

**Professor Arshad Omari**  
**Interim Vice-Chancellor**



29 August 2024

JOONDALUP CAMPUS

270 Joondalup Drive, Joondalup  
Western Australia 6027  
☎ 134 328

Senate Education and Employment Legislation Committee  
By email to: [eec.sen@aph.gov.au](mailto:eec.sen@aph.gov.au)

[www.ecu.edu.au](http://www.ecu.edu.au)

ABN 54 361 485 361 CRICOS IPC 00279B

## **Inquiry into the Universities Accord (Student Support and Other Measures) Bill 2024**

### **Submission from Edith Cowan University**

Edith Cowan University (ECU) welcomes the opportunity to provide a submission to the Senate Education and Employment Legislation Committee's inquiry into the provisions of the Universities Accord (Student Support and Other Measures) Bill 2024.

ECU is a large public university committed to providing educational opportunities for under-represented groups, and with significant teaching programs in Teacher Education, Nursing and Social Work. ECU has well-established, and highly regarded enabling course programs, and a strong focus on work-integrated learning in the curriculum.

This submission relates to the provisions of Schedule 3 and Schedule 4 of the Bill only.

#### **Schedule 3: FEE-FREE Uni Ready courses**

The Bill provides *only* for the *establishment* of FEE-FREE Uni Ready courses in 2025, by replacing references to 'enabling courses' and setting a funding cluster rate.

Further changes to the *Higher Education Support Act* will be required to address other matters, such as the structure, delivery, and eligibility requirements of the FEE-FREE Uni Ready courses, and the possible inclusion of these courses in the Australian Qualifications Framework. These changes will be required to meet the Australian Government commitment to:

*"... work with providers to professionalise and increase the quality and consistency... [of these courses, and] ... portability of credentials for students."*

The Bill schedule is therefore indicative of the piece-meal and hurried approach to implementation of some Australian Universities Accord recommendations by the Australian Government Department of Education.

**ECU recommends** that this schedule of the Bill is deferred so that consultation with higher education providers can inform the development of a comprehensive Bill with all legislative requirements necessary for the success of the FEE-FREE Uni Ready courses program.

#### **Schedule 4: Commonwealth Prac Payments**

The Bill provides for grants to be made to universities, with the intention that universities will undertake means-testing and make payments on a *weekly* basis. As such, this legislation:

- will result in considerable additional administration costs to universities

- will require the Australian Government Department of Education to establish a grant estimating and grant acquittal process, with associated regulatory burdens on both universities and the Department
- introduces inconsistency in the approach to Commonwealth Prac Payments, as payments to vocational education and training students will be made by the Department of Employment and Workplace Relations, rather than the course providers.

Universities do not have the administration systems or access to data necessary to undertake means-testing in an effective way. This is a clear example of cost-shifting to universities and is inconsistent with the data sharing and interoperability intent of the Australian Government's own Data and Digital Government Strategy.

Further, under such an arrangement, the amounts payable to universities to meet the administration costs incurred, are not referenced in the Bill schedule.

**ECU recommends** that the Bill schedule is amended to require means-testing assessments and payments to students to be made by appropriate Government agencies.

The Bill schedule *does not* provide for the legislation to include a definition of an eligible practicum (e.g. duration, attendance mode, study load), the details of eligibility for receipt of payments (e.g. financial circumstances, location from home, consequences of fail/ withdrawal), or the priority area courses. Presumably these details will be set down in the Other Grant Guidelines, and therefore will be determined at the Minister for Education's discretion.

Commonwealth Prac Payments as proposed, will have limited impact as a measure to ease students' cost-of-living pressures. Only a small percentage of students undertaking practicums will be eligible for support, because:

- the means-testing requirements will exclude students who are not benefit recipients, but who nonetheless lose income, or incur additional costs, in attending practicums
- the application only to mandatory placements undertaken in teaching, nursing and midwifery, and social work courses, will disregard other priority discipline areas, such as psychology, counselling and paramedicine.

**ECU recommends** that details relating to the definition of practicums, student eligibility, and course applicability are included in legislation, to allow proper consideration by the Australian Parliament and legislate for a broader Commonwealth Prac Payments with better reach and impact.

If you have any queries relating to the content of this response, please contact me by email or by telephone (08) 6304 2526.

Yours//sincerely,

Professor Arshad Omari  
Interim Vice-Chancellor