

26 July 2024

Mr Tony Cook PSM
Secretary & Chair of the Accord Implementation Advisory Committee
Department of Education
59 Marcus Clarke Street
CANBERRA ACT 2601

Dear Mr Cook

Submission to the Australian Universities Accord Post-Budget Implementation Consultation Papers

The Australian Academy of Technological Sciences and Engineering (ATSE) is a Learned Academy of independent, non-political experts helping Australians understand and use technology to solve complex problems. Bringing together 900 of Australia's leading thinkers in applied science, technology and engineering, ATSE provides impartial, practical and evidence-based advice on how to achieve sustainable solutions and advance prosperity.

Thank you for the opportunity to comment on the implementation of elements of the Australian Universities Accord (the Accord). Through the Accord consultation process, ATSE provided three submissions to the working group which cover many of the elements the Department is currently consulting on. Attached to this letter are two of ATSE's submissions to the Accord that are relevant to the three current areas of consultation.

Australian Tertiary Education Commission (ATEC)

In ATSE's submission to the Accord's Interim Report, ATSE outlined the role the ATEC should play in Australia's higher education landscape. An ATEC can support providers to implement best practices, both for learning and teaching and for other provider responsibilities, such as addressing gender-based violence in universities.

There is a risk of the ATEC becoming an additional regulator of the sector and increasing administrative burdens. ATSE notes that the proposed objectives and methods do not mention students once. The ATEC will be most effective by placing students at the core of its mission, and by regarding students as a key stakeholder group with which the ATEC collaborates. This will support the ATEC to undertake effective long-term policy reform for the sector.

It is imperative that ministerial ability to direct the ATEC is balanced with this education-first approach. ATSE would support ministerial directions being made public and only being general in nature, with the ATEC given the responsibility of determining how ministerial direction is enacted.

Managed Growth Funding System

The proposed managed growth funding system is driven by student demand, with funding allocated to higher education providers based on student applications. To make this model work, students will need high quality information about their course options and how they align with future careers. Utilising the National Skills

Taxonomy (under development) to align understandings of in-demand skills with courses on offer will support future students in course selection.

The proposed model of funding has universities being rewarded for securing applications even if students never study there, there is a risk that universities will be incentivised to encourage applications from students with no real prospect of admission, to simply boost their application numbers. Conversely, small and regional universities are at risk of constantly declining funding, with reducing student numbers leading to funding cuts that trigger cuts to staff, facilities and services that then lead to more students turning to other providers. Small and regional universities allow regional students more educational opportunities while maintaining connections with their communities – their decline would severely reduce equity for students. This would disproportionately impact Aboriginal and Torres Strait Islander people’s engagement in higher education – despite the Accord aspiring to increase educational attainment of this cohort. Consideration needs to be given to the protecting students and universities from the risks of a demand driven funding system.

Needs Based Funding

ATSE’s submission to the Accord’s Discussion Paper outlines ATSE’s position on a needs-based funding model for university students. ATSE supports the proposed model of having needs-based funding for students from low SES backgrounds, Aboriginal and Torres Strait Islander students, students with disability and students studying at regional campuses. However, the proposal to use the Australian Tertiary Admissions Ranking (ATAR) to reflect academic preparedness in funding calculations will most likely result in funding calculations becoming dependent on factors that are unrelated to academic preparedness. ATAR is highly influenced by disadvantage and does not necessarily predict university outcomes. For example, students from public high schools have consistently been shown to perform better on average at university than private school students with the same ATAR. Demographic factors, like the ones mentioned above, may therefore be a better estimate of ongoing funding needs.

If you would like any further information or would like to engage with our network of over 900 engineering, technology and applied science experts please contact academypolicyteam@atse.org.au.

Yours sincerely

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