Dear Universities Accord Panel

Thank you for the opportunity to provide a response to your submission paper.

Curtin is a young, technology-based University which is known for its culture of innovation. Our focus is on making a difference, with a strong emphasis on the student experience, research that has impact and partnerships with both business and community. We have aligned our strategy with the wise words of our namesake, John Curtin.

*“The great University should find its heroes in the present; its hope in the future; it should look ever forward; for it, the past should be but a preparation for the greater days to be.”*

*John Curtin, The West Australian, 16 April 1932*

Our submission to the Universities Accord process is grounded by John Curtin’s words. As a nation we have an opportunity to look ever forward to innovate our higher education sector together.

Curtin has contributed to and is supportive of the submissions you will have received from both Universities Australia and the Australian Technology Network. As such, in our specific response to your discussion paper we have not repeated information from those additional submissions. Instead, we have identified seven “big ideas” for your consideration. We have kept our response deliberately concise, knowing that you will be inundated with numerous and lengthy submissions. If any of these big ideas capture your imagination, we would be delighted to provide additional information or to discuss them with you.

We look forward to engaging with you further as part of the Accord process.

Best wishes

Professor Harlene Hayne

**Vice-Chancellor, Curtin University**

**Attachments:**

Big Idea A – Federally Regulated System – Removal of the State regulatory burden (Qstns: 19 and 36)

Big Idea B – Industrial Academics (Qstns: 26 and 27)

Big Idea C – Australian Entrepreneurial University Framework (Qstns: 26 and 27)

Big Idea D – Building the brand Australia – Higher Education as a key export (Qstns: 43 and 36)

Big Idea E – Access for all – mechanisms to build equity participation & success (Qstns: 28, 29, 30, 31, 32)

Big Idea F – An Australian First Nations University (Qstns: 28 and 30)

Big Idea G – Innovating our assessment practices for academic integrity (Qstns: 42)

**Big Idea A – Federally Regulated System – Removal of the State regulatory burden**

(Links to Questions: 19 and 36)

The regulatory and reporting landscape for higher education is crowded and complicated. Providers are subject to regulatory requirements including those stemming from the Higher Education Support Act 2003 (HESA), the Tertiary Education Quality and Standards Agency (TEQSA) and Higher Education Standards Framework (Threshold Standards) and the Australian Qualifications Framework (AQF). Providers that teach international students must comply with a range of specific regulations, including the Education Services for Overseas Students Act 2000 (ESOS Act). Providers operating in the VET system are subject to a different set of regulations overseen by the Australian Skills Quality Authority (ASQA) or state-based regulators in Victoria and Western Australia. Finally, providers like Curtin University that host campuses overseas are also regulated and monitored by local legislation and standards.

Higher education providers are set up under a range of legal structures, depending on their status as for-profit and not-for-profit corporate entities. Universities are established under individual Acts of Parliament in the respective state or territory or, in the case of the Australian National University, the Commonwealth. Each jurisdiction has separate, but not dissimilar, approaches to governance in these Acts, as well as requirements for financial, risk, probity, information and research ethics regulation and reporting.

Most institutions have a governing body (a board, senate or council) with responsibility for strategic planning and oversight of management including in academic governance (education and research), planning, financial, legal and risk management matters.

The Panel has heard concerns from stakeholders about the make-up of these governing bodies, including whether they hold sufficient sector expertise; at Curtin, we are fortunate to have a Council replete with governance experience but we recognise that this is not always the case. For some universities established under state or territory acts, some members are directly appointed by the relevant government. It is also common for governing bodies to include representatives from staff, student bodies and alumni.

It was suggested to the Panel that a more specialised and coherent national approach to administering Australia’s higher education system might be needed. Given the intersection between the Commonwealth and states and territories for regulatory requirements, and the overlapping responsibilities for and delivery of higher-level skills and vocational programs, research and infrastructure, there may be scope for a more effective federation-wide approach.

It is common place for students to travel between states and territories to pursue higher education, sometimes mid-course, and also for employment opportunities, which would be much better served by greater uniformity in course structure and accreditation requirements.

One specific area in need of regulatory improvement is the health sector. Most health sciences courses are externally accredited by the professions and many of the professions also regulated by AHPRA. Reporting requirements for external accreditation, professional regulation and HE regulatory requirements place an extraordinary level of resource burden on universities. Multiple reporting of the same or similar information in varying formats increases the administrative burden. An alignment of reporting requirements that service the requirements of agencies would appear to be a logical response to this over reporting.

As one concrete example, accrediting bodies, for the most part, mandate a minimum number of hours required in field/clinical placement as evidence of achievement of the standards, however their actual narrative for meeting the required standards is one of competence not hours. This ambiguity should be removed, and a clearly articulated competence framework adopted that includes simulation activities, fieldwork and clinical activities as formative and summative evidence of competence.

**Big Idea B – Industrial Academics**

(Links to Questions: 26 and 27)

Australian universities current support three basic forms of academic. These are variously named but with very similar functions, viz., Teaching and Research Academics (T&R), Teaching Focussed Academics (TF) and Research Focussed Academics (RF). There is an increasing move towards more industry interactions with universities. To date, this has mostly been in the form of research interactions.

In the Higher Degree by Research space there is an increasing appreciation of the value of embedding students in industry and of industry involvement in project work. There is also the new government financial incentive for formal internships. One challenge with this approach is that the incentives for academic supervisors are not ideal because industry-facing Research Higher Degrees tend to produce outputs that do not contribute to traditional measures of academic esteem (i.e., high-impact journal publications). As such, there is little incentive for traditional academics to participate in industry research and even less for them to take on the challenge of ensuring company adoption of the outputs they produce through research.

We propose that specialist academics are required, who have the appropriate skills, incentives, recognition and reward pathways to overcome the Higher Degree Research and industry project adoption/translation challenges. We refer to these specialist academics as Research Industrial Academics (RI).

Industry involvement in undergraduate teaching has focussed on scholarship support and varying modes of Work Integrated Learning (WIL). WIL is integral to many programmes. Currently, not all students can take advantage of WIL due to limited opportunities. There is evidence that WIL equips students with skills and competencies that are in demand by employers. By necessity, ~80% of Curtin students have gainful employment, which may or may not relate to their programme of study, to finance their studies. Students from equity backgrounds have to work to a greater extent. We suggest there is an opportunity to flip this paradigm and propose the concept of Learning Integrated into Work (LIW). LIW would allow students who are employed to reach into universities to gain an education and the qualifications they need for career progression whilst working. Students could finance their studies more effectively, learn on the job and contributing to the workforce, helping to address skill shortages. In addition, previous workforce experience could be credited to their university programme shortening programme duration. To make LIW a success will require a new quality of partnering between universities and industry. This cannot happen organically but needs to be a design and development process.

We propose that specialised academics are required with new capabilities at the university/industry interfaces – we term these people Teaching Industrial Academics (TI). New expectations, rewards and recognition criteria and procedures will be needed for success.

**Big Ideas C – Australian Entrepreneurial University Framework**

(Links to Questions: 26 and 27)

For a more sustainable future, the Australian economy needs to diversify from its strong reliance on the resource sector. Many have proposed that we should move towards a greater reliance on manufacturing. In our view, this single new focus overlooks the potential contribution of a shift towards a far more entrepreneurial economy.

Developing an **Australian Entrepreneurial University Framework** and diversifying Australian universities into entrepreneurial institutions provides us with an opportunity to develop Australia into a country where global talent can start and innovative new ventures, at scale.

International Education (IE) can contribute to Australia’s economy and regional and global development by co-creating an entrepreneurship ecosystem. Using this framework, international students who come to Australia will not only receive an education and get a job but they would also create new ventures to stimulate the economy and create jobs. The contribution of IE to Australia is currently about $40.3 billion (2019 pre-COVID); IE would make further sustainable contributions via entrepreneurship development.

The vehicle for creation of Australia’s entrepreneurship ecosystem is to place universities in the centre and enhance multistakeholder development. We currently have individual “dots” (e.g., research commercialization, entrepreneurship courses, incubators, etc.); what we need is an entrepreneurship ecosystem that links these dots together.

**Benefits:**

* Global talent will be attracted to Australia not only for education and job seeking, but also to create innovative new ventures to contribute to our economy in the long term.
* Australia will become a much more attractive destination for top global talent as the environment allows them to create new ventures and start-ups.
* The benefits of the IE sector to be shared broadly across the system and sectors.
* There will be a positive impact on Australian universities in terms of our educational products, innovation, research commercialization, and engagement with various communities.
* It fundamentally changes the role of higher education in our economy, allowing universities to fully realise their synergies to contribute to our economy and society.
* It will stimulate growth in the international student market and increase the quality of talent we attract to Australia.

**Success cases to learn from:**

* 2012-2022 OECD and European Union Entrepreneurial University Framework Development
* Universities in the Silicon Valley Entrepreneurship Ecosystem
* Start-up Chile
* FINEST Bay: Finland-Estonia Entrepreneurship Ecosystem

Government can be the catalyst for change by providing policy support that creates an Australian entrepreneurship ecosystem including policies to engage and stimulate multistakeholder development and by placing universities in the centre to drive the change. Policy support can enable the launching of the development of the Australian Entrepreneurial Universities Framework. An “Australian Entrepreneurship Visa Stream” would attract global talent to Australia to start new ventures and create start-ups.

Funding could be developed to allow universities to systematically introduce capabilities themselves (products, research, student recruitment, engagement, etc.). We could link the Australian entrepreneurship universities ecosystem to other ecosystems overseas through entrepreneurship Diplomacy. The first step is to establish an “Australian Entrepreneurial University Framework” Task Force to stimulate nation-wide change.

**Big Idea D – Building Brand Australia**

(Links to Questions: 43 and 36)

The global higher education market is highly competitive and is forecast to grow for the foreseeable future. ABS data on international trade showed that Australian education exports reached $40.3 billion in 2019 (4th largest export pre-COVID), and international student numbers have recovered to pre-pandemic levels in 2023. Education as an export provides a significant contribution to Australia, not just through student fees but also through the multiplier effect that international students bring to the labour market and the economy, but the benefits are much broader than simple economic value.

International students enrich our own culture while providing strong foreign connections through the millions of international Alumni who have returned to their home and other countries. Their Australian experience sees them return to their home country inspired by Australia’s rich culture, history, and ambition. A connection is formed that lasts a lifetime.

Our global connections with foreign industry and Government provides opportunities for research, commercialisation and education partnerships to be successfully formed.

Developing the Australian higher education sector as a strong and globally competitive higher education sector for education, research and partnership will provide both economic as well as social and political benefits.

State-led campaigns create confusion and unnecessary internal competition in an already congested and heavily contested international student marketing environment. A nationally coordinated approach would lift and amplify the Australian proposition for international students in the market place.

Curtin is proposing that the Accord process:

* Develop a coordinated approach across all State Governments to promote brand Australia.
* Build strong government-to-government agreements for education and research collaborations.
* Ensure our immigration policies and processing does not present barriers to potential students, but rather enables our competitive position.

**Big Idea E – Access for all – mechanisms to build equity participation and success**

(Links to Questions: 28, 29, 30, 31, and 32)

In 2022 a OECD report noted that “*even in occupations where formal qualifications are not mandatory, employers tend to perceive formal qualifications as the most important signals of the type of knowledge and skills that potential employees have acquired” (*[Education at a Glance - OECD](https://www.oecd.org/education/education-at-a-glance/)).

Higher education should not be something that is only accessible to those who can afford it, those who had the privilege of a quality high school education or those who live near a university. The sector needs to ensure that no one experiences unnecessary and unfair barriers to further education and support to achieve their version of success. Broader access to higher education is a key social and economic driver for a fair and equitable labour market participation, a prosperous economy and thriving communities.

Curtin is proposing that we need to:

* Fund Universities based on Head Count rather than EFTSL for equity students[[1]](#footnote-1). Many equity students study part time but the resource required to support them does not become less with a reduced EFTSL load and should be provided at an individual (Head Count) level
* Increase resourcing for aspiration, awareness, and academic skills development programs to build ambition and break down the barriers (both real and perceived) to higher education access for all equity groups. In particular, properly fund this critical work in rural, regional and remote communities where distance and small populations prevail.
* Support equity students through a living allowance scheme, which could form part of the HECS program, and increase financial support for students moving from rural, regional and remote communities to study (travel and housing)
* Fund equity student places under a “demand driven” system to allow growth in participation of this group. Curtin acknowledges the current temporary funding for equity students through the 20,000 equity places. We are however suggesting this could be simplified through a demand driven approach for equity groups.
* As many equity students enter University through non-traditional pathways, it is important that we ensure that the critical role of enabling pathways is formally recognised through legislation and resourced appropriately.
* Apply regional loading at the individual student level for all students studying in their communities and at regional campuses; and remove the requirement to meet a minimum enrolment threshold at a regional campus. This would recognise the additional costs associated with supporting all students studying in regional communities, ensuring universities are funded to value-add to the online learning experience, as well as maintain regional campuses. There are many communities, particularly in WA which do not have a Regional University Centre to offer support.
* Increase funds available through the Regional Partnerships Project Pool Program (RPPPP) beyond the current $7.1m national program to enable more collaborative projects to occur between Universities and Regional University Centres.
* Significantly increase the Disability Support Fund which at $7,841,730 (net of ADCET allocation) represents a per head amount of $93.70 per student with disability across the sector (2019 data).

**Big Idea F – An Australian First Nations University**

(Links to Questions: 28 and 30)

Aboriginal and First Nations participation and success levels in higher education need to be strengthened further.

A significant number of Australian universities have at least a centre or faculty focus on Indigenous aspects of culture, learning, research and support, but this is a disparate approach, limited by individual university resourcing. One potential addition to the various programs and support mechanisms that exist and are being developed could be the establishment of of a First Nations University.

This new university would be governed in a manner decided by Aboriginal and a Torres Strait Islander leaders in consultation with TEQSA (it should meet the definition of an Australian University). However, it would not be exclusive of others and, indeed, may be much stronger if inclusive of a range of nations, including other Australians. Perhaps an upper limit of 60% of any nation in terms of students, staff and leadership as three separate cohorts, would set a principle from the outset for avoiding excessive segregation.

This would provide a critical mass of First Nations academics in the one institution that would be of sufficient size to develop a First Nations-led governance and teaching and research model for Higher Education, that can be linked to satellite campuses across Australia.

Both New Zealand and Canada provide us with examples of First Nations universities.

**In New Zealand the Te Wānanga o Raukawa** is a *“tikanga Māori tertiary education provider based in Ōtaki, Aotearoa, New Zealand. Hailed at the time as the 'smallest university in the world' Te Wānanga o Raukawa was established by the Raukawa Marae Trustees in 1981 with only two students.*

*A special and unique place of learning, Te Wānanga o Raukawa has become recognised over the last 30 years as an opportunity for all to learn within a tikanga Māori community under the principles of the iwi development strategy, Whakatupuranga Rua Mano: Generation 2000.*

*Whakatupuranga Rua Mano captured the health and wellbeing aspirations of the ART Confederation of Ngāti Toa Rangatira, Te Āti Awa ki Whakarongotai and Ngāti Raukawa ki te tonga in the lower North Island of Aotearoa. These are the founding iwi of Te Wānanga o Raukawa.”* [Te Wānanga o Raukawa (wananga.com)](https://www.wananga.com/).

**In Canada the First Nations University of Canada** provides us with a further example. “*First Nations University of Canada seeks to have an ongoing transformative impact through education based on a foundation of Indigenous Knowledge. The Regina campus is situated on the atim kâ-mihkosit (Red Dog) Urban Reserve, Star Blanket Cree Nation and Treaty 4 Territory. Star Blanket is the first First Nation in Canada to create an urban reserve specifically dedicated to the advancement of education.”*  [About Us - FNUniv.ca](https://www.fnuniv.ca/about-us/)

Curtin is proposing that could the Accord process:

* Explore the development of an Australian First Nations University.

**Big Idea G – Innovating our assessment practices for academic integrity**

(Links to Questions: 42)

Universities are committed to the development of a broad range of graduate capabilities within all disciplines of study. Without doubt, artificial intelligence technologies will increasingly feature in our students’ future careers, and the development of graduate capabilities in these generative technologies is vital if Australian graduates are to remain globally competitive.

There has been a long-standing interest in the relevance of assessment to the development of a range of graduate capabilities. However, in many cases assessment design strategies moved backwards during the pandemic, with lower quality assessments (e.g. take-home tests) supplanting more rigorous approaches. As TEQSA observed in February 2023, the rapid growth in generative AI will require institutions to undertake a “deep rethink of approaches to teaching and learning and assessment practices”. We agree.

Accordingly, we endorse the Accord Panel view that assessment processes need to be reimagined, to ensure that they remain fit for purpose, are robust, and able to assure individual learning. Yet the issue is not primarily a regulatory one. TEQSA plays an important role in the promotion of academic integrity, but what is needed is a concerted and focused effort to achieve a transformative step change in assessment design. If enacted, the following recommendations would ensure our graduate outcomes remain relevant - and assured.

Curtin is proposing that could the Accord process:

* Establish a national Centre of Excellence in Assessment in Higher Education with a three-year remit to engage with industry, students, and academia to lead the development of ‘best of breed’ practices in assessment design which can be deployed across the sector. The Centre would foster a network of communities of practice drawn from across and beyond the sector to critically look at what we assess as well as how we assess to ensure assessments remain fit for purpose in a rapidly changing external environment.
* TEQSA could:

a) Build on the existing academic integrity ‘toolkit’ to encourage further research to keep pace with emergent technologies, cheating methods, and assessment security risks.

b) Leverage existing networks such as the Australian Academic Integrity Network (AAIN) to provide an accessible forum/platform for educators to regularly share resources and good assessment practices.

c) Strengthen the assurance of English language proficiency within admissions processes, irrespective of student entry pathways.

1. At the least LSES, RRR, Disability, Aboriginal and Torres Strait Islander students [↑](#footnote-ref-1)