

SUBMISSION ON DISCUSSION PAPER ON IMPLEMENTATION OF REGIONAL STUDY HUBS INITIATIVE

26 March 2018

Universities Australia is pleased to provide this submission to the Department of Education and Training on the implementation of the Government's Regional Study Hubs Initiative. Universities Australia sees this initiative as a useful tool to increase the number of students studying in under-serviced areas of Australia. Regional and remote students are underrepresented in higher education, and initiatives that serve to increase their numbers are welcome.

The discussion paper's points on the proposed selection criteria are generally well-reasoned and sensible. However, Universities Australia wishes to make the following comments and pose some questions.

TIMING

Universities Australia is concerned that the indicated timeframe for universities and other providers to lodge their applications (29 March through to 30 April) is too short. Less than five weeks is very little time to identify and approach potential staff, locate suitable venues and especially to identify and negotiate potential third-party contributors, and craft the required formal feasibility study.

We note that this period of time also includes a number of public holiday periods, most importantly Easter.

It is Universities Australia's view that this short time frame will provide an advantage to providers seeking support for established regional study hubs, and disadvantage providers who wish to establish new centres.

If the government's main intention is to expand service delivery to more students and locations, we recommend a longer period be given for providers to craft and lodge their applications.

Universities Australia is also concerned at the turn-around time of less than a week between comments being received on this discussion paper and the expected call for applications. We are not convinced that all feedback received can be absorbed and necessary changes made and approved through the departmental processes in this time.

REQUIREMENT FOR THIRD PARTY CONTRIBUTION

Universities Australia agrees that obtaining a third-party commitment will demonstrate community engagement with, and support for, a study hub. However, we argue that it may be difficult to obtain financial or in-kind support from smaller and less well off communities which would most benefit from having a study hub.

Third party support should not be a threshold issue, and providers who offer to fully fund a study hub should not be excluded from consideration. A letter of recommendation from community

leaders should be enough to back an application, especially given the very tight timelines involved.

FUNDING FOR PLACES

The MYEFO Commonwealth Grant Scheme (CGS) funding freeze is expected to reduce the ability of underrepresented groups, including regional and remote students, to access university places. It makes it particularly hard for regional universities to offer places in areas of high demand.

This places the MYEFO changes in conflict with the policy intent of the regional study hub initiative. It may also make it more difficult to obtain formal financial or in-kind community support. A number of Universities Australia's members have indicated that they would not be interested in applying to run a regional study hub without additional incentives, given the addition of financial pressures imposed by the funding freeze.

While broadly supportive of the regional hubs initiative, Universities Australia maintains its stated position that the best way to increase regional student participation would be to lift the CGS funding freeze altogether and return to the demand driven system.

TYPES OF SUPPORTED PLACES

The selection criteria for the applications would benefit from a statement about the types of qualification (if any) that are expected to be supported at the study hubs. For instance, are the hubs expected to support students at all levels, up to PhD, or is there a focus on undergraduate or enabling courses?

REQUIREMENTS FOR COURSE DELIVERY

Similarly, the selection criteria should include any information about the Government's preferences for course delivery at or through the study hub. For instance, would a provider that offers to supply visiting lecturers and tutors on site have an advantage over an applicant that proposes the study hub would be a digital and distance learning centre only? The expectation from the information in the discussion paper seems to indicate study hubs will support distance learning, but it is not entirely clear.

INCONSISTENCY IN FUNDING APPROACH

There is also some apparent inconsistency regarding funding. Most importantly, we note that funding could be provided in Stage 1 (Establishment) for items that may not be covered in Stage 2 (Ongoing Assistance). Most importantly, the physical fit-out of the hub would be supported in Stage 1, but would be supported in Stage 2 only "in some circumstances", where these circumstances are not stated.

Universities Australia recommends that the wording in this section be clarified to ensure that applicants have a better understanding of their options for the use of the funding.

PERFORMANCE AND REPORTING

The discussion paper states that the hubs "will be required to report annually on performance".

Universities Australia recommends that this statement be expanded to indicate the measures expected to be included in these annual reports and that due regard be paid to administrative workloads.

Recommendations

Universities Australia makes the following recommendations.

- That applicants be given more than five weeks to provide their applications.
- That some flexibility be given to what constitutes “third party support” in cases where the provider offers to fully fund the study hub.
- That the call for applications provide greater details on the following matters:
 - preferences for the level of students attending the study hub;
 - expectations or requirements for the educational support to be offered through the study hub;
 - more detail on how the study hub funding can be used and what it can support; and
 - the measures expected to be included in the annual performance reports.