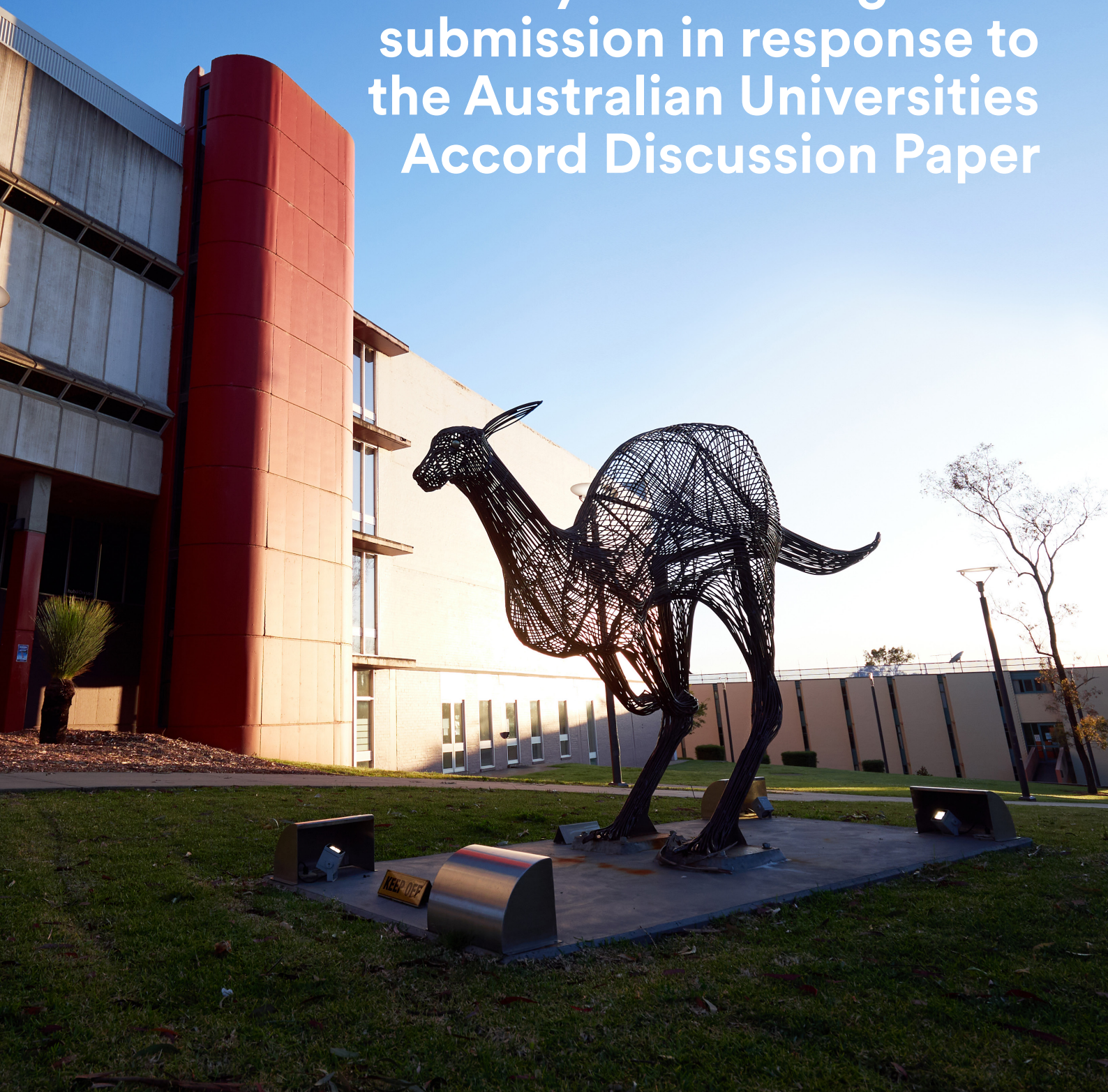
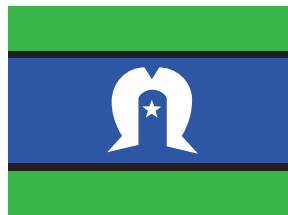

The University of New England's submission in response to the Australian Universities Accord Discussion Paper





Pictured: **Warwick Keen** "Always was, always will be" 2008



Acknowledgement of Country

Acknowledgement of Country The University of New England respects and acknowledges that its people, courses and facilities are built on land, and surrounded by a sense of belonging, both ancient and contemporary, of the world's oldest living culture. In doing so, UNE values and respects Indigenous knowledge systems as a vital part of the knowledge capital of Australia. We recognise the strength, resilience and capacity of the Aboriginal community and pay our respects to the Elders past, present and future.

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Executive Summary

The University of New England (UNE) was first established as a teachers' college in the 1930s and then as an independent university in 1954 with a dual mission:

- to provide access to quality higher education for regional NSW; and
- to pioneer external higher education enabling students from remote areas or with time and distance constraints to access quality education and develop the skills needed for their careers.

Each mission remains at the core of what drives UNE today, making us Australia's most experienced provider of regional and distance/online education.

As Australia's oldest regional university, with a long tradition of multi-modal higher education teaching and research, UNE is pleased to contribute to the Australian Universities Accord process. Our response is informed by the unique perspective our history brings and our ongoing commitment to serve a diverse student body *and* our regional, rural, and remote communities.

National Priority: A strong and responsive higher education system

The Australian Higher Education system exists, and is funded and regulated, to serve the national interest. It has a reputation as one of the highest quality public education systems in the world, in significant part following the Dawkins and Bradley reforms that expanded access to university education.

Nonetheless, the system must respond to new challenges if it is to play its place in serving the national interest for the next generation. Adaptive challenges, rather than incremental change, characterise our world today: the accelerating impact of artificial intelligence and automation on the nature of work, the reshaping of society and economy required to enable decarbonisation, a new global order in which the balance of power and security are shifting. Unless they are tackled systemically, we face existential climate crisis, growing inequality and social division, and stalling growth.

Australia's higher education system has supported and sustained economic growth, social change and national security through the last century – but has required generational re-imagining under Menzies, Whitlam, Dawkins and Gillard, among others. The Accord presents an opportunity to put in place a system architecture that allows the nation's higher education system to respond to today's and tomorrow's adaptive challenges in the national interest.

It must put in place an *architecture for a national system* – not a series of discrete initiatives, measures or funding schemes that take individual institutions as their focus, rather than the nation they serve or the system they form part of.

It must build on the diversity of the current system and recognise diversity in mission, scale and location as a strength. A one-size-fits-all approach will not work in a country as diverse as Australia. Students and communities have different needs – and deserve the benefits of a system that recognises them in the richness of their diversity and in their local context.

It must enable life-long learning for all, so that individuals can continue to acquire the knowledge and skills they require in a transformed society and economy. This is key to Australia's long-term economic success. A discrepancy between the skills that an individual possesses and those required by the economy can result in higher unemployment rates, slower economic growth, and reduced productivity.

It must have a commitment to equity and diversity at its heart. Adaptive change risks reinforcing existing social and economic inequality unless public policy and investment decisions are explicitly attuned to that risk. Inequality harms growth and damages social cohesion. The higher education system must ensure that education and training programs are inclusive and accessible to all, including people with disabilities, women, and marginalised communities – and that research priorities include the causes and consequences of social inequality.

It must ensure that universities have the resources and skills to deliver on their individual missions and measure their success in ways that are appropriate to their missions and the communities they serve. Without stable and predictable resourcing, universities will not be able to innovate and adapt to drive solutions to known and emerging adaptive challenges and their social impacts.

The Accord presents an unparalleled opportunity to put in place policy settings that enable the Australian university system to continue to make the contribution they have made since their beginnings. This submission elaborates on these propositions to provide the basis for a future national higher education system.

High level recommendations

1. Establish enduring principles for a coherent, transparent, and collaborative Higher Education Policy Framework to serve the national interest
2. Recognise institutional diversity as a goal of the Australian higher education system
3. Address the shortcomings of the current student funding model for regional and online universities
4. Boost higher education access and success for equity groups with a multi-year, multi-faceted policy approach
5. Address the shortcomings of the current infrastructure funding model for regional and online universities
6. Tackle adaptive social challenges with industry and government through place-based research-informed policy initiatives
7. Revise the current Work Integrated Learning (WIL) model to address barriers to success, while also creating solutions for regional, rural, and remote areas.
8. Enhancing research collaboration within the sector and with industry can drive solutions to adaptive challenges

Specific recommendations

- 1: That the Accord be underpinned by enduring principles, to create a coherent, transparent, and collaborative Higher Education Policy Framework that transcends government changes and fosters a consistent, long-term approach to post-tertiary education in Australia.
Link to Accord Discussion Paper - Q1: How should an Accord be structured and focused to meet the challenges facing Australia's higher education system? What is needed to overcome limitations in the current approach to Australian higher education.

- 2: That the Accord enhance the role of multi-year mission-based compacts with mission-based funding and accountabilities in the Australian higher education policy environment to ensure the benefits of diversity are increased.
Link to Accord Discussion Paper - Q2: How can the diverse missions of Australian higher education providers be supported, taking into account their different operating contexts and communities they serve (for example regional universities)?

- 3: That the Accord recognise that (a) the current funding model is an inhibitor for universities that attract non-traditional student cohorts and (b) the funding model should incorporate the differential cost to educate and support non-traditional student cohorts, in particular part-time students and equity cohorts.
Link to Accord Discussion Paper - Q6: What are the best ways to achieve and sustain future growth in Australian higher education, given the changing needs of the population and the current pressures on public funding?

- 4: That the Accord recognise and support the significant contributions made by smaller and regional universities. As part of this, the Panel should also commission detailed work on the funding model.
Link to Accord Discussion Paper - Q45: How should the contribution of different institutions and providers to key national objectives specific to their location, specialist expertise or community focus be appropriately financed?

- 5: That the Accord Panel investigates and seeks sector feedback on a holistic funding model that align with agreed principles and supports evolving policy objectives.
- 6: That support and funding provided to institutions to support participation and success of students with a disability be increased to reflect true costs of support.
- 7: That support and funding provided to institutions to support participation and success of students with intersectional profiles be increased to reflect true costs of support.
- 8: That the Accord ensures that the policy-structure that provides support for the needs of non-traditional cohorts of students is adequately resourced and supports the diversity of students and providers.
- 9: That the Accord ensures that the policy-structure that provides support for non-traditional cohorts is adequately and stably resourced, enables innovation and long-term investment and supports the diversity of students and providers.
Link to Accord Discussion Paper - Q33 What changes to funding and regulatory settings would enable providers to better support students from under-represented groups in higher education?

- 10 That there is cross-portfolio recognition of the role that universities play as activation points within regional, rural, and remote communities by providing infrastructure grant schemes for regionally headquartered universities to lead funding applications on behalf of their communities.
- 11 To address regional disparities and promote sustainable development, the federal government should prioritise the development and implementation of place-based research-informed initiatives that tailor interventions to the specific economic, social, and environmental conditions, and involve local universities and stakeholders in the policy design, implementation and evaluation process.
Link to Accord Discussion Paper - Q46 How can infrastructure development for higher education be financed, especially in regional and outer urban locations?
-
- 12 That a coherent national approach to university-industry-government collaboration for the funding and delivery of placements, particularly in critical public sector professions including health and education be considered.
- 13 That sector wide guidelines and approaches for co-design and participation be developed that are adaptive to local circumstance rather than prescriptive.
Link to Accord Discussion Paper - Q23 How should an Accord help Australia increase collaboration between industry, government and universities to solve big challenges?
-
- 14 That research funding schemes which focus on regional policy issues be designed to enhance collaboration between regional universities and their metropolitan counterparts.
- 15 That consideration be given to a community and public sector analogue of the CRC scheme to address the need for system-level research on critical areas of national interest including public education and health-care and the causes and consequences of social inequality.
- 16 Develop a new scheme supporting conjoint appointments (academy and industry) across research themes of national priority, to support a joined-up approach to addressing some of the most intransigent policy issues, such as regional inequality in health and education.
Link to Accord Discussion Paper - Q41 How should research quality be prioritised and supported most effectively over the next decade?
-

Establish enduring principles for a coherent, transparent, and collaborative Higher Education Policy Framework to serve the national interest

The Accord should establish a framework and mechanisms for long-term cooperation and collaboration between the Australian Government, the higher education sector, industry, and related stakeholders that will positively shape post-school education in Australia for the next generation – not just a series of short-term policy initiatives.

To ensure that the Accord provides an enduring foundation for higher education to serve the national interest over a generation, able to withstand the siren-song of short-term expediency, it is important that it is underpinned by a set of principles. Well-chosen principles will provide a framework for decision-making to help ensure that policies stemming from the Accord provide the basis for long-term planning while allowing evidence-based adaptation to meet evolving needs. By promoting transparency and stakeholder engagement, principles will also help to ensure that policies are developed and implemented in a way that is widely accepted and supported by the sector.

These principles will also provide universities with a basis on which to plan and a sense of security in a shared vision. They will mitigate the risk of well-intentioned but poorly integrated stop-gap programs, that limit the development of a coherent and sustained approach to post-secondary education. UNE recommends the following principles be considered as guiding principles for the Review and for the development of future policy and programs:

- **Principle 1:** Higher education policy serves the national interest through the design, funding and regulation of a national higher education *system* that promotes collaboration and complementarity over competition
- **Principle 2:** Higher education serves individual and national purposes that are economic, social and democratic
- **Principle 3:** The diverse needs of individual learners, their communities and the nation are best served by a higher education system that embraces and values institutional diversity
- **Principle 4:** Individual institutional mission-based compacts that together serve the overall goals of the national system accommodate diversity in goals, mechanisms, measures and accountability
- **Principle 5:** Institutions should be funded and accountable in ways that are adequate and appropriate to achieving their agreed individual missions
- **Principle 6:** Once agreed, funding should be stable (in real terms) over the life of mission-based compacts to allow for innovation and adaptation in delivering on that mission
- **Principle 7:** Regulation and reporting should reflect principles of risk, proportionality and necessity, and should be nationally consistent wherever possible

Recommendation 1: That the Accord be underpinned by enduring principles, to create a coherent, transparent, and collaborative Higher Education Policy Framework that transcends government changes and fosters a consistent, long-term approach to post-tertiary education in Australia.

Recognise institutional diversity as goal of the Australian higher education system

Encouraging and recognising diversity of mission is fundamental to the long-term success of the higher education sector in Australia. The demographic that each university serves, the knowledge and skills required within communities, the number of non-traditional students enrolled, and the research focus should inform the operating and business model of each university. The reality is that in the Australian context the policy environment supports a predominantly one-size-fits-all regulatory and funding approach.

A core challenge for the current system is to fully support institutional diversity. Australia's 39 public universities vary in size from almost 8,000 EFTSL to 67,000 EFTSL – resulting in very different economies of scale. International student enrolments ranging from under 2,000 to over 40,000 head count based on 2020 sector data – resulting in very different capacities to invest in research and infrastructure from sources other than CSP funding.¹ Their research outputs vary, from having 79 fields of research (FOR4) rated as well above world standard to having only three fields of research above world standard.² Their principal campuses are in cities and towns with populations ranging from 20,000 to over 5 million – with different cost-structures reflecting those locations. In 2020, their online/distance cohorts ranged from 1% to 86%.³ Yet every university is regulated and funded under essentially the same model.

A homogeneous university sector policy approach poses significant challenges:

- It discourages participation by non-traditional students, perpetuating inequitable access and outcomes for disadvantaged student groups as it does not provide adequate support and recognition of difference.
- It provides a false sense of choice within the sector, as many providers seek to offer near- identical products and experiences.
- It limits innovation and creativity in research, teaching and learning as in practice the lack of diverse perspectives and experiences stifles new ideas and innovation.
- Where a homogenous approach is also reflected at the policy and funding level despite differences in cost of delivery, it embeds inequities in funding.⁴

As noted by Glyn Davis,⁵ “history suggests diversity cannot be mandated but it can be encouraged System design matters ... and this requires a partnership between institutions and policy makers”. And as Goedegebuure, Massaro, Meek and Pettigrew argue, in the context of identifying how to achieve a diverse system:⁶

“As has been shown over many decades in many countries, central planning initiatives are rigid, cumbersome and seldom deliver on their promises. This is even more so for tertiary education that best thrives in a decentralised and autonomous environment. Such an environment, however, is not synonymous with an absence of responsibility and accountability. The receipt of public resources must be tied to appropriate performance expectations. And the most effective means of achieving this is through performance agreements based on an agreed institutional profile rather than through command and control mechanisms. Systems like this operate effectively in several comparable developed and well-respected tertiary education systems, in regions ranging from California to South Korea, Hong Kong, Singapore, the Netherlands and Ireland.”

They identify components of such a system that align with the principles articulated above:

- A role for government (directly or through an arms-length tertiary education commission) in agreeing individual mission-based compacts
- The importance of collaboration and coordination in a coherent system
- The need for medium-term stability of funding coupled with accountability for results

The Accord should therefore consider enhancing the role of multi-year mission-based compacts with mission-based funding and accountabilities in the Australian higher education policy environment to ensure the benefits of diversity are increased.

Recommendation 2: That the Accord enhance the role of multi-year mission-based compacts with mission-based funding and accountabilities in the Australian higher education policy environment to ensure the benefits of diversity are increased.

Recognise and resource the unique contribution that regional and distance-education focused universities make to their students and communities

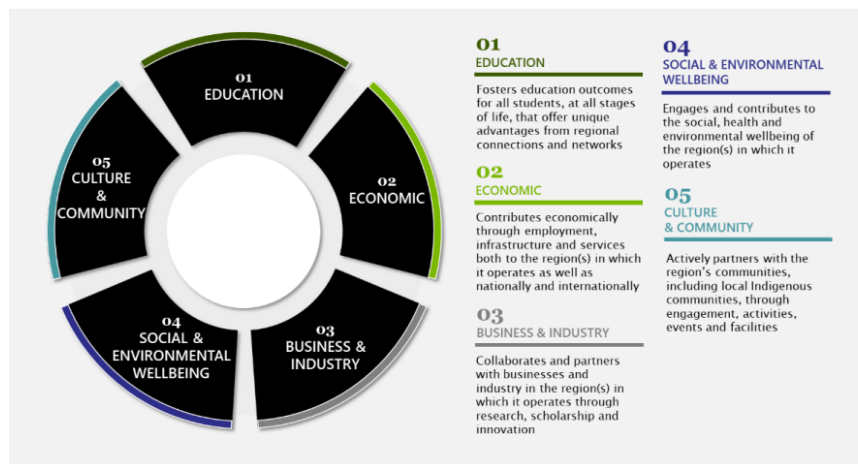
Australia needs strong regions – and this means that higher education attainment rates from regional Australia must be lifted. Treasury's 2021 Intergenerational Report predicts a slowing in population growth over the next 40 years at a time when the nation will require a highly skilled workforce to meet expected skills shortages.⁷ One-third of the national workforce is employed outside capital cities; however, levels of higher educational attainment remain well below the Australian average.⁸ The National Regional Rural and Remote Tertiary Education Strategy Final report found that attainment rates for regional, rural, and remote cohorts lagged by 19-24% compared with metropolitan counterparts at bachelors level.⁹ For Aboriginal and Torres Strait Islander peoples, only 1 in 10 was participating in higher education in 2021.¹⁰ With the National Skills Commission forecasting that nine out of every ten Australian jobs created over the next five years will require post-secondary education¹¹ this challenge must be addressed.

Regional universities are uniquely well-placed to address the need to increase higher education attainment rates in regional Australia. In 2021 RUN universities collectively graduated over 34,000 students.¹² In general, 70 per cent of these students go on to remain living and working in regional, rural, and remote Australia.¹³ As also highlighted in the RUN submission, in spite of only enrolling 12.10% of Australia's domestic students, regional universities enrol 23.30% of indigenous enrolments, 20% of Low SES, 28.10% of regional and remote and 13.5% of disability enrolments.¹⁴ Regional universities are the universities of first choice for many regional and metropolitan students who seek the distinctive experience of a regional education. They also provide educational opportunities for regional students who cannot relocate to metropolitan universities for economic, family or social reasons.

Similarly, distance-education focused universities are uniquely well-placed to address the needs of later-in-life learners, accessing university education for the first time while balancing family and full-time work. The flexibility and accessibility offered by such providers is essential for a system that addresses the need of *all* learners.

Regional universities are also significant contributors to economic and social activity in their communities.¹⁵ In 2021, UNE undertook, in conjunction with Nous, a project to determine the success factors of a leading regional university. Reviewing the missions and outcomes of a number of regional universities around the world, we determined that a leading regional university should be aiming to meet measurable outcomes in five key domains:

FIGURE 1: LEADING REGIONAL UNIVERSITY METRIC DOMAINS



These domains provide a starting framework for the Panel to consider the areas in which regional universities need to be supported to achieve outcomes that facilitate student access and attainment, regional renewal, and national growth.

These domains are already core business for Australia's regional universities. For example, UNE contributed \$318m to the Armidale region in 2018 (the most recent year for which this was assessed). The University makes a direct regional contribution in research, innovation, and scholarship. This is evidenced in partnerships accelerating innovation and increasing economic activity in the region's agricultural sector by enabling collaboration between researchers, industry, and primary producers to develop smart technologies that increase the sector's productivity and resilience to natural disasters.¹⁶ Through Project Zero30, UNE, Armidale Regional Council, Business New England, and the local community have developed a collective vision for carbon-neutrality for the Armidale region under the Climate Active Standard, making Armidale and surrounds one of the first areas in Australia to tackle carbon-neutrality as a community¹. Our educational offering addresses the needs of our regional communities and is informed by the communities in which we are located.

Similarly, UNE contributes to the social fabric of our region. For example, UNE's Sporting Precinct is situated on the UNE Armidale Campus, adjacent to the residential colleges, near to the academic campus and within easy reach of the larger community. The precinct is a regionally significant sports facility hosting regular sports, recreational, and active participation and wellness events for UNE students, staff, and community. Annually there are over 280,000 participant visits to the precinct, and the precinct regularly hosts large scale community sporting carnival and events. There are no comparable facilities to support community sport in northern New South Wales. These facilities are wholly owned and maintained by UNE and provide a significant benefit to the region, which would not otherwise be realised.

Regional universities are civic anchors for the communities in which they operate and their communities rely on them to deliver education, expertise, and access to critical infrastructure and services. Regional universities are deeply anchored in specific communities – they are not outposts of some distant entity but in, and of, their communities. Long-term sustainable investment in services and infrastructure, in addition to the jobs and economic opportunities created by regional universities, help to create the high quality of life that draws people to the regions and keeps them there. Regional universities are uniquely positioned to deliver research and innovation that addresses both the specific issues facing regional populations and significant national and global issues like food and water security, climate change, and restoring and protecting the natural environment.

Like other universities, UNE shares in the responsibility for developing students so that they can contribute meaningfully to society, enriching the people, businesses, and industries in their (physical and virtual) communities, and contributing through research and innovation to solutions for the global community.

However, to deliver on regional workforce challenges while addressing their critical civic and community roles, regional universities face additional challenges and costs, compared with larger metropolitan universities, that must be acknowledged and considered as part of the Accord. Regional universities operate in thinner markets than metropolitan universities, with (on the demand side) fewer students seeking to study in each discipline, and (on the supply side) higher costs for basic goods and services. Regional universities are more vulnerable to declining enrolments due to demographic changes, competition from larger universities, or changes in government policies. International student numbers are lower with RUN universities enrolling just 3% of onshore international students in 2018¹⁷. Of this 3%, UNE had just 989 onshore international students.¹⁸ Opportunities for industry investment in infrastructure are more limited as the return on commercial investment is not as compelling as in the metropole. Fragmented networks and the small scale of industry investment in many regional locations limits opportunity for innovation and research within local communities.

Combined, these challenges mean that one-size fits all funding models will not enable regional institutions to meet their critical responsibilities. The Accord offers an opportunity to align policy and funding to ensure the continued contribution of regional universities to their wider communities by acknowledging the distinctive needs and challenges of these institutions.

Thus, from a regional Australia perspective, the Accord should focus on two key challenges:

1. Supporting access to and successful completion of higher education across regional communities to facilitate regional growth and renewal through the provision of a sustainable, enduring, and focused suite of policies and funding model which provide support for all Australians, regardless of location or background, to participate and succeed.
2. Supporting the mission of regional universities via a long-term investment in a whole-of- Government policy approach, ensuring that policy intentions do not yield perverse outcomes for smaller, regional institutions. This requires that funding agreements be enduring, stable and adequately linked to genuine engagement and outcomes for regional rural and remote Australians.

Recommendations to address these challenges are included in subsequent sections of this submission.

Address the shortcomings of the current student funding model for regional and online universities

The current student funding model does not adequately support the costs of educating and supporting large cohorts of students who are over-represented in regional and distance/online-focused universities. As noted previously, the RUN submission to the Accord highlights that:

'RUN universities host 12 per cent of Australia's total domestic enrolments, they enrol 23 per cent of the nation's total Indigenous enrolments, 20 per cent of all low SES (Student Experience Survey) enrolments, and 28 per cent of all regional/remote enrolments; representing the largest proportions of enrolments among these equity groups of any university sector network. RUN universities also enrol over 14,500 students with a disability'.

Universities such as UNE, with a strong distance or external education history and mission, also attract a high number of online students (in 2022 more than 80% of UNE's students were studying online). These students are often mature age, in full-time work and studying part-time – choosing the online modality in order to accommodate their work and family while seeking to attain the skills and qualifications that will allow them to advance in their current or new careers.

Almost all the drivers of student funding in the current system are based on EFTSL – equivalent full-time study load. Those drivers measure with relative accuracy the number of unit or subject enrolments and therefore the variable costs of teaching those units or subjects.

But those drivers fail in two respects to address the cost-drivers experienced by regional universities:

- First, they do not account for the institution-wide fixed costs of the low-enrolment units that smaller regional universities offer as part of their civic obligation to serve the needs of their regional communities – and the needs of their distance education cohort.
- Second, they do not account for the fact that many of the costs of providing support services scale with the number of students enrolled, not with the number of units or subjects those students enrol in. Examples include enrolment and advising services, learning support, counselling/psychological services and careers services. (Later in this submission, we address the additional costs from an equity perspective.)

In a metropolitan university in which students typically enrol in a near full load (> 0.8 EFTSL) and economies of scale are available, this misalignment of costs and driver is attenuated; however, in a regional or distance/online-focused university in which students typically enrol in closer to half load (~ 0.45 to 0.6 EFTSL) and take much longer to complete their degree (while they balance study with family and existing work commitments), the misalignment of costs and drivers leaves student support and other services under-resourced.

A modern higher education system must recognise the likelihood that many students will engage and disengage with study in a more flexible manner over any period. Policies and funding that recognises the need for flexibility – and the costs of that flexibility – are necessary.

Recommendation 3: That the Accord recognise that (a) the current funding model is an inhibitor for universities that attract non-traditional student cohorts and (b) the funding model should incorporate the differential cost to educate and support non-traditional student cohorts, in particular part-time students and equity cohorts.

Despite the additional costs of delivery and issues of scale, it is essential that regional universities can continue to offer comprehensive choice in educational offerings in order to ensure that regional students can study and work within their community and meet current and future skill needs.

A study undertaken by RUN and NOUS in 2020 found that in the year 2018 RUN universities contributed \$2.4b in real GDP to regional Australia, created 11,300 jobs and that 7 out of 10 of their graduates went on to work in a regional location¹⁹. The same study found that:

- Doubling RUN's research income would generate an additional \$94m in real GDP and support 600 additional jobs in regional Australia
- Lifting regional higher education participation rates by 6,000 more students would generate an additional \$122m in real GDP and create 690 additional jobs

The Accord should consider how this public good contribution of smaller and regional institutions is recognised and supported, in particular given that they:

- established within, and for, regional communities
- have most of their operations (teaching, research, and engagement) outside metro and urban areas
- are often the largest employer in the region
- offer teaching, research and engagement that serves the educational needs of the community and industry both within and outside the region
- are likely to have a diverse cohort of students (e.g., culturally) due to the university's provision of education to groups who might otherwise be unable to access it
- provide significant contributions economically and socially to the region(s) in which it operates

For example, UNE's Smart Region Incubator (SRI) is a connected community of founders and innovators who share a deep commitment to seeing new and existing enterprises flourish in the New England Northwest region of NSW. As a university-led business incubator, the SRI supports innovation across the New England Northwest by connecting founders, researchers, school and university students, mentors, experts, investors, government, and business partners. Through collaboration the SRI helps to deliver new products and services to market. The UNE SRI works across the region and has physical locations in [Moree](#), [Tamworth](#) and [Armidale](#) and is coming soon to [Narrabri](#). Strengths lie in [agriculture](#), [health](#), [environment](#) and [creative industries](#), and are developing in education, IT (Information Technology), finance, legal, and manufacturing sectors.

Recognition of the public good contribution of smaller and regional institutions is crucial in ensuring that regional students can continue to have access to comprehensive higher education in place and local communities supported by resilient and sustainable anchor institutions to help support regional growth.

There are many policy levers that government could consider such as the development of specific place-based policy initiatives, a dedicated funding pool to support the social charter of universities, provision of targeted access to grants for infrastructure and research, further incentivising regional industry partnerships through the taxation system, and/or offering scholarships and grants to encourage diverse student participation.

Whichever mix of policy mechanisms are endorsed, a long-term investment in a whole-of-Government approach will be required²⁰.

As part of a holistic approach to higher education, funding needs to be simplified. A funding model that minimises reliance on contingent and at-risk funding schemes such as NPILF and HEPPP should be considered. Managing contingent and at-risk funding can be administratively burdensome for government agencies, particularly if they are working with a large number of recipients, and for the recipients themselves as compliance requirements can be time-consuming and expensive, particularly for smaller universities. It can also lead to a focus on short-term outcomes rather than longer-term national outcomes, institutional sustainability and impact. (This is not to reject the idea of accountability and performance funding – but appropriate balance should be considered and a distinction observed between funding for core commitments, including equity and industry-engagement, and performance funding.)

Overall, UNE suggests that any future support for the public good contribution of smaller and regional institutions ensures:

- resourcing is adequate for different missions, different cohorts and different costs of delivery
- that the funding model and compacts roll up funding streams to provide for simpler administration and focus on outputs
- that transitional arrangements do not create disadvantage for individual universities and considers the disparity in the ‘starting point’ for each institution.

Recommendation 4: That the Accord recognise and support the significant contributions made by smaller and regional universities. As part of this, the Panel should also commission detailed work on the funding model.

Recommendation 5: That the Accord Panel investigates and seeks sector feedback on a holistic funding model that align with agreed principles and supports evolving policy objectives.

Boost higher education access and success for equity groups with a multi-year, multi-faceted policy approach

Supporting access and participation in higher education brings significant national benefits. As outlined in previous sections, the economic return to the nation is significant.²¹ However, for higher education to sustain these national benefits together with social and financial return for individuals, the system must keep pace with the changing nature of work and the knowledge and skills required for long-term success.²²

The Bradley target for bachelor's level attainment was met at national level – but not for regional, rural and remote cohorts or for ATSI students. The final report of the Bradley Review (2008) proposed an ambitious target of 40% of all 25-34-year-old attaining a bachelor's level qualification by 2020. Although this target was achieved for the general population, participation and attainment remain well below this target for regional, rural, and remote student cohorts and for Aboriginal and Torres Strait Islander peoples. As noted in the previous section, the National Regional, Rural and Remote Tertiary Education Strategy Final Report found that attainment rates for regional, rural, and remote cohorts lagged by 19-24% compared with metropolitan counterparts at bachelors level.²³ For Aboriginal and Torres Strait Islander peoples, only 1 in 10 was participating in higher education in 2021.²⁴

The playing field simply remains skewed against those that come into higher education from non-traditional backgrounds. Support for participation, success and attainment is inadequate to meet the needs of these cohorts – and the impacts are felt, particularly in the regions.

In particular, disability inclusion is critical for Australia's socio-economic development. The social, economic, and physical wellbeing of people with disability is improved by access to tertiary education.²⁵ Yet, while people with disability remain one of the groups with the most significant increase in enrolments in tertiary education, they experience lower levels of access, participation, retention, and success compared with their non-disabled peers.²⁶ They also experience lower levels of employment and are paid less than those without disability. These statistics are borne out of higher education statistics, student satisfaction surveys and graduate outcome surveys²⁷. This is not news to policy makers or higher education practitioners. A key recommendation from the Bradley Review (2008) (recommendation 31) has not yet been implemented:

“That the Australian Government increase the funding for the access and participation of under-represented groups of students to a level equivalent to 4 per cent of the total grants for teaching. This would be allocated through a new program for outreach activities and a loading paid to institutions enrolling students from low socio-economic backgrounds. Funding for the Disability Support Program would be increased to \$20 million per year.” (Chapter 4.2)

In reality, funding for students with disability under the Higher Education Disability Support Program was only \$7.9 million per annum in 2021 (indexed).²⁸ This equates to an average of \$110 per student with a disability. This is in stark contrast to the investment being made by the Commonwealth in schooling from 2018 to 2029, where it will invest an estimated \$28.8 billion loading for students with a disability.²⁹ On average, funding for school students with disability will grow by 5.1% each year over this period and each student with a disability will be allocated between \$4,704 and \$35,350.

The failure of successive Governments to implement Bradley's recommendation 31 means that these costs are currently borne by individual universities.

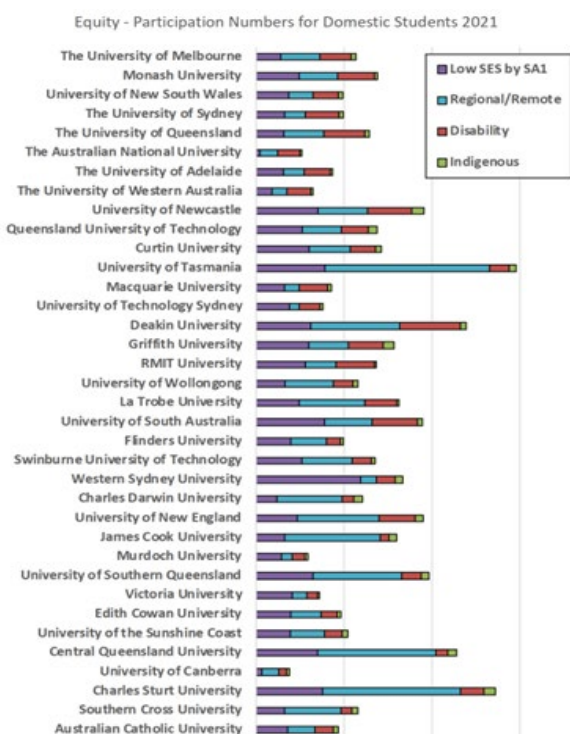
Regional and distance-education focused universities serve disproportionately large cohorts of students requiring equity support. In addition, regional universities often have larger cohorts of low-SES, regional rural remote, Indigenous, and first-in-family students who do not come to university with adequate preparation for study.³⁰ Similarly, those students who return or come to distance/online study later in life in order to adapt their careers to changing economic situations are often not prepared for traditional university life and/or study part time. This puts strain on institutions to provide extra support for a larger number of students, including those that do not fit the current HEPPP (Higher Education Participation and Partnerships Program) definition. In addition, the Job Ready Graduates Scheme (and in particular the 50% failure exclusion) operates punitively for those that are less well prepared for study and who require additional time and support to transition effectively.

As outlined in Table 1,³¹ regional universities have a higher proportion of students with intersectional equity profiles, and multiple and complex needs.

This reflects the wider communities in which they are headquartered, and it is a vital component of the mission of these universities to support these students. Whilst there is limited data available within the Australian context or globally to indicate the scale of the additional cost to universities of supporting non-traditional students through their education, investment in support for students in post-secondary education should be proportionate to that provided to the same students in the school system, as discussed above – their needs for support and the costs of providing that support do not magically disappear when they graduate to post-secondary education.

Equity funding should be a core component of mission-based funding (aligned to institutional mission and the costs of supporting the targeted cohorts), not an annual allocation whose contingency can inhibit embedding of access and support programs into the core mission of institutions or require tracking against individual students. It should scale with equity-cohort student headcount not equity-cohort student EFTSL. The current HEPPP model of annual funding allocations comes with significant administrative overhead and discourages the development of longer support programs and interventions. Longer-term funding allocations for institutions whose mission supports non-traditional cohorts would ensure better policy outcomes through program longevity and stability, which provide the foundation for innovation and adaptation. Most importantly, it would ensure that students can be adequately and consistently supported over the course of their studies. (Other programs that target additional CSPs for students from equity cohorts are an example of disproportionate regulation. It is difficult to discern the public policy rationale for requiring institutions to track funding against 20 individual students among a cohort of 20,000, for example.)

TABLE 1 EQUITY- PARTICIPATION NUMBERS FOR DOMESTIC STUDENTS 2021



Recommendation 6: That support and funding provided to institutions to support participation and success of students with a disability be increased to reflect true costs of support.

Recommendation 7: That support and funding provided to institutions to support participation and success of students with intersectional profiles be increased to reflect true costs of support.

Recommendation 8: That the Accord ensures that the policy-structure that provides support for the needs of non-traditional cohorts of students is adequately resourced and supports the diversity of students and providers.

Recommendation 9: That the Accord ensures that the policy-structure that provides support for non-traditional cohorts is adequately and stably resourced, enables innovation and long-term investment and supports the diversity of students and providers.

Address the shortcomings of the current infrastructure funding model for regional and online universities

There has not been a dedicated general-purpose university infrastructure funding scheme since the EIF wound up in 2019.³² The Education Investment Fund (EIF) provided significant national investment in regional higher education facilities, and more importantly, investment in regional communities. This investment delivered a significant suite of public assets, headquartered at universities, and focused on supporting the unique and various institutional research, teaching, and outreach missions. For example, at UNE, a decade ago, EIF provided \$27m of support for a state-of-the-art Agricultural Education building which includes 17 specialised laboratories and sound-proofed and temperature-controlled work rooms for researchers and students. The multi-discipline Zoology Teaching museum and Resource Centre provide significant opportunities for the wider community, particularly for school students in the region, through access to world class laboratories and collections.

Australian Government public investment in university infrastructure has progressively fallen away. In 2009-10 investment was almost \$1.4 billion, falling to around \$170 million in 2016-17.³³ Since 2019, there has been no dedicated infrastructure funding scheme for public higher education in Australia. In terms of global comparisons, the public funds as a proportion of GDP invested in tertiary education in Australia was below the OECD average.³⁴ Ongoing under investment in infrastructure for public higher education exposes Australia to an increased likelihood that we will be left behind other jurisdictions such as the United Kingdom and Canada which continue to make significant investment in tertiary education infrastructure.³⁵

Regional universities, with smaller scale, fewer international students, limited PPP/co-development opportunities and higher building costs, therefore face almost insuperable challenges in maintaining and developing physical and digital infrastructure. Although there are focused schemes which support research infrastructure, such as the National Collaborative Research Infrastructure Strategy (NCRIS),³⁶ facilities for students and general use must be funded from university revenue. For many large metropolitan universities significant capital works can be funded through international student revenue, private sector property initiatives and philanthropic donations. For smaller, non-metropolitan and regional universities, large surpluses driven by economies of scale, international fees and philanthropic donations are not a reality.

The decline in public sector investment in regional infrastructure more broadly means that regional universities have an effective civic obligation to maintain infrastructure which is often used as a community asset as much as an institutional asset. The role of regional universities as anchor institutions in their communities means that committing to maintaining community infrastructure is a deliberate and strategic decision that comes at a large cost. These decisions are often critical for regional communities and regional student cohorts.

Recognising the value of diversity within the national university system therefore requires recognising the infrastructure costs of that diversity through targeted and differential funding.

Invest in infrastructure is a systematised way to address the existing backlog maintenance of the University sector. Target support for regional organisations to ensure that they can meet their obligations to students, partners, and communities, noting the wider role of universities in small regional areas.

Regional infrastructure schemes should not exclude universities from leading collaborative bids. One way to ensure that regional universities can support their communities to innovate and thrive is to ensure that they are not locked out of infrastructure funding schemes due to their status as a public institution. In many cases, regional universities are the largest employers and have the widest range of professional skills and services within a region. However, universities are still deemed ineligible to lead, and in some cases to participate, under most regional infrastructure grant guidelines. To participate, universities need to partner with either a not-for-profit, a local government agency or body, or a non-distributing co-operative. This represents an opportunity to work with community and local government in regional areas to deliver a joined-up approach to projects providing direct benefit to the region. Regional universities can provide expertise, financial security and assets that may not otherwise be available in local communities, which can be utilised to support community endeavours.

Recommendation 102: That there is cross-portfolio recognition of the role that universities play as activation points within regional, rural, and remote communities by providing infrastructure grant schemes for regionally headquartered universities to lead funding applications on behalf of their communities.

Tackle adaptive social challenges with industry and government through place-based research-informed initiatives

Australia faces a considerable number of challenges that can only be addressed through coordinated collaboration between community, government, and industry.

These challenges include climate change impacts and mitigation strategies, national security, health, and population issues. The Accord must look forward to ensuring that our national higher education system is designed to meet these issues.

Global experience provides examples of how a multifaceted approach led by government provides the clearest pathway to success. System-based and place-based policy, adaptive governance and vertical and horizontal cross-government collaboration combined with industry and university incentives are all required for success.

Place-based policies can effectively address some of the nation's most profound challenges by tailoring interventions to the specific economic, social, and environmental conditions of a particular location or setting, and by involving local stakeholders in the policy design and implementation process.

The model has been successfully demonstrated overseas to address economic development and grand challenges like climate change,³⁷ and analogues exist in the collective impact approach to collaboration between communities, government and for-purpose organisations to address entrenched disadvantage,³⁸

However, to date, similar place-based approaches to public policy have not been widespread in the federal policy context in Australia leaving universities with a strong place-based mission such as UNE to largely 'go it alone' in terms of major initiatives with a regional place-based focus.

For example, since 2020 UNE has been committed to and investing in the New England Virtual Healthcare Network (NEViHN). NEViHN is an innovative education and healthcare solution to support the delivery of in-place healthcare for patients together with in-place learning for all future UNE medicine and health students in the New England Northwest. UNE has been seeking Government investment in this initiative, which supports the Government's aim to improve access to affordable, quality healthcare to deliver world-class health outcomes for all Australians. It also aligns with the goals of the Health Technology Assessment Review to ensure that processes keep pace with rapid advances in health technology and that barriers to access are minimised. To seriously make a difference to regional need, NEViHN and other innovative approaches to wicked problems require a multifaceted approach to policy that includes community, government, and industry. To date this has not been forthcoming.

Nonetheless, UNE has a long history of working with industry partners to support the delivery of key policy outcomes. For example, UNE will lead a ground-breaking research collaboration that will help the nation's sheep graziers overcome an important barrier standing in the way of carbon neutrality, thanks to a \$1.9 million grant from the Australian Government's [Methane Reduction in Livestock Program](#) (MERiL). The project, which is in partnership with the [Department of Primary Industries and Regions, South Australia](#), the [University of Western Australia](#), [Feedworks](#) and [Australian Wool Innovation](#), will trial the use of automated feeders designed to deliver methane-reducing additives to sheep. Similarly, UNE is leading a collaborative effort through the recently founded Manna Institute, involving all Regional University Network (RUN) partner organisations.

The Manna Institute is a virtual institute of leading researchers working with industry and community partners to improve mental health and wellbeing in rural, regional, and remote Australia. It is funded by a Commonwealth grant under the Regional Research Collaboration program and aims to foster meaningful research, professional workforce development, and the translation of research findings into practical, place-based programs. This collaboration of regional universities is vital for the health of all communities across Australia.

Recommendation 11: To address regional disparities and promote sustainable development, the federal government should prioritise the development and implementation of place-based research-informed initiatives that tailor interventions to the specific economic, social, and environmental conditions, and involve local universities and stakeholders in the policy design, implementation and evaluation process.

Revise the current Work Integrated Learning (WIL) model to address barriers to success, while also creating solutions for regional, rural, and remote areas

At a more granular level, collaboration with industry is vital in terms of the delivery of skills and qualification across the higher education sector. Work Integrated Learning (WIL) and Work Based Learning (WBL) has become a priority for Australian employers, universities, and government. Demand for work-ready graduates has required universities to revisit traditional qualifications to provide opportunities for combining theory and practice through WIL / WBL activities. In response to industry pressures and opportunities, universities across Australia and governments have embedded an emphasis on WIL / WBL through dedicated strategic goals and priorities. In 2015, the focus on WIL / WBL was articulated by industry stakeholders in the National Strategy on Work Integrated Learning in University Education, developed in collaboration between Australian peak industry groups and the ACEN. This strategy seeks to enhance and grow WIL / WBL opportunities and programs across Australia through industry partnerships, business and higher education capacity, and increased support and investment for WIL / WBL regulation. Enriched international student WIL / WBL experiences have also been indicated as a strategic priority by the Federal Government. The increasing focus on WIL / WBL across the sector has resulted in increased competition for WIL / WBL experiences. Universities are actively exploring new ways to deliver WIL / WBL to respond to industry competition and prepare students for a dynamic and evolving Australian workplace.

UNE welcomes the opportunity for further shift in the paradigm in the WIL/WBL space, in particular the intensive placement model that has been a feature of some degrees.

The current model has specific problems that a revised model must address:

- Employers are not required, encouraged or facilitated to accept students on placements despite their need for graduates
- Small employers can find the legal requirements of accepting students on placements impossible to bear – and the regulatory burden on universities is itself complex
- Unfunded costs are imposed on students, universities and employers
- Universities are driven into an unhealthy and unproductive competition for placement places

Two specific challenges compound the national challenges in regional, rural and remote Australia:

- A vicious cycle perpetuates the shortage of teachers and health professionals – workforce shortages (to the point of crisis in the health care system in much of regional Australia) mean that employers cannot accommodate and supervise students on placement, which means either capacity constraints on the relevant degrees or that the students move away to complete their placements and are less likely to return to work in regional, rural and remote Australia. There are opportunities to reshape the placement model (including through the NEViHN model outlined above) – but significant coordination between health (or education) systems and providers, accrediting bodies and universities and funding will be required to drive the transformation.
- Regional, rural and remote students routinely face the travel and accommodation costs of relocating to complete mandatory placements – while still needing to cover the costs of their usual accommodation.

A national coordinating office (which would need State involvement given the central role of State health and education departments in hosting placements) could drive greater alignment between the various parts of the system, clarify funding responsibilities, simplify legal requirements and (in particular) address the perverse outcomes in regional, rural and remote Australia that further disadvantage already under-served communities.

Recommendation 12: That a coherent national approach to university-industry-government collaboration for the funding and delivery of placements, particularly in critical public sector professions including health and education be considered.

Recommendation 13: That sector wide guidelines and approaches for co-design and participation be developed that are adaptive to local circumstance rather than prescriptive.

Enhanced research collaboration within the sector and with industry can drive solutions to adaptive challenges

Research plays a crucial role in driving Australia's economic, social and environmental health and well-being. Today's adaptive challenges reinforce the importance and benefits of university-led research.

Much of the research carried out in Australia, with significant benefits for society and the economy, depends on public funding, as it does in other jurisdictions. In Australia, this dependency is accentuated by multiple factors:

- the very limited extent to which R&D-dependent multinational corporations conduct that R&D in Australia
- the very large SME sector, a sector that has limited capacity to invest in R&D
- R&D incentives for industry that are misaligned to driving R&D that addresses adaptive challenges as opposed to business-optimisation
- the lack of commercial returns for research that would address critical adaptive challenges in the social and community sector

It is essential, therefore, that the Accord:

- reaffirms the national interest in publicly-funded research and communicates its importance to the general population
- contains measures to drive closer ties between Australia's domestic research funding bodies and other national and international funding bodies
- identifies the need and opportunity for policy settings to better incentivise local and inbound R&D investment

We understand these challenges and priorities are well-addressed in other submissions and therefore focus on the policy settings that limit the benefits achievable from a genuinely diverse and heterogeneous university research sector – and in some cases threaten elements of that sector.

Regional universities have unique research capacities in fields directly relevant to their communities. They often depend on and sustain long-standing connections to local industry. However, their relative scale (and resourcing) can put them at a disadvantage in research funding decisions when competing with larger metropolitan institutions – with the risk then of disrupting embedded and longstanding research relationships. Incentivising metropolitan universities to collaborate with regional universities would reinforce and extend those relationships and build capacity in the smaller regional institutions. UNE therefore encourages further exploration of funding schemes that require collaboration with regional universities to advance research in areas that directly impact regional communities.

Recommendation 14: That research funding schemes which focus on regional policy issues be designed to enhance collaboration between regional universities and their metropolitan counterparts.

There are many instances where critical research is needed in fields which do not attract industry investment, such as public education and public healthcare. For example, education and public health research do not rate in the top fields of research for 2019-2020 in terms of business expenditure on R&D (BERD), noting that the top six fields combined represent 91% of BERD in the reporting year.³⁹ The lack of commercial returns in fields such as these means that investment is unappealing for commercial organisations, and to rely on such would ensure market failure.

The development of a collaborative model in key areas akin to the longstanding Collaborative Research Centres (CRCs) which require community or government partners as distinct from industry partners should be considered to avoid market failure.

Recommendation 15: That consideration be given to a community and public sector analogue of the CRC scheme to address the need for system-level research on critical areas of national interest including public education and healthcare and the causes and consequences of social inequality.

Integration of HDR students with industry is non-negotiable if Australia's universities are genuinely going to change the way in which they integrate research with industry. The UNE Doctor of Philosophy (Innovation) PhD.I is a unique, project-based, higher research degree. The PhD.I runs across all our schools and disciplines, linking professional and industry expertise with academic theory in creating innovation. It involves contextual research on a project that identifies one or more tangible or process-based innovations that will have identifiable impacts when implemented. This doctorate underpins project-based research on an innovation within a field of industry or community expertise. It currently attracts candidates from Australia and internationally.

UNE's PhD.I program is an example of the way in which research training can be productively scaffolded within the context of industry experience. This approach ensures that links between the University and industry are closely maintained and remain in place long after the candidate has completed their studies. These networks are vital for future collaboration on research and development but should expand beyond HDR candidates. Embedding academic and professional researchers with industry must become standard practice if Australia's universities are going to continue to make significant contributions to lifting Australia's capacity. To facilitate this, consideration should be given to a scheme supporting conjoint appointments (academy and industry) across research themes of national priority, to support a joined-up approach to addressing some of the most intransigent policy issues, such as regional inequality in health and education.

Recommendation 16: Development of a new scheme supporting conjoint appointments (academy and industry) across research themes of national priority, to support a joined-up approach to addressing some of the most intransigent policy issues, such as regional inequality in health and education.

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²⁷ [Current HE Data Analysis - ADCET](#)

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²⁹ [Education Portfolio Budget Statements](#)

³⁰ National Regional, Rural and Remote Tertiary Education Strategy

<https://www.education.gov.au/access-and-participation/resources/national-regional-rural-and-remote-tertiary-education-strategy-final-report>; <https://nap.edu.au/docs/default-source/default-document-library/2019-naplan-national-report.pdf> http://www.ncsehe.edu.au/wp-content/uploads/2018/05/55_Federation_MarciaDevlin_Accessible_PDF.pdf

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