is endorsed as a priority of the Panel.
- The adequacy of funding for under-represented cohorts and the basis on which it is allocated should be a priority issue for the Panel.
- While it is important to have targets for greater participation by students from under-represented backgrounds, there is little value in setting new targets when existing targets (some set many years ago) have not been met. To set lower targets is to

admit defeat and leave under-represented groups feeling abandoned. To set higher targets risks ignoring the obstacles that clearly already exist. Instead, OUA submits that the Panel should (with the assistance of the Department and the sector) prioritise identifying the factors that have prevented current targets from being met, with a view to recommending policy reforms designed to overcome those factors.

- Duplication of effort across the sector remains an issue. OUA recommends the Panel considers opportunities to deliver greater impact for access and equity groups by coordinating with and leveraging existing organisations and models already utilised across the sector, rather than potentially introducing further fragmentation. Data from organisations such as the National Centre for Student Equity in Higher Education (NCSEHE) and OUA, who span access and equity across the whole sector, will be critical in identifying opportunities to scale impact.
- The issues of access to computers and reliable internet continue to be challenges that equity groups confront in obtaining universal access to quality online higher education. Given how critical flexible online learning is for these students, this matter should be a priority for the Panel.

### 3. Investment and affordability

*An objective of the review is to explore funding and contribution arrangements that deliver equity, access, quality and longer-term investments to meet priorities in teaching, research, workforce and infrastructure.*

*The Panel has been asked to review the Job-ready Graduates Package.*

#### Background

- OUA's open access model allows students, without experience or eligibility, to access higher education that is right for them. It is critical to support successful students beyond their initial enrolment in single subjects, by allowing them to continue their study towards a qualification. For over ten years, OUA has been operating as an agent for universities and supporting the transition of students studying single subjects into CSP places after eligibility criteria have been achieved. However, with constraints on the availability of Commonwealth Grant Scheme (CGS) funding, OUA has observed that it is sometimes difficult for universities to continue offering Commonwealth Supported Places (CSP) to these OUA introduced students.
- With the changes to student contributions made since 2021 (as part of the Jobs-ready Graduates Package), OUA has observed a significant decline (up to 40%) in students commencing study in disciplines where the student contribution increased materially. In some cases, subjects in these disciplines form the core introductory subjects for degrees addressing the more human skills such as effective communication, writing and analysis, highlighted in the World Economic Forum research referenced below. OUA believes that our students' response to price changes has been far greater than that observed in universities on campus, due to our subject-by-subject study mode. OUA is concerned that the unintended consequence of the pricing changes may be deterring prospective students from both starting and continuing their education journey, particularly those from under-represented backgrounds.

### Priority Issues within Key Area

- The establishment of a separate pool of CGS funding for Open Universities Australia to assist students transitioning from studying single subjects into a CSP place should be a priority issue for the Panel.
  - A review of the Jobs Ready Graduate legislation including the consequences of cuts overall to public funding, the embedded inequalities in student contributions and whether the intended outcomes have been delivered, is endorsed as a priority of the Panel.
  - As part of the consideration of Jobs Ready Graduate reforms, OUA recommends the Panel also assess the future requirements in terms of the human skills to adapt and respond to change and uncertainty (not just strong functional skills and knowledge in areas of employment demand). In 2020 the [World Economic Forum](#) published their view of the top 10 skills required to help people succeed in the future. These skills focused on the areas of problem-solving, self-management, working with people, and technology use and development. To best equip Australians now and into the future OUA believe these areas are just as important as functional knowledge in disciplines such as health, science, education, and technology.
  - OUA recommends that the review consider not just pathways for students from under-represented backgrounds to access education initially, but also ensuring that the funding (in particular, the allocation of Commonwealth Supported Places), systems and supporting infrastructure are in place to allow them to continue and complete their studies successfully.
4. The connection between the vocational education and training and higher education systems

*An objective of the review is to explore possible opportunities to support greater engagement and alignment between the vocational education and training (VET) and higher education systems. The Panel has been asked to have regard to the experience of students in navigating these systems and ensuring a cohesive and connected tertiary education system.*

### Background

- OUA's experience in providing access to higher education indicates that prospective learners don't necessarily pre-identify as potential students per sectoral pre-defined categories (such as VET or university), rather as people looking to build skills and knowledge with multiple careers or objectives in mind.
- OUA's enrolment data shows that of prospective students looking to access higher education via OUA, approximately 15-20% have vocational study as their highest level of education attained prior to starting. However, the ability to utilise these qualifications as an entry to university study can be difficult outside OUA's open access model, requiring navigation of a complex system for recognition of prior learning that is often different at each institution.
- VET qualifications and higher education qualifications are already aligned and integrated under the Australian Qualifications Framework (AQF). Several dual sector

providers in Victoria (including RMIT, Swinburne and Victoria University, all of which participate on the OUA Marketplace) currently engage in both systems. OUA could expand the scope of its marketplace to include VET qualifications to further build connection between the VET and higher education systems.

Priority Issues within Key Area

- More effective articulation and course credit arrangements between higher education and VET is considered a priority issue for the Panel.
- Transparent and comparable information to help students identify and access courses that are right for them is considered a priority issue for the Panel. OUA supports the investment required to evolve a digital marketplace at scale to serve all post-secondary lifelong learning. This will also unlock opportunities for industry engagement and collaboration.

Thank you for the opportunity to provide Open Universities Australia's priority issues within the key areas outlined in the Terms of Reference of the Review. We look forward to contributing further as part of the ongoing consultation process, and should you have any queries or like to discuss in the interim, please don't hesitate to contact us.

Yours sincerely



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