

**A Submission into Australian Universities Accord
Discussion Paper**

Presented by The National Union of Students

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What is the National Union of Students

The National Union of Students (NUS) is the peak-body organisation advocating for student values at the national level. We were founded in 1987 to represent all post-secondary students across Australia, including vocational, higher education, international and domestic students. We are the peak representative and advocacy body for almost 1 Million students. We seek to further the voice of students in the state and federal level government.

NUS has a long history of fighting for progressive reforms in the University & Tertiary education sector that would enable students to have access to an education system that values them based on their passions, not the amount of money in their bank account.

The NUS is established on the principles of student unionism and our primary objectives include amongst many others, working on the interests of students in quality of education, academic freedom, access to education, social security, health and welfare.

Our Executive

President	Bailey Riley	president@nus.asn.au
General Secretary	Sheldon Gait	gensec@nus.asn.au
Welfare Officer	Grace Franco	welfare@nus.asn.au

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?

The Accord must set out a plan for Higher Education Reform in Australia over the next decade. The current system is not working with Universities being more expensive than ever before while at the same time providing students with a lower-quality education & low-quality services. Students are struggling, with more & more having to make the tough decision of showing up to class or showing up for a shift in order to pay their bills.

The Accords need to consider the expectations of students studying higher education. How many hours a week do we expect them to work? How many contact hours a week are we expecting of them? How much extra study should they be doing? What extracurricular activities do we want to encourage them to take up to be best fit for work?

Using these expectations the Accords must provide an ambitious plan on how to support students while they study. There are two ways to look at equity in tertiary education. One is the equity of access and the other is equity while studying. The barrier to higher education for most students is just not being able to pay for your degree, it's the financial security that is essential to be able to complete a degree. If we hope to expand the number of students studying higher education and ensure more low-SES students participate then we need to ensure that the support services offered to these students is adequate & fair.

Investment in Higher education must also come with direct investment in the Students who are completing their studies.

Q14. How should placement arrangements and work-integrated learning (WIL) in higher education change in the decades ahead?

Internships are a requirement for many degrees in Australia. In some courses such as engineering, these are paid but oftentimes, such as social work, they are unpaid. This is an exploitative process where students have to give up paid employment to work hundreds of hours a semester affecting their quality of living and placing financial stress on them. Not only this but the students actually have to pay their universities up to \$7,000 to undertake this work.

How are students expected to live when they have to give up hundreds of hours of paid employment to do unpaid work? Students are expected to support themselves through this period, often for 2-3 months just living off their savings. This is an unrealistic expectation, especially with the rising cost of living and the huge increase in rents across the country.

Paid internships are much more productive. When companies have to pay students they want to make sure that they are maximising each hour for what is most profitable, this usually involves performing genuine work for that organisation. When students are unpaid, companies have no interest in their productivity or investing in their training and often have them performing menial jobs such as fetching coffee to support other staff.

For those internships which are not paid, the government should expand welfare programs to provide a stipend to these students equivalent to at least the minimum wage. This can not be done through Youth Allowance as the rates are too low for any students to live off of and there are huge gaps in which students can access this program in the first place.

Recommendations:

1. Work with universities and employers to expand the number of paid placements/ Internships.
2. Establishment of a government stipend to support students with the cost of living if they have to undertake unpaid programs. This should be equivalent to the minimum wage for the number of hours required
3. Work with universities and employers towards the Removal of PR/ Citizen requirements for WIL. To allow International students to access these programs which are required to complete their programs

Q30. How can governments, institutions and employers assist students, widen opportunities and remove barriers to higher education?

Q31. How can the costs of participation, including living expenses, be most effectively alleviated?

There are two ways to look at equity in education. One is equity of access and the other is equity while studying. The biggest barrier to higher education isn't not being able to pay for your degree- it's the financial security that is essential to be able to complete a higher education degree.

One major challenge facing working students in the Australian tertiary education system is the rising cost of living, particularly in major cities, which forces many students to work long hours to afford rent, food, and other expenses. This can make it difficult for them to devote sufficient time to their studies, leading to lower grades and increased stress levels. Students who work more than 20 hours per week are at risk of lower grades and higher drop-out rates. While some students may need to work longer hours to cover their expenses, policy should be tailored to help students reduce working hours so they can focus on their studies.

The last full study of student poverty found that 2/3rds of students were living in poverty¹ and 1 in 7 were regularly skipping meals² and other necessities in order to survive. Full-time university is now a luxury many students can't afford. This has been exacerbated by youth wages which see students aged under 21 paid less for doing the same work as those older. The Mckell Institute estimated the individual cost of the employee junior rate is \$8,483 per year- amounting to \$3.5 billion per year in lost wages for young people under the age of 21³.

This is compounded by an inadequate welfare system, which locks out 450,000 young Australians from youth allowance⁴, who are under the age of Centrelink independence which is 22 years old. The current parental means test when not

¹<https://www.abc.net.au/news/2013-07-15/majority-of-students-in-poverty2c-research-shows/4821230>

²<https://www.universitiesaustralia.edu.au/media-item/one-in-seven-uni-students-regularly-go-without-food/>

³ <https://mckellinstitute.org.au/research/articles/the-problem-with-junior-pay-rates-explained/>

⁴<https://changetheage.asn.au/wp-content/uploads/2022/10/Locked-out-of-youth-allowance-student-poverty-and-centrelink-in-Australia-1.pdf>

counted as independent is a combined income of \$110,000 per year or two parents earning \$55,000 per year which is under the median wage. This is not a large amount of money and when factors such as divorced parents or, raising siblings are taken into account this is not enough disposable income for a parent to financially support a student. This creates financial insecurity and hinders their ability to complete a higher education degree.

For all 174,000 students on Youth Allowance payments, the rate of Government financial support they are receiving is below the poverty line. The current maximum daily rate of Youth Allowance if you're declared independent and are single with no children is \$14,351 per annum, with an additional rate of \$4,008.60 per annum for rent assistance if you're eligible, totalling \$18,359.60 per annum income. The official Henderson poverty line amount for a single person with housing costs is \$31,786.04 per year, meaning that even at the independent rate of payment with rent assistance students receive income less than 60% of the poverty line.

If those students then choose to work and earn over \$480 per fortnight they are subject to the highest effective tax rate in Australia of 69c (50c deduction + 19c tax rate) per dollar earned. This increases to 79c per dollar above \$575 per fortnight. This high effective tax rate reduces the financial incentive for students to work and can make it difficult for them to cover their expenses. By increasing the rate and reducing the income deductions for working students, they will be able to earn more and continue their studies.

Unpaid internships/ placements are fundamentally flawed, forcing students into financial insecurity to complete hands-on learning parts of their degrees. Some students are required to do up to 10 - 20 week placements, leaving their minimum wage jobs for no pay and facing financial instability. This can be financially unsustainable for students, especially single parents.

Recommendations:

- 1. Increase parental means threshold and include more generous allowances for those who live out of home: To ensure that students from low-income families are not excluded from education. This would allow more students to access Centrelink support and reduce the need for them to work long hours.**
- 2. Reduce Centrelink deductions in line with realistic work expectations**
- 3. Increase the rate of Youth allowance to above the poverty line (to at least \$88 per day)**
- 4. Increase rental assistance in line with average market rates: The current rental assistance rates for students are not keeping up with the market rates for rent. This is especially needed for regional students and those who need to live away from home.**
- 5. Tailor government policy to reduce working hours: Students who work more than 20 hours per week are at risk of lower grades and higher drop-out rates.**
- 6. Ensure placements/ internships are paid either by the employer or a new government welfare stipend. This is so that students who have to give up work to undertake these programs for their course can still afford to live.**
- 7. Abolish Youth Wages**

Q33 What changes to funding and regulatory settings would enable providers to better support students from under-represented groups in higher education?

Q48 What principles should underpin the setting of student contributions and Higher Education Loan Program arrangements?

Principles of Higher education funding

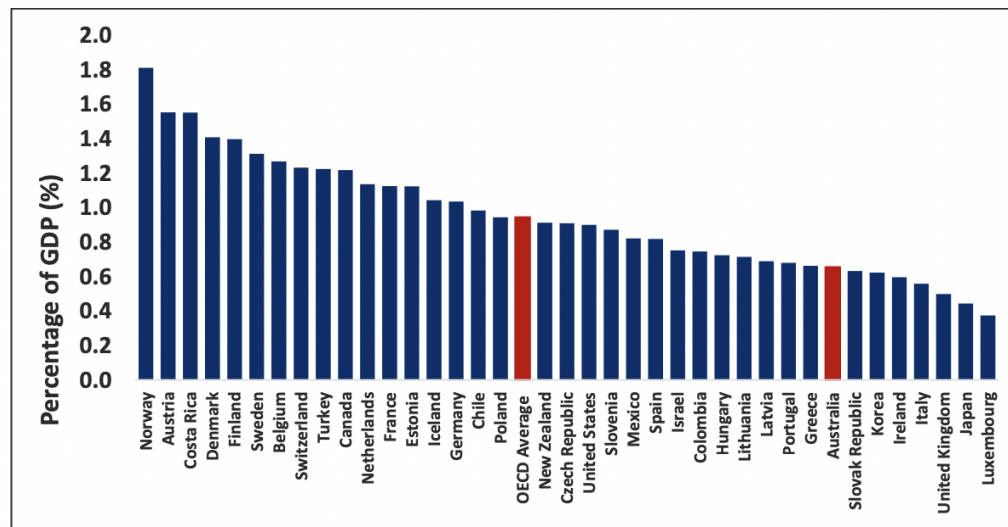
Tertiary education is a public good. Society derives immense benefits by investing in students from filling skill gaps to improving employment prospects and contributing to the growth of knowledge in Australia. Investing in equitable education for all students is an investment in Australia's future.

But since the introduction of HECS, we have placed the financial burden of education on students. Young Australians are looking to be the most indebted generation in history. This lifetime of debt has ruined countless lives and is setting many back by decades. Things that used to be taken for granted, like buying a house or starting a family, are now haunted by the spectre of debt. The Accord presents a real opportunity to prevent this calamity from scarring another generation of students.

Australia's funding for universities does not reflect their central role in society. Relative to the size of our economy, university funding has been in decline since the 1980s⁵. At 0.65% of GDP in 2018/19, Australia's investment shows a significant undervaluation of education, particularly in comparison to international standards.

⁵ Australia Institute report p6

Figure 16: Public spending on tertiary education as a percentage of GDP, 2018/19



Source: OECD (2022) *Public spending on education (indicator)*

The Job ready graduates package reduced government contributions from 58% to 52%, further decreasing the government's relatively low contribution to the sector. However, the pre-JRG status quo is not a satisfactory goal. The government should commit to increasing university funding to 1% of GDP, to bring Australia in line with the OECD average. The increase in funding will allow powerful reforms which can significantly reduce generational wealth inequality and power world-class research.

The Australia Institute estimates that free undergraduate education for all Australian citizens and permanent residents would cost \$3.1 billion per year. This cost could easily be covered if Australia reduced their subsidies of the fossil fuel industry by 30%, acknowledging that Australia's future lies with a young, educated workforce, not with oil and gas. ⁶

More than 2.9 million people have student debt, averaging \$23,685⁷, this is up from \$15,191 in 2012 and will only go up with JRG. It now takes, on average, almost a decade for people to pay off this debt, significantly impacting their economic outlook when they are just starting out in the workforce. It is vital the

⁶ Ai report 52

⁷https://www.aph.gov.au/About_Parliament/Parliamentary_Departments/Parliamentary_Library/FlagPost/2021/November/HELP-2020-21

new government wipes this unnecessary debt, easing generational inequality.⁸ The Greens Election plan to wipe all student debt would cost \$33 billion over the forward estimates and \$60.7 billion over the decade, about a third of the \$184 billion cost of the Stage 3 tax cuts⁹.

Recommendations:

- 1. The government should commit to increasing university funding to 1% of GDP**
- 2. Implement free undergraduate education for all students**
- 3. Wipe student debt**

Enforce the Disability Standards for Education 2005:

Currently, the disability student experience at university is one of rigidity and indirect discrimination, not the flexibility to learning as envisioned by the Disability Standards for Education Act 'the standards.'

The NUS/ Australian Law Students Association ('ALSA')/ Australian Medical Students Association (AMSA) produced the 'Disability and Higher Education' report. This report illustrated the many experiences students have when navigating the complex procedures and staff attitudes to get accommodations for their disability at university. Although the *Disability Standards for Education 2005* (Cth) ('DSE') are supposed to prevent disability discrimination in education, mandating of the *DSE* and implementation thereof have been inconsistent and 'not well understood by education providers'.¹⁰

This lack of understanding only compounds from the power imbalances between disabled students and educational providers. Currently under the *DSE* and the *DDA*, educational providers may seek advice from their own expert staff... as to the kinds of adjustments that could and should be made',¹¹ with the court determining that the teachers, rather than the disabled student and the advice of

⁸ AI report 51

⁹ <https://greens.org.au/news/media-release/greens-plan-wipe-student-debt-instead-stage-3-tax-cuts>

¹⁰ Elizabeth Dickson, 'Disability Standards For Education 2005 (Cth): Sword Or Shield For Australian Students With Disability?' (2014) 19(1) *International Journal of Law & Education* 5, 11.

¹¹ Ibid 7.

the student's supporters, would be the best positioned to determine which adjustment should be implemented.¹² When educational providers and administrators can act as arbiters who understand a disabled person's lived experience more than the disabled person and their treating team, ableist assumptions and faculty attitudes can directly impact the permanence and success of disabled students.¹³

Furthermore, many educational providers have neither undertaken critical disability training and anti-ableist training nor invested in training to develop a 'disability consciousness' among higher education staff,¹⁴ despite the articulated shortcomings of current disability competence training. Although resources such as the National Disability Coordination Officer ('NDCO') Program exist, they are inadequately funded and implemented,¹⁵ further exacerbated by the lack of a Disability Education Commissioner to enforce and monitor the implementation of the Standards and disability policies to destigmatize disability.¹⁶ At significant rates, hidden disability and concomitant stigma are negatively impacting disabled students' interactions with peers and teaching staff,¹⁷ reflecting the 'historically ableist culture of universities'.¹⁸ If we are funding higher education institutions to provide support for d/Disabled students, it has to be done transparently with a mechanism for input from the disabilities community.

¹² Ibid. See also *Sievwright v State of Victoria* [2012] FCA 118 ('*Sievwright*'); *Walker v State of Victoria* (2011) 279 ALR 284 ('*Walker*').

¹³ Ibid. See also Anabel Moriña & Inmaculada Orozco, 'Planning and implementing actions for students with disabilities: Recommendations from faculty members who engage in inclusive pedagogy' (2020) 103 *International Journal of Educational Research* 101639.

¹⁴ See especially Adrienne Doebrich, Marion Quirici, & Christopher Lunsford, 'COVID-19's Impact on the Practice of Pediatric Rehabilitation Medicine: Insights and Recommendations' (2020) 13(3) *Journal of Pediatric Rehabilitation Medicine* 393, 393-401. See also Damian Mellifont et al, 'The ableism elephant in the academy: a study examining academia as informed by Australian scholars with lived experience' (n 18) 1184-1190.

¹⁵ Michelle M Ralston, 'Translating the *Disability Standards for Education 2005* Into Practice' (Doctoral Thesis, University of Newcastle, 2022) 306.

¹⁶ Paul Koshy et al, 'Discussion Paper on the 2020 Review of the *Disability Standards for Education 2005*' (Research Fellowship Final Report, National Centre for Student Equity in Higher Education, 25 September 2022) <https://www.ncsehe.edu.au/wp-content/uploads/2020/09/NCSEHE_Discussion-Paper_DSE-Review_FINAL_230920_20-FINAL.pdf>.

¹⁷ Miriam Edwards et. al., 'Academic accommodations for university students living with disability and the potential of universal design to address their needs' (n 30) 14.

¹⁸ Ibid 4. See also Nicole Brown and Karen Ramlackhan, 'Exploring experiences of ableism in academia: a constructivist inquiry' (2022) 83 *Higher Education* 1225-1239.

Recommendations:

- 1. Establish a Disability Education Commissioner to monitor the implementation of the Standards and the funding of the universities in the Disability Support Program. This Commissioner should be accessible to students and universities to ensure the Standards can evolve with demand.**
- 2. Adopt the National Centre for Student Equity in Higher Education and Curtin University's recommendations in the report "Support Persons with Disabilities to Succeed in Higher Education including:**
 - i. Recommendations 3 and 4: Build a national training strategy so higher education institutions can implement sector-wide, mandatory disability awareness Training.**

Q39 What reforms are needed to ensure that all students have a quality student experience?

Q40 What changes are needed to ensure all students are physically and culturally safe while studying?

Student Money in Student Hands

Student Services and Amenities Fees (SSAF) are fees paid by students to support the provision of non-academic services at universities. These fees are collected by the university and allocated towards various programs including student organisations, to support their programs and services. This funding is negotiated every year in all states except in WA where a legislated minimum percentage of 50% is SSAF returned to these organisations

Currently, the distribution of SSAF to student organisations is uneven, as each year these organisations must negotiate with university management to receive funding. These negotiations create an unequal power dynamic that limits student organisations' autonomy in holding universities accountable.

The NUS fundamentally believes in student money in student's hand's

Student unions and associations are being threatened and defunded all across the country. La Trobe Student Union has had to fight for survival year after year after its funding was cut from \$2.8 million in 2020 to \$275,000 in 2021- devastating the union.

Student unions are essential for universities. The administration of student-run clubs and societies, volunteering programs, leadership opportunities and social events are all the responsibility of strong student unions. Vital support services – including independent advocacy, financial aid, legal services and wellbeing programs like food banks and free breakfasts – are all best managed by the independent student union. And importantly, student unions provide a strong and informed student voice on campus, an important check and balance on university activities to ensure that student interests are being looked after.

Student organisations are run by students, for students, and are better equipped to represent the interests and needs of the student body. Returning SSAF to student organisations allows for greater representation and advocacy for students. Student organisations can prioritise the provision of services and programs that are tailored to the specific needs and interests of the student population.

Kate Ellis released a report in 2008 *The Impact of the Introduction of VSU on Universities and their Students in Australia*¹⁹ the report suggests that the introduction of VSU has had a negative impact on the provision of services and amenities for Australian university students, as well as their ability to participate in university governance and decision-making.

Returning SSAF to student organisations also promotes greater transparency and accountability. Student organisations are required to be transparent about their funding and how they allocate their resources. This accountability ensures that student organisations are responsive to the needs of the student population and are using their resources effectively.

Research suggests that students generally have higher satisfaction levels with programs run by student organisations compared to those run by universities. One study conducted by the University of Tennessee found that students who participated in programs run by student organisations reported higher levels of satisfaction compared to those who participated in university-run programs. Similarly, a study conducted by researchers at the University of Wisconsin-Madison found that students who participated in student organisation-run programs were more likely to feel a sense of belonging on campus and were more likely to continue their involvement in other campus activities.

If SSAF was in students' hands, Universities would still be able to use it for projects but the bargaining power would be put instead in students' hands. The transparency for the use of SSAF would also improve massively. If this had been in place during COVID it would have allowed an increase in assistance to international students who were forgotten by the government. It's important to fund student unions properly so they are able to hire qualified staff to assist the young student unionists who often only have 1-year terms.

¹⁹ <https://www.aph.gov.au/DocumentStore.ashx?id=bbad47e3-1734-4691-be58-503191ad4c51>

Recommendations:

- 1. Institute a national minimum rate in the SSAF legislation
Of 100% that must be returned to student organisations**
- 2. Mandate collection of SSAF from all on-campus students at a higher education provider including International and TAFE students.**
- 3. To change SSAF legislation (higher education legislation amendment (student services amenities) act 2011)) to replace 'higher education provider' apart from 4 subsections p and q and instead replace it with 'democratically elected independent student body' and to add a subsection (t) to read "advocating for students rights and taking to an activist approach to student rights"**

Duty of Care

As per our previous submission, we believe in the creation of a system where students are offered a safe, quality experience both on & off campus. Results from the 2022 National Student Safety Survey show that 1 in 6 students have experienced some form of Sexual Harassment since they have started university with 1 in 30 choosing to make a formal complaint and only 50% of students knowing how to their universities complaint processes work. Since the release of the NSSS results, we have seen minimal work being done in the sector to improve student safety outcomes with many Universities refusing to take part in a second NSSS Survey. These failures fall both on the Institutions themselves and our regulatory procedures that currently do not prioritise student safety. We need a federally mandated Duty of Care system that outlines how Universities must treat student safety and hold these institutions responsible for their failures while creating a space for student voice at the centre of all discussions.

TEQSA, the supposed regulator for the sector, does not deal with individual complaints. Students are therefore thrust into general consumer processes such as state-based ombudsmans who are not up to the task of dealing with the horrific challenge of addressing SASH (sexual assault and sexual harrasment) on campus. TEQSA was also put in charge of implementing recommendations from the 2017 Change the Course survey and it was starkly unqualified and

unmotivated for the task. We saw very little difference in the 2021 National Student Safety Survey which is stark, considering this period included two years of lockdowns.

The National Duty of Care is essential to mandate student voice in long neglected areas that need to be urgently addressed. Reform is sorely needed on Disability, LGBTQIA+, Ethnocultural, First Nations, Residential accommodation and International Student issues. We need a mandated and regulated Code to enshrine, embed and empower the voices of students in the decades worth of change that needs to happen now, before the system crumbles around our ears.

The NUS believes we should institute a Duty of Care replicating New Zealand's Education (Pastoral Care of Tertiary and International Learners) Code of Practice 2021²⁰ as we see it as an excellent indicator of best practice in the Pacific context.

The New Zealand Code was established by Education Minister Chris Hipkins in response to the tragic death of a student in residential accommodation at the University of Canterbury²¹

The whole New Zealand tertiary sector came together to design the permanent Code and took a learner-centric approach that recognised that students are the experts at being students. The Ministry of Education ran an effective consultation process on the Code, informed and led by student voices²². The Ministry also adopted many of the proposed amendments made by the New Zealand Union of Students' Associations (NZUSA)²³ which has led to students being able to "hear" their voices in the final version of the Code.

Once the Code was created, the New Zealand Qualifications Authority (NZQA) co-designed guidance²⁴ on how providers should use the Code to work with students and what the expectations on them were. NZQA adopted frameworks²⁵ designed by NZUSA to hear student voice and build partnership, this has

²⁰https://www.nzqa.govt.nz/assets/Providers-and-partners/Code-of-Practice/Tertiary-and-International-Learners-Code-2021/NZQA_Pastoral-Care-Code-of-Practice_English.pdf

²¹<https://www.rnz.co.nz/national/programmes/the-house/audio/2018801318/how-the-death-of-a-student-changed-the-law>

²² <https://conversation.education.govt.nz/conversations/wellbeing-and-safety/>

²³<https://static1.squarespace.com/static/5f0515b1b1a21014b5d22dd6/t/60b46e06e39ebd5295615de5/1622437384673/NZUSA+Submission+on+Wellbeing+Code+Final.pdf>

²⁴<https://www.nzqa.govt.nz/assets/Providers-and-partners/Code-of-Practice/Tertiary-and-International-Learners-Code-2021/NZQA-Code-2021-Implementation-Guidance-November-2021.pdf>

²⁵ <https://www.students.org.nz/s/Whiria-Nga-Rau-Booklet-English.pdf>

radically changed how students are engaged and partnered with to achieve change in the tertiary sector.

Alongside the Code, New Zealand now has a Dispute Resolution Scheme²⁶ to settle contractual disagreements between students and providers. Under S536(2)(b) of the Education and Training Act, students can also make claims for redress for any loss or harm suffered due to a breach of the Code.

There is a lot of work to be done in instituting student voice within our structures and all university structures: The University of South Australia student association holds best practice in this area at the moment but they have great recommendations for the way it should be held in other universities:

The USASA structure includes:

University Council

- Student President (ex-officio)
- Student Postgraduate Representative (ex-officio)
(Postgraduate Representative is replaced with a student organisation nominated Undergraduate Representative if President is a Postgraduate)

Academic Board

- Five student organisation nominees

Student Appeals Committee (Appeal Body for Misconduct, Academic Integrity and other matters)

- Student organisation nominee

Sexual Assault and Sexual Harassment Steering Group (SASH Steering Group)

- Student President (ex-officio)
- Student organisation nominee

Academic Inquires (Academic Integrity Inquiries, Preclusion Hearings)

- Student chosen from a pool of trained student representatives by the USASA Student Voice team

Student and Academic Policy Advisory Group (SAPAG)

- Student organisation nominee

Safety and Wellbeing Committee

- Student President

Academic Enterprise Oversight Committee (AEOC)

- Student organisation nominee

²⁶ <https://tedr.org.nz/>

Authentic Assessment Steering Group (AASG)

- Two student organisation nominees

Academic Unit Boards

- 7 Academic Units: UniSA Allied Health & Human Performance, UniSA Business, UniSA Clinical & Health Sciences, UniSA Creative, UniSA Education Futures, UniSA Justice & Society, UniSA STEM

Each Academic Unit Board has:

- One elected Undergraduate Representative
- One elected Postgraduate Representative

Academic Student Representatives

- Varying number between courses. Role depends on what feedback and information the course is seeking.

Academic Unit Mental Wellbeing Steering Groups

- Only some units have these steering groups, and they vary in size and purpose

Although USASA holds best practice in Australia, There are many more recommendations to ensure student voice is highlighted through universities around Australia.

Recommendations:

- 1. To Legislate a National Duty of Care with student voice at the centre.**
- 2. To create a National Dispute Resolution Scheme to fill the gap for student grievances and complaints.**
- 3. A minimum of 3 elected student representatives on a University Council (Board or Senate) be enshrined in the governing Act of each institution.**
- 4. A minimum number of student representatives on Academic Boards be set by each and every institution.**
- 5. All faculties or academic units within a university should have a minimum number of elected student representatives on their principal decision-making body. This should be enshrined in policy.**

6. University policies reflect that student representation or participation in decision-making bodies affecting students is the rule rather than the exception. If students are affected by the decisions made by that body they should always be included in these decisions.
7. Student organisations be they associations, guilds, unions or SRCs should be empowered by university management to create ongoing, collaborative projects aimed at training staff and students about student representation on committees and working groups.
8. Universities should be made to provide some form of remuneration to students who are doing the same work as a paid staff member sitting on an advisory or decision-making body. This should not be done in a way that dissuades universities from having students on decision-making bodies.
9. Changes to lower levels of decision-making should not disrupt any organic growth of student representation at a grassroots level and should not take the form of a top-down approach. Any changes made should not leave students worse off than existing arrangements which may be contained in a student partnership agreement or otherwise though minimum representation on higher-level decision-making bodies such as Councils or Academic Boards should not be negotiable.
10. The federal government establishes a task force aimed at the prevention and response to rape on university campuses. This task force will monitor universities' responses to the NSSS survey and have the power to mandate action from universities in response to the sexual assault crisis.

Bureaucratic Systems within Universities

A constant complaint that we hear from students is frustrations with the University's course structure and how inefficient these are in enabling students to properly plan out their academic schedule. Students feel that the fast-paced in & out structure of university lectures & tutorials, combined with how much academics have to manage, leaves them feeling like a gear in a machine. Students want a system that enables them to discuss with tutors & subject coordinators their degree structure, they want services & people who are able to adequately support them in changing a degree or subject & they want the services that are

meant to provide a knowledge base to the universities structures to be well resourced with staff who are capable of managing individual students needs, as opposed to many current systems where they are a “case” passed between the various structures & institutions within the university.

We heard from a student at The University of Sydney who was longing for the connections they had with teachers in highschool which enabled them personalised support *“What I miss about highschool is how easy it was to ask for leeway, I could go up to my teachers and explain my situation. University has made it so hard to get considerations for even the most basic extension”*. One student when asked about the difficulty of the course structure system said that *“It shouldn’t be difficult for me just to figure out how to study honours, I feel that me pursuing further education got lost in a bureaucratic web and it was easier to just enter the workforce”*. Students need support systems within Universities that allow them to strive towards their goals.

There needs to be an immediate change to not hamper students in their education.

Recommendations:

- 1. Students need well funded & well resourced student centres with experienced staff.**
- 2. Students need dedicated case workers who have the time & resources to cater to their personalised needs**
- 3. Special Consideration services, extension requests and special circumstances need to be streamlined across University faculties in an accessible manner**

Universal Design for Learning

Universal Design for Learning/ Universal Design for Instruction/ Universal Design for Education ('UDL') is research-backed as a pedagogy and a curriculum framework, facilitating equitable access to education for all students – including disabled students and other students from diverse, minoritised backgrounds. The aim is allow all students to access their education without depending on the adjustments provided by the *Disability Standards for Education 2005 (Cth)* ('the Standards')

The aim of Standards is to uphold the fundamental rights of d/Disabled students, including the right to education and equality with non-disabled people. The current framework requires students with disabilities to apply for reasonable accommodations to their degree/learning to enable them to participate in their degree and access the services and facilities available to all students. This framework fails the current aims of the Standards and affects student experience.

Whilst participation of d/Disabled students is increasing, we are still less likely to study at university, succeed in university and stay in university.²⁷ Clearly, there are systematic issues at play that over time whittle us down and prevent us from contributing to our fullest potential to society.

The NUS supports the Universal Design of Learning to allow education to be accessible to all regardless of your disability. The core principle of UDL is that education should actively understand differences and seek to promote students by providing multiple ways of depicting information, keeping students interested and allowing them to communicate what they have learnt.²⁸ This goes beyond the standard lecture- tutorial- exam format and allows us to become professionals Australia needs without depending on accommodations that do not work.

Beyond the student experience, Australia could become a leader in technological development through making the materials, information and methods of engagement accessible for students with disabilities.

²⁷ Sue Kilpatrick et. al., 'Exploring the retention and success of students with disability in Australian higher education' (2017) 21(7) *International Journal of Inclusive Education* 751-2.

²⁸ See: CAST *The UDL Guidelines* (web page, 2018) //udlguidelines.cast.org and Sheryl Burgstahler *Universal Design in Education: Principles and Applications* (web page, 2021) <https://www.washington.edu/doit/universal-design-education-principles-and-applications>

Recommendations:

1. Adopt the National Centre for Student Equity in Higher Education and Curtin University's recommendations in the report "Support Persons with Disabilities to Succeed in Higher Education"²⁹ including:

Recommendation 1: Higher Education institutions adopt the principle of UDL. However, the NUS argues the Federal Government should be involved in creating a national standard by collaborating with students, academics and world leaders in disability and UDL.

Recommendation 2 and 4: creating a sector-wide standard of accessible web and materials design in the *Disability Standards for Education*

Hybrid learning:

Online options were 'too hard' before 2020, and then they came within a week, and then they were taken away as quickly as they were given. However, the need of the d/Disabled community to have physically safe spaces does not change. Some of us immuno-compromised and cannot risk exposure to disease, especially when universities do not have open windows, air purifiers or a mask or vaccine mandate in the classroom. Some members of our community are wheelchair users and cannot access rooms, especially when lifts are broken, and they have to miss out on a class.

Moreover, hyflex education can facilitate educational participation for not only disabled people but also people escaping domestic family violence ('DFV') or sexual assault, First Nations students in regional & rural Australia, international students, and other demographics for whom in-person attendance may not be the most safe & accessible.

Likewise, online learning can be better for university staff. University staff with disabilities also face many of the struggles that disabled students do. Likewise, staff with caring roles for children or other dependents benefit from increased access to them by providing education online. Some universities do not have child-care options after 5pm, meaning that staff cannot afford to work a 9-5 with

²⁹ Tim Pitman, 'Supporting Persons with Disabilities to Succeed in Higher Education,' (Equity Fellowship Report, 2022) 60.

children because they have to rush to collect them. The higher education system relies on these staff and their incredible work to upskill the next generation.

However, in-person learning is crucial for many students with disabilities as well. Some of us with mental illness enjoy the social aspect of in-person learning and find it the best way to engage with education. Both options should be available to students to build a safer, engaging university sector for all Australians to benefit and upskill from.

Hybrid learning is a learning concept with so much potential to improve the student experience. The NUS recognises the importance of a quality education that is available to everyone regardless of class, abilities and caring responsibilities. This means that hybrid learning should be available at all institutions so all students can attend the university best suited to their chosen career. Additionally, the university sector is valued for developing knowledge that takes us to the future. From the pandemic to the digitalisation of the workforce, doing both in-person and online learning is the future. The benefits of technology need to be embraced to create the next generation of Australian professionals.

Recommendations:

- 1. Work with stakeholders to develop a well-resourced national standard for hybrid learning and work from home options applicable to all higher education institutions.**
- 2. Remove 8.19 of the Education Services for Overseas Students Act 2000 (Cth) where international students on student visa can only study up to a third of their courses online. Online learning should be available for everyone.**

Q43 How should the current recovery in international education be managed to increase the resilience and sustainability of Australia's higher education system, including through diversification of student enrolments from source countries?

Enrolments

If we are to define the purpose of Higher Education since the industrial revolution it would be for 2 reasons:

- 1) To provide the domestic economy with an educated and productive workforce
- 2) To drive innovation and research to boost the productivity of the economy

If these principles are to be taken as the purpose of Higher Education then it is important to view international students not as temporary residents but as future Australian citizens. This requires a shift in policy and mindset. International student enrolments should not be seen in terms of how to boost university budgets but in terms of how many students we can allow in to best enable them to integrate into Australia and become citizens. Governments and Universities need to ensure that international students are given the support and opportunities they need to integrate into Australian society and contribute to the country's economic and social development. This can be achieved through measures such as providing pathways to permanent residency for international graduates, offering support for language and cultural integration, and promoting employment opportunities for international graduates.

While academic performance is undoubtedly an important criterion, it should not be the sole determinant of a student's eligibility for admission to an Australian university. Instead, universities should also consider other skills and activities that indicate a student's potential to succeed in a globalised and competitive job market.

For example, universities can give weight to extracurricular activities, volunteer work, internships, and other non-academic experiences that demonstrate a student's leadership, teamwork, communication, and problem-solving skills. This

approach would help to attract a more diverse pool of international students, including those who may not have perfect academic records but have valuable skills and experiences that can contribute to the campus community and the wider society.

Moreover, universities should actively seek out partnerships with educational institutions in countries that are currently underrepresented in the Australian higher education market. By developing relationships with these institutions, universities can build pipelines for students from diverse backgrounds to access Australian education, while also promoting research collaborations and other forms of academic exchange.

Overall, diversifying enrolment requires a comprehensive approach that goes beyond academic performance to consider a range of skills and experiences. By embracing this approach, Australian universities can attract a more diverse pool of international students and enhance their resilience and sustainability in an increasingly competitive global education market.

Employment and Placements

According to the Department of Home Affairs, international students on student visas are generally permitted to work up to 40 hours per fortnight while studying in Australia. However, they are not eligible to work in certain industries or occupations, including some types of work that may require permanent residency or citizenship, such as positions in the Australian Public Service or some security-sensitive roles.

Companies may also not allow them to apply for internships or graduate jobs unless they have permanent residency. This becomes a major issue when international students are required to do placements or internships to graduate as it limits the number of opportunities they have.

Even if they find such employment, they may face significant challenges in obtaining permanent residency due to the limited number of places available and the high competition from other skilled workers.

Research by the Mitchell Institute suggests that these restrictions and uncertainties may deter some international students from choosing to study in

Australia, particularly if they are seeking long-term career prospects. For example, a survey of international students conducted by the Mitchell Institute found that 45% of respondents believed that their career opportunities would be better in their home country, while only 24% believed that they would be better in Australia.³⁰

To address these challenges, some experts have called for policy changes that would provide international students with greater access to work opportunities, such as removing the restrictions on the types of work they can do or increasing the number of permanent residency places available to them. These changes could help to make Australia a more attractive destination for international students and increase the resilience and sustainability of its higher education system.

Recommendations:

- 1) Ensure that we clearly outline the principles of international student enrolment.**
- 2) That the principle of international student enrollment should be viewed in terms of how many students can we enrol to best enable them to integrate into Australian society and become citizens.**
- 3) That the criteria for enrolment is broadened and include: extracurricular activities, volunteer work, internships, and other non-academic experiences that demonstrate a student's leadership, teamwork, communication, and problem-solving skills**
- 4) That the Federal Government works with universities and employers to remove barriers for entry into jobs, placements and internships for those students on temporary visas.**

³⁰ <https://www.vu.edu.au/mitchell-institute/tertiary-education/coronavirus-and-international-students>

Q49 Which aspects of the JRG package should be altered, and which should be retained?

As included in our previous submission, NUS believes it has become increasingly evident that Job Ready Graduates is not working as a solution to pushing students into areas of key skills needed. Most experts in the higher education space including academics, vice-chancellors, regulators and unions agree that the JRG package has been a failure and just served as an ideological war by the former government against fields that it did not agree with.

It has not delivered the outcomes of pushing students towards in-demand skills but instead just increased the amount of debt they will graduate with. Key analysis by Mr. Max Young of the University of Melbourne displayed this³¹ showing that increased cost was not a disincentive from studying courses as HECs is not seen as an immediate problem.

The higher education system as it stands is not one that lends itself to lifelong learning. The job-ready graduates created two barriers that need to be immediately removed. The 7-year cap on degrees³² makes longer degrees inaccessible. If a medical student has a 6 year³³ course but they did an undergraduate course in science they would exceed their cap. This is the case for many students that attend the University of Melbourne where an undergraduate Medical or Law degree is not offered so high school students will instead enrol in a bioscience or arts as a pathway. The legislation hurts any student that wishes to go back and do another degree- and when “nine in ten new jobs require post-school qualifications” post-degree learning and the ability to change fields is essential.

³¹<https://www.afr.com/work-and-careers/education/students-ignore-costs-in-choosing-university-study-analysis-20221021-p5brsw>

³²<https://honisoit.com/2021/11/seven-year-time-limit-on-university-degrees-to-affect-most-disadvantaged-students/>

³³<https://go8.edu.au/go8-submission-to-the-australian-government-department-of-education-skills-and-employment-on-the-draft-higher-education-support-student-learning-entitlement-guidelines-2021>

Further, under JRG if you fail 50% of units you have studied you lose your commonwealth-supported place. This has implications for many Disabled students and students living in financial insecurity, especially when we know special consideration at universities is appallingly hard to get. First-year undergraduate students who are still getting a handle on how university life works also have been hit hard by this change.

Ultimately, the Job ready graduates package needs to be reversed.

Recommendations:

- 1. Reverse the Job Ready Graduates package**
- 2. Remove the federally mandated 7-year cap on degrees**
- 3. Remove the federal restriction that you'll lose your CSP if you fail 50% of your units, this should be left to the discretion of universities.**