

# Australasian Council of Deans of Arts, Social Sciences and Humanities

## Australian Tertiary Education Commission

DASSH welcomes the opportunity to give feedback on the proposed Australian Tertiary Education Commission Implementation Consultation Paper.

The [Australasian Council of Deans of Arts, Social Sciences and Humanities](#) represents more than 250 Deans, and Associate and Deputy Deans, from 44 universities across Australia and Aotearoa New Zealand, leading schools and faculties that teach tens of thousands of students and several thousand scholars. DASSH supports those who have responsibility for governance and management of research, teaching and learning across those member institutions. DASSH members were consulted widely as part of this submission process.

### **1. How can the ATEC be set up so that it has sufficient expertise in the higher education sector while maintaining its focus on decision making that is in the national interest, rather than sectoral interest?**

The government has indicated that the ATEC will be led by a Chief Commissioner who will be assisted by two Deputy Commissioners and a First Nations Commissioner. As a requirement of their positions, all Commissioners will need to demonstrate their independence from the tertiary sector.

While it is important that the Commissioners maintain independence and avoid any conflicts of interest, this should not preclude those with experience in the higher education sector from undertaking these roles.

Having sectoral experience should not be viewed as being at odds with the national interest. Instead, it is vital that those leading ATEC have in-depth knowledge of the higher education sector to enable them to undertake their role effectively.

In order to maintain impartiality, we recommend that the government prohibit individuals from becoming a Commissioner if they have held a position in the higher education sector within the past 18 months. This is in keeping with national guidelines which prohibit ministers from engaging in lobbying relating to any matters for which they had official dealings in their last 18 months in office.

In addition, we strongly support the appointment of a First Nations Commissioner. We encourage the government to establish a similar position to oversee efforts at increasing participation among low-SES cohorts. Having a dedicated Commissioner for priority areas will help fulfill the government's goal of increasing participation, particularly among under-represented cohorts. It is vital that this cohort has a visible representative in the leadership group within the ATEC.

In order to further the government's objective of greater harmonisation between the higher education and VET sectors, we recommend the ATEC also includes a Commissioner who is responsible for bridging the gap between both sectors.

**3. Does the proposed structure of the Commission, including consultation with other relevant stakeholders (pages 3-4), allow for an effective decision-making process?**

DASSH welcomes the commitment to engaging with relevant stakeholders as has been outlined in the Consultation Paper.

It is vital that the Commission's parameters are clearly defined at the outset to reduce inefficiencies and mission creep.

Australia can look towards Aotearoa New Zealand as a useful example of a Tertiary Education Commission in practice. We are in a fortunate position as a regional body to share the experiences of our Aotearoa New Zealand members. In the Aotearoa New Zealand context, the separation of roles between the Department and the Commission has at times been unclear which has led to inefficiency within the sector.

One of the ATEC's proposed functions is to manage research programs and advise on research policy. It is not clear from the Consultation Paper how the ATEC will share this role with other organisations, such as the Australian Research Council (ARC).

Our members have raised some concerns about the Commission's independence from government. The Consultation Paper indicates that the Minister will have statutory powers to direct the ATEC. The Commission will also be responsible for delivering government objectives. It is important that the Commission be independent whilst delivering on its mandate.

#### **4. What does effective stewardship look like for the ATEC? What levers should the ATEC have to steward the sector?**

Our members have raised concerns that the ATEC will contribute to the increasing regulatory and administrative cost of higher education and will limit academic influence over the core functions of the university. This poses a risk not only to the humanities, arts and social sciences, but to the sector more broadly, particularly at a time when the sector is facing significant financial pressures. The bureaucratisation of higher education risks diverting resources away from the core university functions of teaching and research.

DASSH Members recommend the Commission seek to minimise regulatory burden and mission creep, particularly around reporting requirements. Our members have indicated that monitoring and data collection requirements are already burdensome. In addition to developing higher quality metrics, the Commission should aim to streamline data collection processes to reduce the burden of reporting requirements. It is critical that the quality and usability of data be improved to allow the ATEC and others to make informed policy decisions about the sector.

#### **5. How can the ATEC seek the regular information and advice it needs to operate, while ensuring minimal additional regulatory burden on the sector?**

Part of the ATEC's role will be to monitor and analyse higher education provider and sector performance and to deliver new higher education quality metrics. To achieve both of these objectives, the Commission will need to implement a new system for the collection and collation of higher education data.

Through our own research, we have discovered that there are significant limitations around how student enrolment and staff numbers are captured by the Department of Education. This is due, in part, to the lack of clear guidelines and consistency around how institutions collate and report this data.

This lack of consistency makes it difficult to determine the true number of students studying courses in each discipline. There is also a lack of discipline-specific data on the number of casual staff across the higher education sector. Without accurate data, it is impossible to develop effective policies.

The ATEC is in a valuable position to spearhead reform of higher education data collection and this should be the first task it undertakes. Producing higher quality data is essential for the effective development of evidence-based policy.

Any new data collection processes should be developed in consultation with relevant stakeholders. A distinction must be made between the gathering of data and the setting of performance targets.

The government has also announced that it will be testing a National Skills Passport and will be implementing a National Skills Taxonomy to replace the existing Australian Skills Classification.

The development of both initiatives must be based on high quality data which reflects the full range of skills needed across Australia's job market as well as national capabilities. We recommend the Commission work with relevant stakeholders, including Jobs and Skills Australia (JSA) and individual institutions, to compile an accurate skills taxonomy which takes into account the complex skills and knowledge acquired by humanities, arts and social science graduates. DASSH will also be making a submission to the JSA skills taxonomy consultation.

## **6. What does a successful tertiary future state look like and how can the governance of the ATEC help to achieve this?**

A successful sector is one that is low-cost for students, world leading in its knowledge creation and research, welcoming to students of all backgrounds, transformative for society and one that fuels not only Australia's economy but the capabilities that allow us to enjoy a healthy democracy, regional security, effective social and health policies and the ability to engage ethically with emerging artificial intelligence technology for example.

As indicated in the Consultation Paper, the Commission will be responsible for implementing and negotiating mission-based compacts with higher education providers, including the government's proposed Managed Growth Targets which involves placing caps on the number of Commonwealth supported places at individual institutions.

Our members have raised concerns that the establishment of Managed Growth Targets may stifle the ability of institutions to implement creative and effective responses to student demand.

In the context of decision making around disciplinary offerings it is critical that Australia's national capabilities and knowledge are foregrounded, not simply vocational skills. While there may be skills shortages in certain industries, Australia risks its ability to undertake diplomacy within its own region for example if students are guided away from undertaking language studies.

There could be similar unintended consequences for a wide range of national capabilities, as well as the health of our democracy and our ability to effectively implement critical policies around health, the environment and artificial intelligence for example.

Our disciplines are home to many of the students which the government is seeking to increase participation among. According to departmental data, in 2022, more than 30,000 remote and regional students and almost 30,000 students from low-SES families studied Society and Culture courses, many of which are in the arts field. Nearly 5,000 First Nations students and around 28,000 students with a disability were also enrolled.

The government has indicated institutions will be able to enrol above their Managed Growth Targets when enrolling First Nations students in demand-driven higher education courses. Students from other equity backgrounds will be guaranteed a fully-funded Commonwealth supported place if they gain admission but will not be guaranteed a place at their chosen university.

DASSH recommends the exemption for First Nations students be widened to include all students in under-represented areas, including low-SES and regional students, as well as those living with a disability. Students in these areas already face challenges attending university. Limiting these students' choices runs counter to the government's aim of increasing participation among under-represented cohorts

The Commission is also in an ideal position to work with institutions to ensure that universities are well placed to receive and make comfortable students from all backgrounds. This is especially important where the future of Australia's economy depends on the greater uptake of higher education opportunities by non-traditional cohorts that may have had no prior family or personal experience with universities.

## **7. How can the ATEC be designed to maximise harmonisation between the two tertiary education systems?**

- **What are the steps needed for harmonisation and how should they be timed/staged?**
- **How should States and Territories be engaged in this process?**

DASSH welcomes the ATEC's objective of fostering greater alignment between the higher education and VET sectors. Our members are enthusiastic about the opportunities afforded by greater harmonisation with the VET sector, including gaining access to specialised facilities which are only available within the VET sector.

Fostering greater alignment between the higher education and VET sectors will require a greater understanding of the current barriers to cooperation. There also needs to be a greater awareness of the opportunities for engagement at the disciplinary level.

The ATEC is well placed to undertake this work through consultation with relevant stakeholders and with an eye to other contexts where greater alignment between both sectors has been achieved, such as in the United Kingdom.

While greater harmonisation between the higher education and VET sectors poses significant opportunities for both sectors, it is important that the distinctions between both sectors are recognised and upheld, particularly the emphasis and specialisation in research undertaken in the higher education sector.