



Feedback to the Honorable Dan Tehan MP, Minister for Education and Training about improving equity and participation in Australia's universities.

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From the Equity Practitioners in Higher Education Australasia (EPHEA) info@ephea.org

The Equity Practitioners in Higher Education Australasia (EPHEA) Association recently provided the information below to the Opposition Minister for Education, Tanya Plibersek in response to Labor's recent announcements committing to boost equity and participation in Australia's Universities. EPHEA believes that a bipartisan approach to equity in higher education is a productive and necessary way forward to improve the policy settings conducive to participation by equity groups in this sector. We are forwarding information on behalf of our members which we believe can transform the education system into one which is truly equitable and accessible for all.

We liaise regularly with your staff within the Department of Education and Training's Governance, Quality and Access Branch who are generous with their time and we welcome the opportunity to meet with you to discuss this in more detail.

About EPHEA

EPHEA is the national body of equity practitioners in the higher education sector. One of EPHEA's key goals is to ensure the continued essential work being undertaken by our members to support access and participation of under-represented groups into higher education. Our membership includes equity practitioners from all of Australia's public universities supporting Aboriginal and Torres Strait Islander peoples; people from low socioeconomic status backgrounds (LSES); people from regional and remote areas; people with disabilities; people from culturally and linguistically diverse backgrounds; and women in non-traditional areas. We also have representation from six universities in New Zealand and have collaborations with the National Centre for Student Equity in Higher Education (NCSEHE); The Council for Postgraduate Associations; and the National Association of Enabling Educators Australia.

EPHEA applauds policy and funding which truly supports fair access for disadvantaged students to higher education, we strongly believe that careful positioning of both existing and any additional funding must be done in consultation with stakeholders such as EPHEA. Any new or existing funding should align with the existing equity programs so as not to 'reinvent the wheel'. In addition, dedicated equity funding can only go so far in addressing structural barriers to the participation of under-represented groups and we believe the Government can do more to facilitate this.

Sadly, the Government has instituted some detrimental policy changes made over the past 5 years which work against access and participation. Some of these changes are particularly problematic for students who experience multiple disadvantage which compounds over time from early schooling through to post-school

education and access to employment and is influenced by other factors such as poverty, race, access to technology and education, and mental health and disability (Lamb et al, 2015¹; Vinson & Rawthorne, 2015²).

We value a Government that has a real desire to hear from key stakeholders about how Australian Higher Education can progress and equity agenda in the future. Our **key concerns and recommendations** are for effective tailoring of the new funding in the context of existing programs, and addressing detrimental policy changes that have been made.

We have listed 10 key areas of concern with relevant research and examples for your consideration.

1. [Adequate support for the Higher Education Partnerships and Participation Program \(HEPPP\) as a fundamental and sustainable strategy to support LSES access and participation is needed](#)
2. [The lack of an integrated approach to tertiary education access and participation needs to focus on better transition between school, TAFE/VET and university](#)
3. [More targeted support for students from regional and remote areas is needed](#)
4. [Flawed policy and funding settings through the Indigenous Student Success Program \(ISSP\) to support Aboriginal and Torres Strait Islander students needs to be addressed](#)
5. [There is insufficient support through the Disability Support Program \(DSP\) to support students with disabilities within higher education](#)
6. [Abolishing free enabling programs as tried and tested pathways for equity group students is a threat to equitable access and participation in tertiary education](#)
7. [Detrimental changes to Commonwealth Scholarships directly supporting low-income students requires urgent review](#)
8. [Reduction in the income threshold for HECS-HELP is a deterrent to low-income students' access to higher education](#)
9. [Limitations to HECS-HELP for some domestic students, in particular, NZ citizens who have, and will, contribute to the Australian economy needs to be reviewed](#)
10. [Cuts to higher education of over \\$2.1 billion dollars needs to be reversed](#)

1. Adequate support for the Higher Education Partnerships and Participation Program (HEPPP) as a fundamental and sustainable strategy to support LSES access and participation is needed

The Higher Education Partnerships and Participation Program (HEPPP), which was introduced following the Bradley Review, represents an effective national tool for building aspiration and increasing access, participation and success for students who are under-represented in higher education. We applaud the Government for its continued commitment to the HEPPP which funds a range of specialised programs, informed by research and shared best practice³, and which is specifically designed to support the student journey from school through to bachelor completion.

However, the original intention of the program introduced in 2009 has lost some of its efficacy due to some structural changes to program design, lack of transparency in program expenditure, poor monitoring of outcomes and limited evaluations of program impact. We first explore the issues related to a reduction in

¹ Lamb, S, Jackson, J, Walstab, A & Huo, S (2015). [Educational opportunity in Australia 2015: Who succeeds and who misses out](#). Centre for International Research on Education Systems, Victoria University, for the Mitchell Institute, Melbourne: Mitchell Institute.

² Vinson, T. & Rawthorne, M. (2015). [Dropping off the edge](#). Jesuit Social Services / Catholic Social Services Australia.

³ Bennett, A., Naylor, R., Mellor, K., Brett, M., Gore, J., Harvey, A., Munn, B., James, R., Smith, M., and Whitty, G. (2015). The Critical Interventions Framework Part 2: Equity Initiatives in Australian Higher Education: A Review of Evidence of Impact'.

emphasis of the partnership component of HEPPP, and dedicated funding associated with it, before we turn to broader issues with the HEPPP Guidelines and their enforcement.

The underlying feature of the HEPPP was to ensure ALL universities are working to widen participation and supporting retention of LSES students. However, the Government attempted to remove the 'partnership' aspect of HEPPP in its recent reform package potentially reducing incentives for universities to focus on outreach.

This reform package was defeated and so EPHEA recommends the Government retain and fund a partnership component which requires that each university should be spending a minimum on outreach strategies to build aspiration and widen participation. If there is no mandated minimum, some universities will spend zero HEPPP funding on outreach. For universities working with prospective students in regional and remote areas there should be additional funds to support projects with higher costs of provision.

Collaboration in outreach as essential and needs to be explicitly incentivised

Despite the fact that both the ACIL Allen report and the reform package recommended collaboration there are currently no explicit incentives to do this. The partnership component of the HEPPP is no longer funded separately but rolled into the allocation formula and the competitive partnership grant scheme has been absorbed into the National Priorities Pool (NPP). We believe the Government can rectify this by including incentives to support collaboration.

The NPP has provided opportunities for collaboration nationally on projects that have been of great significance to the sector and in contributing to equity in higher education. These projects have seen collaborations between universities (including Consortia) and fostered projects between researchers and practitioners which have contributed to innovations in the equity space. However, since 2016 opportunities to develop innovative and relevant projects has been limited by very specific topics determined by the Department of Education.

The NPP should provide expanded and dedicated funding that will 'encourage outreach collaboration between universities'. The NPP should not be treated as another source of research funding but used to incentivise innovative and collaborative practice.

The ACIL Allen report explicitly recommends that universities should be working together to eliminate gaps and duplication in provision, by coordinating where each will do their outreach work ('defined geographical regions') and what each will do. The report outlines issues where some places have been over-served and some under-served. Consortia in three states (NSW, QLD and VIC) tackled this issues in the early days of HEPPP using dedicated 'partnership' grants generating positive outcomes.

- The [Queensland Widening Participation Consortium](#) established with all of Queensland's public universities, won a \$21 million grant to improve the participation of LSES and Indigenous people in tertiary education.
- The [NSW Consortium 'Bridges to Higher Education'](#), established by five NSW universities, won a \$21.2 million grant to work with a range of school and community partners to improve participation.
- In [Victoria LEAP – Learn, Experience, Access Professions](#) was established with all nine universities and \$3.4 million to partner and focus on profiling the professions.

Many universities have been working in partnership but over time the significant funds needed to sustain these large projects have disappeared. The NCSEHE has put together a number of publications illustrating successful partnership work in the sector over time including [Partnerships in Higher Education](#)⁴ (2014) and [Higher Education Participation and Partnerships Program: Seven Years On](#)⁵ (2017). EPHEA is aware that the NCSEHE has provided a range of resources and research to the Government and the Opposition to highlight its work in bringing together research and practice for practitioners and the Sector.

⁴ <https://www.ncsehe.edu.au/wp-content/uploads/2014/12/NCSEHE-Partnership-Publication-Web.pdf>

⁵ https://www.ncsehe.edu.au/wp-content/uploads/2017/11/SevenYearsOfHEPPP_web.pdf

Opportunities to extend the life of these Consortia has been limited. Working in partnership with each other is challenging, especially without any support, guidance or incentives from the Commonwealth. In regional and remote areas there are additional costs associated with pre-access work, such as travel and staffing.

Collaborative outreach work is intuitive for equity practitioners but, by not mandating this behaviour and failing to provide sufficient funding, there is a danger that some institutions will revert to competitive rather than collaborative behaviours.

If the Government is keen to boost partnerships within the HE sector then the sort of competitive grants seen in 2011 need to be re-instated and spending on pre-access programs should be mandated with policies to incentivize collaboration between universities and undertake partnerships with other tertiary education providers and the not-for-profit sector.

Dr Zacharias's report also recommends ongoing funding for HEPPP (Recommendation 11) and remain a national program, with dedicated equity funding to all Australian universities and an explicit incentive to engage in cross-institutional partnerships. This has been a long-held desire of EPHEA over previous submissions and reviews in order to provide sustained and consistent support of projects in schools and communities, and to provide employment stability for equity practitioners in this space.

Broader issues with the guidelines and their enforcement

EPHEA understands that the Department of Education and Training is currently reviewing the [Other Grants Guidelines 2012](#) under the *Higher Education Support Act 2003* which have not been updated since 2014 and do not reflect the reviews of [HEPPP](#) and the [Disability Support Program \(DSP\)](#). EPHEA would like to make sure that some of the information provided here is taken into account and that the draft *Other Grants Guidelines* are provided to key stakeholders.

We would hope that any planned changes draw on existing recommendations from evaluations already undertaken. There has been a major evaluation of HEPPP⁶, DSP evaluation and relevant research projects⁷ provide the basis for substantial reform. Many of these recommendations have been implemented or are in the process of being implemented. An acceleration in the speed of reform may better support equity in higher education.

Ongoing support for HEPPP and ensuring a minimum spend by all universities on outreach in order to stimulate enough demand across the country to reach the national low SES target of 20% low SES students by 2020 is warranted. The ACIL Allen Report showed a 40% average spend in outreach space and so we recommend a minimum spend of 20%-30% range. This minimum spend reinforces the responsibility all universities have to raising aspirations and stimulating demand (regardless of their current enrolment share).

The confirmation of three-year funding cycles at the very least would also provide staff working in HEPPP-funded programs with stable and secure employment. Some equity practitioners have been on a series of one-year contracts since HEPPP's inception in 2009 and Universities are left to make late confirmations of budgets including confirmation of contracts. There are examples of institutions who have under-written HEPPP programs and staffing but this is increasingly difficult in the current climate.

Improved transparency and accountability of how HEPPP funding is being spent by universities. The HEPPP guidelines describe what is acceptable and unacceptable in both participation and partnership activities. The ACIL Allen Report (Recommendation 1) says that 'improved targeting' of low-SES in participation/support work is required, and could eventually occur via a robust evaluation framework but to 'maintain the current Guidelines approach to providing broad direction to universities on the activities which should be delivered.'

⁶ HEPPP Evaluation Final Report by ACIL Allen Consulting, in partnership with Wallis Consulting Group, to evaluate the Higher Education Participation and Partnerships Program (HEPPP), 2016.

⁷ Zacharias, N. (2017). [The Australian student Equity Programme and institutional change: Paradigm shift or business as usual?](#) The National Centre for Student Equity in Higher Education (NCSEHE). Curtin University: Perth and Brett, M. (2018). [Equity Performance and Accountability](#). The National Centre for Student Equity in Higher Education (NCSEHE). Curtin University: Perth.

Clauses 1.70 and 1.80 of the Guidelines have been crucial in ensuring that outreach does not become just another version of competitive recruitment. Any attempt to remove these clauses would see a dilution of the efficacy of this funding. These clauses have allowed equity practitioners to ensure that HEPPP funds are focused on the important work of stimulating interest/demand in higher education amongst LSES and other equity groups in our communities. The ACIL Allen report (Recommendation 3) explicitly identifies the misuse of outreach funds for recruitment and recommends 'focusing the HEPPP' so that universities understand their obligations.

The guidelines currently describe WP outreach as being targeted at communities (place-based) not individuals; reducing gaps and duplication through collaboration; focused on the long-term building of aspiration, awareness and achievement; and promoting tertiary education generally, not a single institution. The new program proposed by Labor should articulate similar conditions of funding to encourage collaborative initiatives which are developed in partnership with communities and in their best interest.

For the most part universities are adhering to the guidelines but there is certainly room to improve the efficacy of expenditure across the lifecycle and ensure universities are using the funding appropriately. Over the life of the HEPPP the Department of Education has failed to provide a robust evaluation framework for practitioners or provided feedback on the way funding has been used.

The most significant example that has been produced is the *Equity Initiatives Map*⁸ which builds on the *Critical Interventions Framework II*⁹. This visually intuitive tool allows institutions to develop an improved method of monitoring of annual expenditure and outcomes and guide strategic review and reform efforts of HEPPP activities.

Based on her analysis of HEPPP annual reports, Dr Zacharias suggests that Universities use the *Equity Initiatives Map* as a summary of their annual progress reports and that the Department publish all *Equity Initiatives Maps* on its website (Recommendation 1). This would provide regular updates on HEPPP implementation to the sector, increase accountability for HEPPP expenditure and effort and provide an efficient mechanism to share good practice and innovations across the sector.

We work regularly with the NCSEHE (National Centre for Student Equity in Higher Education) who should be charged with coordinating and synthesising the multiple research projects and undertaking relevant longitudinal surveys to ensure projects they have ongoing relevance to supporting HEPPP, avoiding duplication. This work could be supported by the Equity Research and Innovation Panel which was established in early 2017. EPHEA has recently secured a position on this Panel to ensure projects have a practitioner focus.

Recommendation 1:

Review the recommendations from the ACIL Allen report and Dr Zacharias' report to ensure recommendations are being enacted to improve and expand the HEPPP program to continue its strategic goals in a sustainable way. Consultation with the NCSEHE and EPHEA as well as the University sector more broadly is recommended.

⁸ Zacharias, N. (2017). The Australian student Equity Programme and institutional change: Paradigm shift or business as usual? The National Centre for Student Equity in Higher Education (NCSEHE). Curtin University: Perth. <https://www.ncsehe.edu.au/publications/the-australian-student-equity-programme-and-institutional-change-paradigm-shift-or-business-as-usual/>

⁹ *Critical Interventions Framework Part 2: Equity Initiatives in Australian Higher Education: A review of evidence of Impact*. Bennett, A., Naylor, R., Mellor, K., Brett, M., Gore, J., Harvey, A., Munn, B., James, R., Smith, M., and Whitty, G. (2015).

2. The lack of an integrated approach to tertiary education access and participation needs to focus on better transition between school, TAFE/VET and university

While HEPPP has been an opportunity for universities to work with schools and some VET providers to support aspiration to tertiary study there has been a mismatch between HEPPP-like funding at all levels of education which would further enhance the impact of HEPPP funded activities.

When the HEPPP was first introduced there was existing additional funding in disadvantaged schools (National Partnerships for LSES schools) which enhanced the partnerships between schools and universities. It allowed schools the breathing room and resources, especially in the form of dedicated staff, to work closely with universities on projects to improve access and participation in tertiary education.

As the NCSEHE publications demonstrate, there is much existing collaboration in place. Most universities have arrangements with VET providers to recognise VET qualifications as part of pathway provisions, recognition of prior learning or dual award arrangements and some providers are already dual sector institutions. But more can be done to facilitate these partnerships with appropriate levels of funding at school, VET and university level to facilitate activity that supports LSES student seamless access between school, VET and higher education sectors.

A unique student identifier is one way to assist in tracking the movement of students through different sectors and would also reduce the narrow focus of the current government around notions of attrition, retention and success rates used to define student success and institutional success. There is a great deal of mobility by students within and between sectors for a range of reasons and this is not well captured at present. We understand the Department of Education is already looking at this option as part of recommendations from the Higher Education Standards Panel report and support this introduction.

Universities will continue to work with the most disadvantaged schools to increase aspiration to tertiary education but funding for disadvantaged public schools is critical in addressing the particular needs of students at these schools in relation to educational attainment and to combat the impacts of issues such as race, poverty and disadvantage.

Recommendation 2:

Consult with key stakeholders about how to improve transitions between education sectors. Explore existing or potential research and practitioner knowledge which can assist in identifying how transitions between the sectors can better support access, participation and lifelong learning. And utilize a unique student identifier to assist in tracking students. A review of HEPPP-type funding at each education level requires exploration.

3. More targeted support for students from regional, rural and remote areas is needed

EPHEA is concerned that there is a lack of understanding about how to support students from regional and remote backgrounds. There's a misconception that this group is homogenous and access to higher education can be managed with income support and scholarships to help students relocate and/or access to regional campuses/hubs or online learning. Certainly those are valid options, however regional and remote students face complex, multidimensional issues in accessing and participating in higher education and then in accessing employment at the end of their degree – either in their home regions or in metropolitan locations.

The NCSEHE has a number of reports which identify the key issues and challenges as well as provide recommendations on improving access for people from regional and remote backgrounds to higher education. These reports include the NCSEHE Focus piece [“Successful outcomes for regional and remote students in](#)

[Australian higher education Issues, challenges, opportunities and recommendations](#)¹⁰ summarising recent research funded by the NCSEHE; Louise Pollard's Equity Fellowship report ["Remote student university success: an analysis of policy and practice"](#)¹¹ and the publication resulting from the [Building Legacy and Capacity Workshop on higher education participation and completion of regional and remote students](#). These research and policy papers from the NCSEHE show there are general issues that apply across the whole of regional Australia and affect all students from regional areas, but there are also unique issues specific to local areas. Each region and locality is subject to different levers and challenges influenced by education systems, location, employment and industry opportunities, cultural differences, climate change and alike.

We have raised some issues around income support in this paper with particular reference to relocation scholarships and Centrelink support (Section 7). In addition the cost of running programs for regional and remote students within the HEPPP is also challenging. It is absolutely vital that universities in both metropolitan and regional locations utilise the HEPPP to build aspiration and participation by regional and remote students which maximises choice for students. A suitable package of support via Centrelink and scholarships is part of this support. However, building aspiration in regional and remote areas is also more costly and has not been factored into HEPPP funding and so consideration of additional funding to support universities with robust programs for this cohort could be provided.

The Government's announcement for regional study hubs is supported by EPHEA and we hope that the investment in these hubs fosters strong collaboration with universities in these regions. There are national and international examples of best practice to draw on as well as our member expertise which demonstrates that these models work well where the Government invests in infrastructure, especially technology; leverages existing physical resources; and where programs are people-rich as is the case with many HEPPP-funded programs into the regions. At the same time, supporting our existing regional campuses is just as important as creating new hubs.

EPHEA would like some clarity from the Government and providers around course offerings at these regional hubs including access to enabling programs; options for flexible modes; specific strategies and curriculum to support Aboriginal and Torres Strait Islander peoples; and strategic alignment and connection to industry for work-integrated learning and graduate employment.

If the aim of regional hubs is to provide regional and remote students with opportunities to stay in their local communities then students need appropriate income support to allow them to study and/or undertake local job opportunities to sustain them. In many regional and remote communities there is limited paid work, limited housing, and other infrastructure to support students adequately.

Regional and remote students also deserve the right to choose larger regional centres and metropolitan cities to study but the burden of HECS-HELP (now at lower repayment thresholds) and limited scholarships, as well as living away from home, is an untenable burden for many students in regional and remote areas.

Recommendation 3:

Additional funding should be considered to support the specific needs of students from regional and remote areas. This funding should allow universities (whether metropolitan or regional) working with regional and remote students and communities to invest in collaborations relevant stakeholders that support the specific needs of this cohort. Greater transparency around regional hubs is also required to ensure that students studying in regional and remote learning hubs are receiving an adequate learning experience. Developing specific programs and supports that encourage students in regional and remote areas to students from Aboriginal and Torres Strait Islander backgrounds requires particular focus and should be led by Aboriginal and Torres Strait Islander people.

¹⁰ NCSEHE (2018). Successful outcomes for regional and remote students in Australian higher education Issues, challenges, opportunities and recommendations from research funded by the National Centre for Student Equity in Higher Education

¹¹ Pollard, L. (2018). Remote Student University Success: An Analysis of Policy and Practice. NCSEHE.

4. Flawed policy and funding settings through the Indigenous Student Success Program (ISSP) to support Aboriginal and Torres Strait Islander students needs to be addressed

We understand that our Indigenous colleagues are not satisfied with the reviewed structures and functions of the ISSP in its new structure and that the ISSP review and consultation will find that it is not practically supporting all the needs of Indigenous student support units within universities or the students themselves. A call for comment to [review the Indigenous Student Success Program \(ISSP\)](#) closed on 31 August, 2018 and consideration of the feedback will hopefully provide options to improve the current structure. The ISSP provides three forms of funding and currently there are challenges to its efficacy:

- **Scholarships.** Students are currently missing out on scholarships, especially students in remote areas and students who want to further their education in post-graduate realms. The often complex needs of Indigenous students are not properly supported by scholarships and some students are missing out altogether. There are limitations on dual holdings of scholarships which is confusing for students and often ends in students turning down scholarships or risking overpayments. There are implications for students who are part-time, have carer responsibilities, need to work or have cultural needs and the need to take extended breaks. Remote students are not adequately compensated for expensive travel back to their communities and can experience significant costs of relocating for study.
- **Tutorial Assistance.** The ISSP supports tutorial assistance under the Scheme but it requires providers to ‘prioritise towards activities that maximise outcomes for the majority of eligible students, rather than to concentrate high levels of support to a few specific individuals’. Unfortunately students often need a combination of both. There are often not enough tutors to support students, to support them in a culturally safe way, and to provide more targeted support even for a short period of time. Students with disabilities are provided with additional tutoring but Indigenous students are less likely to disclose they have a disability and so are missing out on this vital support.
- **Learning and support activities.** Consideration needs to be given to culturally appropriate teaching and learning activities which complement tutoring and at present this is not eligible under ISSP. If providers are to truly embed Indigenous perspectives into curriculum then further funding is need to support this and to provide additional professional development. In addition, there is no specific mention of activities which support widening participation. This is not specifically allowed under the ISSP and considered part of the HEPPP. While the HEPPP can support LSES students regardless of background, specific targeted funding to undertake appropriate outreach to Aboriginal and Torres Strait Islander peoples should be prioritized under ISSP and led by, or undertaken in partnership with, Indigenous Student Units and widening participation teams.

There is simply not enough funding through the ISSP to support all these activities appropriately.

Many of these issues were flagged by the Intensive Research Universities (IRU)¹² prior to the changes and recently Universities Australia¹³ have indicated additional considerations are needed including a move to multi-year funding cycles. Most important is the need to collaborate with those at the frontline – staff situated in Indigenous Education Units who understand the specific needs of their communities is essential.

Recommendation 4:

Consider closely the outcomes of the ISSP review. Consult broadly with Indigenous Education Units and other relevant stakeholders to finesse current ISSP funding and programs including scholarships and student income support, targeted outreach, and tutoring.

¹² IRU [Indigenous Student Success Program: designing to improve outcomes](#). December 2016

¹³ Universities Australia. (2018). [Submission to the post-implementation review of the ISSP](#). Canberra.

5. There is insufficient support through the Disability Support Program (DSP) to support students with disabilities within higher education

The number of students with disabilities who enter higher education was 6.29% (18,015) in 2017 from 3.52% (6,593) in 2008¹⁴. This is three times as many students over a 10 year period who have commenced higher education. Overall participation by students with disabilities is 6.77%. This increase can be attributed to uncapped places, better access through widening participation programs, and the NDIS. However, despite this increase the amount of funding to support students with disabilities has not increased over the last 5 years and is not keeping pace with need.

The Higher Education Disability Support Program was reviewed in [2015 by KPMG Evaluation of the Disability Support Program \(DSP\)](#) and the sector is still waiting for some of the outcomes from this review to be determined. Key recommendations include:

- **Increased funding to the sector to support the wide range of supports needed to encourage and retain students with disabilities.** This is particularly important as the number of students with complex needs (including people with mental health conditions) access higher education. Currently about \$9.5 million is provided to the sector and providers receive about 50-60% reimbursement on costs incurred (this does not include staffing). Specialist staffing in this area is particularly crucial, as is the need for funding to support technology, specialized equipment and ongoing training.
- **Funding which is ring-fenced from other funds solely to support students with disabilities.** It is important to separate this specific and targeted funding from HEPPP.
- **A change to reporting and eligibility to make reporting less burdensome** to providers. The current claim-back process is very laborious and consideration of ways to reduce this process were recommended.
- **Clarity around some of the guidelines** to help providers manage the funds appropriately.
- **An expanded role for ADCET** to better support training to staff in the sector.

ADCET in particular requires more funding to sustain it. It is a valuable 'one-stop shop' that provides easy access to relevant and up-to-date information for the sector. Not only is there a broad range and depth of resources that can be accessed when needed, ADCET is proactive in providing information through the Newsletter, Webinars and social media channels, linking and connecting those who work, study, teach or research.

ADCET's annual allocation is 1% of the DSP (about \$80,000). From key finding of the evaluation report in 2015 states 'The DSP contributes to building higher education providers' awareness of and access to contemporary research and practice materials relating to inclusive teaching and learning practices and support for students with a disability. This has primarily occurred via funding for ADCET.'

The evaluation also found all external organisations consulted discussed the importance of ADCET to the sector. Notably, the Australian Tertiary Education Network on Disability (ATEND) and Equity Practitioners in Higher Education Australasia (EPHEA) felt that ADCET would benefit from additional funding.

Currently the ADCET website provides an authoritative resource for disability support and teaching staff helping to inform responses to individual students and emerging issues. The KPMG review made recommendations for expanding ADCET to ensure it continues as an authoritative source including expanding to three-year funding cycles.

¹⁴ [2017 Appendix 5 Table 11.2 - Equity performance data of commencing domestic undergraduate student with a disability](#)

Recommendation 5:

Revisit the recommendations of the KPMG report of the DSP to increase funding for this program and streamline program details to support more students with disabilities in the higher education sector. In particular, an increase in the amount of funding to ADCET is highly recommended.

6. Abolishing free enabling programs as tried and tested pathways for equity group student is a threat to equitable access and participation in tertiary education

The Higher Education Reform Package announced in 2017 saw a focus on enabling programs that would have decimated an important pillar of equity education by imposing fees on those wishing to utilize enabling programs to return to tertiary study.

This would have seen those students who can least afford fees to be subject to fees of around \$3000 and would significantly deter LSES students from enrolling in higher education. Aspiring students who require additional preparation prior to undertaking undergraduate studies, would now face the prospect of an increased burden of debt to achieve their educational goals.

These reforms would have been particularly harmful to regional institutions, who are often the major providers of enabling programs; institutions that serve demographic regions with high proportions of low SES, Indigenous, nEsb and migrant students, and regional and remote students.

The reform package proposed fixed numbers of enabling places allocated across university and non-university providers on a three-year cyclical competitive tender basis and of course, subject to fees. Unfortunately, the Government used flawed DET statistics that argue only 52% of Commonwealth supported students continue study in the following year, compared to 61% of fee-paying enabling students. However, this data was related to students who enrol in fee-paying enabling programs are already adequately financially endowed to be able to afford to do so.

A [2016 report led by Dr Tim Pitman](#) in collaboration with the NCSEHE showed that:

- A greater proportion of students enrolled in and transitioning via enabling pathways are from recognised equity groups than any of the other sub-bachelor pathways examined.
- In terms of raw numbers, enabling programs are second only to VET studies in transitioning more equity-group students to Bachelor-level studies than the other sub-bachelor pathways examined.
- Students from recognised equity groups who articulate via an enabling program generally experience better first-year retention rates than those articulating via most other sub-bachelor pathways.

EPHEA and the [National Association of Enabling Educators Australia](#) are working together to ensure that enabling programs are retained as fee-free options for LSES people as an access pathway. An article in *The Conversation (May 2017)*¹⁵ illustrates best the key issues with previous reforms. We urge the changes announced¹⁶ by the Government around a new distribution mechanism for enabling courses to be reconsidered. It will not 'better match places to student need'. There has been limited consultation with stakeholders in 2018 about this change leaving a very short lead time for providers and prospective students alike.

Recently EPHEA was invited to the NAEAA Symposium (27-28 November) and heard directly from students whose lives had changed as a result of enabling. Two were pursuing undergraduate studies, one has recently

¹⁵ The Conversation, May 18, 2017. [Programs that prepare students for university study may no longer be free](#) by Anna Bennett, Andrew Harvey and Seamus Fagan

¹⁶ https://www.education.gov.au/higher-education-policy-changes-provider-faqs?utm_campaign=website&utm_source=sendgrid.com&utm_medium=email

completed her teaching degree, one has completed a PhD, one is a Lecturer. All said they would not have been able to access an enabling program if there were fees attached due to their precarious circumstances.

The NAEAA membership are passionate about protecting free access for students; highlighting the unique position of enabling in the student journey to higher education; and producing quality pedagogy that supports the diverse groups who access it such as Aboriginal and Torres Strait Islander peoples, people from non English-speaking backgrounds, people with disabilities and first-in-family participants. Both EPHEA and NAEAA recognize there are elements of these programs that could be improved and welcome the opportunity to provide more detail about these improvements.

Recommendation 6:

Retain enabling programs as a free programs which support access and tertiary preparedness to equity groups. Look for ways to improve portability and consistency of programs while still retaining the unique pedagogies that support a range of equity groups towards bachelor degree program. Delay any radical changes to the funding and allocation of enabling places until proper consultation with the sector, including the National Association of Enabling Educations Australia.

7. Detrimental changes to Commonwealth Scholarships directly supporting low-income students requires urgent review

An article written by NCSEHE Visiting Fellow Ms Mary Kelly, a long-standing and well-respected equity practitioner, titled [‘Will the real Commonwealth Scholarships please stand’](#)¹⁷ best frames the current policy dilemma around Commonwealth Scholarships.

Since the introduction of Commonwealth Learning Scholarships by the Liberal Government in 2004 there has been a steady deterioration of this program to the detriment of LSES students. Changes over time include:

- The introduction of Commonwealth Learning Scholarships (CLS) to support education and living costs for students were issued by universities to needy students. The combination of deferring HECS-HELP and have this support (as well as options for Centrelink benefits) meant LSES students could ‘survive’ at university and spend less time in paid employment.
- By 2010 these Scholarships were renamed Start-Up and Relocation Scholarships and moved to Department of Human Services under Centrelink. This has been an effective linking of study payments such as Youth Allowance, Austudy and Abstudy with scholarships.
- In 2017 however, the Liberal Government converted the Start-Up Scholarship to a loan increasing the pressure on students covering education costs. Centrelink benefits, which have not kept pace with costs of living, and additional obligations for students on some payments (job searching) are impacting the ability of LSES students to access higher education. Relocation Scholarship guidelines have narrowed reducing the opportunities for students to move within regional locations or to urban locations for their course of choice.

The latest *Student Finances Survey (2017)*¹⁸ produced by Universities Australia – a survey of student finances that has been charting the cost of living challenges of students since the 1970s – continues to show a student population under severe financial pressure. Some of the stark statistics for students from this survey include:

- Contrast between the financial wellness of Indigenous versus non-Indigenous students
- One in seven domestic students say they regularly go without food or other necessities because they can't afford them.
- Three in five domestic students say their finances are a source of worry

¹⁷ <https://www.ncsehe.edu.au/will-real-commonwealth-scholarships-please-stand/>

¹⁸ <https://www.universitiesaustralia.edu.au/Media-and-Events/submissions-and-reports/Students-Finances-Survey-2017>

- Four in five domestic students have a job while studying. However, the amount of paid work they need to do to support themselves financially comes at a cost to their studies.

Most students rely on a combination of HECS-HELP, Centrelink, part-time work and scholarships to make ends meet. When multiple policy settings change, the negative impact is compounded. How can we hope to entice LSES students to pursue higher education when faced with higher debt? The repayment threshold for HECS-HELP will drop to \$45k in 2019/2020; this HECS debt is compounded if a student needs a Commonwealth Start-Up loan. Reduced Centrelink payments which are not keeping up with costs of living and pressure to take on greater amounts of paid work to make ends meet is also deterring future students from LSES backgrounds.

Many students who are engaged in part-time courses do so due to disability or medical conditions. Employment opportunities during and following study¹⁹ can be harder for people with disabilities and accessing educational opportunities. Without suitable financial support students with disabilities struggle to stay at university.

Similarly, the outcomes those engaged in post-graduate coursework to upskill and who are relying on Newstart Allowance as their own income support are now having to comply with a new job search regime where they have to create a Job Plan and report fortnightly even though their job plan is to upskill. The Council of Australian Postgraduate Association's [discussion paper](#) outlines particular issues addressing the ability of equity groups to progress to, and be retained in, post-graduate study because of the current funding measures for this cohort.

Finally, students who take longer to complete due to disability, financial status, caring responsibilities or other complex life circumstances will also be impacted by the FEE-HELP lifetime limit from 2020. Lifetime limits assume that students have smooth and straightforward pathways. Many students have undertaken VET programs and enabling courses prior to commencing university and perhaps have made poor course choices or have had disappointing results. This will also affect students who are studying a Commonwealth supported undergraduate degree followed by a full-fee paying professional postgraduate degree. For example, a student doing a Bachelor of Arts followed by a Juris Doctor at the University of Melbourne would have to come up with \$40,000 upfront – more if they ever changed course or failed a unit. A lifetime limit doesn't allow students to change their mind, recover from poor results, manage disability or carer responsibilities.

Recommendation 7:

Review the current Scholarships package in order to reinstate Start-Up Scholarships as scholarships not loans for the benefit of students who identify as students who are from low-SES backgrounds. Consider better support for low-SES students to enable them to progress to post-graduate opportunities.

8. Reduction in the income threshold for HECS-HELP is a deterrent to low-income students' access to higher education

EPHEA wrote to all Senators (26 July, 2018; Appendix 1) to express our concerns about the proposed changes in the *Higher Education Support Legislation Amendment (Student Loan Sustainability) Bill 2018* which was eventually passed. We are concerned that the impact of these changes will:

- **Further deter debt-averse low-income students** from higher education and create hardship for low-income graduates repaying their debts.

¹⁹ The 2017 *Graduate Destinations Report* showed graduates with a disability in full-time employment at 61.5% compared with those without a disability at 72.4%. Quality Indicators for Learning and Teaching (QILT). (2018). *Graduate Outcomes Survey 2017*. Retrieved from <https://www.qilt.edu.au/>

- **ignore the influence of the gender wage gap** on repayment opportunities, which impacts many women negatively, as they are more likely to have time away from paid employment for caring responsibilities, but accrue interest on their debt during employment gaps.
- introduces a **combined loan limit will negatively impact low-SES students** who incur debts through pre-tertiary programs; through VET programs used as pathways to university; or who need to undertake compulsory post-graduate qualifications such as in areas like teaching, nursing, law, accountancy, medicine. In addition, students who have made poor course choices and failed or students who have a disability which has impacted their performance are at risk of not completing within the imposed loan limit.

Recommendation 8:

Reverse or amend the *Higher Education Support Legislation Amendment (Student Loan Sustainability) Bill 2018* to take into account the particular impact on disadvantaged groups who will be most affected by this Bill such as LSES people, people with disabilities, and which addressed the gender equity issues that particularly impact people with carer responsibilities.

9. Limitations to HECS-HELP for some domestic students, in particular, NZ citizens who have, and will, contribute to the Australian economy needs to be reviewed

In June 2017 EPHEA provided a statement to the Senate Education and Employment Committee on the *Higher Education Support Legislation Amendment Bill 2017* to recommend changes to this proposal which would disadvantage NZ citizens who wish to engage in tertiary education.

A high proportion of New Zealanders who migrate to Australia choose to make a permanent life for themselves in Australia and there are significant populations across Australia. The Department of Immigration and Border Protection estimated that over 640,700 were in Australia in 2016²⁰. In 2015 over 12,000 students were enrolled at tertiary institutions ploughing valuable funds/taxes into the sector²¹. As equity practitioners we have no doubt that many more students would be accessing higher education if barriers to participation such as upfront or high tuition fees were reduced.

EPHEA and the sector have previously advocated for fairer access to higher education for New Zealand citizens residing in Australia, particularly in relation to students from low socio-economic (low-SES) backgrounds. Universities across Australia have recognized the need to work closely with Maori and Pacific Islanders and NZ from diverse backgrounds who have migrated to Australia as New Zealand citizens and support them to access higher education.

While we were heartened to see changes to New Zealand citizens who have lived in Australia for at least 10 years and arrived as children were granted access to HECS-HELP in January 2016 this is simply not enough. The Trans-Tasman Travel Agreement which allows indefinite rights to work but no access to social security supports, education, or voting rights continues to be problematic for NZ citizens who have chosen Australia as their home.

Lack of HECS-HELP has continued to be a considerable barrier for prospective students who have lived in Australia for less than 10 years. While a small number of students have found ways to pay their fees upfront (through part-time work and part-time study, delaying their commencement or moving in and out of study) many more find they cannot access tertiary education.

²⁰ Department of Immigration and Border Control. Fact sheet - New Zealanders in Australia
<https://www.border.gov.au/about/corporate/information/fact-sheets/17nz>

²¹ Department of Education and Training Higher Education Statistics: Table 2.10: All Students by State, Higher Education Institution, Citizenship and Residence Status, Full Year 2015: <https://www.education.gov.au/selected-higher-education-statistics-2015-student-data>

We recommend that New Zealand citizens residing in Australia should retain access to Commonwealth Supported Places (CSPs) for the following reasons:

- **New Zealanders seeking to access Australian higher education are more akin to domestic students than international students.** They are likely to be long-term Australian residents who have been educated in Australia and for whom Australia is home and whose families have contributed to Australian economy and through positive contributions to Australian society.
- **The Federal Government has committed to assisting people from disadvantaged backgrounds through programs such as the Higher Education Partnerships and Participation Program (HEPPP).** This recognizes that education is the key to better socioeconomic outcomes for individuals and communities. Many Maori and Pasifika peoples and NZ citizens from diverse backgrounds living in Australia are from low-income backgrounds and in HEPPP activities are supported as such but their full participation in higher education is prevented by upfront fees. This runs counter to equity ambitions by excluding a significant cohort from access to better educational and employment opportunities.
- **People from low income backgrounds tend to be debt averse.** They are much more reluctant than those from affluent backgrounds to commit large amounts of money to tertiary education even when CSPs and student loans are available. Hence the need for programs such as the HEPPP. A cost–benefit analysis of the debt incurred by a full-fee student loans makes higher education unattractive to people from low-income backgrounds particularly when other priorities are taken into consideration. This is particularly true for prospective students from Maori and Pacific Islander backgrounds and people from other diverse cultural backgrounds who have cultural obligations to contribute financially to their wider family. Many prospective students also have ambitions to start a family and/or buy a house in Australia which are difficult to achieve while paying back a large student debt. This view is borne out in the human stories below.
- **It is important to note that New Zealand citizens have limited pathways to citizenship.** Hence, the situation New Zealand citizens find themselves in is different to that of Permanent Residents who have the opportunity to become citizens, and hence qualify for CSPs, after a waiting period. This will be partially rectified by a new pathway to citizenship for NZ citizens that will become available from 1 July 2022. However, as there will be a minimum time lag of two years before eligible New Zealand citizens are granted citizenship, this will be of no assistance in the short-term. There is a considerable cohort of young people whose parents do not earn enough to qualify for this pathway to citizenship. They have few options beyond low-skilled, low paying jobs even when they have qualified academically for university study.

Our members cite a range of examples of students and families who will be cut-off from options with these changes. Some examples are included in EPHEA's statement on the NZ citizenship issue at www.ephea.org/media-releases

Recommendation 9:

Allow all New Zealand citizens who have lived in Australia for at least three years access to deferred HECS-HELP loans (this is in line with the arrangements for Australians who live in New Zealand).

²² From 1 July 2017 New Zealand citizens who moved to Australia between 2001 and 2016 who have earned at least \$53,900 for the past five years will be eligible to apply for Permanent Residency subject to character and health requirements. See: <https://www.border.gov.au/Visasupport/Pages/an-additional-pathway.aspx>

10. Cuts to higher education of over \$2.1 billion dollars need to be reverse

Changes announced in December 2017 with the release of MYEFO brought about a \$2.1 billion cut to higher education, Australia's third largest export sector. According to the Grattan Institute²³ this sector attracted revenues of over \$38 billion in 2016-2017 including:

- International student revenue of \$9 billion annually
- Billions of dollars in research and teaching grants
- Job creation for thousands of academic and professional staff nationwide
- Contributions to related industries such as tourism, hospitality, technology, procurement, entrepreneurship and development of strong industry partnerships for commercial, research and work-integrated learning activities
- Producing high quality graduates who support other Australian sectors through jobs.

The Government's recent cuts to funding are detrimental to the prosperity of our economy across all sectors by limiting the number of graduates by capping places and reducing the HE workforce in teaching, research and professional positions. Between 2021 and 2025, Australia will experience a strong rise in the 18-25 year-old population²⁴. If this combines with a significant increase in demand for retraining of older people, not unlikely in light of the accelerating automation and digitisation of the economy, there would be real competition for university places in a capped environment. In such a constrained system, high performing school leavers would likely receive access over anyone else, reverting any gains made towards more equitable participation over the previous 10 years.

The Universities Australia '[Keep it Clever' policy](#) – a policy with bipartisan support – outlines the key drivers of economic, technological and social change that Australia will face in the coming decades. If we don't have a robust and well-funded education system which is training industry-ready graduates that can compete both in Australia and on the global stage then Australia will fall behind.

Cutting HE funding is short-sighted and in particular limits access to education for people from low-income backgrounds who can change their own lives and the lives of their families and communities in beneficial ways. The Grattan Institute report also shows the students who pursue a university degree enjoy greater earnings than those whose highest attainment is Year 12. There is some work to do around gender pay gaps but without wide access to higher education many young people as well as those who are re-training will be worse off over time.

If we don't want to see the gap widen in tertiary education participation for students from Aboriginal and Torres Strait Islander backgrounds and for people in equity groups then we need to commit to returning funding to the sector that supports demand-driven funding and specific strategies to support equity groups.

The National Centre for Student Equity in Higher Education (NCSEHE) has just released a discussion paper "[Student Equity 2030: A long-term strategic vision for student equity in higher education](#)" and is undertaking consultation with the sector in a series of [roundtable discussions](#) currently underway. This paper and the resulting process has and will capture important policy considerations for the future with key voices from sector.

Recommendation 10:

Work with key stakeholders such as Universities Australia to restore appropriate funding to the sector that ensures the widest participation possible, with particular focus on funding and strategies that support Aboriginal and Torres Strait Islander backgrounds, students from LSES communities, students from refugee and migrant backgrounds, students with disabilities and low-income students from rural, regional and remote backgrounds.

²³ [Grattan Institute \(2018\) Mapping Australian higher education, 2018, p.45](#)

²⁴ <https://theconversation.com/capping-university-places-will-mean-a-less-skilled-and-diverse-workforce-95525>



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We welcome the opportunity to be involved in discussions over the coming months to discuss many of the issues above that are of concern to our members. Please do not hesitate to contact us for further information.

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