



THE UNIVERSITY OF
SYDNEY

Reimagining Australian tertiary education: *12 nation-building ideas*

Submission to the Australian Universities Accord
April 2023



Foreword

Since 1943, when the Commonwealth first began to craft vital policy reforms for higher education, the sector has become a crucial pillar for building the Australian nation.

The Chifley and Curtin governments' creation of the Universities Commission and student scholarships to expand access to higher education, the Menzies' Government Murray Report, Whitlam's free education, the Dawkins reforms of the Hawke Government and the Bradley Report of the Rudd Government all sought to remake higher education so that Australia and Australians could thrive in rapidly changing economic and social circumstances.

Running against this tide of nation-building, more recently, are views that our public universities are cost centres to be made more efficient and controlled through policy micromanagement. The resulting ever-growing mountain of regulatory red tape diminishes institutional autonomy, the student experience, constrains innovation, restricts Australia's competitiveness and diverts resources from what should be the core activities of teaching, research and knowledge diffusion.

The contribution that scholars in Australia's public universities and their affiliated research institutions made to the national and global effort to combat COVID-19 demonstrated the value of long-term investment in expertise and sovereign research capability. However, the pandemic also showed that insufficient investment over many years left Australia vulnerable, dependent on help from overseas and at the whim of global supply chains due to our limited local manufacturing capability.

Just as previous Commonwealth governments saw universities as key to navigating Australia through challenging times, Australia now needs to grapple with the momentous shift underway to a post-industrial, low-carbon, digital era. Strengthening our education and research systems will provide vital foundations and tools to ensure that Australia and its citizens have prosperous and secure futures.

As we emerge from the disruption of the pandemic, the Australian Universities Accord provides a unique opportunity to take stock of where we stand as a country. It is an opportunity to think afresh about where we want Australia and its tertiary education system to be in 10, 20 and 30 years. The Accord is a chance for all stakeholders to come together to ask why previous ambitious proposals to reform Australia's tertiary education system were not fully realised; to develop bold solutions and map a path for how the system will contribute to the transformation required for success.

It is time again for new aspirational nation-building that places visionary and enduring reform of tertiary education at the heart of Australia's future.

As Australia's first public university we look forward to working with the Accord Panel to find solutions to the many challenges and opportunities facing Australia and its tertiary education sector.



Belinda Hutchinson AC
Chancellor



Professor Mark Scott AO
Vice-Chancellor and President

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Acknowledgement of country

The University of Sydney's campuses and facilities sit on the ancestral lands of many of Australia's First Peoples, who have for thousands of generations exchanged knowledge for the benefit of all. These include the Gadigal, Gamaraygal, Dharug, Wangal, Tharawal, Deerabbin, Darkinyung, Guringgai, Gamilaraay, Barkindji, Bundjalung, Wiradjuri, Wiljali, Ngunawal, Gureng Gureng and Gagudju Peoples.

Respectfully acknowledging the ancient learning cultures and traditions of Aboriginal and Torres Strait Islander peoples, the University of Sydney declares its commitment to the continuation of this sharing through the agency of our work. There is no part of Australia where we work that has not been loved, nourished and cared for since the beginning of time.

12 nation-building ideas

Vision statement summary

By 2040 Australia is among the top 10 most educated, skilled and innovative countries globally.

We support individuals of all backgrounds to thrive, make a difference to their communities and contribute to a diversified, advanced economy throughout their adult lives.

We are known for our research creativity and innovation—sustaining high-value industries and jobs, enhancing productivity, and supporting a healthy, tolerant, and cohesive society.

Access and opportunity

1. Provide holistic personalised income support for underrepresented students.



2. Launch a national network of partnerships between schools, vocational and higher education providers to level up educational opportunity.



3. Boost equity through a scholarship scheme co-funded by the public and private sectors.



Education and skills for the future

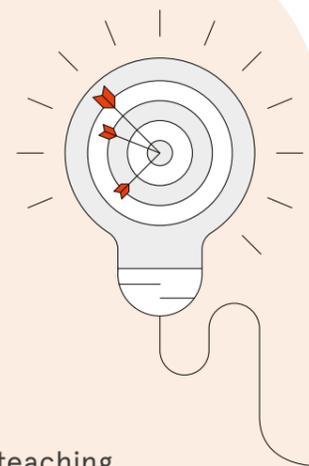
4. Develop a national tertiary education ecosystem to underpin lifelong learning.



5. Re-imagine the teaching and student experience to deliver the rapidly evolving knowledge and skills society needs.



6. Leverage education and research to build new partnerships to lift capability in the Asia-Pacific.



Delivering new knowledge, innovation and capability

7. Ensure Commonwealth funding covers the full economic costs of prioritised research.



8. Identify and appropriately fund non-biomedical research priorities.

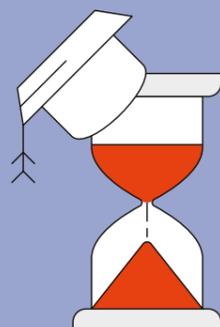


9. Incentivise private sector investment in R&D and facilitate porosity between sectors.

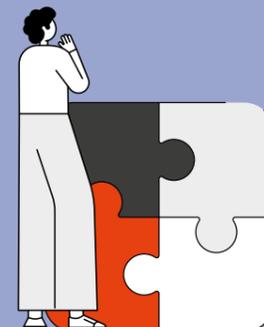


Policy making, governance, regulation, funding and performance

10. Create an independent Australian Tertiary Education Accord Commission to support reform, boost access and reduce red tape.

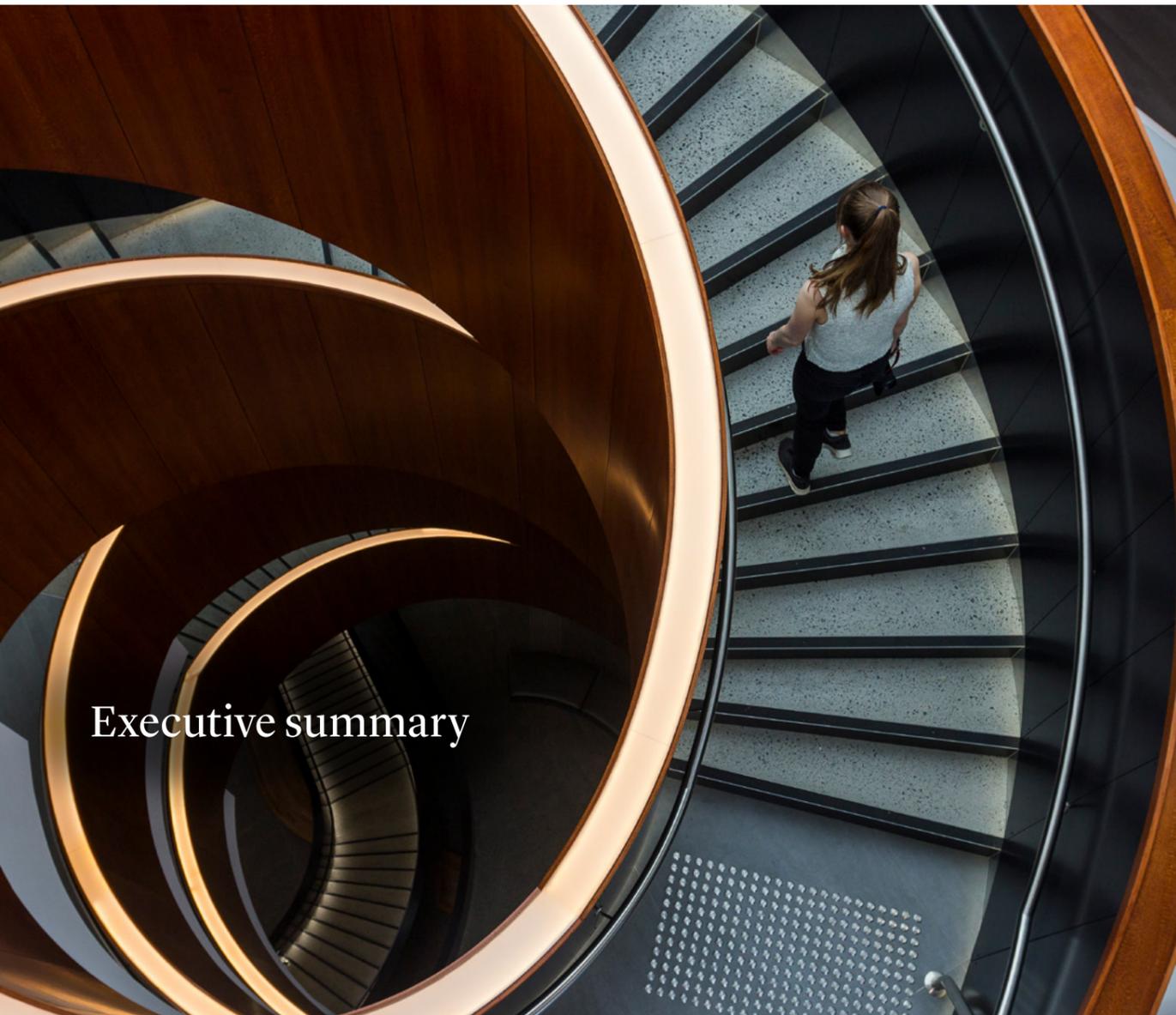


11. Drive provider diversity and specialisation through regulatory and funding reform.



12. Strengthen cooperation between the Commonwealth, states and territories to drive agreed reforms in each jurisdiction.





Executive summary

We open this submission by reflecting on the integral role that higher education reform has played in previous Australian governments' nation-building strategies since World War II.

To frame and direct our contribution, we offer a possible vision for the sector's future in 2040, as an integrated national tertiary education system, featuring institutions with diverse teaching and research specialisations, which together are delivering a seamless spectrum of educational opportunities for all those seeking educational qualifications, regardless of their backgrounds. Under this vision, unlike today, access to and support for students seeking educational opportunities is something that individuals can rely upon and obtain easily throughout their lives.

We discuss briefly the forces and megatrends shaping Australia's future and seek to demonstrate why it is time – again – for new ambitious nation-building, which places visionary reform of tertiary education at the heart of Australia's future.

In response to the Accord Chair's call for big and bold ideas, we outline 12 nation-building ideas for consideration by the Panel as possible recommendations to the Commonwealth. These 12 ideas emerged from consultations we held with our community since the Accord Panel's first call for submissions in November 2022. Grouped according to the Accord's key terms of reference, they are, in short:

Access and opportunity (Ideas 1-3)

- Suggestions to flip the Commonwealth's approach to student income support following a dedicated independent review, to encourage philanthropic and business giving to support equity scholarships, and to foster deeper and sustainable school, VET and university partnerships to help uplift teaching and learning outcomes in schools.

Education and skills for the future (Ideas 4-6)

- An overarching proposition to realise, finally, the vision shared by the Dawkins and Bradley reviews for a coherent and highly functioning Australian lifelong learning ecosystem.
- Proposals to reimagine the future of teaching and the student experience, and of the role that international students and development partnerships can play in addressing future skills needs, while strengthening peace and security in the Asia-Pacific and beyond.

Delivering new knowledge, innovation and capability (Ideas 7-9)

- Ideas to make Australian university research more sustainable, competitive and impactful, unlocking revenue to boost the learning experience for all students, and to provide targeted wrap-around support for students throughout their tertiary education learning journeys.
- By implementing these proposals as part of the national reconstruction effort, Australia has a much stronger economy with better jobs for its people, an enhanced domestic manufacturing and value-adding capacity in areas including medical science, clean energy, defence – all supported by world-class enabling capabilities across the disciplines.

Policy making, governance, regulation, funding and performance (Ideas 10-12)

- Proposals for structural reforms to improve the way Australia develops and implements tertiary education policy, starting with the creation of an independent Australian Tertiary Education Accord Commission (ATEAC).
- Operating under the National Cabinet and a new era of *cooperative federalism* and goal setting for each state and territory tertiary education system, the ATEAC would provide an enduring home for the Accord process. Over time, the ATEAC would become responsible for the detailed, evidence-based, research, consultation and policy design work that will be needed over the next 20 years to implement the Accord Panel's recommendations.

We recognise that most of the policy issues the Accord Panel is grappling with are complex and interlinked. Many of the key problem areas the Accord has identified to date require time to allow for detailed investigation and consideration to understand all the relevant issues, identify possible policy solutions, model their costs, and assess the likely consequences different solutions may have for the system.

Nevertheless, there is an urgent need to revise the HECS-HELP framework established by the former Government's Job-ready Graduate (JRG) policy, which has, since 2021, had disproportionate consequences for women and Aboriginal and Torres Strait Islander students. This policy has been a conspicuous failure in delivering change in student study choices. It has entrenched financial incentives for providers and the Commonwealth itself to not allocate places in high-cost fields like medicine, veterinary science, dentistry, agriculture, engineering, lab-based sciences and other fields where Australia has growing skills shortages.



The other JRG-related priority actions we encourage the Accord Panel to consider in short-term are:

- **Recommendation 1:** Place a pause on the application of the Low Completion Rate Rule for domestic students' continued access to Commonwealth support. This would allow time for targeted consultation with students and providers about the measure before the start of the 2024 academic year, to understand its implications for students, particularly those from underrepresented groups, and for institutions in terms of complying with the legislative requirements. A pause would also provide time to consider alternative policy options that would achieve the desired objectives, with fewer unintended consequences for students and providers.

- **Recommendation 2:** Consult with experts from the sector to investigate all available options to maximise the flexibility that universities will have over the period 2024-2026 to respond to changing demand from students, while keeping the total cost of the Commonwealth Grant Scheme within the Government's budget envelope. This is needed because the current application of Maximum Basic Grant Amounts (MBGAs) at the provider level is not working efficiently to match available funding with changing student demand. Through dialogue and cooperation between the Accord Panel, the Department of Education and the sector during 2023, there is potential to devise a much better approach, which meets the Government's short-term fiscal and equity priorities, while also giving universities the funding certainty and flexibility they need to operate effectively. We would be pleased to provide further thoughts on this suggestion, in collaboration with other providers.

- **Recommendation 3:** Commission an independent review of the Transparency in Higher Education Expenditure annual costing exercise, as a mechanism for setting current and future base funding rates under the Commonwealth Grants Scheme for equivalent full-time Commonwealth-supported students.

To address this situation in the immediate term, we encourage the Accord Panel to consider recommending to the Commonwealth that it introduce legislation to take effect from 1 January 2024, which recalibrates student contribution amounts based primarily on the predicted average lifetime private benefits of graduates from different disciplines. It may be possible to develop a budget neutral and grandfathered model over the forward estimates, with the following features:

Proposed new student contribution bands	Field of Education
Band 1 - Lower private benefit	Teaching, Nursing, Social Work, others
Band 2 - Mixed private benefit	All other fields and most students pay
Band 3 - Higher private benefit	Medicine, Dentistry, Engineering, Law, others

- **Recommendation 4:** Alongside recommendation 3, establish a Sustainable University Research Expert Working Group to develop an agreed, evidence-based approach to full-economic costing of Australian university research that can be applied across all disciplines.

- **Recommendation 5:** Not continue with the former Government's National Priorities and Industry Linkages Fund (NPILF) and Performance-Based Funding Scheme and consider redirecting the funding from these programs to progress the Albanese Government's priorities, informed by recommendations from the Accord Panel.

Vital longer-term reforms are also needed to better position Australia to thrive. The Commonwealth's failure to deliver on so many of the Bradley Review's recommendations that were supported by the

Rudd and Gillard governments demonstrates that a different approach to implementation of the Accord's recommendations will be critical.

Given the complexity of the issues and length of time required to plan and implement necessary reforms, we think one overarching solution must lie in the Commonwealth, state and territory governments acknowledging that a fundamentally different approach is required if major changes to Australia's tertiary education and research systems are to be realised over the next 20 years.

This is why an immediate policy priority is that the Accord Panel consider recommending to the Commonwealth that it work with the states and territories to develop by 1 July 2024, a detailed proposal for an Australian Tertiary Education Accord Commission (ATEAC), as a key a tool for developing and delivering agreed reform of Australia's tertiary education system over the next 20 years.



A vision for the future of Australian tertiary education

By 2040 Australia is among the top 10 most educated, skilled and innovative countries globally.

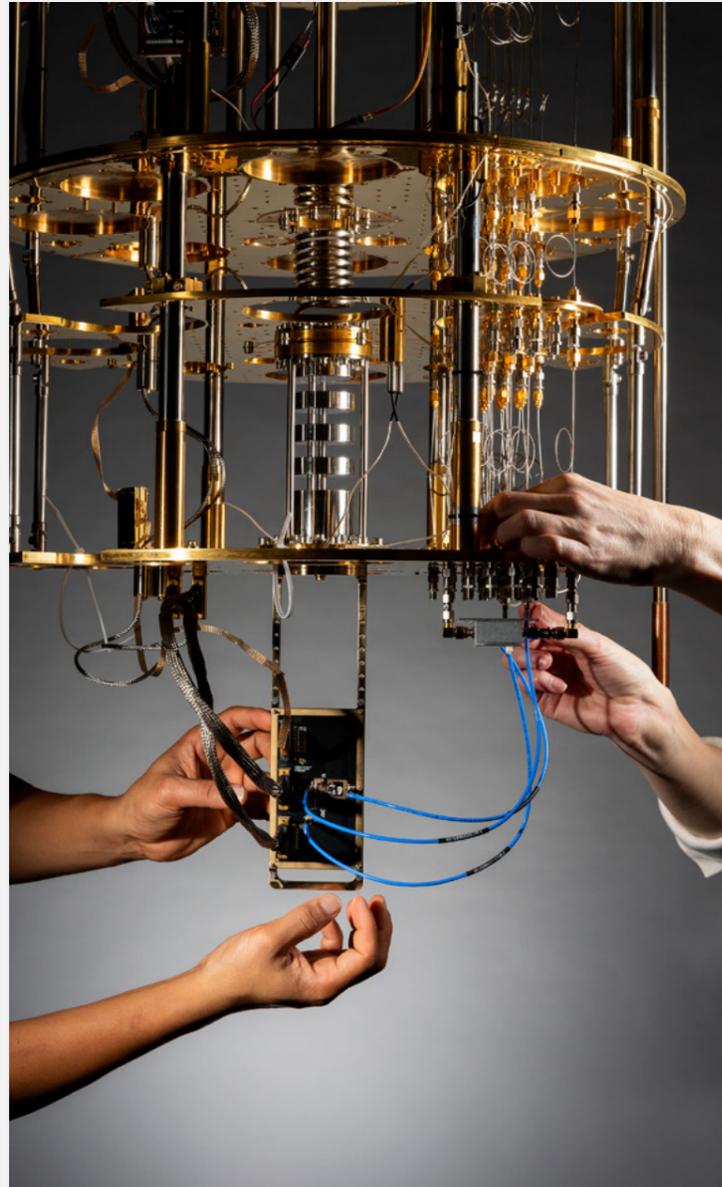
We support individuals of all backgrounds to thrive, make a difference to their communities and contribute to a diversified, advanced economy throughout their adult lives. The cultures and knowledges of Aboriginal and Torres Strait Islander peoples are central to our unique approach to learning.

We are known for our research creativity and innovation – sustaining high-value industries and jobs, enhancing productivity, and supporting a healthy, tolerant, and cohesive society. Our research students graduate to pursue rewarding careers in industry, government, research institutes and universities in Australia and around the world. They can move easily between these sectors, transferring knowledge and deepening partnerships.

Our research institutions are active members of leading global partnerships, tackling the biggest problems and opportunities facing the planet and humanity. We are known for bringing our disciplines together in creative ways to provide solutions to the grand challenges of our time, and for investing in the foundational enablers required for multidisciplinary problem solving.

Our high-quality tertiary education offerings attract students from all over the world, shaping graduates who are sought after in Australia and overseas. Our international students graduate to contribute valuable perspectives and skills both to Australia and their homelands, sustaining a powerful network that enables trade, sustainable development, regional peace and understanding between individuals and nations. All students, whether domestic or international, are able to broaden their horizons and become comfortable working across different cultures.

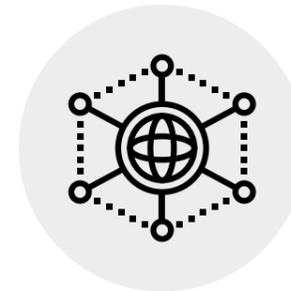
These outcomes are the direct result of a new integrated national tertiary education system and enduring Accord process commenced in the 2020s, which brings together the full landscape of vocational and higher education institutes into a single system. Under this system, the nation benefits from a seamless spectrum of educational opportunities that individuals can access over the



course of their lifetimes, and a diversity of research specialisations. It is a system that works in close partnership with governments, businesses and non-government public organisations to understand and deliver the skills, knowledge, research and innovation most needed by the nation, local communities and industry.

The need for change: the changing global context and the challenges facing Australia and its tertiary education and research system

The megatrends shaping Australia's future



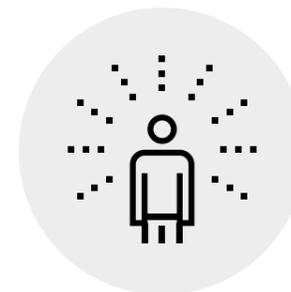
Impactful technology



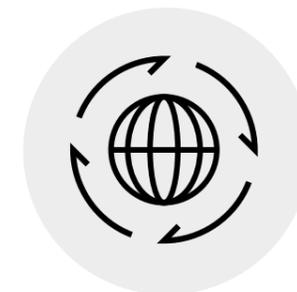
Demographic change



Rapid urbanisation



Accelerating individualisation



Economic power shift



Climate and resource security

Figure 1: Megatrends

Sydney Business Insights, University of Sydney Business School

The CSIRO, NSW Treasury, the Business Council of Australia and others, including some of our own researchers (see Figure 1), have recently identified the megatrends Australia will need to navigate over coming decades.¹

Australia is not alone in grappling with these trends and forces, but our experts and others tell us that we face distinct challenges and opportunities due to our unique circumstances. These include the consequences of climate change in the form of more frequent droughts, floods and bushfires; our proximity to Asia where the middle class is predicted to grow to 3.5 billion people

by 2030; and our need to strengthen our economy by continuing the shift away from a dependency on resource extraction and 20th century industries, to a more diverse and complex industry mix, featuring high-value knowledge-based sectors and jobs.

Our tertiary education sector has a vital contribution to make – through its role in skills development, but also in underpinning the nation's intellectual capital and capacity to establish, at short notice, the world-class multidisciplinary research teams needed to help solve complex problems.

Australia's global research contribution

673,731

scholarly outputs were published by Australia between 2016 and 2021
~3.3% of the scholarly output worldwide

Australia's citation impact is ¹

1.6

This means that Australia's research is cited 60% more than expected in the world
World average = 1.0



of Australia's scholarly outputs were published with an international collaborator 2016-2021, reflecting the global nature of Australia's research
World average = 21%

Source: *Australia in the global research landscape and Elsevier in Australia* report (Elsevier, March 2022).
1. Refers to Australia's Field-Weighted Citation Impact (FWCI).

Figure 2

Key challenges and opportunities facing Australia's tertiary education system

Australia has a globally competitive higher education system of which it can be proud. We punch well above our weight.² The system has played a vital role in each phase of economic transition since World War II and its millions of graduates have underpinned the economic shifts the Hawke Government of the 1980s saw as vital to Australia's prosperity.³

As **Figure 3** shows, since the early 1990s, by far the strongest employment growth in Australia's has occurred in the service sectors and in roles that require higher level skills and qualifications. Australia's services sector now accounts for 90 percent of workers – affecting the skills required by the economy.⁴

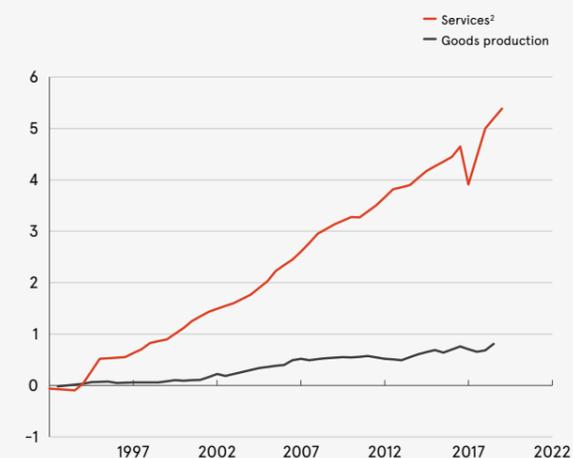
Research shows that people with a bachelor's degree or higher achieve better employment and lifetime earning outcomes than those without such qualifications.⁵

Growing access to higher education has facilitated social mobility, strengthened social cohesion and the operation of our democracy.

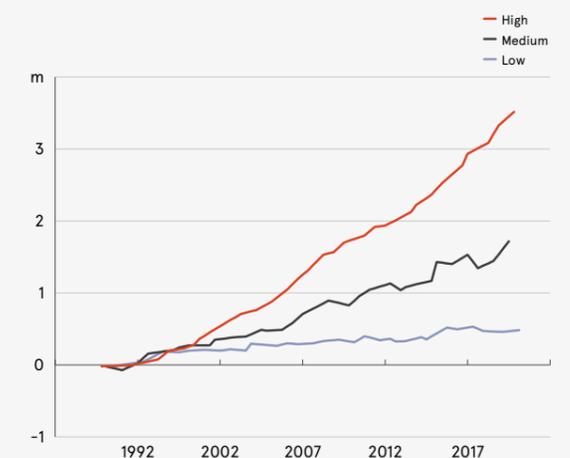
Look deeper, however, and many issues and trends should raise alarm about our tertiary education sector's capacity to continue delivering the outcomes Australia needs, particularly in the face of key forces transforming the sector. These include the globalisation of higher education and research, major demographic shifts worldwide, the influence of artificial intelligence (AI) and autonomous systems, and increasing demand for lifelong learning enabled by the internet and other digital advancements.

We must also consider how we best support the careers of Australian academics. This includes thinking deeply about what the Australian PhD will need to look like in 2030 and 2040 if we are to ensure our teaching and research remain strong, and that Australia's diversified and increasingly knowledge-based industries have access to the higher-order skills they will need to remain competitive.

Employment by industry¹
Cumulative growth since August 1991



Employment by qualification requirement³
Cumulative growth since August 1991

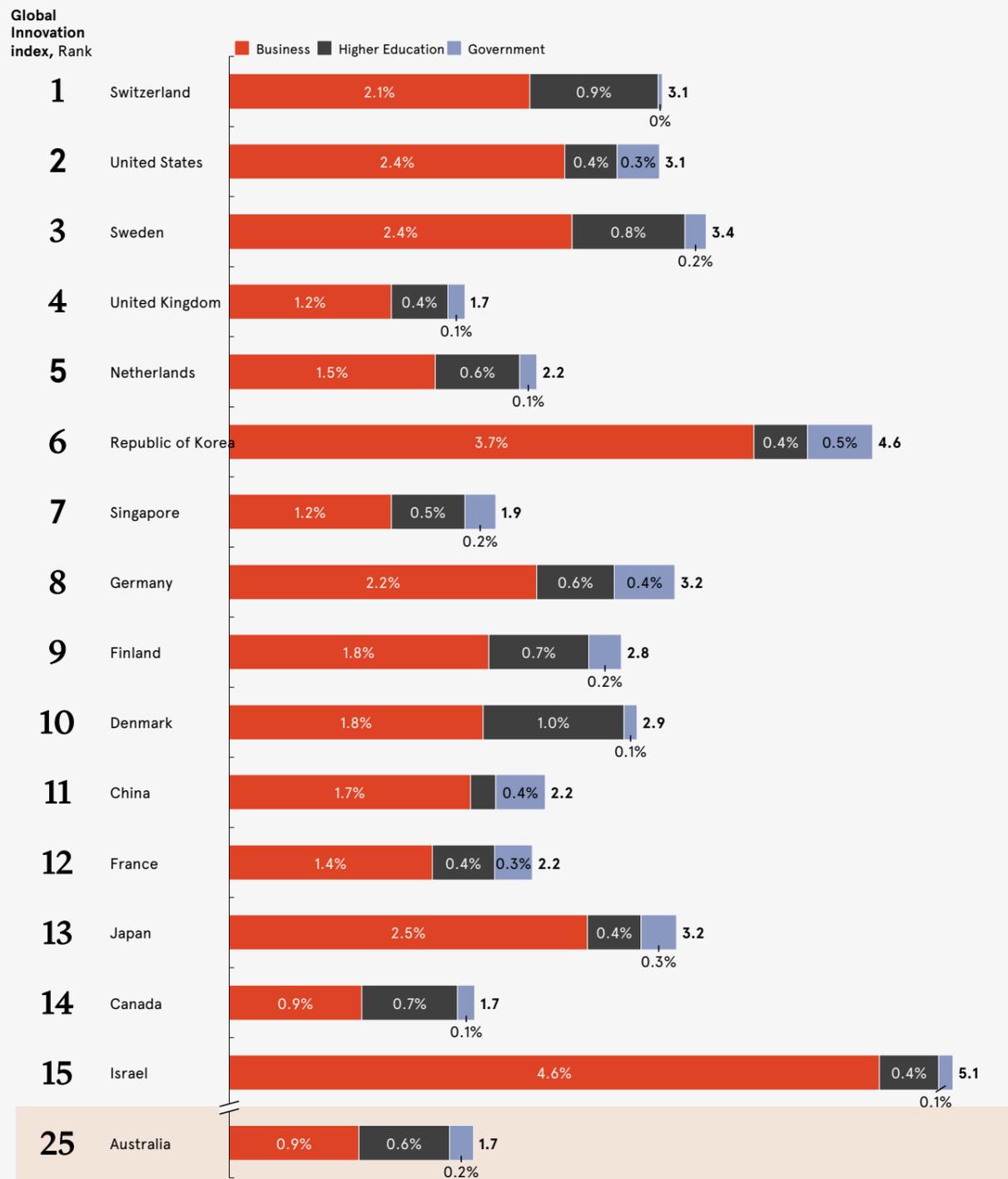


1. Excludes agriculture, forestry & fishing 2. Also includes public administration & safety and goods distribution 3. Categories are based on occupations (as defined in ANZSCO) that require skill levels commensurate with certain levels of education, training or experience; "high" indicates Diploma of higher or equivalent experience; "medium" indicates Certificates II to IV (as defined by the Australian Qualifications Framework) or equivalent experience; "low" indicates certificate I or compulsory secondary school education Source: ABS, RBA

Figure 3

Countries that rank highly on innovation have significantly higher business expenditure

Expenditure on R&D as a percentage of GDP, %¹



1. Includes business (BERD), higher education (HERD), and government (GERD)
Source: OECD, 2020; Global Innovation Index 2022 Rankings

Figure 4

Strengthening our economy's competitiveness

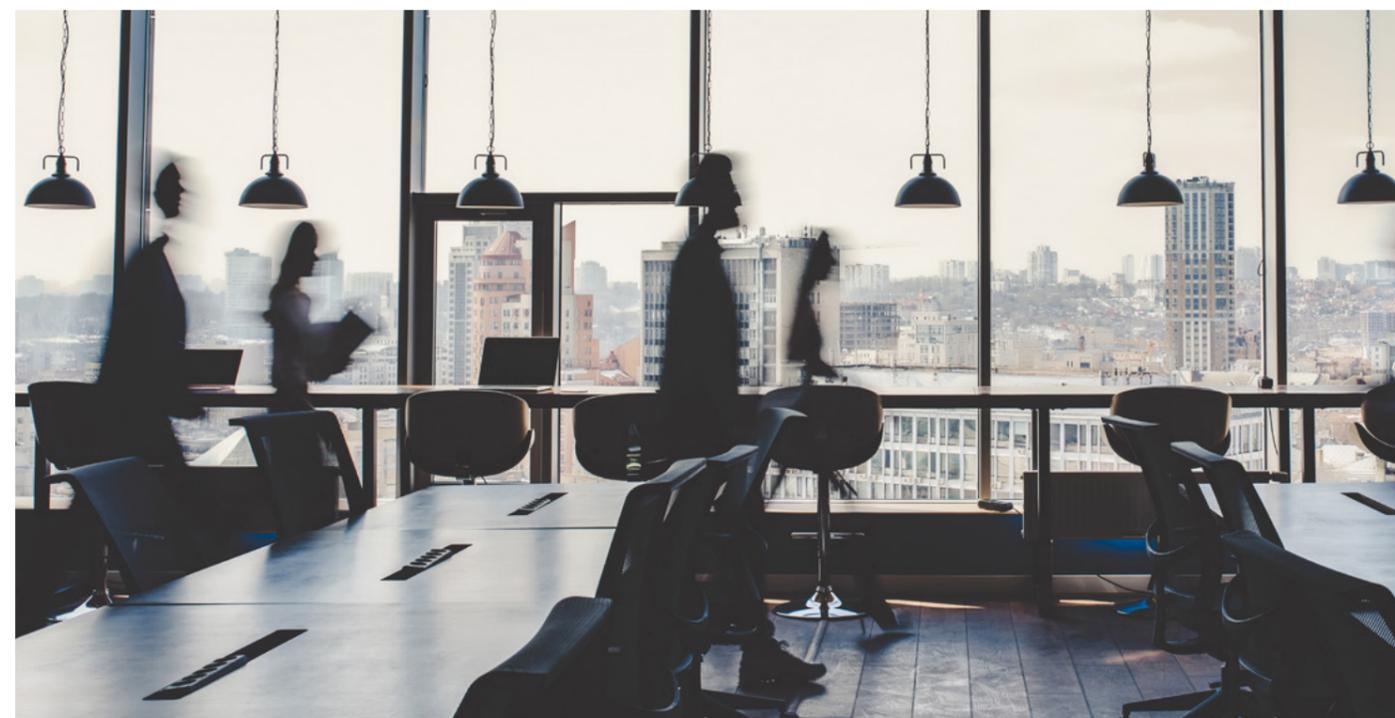
As **Figure 4** shows, many of the world's most innovative countries have significantly higher R&D expenditure than Australia, driven principally by business investment. Australia ranks 25th in the OECD's Global Innovation Index and 37th for knowledge and technology outputs. Our national capacity for research matters because it underpins the new knowledge creation critical for innovation and new business formation, which in turn improves productivity and economic complexity. Many studies have demonstrated the strong returns that flow from investment in research. We have productivity and competitiveness problems.

The Albanese Government's aspirational commitment to increase Australia's R&D investment to at least 3 percent of Gross Domestic Product is welcome. However, due to decades of under-investment, most Australian universities, including the University of Sydney, rely heavily on income from international students to cover

the full costs of research projects prioritised by the Commonwealth.

The Job-ready Graduates (JRG) package's effective separation of funding for higher education teaching and research, combined with adoption of stronger minimum research standards for university status, have exposed a major structural gap in the way Australian university research is funded.

The previous Government recognised the significance of the problem by providing an extra \$1 billion in funding under the Research Support Program (RSP) in 2021. However, this increase did not continue, and the gap between the value of the RSP and universities' externally sourced income for research projects has continued to grow. Previous governments' abolition of both the Education Investment Fund (EIF) and the Capital Development Pool, also mean that there is no longer a dedicated Commonwealth funding source to invest in transformational teaching and research infrastructure in Australian universities.





must work long hours each week to meet their living costs, which significantly impacts their studies.⁷

Higher education tuition fees were covered by the Commonwealth for all eligible students from the 1970s to 1989 when HECS was introduced at a flat rate of \$1,800 per year. Today, many students will graduate from undergraduate degrees with debts of \$40,000–\$75,000. With female and Aboriginal and Torres Strait Islander students strongly represented in the fields that now have higher student fees, they are affected disproportionately, with flow-on implications for life choices following graduation.

Responding to changing skills needs

Australia faces major workforce and skills shortages in many areas requiring tertiary qualifications. These are predicted to continue in the future. The Productivity Commission has recently called for greater policy attention to incentivise and drive quality and responsiveness to the changing needs of employers and students.⁸

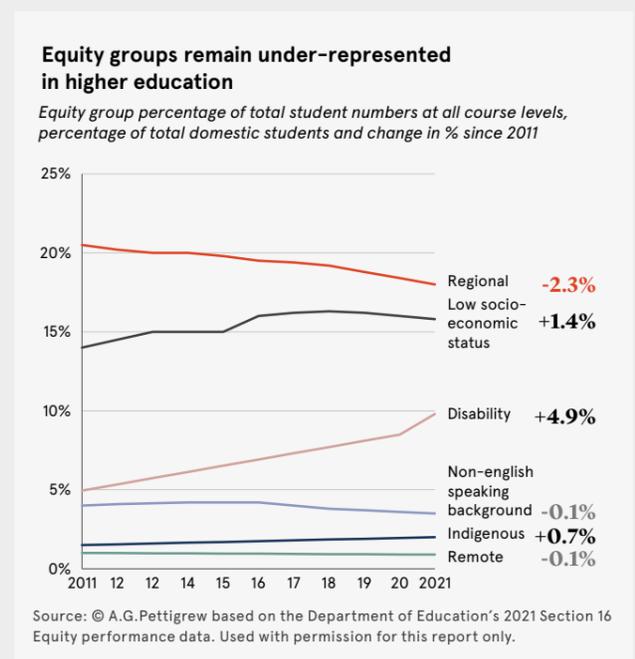


Figure 5

Access, opportunity and student finances

Each year around 110,000 Australians do not successfully transition to post-school education, training or work by the age of 24. With nine in 10 new jobs expected to require a tertiary-level qualification, these people are at higher risk of being left behind.⁶ Despite the Bradley Review's focus on lifting equity of participation in Australia's higher education, the share of students from most underrepresented groups has not improved significantly, as shown in Figure 5.

The income-contingent Higher Education Loans Program (HELP) removes course fees as an upfront barrier to participation. Cost of living pressures, however, are acute and growing for many students, whether eligible for income support or not. Increasing numbers of students

Meeting future demand

Demand for tertiary education is expected to grow strongly in Australia over the next 10 years at least. However, the way we structure and fund access to our vocational and higher education institutions remains based on ideas and models developed for a different era. Since the 1990s, successive Commonwealth governments have chosen to grow the higher education system by using policy to incentivise existing universities to increase massively in size, rather than establish new, smaller and specialised institutions of the type that are more common in competitor countries.⁹

Critical Work Integrated Learning (WIL) shortages

Australian universities currently face significant challenges, increasing the supply of graduates to many professions, because of insufficient quality work integrated learning placements for their students. The challenges are most serious across the health professions, but also affect teaching, engineering, veterinary science and other fields. Constraints on supply of placements for domestic students limit the capacity for institutions to diversify and grow their international enrolments into these fields, even though there is strong demand from students in many countries.

Quantity over quality

There is little in the current higher education funding framework that incentivises providers to improve the quality of their teaching and of the overall student experience. On the contrary, the system currently incentivises providers to increase the volume of domestic students enrolled in lower-cost areas to offset funding shortfalls in others. As a result, student to staff ratios in many fields of education have increased significantly. Meanwhile, the funding model strongly deters universities from enrolling students in high-cost fields like veterinary science, agriculture and dentistry, while places for medical students remain strictly controlled by the Commonwealth. Attempts at performance funding over the last decade have been piecemeal and not developed in close consultation with providers. In research and research training, block funding is driven by the quantum of external research income earned and the number of Higher Degree by Research (HDR) student completions, rather than any robust measures of quality and impact.

Red tape burdens

As Appendix A shows, the University of Sydney's legislative compliance register records 333 legislative instruments and associated documents, of which 142 impose significant compliance burdens. Although this range is partly due to the breadth of the University's activities, many of the most critical compliance obligations apply only, or mainly, to higher education providers and research institutions. The multi-jurisdictional and overlapping regulatory and reporting framework covering Australian universities is duplicative and adds unnecessary complexity and administration costs.

New compliance requirements are added every year, rarely with serious regard given to regulatory impacts, and never with recurrent funding provided to assist with the costs of compliance imposed. For example, according to the Federal Register of Legislation the *Higher Education Support Act 2003 (Cth)* is currently 624 pages, compared to 220 pages in 2004. A simplified regulatory and funding environment, and a single agreed reporting framework between the Commonwealth and state governments, would generate significant savings that could be reinvested in universities' core teaching, research and engagement activities.

With our proposed long-term vision and this context in mind, we have developed 12 ideas for consideration by the Accord Panel, grouped under the following four themes:

- Access and opportunity
- Education and skills for the future
- Delivering new knowledge, innovation and capability
- Policy making, governance, regulation, funding and performance



12 nation-building ideas



thousands of students. However, the Bradley vision of Australia shifting to a system capable of responding to the circumstances of each student remains unrealised.¹¹

Cost-of-living pressures are significant and rapidly growing for students everywhere today due to interest rate hikes, rent increases and high inflation lifting the cost of essential goods and services.¹² The barriers and pressures are highest in the major metropolitan areas, and for students who need to move to these centres from regional areas or interstate.¹³ For example, the maximum income support available for full-time students in Sydney falls well short of the minimum cost of living independently, and places them below the poverty line.¹⁴ Our current advice to single students living away from home is that they need \$1,754 to survive each month (\$21,048 annually).¹⁵

Some students can access other forms of assistance but most must work to make ends meet.¹⁶ While it is reasonable and valuable for full-time students to work for 10 to 15 hours a week, anything more may have negative consequences for students while studying and after graduation in competitive labour markets.

Australia's student income support system was last reviewed in 2011. The Senate Community Affairs References Committee recommended an independent review in 2019, but this did not happen.¹⁷

While the accuracy of the way we estimate a student's socioeconomic status has improved, our approach remains generalised and postcode-based.¹⁸ The introduction of the Unique Student Identifier (USI) and other digital advances should now allow for data to be linked across Commonwealth departments to provide an accurate picture of the circumstances of each Australian student throughout their lifelong learning journey.

To lift access to tertiary education, we encourage the Accord Panel to consider recommending to the Commonwealth that it commit to a long-overdue independent review of student income support. We suggest a comprehensive review that considers a range of factors and is driven by evidence about the actual and evolving costs of living in different parts of Australia.

There is a critical need, for example, to consider support for students who must complete lengthy unpaid clinical and other placements as a requirement of their courses, and for registration in their chosen professions. With access to tertiary education now so vital to success in the workforce, and ever-fewer students eligible to receive sufficient payments due to the parental means test's thresholds, it is also time to look afresh at whether keeping the Youth Allowance age of independence at 22 remains appropriate.



2. Launch a national network of partnerships between schools, vocational and higher education providers to level up educational opportunity

Despite more than a decade of focused effort and investment, today's average Australian Year 9 student is more than one year behind in mathematics compared to in 2000. For reading the decline is around 9 months. The learning gap between students from advantaged and disadvantaged backgrounds more than doubles between Year 3 and Year 9.¹⁹

Far too many young Australians still do not make successful post-school transitions, resulting in significant costs for them, the community and future governments.

Improving access and equity from early childhood education must be at the forefront of addressing this problem because the structure of our education system enables better-off people to access more and better educational opportunities from the earliest years of life.

New incentives to retain and retrain existing teachers and create affordable teacher education pathways are needed to fill critical teacher shortages. The workforce challenges are especially acute and predicted to worsen in STEM fields and in schools serving lower-socioeconomic communities in outer-metropolitan and regional, rural and remote areas.

Another problem is negative perceptions towards teaching as an attractive career among high-performing secondary school students, compared to other study and career options. Furthermore, many graduate teachers do not stay in the profession long-term.

There is therefore an urgent need for all key stakeholders to double down to work together to find ways to lift learning outcomes in our least advantaged schools, including by increasing the supply of quality graduates from initial teacher programs to these schools.

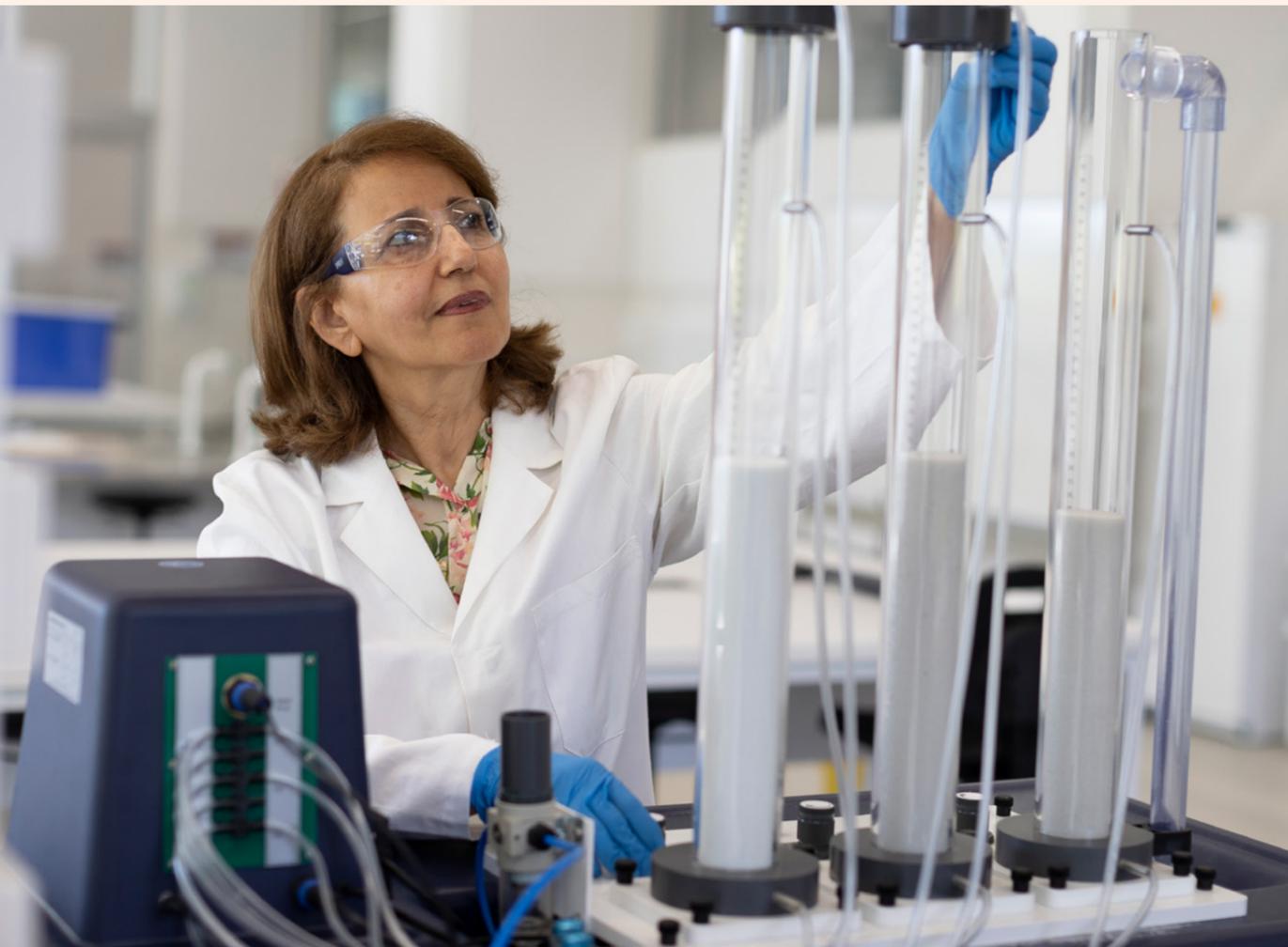
Access and opportunity

1. Provide holistic personalised income support for underrepresented students

Nine in 10 new jobs in the Australian economy require a post-school qualification. Yet the ability to meet basic living costs while studying remain key barriers to access and success in tertiary education for too many students.¹⁰

Tertiary students experience unique challenges and barriers depending on their personal circumstances such as culture, age, location, access to financial support etc. In Australia and globally, people accessing tertiary education are increasingly the first to do so from their families, are doing so later in life, and after journeys that may have started overseas under onerous circumstances arising from, for example, geopolitical tensions or climate change.

The Bradley Review made detailed recommendations to improve the student income support system, many of which were implemented and benefited tens of



In 2014, the National Centre for Student Equity in Higher Education (NCSEHE) published a report showcasing 31 partnerships between Australian tertiary education providers and schools, many supported through the Higher Education Participation and Partnership Program (HEPPP). The report explored the characteristics of successful school/tertiary institution partnerships in Australia and overseas to provide an evidence-based framework for use by policy makers and practitioners to apply to maximise successful outcomes.²⁰

One of the programs featured in the NCSEHE report was Bridges to Higher Education, which ran from 2011 to 2014 as a collaboration between five NSW universities, TAFE NSW and more than 300 schools with funding support of \$21.2m from the HEPPP. The Bridges program was evaluated by KPMG in 2015, which found that it was clearly contributing to its objectives of improving pathways to higher education for students from underrepresented groups. In terms of improving academic preparedness and outcomes, students and teachers noted improvements compared to before the existence of Bridges: the 3550

teachers surveyed estimated that 99 percent of students involved in the programs had improved academically based on teacher assessment.²¹

Unfortunately, HEPPP funding was cut substantially around 2015, meaning that programs like Bridges and many others featured in the NCSEHE report could not continue. A reinvigoration of the HEPPP would enable eligible schools to develop deep and bespoke long-term and sustainable partnerships with vocational and higher education providers, to address their most critical teaching and workforce challenges. The partnerships would enable opportunities for engagement in diverse disciplines – from the natural sciences, engineering and health sciences, to the humanities, social sciences, and the arts.

The Commonwealth would set and monitor outcomes from these academic partnerships through mission-based compacts with participating universities, with the potential to leverage cooperation from state and territory governments through the bilateral agreements made under the National Schools Reform Agreement.

3. Boost equity through a scholarship scheme co-funded by the public and private sectors

We propose that the Accord Panel consider recommending to the Commonwealth that it announce a three-year trial program, under which gifts and business payments made to suitably established equity scholarship endowments will be matched by the Commonwealth, up to a capped amount, provided that the relevant State or Territory government agrees to match the Commonwealth's contribution.

Our experience shows that donors are attracted to funding initiatives that respond to grand challenges, and the case for providing equitable access to higher education is one such challenge. Drawing on international precedents, we are confident that such a scheme would encourage donors and businesses to give, knowing that their donation has government support, and will deliver even better outcomes when matched with additional funding.

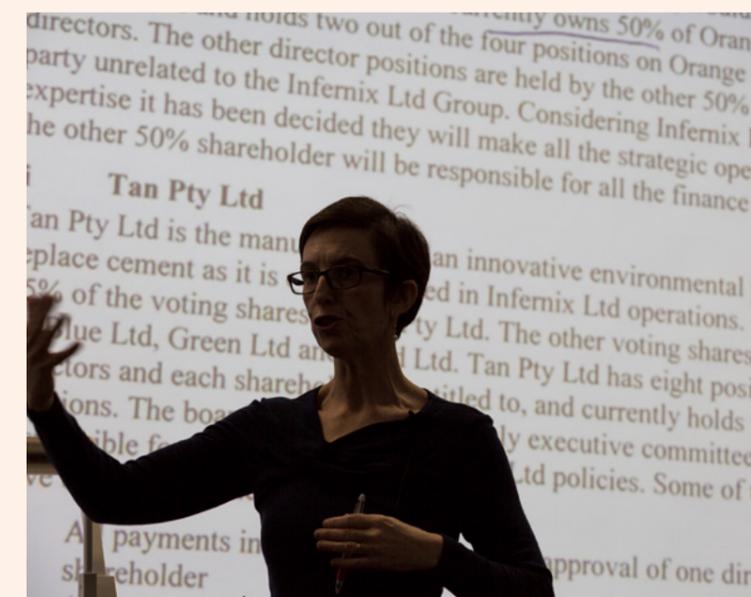
In Massachusetts, the Government's Public Higher Education Endowment Incentive Program was established in 1996. Between 1997 and 2007, the \$US54 million provided by the scheme helped leverage another \$US100 million from donors, which comprises more than \$275 million of University of Massachusetts' endowment today. This fuelled the establishment of more than 70 endowed professorships and chairs, and numerous scholarships.

This proposal would build on the (unimplemented) Bradley Review's recommendation that the Australian Government provide funds of up to \$200 million over three years to match new philanthropic donations received by the sector.²²

The scheme could work as follows:

1. Philanthropic funds would be raised by the institution, for example, \$10 million.
2. The Commonwealth would match that amount dollar-for-dollar for metropolitan institutions and \$1.50 per dollar for regional providers.
3. The relevant state or territory government would match the Commonwealth contribution.
4. The institution would then hold, for example, \$40 million (for a regional institution) for student equity scholarship support.
5. With a prudent annual distribution rate of 5 percent, this capital would produce \$2 million annually to support targeted equity scholarships.
6. If the scholarships were set at around \$9,150 CPI-indexed per annum, this would realise around 80 new scholarships for students commencing with the institutions each year.

If continued well beyond the pilot, the Accord's legacy could be the establishment of a permanent and growing pool of thousands of equity scholarships nationally. The value of these scholarships could also be increased if the Commonwealth lifted the cap on income from such sources under the student means tests for Youth Allowance, Austudy and Abstudy.



Education and skills for the future

4. Develop a national tertiary education ecosystem to underpin lifelong learning

We encourage the Accord Panel to consider recommending to the Commonwealth that it begin the detailed planning work needed to deliver the unrealised vision of past Australian governments for a national tertiary education system to support lifelong learning.

“The principle of lifelong education is now accepted as fundamental to achieving social, cultural, technological and structural change, and to our future economic development.”

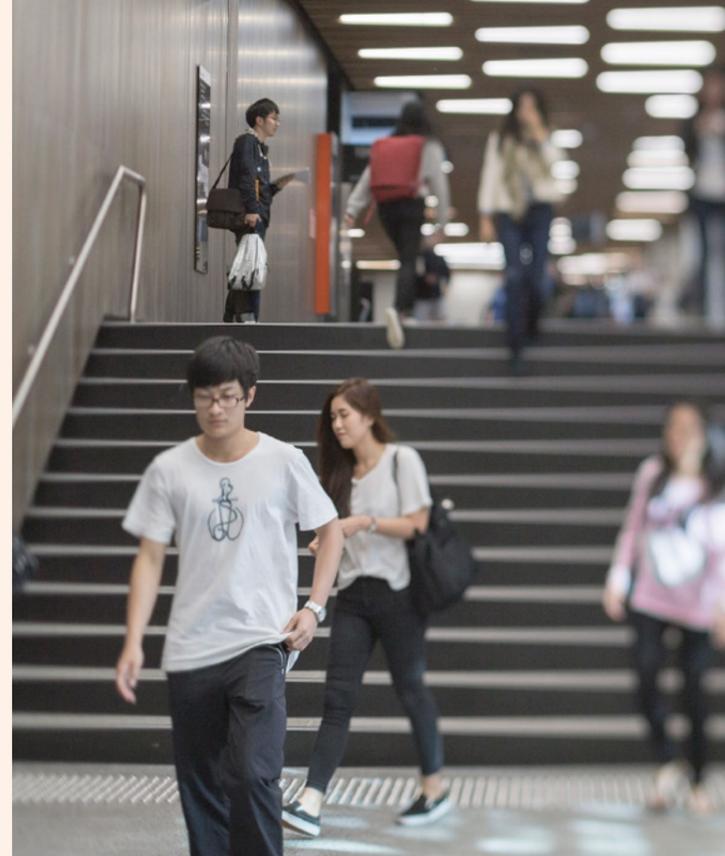
John Dawkins, Higher Education: A policy statement, 1988, p.68

“We need to turn the rhetoric of lifelong learning into a reality. A well-coordinated, systematic approach to addressing these complex issues and increasing the numbers gaining qualifications is vital.”

Bradley Review Report, 2008, p.xii

With Australians living and working longer than ever before and the access age for superannuation and the aged pension increasing, lifelong learning will be essential if individuals are to lead fulfilling lives in the face of the global megatrends and future disruptions like the COVID-19 pandemic.

Many competitor countries are well ahead of us in creating cultures and policy frameworks that give individuals agency and the wrap-around support to



navigate and adapt to change through upskilling or retraining throughout their lives.²³

For example, Singapore and Denmark have been implementing national lifelong learning strategies for more than a decade, while in March 2023 the UK Government announced its Lifelong Loan Entitlement (LLE) reform package. From 2025, this will provide a unified system of loan financing and modularised credit articulation for all tertiary education courses, whether academic or technical.

Australia’s vocational and higher education sectors must both be strong if we are to meet future skills needs, enabling students to move easily between the two sectors throughout their lives, and with efficient and transparent processes for credit recognition.

As the Bradley Review highlighted, the core issue to be addressed is the lack of a coherent, federally supported and nationally operating tertiary education regulatory, funding and credit recognition framework, which spans all levels of the AQF and is accessible to Australians throughout their lives.²⁴

A whole-of-government approach will be required to enable complementary reforms to support lifelong learning, including through alignment of personal and business tax incentives, income support, social services and industrial relations laws.²⁵

5. Re-imagine the teaching and student experience to deliver the rapidly evolving knowledge and skills society needs

The rapidly changing geopolitical environment, coupled with even more rapid technological change, requires Australia to boost economic, industrial, research and educational capability to protect and further the national interest.

This will require greater agility and resilience from our tertiary education system. However, students, teachers and employers have indicated that the ability of our institutions to deliver on national goals will be hamstrung without a re-imagining of the teaching and student experience.

We suggest that this re-imagining should deliver key outcomes for skills development, equitable access and lifelong learning, supported by recommendations raised elsewhere in this submission (See ideas 1, 4 and 11). For example, by 2040, tertiary education students in Australia will need personalised learning plans, which are curated to support career and life goals stretching well beyond the acquisition of an initial qualification.

Portfolios of continuous learning will highlight to employers subject matter expertise, foundational and technical skills, and be a clear demonstration of a capability to be a lifelong learner, able to transition quickly as national or business needs change.

Such a portfolio approach to learning is particularly suited to doctoral level education and research training, where a porous boundary between discovery and application is essential.

A re-imagined system would see highly motivated and skilled academic teachers co-create knowledge with students and employers in environments where students share responsibility for their learning.

As stressed above, securing quality work integrated learning opportunities for students is a key challenge

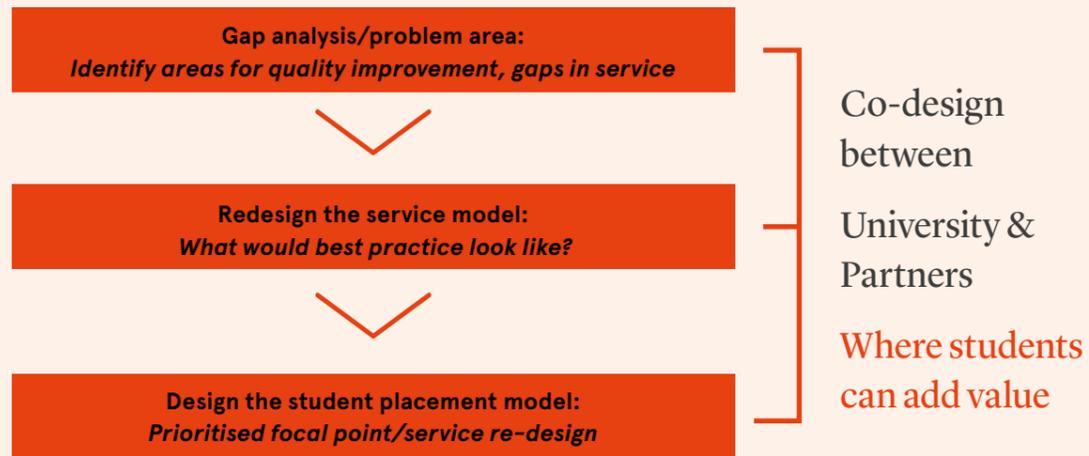
faced by many other tertiary institutions. There are difficulties in all workplaces, but especially in the health system and schools following the pandemic. Within overstretched workplaces, student placements are too-often perceived as an additional burden, rather than a benefit to the workplace and society.

Recent research and initiatives at the University of Sydney suggest there is strong potential to scale up quality WIL opportunities through innovative models co-designed by education providers and employers.

Case Study: The University of Sydney’s Industry and Community Project Units offer undergraduate students from diverse disciplines the opportunity to work in multi-disciplinary teams on real-world projects set by our industry partners. Over 4000 students annually participate in the program with leading business, government and community organisations. The program helps students develop the flexibility and breadth of perspective necessary to work effectively across cultural, disciplinary and professional boundaries.



Work Integrated Learning Partnership Model



Source: Adapted from University of Sydney Faculty of Medicine and Health material. Adapted from: Nisbet G., McAllister, S, Morris, C., Jennings, M (2020). Moving beyond solutionism: re-imagining placements through an activity systems lens. Med Ed.

Figure 6

Case Study: Nisbet et al (see Figure 6) reported on the findings of their research into whether the quality of patient care was enhanced when services were redesigned using a collaborative partnership approach to more purposefully integrate students into the delivery of care. The study provides preliminary evidence that patient care can be improved when a partnering approach is adopted to embed allied health students into services that might not have been delivered in overstretched workplaces.²⁶

In 2015, Universities Australia, the Australian Chamber of Commerce and Industry (ACCI), the Australian Industry Group (AIG), the Business Council of Australia (BCA), and the Australian Collaborative Education Network (ACEN) collaborated to release a joint 'National Strategy on Work Integrated Learning in University Education'. The Accord presents an opportunity to revisit that strategy, and to consider available policy and other options to encourage and incentivise employers to partner more deeply with Australian tertiary education providers to help grow quality WIL opportunities for students.

6. Leverage education and research to build new partnerships to lift capability in the Asia-Pacific

International students are often seen as a mechanism for funding research and, to a lesser extent, teaching in Australia's higher education sector. Country of origin and subject concentrations sometimes contribute to a diminished experience for international and domestic students.

We identify elsewhere in our submission the pressing need for the Commonwealth to commit to a process of reform that would see university research funded differently and more sustainably (see ideas 7-9 in this document). Achieving this single change would open the way for Australian universities to reallocate income from international student fees that is currently used to cross-subsidise research, to directly improve the quality of the learning experience for all students. It would also allow for a more nuanced international strategy and for new models of international education that advance important national strategic objectives such as trade,

meeting skills shortages and, building on the Colombo and New Colombo plans. It would strengthen Australia's relations with countries across our region. Many of our neighbouring countries urgently want to improve school and tertiary education access for their people but have limited capacity. Health-related education and training is one example where Australia could partner with its regional neighbours to build joint capacity and strengthen the resilience of animal and human health systems in the face of the climate crisis, increasing natural disasters, complex and chronic co-morbidities and ageing populations. However, a significant barrier is the absence of reliable, safe and high-quality work-integrated-learning opportunities for international students.

Nursing and teaching are two workforce areas where Australia currently faces severe current and predicted workforce shortages, particularly in regional areas. The Commonwealth can drive change to boost the availability of student placements in both professions for domestic and international students by concurrently leveraging funding and performance requirements under its partnership agreements with the states and territories that cover schools and the public health system.

Evolving technology will increasingly open possibilities to capitalise on the attractiveness of Australia's education sector with new products such as micro-credentials and new patterns of on and offshore study and training at various price points. With stable policy, and diplomatic and funding support from the Commonwealth, many Australian education providers would be keen to invest and partner more deeply with institutions in our region to help our neighbours develop their human capital.

Such flexible educational models would also provide the opportunity to target specific markets that are strong in the foundational skills Australia needs, especially at the postgraduate level. Research needs and collaborations could also be folded in. Examples include the semiconductor industry or the partnerships necessary to support the AUKUS nuclear submarine program. There are many more.

Case Study: The University of Sydney has worked with partners in Vietnam for over two decades.

We bring together researchers and educators in Vietnam and Australia to generate and share new knowledge in diverse disciplines – from urban transport planning and media policy to chronic disease prevention and sustainable agriculture – with the aim of improving the lives of people in Vietnam and beyond.

The Accord presents an opportunity to revisit the importance of international education, research and mutually beneficial international collaborations while strengthening Australia's 'soft power' and public diplomacy across the Asia-Pacific. If the Accord Panel is interested in exploring the potential of these ideas further, we addressed them in detail in our January 2023 submission (pdf, 481.9KB) to the Department of Foreign and Affairs and Trade's consultations to develop the Commonwealth's next Southeast Asia Economic Strategy. We would also be happy to arrange roundtable sessions with our academic experts on Southeast Asia, China and other priority regions.

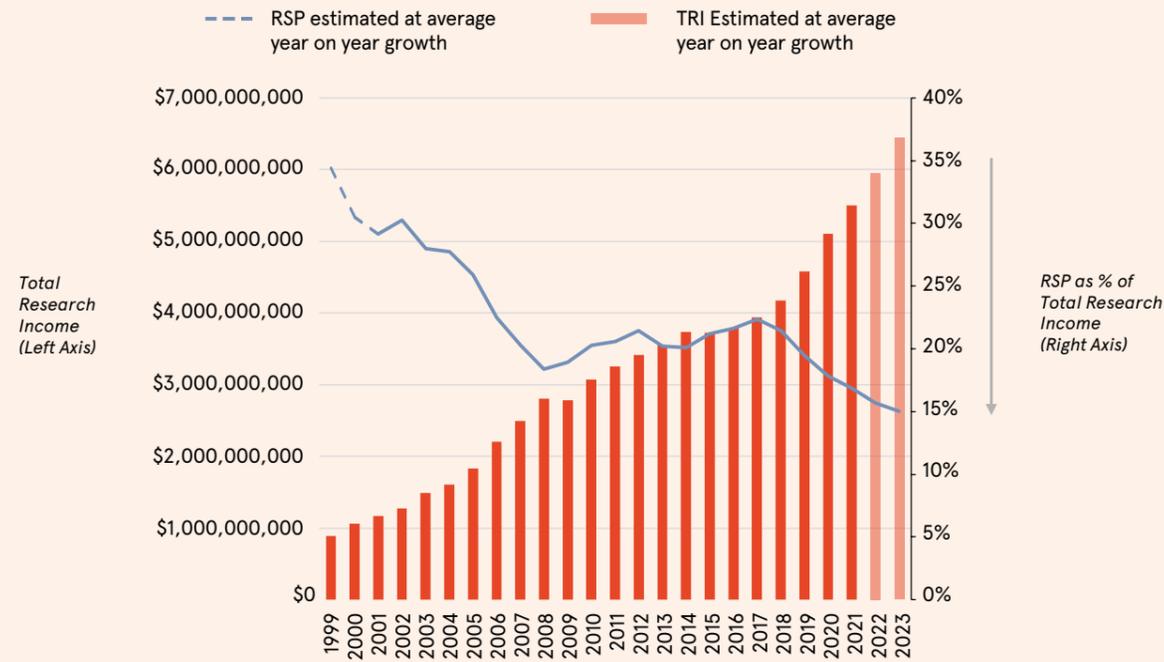
Delivering new knowledge, innovation and capability

7. Ensure Commonwealth funding covers the full economic costs of prioritised research

The Commonwealth, unlike the governments of key competitor countries, does not fund anywhere near the full costs that universities incur delivering research projects commissioned by its research councils and other agencies.²⁷ This puts our universities – and hence the nation – at a competitive disadvantage and has been a key factor driving their pursuit of income from international students.

Additionally, Australia's 'dual' system of competitive grants and research block grants (RBG) continues to assume the existence of the pre-Dawkins' era 'base research' component of funding linked to Commonwealth-supported students. However, through a series of policy

Research Support Program



Source: © A.G.Pettigrew based on data from the Department of Education's Research Block Grant (RBG) Allocations Time Series and Research Income Time Series.
 The equivalent of Research Support Program (RSP) in the years prior to the current RSP formula introduced in 2017 was determined from the following elements of the previous RBG formulae:
 • For the period 2001-2009 = Research Infrastructure Block Grant (RIBG) + Institutional Grant Scheme (IGS)
 • For the period 2010-2016 = RIBG + Sustainable Research Excellence (SRE) + Joint Research Engagement (JRE)
 Used with permission for this report only.

Figure 7

changes culminating in the Job-ready Graduates Package of 2021, this funding for base research capacity has effectively been removed.

The Commonwealth's National Collaborative Research Infrastructure Scheme (NCRIS) still exists to provide vital support for major national research facilities. But funding for substantial new university teaching and research infrastructure no longer exists following the abolition of the Education Investment Fund (EIF) and the Capital Development Pool.

The Commonwealth's support of competitive research infrastructure affects our capability as a nation to deliver world-class research.

During the pandemic, the former Government recognised the scale of the research funding gap facing our universities, and the risks inherent in them relying so heavily on income from international students to support research. It established an expert group to advise on sustainable approaches to research funding, with a \$1 billion one-off boost provided in 2021.²⁸

However, this funding was not continued, and no long-term solution has been implemented. Meanwhile, as Figure 7 shows, the relative value of block funding available to support universities' indirect research continues to decline, with predictions it will reach 15 cents for each dollar of external research income by 2023, down from 34 cents at the turn of the century.

Today, the sovereign research capability based in Australia's universities remains heavily exposed to the risk of future downturns in international student numbers. There is an urgent need for the Commonwealth to ensure the long-term sustainability of Australia's university research funding system by adopting an approach to both funding and regulation based on the leading international models. These models include direct research funding incentives to engage with excellent global research collaborations that are aligned with the national interest.

We encourage the Accord Panel to consider recommending to the Commonwealth that it establish a Sustainable University Research Expert Working group to develop an agreed, evidence-based, economic costing of university research that can be applied across all disciplines.

8. Identify and appropriately fund non-biomedical research priorities

Basic research expands knowledge and underpins the breakthrough technologies, skills development and innovations that support long-term productivity growth and wellbeing at an individual and societal level. Yet the OECD has recently raised concerns about the trend in many countries favouring applied over basic research.²⁹

The Accord Discussion Paper (p.21) asks whether Australian universities should be doing more applied research. However, as Figure 8 shows, the profile of Australian university research has already shifted dramatically from basic to applied over the last 30 years. In 1992, 64 percent of Australian university research expenditure was basic/strategic. By 2020, the profile had completely reversed to 63 percent applied/experimental development.

Australian higher education research expenditure

University expenditure on applied and basic research, from 1992 to 2020



Source: ABS Cat. No. 8111.0 Research and Experimental Development Higher Education Organisations; 'Applied research' includes 'Experimental Development', Basic research includes 'Pure basic research'

Figure 8

Australia must strike the right balance between basic and applied research in its universities, to ensure we continue to make the ground-breaking discoveries critical to growing Australia's pipeline of new IP and technology with practical and commercial applications.

Commonwealth and university expenditure on basic research flows heavily to the medical sciences, with allocations from the Medical Research Future Fund (MRFF) strengthening Australia's capacity in these important fields in recent years. Most non-medical externally-funded basic research conducted in Australia's universities occurs with the support of funding from the Australian Research Council's (ARC) competitive grant programs.

In our vision for a much stronger Australian research and innovation ecosystem by 2040 we see our R&D intensity at 3 percent minimum of GDP and increasing.

We see the regular updating of Australia's science and research priorities guiding future investment and informing the research strategies of individual public research institutions and their researchers.

In this vision, a single Commonwealth research agency is in place, modelled on the UKRI, which combines the functions of the ARC and NHMRC. It has an independent expert board that regularly reviews and advises the Commonwealth on our national research direction and programs, working with the entire research sector. A key focus is improving coordination of the Commonwealth's research investment, including alignment and collaboration between the efforts of the National Public Research Agencies (CSIRO, ANSTO, AIMS, Geoscience Australia, Bureau of Meteorology), universities and state government research bodies.

There will be stronger and more sustained funding for long-term basic research specified in the ARC's Act as a priority, along with amendments to protect the ARC's independence and transparency in ministerial decision-making.

As part of a larger system 'governance and regulatory reform' proposal (see ideas 10-12 in this document) there should be a return to at least a partial institution-based

block system of Commonwealth research funding for public universities to support mission diversification, with research performance managed and rewarded through a quinquennial funding agreement and mission-based compacts processes.

This approach will enable universities to conduct research, while concentrating the necessary resources for world-class deep tech/biotech (e.g., quantum) specialisations to be concentrated as resource-intensive research projects within clusters of universities. Place-based and community-engaged research would continue as an essential component for every Australian university.

9. Incentivise private sector investment in R&D and facilitate porosity between sectors

Countries renowned for their innovation and competitiveness invest much more than Australia in R&D as a share of GDP. As we identified in the *Key challenges and opportunities* section of this submission, their business expenditure on R&D (BERD) generally accounts for a larger share of their total R&D spends than Australia's, and they have higher levels of innovation in their economies.

We share the Productivity Commission's recent concerns that Australia's current approach to university research translation is too narrowly focused on direct commercialisation of IP. We agree that policies to boost firms' human capital, including by supporting the movement of people between organisations, are likely to be more effective.³⁰

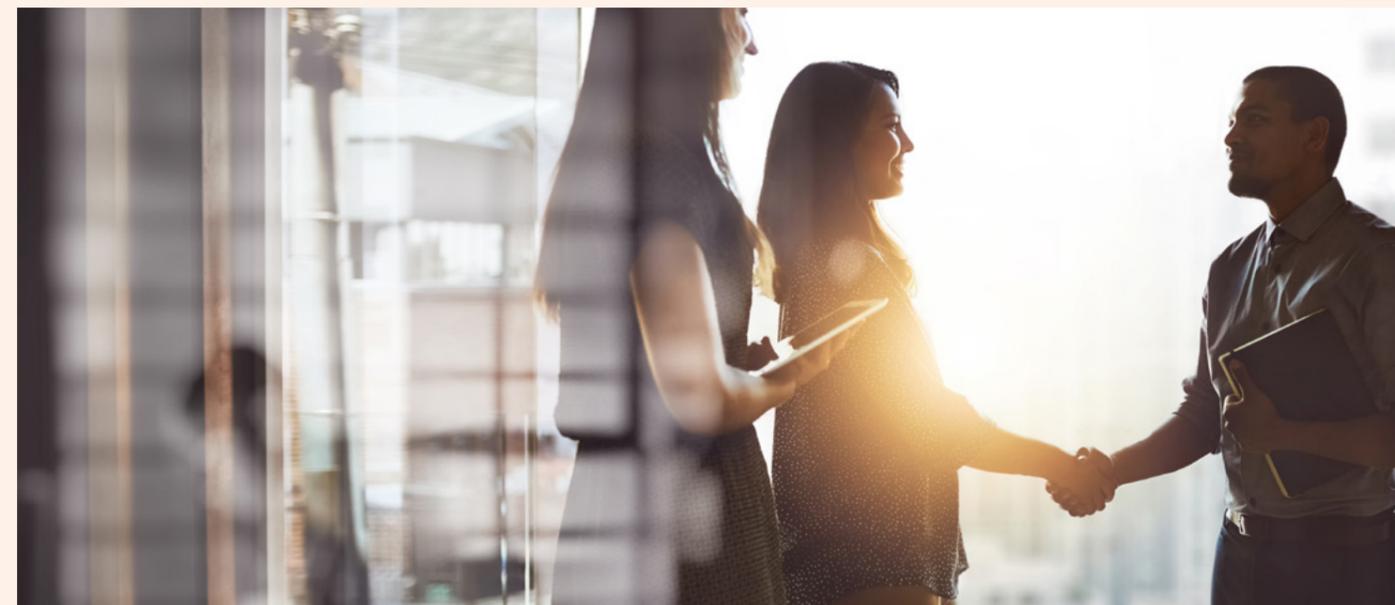
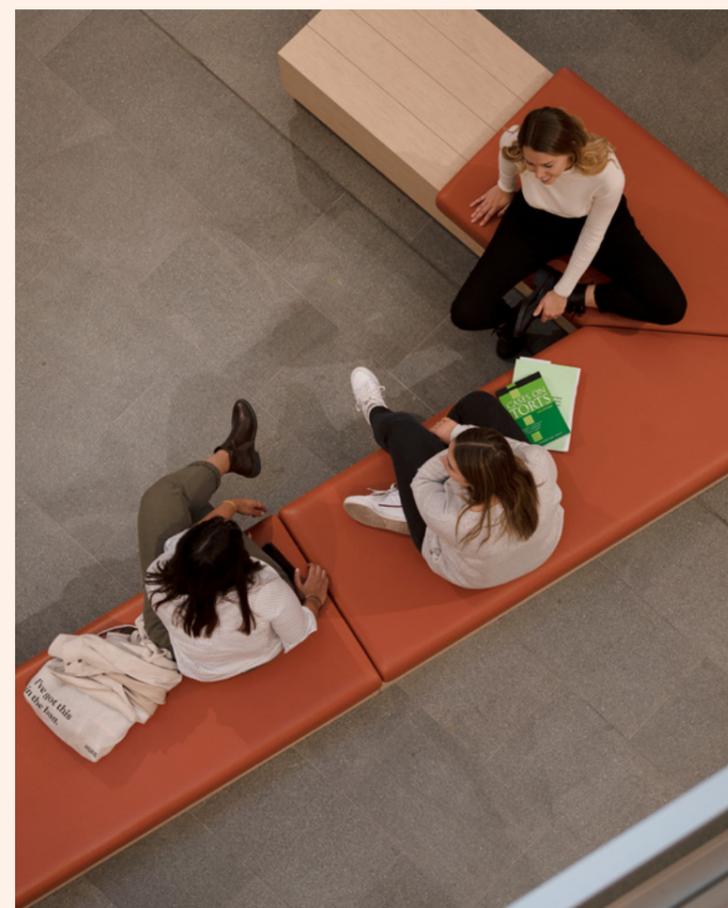
The Government's goal of lifting Australia's R&D intensity from 1.8 to 3 percent of GDP (OECD average 2.67 percent in 2020)³¹ is only likely to be achieved by boosting Australia's business investment in research through a long-term national strategy.

Australia's \$2.5 billion (approx.) annually R&D Tax Incentive program represents 82 percent of total government support for BERD. However, doubts have been raised for many years about the effectiveness of this type of indirect

public research spending compared to direct spending options, in terms of its effect on increasing private sector R&D activity.³²

With Australia's BERD declining from 1.16 percent of GDP in 2006 to 0.92 percent in 2019 serious questions need to be asked about the effectiveness of the R&D Tax Incentive.³³ The scheme was last reviewed in 2016, with sensible recommendations made to help drive additional R&D and to incentivise business/university collaboration.

The Finkel, Ferris and Fraser review provides an excellent starting point for the Accord to revisit these issues.³⁴ Consideration should be given to redirecting funding from the R&D Tax Incentive to expand new direct industry/university collaboration programs that facilitate the movement of people between the sectors. The new Industry PhDs and Fellows are steps in the right direction. [Australia's Economic Accelerator](#) program, and student and staff incubator programs are also helping to foster entrepreneurship and foster collaboration between universities and businesses.



Policy making, governance, regulation, funding and performance

10. Create an independent Australian Tertiary Education Accord Commission to support reform, boost access and reduce red tape

The Bradley Review identified a pressing need for better policy-relevant research analysis and advice about our higher education sector to support strategic decision-making. It recommended that the purpose and role of the [National Centre for Vocational Education Research \(NCVER\)](#)³⁵ should be expanded to cover the whole of the tertiary sector.³⁶

15 years on, the work of the NCVER continues to strengthen Australia's VET policy and practice, but there is still no equivalent body for higher education. The Commonwealth Department of Education is responsible for collecting data about the sector and for policy advice, development and management regarding higher education teaching and research.

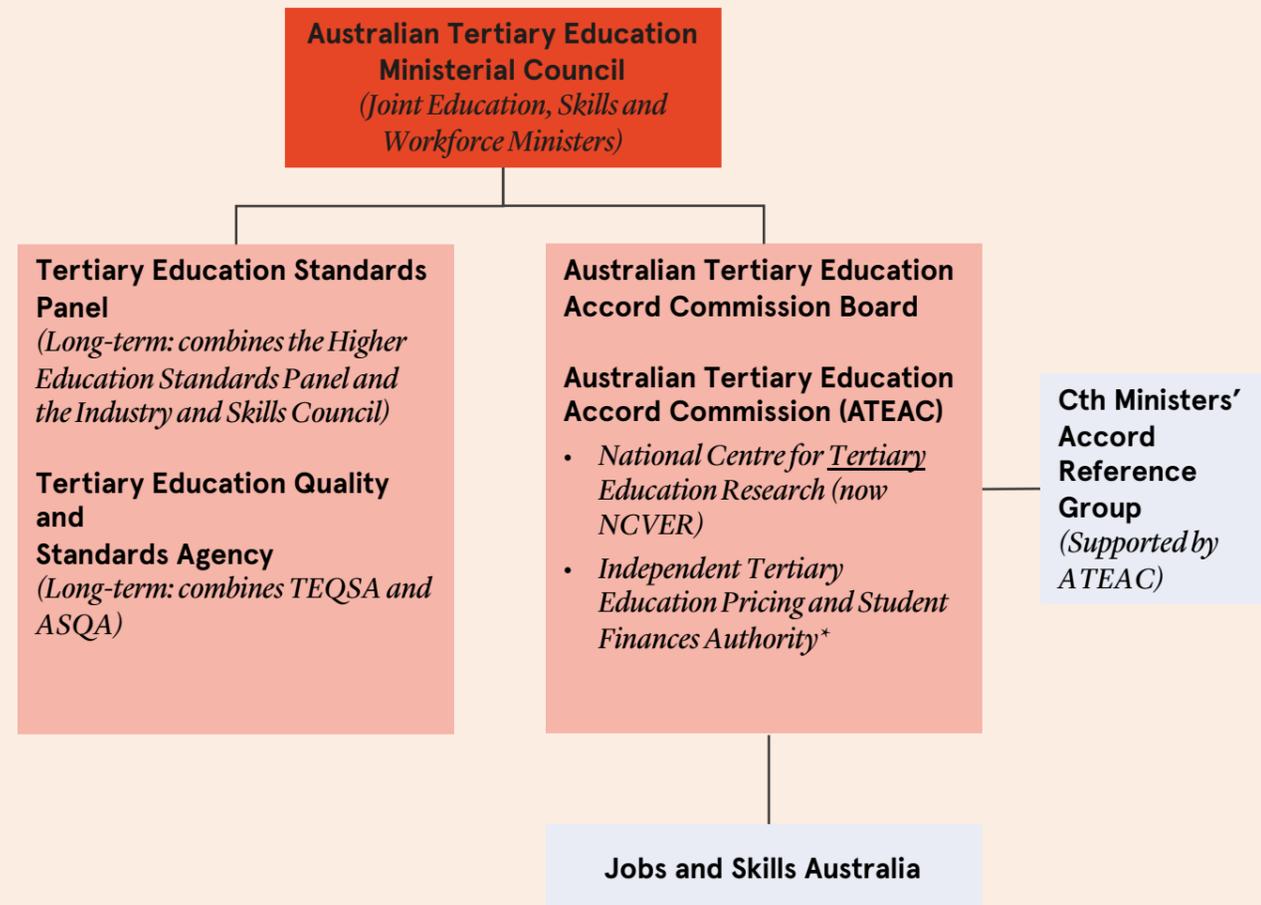
The regulatory, funding and policy framework covering Australia's overlapping VET and higher education sectors is extremely complex, and made more so by its multijurisdictional nature. As **Appendix A** shows, the University of Sydney's legislative compliance register

records 333 legislative instruments and associated documents, of which 142 impose significant compliance burdens. Moreover, as the updated Bradley Review table at **Appendix B** shows, the higher education funding system has become more complex and less transparent since the Bradley review.

This complexity has prevented full implementation of the Bradley Review's vision for a single coherent national tertiary education system under Commonwealth leadership, with a number of negative consequences: students find it increasingly difficult to understand and navigate the system; it has contributed to the VET and higher education sectors' combined failure to meet Australia's current skills needs; and it has dampened innovation by burdening providers with red tape costs estimated in the hundreds of millions of dollars annually.

There are many recent examples of policy and processes relevant to the VET and higher education sectors, or both, which would have benefitted from the presence of an expert advisory body operating independently or at arms-length from government, with clear functions enshrined by legislation. Australia had such a body (Commonwealth Tertiary Education Commission) from 1977 until abolished as part of the Dawkins' reform in 1988, while New Zealand has had a [Tertiary Education Commission](#) since 2004.³⁷

We therefore propose that the Accord Panel recommend that the Commonwealth work with the states and territories to develop a detailed proposal for an "Australian Tertiary Education Accord Commission (ATEAC)" as a key tool for developing and delivering agreed reform of Australia's tertiary education system over the next 20 years.



* Modelled on the Independent Hospital and Aged Care Pricing Authority (IHACPA)

Figure 9

Figure 9 offers an early idea of for an ATEAC operating under the Ministerial Council structures of the National Cabinet. The ATEAC would function as an independent, intermediary agency between governments and all tertiary education providers. It would be the national administrative agency responsible for planning and and resource allocation to the system. It would become the home of the National Centre for Tertiary Education Research, which would expand NCVER’s role to cover higher education and research training.

Once established, the first task of the ATEAC could be to map a path to a fully integrated Australian tertiary education regulatory and funding system by 2040, guided by an enduring process for an Accord. Once in place, the ATEAC would provide the ongoing mechanism for implementing the recommendations of the Accord.

To inform this work, the ATEAC would need to have powers and capability to conduct the robust work required to understand the efficient cost of delivering different qualification types to a required standard of quality in different locations, as well as basic costs of living requirements for students residing in different areas and circumstances. For these reasons we have suggested in our model that the ATEAC would also house an Independent Tertiary Education Pricing Authority, which could be modelled on the Independent Hospital and Aged Care Pricing Authority.

Jobs and Skills Australia would provide ATEAC with advice on current and emerging labour market needs and priorities. Long-term, responsibility for quality assurance standard setting would see the Tertiary Education Quality and Standards Agency (TEQSA) and the Australian Skills Quality Agency (ASQA) combined, and their respective Acts consolidated.

11. Drive provider diversity and specialisation through regulatory and funding reform

Here we provide some ideas about the key issues an Australian Tertiary Education Accord Commission (ATEAC), or similar body, would need to consider if instructed to map a path to integrated Australian tertiary education by 2040.

In the conclusion, we provided some ideas about the steps that could be taken quickly (i.e., for application in Semester 1 2024) to address some of the most problematic aspects of the JRG funding changes, which commenced in 2021.

All the data and trends in tertiary education participation suggest that satisfying future demand from domestic students must be a high priority for the Commonwealth over the next decade at least.³⁸ How is the expected growth in demand for places in Australian universities to be met when they are already extremely large by international standards?³⁹

In relation to universities, we believe the solution lies in revisiting some of the changes to Higher Education Provider Category Standards introduced in 2021, and in understanding and addressing how Commonwealth regulation and funding of universities have driven the sector’s massification, homogenisation in teaching profiles (Appendix C) and growth in international students over the last 30 years.

The 2021 changes to the Provider Category Standards significantly increased the research requirements for registration as an Australian university. Is it desirable to raise the bar for registration under the Australian university category, if the policy objective is to encourage competition, student choice, diversity and specialisation?

As Figure 10 portrays, all Australia universities incur costs sustaining activities across five core areas:

- teaching and learning
- engagement (covering activities like school and community outreach, industry engagement and research commercialisation)
- research and research training
- support infrastructure (hard and soft).





1. Gifts and Income from Endowments (3%), Domestic Student Fees (1%), NSW State Gov Grant (1%), HEC-HELP Student Payment (1%) *Sources available in endnote 47. **Based on 5 year average revenue (2018-2022 actuals, sourced from annual reports, where 2022 actual is preliminary, subject to finalisation of audit)

Figure 10

The funding sources universities have available to them to meet these costs are limited as shown.

To address funding shortfalls in all areas of activity, but especially research, engagement and support infrastructure, most Australian universities have, for the last 20 years or more, pursued strategies to increase their international student enrolments.

The diversion of student fee income to sustain research and other core activities means that this funding has not been available to support the quality of the student learning experience, in the development of affordable student housing, or for the provision of academic, pastoral and financial support for students from low-socioeconomic backgrounds.

As noted above, (Idea 7) the JRG funding changes of 2021 finally settled the question of whether university 'base

funding' (CGS/HECS-HELP) still includes a component for research. As the Productivity Commission has noted recently, this separation is important because it opens the way for this funding to be allocated to providers that do not undertake research.⁴⁰ This shift also highlights the need to consider the adequacy and sustainability of the current funding arrangements for Australian universities, as well as the continuing appropriateness of private-for-profit non-University providers receiving CGS/HECS-HELP funding at rates that are now set with reference to the average estimated delivery costs of public universities only through a costing methodology that has significant limitations.⁴¹

We encourage the Accord Panel to consider these two related ideas – revision of the Higher Education Provider Standards and detailed review of university funding required to sustain core activities – as recommendations to the Commonwealth.

12. Strengthen cooperation between the Commonwealth, states and territories to drive agreed reforms in each jurisdiction

There is immediate potential for much more collaboration between the Commonwealth, state and territory governments, to address immediate skills priorities and agree longer-term shared goals at the national, state and territory levels.

For example, in NSW, the State Government has clearly articulated strategies and priorities for its higher education sector and for the future of its research and innovation system. The NSW Government also has a strong working relationship and well-coordinated communication lines with all NSW public universities, through the New South Wales Vice-Chancellors' Committee (NSWVCC).

State and territory governments are key partners in providing work-integrated learning placements for professionals in diverse workforce areas, but especially in the health professions and teaching. They are also major employers of university graduates and regularly make decisions about infrastructure and other investments to build R&D and innovation capabilities that are relevant to the national research and innovation ecosystem.

From 2023 onwards, NSW's public universities will be required to report annually on their performance against their missions and strategic goals to the NSW Parliament, according to a common framework.⁴² This presents an opportunity for the Commonwealth to work with the NSW Government and its public universities to agree priorities for the system and for individual institutions.

As the Accord Panel looks to reimagine Australia's future tertiary education system, there is much to be gained from looking to the *managed state systems* approaches to operating tertiary education sectors that are strong features of the US and Canadian (similarly federated) systems of government.

Under the Californian state system, for example, the Governor's current funding framework sets a total

of 55 performance expectations covering student access, success, equity, college affordability, inter-system collaboration, workforce alignment and online education, which are applied differently to each institution in the system based on its distinct mission and profile.⁴³ Different institutions receive different levels of block funding depending on their specific mission as part of the system.

In essence, we see immediate benefits, as part of the national reconstruction effort, for Australia's post-school education sector to be operating under a much stronger model of 'cooperative federalism' than exists today.

There would be eight connected, yet distinct, state and territory tertiary education 'systems' operating coherently to deliver outcomes for each jurisdiction agreed between the Commonwealth and state/territory governments, in close consultation with tertiary education providers. State-based public universities would report annually to the parliaments of their state under a consistent framework. Reporting to the Federal Department of Education would cease, with this function assumed by the ATEAC. Resources from the Commonwealth and State Departments of Education would shift to the ATEAC under agreement between the relevant ministers.

Long-term, the operation and performance of each system would be overseen by tertiary education ministers through National Cabinet, with the ATEAC (see idea 10 in this document) working at arms-length to provide the mechanism for operating the national system, and for facilitating strategic dialogue between all stakeholders.



Endnotes

1. CSIRO (July 2022) [Our Future World – Global megatrends impacting the way we live over the coming decade](#); NSW Treasury (2021) [2040 Economic Blueprint](#); Business Council of Australia (2021) [Living on Borrowed Time](#); Sydney Business Insights, The University of Sydney Business School (current undated) [Megatrends for the future of business](#)
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33. OECD (2021) [R&D Tax Incentives: Australia, 2021](#), Directorate for Science, Technology and Innovation, Paris
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42. <https://www.treasury.nsw.gov.au/documents/annual-reporting-reform-2022-discussion-paper>, and the University of Sydney's submission to these consultations
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LEGISLATIVE COMPLIANCE REGISTER AS AT 27 MARCH 2023

Compliance burden is measured by the administrative and other requirements necessary for compliance. High compliance burdens require intensive, continuous work, which is often spread across multiple University organisational units.

Risk is measured by the potential to affect core University functions and operations.

Appendix A
University of Sydney Compliance Register, as at 27 March 2023

Appendix B
Draft updated Bradley Review table mapping eligibility of Australian higher education providers and their students to types of financing

Appendix C
Australian universities' domestic equivalent full-time student load by broad discipline as a percentage of each institution's total domestic student load, 2020

Appendix D
Extract from Productivity Commission (2023) Advancing Prosperity, 5-year Productivity Inquiry: From learning to growth, Inquiry report – volume 8, p.73

Appendix E
Matrix of The University of Sydney's submission mapped to the Australian University Accord Panel's Discussion Paper chapters and consultation questions

LEGISLATIVE INSTRUMENTS AND ASSOCIATED DOCUMENTS
<i>Tier 1: High Compliance Burden, High Risk</i>
Age Discrimination Act 2004 (Cth)
Annual Reports (Statutory Bodies) Act 1984 (NSW)
Annual Reports (Statutory Bodies) Regulation 2015
Anti-Discrimination Act 1977 (NSW)
Australia's Foreign Relations (State and Territory Arrangements) Act 2020 (Cth)
Australia's Foreign Relations (State and Territory Arrangements) Rules 2020
Australian Code for the Responsible Conduct of Research (2018)
Australian Human Rights Commission Act 1986 (Cth)
Autonomous Sanctions Act 2011 (Cth)
Autonomous Sanctions Regulations 2011
Biosecurity (Human Health) Regulation 2016 (Cth)
Biosecurity Act 2015 (Cth)
Biosecurity Act 2015 (NSW)
Biosecurity Regulation 2016 (Cth)
Child Protection (Working with Children) Act 2012 (NSW)
Child Protection (Working with Children) Regulation 2013 (NSW)
Children's Guardian Regulation 2022 (NSW)
Children's Guardian Act 2019 (NSW)
Commonwealth Scholarships Guidelines (Research) 2017
Competition and Consumer Act 2010 (Cth)
Copyright Act 1968 (Cth)
Data Availability and Transparency Act 2022 (Cth)
Data Availability and Transparency Regulations 2022 (Cth)
Defence and Strategic Goods List 2021
Defence Trade Controls Act 2012 (Cth)
Defence Trade Controls Regulation 2013
Disability Discrimination Act 1992 (Cth)
Disability Standards for Education 2005 (Cth)
Education Services for Overseas Students (Registration Charges) Act 1997 (Cth)
Education Services for Overseas Students Act 2000 (Cth)
Education Services of Overseas Students (TPS Levies) Act 2012 (Cth)
ESOS National Code of Practice for Providers of Education and Training to Overseas Students 2018
Ethical conduct in research with Aboriginal and Torres Strait Islander Peoples and Communities: Guidelines for researchers and stakeholders
Fair Work Act 2009 (Cth)
Fair Work Regulations 2009 (Cth)
Foreign Influence Transparency Scheme Act 2018 (Cth)
Government Information (Public Access) Act 2009 (NSW)
Government Information (Public Access) Regulation 2018
Government Sector (Audit) Act 1983 (NSW)
Government Sector Finance Act 2018 (NSW)
Government Sector Finance Amendment (Annual Reporting Requirements) Regulation 2023
Health Records and Information Privacy Act 2002 (NSW)
Higher Education Act 2001 (NSW)
Higher Education Standards Framework (Threshold Standards) 2021 (Cth)
Higher Education Support Act 2003 (Cth)
Independent Commission Against Corruption Act 1988 (NSW)
Modern Slavery Act 2018 (Cth)

LEGISLATIVE INSTRUMENTS AND ASSOCIATED DOCUMENTS

Tier 1: High Compliance Burden, High Risk

Museums of History Act 2022 (NSW)
Museums of History Regulation 2022
National Health Security Act 2007 (Cth)
National Health Security Regulations 2018 (Cth) (Regulations)
National Principles for Child Safe Organisations (National Principles) (Cth)
National Statement on Ethical Conduct in Human Research 2007
Ombudsman Act 1974 (NSW)
Privacy and Personal Information Protection Act 1998 (NSW)
Privacy and Personal Information Protection Regulations (NSW)
Protection of the Environment (Waste) Regulation 2019
Protection of the Environment Operations (General) Regulations 2009
Protection of the Environment Operations (Underground Petroleum Storage Systems) Regulation 2019
Protection of the Environment Operations Act 1997 (NSW)
Public Interest Disclosures Act 1994 (NSW)
Public Interest Disclosures Act 2022 (NSW)
Racial Discrimination Act 1975 (Cth)
Radiation Control Act 1990 (NSW)
Radiation Control Regulation 2013 (NSW)
Security Sensitive Biological Agent (SSBA) Standards 2013 (Cth)
Sex Discrimination Act 1984 (Cth)
State Records Act 1998 (NSW)
Student Identifiers Act 2014 (Cth)
Student Identifiers Regulation 2014 (Cth)
Tertiary Education Quality and Standards Agency (Charges) Act 2021 (Cth)
Tertiary Education Quality and Standards Agency Act 2011 (Cth)
University of Sydney Act 1989 (NSW)
University of Sydney By-law 1999 (NSW)
Weapons of Mass Destruction (Prevention of Proliferation) Act 1995 (Cth)
Weapons of Mass Destruction (Regulations) 2018 (Cth)
Work Health and Safety Act 2011 (NSW)
Work Health and Safety Regulation 2017 (NSW)
Workers Compensation Act 1987 (NSW)
Workplace Gender Equality (Minimum Standards) Instrument 2014 (Cth)
Workplace Gender Equality Act 2012 (Cth)

LEGISLATIVE INSTRUMENTS AND ASSOCIATED DOCUMENTS

Tier 2: High Compliance Burden, Medium Risk

Agricultural and Veterinary Chemical Act 1994 (Cth)
Agricultural and Veterinary Chemicals (New South Wales) Act 1994 (NSW)
Agricultural and Veterinary Chemicals Code Act 1994 (Cth)
Agricultural and Veterinary Chemicals Code Regulation 1995
Anatomy Act 1977 (NSW)
Animal Research Act 1985 (NSW)
Animal Research Regulations
Assisted Reproductive Technology Act 2007 (NSW)
Assisted Reproductive Technology Regulation 2014 (NSW)
Australian Code for the Care and Use of Animals for Scientific Purposes
Biological Control Act 1985 (NSW)
Building Products (Safety) Act 2017 (NSW)
Cheques Act 1986 (Cth)
Civil Aviation Act 1988 (Cth)
Civil Aviation Regulations 1998 (Cth)
Companion Animals Act 1998 (NSW)
Companion Animals Regulations 2018 (NSW)
Environmentally Hazardous Chemicals Act 1985 (NSW)
Environmentally Hazardous Chemicals Regulation 2017 (NSW)

LEGISLATIVE INSTRUMENTS AND ASSOCIATED DOCUMENTS

Tier 2: High Compliance Burden, Medium Risk

Explosives Act 2003 (NSW)
Explosives Regulation 2013 (NSW)
Firearms Act 1996 (NSW)
Firearms Regulation 2017 (NSW)
Gene Technology (Licence Charges) Act 2000 (Cth)
Gene Technology (New South Wales) Act 2003 (NSW)
Gene Technology Act 2000 (Cth)
Gene Technology Regulation 2001 (Cth)
Human Cloning for Reproduction and Other Prohibited Practices Act 2003 (NSW)
Human Tissue Act 1983 (NSW)
Human Tissue Regulation 2020 (NSW)
Independent Contractors Act 2006 (Cth)
Medicines Poisons and Therapeutic Goods Act 2022 (NSW)
Mental Health Act 2007 (NSW)
Mental Health Regulation 2019
Narcotic Drugs (Licence Charges) Act 2016 (Cth)
Narcotic Drugs Act 1967 (Cth)
Narcotic Drugs Regulation 2016 (Cth)
National Greenhouse and Energy Reporting Act 2007 (Cth)
National Greenhouse and Energy Reporting Regulations 2008 (Cth)
Nuclear Non-Proliferation (Safeguards) Act 1987 (Cth)
Nuclear Non-Proliferation (Safeguards) Regulations 1987 (Cth)
Ozone Protection Act 1989 (NSW)
Ozone Protection and Synthetic Greenhouse Gas Management Act 1989 (Cth)
Ozone Protection and Synthetic Greenhouse Gas Management Regulations 1995 (Cth)
Pesticides Act 1999 (NSW)
Pesticides Regulations 2017 (NSW)
Plant Breeder's Rights Act 1994 (Cth)
Poisons and Therapeutic Goods Act 1966 (NSW)
Poisons and Therapeutic Goods Regulation 2008
Prevention of Cruelty to Animals Act 1979 (NSW)
Prevention of Cruelty to Animals Regulation 2012 (NSW)
Prohibition of Human Cloning for Reproduction Act 2002 (Cth)
Radiocommunications Act 1992 (Cth)
Radiocommunications Regulations 1993 (Cth)
Research Involving Human Embryos (New South Wales) Act 2003 (NSW)
Research Involving Human Embryos Act 2002 (Cth)
Research Involving Human Embryos Regulations 2017 (Cth)
Security Industry Act 1997 (NSW)
Security Industry Regulation 2016 (NSW)
Therapeutic Goods Act 1989 (Cth)
Therapeutic Goods Regulation 1990 (Cth)

LEGISLATIVE INSTRUMENTS AND ASSOCIATED DOCUMENTS

Tier 3: Medium Compliance Burden, Medium Risk

A New Tax System (Australian Business Number) Act 1999 (Cth)
A New Tax System (Goods & Services Tax) Act 1999 (Cth)
Aboriginal and Torres Strait Islander Heritage Protection Act 1984 (Cth)
Australian Border Force Act 2015 (Cth)
Australian Charities and Not-for-Profits Commission Act 2012 (Cth)
Australian Charities and Not-for-Profits Commission Regulation 2013 (Cth)
Australian Radiation Protection and Nuclear Safety Act 1998 (Cth)
Australian Radiation Protection and Nuclear Safety Regulations 2018 (Cth)
Building and Construction Industry Security of Payment Act 1999 (NSW)
Business Names Registration Act 2011 (Cth)
Charitable Fundraising Act 1991 (NSW)

LEGISLATIVE INSTRUMENTS AND ASSOCIATED DOCUMENTS
Tier 3: Medium Compliance Burden, Medium Risk

Charitable Fundraising Regulations 2021 (NSW)
Charitable Trusts Act 1993 (NSW)
Charitable Trusts Regulation 2017 (NSW)
Charities Act 2013 (Cth)
Circuit Layouts Act 1989 (Cth)
Circuit Layouts Regulation 1990 (Cth)
Commonwealth Electoral Act 1918 (Cth)
Contaminated Land Management Act 1997 (NSW)
Corporations Act 2001 (Cth)
Customs Act 1901 (Cth)
Defamation Act 2005 (NSW)
Defence Reserve Service (Protection) Act 2001 (Cth)
Designs Act 2003 (Cth)
Designs Regulations 2004 (Cth)
Environment Protection and Biodiversity Conservation Act 1999 (Cth)
Environment Protection and Biodiversity Conservation Regulation 2000 (Cth)
Environmental Protection Act 1994 (Qld)
Fair Trading Act 1987 (NSW)
Food Act 2003 (NSW)
Food Regulation 2015 (NSW)
Fringe Benefits Tax Act 1986 (Cth)
Fringe Benefits Tax Assessment Act 1986 (Cth)
Great Barrier Reef Marine Park Act 1975 (Cth)
Great Barrier Reef Marine Park Regulations 2019 (Cth)
Heritage Act 1977 (NSW)
Heritage Regulation 2012 (NSW)
Income Tax Act 1986 (Cth)
Income Tax Assessment (1936 Act) Regulations (Cth)
Income Tax Assessment (1997 Act) Regulations (Cth)
Income Tax Assessment Act 1936 (Cth)
Income Tax Assessment Act 1997 (Cth)
Income Tax Rates Act 1986 (Cth)
Indigenous Education (Targeted Assistance) Act 2000 (Cth)
Insurance Contracts Act 1984 (Cth)
Insurance Contracts Regulations 2017 (Cth)
Liquor Act 2007 (NSW)
Liquor Regulation 2018 (NSW)
Long Service Leave Act 1955 (NSW)
Long Service Leave Regulation 2021 (NSW)
Marine Parks Act 2004 (Qld)
Marine Parks Regulations 2017 (Qld)
Migration Act 1958 (Cth)
Migration Regulations 1994 (Cth)
National Safety and Quality Health Service (NSQHS) Standards
Paid Parental Leave Act 2010 (Cth)
Patents Act 1990 (Cth)
Patents Regulations 1991 (Cth)
Payroll Tax Act 2007 (NSW)
Personal Property Securities Act 2009 (Cth)
Personal Property Securities Regulations 2010 (Cth)
Protection of Cultural Objects on Loan Act 2013 (Cth)
Protection of Cultural Objects on Loan Regulation 2014 (Cth)
Protection of Movable Cultural Heritage Act 1986 (Cth)
Public Health Act 2010 (NSW)
Public Health Regulation 2012 (NSW)
Retail Leases Act 1994 (NSW)
Road Rules 2014 (NSW)
Road Transport (General) Regulation 2021 (NSW)

LEGISLATIVE INSTRUMENTS AND ASSOCIATED DOCUMENTS
Tier 3: Medium Compliance Burden, Medium Risk

Security of Critical Infrastructure (Application) Rules (LIN 22/026) 2022 (Cth)
Security of Critical Infrastructure Act 2018 (Cth)
Smoke-Free Environment Act 2000 (NSW)
Spam Act 2003 (Cth)
Spam Regulations 2021 (Cth)
Superannuation Act 1916 (NSW)
Superannuation Administration Act 1996 (NSW)
Superannuation Guarantee (Administration) Act 1992 (Cth)
Superannuation Guarantee Charge Act 1992 (Cth)
Superannuation Industry (Supervision) Act 1993 (Cth)
Superannuation Industry (Supervision) Regulations 1994 (Cth)
Surveillance Devices Act 2007 (NSW)
Surveillance Devices Regulation 2022 (NSW)
Taxation Administration Act 1953 (Cth)
Taxation Administration Act 1996 (NSW)
Taxation Administration Regulation 1996 (NSW)
Taxation Administration Regulations 2017 (Cth)
Telecommunications (Interception and Access) Act 1979 (Cth)
Telecommunications (Interception and Access) Regulation 2017 (Cth)
Telecommunications Act 1997 (Cth)
Telecommunications Regulations 2021 (Cth)
Trade Marks Act 1995 (Cth)
Trustee Act 1925 (NSW)
Trustee Regulation 2020 (NSW)
Unclaimed Money Act 1995 (NSW)
Waste Avoidance and Resource Recovery Act 2001 (NSW)
Weapons Prohibition Act 1998 (NSW)
Weapons Prohibition Regulation 2017
Workers' Compensation (Dust Diseases) Act 1942 (NSW)
Workplace Injury Management and Workers Compensation Act 1998 (NSW)
Workplace Surveillance Act 2005 (NSW)
Workplace Surveillance Regulation 2022 (NSW)

LEGISLATIVE INSTRUMENTS AND ASSOCIATED DOCUMENTS
Tier 4: Medium Compliance Burden, Low Risk

Animals Act 1977 (NSW)
Apprenticeship and Traineeship Act 2001 (NSW)
Apprenticeship and Traineeship Regulation 2017 (NSW)
Biodiversity Conservation Act 2016 (NSW)
Biodiversity Conservation Regulation 2017 (NSW)
Chemical Weapons (Prohibition) Act 1994 (Cth)
Chemical Weapons (Prohibition) Regulations 1997 (Cth)
Child Support (Registration and Collection) Act 1988 (Cth)
Child Support (Registration and Collection) Regulations 2018 (Cth)
Conveyancing (Sale of Land) Regulation 2022 (NSW)
Conveyancing Act 1919 (NSW)
Data Sharing (Government Sector) Act 2015 (NSW)
Export Control Act 1982 (Cth)
Export Control Rules 2021 (Cth)
Health Care Complaints Act 1993 (NSW)
Health Care Liability Act 2001 (NSW)
Health Insurance Act 1973 (Cth)
Health Insurance Regulations 2018
Health Practitioner Regulation (Adoption of National Law) Act 2009 (NSW)
Health Practitioner Regulation National Law Act 2009 (NSW)
Healthcare Identifiers Act 2010 (Cth)

Healthcare Identifiers Regulations 2020 (Cth)
Industrial Chemicals Act 2019 (Cth)
National Health Act 1953 (Cth)
Privacy Act 1988 (Cth)
Privacy Regulation 2013 (Cth)
Rural Fires Act 1997 (NSW)
Rural Fires Regulation 2022 (NSW)
Space Activities Act 1998 (Cth)
Space Activities Regulations 2001 (Cth)
State Emergency and Rescue Management Act 1989 (NSW)
Veterinary Practice Act 2003 (NSW)
Veterinary Practice Regulation 2013 (NSW)

Public Works and Procurement Regulation 2019 (NSW)
Residential Tenancies Act 2010 (NSW)
Residential Tenancies Regulations 2019 (NSW)
State Authorities Non-contributory Superannuation Act 1987 (NSW)
State Authorities Non-contributory Superannuation Regulation 2020 (NSW)
State Authorities Superannuation Act 1987 (NSW)
State Authorities Superannuation Regulation 2020 (NSW)
State Debt Recovery Act 2018 (NSW)
State Debt Recovery Regulation 2018 (NSW)
Terrorism (High Risk Offenders) Act 2017 (NSW)
Terrorism (High Risk Offenders) Regulation 2018 (NSW)
Treasury Corporation Act 1983 (NSW)

LEGISLATIVE INSTRUMENTS AND ASSOCIATED DOCUMENTS

Tier 5: Low Compliance Burden, Low Risk

Adoption Act 2000 (NSW)
Adoption Regulation 2015 (NSW)
Building Energy Efficiency Disclosure Act 2010 (Cth)
Building Energy Efficiency Disclosure Regulations 2010 (Cth)
Crime Commission Act 2012 (NSW)
Crimes (Domestic and Personal Violence) Act 2007 (NSW)
Crimes Act 1900 (NSW)
Crimes Act 1914 (Cth)
Criminal Assets Recovery Act 1990 (NSW)
Criminal Assets Recovery Regulation 2017 (NSW)
Criminal Code Act 1995 (Cth)
Criminal Code Regulations 2019 (Cth)
Criminal Records Act 1991 (NSW)
Criminal Records Regulation 2019 (NSW)
Cybercrime Act 2001 (Cth)
Drugs Misuse and Trafficking Act 1985 (NSW)
Drugs Misuse and Trafficking Regulation 2021 (NSW)
Education Standards Authority Act 2013 (NSW)
Education Standards Authority Regulation 2019 (NSW)
Electronic Transactions Act 1999 (Cth)
Electronic Transactions Act 2000 (NSW)
Electronic Transactions Regulation 2017 (NSW)
Electronic Transactions Regulations 2020 (Cth)
Environmental Planning and Assessment Act 1979 (NSW)
Environmental Planning and Assessment Regulation 2000 (NSW)
Fisheries Management (General) Regulation 2019 (NSW)
Fisheries Management Act 1994 (NSW)
Forestry Act 2012 (NSW)
Forestry Regulation 2012 (NSW)
Greater Sydney Commission Act 2015 (NSW)
Greater Sydney Commission Regulation 2016 (NSW)
Legal Profession Uniform Law Application Act 2014 (NSW)
Legal Profession Uniform Law Application Regulation 2015 (NSW)
Library Act 1939 (NSW)
Library Regulation 2018 (NSW)
Local Government (General) Regulation 2021 (NSW)
Local Government Act 1993 (NSW)
Marine Pollution 2014 Regulation (NSW)
Marine Pollution Act 2012 (NSW)
National Consumer Credit Protection Act 2009 (Cth)
National Consumer Credit Protection Regulation 2010 (Cth)
National Redress Scheme for Institutional Child Sexual Abuse (Commonwealth Powers) Act 2018 (NSW)
National Redress Scheme for Institutional Child Sexual Abuse Act 2019 (Cth)
Powers of Attorney Act 2003 (NSW)
Powers of Attorney Regulation 2016 (NSW)

Eligibility of higher education providers and their students to types of financing, March 2023*

Type of Financing	Higher Education Providers					Other accredited higher education institutions (e)
	Table A providers (a)	Table B providers (b)	Table C providers (c)	Other approved higher education providers (d)	Open Universities Australia	
ELIGIBILITY OF PROVIDERS FOR GOVERNMENT FINANCING BY HIGHER EDUCATION PROVIDER TYPE						
COMMONWEALTH GRANT SCHEME						
All grants						
National priority areas only		National priorities only		National priorities only		
OTHER COMMONWEALTH GRANTS UNDER HESA						
Indigenous, Regional and Low Socioeconomic Status Attainment Fund (IRLSAF) grants						
National Priorities and Industry Linkages Fund (NPILF)						
National Institutes	ANU, UTAS/AMC, Batchelor, UniMelb/VCA					
Microcredential Pilot	Round 1	Round 2	Round 2	Round 2	Round 2	Round 2
Superannuation						
Research Support Program						
Research Training Program						
RESEARCH GRANTS						
Australian Research Council Grants						
Trailblazer universities, Australia's Economic Accelerator, Industry PhDs						
NHMRC and MRFF	Any institution that conducts medical research and meets the requirements to be registered as an NHMRC or MRFF Administering Institution					

Type of Financing	Higher Education Providers					Other accredited higher education institutions (e)
	Table A providers (a)	Table B providers (b)	Table C providers (c)	Other approved higher education providers (d)	Open Universities Australia	
ELIGIBILITY OF STUDENTS FOR GOVERNMENT FINANCING BY HIGHER EDUCATION PROVIDER TYPE						
STUDENT LOANS						
HECS-HELP		National priorities only		National priorities only		
FEE-HELP						
SA-HELP						
Student Start-up Loan	Subject to passage of legislation					
OS HELP	Have to be CSPs	Have to be CSPs		Have to be CSPs		
COMMONWEALTH SCHOLARSHIPS						
Undergraduate scholarships						
Postgraduate research scholarships						
STUDENT INCOME SUPPORT						
Youth Allowance, Abstudy and Austudy						No longer eligible
New Colombo Plan						

Light green = provider/student is eligible Light blue = provider/student is not eligible

Note: Includes all eligible providers not just providers currently receiving assistance under a program (a) Public universities and Batchelor Institute of Indigenous Tertiary Education. (b) Bond University, University of Divinity, Torrens University Australia Ltd. (c) Carnegie Mellon University (exiting Australia) (d) As at March 2023 there were 100 approved higher education providers in addition to Table A, B & C providers. Currently (e) Approximately 51 other accredited higher education institutions.

*Note: still draft and subject to change. Updated in March 2023 from Bradley Review Report (p.145) with sincere thanks to Professor Andrew Norton, ANU

Domestic equivalent full-time study load by Broad Discipline

% of total domestic per university, 2020

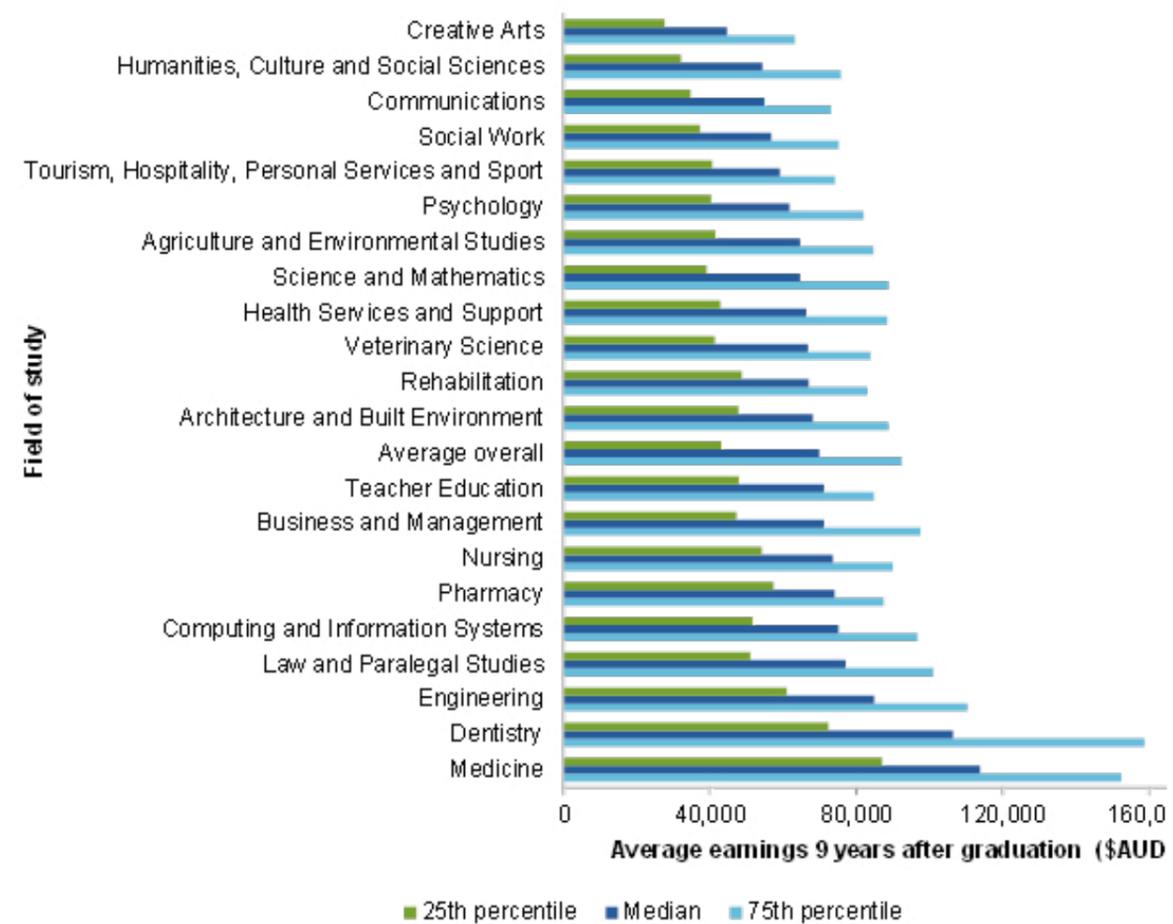
Percent of total EFTSL ■ 0.03-5.00% ■ 5.01-10.00% ■ 10.01-15.00% ■ 15.01-20.00% ■ 20.01-25.00% ■ >25%

Institution	Agriculture Environmental and Related Studies	Architecture and Building	Creative arts	Education	Engineering and Related Technologies	Health	Information Technology	Management and commerce	Natural and Physical Sciences	Society and Culture
The University of Melbourne	3.27%	3.42%	10.36%	6.16%	3.92%	14.94%	3.15%	10.33%	17.18%	27.26%
Monash University	0.73%	1.33%	4.55%	6.06%	6.26%	16.11%	4.45%	10.98%	20.24%	29.29%
University of New South Wales	0.78%	4.46%	7.81%	2.29%	14.31%	8.01%	9.05%	14.36%	19.44%	19.50%
The University of Queensland	3.70%	1.32%	4.10%	3.17%	9.61%	20.52%	2.86%	8.55%	20.28%	25.89%
The University of Sydney	1.13%	2.30%	6.95%	4.69%	7.33%	23.60%	3.47%	8.76%	14.97%	26.81%
The Australian National University	2.85%		4.09%	0.05%	3.99%	5.13%	5.00%	5.69%	17.86%	55.35%
The University of Adelaide	2.75%	1.31%	6.45%	2.26%	8.81%	19.93%	4.24%	8.98%	17.74%	27.53%
The University of Western Australia	1.50%	2.22%	4.70%	2.55%	7.23%	14.33%	3.46%	12.62%	22.61%	28.77%
The University of Newcastle	1.52%	5.23%	6.45%	12.30%	6.46%	22.71%	1.71%	6.65%	16.37%	21.54%
Curtin University	0.67%	4.92%	10.21%	12.16%	7.11%	20.76%	3.50%	12.72%	13.24%	14.70%
Queensland University of Technology	0.51%	4.55%	9.91%	8.12%	7.44%	14.00%	7.43%	15.30%	10.60%	22.15%
Macquarie University	0.99%	0.16%	5.06%	6.72%	2.06%	4.88%	6.31%	20.27%	12.86%	40.69%
University of Tasmania	3.88%	1.53%	8.82%	10.02%	3.31%	33.22%	1.72%	4.21%	13.07%	20.22%
University of Technology Sydney	0.53%	4.17%	11.01%	2.16%	14.02%	10.72%	7.03%	19.87%	15.64%	14.85%
Griffith University	0.87%	1.20%	10.73%	8.02%	3.62%	15.50%	2.68%	14.09%	13.58%	29.70%
RMIT University	1.00%	6.83%	14.22%	2.37%	13.43%	6.83%	8.38%	18.27%	10.86%	17.79%
Deakin University	1.41%	2.10%	5.77%	8.49%	2.22%	17.34%	5.02%	12.53%	12.41%	32.70%
University of Wollongong	0.57%		7.93%	10.37%	6.40%	14.57%	4.32%	11.66%	15.84%	28.33%
La Trobe University	2.94%	0.12%	2.50%	8.97%	1.19%	35.29%	3.49%	8.88%	13.67%	22.93%
University of South Australia	0.33%	4.76%	9.77%	11.06%	4.32%	21.22%	5.13%	14.04%	10.92%	18.46%
Flinders University	0.31%		6.56%	8.62%	3.81%	32.38%	2.36%	4.85%	15.27%	25.85%
Swinburne University of Technology		1.14%	16.70%	17.95%	10.13%	3.91%	7.81%	14.84%	7.16%	20.36%
Western Sydney University	0.75%	2.53%	5.23%	5.81%	7.78%	20.02%	3.02%	10.88%	13.32%	30.66%
James Cook University	0.79%	0.33%	1.90%	6.94%	3.33%	43.71%	3.71%	6.30%	17.19%	15.81%
Charles Darwin University	0.51%	0.69%	6.96%	13.77%	2.34%	34.64%	3.52%	2.84%	12.71%	22.02%
The University of New England	3.54%	0.81%	3.79%	17.82%	0.24%	8.04%	1.96%	7.22%	15.86%	40.71%
Murdoch University	2.44%	0.12%	4.58%	10.27%	1.80%	15.66%	4.40%	4.75%	19.09%	36.89%
University of Southern Queensland	0.70%	0.34%	7.00%	18.92%	10.63%	17.89%	4.01%	8.60%	12.49%	19.43%
University of the Sunshine Coast	2.68%	0.35%	12.80%	10.22%	2.05%	24.43%	2.80%	7.26%	17.52%	19.90%
Edith Cowan University	0.50%	0.02%	8.72%	30.09%	2.44%	23.10%	5.80%	6.92%	7.15%	15.25%
Victoria University	1.04%	2.69%	1.98%	13.72%	3.44%	23.75%	1.93%	7.62%	11.05%	32.79%
University of Canberra	0.80%	4.46%	12.62%	10.74%	1.44%	17.28%	6.39%	10.90%	14.31%	21.07%
CQUniversity	0.99%	1.16%	5.26%	12.13%	5.47%	33.77%	2.79%	9.16%	14.80%	14.47%
Charles Sturt University	4.79%	0.05%	2.82%	15.04%	0.48%	21.51%	3.23%	5.63%	10.40%	36.04%
Southern Cross University	2.21%	0.07%	7.50%	13.68%	1.40%	21.74%	1.35%	11.58%	17.78%	22.70%
Australian Catholic University	0.03%		1.95%	23.74%	0.26%	39.85%	0.67%	4.39%	7.01%	22.09%
Federation University Australia	1.16%		4.47%	18.51%	2.65%	32.17%	3.72%	7.36%	11.59%	18.36%
Bond University	0.22%	3.49%	2.93%	0.94%	0.19%	45.40%	1.56%	12.12%	5.72%	27.44%
The University of Notre Dame Australia	0.35%	0.17%	3.30%	21.27%		33.86%		5.91%	6.99%	28.14%
University of Divinity										100.00%
Torrens University Australia		4.08%	30.57%	2.47%		28.37%	1.23%	29.19%	0.56%	3.53%
Batchelor Institute of Indigenous Tertiary Education										100.00%
Total	1.4%	2.2%	7.4%	9.1%	5.8%	19.2%	4.3%	11.1%	14.1%	25.4%

Source: Universities ranked by RBG in 2022; © A.G.Pettigrew and used with permission for this report only

Matrix of The University of Sydney's submission mapped to the Australian University Accord Panel's Discussion Paper chapters and consultation questions

Figure 3.4 – The private benefits of education vary by field of study ^a
Average earnings 9 years after university graduation, for those graduating in 2008



a. This provides only a weak proxy for earnings benefits, as it is difficult to attribute the earnings differentials directly to education. This chart contains data for those who graduated in 2008, and reflects their average income 9 years after graduation, in 2017/18.

Source: SRC (Social Research Centre) 2021, *Graduate incomes data*, QILT, <https://www.qilt.edu.au/general/article/2021-11/04/graduate-incomes-data> (accessed 26 August 2022).

Source: Productivity Commission 2023, *5-year Productivity Inquiry: From learning to growth, Vol. 8, Inquiry Report no. 100, Canberra, p.73*

Available via: <https://www.pc.gov.au/inquiries/completed/productivity/report/productivity-volume8-education-skills.pdf>

	University of Sydney submission sections												
	Vice-Chancellor's message	Access and opportunity			Education and skills for the future			Delivering new knowledge, innovation and capability		Policy making, governance, regulation, funding and performance			
Executive Summary													
A vision for the future of Australian tertiary education													
The need for change													
Accord Discussion Paper chapters and consultation questions		1.	2.	3.	4.	5.	6.	7.	8.	9.	10.	11.	12.
Chapter 1. Introduction: the role of higher Education in Australia's Future													
1.1 Purpose of the review													
1.2 Consultation and engagement													
1.3 The nature and purpose of Australian higher education													
Q.1 How should an Accord be structured and focused to meet the challenges facing Australia's higher education system? What is needed to overcome limitations in the current approach to Australian higher education?	X										X	X	X
Q.2 How can the diverse missions of Australian higher education providers be supported, taking into account their		X	X		X				X			X	

Matrix of The University of Sydney's submission mapped to the Australian University Accord Panel's Discussion Paper chapters and consultation questions

	University of Sydney submission sections												
	Vice-Chancellor's message	Access and opportunity			Education and skills for the future			Delivering new knowledge, innovation and capability		Policy making, governance, regulation, funding and performance			
Executive Summary													
A vision for the future of Australian tertiary education													
The need for change													
Accord Discussion Paper chapters and consultation questions		1.	2.	3.	4.	5.	6.	7.	8.	9.	10.	11.	12.
different operating contexts and communities they serve (for example regional universities)?													
Q.3 What should the long-term target/s be for Australia's higher education attainment by 2030 and 2040, and how should these be set and adjusted over time?	X		X		X		X	X		X	X		X
Chapter 2. Challenges and Opportunities for Australia													

Matrix of The University of Sydney's submission mapped to the Australian University Accord Panel's Discussion Paper chapters and consultation questions

	University of Sydney submission sections												
	Vice-Chancellor's message Executive Summary A vision for the future of Australian tertiary education The need for change	Access and opportunity			Education and skills for the future			Delivering new knowledge, innovation and capability			Policy making, governance, regulation, funding and performance		
Accord Discussion Paper chapters and consultation questions		1.	2.	3.	4.	5.	6.	7.	8.	9.	10.	11.	12.
Q.11 How should Australia boost demand from people to study in the higher education system?		X	X	X	X	X	X				X		
Q.12 How should an adequate supply of CSPs be sustained and funded, as population and demand increase?	X						X				X	X	X
3.2.4 Collaboration with industry													

Matrix of The University of Sydney's submission mapped to the Australian University Accord Panel's Discussion Paper chapters and consultation questions

	University of Sydney submission sections												
	Vice-Chancellor's message Executive Summary A vision for the future of Australian tertiary education The need for change	Access and opportunity			Education and skills for the future			Delivering new knowledge, innovation and capability			Policy making, governance, regulation, funding and performance		
Accord Discussion Paper chapters and consultation questions		1.	2.	3.	4.	5.	6.	7.	8.	9.	10.	11.	12.
Q.13 How could an Accord support cooperation between providers, accreditation bodies, government and industry to ensure graduates have relevant skills for the workforce?					X	X	X				X	X	X
Q.14 How should placement arrangements and work-integrated learning (WIL) in higher education change in the decades ahead?		X			X	X	X						X
3.2.5 Lifelong Learning													
Q.15 What changes are needed to grow a culture of lifelong learning in Australia?		X	X	X	X						X		

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	Vice-Chancellor's message Executive Summary A vision for the future of Australian tertiary education The need for change	Access and opportunity			Education and skills for the future			Delivering new knowledge, innovation and capability			Policy making, governance, regulation, funding and performance		
Accord Discussion Paper chapters and consultation questions		1.	2.	3.	4.	5.	6.	7.	8.	9.	10.	11.	12.
Q.16 What practical barriers are inhibiting lifelong learning, and how can they be fixed?	X	X	X	X	X								
3.3 Connection between the vocational education and training and higher education systems 3.3.1 Strengthened tertiary system													
Q.17 How should better alignment and connection across Australia's tertiary education system be achieved?			X		X						X	X	X

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	University of Sydney submission sections												
	Vice-Chancellor's message Executive Summary A vision for the future of Australian tertiary education The need for change	Access and opportunity			Education and skills for the future			Delivering new knowledge, innovation and capability			Policy making, governance, regulation, funding and performance		
Accord Discussion Paper chapters and consultation questions		1.	2.	3.	4.	5.	6.	7.	8.	9.	10.	11.	12.
Q.18 What role should reform of the AQF play in creating this alignment?					X						X		X
Q.19 What would a more effective and collaborative national governance approach to tertiary education look like?	X										X	X	X
3.3.2 Pathways for students													
Q.20 How can pathways between VET and higher education be improved, and how can students be helped to navigate these pathways?			X		X	X	X				X		

Matrix of The University of Sydney's submission mapped to the Australian University Accord Panel's Discussion Paper chapters and consultation questions

	University of Sydney submission sections												
	Vice-Chancellor's message	Access and opportunity			Education and skills for the future			Delivering new knowledge, innovation and capability			Policy making, governance, regulation, funding and performance		
Accord Discussion Paper chapters and consultation questions		1.	2.	3.	4.	5.	6.	7.	8.	9.	10.	11.	12.
Q.21 How can current examples of successful linkages between VET and higher education be integrated across the tertiary education system?	Executive Summary A vision for the future of Australian tertiary education The need for change		X		X						X		
Q.22 What role do tertiary entrance and admissions systems play in matching learners to pathways and supporting a sustained increase in participation and tertiary success?			X		X						X		
3.4 A system that delivers new knowledge, innovation and capability 3.4.1 Collaborating to a purpose – solving big challenges													

Matrix of The University of Sydney's submission mapped to the Australian University Accord Panel's Discussion Paper chapters and consultation questions

	University of Sydney submission sections												
	Vice-Chancellor's message	Access and opportunity			Education and skills for the future			Delivering new knowledge, innovation and capability			Policy making, governance, regulation, funding and performance		
Accord Discussion Paper chapters and consultation questions		1.	2.	3.	4.	5.	6.	7.	8.	9.	10.	11.	12.
Q.23 How should an Accord help Australia increase collaboration between industry, government and universities to solve big challenges?				X	X	X	X	X	X	X	X		X
Q.24 What reforms will enable Australian research institutions to achieve excellence, scale and impact in particular fields?	X							X	X	X		X	X
3.4.2 Investment in types of research 3.4.3 Research strengths – the need to be responsive 3.4.4 Relationship to ARC Review													

Matrix of The University of Sydney's submission mapped to the Australian University Accord Panel's Discussion Paper chapters and consultation questions

	University of Sydney submission sections												
	Vice-Chancellor's message	Access and opportunity			Education and skills for the future			Delivering new knowledge, innovation and capability			Policy making, governance, regulation, funding and performance		
Accord Discussion Paper chapters and consultation questions		1.	2.	3.	4.	5.	6.	7.	8.	9.	10.	11.	12.
Q.25 How should Australia leverage its research capacity overall and use it more effectively to develop new capabilities and solve wicked problems?	Executive Summary A vision for the future of Australian tertiary education The need for change	X					X	X	X	X	X	X	
Q.26 How can Australia stimulate greater industry investment in research and more effective collaboration?		X								X			X
3.4.5 Research workforce													
Q.27 How can we improve research training in Australia including improving pathways for researchers to gain		X					X	X	X	X	X		

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	University of Sydney submission sections												
	Vice-Chancellor's message	Access and opportunity			Education and skills for the future			Delivering new knowledge, innovation and capability			Policy making, governance, regulation, funding and performance		
Accord Discussion Paper chapters and consultation questions		1.	2.	3.	4.	5.	6.	7.	8.	9.	10.	11.	12.
experience and develop high-impact careers in government and industry?													
3.5 Creating opportunity for all Australians 3.5.1 Academic preparedness													
Q.28 What is needed to increase the number of people from under-represented groups applying to and prepared for higher education, both from school and from other pathways?	X	X	X	X		X					X		
Q.29 What changes in provider practices and offerings are necessary to ensure all potential students can succeed in their chosen area of study?			X	X	X	X		X			X		

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	Vice-Chancellor's message Executive Summary A vision for the future of Australian tertiary education The need for change	Access and opportunity			Education and skills for the future			Delivering new knowledge, innovation and capability			Policy making, governance, regulation, funding and performance		
Accord Discussion Paper chapters and consultation questions		1.	2.	3.	4.	5.	6.	7.	8.	9.	10.	11.	12.
Q.39 What reforms are needed to ensure that all students have a quality student experience?	X	X	X		X	X	X					X	X
Q.40 What changes are needed to ensure all students are physically and culturally safe while studying?		X					X						
3.7.2 Research quality													
Q.41 How should research quality be prioritised and supported most effectively over the next decade?								X	X	X	X		X
3.7.3 Academic integrity													

Matrix of The University of Sydney's submission mapped to the Australian University Accord Panel's Discussion Paper chapters and consultation questions

	University of Sydney submission sections												
	Vice-Chancellor's message Executive Summary A vision for the future of Australian tertiary education The need for change	Access and opportunity			Education and skills for the future			Delivering new knowledge, innovation and capability			Policy making, governance, regulation, funding and performance		
Accord Discussion Paper chapters and consultation questions		1.	2.	3.	4.	5.	6.	7.	8.	9.	10.	11.	12.
Q.42 What settings are needed to ensure academic integrity, and how can new technologies and innovative assessment practices be leveraged to improve academic integrity?								X	X	X	X		
3.8 The role of international education													
Q.43 How should the current recovery in international education be managed to increase the resilience and sustainability of Australia's higher education system, including through diversification of						X	X				X		

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	University of Sydney submission sections												
	Vice-Chancellor's message Executive Summary A vision for the future of Australian tertiary education The need for change	Access and opportunity			Education and skills for the future			Delivering new knowledge, innovation and capability			Policy making, governance, regulation, funding and performance		
Accord Discussion Paper chapters and consultation questions		1.	2.	3.	4.	5.	6.	7.	8.	9.	10.	11.	12.
student enrolments from source countries?													
Q.44 How can the benefits of international education be shared broadly across the system, including in regional areas, and what level of reporting should there be?			X				X				X		
3.9 Investment and affordability													
Q.45 How should the contribution of different institutions and providers to key national objectives specific to their location, specialist expertise or											X		X

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	University of Sydney submission sections												
	Vice-Chancellor's message Executive Summary A vision for the future of Australian tertiary education The need for change	Access and opportunity			Education and skills for the future			Delivering new knowledge, innovation and capability			Policy making, governance, regulation, funding and performance		
Accord Discussion Paper chapters and consultation questions		1.	2.	3.	4.	5.	6.	7.	8.	9.	10.	11.	12.
community focus be appropriately financed?													
Q.46 How can infrastructure development for higher education be financed, especially in regional and outer urban locations?	X							X				X	X
3.9.1 Commonwealth funding for higher education research and teaching and learning													
Q.47 What structure of Commonwealth funding is needed for the higher	X										X	X	X

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	University of Sydney submission sections												
	Vice-Chancellor's message Executive Summary A vision for the future of Australian tertiary education The need for change	Access and opportunity			Education and skills for the future			Delivering new knowledge, innovation and capability			Policy making, governance, regulation, funding and performance		
Accord Discussion Paper chapters and consultation questions		1.	2.	3.	4.	5.	6.	7.	8.	9.	10.	11.	12.
education sector for the system to be sustainable over the next two decades?													
3.9.2 Student contributions and the Higher Education Loan Program													
Q.48 What principles should underpin the setting of student contributions and Higher Education Loan Program arrangements?	X												
3.9.3 Job-ready Graduates (JRG) package													

Matrix of The University of Sydney's submission mapped to the Australian University Accord Panel's Discussion Paper chapters and consultation questions

	University of Sydney submission sections												
	Vice-Chancellor's message Executive Summary A vision for the future of Australian tertiary education The need for change	Access and opportunity			Education and skills for the future			Delivering new knowledge, innovation and capability			Policy making, governance, regulation, funding and performance		
Accord Discussion Paper chapters and consultation questions		1.	2.	3.	4.	5.	6.	7.	8.	9.	10.	11.	12.
Q.49 Which aspects of the JRG package should be altered, and which should be retained?	X							X					