niversity
AUSTRALIA

CQUNIVERSITY AUSTRALIA SUBMISSION TO THE AUSTRALIAN UNIVERSITIES ACCORD DISCUSSION PAPER

CAIRNS

TOWNSVILLE

NORTHERN TERRITORY

QUEENSLAND

MACKAY

EMERALD
ROCKHAMPTON
GLADSTONE

WESTERN AUSTRALIA

BUNDABERG

BRISBANE

SOUTH AUSTRALIA

NEW SOUTH WALES

PERTH

ADELAIDE

SYDNEY

ACT

VICTORIA

MELBOURNE

TASMANIA

BE WHAT YOU WANT TO BE

cqu.edu.au

VIEW VIDEO FROM PROFESSOR NICK KLOMP,
VICE-CHANCELLOR AND PRESIDENT

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CQUniversity respectfully acknowledges the Traditional Owners of the lands on which we live, work and learn and pays respect to Aboriginal and Torres Strait Islander people as the first peoples, educators and innovators of this country.

A MESSAGE FROM THE CHANCELLOR

As Chancellor of CQUniversity Australia, I am delighted to submit our institutional response to the *Australian Universities Accord Panel Discussion Paper*. The Accord represents a rare chance to fundamentally improve the way higher education is delivered in Australia, and it is critical that our University – a regional university, a dual sector university, but most importantly a university of opportunity – lends its voice to this important discussion.

As the first person in my immediate family to attend university, I understand the difficulties faced by non-traditional students in accessing higher education. I also recognise that I am one of the lucky ones, having had the opportunity to pursue my education and achieve my dreams.

Many others – be they from regional or remote areas, or like me living with a disability, or from Aboriginal and Torres Strait Islander backgrounds – face seemingly insurmountable odds to accessing and engaging in university study. Those that do make it through the doors may not survive past the first year, yet alone cross the stage at a graduation ceremony.

The question we must ask ourselves is: how can we fully remove barriers and ensure that all students, regardless of their background or physical limitations or their situation in life, have equal access to higher education? The Accord represents a once-in-a-generation opportunity to do just that, and I urge us all to seize it.

In our response to the Discussion Paper, we propose a number of recommendations informed by our University mission and values; our unique viewpoint as a regional, national, dual sector institution; and a wide array of data that forms a picture of a sector with room for improvement.

We believe that equity and access should be a theme that runs through all aspects of higher education, from admissions to curriculum development to student support services. We recognise the need for universities to adapt to changing economic and technological conditions, as well as increasing disruption and evolving market expectations, while also promoting social inclusion and equity.

Our recommendations lay out a roadmap for achieving these goals. We propose policy changes that take into account the differential qualities of regional students and universities and recognise the role of regional institutions in affecting positive social change and economic development. Our recommendations are sensible, evidence-based proposals that will add richness and a much-needed perspective to the national discourse arising from the Accord Panel Discussion Paper.

At CQUniversity, we are committed to creating a more inclusive and equitable higher education system. We believe that by working together, we can remove the barriers that prevent so many talented students from realising their full potential and unlock the latent capacity of regional Australia. I thank the Panel for the opportunity to participate in this vital conversation.

Graeme Innes AM
Chancellor, CQUniversity Australia

A MESSAGE FROM THE VICE-CHANCELLOR

CQUniversity has long been a trailblazer in providing world-class training, education, and research opportunities to under-represented groups and under-served communities. Our longstanding commitment to this mission has uniquely positioned us to provide experience and advice on building a higher education system that is equitable and accessible for all.

As a regional university, our mission compels us to build skilled regional workforces, conduct relevant and applied research, and improve the lives of under-represented groups in regional, rural, and remote areas. However, we often face significant obstacles to growth, investment, and social innovation owing to the inherent limitations of our operating environments, further fueling a growing divide between metropolitan and regional areas.

Those who suffer the most from this divide are regional students, and more broadly the talented individuals whose capacity for greatness goes unrealised due to issues of equity and access. When these individuals cannot engage fully in higher education, our nation is all the poorer.

We can make a significant contribution to building a more equitable higher education landscape and a brighter future for Australia. Our institutional response aims to highlight the priorities necessary to ensure the Accord offers the stability and support needed for the Australian higher education sector to thrive, ensuring that all students, regardless of their location or background, have access to high-quality, comprehensive education opportunities.

Through our response, we reaffirm our commitment to providing high-quality education, research, and engagement that supports the development of regional communities.

We recognise that regional prosperity depends on strong partnerships with industry, government and the community, and we are proud to work collaboratively to drive positive change.

The Accord presents a long-overdue opportunity to establish a balance in the Australian higher education system between flexibility, equity, and certainty. It is imperative that the Accord remains nimble enough to adapt to changing trends in higher education, while simultaneously providing clarity for universities to make well-informed decisions about their long-term planning and funding requirements.

To bring this vision to life, the Accord should embody a guiding set of values that reflects the fundamental principle that every Australian, regardless of their background or location, deserves access to the lifechanging benefits of higher education. These values include transparency, recognition of diversity, built-in flexibility, regional prosperity, stability, and consultation.

We are excited about the bright possibilities for the future of the Australian higher education sector, and we are proud to play a part in driving positive change.

Professor Nick Klomp
Vice-Chancellor and President, CQUniversity Australia

ABOUT CQUNIVERSITY

CQUniversity Australia has come a long way since its inception as the Queensland Institute of Technology (QIT) Capricornia in Rockhampton, back in 1967. The University was granted full university status in 1992 and has since grown to become one of the largest universities based in regional Australia, with a strong presence across the entire country.

CQUniversity is proud to be recognised as Australia's most inclusive university, with a commitment to access and participation that defines itself by who it embraces, rather than who it excludes. This approach has seen the University become a pioneer in the delivery of distance education, with over 50 per cent of the current student cohort studying off-campus, many of whom are based in rural and remote areas. CQUniversity's flexible approach to learning and teaching, and continued innovation in this space, has provided opportunities for thousands of students to complete qualifications, regardless of their geographical location or personal circumstances.

With over 30,000 students studying online and on-campus across Australia, CQUniversity delivers more than 300 education and training offerings, from short courses and certificates, through to undergraduate, postgraduate and research degrees. Study areas include apprenticeships, trades and training, business, accounting and law, creative, performing and visual arts, education and humanities, engineering and built environment, health, nursing, information technology and digital media, psychology, social work and community services, science and environment, and work and study preparation. CQUniversity is Queensland's only dual sector university, with a commitment to providing world-class higher education and training to all students.

CQUniversity is also renowned as a research institution, with a focus on impact and real-world outcomes. The University has achieved Excellence in Research Australia (ERA) results of 'at', 'above' or 'well above'

world standard in 22 categories of research, including Mathematical Sciences, Applied Mathematics, Horticultural Production, Engineering, Psychological and Cognitive Sciences, Psychology, Agriculture and Vet Sciences, Agricultural, Land and Farm Management, Public Health and Health Services and Nursing, among others.

CQUniversity's commitment to engagement and social advancement has led to several key partnerships with communities, industry, and government, both in Australia and overseas. The University has been recognised as Australia's first and only Changemaker Campus by Ashoka U, and Australia's only certified social enterprise university by Social Traders.

CQUniversity has a strong alumni community, with more than 120,000 alumni across the globe. Graduates of CQUniversity also have some of the best employment outcomes in Australia, with official data consistently indicating above-average national undergraduate and postgraduate employment outcomes. Data released by the Quality Indicators for Learning and Teaching (QILT) also shows that CQUniversity outperforms most other Australian universities when it comes to the overall student experience and graduate salary outcomes.

CQUniversity's unique vision for diversity, outreach, engagement, research, learning and teaching, and inclusiveness - combined with its growth aspirations and continued expansion of student success, research excellence, social innovation and community engagement - has led to it being recognised within several world university rankings including Times Higher Education and QS World University Rankings.

CAIRNS
Gimuy Walubara Yidinji and Yirriganydji

TOWNSVILLE
Bindal and Wulgurukaba

MACKAY
Yuibera

QUEENSLAND
RUC
Dirranbandi, Maranoa,
St George

EMERALD
Western Kanagoulu

ROCKHAMPTON
Darumbal

GLADSTONE
*Bailai, Gurang,
Gooreng Gooreng
and Taribelang
Bunda peoples*

BUNDABERG
*Bailai, Gurang, Gooreng Gooreng
and Taribelang Bunda peoples*

BRISBANE
*Turrbal, Jagera, Yuggera
and Ugarapul*

NEW SOUTH WALES
RUC
Broken Hill, Cooma, Goulburn,
Grafton, Griffith, Kempsey, Leeton, Moree,
Narrabri, Parkes, Southern Shoalhaven, Taree

SYDNEY
*Gadigal of the
Eora Nation*

NORTHERN TERRITORY

WESTERN AUSTRALIA
RUC
Geraldton, Karratha,
Port Hedland

SOUTH AUSTRALIA
RUC
Berri, Kadina, Murray Bridge,
Port Augusta, Port Pirie

PERTH
Wadjuk

ADELAIDE
Kaurna

ACT

VICTORIA

MELBOURNE
Kulin

RUC
Hamilton
Wonthaggi

TASMANIA

Campus

RUC Regional University Centre Partnership

In teach-out mode, supporting current on-campus students and accepting online applications for 2022 onward.

Italicised: Traditional Owners

2 Multiple locations per city are indicated with a number.

CQUNIVERSITY AT A GLANCE

30 000+ STUDENTS AND 3 000+ STAFF[#]
We're dedicated to growing and supporting our diverse student and staff community.

CHANGEMAKER CAMPUS
We're recognised as Australia's first and only Changemaker Campus by global social innovation group Ashoka U.

RANKED #83 GLOBALLY FOR SUSTAINABILITY IMPACT
Our commitment to the United Nations' Sustainable Development Goals is recognised in Times Higher Education's annual Impact Rankings.

5 STARS FOR TEACHING QUALITY
Our small class sizes and excellent student feedback sees our teaching staff recognised nationally and globally.^

#1 IN QUEENSLAND FOR GRADUATE EMPLOYER SATISFACTION
The QILT Employer Satisfaction Survey 2021 shows our graduates are highly-regarded by employers.

WORLD-CLASS RESEARCH
We're conducting research rated as 'at', 'above', or 'well above' world standard in 22 research categories.*

ACADEMIC ACHIEVEMENTS
We recognise excellence with 130+ academic prizes awarded annually.

COMMUNITY PARTNERSHIPS
Over 150 organisations donating through philanthropic partnerships contributing to CQU research, student support and outreach programs.

*State of Australian University Research 2018-19: ERA National Report.
#This figure includes fixed-term, permanent and casual staff.
^QS Stars Rating System 2021

SUMMARY OF KEY RECOMMENDATIONS

Throughout the following submission, CQUniversity makes a series of recommendations in response to the questions posed in the Australian Universities Accord Discussion paper.

In summary, we recommend that:

1. All policy initiatives arising from the Accord generate net positive outcomes for regional Australia, through the establishment of a Universal Higher Education Service Obligation Framework.

2. The Accord includes the development of a comprehensive strategy to support the future of Australia's higher education sector, with a clear focus on supporting and addressing regional skills demand.

3. As per the recommendations of the Bradley Review of Australia Higher Education, a national strategy for improving higher education attainment amongst under-represented student groups be developed. With the aim of achieving parity with national attainment rates in the long term, the strategy should include the development of attainment targets for under-represented student groups, with respective targets applied to each cohort.

4. The strategy for improving under-represented student cohort attainment rates should be supported through the:

   » reinstatement of demand-driven student funding/places at regionally headquartered universities;

   » creation of demand-driven student funding/places in enabling courses for equity group cohorts, at regionally headquartered universities, to support student preparedness and success; and

   » restructure of the funding allocations for subsidised equity support provisions, such as the Higher Education Participation and Partnerships Program (HEPPP) and the Indigenous, Regional and Low SES Attainment Fund, away from an EFTSL basis to a head-count basis and ensure the funding pool adequately addresses the significant and additional support costs these students attract.

5. A review of the funding mechanisms developed under the Job Ready Graduates package be undertaken with the view to:

   » ensuring that growth and attainment rate targets are sufficiently funded under any new policy;

   » ensuring student contribution amounts are not used as a means of signaling student choice through pricing.

6. The discrepancy between the indexation rates used in funding envelopes and the actual real-time indexation that is determined via lag-data be addressed, as this impacts the ability of universities to respond to rising delivery costs.

7. The Accord be intentionally geared towards fostering enduring policies, strategies, and financial structures that sustain agreed objectives to increase access, participation, attainment, and productivity.

8. Funding arrangements to better support Research Higher Degree students are reviewed. This structural change must focus on acknowledging the diverse needs of candidates across different institutions, support growth in graduate research training, and ensure candidates are adequately supported through to completion.

These recommendations have been developed to maximise positive outcomes for all, while still ensuring that the Accord does not unintentionally detract from the prosperity of regional Australia.

9. Regional universities are supported to meet their current and future infrastructure needs by:

   » reinstating the Education Investment Fund, either solely for smaller and/or regional institutions, or with a dedicated funding round exclusively for regional university infrastructure;

   » quarantining an agreed percentage of the ARC's Linkage Infrastructure, Equipment and Facilities funding scheme for regional institutions to address the significant disparity in past funding outcomes between metropolitan and regional universities;

   » ensuring that future university infrastructure funding mechanisms include provisions for regional universities' digital infrastructure needs (including cybersecurity) and ongoing infrastructure maintenance costs; and

   » including regional universities in the eligibility criteria for regional infrastructure grant pools.

10. The comprehensive status of regional universities is to be protected, as acknowledgement of the significant contribution regional universities make to innovation and discovery, particularly in partnership with regional industry.

11. The diversity of research activity across the sector is recognised which, for regional institutions, is often aimed at the applied research needs of their communities.

12. A seamless and integrated post-schooling education continuum is established and considers:

    » extending the self-accreditation status of Australia's six dual sector universities to include vocational education courses; and

    » expanding the national regulatory and quality assurance agency to cover the entire tertiary sector (including vocational education and training and higher education).

13. Student subsidies and funding agreements for VET courses be standardised across State and Commonwealth, including the introduction of funding VET student subsidies on enrolment rather than completion, in a similar manner to that of higher education.

14. Vocational Education and Training be resourced on an equal footing to higher education and the number of private 'for-profit' RTOs accessing the public purse should be reduced.

15. VET students enrolled in Certificates III and IV are provided access to Commonwealth supported student loans.

16. A reporting framework that reduces overlap and creates efficiencies in the cost of reporting and compliance is established.

ACCORD FOCUS AREA 1:
A REGIONAL RESPONSIBILITY

THIS FOCUS AREA ADDRESSES AUSTRALIAN UNIVERSITIES ACCORD DISCUSSION PAPER QUESTIONS 1, 2 ,4, 5, 6, 7, 8, 34, 35

RECOMMENDATION

All policy initiatives arising from the Accord generate net positive outcomes for regional Australia, through the establishment of a Universal Higher Education Service Obligation Framework.

Although it is a cliché, it bears repeating that regional Australia is vastly different from metropolitan Australia. More than 30 per cent of Australians live in regional areas, but these areas have significantly lower population densities, lower levels of education and often lower levels of economic activity than metropolitan areas.

Regional universities, like CQUniversity, operate under a distinct social charter to develop highly skilled regional workforces, to deliver applied world-class research and innovation outcomes for regional industries, and perhaps most importantly, to lift the educational participation, retention and attainment rates of traditionally under-represented student cohorts. Despite this commitment, the gap between metropolitan and regional Australia – as it relates to relative proportionality in the social benefits of educational attainment, workforce development, research impact, and investments in tertiary infrastructure – continues to grow wider. Addressing this disparity, which negatively affects some 7.8 million Australians, should be a key focus for the Universities Accord.

CQUniversity is of the firm view that the introduction of the Universities Accord must represent a net positive outcome for regional Australia. Any policy, legislative or funding instruments introduced as part of the Accord must not detract from the prosperity of the regions, or disincentivise opportunities for students to enrol in regional institutions. Moreover, there should be an agreed position that all Australians, regardless of their location or background, deserve the same standard of educational experience, including digital infrastructure, physical infrastructure, research capacity, and learning. In a similar approach to the telecommunications sector, the Commonwealth should seek to establish a Universal Higher Education Service Obligation framework and appropriate whole-of-government approaches and funding mechanisms to facilitate this commitment.

Australia's regional universities are anchor institutions that play a vital role in contributing to regional prosperity. These institutions serve not only as centres of learning, but also as engines of economic growth and development, contributing an estimated $2.1 billion in economic activity each year and supporting more than 16,000 jobs.[1] Regional universities are often among the largest employers in their respective towns and regions and make a significant contribution to Gross Regional Product (GRP).

Amid historically high skills shortages, regional universities are more likely to offer courses in fields that are particularly relevant to regional skills needs, including agriculture, health and education.[2] Regional universities often collaborate with industry to develop and deliver programs that are directly tailored to addressing local skills needs,[3] and are more likely to offer work-integrated learning placements than their metropolitan counterparts.[4]

Regional Australians seeking education opportunities do not operate on an even playing field. The Accord must recognise this through the implementation of meaningful, long-term higher education policy and funding settings that provide greater regional benefits.

Regional institutions also contribute to the ongoing professional development of regional workforces, helping these workforces to acquire new skills and knowledge and to remain in the regions.[5]

Importantly, regional universities hold a special place in the hearts of regional communities Australia-wide. People in regional centres from Rockhampton to Armidale, and Toowoomba to Ballarat are proud to hail from a "university town" and communities take a sense of ownership over their local institutions. Our regional institutions represent the only choice for many local people looking to access an in-person higher education course. Relocating away from family, friends, dependants and financial supports to study in a city is simply not an option for many regional Australians. This is in stark contrast to the cities, where higher education options (not limited to universities) are plentiful, and where the closure or recategorisation of a single university would not be disastrous for the wider community.

Operating a university in a regional area, however, presents far more challenges than it does in the cities. With thin domestic student markets and lower international student demand, regional university revenue is constricted by location, despite rising fixed costs. These reduced economies of scale (not to mention the higher cost of attracting academic talent, and more costly student support needs) mean the per-head cost of delivering education is significantly higher. These challenges are detrimental to regional student access and participation.

ACCORD FOCUS AREA 1:
A REGIONAL RESPONSIBILITY

RECOMMENDATION
The Accord includes the development of a comprehensive strategy to support the future of Australia's higher education sector, with a clear focus on supporting and addressing regional skills demand.

A key issue in determining future demand and supply of higher education is clarity on exactly what demand "problem" Australia's higher education sector is attempting to address, and on what basis it should be funded. Satisfying student demand, improving access or attainment levels, addressing the regional inequities of tertiary participation, meeting the future human capital needs of Australia's workforce, and addressing employer skills shortages in particular areas are all distinct issues.

Meeting region-specific education needs and skills shortages adds a further level of complexity, as does the question of how much of Australia's human capital needs should be met through domestic higher education and how much should be met by retention of overseas students in Australia or using Australia's skilled migration program. The need for upskilling, life-long learning, and professional development as individuals progress through their careers (and how much of those needs should be met by the higher education sector) is another question again.

The Accord Discussion Paper does not clearly engage with the nuances of these questions, yet to build a comprehensive strategy for Australia's higher education sector, questions such as how much growth to fund

within the sector, and how that growth should be prioritised and resourced, will need to be captured within a comprehensive vision and framework.

The Job Ready Graduates Scheme (JRG) is an example of the results of failing to engage in such planning. The JRG promised to provide Australia's higher education sector with funding for 96,000 additional Commonwealth funded places by 2030. However, analysis by Warburton (2021) indicates that 72,400 of those places will be required just to service Australia's population growth and maintain participation rates at their pre-Job Ready Graduates levels.

In order to meet the higher education attainment goals outlined in the National Regional, Rural and Remote Education Strategy (halving the 2016 disparity in metropolitan and regional/remote bachelor degree attainment rates amongst 25-34 year olds by 2030), a further 85,000 additional (regionally-based) bachelor degree graduates will be required by the end of the decade, even under the unlikely assumption of no further growth in metropolitan attainment rates. Achieving the stated goals of improving national higher education attainment levels and addressing the disparities in regional/remote and metropolitan attainment, within the current funding framework, is simply not possible. Just maintaining attainment rates in metropolitan Australia while simultaneously addressing the disparities in metropolitan and regional/remote bachelor degree attainment rates will require an expansion of Australia's higher education sector, well beyond what was allowed for under the JRG funding mechanisms.

A clear strategy for how the tertiary education sector can support Australia's current and future regional skills demand, and how this will be appropriately funded, is sorely needed if we are to maintain national productivity and workforce capacity.

ACCORD FOCUS AREA 2:
EQUITY, ACCESS AND ATTAINMENT

THIS FOCUS AREA ADDRESSES AUSTRALIAN UNIVERSITIES ACCORD DISCUSSION PAPER QUESTIONS 3, 9, 10, 11, 12, 28, 29, 33

RECOMMENDATION

As per the recommendations of the Bradley Review of Australia Higher Education, a national strategy for improving higher education attainment amongst under-represented student groups should be developed. With the aim of achieving parity with national attainment rates in the long term, the strategy should include the development of attainment targets for under-represented student groups, with respective targets applied to each cohort.

The disparity in educational participation and qualification attainment between regional and metropolitan Australia, and the stronger demand for skilled workers in regional, rural and remote (RRR) locations, indicates that Australia's regional communities contain the greatest concentration of untapped economic potential at a national level. Unlocking this potential via dedicated efforts to boost regional higher education participation will deliver benefits to all Australians.

On average, graduates with a bachelor-level qualification earn an additional $142,000 in post-tax earnings over their lifetime ($674,000 when undiscounted), compared to Australians without a formal post-school qualification.[6] This exemplifies the power of regional higher education in providing regional Australians with the ability to unlock a more prosperous future for themselves and their families. The pronounced gap in higher education attainment

between regional and metropolitan Australia means there are effectively "two Australia's" – one of which is close to world-leading in education attainment and lifetime earnings, and one which is unrepresentative of what you'd expect from any modern, advanced economy.

Growing regional Australia's higher education access and attainment rates remains a challenge for the sector, and for Australia as a whole. The challenge was first identified as a cause for concern in the Dawkins report of 1990[7] and has been a continuing theme in major reviews ever since. Regional access and attainment is not just important for students who want to access higher education, but for ensuring that regional communities have access to sufficiently skilled workforces to survive and prosper in a modern, service-based economy.

A skilled, regionally relevant workforce will become increasingly important to Australia in responding to future global and national challenges. While productivity growth is expected to be a key enabler to Australia's future economic growth, regional and remote Australia continues to lag metropolitan Australia in access to and attainment of the skills and education levels necessary to drive that future growth and adequately address regional challenges.[8] The growth and retention of a regionally relevant, educated workforce in regional/remote Australia to meet these and other challenges should be a key focus for Australia's higher education sector.

BARRIERS MUST BE REMOVED TO EMPOWER STUDENTS TO FIND NOT JUST A JOB BUT A REWARDING CAREER

Michelle Prizeman's study journey was not always an easy one, but adversity has never stopped the dedicated CQUniversity alumnus from reaching her goals.

When Michelle found herself living in a women's shelter alongside her two young children, she said she was grateful for her studies in helping her overcome one of the most challenging times in her life.

Determined to provide her family with a stable home, Michelle said she focused on the most important aspects of her life - her kids and career goals.

Michelle enrolled in the Bachelor of Occupational Health and Safety at CQUniversity, taking advantage of the support and flexibility to juggle work and full-time study, while raising her children.

Through her hard work, Michelle successfully secured full-time work in the industry while completing her degree. Michelle credits her qualification for helping to set up a life-changing future for her and her family.

The data on higher education attainment in Australia presents a positive outlook overall, but masks a significant inequality for those living in regional areas. On the surface, our nation's attainment rate of 41.5 per cent for people aged 24-35 – above the Bradley Review target, above the OECD average, and 11th in the world, nestled between Norway and Switzerland – should be a point of pride. However, inner regional Australia's attainment rate (26.9 per cent) ranks closer to Mexico.[9] For a third of our population, attainment rates are akin to those of the developing world, and this is cause for significant concern. It should also be noted, that this educational disparity is in stark contrast to the proportion of Australia's GDP produced in these same regions. There is a disconnect between the regions that generate much of our nation's wealth, and where the educational benefits of that prosperity flow.

ACCORD FOCUS AREA 2:
EQUITY, ACCESS AND ATTAINMENT

The challenge of lagging regional and remote access rates and potential strategies to address them have been discussed extensively in sector-wide reviews such as Backing Australia's Future (2003) and the Bradley Review (2008), and in more focused reviews such as the Review of Regional Loading (2011) and the National Regional, Rural and Remote Education Strategy. All these Reviews have made policy recommendations in terms of improving access for regional/remote students, building aspirations for tertiary study amongst regional communities, providing financial and other support for disadvantaged regional/remote students, and strengthening the development of a comprehensive post-secondary education system in regional Australia. These recommendations have had mixed take-up; while higher education access and attainment has grown modestly in regional/remote communities, it has continued to grow at a much lower rate than in metropolitan Australia. As a result, the disparity between higher education access and attainment rates between regional/remote and metropolitan Australia has in fact increased over time, despite it being a specific recommendation of the National Regional Remote and Rural Higher Education Strategy to attempt to halve the 2016 disparity in higher education attainment by 2030.

If people in regional Australia enjoyed the same share of bachelor-level qualifications as in metropolitan areas, there would be more than 461,000 additional university graduates living and working in regional Australia, collectively earning about $26 billion each year, based on average graduate salaries.[10] Modelling indicates that each percentage point increase in higher education attainment – equivalent to around 50,000 additional higher education-qualified workers – is associated with a 0.09 per cent increase in GDP per annum, representing $1.8 billion in additional economic activity annually.[11] If regional Australia achieved bachelor-level educational attainment parity with metropolitan Australia, the 461,000 additional regional graduates could generate an annual boost in GDP worth an additional $16.5 billion.

CQUniversity requests that the Accord Panel be mindful of Australia's two-speed system of higher education attainment as it exists between metropolitan and regional Australia, and to resist an undifferentiated 'one-size-fits-all' approach to policy and target setting. Although the Accord Discussion Paper's assertion that "the target set by the Bradley Review of Australian Higher Education attainment has been met", it masks the reality of low regional attainment, which actually sits at just 26.9 per cent and 21.1 per cent for inner and outer regional Australians respectively. Outcomes are even worse for regional Australians from low socioeconomic, remote or First Nations backgrounds.

Now is not the time for complacency. We must apply the Bradley Review attainment targets for under-represented cohorts in the first instance, then aim for parity of future attainment rates in regional and metropolitan Australia. In doing so, we must create policies that are informed by these targets and the national inequalities, and encourage greater higher education participation for under-represented Australians.

It is also important to acknowledge the lost potential to regional Australia of regional students relocating to metropolitan campuses for their studies. Policy that actively incentivises the drain of regional academic talent to the cities will only worsen the educational disparities of regional Australia. While regional student choice must be preserved, and the successes of these students celebrated regardless of degree location, it is a net loss for regional communities to see their talent pools hollowed out by the relentless pull factors of metropolitan Australia. We also know that four out of every five regional students who relocate to a major city to study never return to the regions after graduation.[12] In contrast, of the students who graduate in the regions from a regional university, 70 per cent go on to remain living and working in regional, rural and remote Australia after graduation, enriching communities and economies while suppressing the widening of city/country skills disparity.[13]

Regional Australia is primed for realising the socioeconomic dividends from increased tertiary education attainment. Access to high quality, equitable educational opportunities is a foundational prerequisite to achieving sustainable employment, productivity, and wage prosperity at a national, community and individual level. We must resist the emergence of a two-speed system of educational outcomes that has the potential to undermine the reputation of Australia's higher education ecosystem.

RECOMMENDATION

The strategy for improving under-represented student cohort attainment rates should be supported through the:

» **reinstatement of demand-driven student funding/places at regionally headquartered universities;**

» **creation of demand-driven student funding/places in enabling courses for equity group cohorts, at regionally headquartered universities, to support student preparedness and success; and**

» **restructure of the funding allocations for subsidised equity support provisions, such as the Higher Education Participation and Partnerships Program (HEPPP) and the Indigenous, Regional and Low SES Attainment Fund, away from an EFTSL basis to a head-count basis and ensure the funding pool adequately addresses the significant and additional support costs these students attract.**

Appropriate funding to support students from equity backgrounds must be a key object of the Accord process because current funding mechanisms to support students from equity backgrounds are flawed and inadequate.

This view is informed by a range of sources including quantitative data provided by the Department of Education, such as comparative regional/metropolitan access, participation and completion rates, and the University's own experiences in course delivery to equity students. These students – whether their background is low socioeconomic status, First Nations, first in family, remote/regional, or some combination of equity factors – face numerous challenges, and effectively supporting these students comes with significant financial cost to the University.

One of the factors that differentiates CQUniversity from most other Australian universities is the extent to which servicing students from different equity backgrounds is core business.

Based on the Department's 2021 Student Dataset:

» **70.4%** of CQUniversity's domestic undergraduate students had a Regional/Remote First Reported Address (the 2nd highest regional/remote participation rate of any Australian Table A provider);

» **38.14%** of domestic students had a First Reported Address in a Low SES SA1 Region (the highest Low SES participation rate of any Australian Table A provider);

» **4.91%** of all domestic students identified as Indigenous Australians (the 3rd highest Indigenous participation rate of any Australian Table A provider);

» **7.06%** of all domestic students identified as living with a disability;

» **1.47%** of all domestic students identified as being from a Non-English Speaking Background.

Whilst the analysis in the Accord Discussion Paper on the cost of supporting students from equity backgrounds is noted, it is the experience of CQUniversity that decisions regarding investment in supporting equity students are based on a range of factors, including the funding made available to the institution to support those students.

More than 90% of the University's domestic undergraduate students are from an equity background, and a large number of students identify with two or more categories of disadvantage.

ACCORD FOCUS AREA 2:
EQUITY, ACCESS AND ATTAINMENT

The costs of delivery to low SES and regional/remote students are considerably more than "mainstream" students, but current funding mechanisms do not allow institutions (such as CQUniversity) with a high proportion of equity enrolments to invest anywhere near the amounts needed to support those students.[14] CQUniversity would argue that recent suggestions that economies of scale may exist in supporting delivery to large equity cohorts are not correct; data and experience instead suggest that current funding mechanisms limit the additional financial support that institutions with large equity cohorts can dedicate to supporting those students.

To provide additional support to these students, in 2021 CQUniversity was paid $6,225,486 in Regional Loading and $5,587,401 via Higher Education Participation and Partnerships Program (HEPPP). That Regional Loading revenue equated to 2.26 per cent of CQUniversity's combined Commonwealth Grant, HELP and HECS-HELP revenue for 2021. Revenue from the Higher Education Participation and Partnerships Program equated to 2.03 per cent of the University's Commonwealth Grant, HELP and HECS-HELP revenue.

Fully funding the additional costs of delivery to students from regional/remote backgrounds identified in the Transparency in Higher Education Expenditure report would require CQUniversity's Regional Loading funding to be increased by somewhere in the region of 140 per cent (to cover the 7.7 per cent cost differential associated with regional delivery identified by Deloitte in 2020,[15] applied to 70.4 per cent of CQU's current domestic undergraduate cohort).

Applying CQUniversity's 2021 HEPPP funding to the 38.14 per cent of CQUniversity students from low SES backgrounds indicates that low SES students are funded on average 10.23 per cent more than the University's medium and high SES students, but the cost differential suggested in recent studies[16] for servicing these students is in the order of 300 to 500 per cent. Fully funding that cost differential would require an increase in CQUniversity's HEPPP funding from just under $5.6 million (based on 2021 actuals) to somewhere in the region of $164 million to $273 million.

CQUniversity accepts that funding increases of that magnitude are unlikely to eventuate from the Accord process, but the analysis serves to highlight the inadequacy of current funding mechanisms for supporting equity students. It also provides an explanation as to why different outcomes occur at different institutions, particularly the attrition and completion rates of equity cohorts.

Due to a lack of dedicated funding, delivery to equity students at a practical level involves extensively subsidising the cost of support to those students from other funding sources. This is particularly prevalent at regional universities. While such cross-subsidisation may be possible for institutions where equity students are a relatively small proportion of the institution's total enrolments, regional universities with high proportions of equity enrolments simply cannot afford to do this within current funding mechanisms. For example, to fully realise the $109,430 per EFTSL cost outlined in recent papers[16], supporting low-SES delivery would cost CQUniversity more than $381 million based on its 2021 student load. This equates to approximately $105 million more than its total combined Commonwealth Grant, HELP and HECS-HELP revenue for the 2021 calendar year.

Further complicating matters, the funding allocated to the sector via Regional Loading and HEPPP is capped, and this funding is not directly linked to student enrolments.

For example, Regional Loading funding is based on a set dollar amount being allocated to the sector as a whole, with the set funding envelope being distributed between providers based upon their share of the sector's equity enrolments. Perversely, this means that if regional/remote enrolments increase across the sector, which is a stated aim of the National Regional, Rural and Remote Education Strategy and the Job Ready Graduates Scheme, the capping of funds available for distribution means that the revenue distributed per enrolment decreases – effectively reducing the per student dollar amount available to support an expanding equity cohort.

CQUniversity is of the firm view that Commonwealth funding to grow places to support equity enrolments should fall under a demand-driven places policy and, given the nature of regional universities' student profile, this demand-driven policy should be restricted to regionally headquartered universities to ensure it does not unintentionally create a policy setting whereby metropolitan universities are incentivised to draw students out of the regions to study in the major centres, thereby exacerbating the regional skills shortage currently inhibiting our national prosperity.

Enrolment data from the Department of Education's 2021 Student Datasets demonstrate how the discontinuation of demand driven funding negatively affected student commencements across a range of student equity groups.

Equity Group Enrolments following the Removal of Demand Driven Funding
Commencing Bachelor Degree Students at Table A Providers 2016-21

	2016	2017	2018	2019	2020	2021
ASGS Regional First Address	54,194	52,860	51,150	49,041	46,501	47,150
ASGS Remote First Address	2,245	2,316	2,125	2,163	2,014	1,980
Low SES First Address	44,480	44,839	43,990	42,032	41,484	40,719
Non-English Speaking Background	10,495	10,423	9,647	9,067	9,090	8,562
Students Living with a Disability	14,262	15,591	16,510	16,754	17,580	24,258
Indigenous Students	4,800	4,987	4,941	5,122	5,271	5,377

ACCORD FOCUS AREA 2:
EQUITY, ACCESS AND ATTAINMENT

The data clearly show that bachelor degree commencements from key equity groups such as regional/remote students, low-SES students, and students from non-English speaking backgrounds have declined since demand driven funding was discontinued. CQUniversity understands that several factors have contributed to that decline, including the impact of the policy change signalling to potential equity students that the opportunities for admission to higher education would be more limited. This signalling has affected the enrolment decisions of equity students and others who are less self-assured in their capacity to excel in an academic environment. Furthermore, the investments made by regional universities in new courses and facilities designed to accommodate unmet demand were undermined and left partially stranded by the premature recapping of student places in regional Australia, representing lost opportunity for institutions whose investment capacity is already limited by diseconomies of regional scale. While there may be an argument that higher education attainment levels are at, or were approaching, saturation levels in metropolitan areas, the experience in regional Australia is one of high scarcity and demand for tertiary qualifications.

In addition to the need to return to a demand driven funding model to support students enrolled at regionally headquartered universities, a bold policy would be the application of an equity weighting to the Commonwealth Contribution amounts paid to institutions to reflect the costs of delivering to students from equity backgrounds. Models like this exist elsewhere in the system - for example, with research block grant funding for graduate research, where weighting is applied for Indigenous student completions.

Such a model might see the Commonwealth Contribution amount paid under the Commonwealth Grant Scheme incorporate the addition of a loading depending on the number of equity identifiers, with the equity weighting of a student enrolment being calculated by:

» Funding Cluster Amount (only) if the student enrolled in a unit meets no equity criteria.
» (Funding Cluster Amount + equity weighting %) if the student enrolled in a unit meets one equity criteria.
» (Funding Cluster Amount +2x the equity weighting %) if the student enrolled in a unit meets two equity criteria.

**COMMONWEALTH
CONTRIBUTION PER STUDENT**

=

**FUNDING CLUSTER AMOUNT
(DISCIPLINE BASED)**

+

**APPLIED EQUITY WEIGHTING OF
STUDENT ENROLLED** (THERE MAY BE MORE
THAN ONE EQUITY WEIGHTING APPLIED)

As noted in the Accord Discussion Paper, estimates of the additional cost incurred in supporting equity enrolments vary considerably, and would require further analysis before a definitive model was finalised. However, an important underlying principle would be that neither the underlying Commonwealth supported places nor the equity weighting attached to them should be capped. The increased national productivity obtained through greater regional participation, and the higher tax paid by regional Australians earning higher wages, would more than cover the treasury risk of these uncapped allocations.

Such a mechanism would recognise that the cost of academic delivery to students varies depending on factors other than just the academic discipline involved. It would also move away from the capped, formula-driven funding models that have previously driven the distribution of equity-based funding (such as HEPPP and Regional Loading) to a more transparent, responsive model that is directly linked to student enrolments. By weighting institutional funding to recognise the high cost of delivery to equity students, the need for institutions to cross-subsidise equity delivery from other funding sources would be diminished, as is suggested in a recent study.[16]

It should be noted that this would not remove the need for the Higher Education Participation and Partnerships Program, as the HEPPP also funds access and outreach activities. However, it would allow a clearer differentiation between funds provided to universities to fund academic support to equity students (which would be paid via the weighted Commonwealth Contribution amount), and funds provided to encourage access (which would be paid via HEPPP or a similar program).

This weighted funding mechanism should include students enrolled in Commonwealth-funded enabling courses. Enabling courses play a vital role in providing access to higher education opportunities for students from equity backgrounds, but current funding mechanisms often exclude enabling courses. Enabling courses offered by universities are often the only means by which aspiring students from under-represented backgrounds can meet university entry requirements. Additionally, they provide the necessary foundational skills required to embark upon tertiary study. While increasing attainment rates in regional areas is crucial, it is equally important to ensure these students are adequately prepared for academic success.

PATHWAYS TO GRADUATE SUCCESS ARE CRITICAL IN REGIONS FOR DELIVERING SKILLED WORKFORCE OUTCOMES

After a long absence from the workforce, Doreen Canoy faced uncertainty when she sought to re-enter it 22 years after graduating from high school. Similar to many others in regional locations, Doreen was looking to return to full-time work after taking time away to care for her young family.

This is where CQUniversity's Skills for Tertiary Education Preparatory Studies (STEPS) course came in. This bridging program is designed to help those who are returning to study after time away, to meet the entry requirements for their desired course, or to boost their confidence before undertaking university study.

STEPS prepared Doreen to enrol in a Bachelor of Psychology (Honours), which she completed while juggling part-time work. She then went on to complete a Master of Clinical Psychology and worked as an academic designing the Master of Professional Psychology course at CQUniversity before moving on to clinical practice full time.

Thanks to STEPS, Doreen has achieved the financial and emotional freedom she was seeking and is now a highly-regarded mental health professional providing crucial services to Rockhampton and Central Queensland.

Hundreds of students like Doreen graduate from STEPS each year. Forty-five per cent of these students are from low socio-economic backgrounds and 86 per cent live in regional or remote areas.

'As frightening as it was, STEPS truly changed my life. Without this pathway, I would never have been confident enough to commence the journey.'

The Accord should ensure that the Department remains cognisant of the potential impact on equity delivery of any future performance funding mechanisms. The previous Performance-Based Funding Scheme (trialled by the Department in 2020) included measures that encouraged institutions to grow equity participation (the Equity Group Participation measure). However, it also included measures, such as the Student Success/Attrition measure, that are strongly influenced by the demographic and equity status of institutions' student cohorts, and which potentially disadvantaged institutions with large cohorts of students from equity backgrounds. As noted by a number of recent studies, the funding provided to institutions to support equity students is currently considerably less than the cost of delivery to those students. In that context, it would be poor policy practice to disadvantage institutions with large equity cohorts by under-resourcing them for delivery to their equity cohorts, and to further penalise those already under-resourced institutions when those cohorts fail to meet the same performance metrics as other more appropriately funded students. Any future performance-based funding mechanisms must not disadvantage or discourage institutions in servicing the needs of students from equity backgrounds.

CQUniversity believes that reintroducing demand-driven funding for enrolments of students at regionally headquartered universities, will allow institutions to grow equity enrolments and support equity students in achieving their education goals. This could be achieved by similar mechanisms to how the demand driven enrolments for regional/remote Indigenous students were reintroduced as part of the JRG program.

ACCORD FOCUS AREA 3:
FUNDING A SUSTAINABLE HIGHER EDUCATION MODEL

THIS FOCUS AREA ADDRESSES AUSTRALIAN UNIVERSITIES ACCORD DISCUSSION PAPER QUESTIONS 39, 40, 45, 46, 47, 48, 49

RECOMMENDATION

A review of the funding mechanisms developed under the Job Ready Graduates package be undertaken with the view to:

» **ensuring that growth and attainment rate targets are sufficiently funded under any new policy;**

» **ensuring student contribution amounts are not used as a means of signaling student choice through pricing.**

In June 2020, the Australian government introduced the JRG package to reform higher education funding policy. The JRG aimed to redesign funding clusters and student contribution bands, with some fields subject to reductions in student contributions while others were increased. The package also promised other reforms such as growth funding, additional student places in priority fields, and a funding envelope for universities to enrol students at appropriate course levels.

CQUniversity believes that the implementation of the JRG funding and policy mechanisms is flawed and requires revision in several areas. Despite prioritising growing regional/remote attainment, the JRG has not made any provision to increase funding to support this growth rate. Additionally, while the package claimed to provide 39,000 extra places across the sector, the redesign of funding clusters means that universities are not expected to provide additional funding for these places but rather to provide additional student places within the existing funding envelope.

Moreover, the delays in finalising the strategies and funding to grow and support equity enrolments envisioned in the JRG package have further hampered its success. While proposing strategies such as the formation of the Indigenous, Regional and Low SES Attainment Fund, the details of that fund and the strategies it was supposed to support were not finalised, leading to uncertainty regarding the future implementation and resourcing of many of the recommendations of the National, Regional, Rural and Remote Education Strategy.

ACCORD FOCUS AREA 3:
FUNDING A SUSTAINABLE HIGHER EDUCATION MODEL

From a student perspective, the JRG introduced a further principle: that Student Contribution rates should be used to signal areas of high employment demand or what the Commonwealth deems National Skills Priority. CQUniversity is concerned that this additional complexity creates confusion and potential instabilities that will not be sustainable in the long-term, as described in the following points:

» The messaging associated with this change implies that discipline areas such as business are less likely to produce positive employment outcomes for students. Regional Australia continues to experience skills shortages across a broad range of discipline areas, including disciplines such as business. The University is concerned that the higher Student Contribution rates now associated with business-related disciplines discourage potential students from enrolling in those discipline areas, and that this further embeds those skills shortages in regional communities.

» The growing number of factors that the JRG scheme expected to balance in setting Student and Commonwealth contribution rates – cost of delivery, employer demand, personal financial and perceived societal rates of return – create complexities and potential instabilities that will not be sustainable in the long-term.

» Implied in the decision to weight factors such as employer demand in setting Student Contribution rates is that as employer demand or unemployment rates change, so too will Student Contribution rates. How to manage more fluid Student Contribution rates, the messaging relating to those rate changes to students, and the impact that may have on student demand are all factors that have not been adequately considered in implementing the Job Ready Graduates funding mechanisms.

Furthermore, CQUniversity does not support using student contribution settings to 'price signal' and drive student choice into study areas. Instead, the University believes that students' interests and career aspirations have a far greater impact on their choice of degree and overall success, and recognises that today's students are likely to move through multiple careers over their working life.

FIRST NATIONS SUPPORT IS VITAL TO ACHIEVING EQUITABLE OUTCOMES IN RURAL AND REGIONAL AUSTRALIA

After becoming a parent at 18 and struggling to balance family life with work in the mining and construction industries, proud Darumbal and South Sea Islander man Luke Edmund turned to education to improve his prospects.

Thanks to a scholarship that assisted with the costs of learning resources and equipment, and the support of a local campus in Rockhampton, Queensland, Luke has recently completed a Bachelor of Psychological Science.

Thrilled with the opportunity to pursue a career where he could improve the lives of First Nations people in his community, Luke is now considering furthering his studies through research.

His own experiences and background made Luke the perfect candidate to take on mentoring roles for Indigenous high school students across Central Queensland where he has been able to share his story and provide information on the study options available.

RECOMMENDATION
The discrepancy between the indexation rates used in funding envelopes and the actual real-time indexation that is determined via lag-data be addressed, as this impacts the ability of universities to respond to rising delivery costs.

One of the measures introduced in the JRG package was the indexing of the Maximum Basic Grant Amount (MBGA) by the inflation factor set out in the Higher Education Support Act 2003 (HESA). However, the high inflation rates experienced across Australia post-COVID have highlighted a significant issue with this current funding mechanism.

Under the current HESA indexation, there is a two-year lag in compensating universities for rising delivery costs. This means that funding to the sector to account for the high inflation rates of 2022-23 will not be paid until 2024-25, leaving institutions to bear inflation-linked costs, such as staff salaries, in the meantime. This is particularly challenging for regional universities that have much smaller reserves and already face higher delivery costs.

These funding delays directly impact the resources available to support our students and hinders our ability to adapt to external factors or move on emerging opportunities for the regions.

To address the indexation lag issue, it is recommended to make changes to the current indexation factor formulas as per s189-15 of HESA. Two possible solutions are:

1. Using the index number for the June base quarter (i.e. the quarter ending on 30 June in the year prior to the relevant 1 January) to provide more certainty and reduce the indexation lag by half; or

2. Basing the indexation factor on a reasonable estimate of inflation for the relevant year, such as the estimates provided in the Reserve Bank of Australia's quarterly Statement on Monetary Policy.

While the second option may be more complex and require post-estimate adjustments to account for the difference between estimated and actual inflation, both options would improve the current funding lag in HESA.

RECOMMENDATION
The Accord be intentionally geared towards fostering enduring policies, strategies, and financial structures that sustain agreed objectives to increase access, participation, attainment, and productivity.

While there are a number of factors within the JRG that require close consideration, CQUniversity was pleased to see a willingness to identify key policy objectives within the policy, such as growing regional access and attainment and a commitment to a long-term policy and funding framework to address those objectives. The sector's prior reliance on three yearly funding agreements does not provide sufficient long-term policy direction or funding security to allow informed long-term investment decisions in higher education, particularly during the fluid policy and funding environments such as those which existed in 2016 to 2021.

Committing to long-term policy objectives and providing a long-term funding framework – such as improving regional attainment and funding a 10-year plan to increase regional university enrolments - is more likely to result in those objectives being met. The University would recommend that the Government consider further development of such long-term policy and planning frameworks to encourage investment by institutions in achieving policy goals.

ACCORD FOCUS AREA 3:
FUNDING A SUSTAINABLE HIGHER EDUCATION MODEL

RECOMMENDATION

Funding arrangements to better support Research Higher Degree students are reviewed. This structural change must focus on acknowledging the diverse needs of candidates across different institutions, support growth in graduate research training, and ensure candidates are adequately supported through to completion.

Current policy settings do not provide universities with funding support for research candidates until they complete their degree. This model is problematic for regional universities, such as CQUniversity, who have a higher proportion of part-time students undertaking research training whilst juggling family responsibilities, employment and community commitments. As a result, these students take longer to complete their qualifications, which increases the risk of non-completion and creates diseconomies in managing student support.[16] For regional universities like CQUniversity, it is essential that candidates receive support over a longer period, but this is not reflected in the current funding formula.

Additionally, and specifically to CQUniversity, the rapid expansion of our Research Higher Degree (RHD) cohort over recent years has seen a decrease in real terms in Research Training Program (RTP) funding from $9,824 per student, per year in 2019 to just $6,075 per student, per year in 2022. The current funding model based on RHD completions makes it difficult to respond to emerging needs (including the challenges of student mental health and the opportunities for greater collaboration with industry), as the funding system is too slow to respond to growth in student demand. Furthermore, the model currently places a 10 per cent annual cap on RTP spend for international candidates, which unnecessarily restricts the strategic use of these monies by smaller institutions and makes it difficult to plan for long-term, sustainable partnerships with industry partners because of the year-to-year funding uncertainty.

Large institutions are advantaged by having more flexibility to cater to their often single-location RHD cohort, while regional universities face higher operating costs needed to bring their diverse cohorts together and create thriving research communities. Therefore, an RTP funding model that introduces a 'flagfall' amount for all universities that are recognised as graduate research providers, and then provides additional funding based on a combination of Research Higher Degree completions and student load, would address funding disparity and the relative disadvantage that regional institutions experience compared to their metropolitan counterparts.

Funding for research training could also be designed more flexibly to reward institutions that attract graduate research students with rich industry experience, consistent with the Government's goals to bring industry and research closer together. Often, this experience is in small to medium enterprises or in state government, as these represent key sectors for regional job markets. For candidates such as these, undertaking an industry placement is unlikely to deliver significantly better employability, since they already possess well-developed industry skills.

CQUniversity RHD candidates have an average of 20 years of experience in the workforce prior to commencing their graduate research degree.

Furthermore, many of these candidates continue to balance paid work with RHD study, and thus contribute to regional business and industry. The current model for incentive payments linked with RHD industry placements is ill-equipped for such students, as it artificially constrains candidates to 'lock-in' their placement opportunity within the first 18 months of their degree, and then to conduct the placement itself later in candidature. This is an unnecessary barrier and creates uncertainty for candidates with paid work commitments and/or who need to be mobile within and between different areas in regional Australia.

Providing flexibility for institutions to be able to demonstrate that a candidate already has industry skills, and then enable those candidates to undertake a placement at a more suitable time in their candidature (such as in late-stage thesis drafting or examination) would help reduce uncertainty and drive more candidates to participate in placements.

Such a model would also have additional benefits, including that industry partners would be able to access placements with candidates who are already industry experienced.

It would also drive universities to collect more granular data about the profile of industry experience of their cohort, thus leading to a better understanding of the industry-research nexus in our research workforce.

ACCORD FOCUS AREA 3:
FUNDING A SUSTAINABLE HIGHER EDUCATION MODEL

RECOMMENDATION

Regional universities are supported to meet their current and future infrastructure needs by:

» **reinstating the Education Investment Fund, either solely for smaller and/or regional institutions, or with a dedicated funding round exclusively for regional university infrastructure;**

» **quarantining an agreed percentage of the ARC's Linkage Infrastructure, Equipment and Facilities funding scheme for regional institutions to address the significant disparity in past funding outcomes between metropolitan and regional universities;**

» **ensuring that future university infrastructure funding mechanisms include provisions for regional universities' digital infrastructure needs (including cybersecurity) and ongoing infrastructure maintenance costs; and**

» **including regional universities in the eligibility criteria for regional infrastructure grant pools.**

For CQUniversity, like many regional universities, providing accessible education comes at a significant infrastructure cost. Students in regional and remote areas often face geographic and socioeconomic barriers to accessing higher education[17], and regional universities have responded in kind with accessible multi-campus footprints that carry much higher ongoing costs on a per-student basis. Although higher cost, this multi-campus approach has the added benefit of allowing regional universities to cater to the specific needs of different communities and industries within their catchment areas, better enabling these universities to support local economies and contribute to regional development.[18]
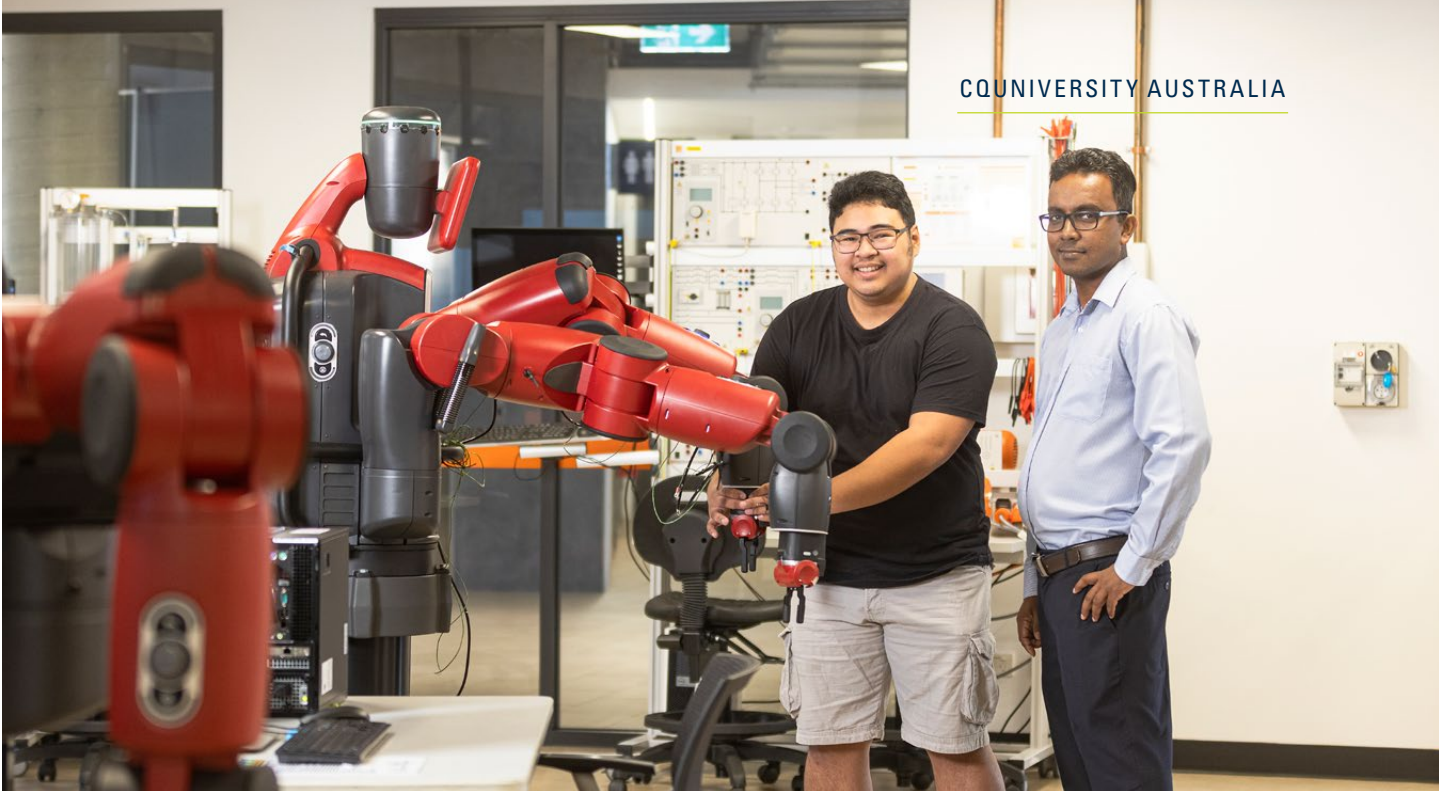
However, the cost of delivering new infrastructure, maintaining existing infrastructure, and retrofitting existing facilities to cater to the teaching and research needs of the future, is prohibitive for many regional universities. In past years, the presence of the Education Infrastructure Fund (EIF) has eased this burden, allowing regional universities to develop new infrastructure without substantial bottom-line impact.

Even before the closure of the EIF in 2019, universities had lacked dedicated infrastructure funding for several years, as no funding was released from EIF for the final years of its operation. The lack of a suitable funding replacement since, has seen campus infrastructure stagnate and decline across many regional universities, with students bearing the brunt of the consequences.

Current infrastructure funding models and mechanisms heavily favour those universities that have the ability to operate at scale, which only serves to exacerbate the disparities between student experiences at metropolitan and regional institutions. This funding discrepancy, if left unaddressed, is likely to create a divide over the next 10 years where students from regional areas – already subject to historic disadvantage and under-representation – have inferior access to learning experiences, research outputs, and other opportunities compared to their metropolitan peers. Ultimately, this will result in reduced workforce readiness and social mobility for graduates from regional Australia.

Financial constraints often limit the availability of capital resources, making it challenging for regional universities to invest in contemporary online and physical teaching and learning spaces that offer high-quality learning environments equivalent to those available at metropolitan universities. Moreover, limited financial resources result in a significant maintenance backlog within asset planning. CQUniversity currently holds a maintenance backlog liability of approximately $30 million and the rising cost of construction in regional Australia exacerbates this challenge.

The capacity of regional universities to grow and maintain regional research infrastructure is also constrained by funding limitations. The Australian Research Council's Linkage Infrastructure, Equipment and Facilities funding scheme is acknowledged as the primary funding source for research infrastructure in Australia (and one of few such sources available). The Scheme supports collaborative proposals with multiple users, which advantages larger metropolitan universities. Since 2010, just 1.74 per cent (14 out of 802) grants were awarded to proposals led by RUN universities.[19]

This persistent imbalance in research opportunities limits regional Australia's access to cutting-edge research outputs, resulting in reduced economic opportunities and innovation potential outside of metropolitan Australia.

In this context, should we simply send regional students to the capital cities to learn, train and research? Of course not.

Evidence shows that quality education and research outputs in regional areas results in more people staying in the regions for training and work.

Of the students who graduate from a regional university, 70 per cent go on to remain living and working in regional, rural and remote Australia after graduation, enriching regional communities and economies while suppressing the widening of the city/country skills disparity.

Unfortunately, we also know the reverse is true: 74 per cent of regional students who relocate to study at a metropolitan campus don't return to the regions to live and work after graduation. It is therefore incumbent on all regional universities to present an accessible, supportive, competitive, comprehensive, and high-quality tertiary education option (in both teaching and research) for the communities they serve.

Nevertheless, the inadequate funding for infrastructure, and the scale limitations of regional universities operating multiple campuses across thin markets, hinders our ability to maintain and enhance facilities, thereby restricting our potential to attract and retain students, and to fully contribute to regional economic growth.

While base funding for university places includes a notional amount for maintenance of facilities, and Research Block Grants account for minimal support for equipment, dedicated infrastructure funding has not been provided since the demise of the Research Infrastructure Block Grant. For example, although almost one third of Research Support Program (RSP) funds at CQUniversity have been directed to support capital expenditure, the broad responsibility of RSP to support the indirect costs of research has seen the dedicated support of research infrastructure more than halved.

Recent regional infrastructure grant pools such as the previous Building Better Regions Fund, have deliberately omitted universities from eligibility criteria.

Investing in high-quality tertiary facilities across the country is crucial for the future success of Australia's higher education system. Favouring the establishment of tertiary facilities and infrastructure to just our largest cities undermines the strength of our higher education system, leaving regional capacity vulnerable and perpetuating inequality amongst students and communities.

To ensure that regional higher education providers can meet the skilling and research needs of all Australians into the future, it is paramount that the Australian Universities Accord supports affirmative investment in regional infrastructure.

ACCORD FOCUS AREA 4:
FOSTERING EQUITABLE ACCESS TO RESEARCH AND INNOVATION

THIS FOCUS AREA ADDRESSES AUSTRALIAN UNIVERSITIES ACCORD DISCUSSION PAPER QUESTIONS 24, 25, 26, 27, 41

RECOMMENDATION

The comprehensive status of regional universities is to be protected, as an acknowledgement of the significant contribution regional universities make to innovation and discovery, particularly in partnership with regional industry.

The review of the Higher Education Standards Framework in 2019 once again put the research intensity of regional universities under the spotlight, with some players arguing that the national interest would be better served by concentrating research activity in fewer (generally capital city) universities.

However, any change to the comprehensive status of existing Level 1 regional universities would be disastrous for regional economies, regional industry, and the richness and diversity of regional life.

Regional universities, like CQUniversity, are comprehensive institutions that encompass research, teaching and, where applicable, vocational training. Where some metropolitan universities in dense and competitive markets have the latitude to specialise their offerings for students – other specialties may only be a bus trip away – regional universities must provide a wide range of courses to cater to the breadth and depth of skills needs in regional communities. Additionally, regional universities must maintain the long-standing tradition of conducting research that is relevant to regional communities, with a focus on industry engagement and applied problem-solving over blue sky research.

Research conducted by regional universities, for regional communities, can help to identify new industries and opportunities for growth, inform policy decisions, and develop new technologies that can improve the lives of regional Australians. For example, research conducted by regional universities has been crucial in improving agricultural practices, developing health services, enhancing cultural understanding, and promoting regional development. However, geographic disparity has denied many small to medium sized regional institutions the opportunity to cultivate flourishing research capabilities.

Regional universities receive a lesser share of Research Training Program block grant funding, which has driven the need to look for industry partnerships to fund much-needed research stipend scholarships that will help attract and retain bright minds into Australia's regions, and work on problems of importance to regional Australia.

To take an example that could be mirrored in many other regional institutions, CQUniversity's Elevate scholarship program commenced as a co-funded opportunity for the University and local partners to work together on these goals. Since 2020, this has resulted in almost 90 scholarships where we invest together in projects that matter to industry and community, many of them with smaller, regionally located organisations. Partnership examples include Agriventis, AusPac, Kenon Mushrooms, Burnett Mary Regional Group, Bundaberg Rum Distillery, Cairns Taipans, Centacare CQ, Fitzroy Basin Association, Gladstone Ports Corporation, Surf Lifesaving Queensland, Hans Australia, Manbullo, St Brendan's College, Whitsunday Water, Northern Australian Primary Health Limited, and many others, including those with the CRC for Developing Northern Australia.

'My research evaluated how we monitor patients in rural and remote regions, more particularly in Queensland.'

CQUniversity has also established a specific focus on research partnerships with local government, to tackle the problems and opportunities within our regional communities. A pilot project was commenced in 2022 under the National Priority Industry Linkages Fund and this has already resulted in partnerships with multiple local government authorities, with more in negotiation.

While CQUniversity continues to meet the TEQSA requirements to be formally recognised with full university status, CQUniversity nonetheless firmly rejects any policy setting that would turn existing regional universities into specialised 'teaching only' institutions. This is based on the over-representation of regional institutions that could potentially lose formal university status via such a transition. At a time of emerging regional economic potential and simultaneous regional shortages of critical skills, it would be detrimental for regional communities to potentially see regional universities having their formal status tested, owing largely to historic policy settings that have persistently and disproportionately favoured tertiary provider models operating at scale in large metropolitan markets.
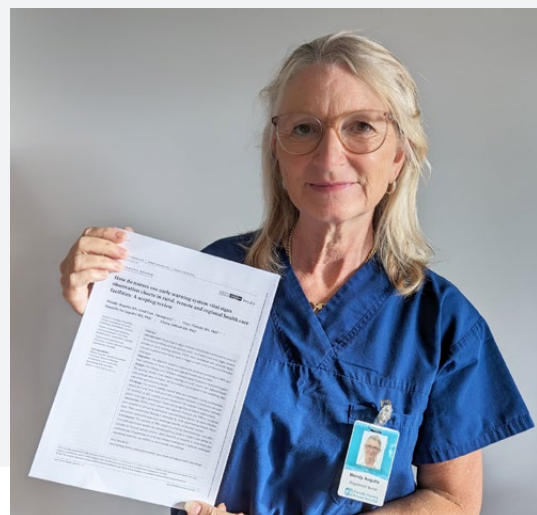
It is therefore imperative for the benefits that locally informed research can bring to regional prosperity and the nation that the Commonwealth continues to provide regional universities with the necessary policy support to continue their mission of regional growth and empowerment. This support should include increased funding for infrastructure, research, and education, as well as policies that promote regional development and attract high-quality academic staff to regional universities.

REAL WORLD OUTCOMES HELP TO ADDRESS REGIONAL AND RURAL HEALTH GAPS

Research on patient monitoring data has identified key challenges faced by rural and remote regions that could be putting patient health at risk.

CQUniversity masters student Wendy Augutis, a registered nurse based in Bundaberg, identified that while large data sets were available on how nurses monitor patients in larger city hospitals, there was very few data in rural and remote regions. Her paper, recently published in the Australian Journal of Rural Health, looked at how nurses use early warning system vital signs observation charts in rural, remote and regional health care facilities.

Wendy identified key issues including inconsistent or inaccurate documentation leading to missed opportunities to identify at-risk patients, the need for better communication within the teams to facilitate compliance, and the many challenges rural and remote regions face that need to be addressed, including staff shortages. "Patient deterioration in hospitals frequently occurs prior to an adverse event or death. This is potentially preventable as abnormal vital signs are frequently identifiable 24-36 hours prior to such an event," Wendy said.

ACCORD FOCUS AREA 4:
FOSTERING EQUITABLE ACCESS
TO RESEARCH AND INNOVATION

RECOMMENDATION
The diversity of research activity across the sector is recognised which, for regional institutions, is often aimed at the applied research needs of their communities.

It is critical that policy settings promote and support collaborative research efforts among industry, government, and universities across all levels. Like all regional universities, CQUniversity focusses on delivering applied research that addresses the unique social, industrial, and cultural needs of the communities within which it serves. However, geographic imbalances in the distribution of national research funding, activity, and infrastructure, limit our ability to respond to need.

A disproportionately large share of the research capability of our sector is concentrated within a few larger metropolitan institutions. CQUniversity strongly believes that the importance of applied research conducted in regional Australia, for the benefit of regional Australia, is overlooked. This means a research-trained workforce and regional research capabilities are negatively affected by research funding settings which favour select universities that are able to operate at scale, with large endowments to fund their research activity.

This growing concentration of effort and dilution of balance represents a significant vulnerability in the diversity and accessibility of our national research agenda. Just as the Accord focuses on redistributing the benefits of Australia's degree attainment rates more equitably to regional Australians, CQUniversity believes there should be equal attention on a more equitable redistribution of Australia's research funding. Several approaches could be adopted to achieve this goal, such as:

» incorporating a regional research loading within the Block Grant formulae;

» introduce metrics that value applied research outcomes rather than simply citations; and/or

» providing targeted contributions to regional universities for acquiring and maintaining infrastructure that supports regional research requirements.

The Government's current focus on commercialising research is consistent with the work of regional universities that conduct applied research and play a vital role in supporting research translation. However, additional funding is required to support this mission, particularly for institutions that lack the resources to commercialise innovation efficiently. A national independent commercialisation office would bridge the gap between academia and industry, ensuring that the translation is done effectively and independently.

ACCORD FOCUS AREA 5:
AN INTEGRATED POST-SCHOOLING EDUCATION CONTINUUM

THIS FOCUS AREA ADDRESSES AUSTRALIAN UNIVERSITIES ACCORD DISCUSSION PAPER QUESTIONS 13, 15, 16, 17, 18, 19, 20, 21, 36, 37

RECOMMENDATION
A seamless and integrated post-schooling education continuum is established and considers:
» **extending the self-accreditation status of Australia's six dual sector universities to include vocational education courses; and**
» **expanding the national regulatory and quality assurance agency to cover the entire tertiary sector (including vocational education and training and higher education).**

Access to high quality, equitable educational opportunities – be it early childhood, primary/secondary schooling, or post-school vocational or tertiary study – is a foundational prerequisite to achieving sustainable employment, productivity and wage prosperity at a national, community and individual level. Five-year projections by the National Skills Commission[20] show that more than nine in ten future jobs will require post-school qualifications; occupations in high demand are even more likely to be specialised and require higher level skills and formal qualifications. To meet Australia's skilling needs of the future, CQUniversity supports an increased focus on developing flexible, transparent pathways between all elements of Australia's post-schooling system. This will require all sectors and accrediting authorities to better recognise prior learning, and to co-create pathways for those looking to upskill, reskill or transition to other elements of the sector.

As a dual sector University in a regional area, CQUniversity is one of only six 'full-service providers' in Australia operating across both the higher education and Vocational Education and Training (VET) systems.

REGIONAL VET STUDY DELIVERS REAL SKILLS FOR REAL JOBS

Sharon Line's TAFE studies at CQUniversity has given her a personal and professional boost – helping her to secure employment and providing specialist skills to support her disabled father.

Just one month after starting her Certificate III in Individual Support training, Sharon secured a job as a Care Companion for Right At Home In Home care and assistance in Mackay – the start of what she says is an extremely rewarding career.

"I have met all kinds of clients with different needs and disabilities and have also supported people with family members in palliative care." she said.

Sharon was also pleased to be able to put her new knowledge to use in the care of her father, who has been diagnosed with dementia and has had one of his legs amputated.

Sharon is exploring opportunities to further her education upon completing her certificate, aiming to equip herself with new skills that will complement her existing experience to enhance her job prospects.

ACCORD FOCUS AREA 5:
AN INTEGRATED POST-SCHOOLING EDUCATION CONTINUUM

As a regional university we are held to account by our communities to support local social, cultural and economic interests, including our obligation to meet the growing and evolving needs of industry and the ongoing development and renewal of key community workforces. However, the current fragmented policy, funding and regulatory settings only serve to widen the disparity between the Vocational and Higher Education sectors and frustrate our abilities to provide pathways and integrated flexible learning opportunities that combine the best of the two systems.

Additionally, lifelong learning pathways are not always linear. Significant numbers of higher education graduates take up a practical skills-based qualification during or after attaining their degree. To enhance this model, innovation is needed so that students can select and combine learning options from both sectors, simultaneously. Currently, funding and accreditation restrictions, policy and regulation make this very difficult to achieve.

The discussion on connecting the VET and higher education sectors needs to go beyond pathways and look to the creation of new qualifications. To improve responsiveness to Australian and industry skills and knowledge needs, vocational providers need the ability to be more flexible and agile and a first step to achieving this would be to provide self-accreditation status to Australia's current dual sector universities for vocational courses.

Dual sector universities are already self-accrediting in the higher education space and, as a result, work closely with industry and stakeholders to create contemporary courses and produce job ready graduates at scale. Applying this capacity to the vocational setting would enable a more flexible and speedy response to the changing needs of the Australian workforce – much more agility than is currently able to be produced by the existing VET Training Package and course accreditation approaches, which can take years to bring an urgently needed new course or set of skills training to fruition.

A strong and autonomous vocational sector will help meet Australia's short-term skills shortages, boost productivity of the workforce and better prepare Australians for the jobs of the future. Dual sector institutions such as CQUniversity, with their combined experience of working across the two sectors, are ideally placed to develop a more flexible approach to the development and governance of new vocational training and education courses, incorporating the best of the two halves of Australia's tertiary system. At the very least, the ability to develop and internally accredit VET courses could be piloted through current regional dual sector universities.

This goal would be further supported if the currently separate ASQA and TEQSA compliance agencies were combined. Currently, the two agencies have separate standards, auditing approaches and compliance regimes. Specifically, having to deal with two separate regulators with separate compliance requirements, rules, processes and auditing approaches means the goal of a more integrated system is unnecessarily complicated and impeded.

A first step towards such a goal would be a joint review of the currently separate Higher Education Standards Framework 2015 and the Standards for Registered Training Organisations 2015 for areas of potential standardisation.

This idea is not a new one. Recommendation 43 of the 2008 Bradley Review of Australian Higher Education proposed that The Australian Government negotiate with the states and territories to:

Expand the national regulatory and quality assurance agency to cover the entire tertiary sector (including vocational education and training and higher education) and that the Australian Government assume full responsibility for the regulation of tertiary education and training in Australia by 2010.[21]

The Independent Tertiary Education Council of Australia (ITECA) has proposed the resumption of work to this end and has initiated an internal working group to review this potential.[22]

VOCATIONAL EDUCATION FUNDING REFORM

The Bradley Review of Australian Higher Education noted that "an OECD review of VET in Australia refers to the 'bewilderingly variable and complex' fees charged to students and the different options for help in meeting them". Sadly, this statement remains today's reality.

The ensuing 15 years have seen, if anything, an increase in the short-termism, complexity and fragmentation of Vocational Education and Training funding.[23] This only serves to widen the disparity between vocational and higher education and undermines our efforts to provide high quality, equitable educational opportunities to our regional students.

To support an equitable Australian post-schooling ecosystem, that works to meet the skilling needs of Australia's diverse future workforces, and to ensure that all Australians – regardless of their location or background – can pursue their desired level of study, CQUniversity proposes that VET funding be transformed through the initiatives described below.

ACCORD FOCUS AREA 5:
AN INTEGRATED POST-SCHOOLING EDUCATION CONTINUUM

RECOMMENDATION
Student subsidies and funding agreements for VET courses be standardised across State and Commonwealth, including the introduction of funding VET student subsidies on enrolment rather than completion, in a similar manner to that of higher education.

Currently, every state subsidises vocational students differently – different rates of subsidy, different approaches to payment, and differing eligibility rules around student access. Compounding this is further complexity within individual state funding arrangements. In Queensland alone, there are up to nine different factors that the State uses to calculate the appropriate subsidy rates for a specific student enrolling within a specific qualification.

This level of complexity makes it impossible for providers to provide simple, readily understood information to potential students on potential cost outlays, and at an institutional level makes it challenging to strategically plan and ensure course viability in the VET space, which is a significant impediment to having a more open and agile VET market across Australia.

The same course receives different subsidies across jurisdictions[AB]
Certificate III in Individual Support: subsidy and concessions for non apprentices ($), September 2020.

Legend:
- Concession (Aboriginal and Torres Strait Islander People)
- Base Subsidy
- Loading (Aboriginal and Torres Strait Islander People)
- Loading (Regional/Remote)

[A]These comparisons are for illustration. Due to the varied nature of information on subsidies some jurisdictions' data have been supplemented with TAFE data and amounts may not be directly comparable.

[B] This comparison is for an Aboriginal or Torres Strait Islander student living in a regional or remote location.

Source: Commission estimates based on information available from State and Territory subsidised training lists.

Standardising funding across all jurisdictions that fund public VET provision at an equivalent level to that provided to higher education providers, would ensure equity across all facets of the post-schooling system.

While it is acknowledged that each state funds VET enrolments differently, currently, they all share a common underpinning principle that preferences providers being paid for training and education delivery upon successful student completion rather than commencement, which is at odds with current Higher Education funding mechanisms.
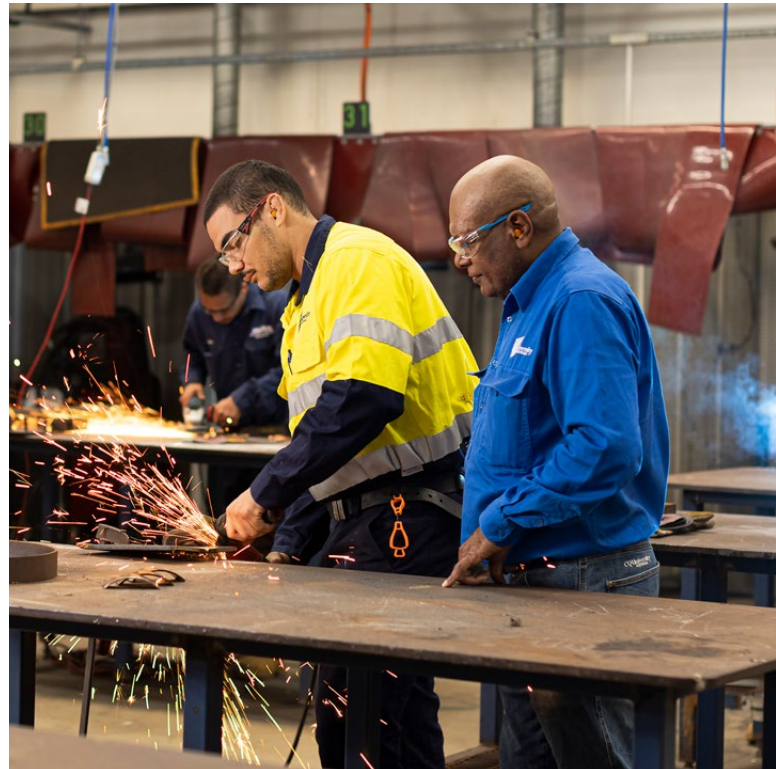
CQUniversity is of the firm view that this disparity places dual sector operators at a distinct disadvantage, as the delay in receipt of funding forces dual sectors to 'cash flow' VET enrolments. To address this issue, a more equitable solution would be to change subsidy reimbursement to an up-front or staged model. Such models exist across some states and are also similar to how higher education is funded.

RECOMMENDATION

Vocational Education and Training be resourced on an equal footing to higher education and the number of private 'for-profit' RTOs accessing the public purse should be reduced.

Over the past decade, the VET sector has been significantly underfunded, with little allocation of funds towards TAFE equipment, infrastructure, resources, teachers, and support personnel. Although there has been a recent focus on vocational skills training by Federal and State governments, the funding is primarily targeted at individual students and employers, leaving the public and dual sector providers within the TAFE sector with limited resources to cater to the growing demand for training. Additionally, as outlined above, VET student funding is only issued after the student completes their training, which creates a discord between the demand-side growth and the supply-side constraints inbuilt into the current approach.

The situation is exacerbated in Queensland, where VET funding has reduced over the past 10 years and has not kept up with inflation. Combining this with a significant shortage of skilled TAFE teachers, CQUniversity is facing a bottleneck in capacity to service the increased demand for training and a lack of funds to ramp up a training response quickly.

The 2023 'Fee Free TAFE' funding, which provided additional funding for student support and ancillary services in Queensland, was a welcome divergence from this trend. However, if the vocational operations of CQUniversity were funded via upfront student payments, and to an appropriate level to recognise the cost of delivery, it would directly address the major challenge in delivery capacity. An improved funding model would also improve the capacity to recruit and retain skilled TAFE teachers, resulting in more training and up-to-date training equipment and facilities being provided. Currently, the salaries offered to prospective TAFE teachers are unable to compete with the salaries they could attract in industry, particularly during times of skill shortages when the same pool of talent is sought by both industry and education sectors.

To achieve this goal, one solution would be to reduce the share of funding provided to for-profit Registered Training Organisations and redirect these funds to supporting a more sustainable and base-funded public TAFE sector. Private RTOs often have a business model that encourages training offerings in easy-to-deliver areas with good financial returns. They do not attempt to deliver the expensive courses that public TAFEs are committed to provide. In reducing the number of RTOs and their access to public funds, the public TAFE's will be better able to access more profitable markets, to help subsidise the marginal offerings.

ACCORD FOCUS AREA 5:
AN INTEGRATED POST-SCHOOLING EDUCATION CONTINUUM

RECOMMENDATION
VET students enrolled in Certificates III and IV are provided access to Commonwealth supported student loans.

Vocational students can only access Commonwealth supported student loans to assist with their study costs if they are studying a Diploma-level (AQF 5) qualification This creates inherent inequality since many occupations, especially those in areas of regional skill need, have a Certificate III or IV level qualification as the recognised entry level qualification for a career in that particular industry, with Childcare and Aged Care (individual support) being only two such examples. This in-built inequity is a barrier to entry to the workforce based solely on whether the student's chosen education and career path is higher education or vocationally focused.

There is no problem getting a government-supported loan to help you study towards managing a childcare centre, if you study a degree, but if you intend to be a childcare worker, you cannot currently access a student loan to help you into this industry.

Although some VET courses have received additional Commonwealth or State funding, reducing, or eliminating student fees, this approach may not be sustainable in the long term. As such, CQUniversity recommends that the extension of VET Student Loans to lower AQF levels be actively investigated to consider (at least) targeted skills-shortage-related vocational courses, at Certificate III and IV levels.

It is imperative that the recommendations throughout this report are considered collectively, because the selection of some initiatives in isolation could result in private Registered Training Organisations or metropolitan universities exploiting a circumstance that undermines the viability of regional universities and the long-term benefits to the regions.

ACCORD FOCUS AREA 6:
AN AGILE AND EFFICIENT HIGHER EDUCATION SECTOR

THIS FOCUS AREA ADDRESSES AUSTRALIAN UNIVERSITIES ACCORD DISCUSSION PAPER QUESTIONS 19, 37

RECOMMENDATION
A reporting framework that reduces overlap and creates efficiencies in the cost of reporting and compliance is established.

Navigating appropriate governance and compliance in universities is an intricate and multifaceted task, but one that cannot be compromised. The complexity of handling state and federal reporting requirements and the expectations of other stakeholder groups make this task even more challenging. With increasing external environmental risks, the responsibility of managing and reporting these risks has been shifted onto universities, resulting in a high cost of compliance that is not currently accounted for in the funding model. Moreover, regional universities face even more significant challenges in meeting these requirements given their limited resources and competing priorities.

As a result, CQUniversity has had to invest significant resources to manage the increasing burden of compliance, diverting these resources from our core business. The cost of our core business is rising exponentially with the Government's rising expectations of what universities should provide to students, with no compensation attached. These challenges put a strain on the long-term financial sustainability of the University, impact service delivery in the shorter term and increase the challenge of properly managing these risks. It is worth noting that almost all requests and changes for additional reporting also require significant changes to IT systems, an often hugely expensive exercise.

Over the past few years, several new compliance requirements have been introduced, all of which come with associated costs, including Foreign Interference, Tertiary Collection of Student Information (TCSI), Unique Student Identifier (USI), Transparency in Higher Education Expenditure Data Collection, Modern Slavery, and Respect, Now, Always. While we recognise the importance of these initiatives, we cannot ignore the significant financial cost of compliance that they incur.

Through the design of the Accord, it is imperative to consider the numerous regulatory obligations universities hold when determining the reporting structures to support policy implementation. CQUniversity recommends that there is no net increase in the metrics universities are currently required to monitor and report. Additionally, the Accord process should consider implementing a structure to assess universities' current reporting requirements, with a view to simplify reporting frameworks in the sector.

REFERENCES

1   Regional Universities Network, Economic Impact of the Regional Universities Network, September 2020, accessed at http://www.run.cqu.org.au/wp-content/uploads/2021/05/RUN_Summary_Report_final_.pdf on 7 March 2023.

2   Regional Australia Institute, University enrolments in Regional Australia: Trends, Challenges and Opportunities 2017, accessed at https://www.regionalaustralia.org.au/home/research-policy/research-library/?a=258332 on 7 March 2023.

3   National Centre for Vocational Education Research, Regional Universities and Vocational Education and Training (VET) 2016,
accessed at https://www.ncver.edu.au/publications/publications/all-publications/regional-universities-and-vocational-education-and-training-vet on 7 March 2023.

4   Australian Council for Educational Research, Work-Integrated Learning in Regional Australia: What We Know and What We Need to Know, 2018, accessed at https://www.acer.org/files/acerresearch/2018_Work-Integrated_Learning_in_Regional_Australia.pdf on 7 March 2023.

5   National Centre for Vocational Education Research, Engagement of Regional Universities in Continuing Education and Professional Development, 2014, accessed at https://www.ncver.edu.au/publications/publications/all-publications/engagement-of-regional-universities-in-continuing-education-and-professional-development on 7 March 2023.

6   Deloitte Access Economics, The importance of universities to Australia's prosperity 2020, accessed at: https://www.universitiesaustralia.edu.au/wp-content/uploads/2022/04/Report-The-importance-of-universities-to-Australias-prosperity.pdf on 20 March 2023.

7   The Hon John Dawkins MP, Higher Education: a policy statement, AGPS, Canberra,1988, accessed at https://nla.gov.au/nla.obj-2518053881/view?partId=nla.obj-2520354289 on 20 March 2023.

8   The Hon. Wayne Swan MP, Australia to 2050:Future Challenges, accessed at https://treasury.gov.au/sites/default/files/2019-03/IGR_2010_Overview.pdf, on 20 March 2023.

9   Australian Government Department of Education, Australian Universities Accord Panel Discussion Paper 2023, accessed at https://www.education.gov.au/australian-universities-accord/resources/australian-universities-accord-panel-discussion-paper on 7 March 2023.

10 Regional Australia Institute, Rebalance the Nation, September 2022, accessed at https://www.regionalaustralia.org.au/Web/Research-Policy/Regionalisation-Framework.aspx on 20 March 2023.

11 Deloitte Access Economics, The importance of universities to Australia's prosperity, 2020, accessed at: https://www.universitiesaustralia.edu.au/wp-content/uploads/2022/04/Report-The-importance-of-universities-to-Australias-prosperity.pdf on 20 March 2023.

12 Grattan Institute, More regional Australians are moving to the city to study. Few return when they've finished, 2019, accessed at: https://grattan.edu.au/news/more-regional-australians-are-moving-to-the-city-to-study-few-return-when-theyve-finished/ on 9 March 2023.

13   Hillman, K. and Rothman, S. "Movement of non-metropolitan youth towards the cities", Longitudinal Study of Australian Youth Research Reports. Australian Council for Educational Research, Melbourne, 2007.

14   Bookallil, C., McKenzie, L., Watson, R. and Kinnear, S., 2022, ''Context, capital and care': Understanding and alleviating pressures to support successful research
higher degree completions in regional Australia'. Joint project report: 118 pages.

15   Deloitte Access Economics, The importance of universities to Australia's prosperity, 2020, accessed at:
https://www.universitiesaustralia.edu.au/wp-content/uploads/2022/04/
Report-The-importance-of-universities-to-Australias-prosperity.pdf on 20 March 2023.

16   Devlin, Zhang, Edwards, Withers, McMillan, Vernon, Trinidad, The costs of and economies of scale in supporting students from low socioeconomic status backgrounds in Australian higher education 2022, accessed at https://www.researchgate.net/publication/240532152_Dawkins'_Higher_Education_Reforms_and_How_Metaphors_Work_in_Policy_Making/link/5bfc6ef0299bf10737f99e62/download on 20 March 2023.

17   Australian Government, Higher Education Participation and Partnerships Program National Report 2020, accessed at https://www.dese.gov.au/higher-education-participation-and-partnerships-programme-national-report-2020 on 8 March 2023.

18   Regional Universities Network, (n.d.), accessed at https://www.run.edu.au/about-run on 9 March 2023.

19   Australian Research Council, (n.d.), Grants dataset, accessed at https://www.arc.gov.au/funding-research/funding-outcome/grants-dataset on 15 March 2023.

20   The National Skills Commission (NSC) Employment Projections. Projected employment growth by skill level, November 2021 – November 2026 Chart, accessed at https://www.nationalskillscommission.gov.au/topics/employment-projections#:~:text=More%20than%20nine%2Din%2Dten,five%20years%20to%20November%20 2026 on 13 March 2023.

21   Australian Government, Review of Australian higher education: Final report, 2008, accessed at https://www.dese.gov.au/sites/default/files/documents/09_2012/Higher_Ed_Report.pdf on the 13 March 2023.

22   Independent Tertiary Education Council Australia, accessed at https://www.regulatoryreform.gov.au/sites/default/files/consultations/submissions/2022/independent-tertiary-education-council-australia.pdf on the 19 March 2023.

23   Australian Government, Review of Australian higher education: Final report, 2008, accessed at https://www.dese.gov.au/sites/default/files/documents/09_2012/Higher_Ed_Report.pdf on the 13 March 2023.

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