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SUBMISSION TO THE UNIVERSITIES ACCORD PANEL

19 December 2022

Thank you for this opportunity to make a submission to the Australian Universities Accord Panel.

Many peak bodies, groups, colleagues and other stakeholders will no doubt make excellent submissions on detailed aspects of the current deficiencies in funding arrangements under the Job-ready Graduates Package and how they should be modified. Many also will direct specific attention to ToR 7 on research matters, noting also the concurrent independent review by Professor Margaret Sheil of the Australian Research Council review.

In this submission, I direct attention to matters of particular relevance to student equity in higher education (HE), the student experience, assurance of the continuing quality of Australian HE and mechanisms available to achieve greater parity of status and esteem between vocational education and training (VET) and HE. I will endeavour to focus on issues that will perhaps not be canvassed in other submissions.

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

Particular ways in which this critical agenda might be met must pay attention to increasing *both* national productivity *and* national fairness for all Australians.

There are particular aspects to pursuing this agenda with coherence and national intent, which include the following.

- **Recommend: A Policy Vision for Student Equity**
  In 2018, the National Centre for Student Equity in HE (NCSEHE) developed a **long-term strategic vision for student equity in Australian tertiary education** via an extensive national collaborative process. That vision for *Student Equity 2030* – The Best Chance for All – built on the Commonwealth's *A Fair Chance for All* (1990) and the Bradley Review (2008) and proposed a national policy statement for student equity in Australian tertiary education. That vision advocates that:

  > Advancing Australia's future depends on all its people, whoever and wherever they are, being enabled to successfully engage in beneficial and lifelong learning.
  > *Contributing to*: A fair, democratic, prosperous, and enterprising nation; reconciliation with Indigenous Australia; and cultural, civic and intellectual life.
  > *Achieved by*: An inclusively designed system with multiple entry and exit points; proactive removal of barriers to participation; and tailored support where needed.
  > *Accountable through*: An integrated approach to measuring success at institutional and national levels to align performance with policy objectives.

  This broad equity roadmap holds even more true today in the context of the global pandemic (Kift, Zacharias, & Brett, 2021, The Best Chance For All: A Policy Roadmap for Post-Pandemic Panic | Student Success (studentsuccessjournal.org)) and national knowledge and skills needs. Assuring equitable access, participation and attainment for *all* students, especially those identified as belonging to one or more of the current six equity groups (identified in 1990 and only slightly modified since) is integral to the delivery of a functioning and inclusive education ecosystem. Over COVID-19, the disadvantage experienced by those on the margins of HE has

been exacerbated by the effects of technological disruption to economic and social systems over COVID-19.

- **Recommend: Development of a National Lifelong Learning Strategy**
Along with *The Best Chance for All*, numerous reports from think tanks (e.g., the McKell Institute (2019)), business groups (e.g., Business Council of Australia (2017)) and others (e.g., the *Statement of Common Interests Between the ACTU, Ai Group, ACCI and BCA On Skills & Training* (2022)) have echoed international calls for the development of a **national Lifelong Learning Strategy** to bring coherence to the disparate and fragmented agendas currently being progressed. The articulation of a national lifelong learning strategy across and between education sectors can inform and coalesce national action across secondary and tertiary (HE & VET) for initial entry-level qualification and then for ongoing up- and re-skilling. The role of both entry-level industry credentials and other micro-credentials could be captured and the enablers of equitable access to quality career advising across the lifespan and a national skills taxonomy could be identified. In a similar vein, the Monash Commission (2018) recommended the introduction of a universal learning entitlement and a lifetime learning account, further lifelong learning enablers. The development of a national strategy aligns with international action in this regard (e.g., the Scottish Funding Council's current *Review of Coherent Provision and Sustainability*). UNESCO also has a Collection of Lifelong Learning Policies and Strategies | UIL (unesco.org) available for reference.

- **Recommend: Full implementation of the Australian Qualifications Framework (AQF) Review**
The **Noonan Review (2019) of the Australian Qualifications Framework (AQF)** is a critical piece of policy infrastructure that should be implemented *in full* to underpin and activate a connected secondary to tertiary education and training system that accords equal status to VET and HE qualifications and places the learner-earner at the centre of jobs and skills attainment and social participation. In particular, only by implementing the Noonan Review in full will it be possible to **ensure that skills are accorded equal status to knowledge in qualification design**. As set out in the Report of the Noonan Review's Expert Panel, the current AQF is deeply flawed, out-of-date and riddled with inconsistencies and gaps (e.g., digital literacy is not mentioned in the current AQF). Well-functioning qualification frameworks 'establish a basis for improving the quality, accessibility, linkages and public or labour market recognition of qualifications within a country and internationally' as a 'bridge to lifelong learning' (OECD, 2007, p 22).

2. Access and opportunity

As Minister Clare has noted on a number of occasions in 2022, as a sector we have not got close to reaching the Bradley target for widening participation, despite the demand-driven system (2012-2017) and the welcome injection of funds into the Higher Education Participation and Partnership Program (HEPPP) since the Bradley Report.

We cannot lose faith with the HEPPP investment and it should continue, with more robust evaluation and impact measurements as have now been proposed. However, more still is needed. Refreshed approaches are required and the unequal distribution of equity students by both institution/ institution type and field of education needs to be addressed and better, more nuanced data should be collected. It seems that there is a role for the national regulator, TEQSA, in this regard also.

- **Recommend: Ensure growth of the total number of equity group students, and across all fields of education, by growing the whole student equity pie (i.e., by assuring that growth in one institutional grouping does not occur at the expense of growth in the rest of the section).**

Any focus on incentivising growth in access, participation and attainment from equity groups mut be one that delivers *whole-of-sector uplift and grows the total number of students*, not just uplift for one group of universities who might be better positioned to offer attractive scholarships to students to entice them from the regions and then not return. New initiatives need to ensure that the sector 'grows the pie' and improves equity outcomes for students who had already been encouraged to apply for university in other dedicated outreach efforts. Some relevant points here include:

- In 2019, the Grattan Institute found that regional students were increasingly moving to the city to study: "Fewer than a third of regional students commencing university in 2005 made the move to a city. By 2010, that number had risen to half, and by 2015 it was 57 per cent". The higher the ATAR the more likely a move to the city and regional students who moved were unlikely to return.

- In 2017, a NCSEHE funded equity Fellowship (Southgate, 2017) found that ''…students from equity groups are far more likely to be enrolled in a high-status degrees in less elite universities … these students make up a remarkably small percentage of their field of education cohort in Go8 universities in particular. From an equity perspective, such patterns of unequal distribution require concerted attention."

- Further, recent 2022 research funded by the NCSEHE **Equity off course: Mapping equity access across courses and institutions** has confirmed that student equity is stratified in HE by *both* institution and field of education; specifically, there were substantial access gaps between equity and non-equity groups; and LSES, regional and remote and Indigenous students were underrepresented at (selective) Group of Eight universities.

- The Times Higher Education reported in September 2022, that "The most recent Education Department statistics show that the 10 public universities based outside the capital cities have 41 per cent of regional enrolments, 38 per cent of Indigenous enrolments and 28 per cent of socio-economically disadvantaged enrolments despite housing just 18 per cent of domestic students".

- **Recommend: Better, more nuanced national data collection and reconsideration of the six 1990 equity groups. For those equity groups which are languishing and/or have gone backwards, consider reintroducing the demand driven system, with associated adequate funding to support student success.**
  Around 50% of university students today are first-in-their family to attend university (though first-in-family is not a recognised equity group). Around 50% of all domestic undergraduate students belong to at least one recognised equity group; though many belong to two or more groups. Outside the current six, longstanding equity groups, which are focussed on domestic (not international), undergraduate (not postgraduate) and university (not private) educated students, a number of other groups who experience disadvantaging factors exist, but are not formally recognised. This was remarked upon recently by the Productivity Commission (2022, 103). These students include, for example, students who: are first-in-family (as above); are from a refugee or migrant background; have been in care; are parents and carers; who are mature age; veterans; LGBTQIA+; international; study fully online; study part-time; have an ATAR <70; equity students undertake postgraduate student. Data is not uniformly collected as regards these students to enable tracking over time.

  It is also the case that not all equity groups are equally disadvantaged across all four student life stages (i.e., pre-access, access, participation, and attainment and transition out). Recent work by ISSR (2020) investigating the effects of cumulative disadvantage has found that certain disadvantaging factors (DFs) have worse effect on some HE outcomes than others and that the cumulation of DFs worsens outcomes: for example, the probability of graduate employment

within six months is 84% with no DFs; 79% with one DF; and 70% with ≥ two DFs. Different combinations of DFs associated with poorer outcomes across student life stages.

As mentioned (above) as regards **equity group data by field of education** and next as regards **non-participating enrolments**, better national and institutional data collection on these and a range of aspects would facilitate more effective evidence-based action on these issues.

For the equity groups where access, participation and attainment are flatlining or going backwards (e.g, as per the national data on the NCSEHE website), the **reintroduction of Demand Driven Funding (DDF)** for those students should be considered, for example, for: LSES students; Aboriginal and Torres Strait Islander students; Regional and Remote students; and students from non-English speaking backgrounds (including migrants and refugee students).

- **Recommend: Attend to the inequities of the Job-ready Graduates Package and inequitable schooling system**
  - The Job-ready Graduates Package (JRGP) Increased the cost of degrees that equity students often take and *may* affect choice. The average increase in fees amounted to 15% for Indigenous students and 10% for women.
  - Research suggests that that equity students (and their parents, communities and influencers for younger students) are risk adverse as regards debt and JRGP may impact on course and career decisions, including whether to attend university or not. It is noted that Honours student Mr Max Yong recently found that JRGP UG price incentives had little effect.
  - JRGP reduced the total amount of dollars funded per student overall; with a fourfold difference now existing between clusters, further complicating career and course decision making.
  - The Productivity Comm (2022) found that the JRGP subsidies are 'ineffective & inequitable'.
  - The JRGP 50% subject pass rule for first year students has equity ramifications as equity group students may initially fail as they 'learn how to learn' and seek to adapt to the new expectations and environments of HE learning, while carrying a concurrent heavy life load. This rule has also surfaced the big sector issue, on which no data is currently collected and as regards which there is little understanding, of 'non-participating enrolments' (NPEs) (aka 'ghost Ss'). A recent NCSEHE report (2021) found that "A quarter of university fail grades represent 'ghost students', who remain enrolled in undergraduate units but show no evidence of participation...".
  - Public funding of universities is now at around ~52%. The Commonwealth will soon spend 50% more on private schools than on HE.
  - The previous dot point raises the further issue, not strictly within the ToR for this review, but which impacts critically on the efficacy of equity students' access, participation and attainment in HE. That is that the current public school system is inequitably funded and that a student's performance is strongly tied to their SES and postcode. The Productivity Commission's 2022 Review of the National School Reform Agreement - Interim report found that Australia has "persistently fall[en] short" (2022, 14) when it comes to providing a high quality and equitable education for all students. Commentary on the report observed that: "Public schools do the heavy lifting in our education system. They enrol 80% or more of disadvantaged students – low SES (80%), Indigenous (84%), extensive disability (86%), and remote area students (82%). Also, over 90% of the most disadvantaged schools are public schools." The pipeline into HE will not be fixed until schooling quality and equity is attended to in public education.

- **Recommend: Greater funding for Enabling education**
  Access by equity group students to free [Enabling education](#) is one of the [most effective mechanisms](#) for growing the HE pool of equity students and to assure their skills and preparedness for HE success. Unfortunately, Enabling education is not well understood in the sector and recent policy changes have seen a one-way transfer of places away from Enabling, which are not able to be returned once shifted.

  The National Association of Enabling Educators of Australia (NAEEA) has developed [Course Learning Outcomes](#) for Enabling courses and consideration should be given to adding Enabling to the AQF. Any national strategy for access and success for equity students should look to funding a larger number of Enabling places as a proven pathway to HE, which would also have benefit in assuring the development of Foundation skills and the acquisition of career development learning for lifelong career management.

- **Recommend: Fund teaching and support for equity group students appropriately to enable success**
  HEPPP funding has been valuable and focused attention on the four student life stages across which funded activities for HEPPP-eligible students (e.g., by way of information and experiences, skills, resources and institutional development) can improve student equity outcomes.

  However, it is unfortunately not the case that HEPPP is able to fully fund quality learning and teaching and the provision of necessary services and support for equity group students. [Recent research](#) that has determined that the cost of teaching an **undergraduate** student from a low SES (LSES) background is **six times higher** than for more advantaged students and the cost of teaching a **postgraduate** student from a LSES background is **four times more**. If the demand driven system is reintroduced for any equity groups (and probably even if it is not), full funding for teaching and learning should be allocated to ensure equity group students are properly supported for success

- **Recommend: Assure quality Careers Advising prior to, on entry and through to HE for all equity-bearing students.**
  Almost every review conducted across the unconnected educational sectors, from secondary to tertiary, across VET and skills, and including the Napthine Review for a National Regional Rural and Remote Education Strategy, emphasises the importance of early access to quality careers advising to support lifelong learning. This enabler is particularly important for equity group students, with interventions as early as in primary school, to ensure that they are not streamed out of HE and particular courses by virtue of subject choices made. In 2017, the [Higher Education Standards Panel](#) (HESP) recommended that students should be supported "to make the right choices" (Recommendations 2-4), in particular focusing on the requirement that institutions should do more to enhance the provision of career education services, especially on entry to HE (2017, Recommendation 3) and that there was a "lack of university outreach programs for the non-school cohort" (2017, 18). HESP Recommendations 2 and 3 were as follows:

  > **Supporting students to make the right choices**
  > 2. School students and mature-age people need better access to effective career advice. The National Career Education Strategy, due to be released in 2018, should be closely monitored to identify improvements in the area of student career advice, including study options and pathways, and information about the post school learning environment. **This strategy should also be expanded to include mature-age students or a separate strategy should be initiated for this cohort.** [Emphasis added]

3. Career advice cannot be left to schools. Every higher education institution should ensure that their students are given the opportunity for career planning and course advice **on entry to the institution and as they require it throughout their studies**. [Emphasis added]

A different but related aspect of this is that there are **a number of equity group students who are falling through the gaps on careers and employability advice, planning and preparation at various stages of their university studies and across the student life stages**. More work could and should be done to safeguard careers and employment advising and outcomes, including employability outcomes, for equity group students generally over the student life stages and specifically for distinct cohorts. Recent advice in this regard has been provided in a 2022 NCSEHE Report – *Best-practice career education for students from low socioeconomic status backgrounds*.

Particular issues that highlight the extent of the issues and have presented for dedicated attention most recently include the following:

- A 2019 Universities Australia Work Integrated Learning (WIL) Audit found **significantly lower rates of access to in-person WIL** for students who are regional and remote, LSES and Medium SES and Indigenous. Reasons for this included: time pressures, financial constraints, geographic location and caring commitments.

- Dollinger et al (2022) recorded a substantial concerns regarding the equity and accessibility of WIL placements for **students with disability**. Suggestions to deal with challenges, barriers and discriminatory practices included: staff training to normalise disability and ensure 'invisible' disabilities are treated with equal consideration; working with students with disability to ensure better university and industry support for inclusive and equitable WIL practices & policies; better matching of students with disability to placements; and working proactively to ensure that industry provides appropriate accommodations up front.

- A 2022 NCSEHE Report found that few universities offered tailored career development and WIL for the growing number of **Culturally and Linguistically Diverse, Migrant and Refugee (CALDM/R)** students. These students only had access to generic support and/or some international student support

- Another 2022 NCSEHE Report – *Supporting Careers of LGBTQIA+ Students in Australian Universities* – found that the estimated ~60,000 domestic LGBTQIA+ university students face additional challenges in career development and needed specific, tailored career guidance and support.

- **Students with disability**, the fastest growing equity cohort in universities, are particularly disadvantaged when they seek to secure equitable employment outcomes: they are employed at a consistently lower rate and are more likely to be in jobs that do not use their skills and knowledge developed at university. A 2022 NCSEHE Report – *Meaningful jobs for students with disability: From luck to business as usual* – found that, "despite recent progress, only 24 of Australia's 43 universities (55.8 per cent of all institutions) provided on-campus, targeted careers support for students with disability." Amongst other matters, it was recommended that the sector work with other peak bodies and groups to develop a "national [students with disability] careers strategy to guide specialist services in the context of broader service delivery". It is noted that the National Careers Institute has funded the development of a national Career Development Learning (CDL) Hub for students with disability, which is investigating best practice career support for those students. The project is due for completion in February 2023 and will "include an accessible range of freely available resources and practical examples of programs that address careers for students with disability across stages of the student experience" (NCSEHE, webpage).

Looking beyond graduation at long-term socioeconomic outcomes for equity students based on an examination of census and HILDA data, a 2019 NCSEHE Report found discrepancies again as between equity and non-equity graduates, especially for LSES, non-English speaking background (NESB) and Indigenous grads, and also for graduates with disability. It was concluded that disadvantage was not easily alleviated by degree completion alone. In instances where the trajectories of equity and non-equity graduates did move in similar directions and at a comparable pace, there was still a period of seven-to-eight years before trajectories converged, leaving the researchers questioning how to prevent this seven-to-eight year catch-up period and provide an equal start to all grads.

3. **Investment and affordability**
The matters raised under ToR 2 as regards the inequities of the JRGP are cross-referenced here.

4. **Governance, accountability and community**
The national HE regulator, TEQSA, operating under the *TEQSA Act* and regulating against the *Higher Education Standards Framework* (HESF), does good work in protecting and promoting the interests of HE students and the reputation of the HE sector. It provides the sector with guidance and furnishes resources. TEQSA is very consultative in its approach.

- **Recommend: Consider TEQSA's regulatory role in supporting student equity**.
It would be useful to consider how TEQSA might support government action on increasing equity groups' access, participation and attainment in HE.

The *Higher Education Support Act (HESA) 2003* sets out in Section 2-1(a) that the objects of the Act are, inter alia, "to support a higher education system that: (i) is characterised by quality, diversity and equity of access". There are provisions under the HESF (e.g., 2.2 Diversity and Equity) and *National Code* that are of relevance also. The HESP and TEQSA have had a dedicated focus on and progressed enhancements for admissions transparency.

While TEQSA has Guidance Notes on 'Diversity and Equity' and on 'Monitoring and Analysis of Student Performance', it has recently recorded in its *TEQSA Compliance Report 2021* (2022, 19) that

> While most providers adequately monitor student performance, we have observed some instances where there is lack of early identification and engagement with students at risk of unsatisfactory progress, and lack of or inadequate support to meet the needs of students.
>
> Many students at risk of not progressing, who do not receive early support, are at higher risk of experiencing disconnection from learning. This has led to some students discontinuing their studies

TEQSA's capacity and capability to monitor the provision and adequacy of student support of critical importance to equity students, a matter of particular concern over COVID as teaching and support moved online, is not clear. More broadly, the current HE system is under stress as providers grapple with how students and staff engage flexibly in and with quality educational provision in a post-pandemic era. In addition to issues of wage theft as regards sessional staff, other matters of concern that have arisen over the COVID period and impact the quality of educational provision include, that:
- tertiary education topped national job losses (at 39%);
- there has been a substantial loss of equity-focused staff;
- educational disadvantage was severely exacerbated (e.g., for digital poverty);

o   mental health & wellbeing issues for both students and staff, already of concern pre-pandemic, have increased considerably.

Finally, it is noted that TEQSA has no current role in monitoring expenditure of HEPPP funding nor in evaluating the efficacy and impact of HEPPP expenditure. TEQSA does not publish equity data nor monitor "diversity and equity of access" under the *HESA* 2003. Perhaps this is not a role for TEQSA, and should continue to be a role for the Department, but it is arguably a matter of regulatory interest, especially in the current environment and with government focus.

- **Recommend: Pay greater attention to monitoring and supporting student and staff mental health and wellbeing.**
  As regards **mental health**, it is also noted that the HESF requires that adequate support for student mental health and wellbeing be provided (HESF *Wellbeing and Safety: Standard 2.3.3*). Also, the provider's governing body must 'develop and maintain an institutional environment in which …the wellbeing of students *and staff* is fostered' (HESF *Corporate Governance: Standard 6.1.4*, emphasis added). The extent of regulatory oversight of these specific matters is unclear, though TEQSA has identified 'wellbeing and safety of students' (with no specific inclusion of staff) as one of its 'compliance priorities for 2022'. Australia is falling behind international best practice on student and staff mental health and wellbeing and this needs to be addressed.

5.	The connection between the vocational education and training and higher education systems

- **Recommend**: **Full implementation of the Australian Qualifications Framework (AQF) Review**
  As referred to under ToR 1 above, the Noonan Review (2019) of the AQF is a crucial enabler for enhancing connections between VET and HE. The AQF Review also made recommendations for emphasising pathways for the Senior Secondary Certificate of Education (SSCE) with better credit recognition, which would facilitate the move to learner profiles already occuring across multiple states and territories. Learner profiles are intended to more fully demonstrate and articulate students' attainment and showcase their individual strengths to employers, educators, selectors and recruiters. The implementation of the Noonan AQF Review in full will provide the policy infrastructure for parity of esteem and status between HE & VET and modernise qualification design that can focus equally on skills attainment (as it now does for knowledge), to enable lifelong learning and to enable equity and widening participation and attainment.

6.	Quality and sustainability

- **Recommend: Reinstate funding for a body dedicated to tertiary learning and teaching enhancement**

A competitive and resilient domestic and international education sector needs to be at the forefront, not only of qualification design and delivery, but also of pedagogical trends, teaching excellence and educational enhancement. It is imperative that funding for HE research and development and learning and teaching enhancement, along the lines of the previous Office for Learning & Teaching and the Australian Learning & Teaching Council be reinstated. Every nation has something like this and the disbandment of the Australian equivalent in 2016 (see https://studentsuccessjournal.org/article/view/584) has diminished the quality of Australian HE at the very time when we need it most, due to impact of COVID on online/ blended/ hybrid learning, to meet Australia's social and economic needs for a highly educated and skilled population, to support equity students and to make the curricular connections between the VET and HE systems.

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19 December 2022