



**Australian Vice-Chancellors' Committee**  
*the council of Australia's university presidents*

***Ensuring fair access: future arrangements  
for the Higher Education Equity  
Programme***

**June 2004**

## **Ensuring fair access: the AVCC response to Government discussion paper on future arrangements for the Higher Education Equity Programme**

1. Overview.....	1
2. Timing of resolution of future arrangements .....	4
3. The relationship of the equity framework to HEEP and other equity programs .....	5
4. Updating the equity framework .....	6
5. HEEP funding arrangements.....	11

## 1. Overview

The Government's higher education reform package *Our Universities: Backing Australia's Future*, announced by the Minister Dr Nelson in 2003, included additional funds for the Higher Education Equity Programme (HEEP), the Students with Disabilities Programme and Indigenous Students Programme.

The Minister has released a discussion paper focussed on the future arrangements for HEEP, which also touches on future arrangements for disability funding and Indigenous funding.

The AVCC, in its response to *Our Universities: Backing Australia's Future*, stated:

“There are modest increases in funding for the Higher Education Equity Program and Students with Disabilities Program.

The AVCC is concerned that the proposed changes to the Equity Program will focus funds at universities that put particular schemes in place. This rewards particular approaches rather than allowing diversity of approach through a fair assessment of outcomes and leads to overly complex programs with extensive reporting requirements. The AVCC supports the development of a new formula for the Equity Program but is concerned that the revised arrangements may effectively dictate internal arrangements, imposing a single approach on all universities.”

The AVCC's response to the discussion paper builds on the initial response by the AVCC to focus on the following issues:

- timing for resolution of future arrangements, in particular the need for effective consideration of changes to the equity framework and the basis for the longer term allocation of HEEP funds;
- the relationship of the equity framework to HEEP;
- the proposals to update the equity framework; and
- the allocation of funding for HEEP.

The AVCC argued in *Forward from the Crossroads* that future funding arrangements should reward different aspects of university activity. The AVCC therefore recommends that HEEP funding should be focussed primarily at those universities with high level of achievement in advancing equity of student access, participation and success. This is outlined further at section 4(c) below.

## **AVCC Recommendations**

**1. The AVCC considers that the Government should:**

- **concentrate on resolving the basis for allocation of HEEP funds for 2005 by July 2004;**
- **continue discussion of the shape of the equity framework to ensure a fully informed decision is made by the end of 2004; and**
- **work with the AVCC and universities on a distribution mechanism for HEEP from 2006 that would direct funding to universities demonstrating high level achievement in equity outcomes.**

**2. HEEP should be focussed at all equity groups identified by the national framework, with each university determining the particular support programs it wishes to put in place, and for whom, consistent with the national equity framework.**

**3. The AVCC supports the retention of low SES as an equity target group.**

**4. There is widespread interest in a more refined measure of low SES students. The AVCC proposes that the option of an improved geographic measure should be worked through and resolved by the end of 2004.**

**5. The AVCC rejects tying low SES to details of parental occupation or education. This data would be hard to collect, increases the reporting burden on both students and universities, and would have limited application to students who do not enter university directly from school. This proposal has previously been rejected by DEST and should be rejected again.**

**6. The AVCC supports the continued identification of students from rural and isolated areas as an equity target group.**

**7. The AVCC supports the continued identification of students with disabilities as an equity target group.**

**8. The AVCC supports funding Regional Disability Liaison Officers from the Students with Disabilities Programme.**

**9. The AVCC supports DEST reducing the reporting load on universities from 2006 by removing the requirement to report the particular disability reported by students.**

**11. The AVCC supports the continued identification of students from non English speaking backgrounds as an equity target group.**

**12. The AVCC proposes that the option to replace the definition for NESB with Language Background Other Than English should be worked through and resolved by the end of 2004.**

**13. The AVCC supports the continued identification of Indigenous students as an equity target group.**

**14. The AVCC:**

- **supports the retention of women in engineering and architecture as equity target groups and seeks further examination of the extent to which systemic educational disadvantage remains in these fields or others; and**
- **does not support inclusion of men in nursing and teaching as an equity target group.**

**15. The AVCC does not support inclusion of either mature age or school type in the framework as new national equity target groups.**

**16. The AVCC:**

- **accepts the eligibility criteria set by the Government but argues that there should be a wide interpretation of institutional equity scholarships;**
- **restates its position that universities' scholarships that provide students with financial support should not be treated as income for the receipt of Government income support benefits;**
- **supports allocation of funding for 2005 based on the number of students from low SES, rural, isolated, and or NESB target groups; and**
- **supports development by April 2005 of a performance based mechanism for the allocation of HEEP from 2006 to recognise universities with a high level of achievement in addressing equity issues.**

## 2. Timing of resolution of future arrangements

Due to the focus on the major funding changes in *Our Universities: Backing Australia's Future* there has been only limited time for universities to consider the Government's proposals for the future structure of the equity framework and the funding available through HEEP, the Students with Disabilities Programme and the Indigenous Support Programme.

Universities have serious concerns about the proposed revision of the equity target groups that require effective consideration.

The Government is proposing a speedy resolution of outstanding issues driven by the expansion of the various programmes from 2005 and hence the need for certainty about eligibility and allocations of funding in advance of the funding year.

The AVCC agrees that universities should have a suitable lead time to prepare for new arrangements. It is also important that the precise nature of the changes should not be resolved without due consideration. In the context of the large number of changes due to begin in 2005 the AVCC believes that the changes to the equity programmes require more discussion than is possible under the proposed timing but that essential funding decisions for 2005 can be made by July 2004.

In particular it is essential to consider thoughtfully how best to structure the allocation of HEEP funds to ensure it best supports and encourages high level performance in improving the outcomes for students from the identified equity target groups.

### ***Recommendation***

**The AVCC considers that the Government should:**

- **concentrate on resolving the basis for allocation of HEEP funds for 2005 by July 2004;**
- **continue discussion of the shape of the equity framework to ensure a fully informed decision is made by the end of 2004; and**
- **work with the AVCC and universities on a distribution mechanism for HEEP from 2006 that would direct funding to universities demonstrating high level achievement in equity outcomes.**

### 3. The relationship of the equity framework to HEEP and other equity programs

The discussion paper makes clear that the Government proposes that there be an overarching guiding framework that sets out the aims of the program and the major target groups, supported by funding that can be used for all purposes consistent with the overarching framework. The basis for allocating the funding among universities would not necessarily include each equity group.

The framework would allow a university to identify additional target groups not specifically identified by the framework or which form a particular subgroup where the additional groups are a particular concern for the university.

Most, if not all, universities allocate more to equity programs than they receive from HEEP and related programs. It would be foolish to attempt to segment activity into that ‘funded’ by different sources rather than ensure that university equity programs are consistent with national objectives and local needs.

A particular concern to universities is the relationship of students with disabilities and Indigenous students to the broader HEEP program. There can be assumptions that HEEP funding should not be used for those groups (eg see page 6 of the discussion paper in relation to Indigenous students). The AVCC rejects this approach. The specific programs for some equity groups support particular services for those students. However, universities also provide more general services that are used by many students including those with a disability or who are Indigenous.

It is therefore essential that the program rules for HEEP make clear that the funding received by a university may be used to support the full range of equity activity that the university wishes to pursue consistent with their equity framework. Universities should not be restricted in how they use it to support equity objectives consistent with the national framework.

#### *Recommendation*

**HEEP should be focussed at all equity groups identified by the national framework, with each university determining the particular support programs it wishes to put in place, and for whom, consistent with the national equity framework.**

## 4. Updating the equity framework

It is important that the equity framework is updated for improvements in outcomes for target groups and hence remains targeted at the major areas of systemic educational disadvantage.

The existing equity framework consists of six target groups: low socio economic status (low SES), rural and isolated, people with disabilities, non English speaking background (NESB), Indigenous and women in particular disciplines. The discussion paper proposes dropping NESB as a category, and keeping the remaining groups, potentially with changes in definition or basis for collecting data.

The AVCC considers that the major areas of continued disadvantage relate to the impact of poverty and of Indigenous background. Other target groups reflect particular manifestations of those two major issues, including the combination of multiple types of disadvantage. It is essential that the equity framework focus on addressing these two areas.

The particular issues about each of the groups are considered below.

### *a. Low SES*

Low SES remain the major target group of the equity framework, with economic and related cultural barriers being the predominant barrier faced by prospective students in accessing university and then successfully completing their degree.

There are concerns about the identification of low SES students, a debate that is partly confused by confounding overall measures of low SES student numbers with the individual challenge universities face in identifying particular students who may need support.

The present definition of socio economic status, based on the postcode of students' permanent residence, identifies distinct groups in the community with clearly differentiated access to university for low, medium and high SES students. Within that measure it is undoubtedly true that there are individual students who are not poor from low SES regions and poorer students from high SES regions.

Approached from the perspective of identifying individual students who are low SES postcodes are only of broad use. As a result some universities collect other data relating to the individual, such as data on parental income, occupation or education, to deepen their understanding of students' backgrounds and target services accordingly.

The main options for change are:

- collecting data on student parental occupation or education. There are mixed views by universities that collect such data about how reliable and collectable the data is. As a source of information its relevance to older students is limited since it focuses solely on background and ignores present circumstances. The AVCC also remains very wary of proposals to increase the data collected and reported to Government. It has previously rejected similar proposals (which DEST chose not to pursue); and
- a more refined geographic analysis that considers more localised regions than postcode. This would improve the accuracy of the data while retaining comparability with previous

collections based on postcode. This could require universities to report student addresses to allow a more accurate assessment, which raises the issue of additional reporting but not of additional collection.

***Recommendations***

**The AVCC supports the retention of low SES as an equity target group.**

**There is widespread interest in a more refined measure of low SES students. The AVCC proposes that the option of an improved geographic measure should be worked through and resolved by the end of 2004.**

**The AVCC rejects tying low SES to details of parental occupation or education. This data would be hard to collect, increases the reporting burden on both students and universities, and would have limited application to students who do not enter university directly from school. This proposal has previously been rejected by DEST and should be rejected again.**

*b. People from rural and isolated areas*

The evidence indicates there remain systemic educational barriers to students from rural and isolated areas, although in part this is due to economic disadvantage already identified through the low SES target group.

***Recommendations***

**The AVCC supports the continued identification of students from rural and isolated areas as an equity target group.**

*c. People with disabilities*

The AVCC supports the continued identification of students with disabilities as an equity target group.

The Students with Disabilities Programme will be doubled from 2005. The discussion paper proposes that all funding directly relating to disability should come from this expanded program. This would mean that funding for Funding the Regional Disability Liaison Officers would no longer be sourced from HEEP.

The AVCC supports the transfer of responsibility for the Regional Disability Liaison Officers to the Students with Disabilities Programme. This will ensure the additional disability funding can be allocated (given in past years claims have not exceeded the available funding) and increase the funds allocated as general equity funds.

The discussion paper also proposes simplifying the question asked of students at enrolment, which serves to allow student to self-identify as having a disability, to remove identification of the type of disability.

Universities find the information of type of disability useful for planning services, while acknowledging that not all students self identify. Many universities would therefore continue to collect the data for internal purposes.

If the data is not required by Government it should not be reported by universities to DEST. Since there are already substantial changes required for 2005 data reporting, any change should not occur until 2006 reporting of enrolment data.

#### ***Recommendations***

**The AVCC supports the continued identification of students with disabilities as an equity target group.**

**The AVCC supports funding Regional Disability Liaison Officers from the Students with Disabilities Programme.**

**The AVCC supports DEST reducing the reporting load on universities from 2006 by removing the requirement to report the particular disability reported by students.**

#### *d. People from Non English Speaking Backgrounds*

People from Non English Speaking Backgrounds is the first target group whose continued inclusion as an equity target group is questioned by the discussion paper. This is based on the evidence that the level of access and participation is consistent with the size of the group in the Australian population and some concern that it is too heterogenous a group to adequately identify a disadvantaged set of potential students.

The AVCC is concerned that the analysis underlying this proposal is not sufficiently considered. It is clear that students from Non English Speaking Backgrounds cover a wide range of students, some groups of whom may not face particular levels of disadvantage due to their non English speaking background but others of whom equally do.

The data cited to show that such students are proportionally represented is difficult to interpret given the challenge of establishing a clear reference mark. Part of the issue is that the definition requires the person to have entered Australia within the past ten years such that the nature of the group changes rapidly, reflecting changes in migration and refugee patterns.

There are two options that could be taken:

- exclude NESB from the framework as a particular target but allow universities to target particular groups whom the universities identify as disadvantaged; or
- include NESB within the framework with a broader definition (perhaps the suggested Language Background Other Than English), but again leave to universities to identify the particular groups they wish to target.

Advice from universities strongly indicates that there are substantial groups of NESB students who should remain a target group due to systemic educational disadvantage while agreeing that the definition for reporting may not be fully effective. This suggests that NESB should remain a target group but with consideration of different definitions that might allow for better national monitoring.

**Recommendations**

**The AVCC supports the continued identification of students from non English speaking backgrounds as an equity target group.**

**The AVCC proposes that the option to replace the definition for NESB with Language Background Other Than English should be worked through and resolved by the end of 2004.**

*e. Indigenous people*

The discussion paper does not address indigenous students on the basis that there is a specific indigenous program with separate funding. This unfortunately reflects that Indigenous issues are handled by a separate group in DEST causing a sometimes dysfunctional split.

The paper does suggest (p6) that HEEP funds cannot be used for Indigenous students other than if they are covered by another target group (eg low SES). This contradicts the general approach that use of funding is open to all legitimate activity under the framework.

It is therefore important to restate that Indigenous people should be an equity target group under the Framework and that use of funds to support them in addition to those available through the Indigenous Support Fund is acceptable. This would parallel the case for students with disabilities.

**Recommendation**

**The AVCC supports the continued identification of Indigenous students as an equity target group.**

*f. Gender*

The equity framework includes women in non traditional areas, specifically engineering and architecture in recent years. Reduction of systemic educational disadvantage for women in particular disciplines has been an area of significant progress since the equity target groups were identified, with the set targets met in most cases.

With the improvement in participation by women in most of the identified discipline areas there is evidence that the degree of systemic education disadvantage in those fields has reduced. The evidence is weaker for the fields of engineering and architecture.

It would therefore be useful to consider more carefully the extent to which systemic educational disadvantage remains for access to those disciplines or others about which there are concerns. This should involve going below the participation indicators to understand more fully the reasons for any imbalance.

The discussion paper also raises the question of whether to include males in nursing and teaching within the framework. This question has received much public attention following release of the discussion paper and the associated DEST research report. That public debate has been in the context of males being 'disadvantaged'.

The discussion paper does not refer to disadvantage but asks whether gender equity in specific labour markets is a legitimate focus for HEEP. It does not propose an answer (in contrast to many other sections of the paper).

The argument for inclusion of men in nursing and teaching is primarily based on under representation with no evidence of systemic disadvantage due to being a man causing the under representation. The AVCC is strongly of the view that gender imbalance not associated with systemic education disadvantage should not be a part of the equity framework.

***Recommendation***

**The AVCC:**

- **supports the retention of women in engineering and architecture as equity target groups and seeks further examination of the extent to which systemic educational disadvantage remains in these fields or others; and**
- **does not support inclusion of men in nursing and teaching as an equity target group.**

*g. Other groups*

The discussion paper raises two other possible groups or measures: ‘school attended’ and mature age students.

‘school attended’ is not a target group but indicates a potential way to distinguish an under represented group. The target group would be public school students who are less likely than catholic school students and other private school students to progress to university study, particularly to some universities. As a category it would overlap with low SES, especially in intent, and require new data collections.

Mature age is raised as an option if the low SES definition were changed to focus on parental background which would tend to be of less direct relevance to older students. As a group mature age would cover a heterogenous group, a significant portion of whom would not constitute disadvantaged students.

In both cases where particular universities considered either group to be a particular concern for their region or target students then they could identify the group as a university equity target group.

On balance there is little to gain from the inclusion of either group as a formal target group for all universities.

***Recommendation***

**The AVCC does not support inclusion of either mature age or school type in the framework as new national equity target groups.**

## 5. HEEP funding arrangements

The discussion paper does not directly address the question of the aim of HEEP and how it is to support the Government's equity objectives. This question is central to developing a long term allocation mechanism for the program.

The existing HEEP funding allocation method is set out at page 20-21 of the discussion paper. In essence each university receives a base grant of \$80,000 with remaining funds distributed based on numbers of students who are low SES (40%), rural or isolated (30%), with disabilities (15%), NESB (7.5%) and women in engineering and architecture (7.5%), with the student numbers for each university adjusted to reflect success (units passed) and retention (return the following year) factors.

The discussion paper proposes a substantial change to how funds are allocated:

- each university must meet base eligibility criteria to receive any funding;
- eligible universities then receive funding based on enrolment of students who are low SES or from rural and isolated areas, with no adjustments for success or retention.

The changes will apply to the expanded program. With the additional \$4.5m a year and responsibility for funding the disability liaison officers moved under the disability program, there is close to double the funds to be distributed.

The overall assumption implicit in the discussion paper is that funding should largely follow the relative enrolment of students from the national equity target groups.

The AVCC challenges this assumption and proposes that the Government work to develop with universities and the AVCC a performance based assessment that rewards universities for a high level of achievement in advancing equity of student access, participation and success. This could not be developed in the short term. Instead the AVCC proposes that:

- the Government finalise the eligibility criteria for the program by July 2004 (see (a) below);
- the Government finalise an allocation mechanism for 2005 funding by July 2004 based on an allocation by equity student enrolments (see (b) below); and
- develop a true performance based allocation mechanism over 2004 and confirm all details by April 2005 to apply to funding from 2006 (see (c) below).

### *a. The eligibility criteria*

The concept of eligibility criteria for programs is one that the Government has used in a number of places in *Our Universities: Backing Australia's Future* (eg the Learning and Teaching Performance Fund). Those criteria have been set out in the Government's statement and represent Government policy.

The criteria for HEEP are that the university has outreach programs and support services, offer Commonwealth Learning Scholarships, and offer institutional equity scholarships.

The use of such criteria was questioned by the AVCC in its response to the Government's package since they tend to promote particular approaches to improving equity rather than allowing universities to decide on the best approaches. However, the particular criteria set down are unexceptionable.

The one issue is that some institutions may prefer ways to provide financial support to students that extend beyond the traditional concept of scholarships. To cater for this DEST should articulate a wide definition of institutional scholarships to ensure they do not cut off innovative ways to provide financial support to students.

The AVCC is also concerned that the Government reduces students' income support payments where students receive scholarships from universities. Since the Government is to require universities to offer such scholarships it should not be financially advantaged by universities doing so.

*b. The distribution formula for 2005*

The discussion paper proposes to distribute funds based on enrolments of low SES and rural and isolated students only. These groups represent the largest equity groups and are 70% of the present formula. It proposes to use enrolment only (whether commencing or total) and not adjust for success or retention.

A focus on the two largest equity target groups is a useful way to allocate funds in a fairly straightforward way that avoids a complex calculation that few can understand. With other funding targeting Indigenous students and students with disabilities and the proposed removal of gender target groups the major concern with this proposal is the exclusion of NESB students. The result tends to overweight towards rural students, many of whom are also low SES.

The AVCC argues above that NESB, possibly modified, should remain an equity target group. They should therefore remain part of the funding allocation for 2005.

The discussion paper argues for removal of a retention and success adjustment in response to the evidence that the major weakness for the target groups is enrolment not completion of studies subsequently. However, the inclusion of success and retention has potentially been important to encouraging universities to focus on support for students once enrolled not just enrolling them.

Use of participation (total enrolments) would reflect that students have re-enrolled in subsequent years but does risk under emphasising the importance of successful education of equity students not just enrolment.

In the context of finding a short term allocation mechanism based on student numbers the AVCC proposes that funding for 2005 be allocated based on the number of students from low SES, rural, isolated, and NESB target groups.

*c. A real performance allocation mechanism*

In *Forward from the Crossroads* the AVCC argued that university funding should encourage a diverse university sector and provide a range of funding options for universities to target consistent with their particular missions. The Government's response took up elements of

this approach through creating some program elements that rewards achievements in particular aspects of university activity with a focus on funding those universities with high level achievement in those aspects.

The Learning and Teaching Performance Fund is an example of such a program element, one created to provide a balance to the various performance driven research funding schemes.

The AVCC considers that the equity program should take a similar approach to distribution of funding. Just as all universities will continue to focus on learning and teaching regardless of whether they receive funds from the Learning and Teaching Fund, so too equity is an integral part of all universities with funding from university core grants as well as from HEEP and the other equity programs.

However, where universities show particular strengths in addressing equity issues it is suitable that they receive the bulk of the available funding to support that activity and recognise their achievement.

It is not possible to develop such a system in the short term. It needs proper development through further discussion with universities and the AVCC over the course of 2004, with a final mechanism agreed by April 2005. This would then apply to 2006 funding, with any necessary transition arrangements.

One issue with such an approach is to ensure that all universities continue to report on equity activity against the broad performance indicators of access, participation, success and retention. This would be required through the Institutional Assessment Framework that DEST has developed which includes equity as one area for assessment. Reporting of relevant information would be provided through university submissions for HEEP funding within the proposed performance approach.

***Recommendation***

**The AVCC:**

- **accepts the eligibility criteria set by the Government but argues that there should be a wide interpretation of institutional equity scholarships;**
- **restates its position that universities' scholarships that provide students with financial support should not be treated as income for the receipt of Government income support benefits;**
- **supports allocation of funding for 2005 based on the number of students from low SES, rural, isolated, and or NESB target groups; and**
- **supports development by April 2005 of a performance based mechanism for the allocation of HEEP from 2006 to recognise universities with a high level of achievement in addressing equity issues.**