UNIVERSITY
OF WOLLONGONG
AUSTRALIA

8 August 2024

The Hon Jason Clare MP
Minister for Education
GPO Box 9880
CANBERRA ACT 2601

Dear Minister

The University of Wollongong (UOW) welcomes the opportunity to provide feedback on the Australian Government's Higher Education policy agenda. This submission outlines UOW's position on the recently released consultation papers relating to the Managed Growth Funding System and Needs-Based Funding System.

In 2025, UOW will celebrate 50 years of delivering quality higher education to the communities served by our campus footprint – particularly the Illawarra, South West Sydney and the South Coast of NSW. During this time, UOW has grown to become a leading regional university, with a reputation for quality teaching and globally recognised research, as demonstrated by our ranking among the top one per cent of universities worldwide. Our foresight in developing and consistently supporting a domestic campus network across NSW has also enabled UOW to deliver participation and attainment outcomes for cohorts traditionally underrepresented at university.

For these reasons, we firmly believe we are well placed to deliver on the Australian Government's higher education reform agenda, as outlined in the Universities Accord. If the government and the sector are to realise the intentions of the Accord, universities like UOW must be supported to leverage their strengths in delivering equity and access outcomes. UOW also encourages the government to use this reform agenda to reiterate the importance of regional universities to the economic and social fabric of their communities.

UOW's strengths align well with government priorities

UOW is proud of our role in the sector when it comes to driving equity and access outcomes for students. Around 40 per cent of our students come from backgrounds underrepresented in higher education and we have a long and proud history of working closely with our communities to drive increased participation and attainment. We believe we are well-placed to deliver on the government's Needs-Based Funding policy agenda in this regard, with a particular focus on supporting increased participation and attainment for students from backgrounds underrepresented in higher education. We believe this should be closely aligned with the skill needs of the communities in which universities are embedded and which they support.

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For example, for over 60 years, and even before the University gained its autonomy in 1975, UOW has been a cornerstone in producing skilled workers required for the Illawarra and its surrounds. Initially focused on engineering, UOW has expanded our offerings to now deliver high-quality graduates in education, the thriving healthcare sector and other growing sectors.

We are a regional university driving social and economic progress

UOW's regional campus network places us at the centre of the communities we serve. We have nine domestic campuses, spanning the Illawarra, Shoalhaven, Eurobodalla, Bega Valley, Southern Highlands, Sutherland Shire, South West Sydney and the Sydney CBD. The government must prioritise support for universities such as UOW that operate regional campuses. It is no secret that education and research in these regions are costly but deliver significant economic and social impact in communities. UOW already operates in several regional communities with high disadvantage indicators (such as Shoalhaven and Liverpool), according to the Socio-Economic Indexes for Area (SEIFA) and can play a leading role in meeting the government's objectives when it comes to needs-based funding.

Flexibility will be crucial to the effective implementation of new policy settings

UOW encourages the government to deliver policy settings and frameworks that promote flexibility, certainty and simplicity wherever possible. We recognise that every university and every community is different, and this requires a flexible and adaptable approach by government. With that in mind, we want to work closely with the government and the Australian Tertiary Education Commission to highlight the importance of needs-based funding for UOW's student cohort, particularly at our regional campuses where equity students make up a significant proportion of total enrolments. We also encourage the government to consider including culturally and linguistically diverse communities in needs-based funding, particularly in communities like South West Sydney, which are seeing an increasing and aspirational population, providing a significant opportunity to deliver increased university participation.

Our goal is to achieve measured, modest growth in the communities we serve

UOW supports the government's intention to deliver managed growth for universities but cautions against any policy settings that would result in UOW being financially disadvantaged. UOW is a critical local economic driver in the communities we serve (most notably the Illawarra region), and any unintended consequences of government policy would have detrimental impacts on our communities.

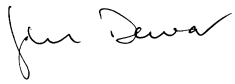
UOW is responding to the impact of changes to the government's Migration Strategy and its planned approach as outlined by the International Education and Skills Strategic Framework. We have been compelled to undertake a comprehensive review to ensure the University's financial sustainability in light of recent impacts resulting from government decisions. Flexibility and certainty in government funding moving forward will be critical so that UOW can achieve modest and sustainable growth in the communities we already operate.

Our submission presents sensible solutions that balance the requirements of government and universities and will help ensure that UOW, and the sector more generally, can secure a sustainable and impactful future. The data and information provided in this submission provides an insight into UOW's capabilities and expertise, as well as our track record when it comes to boosting participation and attainment outcomes for underrepresented groups.

We look forward to the opportunity to work closely with government and the Australian Tertiary Education Commission to align expectations and objectives so that UOW continues to play a critical role in the economic and social fabric of our communities.

We would welcome the opportunity to discuss further. If you require any further information, please contact UOW Director, Government and Community Relations Canio Fierravanti – caniof@uow.edu.au or 0411 244491.

Yours sincerely



Professor John Dewar AO
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KEY RECOMMENDATIONS

1. Clarification of 'catchments' for institutions

Catchment areas need to be clearly defined to ensure a fair distribution of resources and opportunities, thereby preserving the role local providers play for their communities. Clarification is also needed on how catchments will be implemented, including how they might overlap between institutions. This is essential to ensure fairness and avoid competitive disadvantages for universities with intersecting catchments. Consideration needs to be given to treatment of an institution's multi-campus footprint and the role of online provision in meeting the policy objectives.

2. Approach to funding provision

UOW advocates for a funding approach that embodies certainty and simplicity to better support both students and institutions, and which balances flexibility and accountability. Allocating funds early and over a multi-year period will enable universities to plan effectively, measure the success of growth initiatives, and make informed decisions on resource allocation and program development for student success. This approach will enhance the ability of all universities to address local educational needs and promote long-term success.

We suggest a funding envelope that provides for:

- Baseline 'managed growth' that provides a funding floor together with a target growth band across the funding period to provide an alternative to hard caps which are likely to be effortful to manage and risk stifling responsiveness and innovation.
- A 'needs based' component which institutions can tailor to meet the needs of their equity cohorts, and which carries expectations to build aspiration and academic preparation in future students while also supporting current students to successful completion.
- A regional loading for each regional campus which considers the nature of that community, for example, in terms of socio-economic advantage, drawing population, workforce needs and remoteness.

We acknowledge the government's expectations that institutions demonstrate the funding is expended effectively for the purposes provided and suggest that this be implemented in ways that avoid administrative burdens of complex reporting.

Additionally, there must be a dedicated infrastructure funding pool and increased transparency in research funding to ensure that universities can effectively balance teaching and research priorities. As suggested in our ATEC submission, the Commission should develop a long-term strategy with bipartisan support to enhance sector-wide capabilities.

3. Clear transition arrangements

We suggest a transition approach will be needed to move from the current approach to a new model. This is particularly important given that the university sector will face a period of low domestic demand in the near term and that the necessary increases in participation required to achieve the ambitions of the Accord will require time and effort to build. At the same time, changes to international student education have reduced funds available for institutions to invest in initiatives and infrastructure. It is critical that the transition to the new model is equitable, sustainable and enhances the ability of universities to serve their communities effectively.

4. Greater nuance in defining equity groups

In defining equity groups, UOW proposes identifying "priority learners" to better address systemic barriers to higher education. This would encompass Aboriginal and Torres Strait Islander peoples, those from low-income families or experiencing financial hardship, and students from regional and rural areas. And extend to a broader group of individuals also underrepresented in higher education including first-generation university students, individuals who are racially, culturally or linguistically diverse, those from remote areas, those who have experience of out-of-home care, and those with caring responsibilities. Consideration should also be given to members of communities who have experienced discrimination, those who have experienced disrupted education through displacement or trauma, and women in non-traditional fields. We note that students with disabilities and chronic medical conditions will be considered separately.

Contribution amounts must consider cumulative disadvantage, where a student belongs to multiple equity groups, to ensure resources are allocated accordingly. The significant role of academic preparedness in student outcomes should be acknowledged, but it is important to recognise that multiple models exist, such as embedding preparedness within programs, pre-provider preparation, and VET pathways.

A key consideration is that funding be based on headcount rather than Equivalent Full-Time Student Load (EFTSL). Support is needed for students irrespective of the number of subjects they undertake, making headcount a more appropriate metric for funding allocations.

5. Ensuring a streamlined experience for equity students

The approach to guaranteeing a university place for an equity student needs careful design to ensure that unintended barriers are not placed in their way.

A means must be provided for individuals to be assessed and verified without needing to disclose personal information at multiple times to multiple different parties. Government agencies may be able to support this process with eligibility being recorded as a unique identifier which can be shared when applying and enrolling. This information could also be used to simplify reporting.

Equity students will need to be supported to access a guaranteed place by ensuring that there is sufficient flexibility to allow a student to choose their preference from a range of course offers for which they are eligible and study modes and locations that will be most supportive for their circumstances. Consideration needs to be given to how this can be managed within a capped system to avoid perverse outcomes that could deter equity students from study. A range of possibilities could be explored, for example:

- ATAR or admissions adjustments
- Prioritisation or quotas
- Allowing a greater number of preferences
- Demand driven places at local universities.

Processes must meet the needs of school leavers and non-school leavers and accommodate applications through tertiary admissions centres and direct applications including alternate pathways. A national system for managing equity places may be necessary to ensure timely offers.

BACKGROUND

The University of Wollongong (UOW) is a regional university that serves as a key driver of economic and social development in our communities. With a focus on meeting local and national skills needs, UOW has a proven track record in attracting and supporting equity students. Over 40% of our students come from backgrounds typically underrepresented in higher education, with a similar percentage being the first in their families to attend university.

Through tailored local on-campus support programs and targeted outreach initiatives, UOW provides an inclusive environment that widens access and participation and supports equity students to succeed academically and beyond. Our comprehensive approach to higher education ensures that we meet the needs of diverse student populations while driving regional development.

UOW demonstrates high completion rates for equity groups and strong conversion rates for regional school leavers. Our nine campuses throughout NSW provide innovative and tailored support, fostering an inclusive environment for students from diverse backgrounds. Our NSW campuses span the Illawarra (Wollongong), Shoalhaven (Nowra), South Coast (Bega Valley), Southern Highlands (Moss Vale) and Eurobodalla (Batemans Bay). UOW also has three campuses in Sydney – Sutherland, Liverpool and Sydney CBD.

Our campuses enhance community engagement, social inclusion and participation by ensuring personalised access and pathways to higher education. This commitment to diversity and inclusion is evident in our enrolment rates, which outperform sector totals for regional and remote students, low socioeconomic students and First Nations students *(See Table 2 below).* By allowing students to live, study, and work close to home, our extensive regional campus network produces industry-ready graduates who contribute to the economic growth and development of their communities while also meeting national industry demands. UOW has maintained a relatively consistent number of commencements from regional catchments over the past three years, demonstrating our ongoing appeal and relevance to regional students.

High equity group completion rates: UOW's commitment to equity is highlighted by our high completion rates for equity groups across our campuses. In 2022, our Bega, Eurobodalla, and Southern Highlands campuses achieved a 100% completion rate, while Shoalhaven and Wollongong had completion rates of 90.7% and 64.6% respectively. Moreover, UOW consistently outperforms Table A institutions in success rates for domestic students from underrepresented groups, with an 89.55% success rate for regional students and 93.48% for remote students in 2022. ***(See Attachment 1).*** In 2023, 27.29% of our graduates were from regional or remote areas, 42.9% were the first in their families to attend university, and 14.27% came from low socioeconomic backgrounds, reflecting our strong focus on supporting diverse and underrepresented students.

Table 1: UOW completions of underrepresented groups as a proportion of total completions

	2019	2020	2021	2022	2023
Disability	12.73%	10.90%	10.88%	10.24%	8.45%
First Nations	2.43%	2.64%	2.74%	2.73%	3.22%
Regional/remote	29.16%	27.49%	27.65%	27.45%	27.29%
Low SES	14.51%	13.38%	13.70%	14.68%	14.27%
First in family	42.13%	43.65%	42.72%	44.00%	42.90%

Enrolment and support of underrepresented groups: Our commitment to equity is evident in our enrolment rates of regional and remote students, low socioeconomic students and First Nations students, which exceeds sector averages.

Table 2: Enrolments of underrepresented groups as a proportion of total enrolments 2022 – UOW vs sector

	UOW TOTAL	SECTOR TOTAL
Regional and remote	33.42%	25.75%
Low socioeconomic	18.05%	15.36%
First Nations	3.17%	2.14%
Disability	10.34%	10.92%
Non-English speaking background	1.74%	3.42%

Consistent commencements from regional catchments: UOW has maintained a relatively consistent number of commencements from our Southern NSW regional catchments over the past three years, demonstrating our ongoing appeal and relevance to regional students. Our performance in the regional and remote school leaver market is notable, with UOW being the most preferred institution in Kiama, Shoalhaven, and Wollondilly, and the second most preferred in Eurobodalla, Far West, and Murray during the 2024 UAC cycle. UOW successfully recruits a large proportion of school-leaver university applicants in regional areas. In 2024, 44.3% of known school leaver applicants from Kiama chose to enrol at UOW, while 54.5% and 61.2% of applicants from Wollongong and Shellharbour, respectively, also enrolled at UOW as commencers.

Support for students: Students at our regional campuses have access to dedicated learning development staff, student support and disability advisors, student counsellors and careers consultants to support students, most of whom are from underrepresented backgrounds. The Woolyungah Indigenous Centre (WIC) at UOW provides programs and facilities that encourage and support First Nations people from entry to university through to successful completion. UOW's Student Accessibility and Inclusion team offers personalised assistance for UOW students living with a disability and our Student Success Team tracks and evaluates the progress of equity students. The diversity in student age profiles underscores UOW's role in catering to a broad range of educational needs and life stages.

Recognising diverse student backgrounds and simplifying application processes

Current assumptions do not recognise that not all equity students transition directly from high school to university. At UOW, equity students come from diverse backgrounds, including mature-age students and those entering via non-traditional pathways. Our data shows notable increases in the older age brackets and consistent participation from younger students. This diversity in student age profiles underscores UOW's role in catering to a broad range of educational needs and life stages. Students aged 20-29 have consistently made up a significant portion of commencers, with percentages ranging from 24.25% to 27.93%. There is a noticeable rise in the proportion of students aged 40-49, from 4.95% in 2019 to 8.70% in 2023. This increase indicates a growing recognition of the value of education among older adults and a desire to engage in lifelong learning.

Table 3: Age profile of UOW commencers over the past five years:

AGE RANGE	2019	2020	2021	2022	2023
19 and under	57.22%	53.66%	63.70%	55.39%	52.11%
20-29	24.25%	27.93%	27.88%	24.51%	24.37%
30-39	7.01%	10.83%	9.03%	9.52%	10.74%
40-49	4.95%	7.62%	5.89%	6.50%	8.70%
50-59	2.18%	3.19%	2.20%	2.04%	3.49%
60-69	0.40%	0.45%	0.26%	0.49%	0.54%
70+	0.05%	0.12%	0.07%	0.12%	0.05%

UOW promotes social, cultural, environmental, and economic advancement within our regional communities. UOW's key areas of impact in our communities extend across economic development, research and innovation, workforce development and education, community engagement, and health and wellbeing. ***(See Attachment 2).***

ATTACHMENT 1

Table: Equity success rates for domestic students at UOW and Table A institutions, 2022
Non-English speaking background

	2018	2019	2020	2021	2022
UOW	86.9	87.3	88.72	87.43	87.02
Table A	86.73	88.4	88.04	87.32	87.36

Disability

	2018	2019	2020	2021	2022
UOW	87.77	88.16	87.83	85.86	84.02
Table A	82.35	82.26	82.35	80.76	81.19

First Nations

	2018	2019	2020	2021	2022
UOW	84.63	87.3	85.34	83.42	82.68
Table A	74.14	74.53	74.66	74.37	75.29

Low socioeconomic

	2018	2019	2020	2021 (SEIFA)	2022
UOW	88.49	88.47	87.75	89.55	87.28
Table A	82.87	82.94	83.8	83.47	82.55

Regional

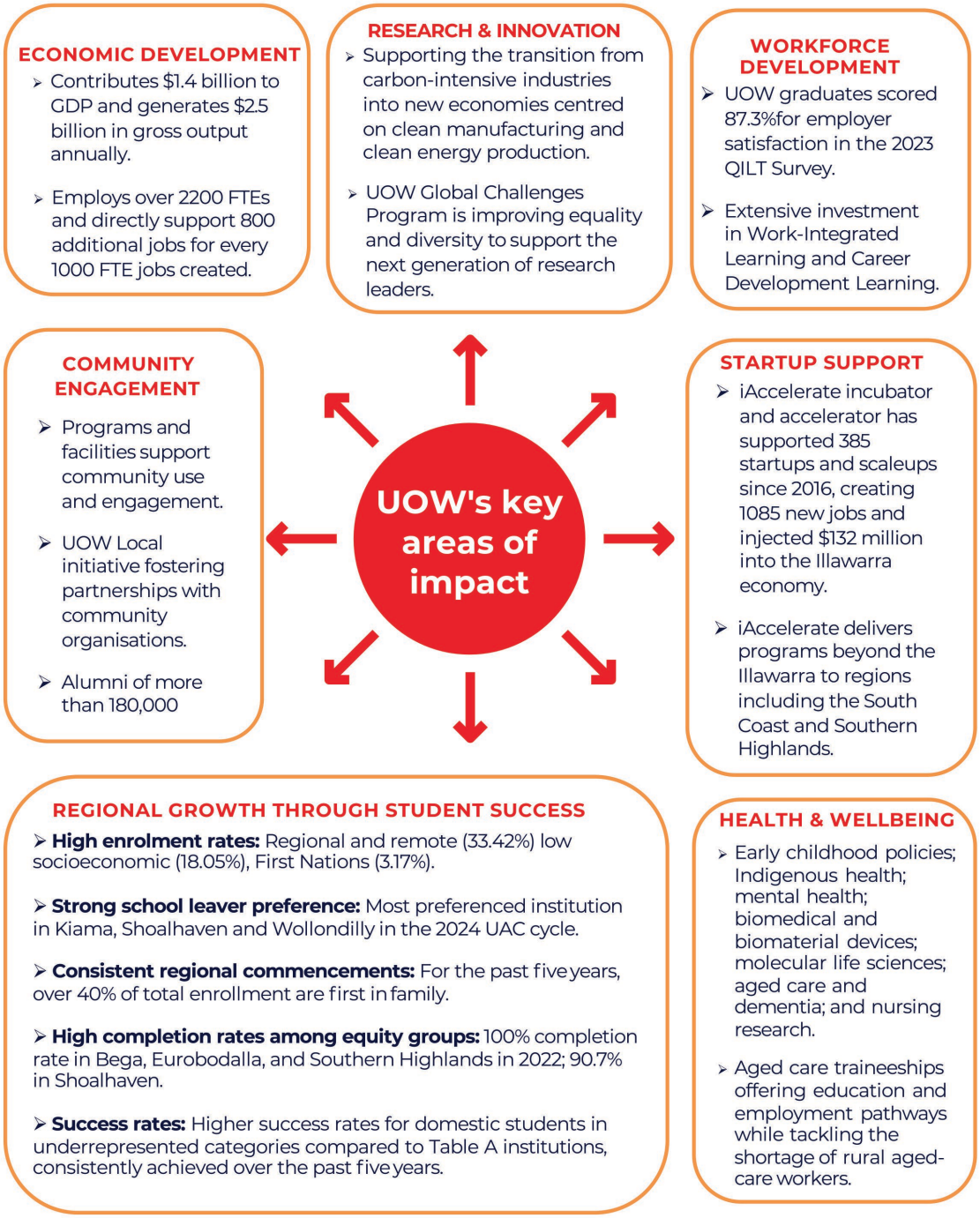
	2018	2019	2020	2021 (ASGS)	2022
UOW	91.53	91.32	91.09	90.95	89.55
Table A	86.18	86.3	86.47	85.4	85.66

Remote

	2018	2019	2020	2021 (ASGS)	2022
UOW	91.38	91.83	90.27	91.7	93.48
Table A	82.3	82.4	82.54	81.61	82.43

(a) Data includes students studying at all award course levels unless undergraduate is specified.
(b) For Socio-Economic Status measures and regional classification measures, breaks in time series occur due to the use of updated Australian Census data in 2011, 2016 and 2021. For comparison purposes, where relevant, 2011 data has been reported using both the 2006 and 2011 Census reference data. Similarly, 2016 data has been reported using both the 2011 and 2016 Census reference data and 2021 data has been reported using both the 2016 and 2021 Census reference data.

Source: https://www.education.gov.au/higher-education-statistics/resources/2022-section-16-equity-performance-data

ATTACHMENT 2

UOW's pivotal role in supporting regional communities