UniSC

UNIVERSITIES ACCORD (STUDENT SUPPORT AND OTHER MEASURES) BILL 2024

University of the Sunshine Coast submission

September 2024

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Introduction

The University of the Sunshine Coast (UniSC) is pleased to provide feedback on the *Universities Accord (Student Support and Other Measures) Bill 2024* (the Bill).

UniSC endorses the submissions from Universities Australia (UA) and the Regional Universities Network (RUN). Our submission therefore seeks to reinforce some of the key points made in those submissions and provide additional perspectives and ideas for consideration.

UniSC comments on Schedules 1-4 of the Bill

Schedule 1 - HELP Indexation

UniSC supports the intent of Schedule 1 of the Bill.

However, we note this simply adjusts the indexation of existing and future debt and does not provide cost of living relief as graduates repaying their debt will continue to pay the associated rate according to their income. A more tangible reform to address higher education affordability and value for money considerations, that would also support the Government's participation and attainment targets, would be to review and reset student tuition contribution levels.

Recommendations

1. *The Australian Government prioritise the adjustment of student contribution levels to deliver a more tangible pricing signal for prospective students.*

Schedule 2 – SSAF Changes

UniSC supports the intent of Schedule 2 of the Bill.

However, we are unclear as to how the Government determined that 40 percent is the appropriate allocation of SSAF revenue given the enormous variation in individual university circumstances. We argue that given individual universities will become responsible for administering, reporting on and ensuring compliance for these payments and that they are best placed to consult with their student led organisations on student expenditure priorities and respective delivery capabilities, universities should be given the autonomy to negotiate a SSFA allocation percentage suitable to their needs. For example, UniSC believes that a 20 percent of SSAF revenue is a more appropriate allocation for our student led organisations to minimise impact on the efficient delivery of existing core student services and in recognition of our increased obligations under the Support for Students policy.

UniSC further notes a lack of clarity in the Bill with respect to:

- The definition of a student led organisation. The Department of Education has indicated this will be addressed in the associated implementation Guidelines, therefore UniSC argues that the definition in the Bill be removed and instead included in the Guidelines where future amendments can be more easily made.
- The scope of activities and services that student led organisations can use SSAF revenue for given each university will remain legally accountable for all SSAF expenditure, including reporting and compliance. This lack of clarity also risks duplication of public funding expenditure.
- The governance role for universities in relation to student led organisations given their additional responsibilities following this reform. This lack of clarity risks actual or perceived interreference by universities in the independence of student led organisations.
- A process for universities to monitor and report concerns about the way student led organisations expend their revenue allocation.
- University responsibilities for student led organisations (e.g. student guilds) established in university Acts (mostly State legislation) which may not align with the intent of this reform.

Recommendations

2. *The Government clarify how it determined a standard 40 percent allocation of SSAF revenue given the enormous variation in individual university circumstances.*
3. *The Bill provides universities with the autonomy to negotiate student led organisation SSAF revenue allocation suitable to their individual university circumstances.*
4. *The currently inadequate definition of a 'student led organisation' be removed from the Bill, further consultation undertaken with the sector on an appropriate definition and the agreed definition included in the SSAF implementation guidelines.*
5. *The Bill notes the importance of clear SSAF revenue expenditure guidelines for student led organisations, that these be agreed in consultation with the sector and included in the SSAF implementation guidelines.*
6. *The Bill clarifies the governance role for universities in relation to student led organisations with respect to expenditure of SSAF revenue.*
7. *The Bill identifies a clear process for universities to monitor and report concerns about the expenditure of SSAF revenue by student led organisations.*
8. *The Bill or SSAF implementation guidelines address university risk where their responsibilities for student led organisations such as student guilds are established in university Acts.*

Schedule 3 – FEE-FREE Uni Ready Courses

UniSC supports the intent of Schedule 3 of the Bill.

However, we argue the Bill should confirm university autonomy to develop and deliver FEE-FREE Uni Ready Courses as relevant to their local context and student needs. UniSC would be concerned if we were required to deliver nationally generic courses that were unsuitable for students in our regions.

Recommendations

9. *The Bill confirms university autonomy to develop and deliver FEE-FREE Uni Ready Courses as relevant to their local context and student needs.*

Schedule 4 – Commonwealth Prac Payments

UniSC supports the intent of Schedule 4 of the Bill.

However we are concerned with several elements.

UniSC strongly argues that the Government should be responsible for administering these payments (either via Services Australia or the Department of Education) rather than universities, consistent with other income support payments. We further note this is the proposed approach for VET students i.e. payments made by the Department of Employment and Workplace Relations. It will be problematic and resource intensive for universities to administer these payments, particularly smaller institutions like UniSC with a high proportion of potentially eligible students and who are already administratively stretched to simply coordinate the actual placements. Universities administering payments also significantly increases the risk of inconsistencies e.g. assessment of eligibility, payment timeframes, payment amounts (particularly with respect to variable payment levels under a means testing approach) and dispute processes. Should the Government require universities to administer these payments, detailed guidelines which sufficiently de-risk the implementation issues noted above must be made available as soon as possible, the commencement date must be delayed to allow universities time to prepare administrative and resourcing arrangements and appropriate funding must be provided to universities to cover the additional costs involved.

The Bill does not define which students will be eligible for the payment and we believe this definition (similar to the definition in the Department of Education's fact sheet) should be in the Bill rather than the implementation guidelines.

The Bill is not clear as to whether Government funding will cover all eligible students (i.e. 'demand driven') or if the scheme will operate on a first come first served basis until the available annual funding is fully allocated. If potentially eligible students have doubts about receiving the payment due to 'quotas', this may influence their decision to enrol from a financial consideration perspective. If universities are administering these payments, it risks student complaints and reputation damage for the institution if eligible students are denied payments due to funding shortfalls.

UniSC argues that the single Austudy rate will be an insufficient quantum for many students whose earnings are, by necessity, higher and thus the gap may be more than some students can forgo to undertake their placement. This issue will be more significant if payments are tapered according to student earnings.

Recommendations

10. *The Bill confirm that payments will be administered by the Government rather than universities. If not, the guidelines be provided as soon as possible, the commencement date delayed to allow time for universities to prepare and funding be provided to offset additional university costs.*
11. *The Bill define which students will be eligible for these payments.*
12. *The Bill clarifies if Government funding will support a demand driven payment scheme if not, what the annual Budget and individual university allocation process will be.*
13. *The Government consider a higher payment rate than the proposed single Austudy rate.*