



**TAFE  
DIRECTORS  
AUSTRALIA**

## **SUBMISSION**

Department of Education

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# **AUSTRALIAN UNIVERSITIES ACCORD INTERIM REPORT**

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1 September 2023

### **About TAFE Directors Australia (TDA)**

[TAFE Directors Australia \(TDA\)](#) is the national peak body that represents Australia's network of state and territory publicly owned Technical and Further Education (TAFE) institutes and dual sector universities. All TDA members are complex, large education entities ranging in size from TAFE NSW with over 400,000 enrolments, to regional TAFEs in Western Australia and Victoria with about 10,000 enrolments per year. While the primary business of TDA members is vocational education and training, over half of TDA members also deliver higher education. This can be as part of a dual sector university, through third party arrangements, or their own qualifications. This means that some TDA members are regulated by TEQSA, ASQA, and if they are in Victoria, by the Victorian Registration and Qualifications Authority, or in Western Australia by the Training Accreditation Council.

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## **TDA Response to Universities Accord Interim Report**

TAFE Directors Australia (TDA) thanks the Panel for the opportunity to comment on the Australian Universities Accord Interim Report (Interim Report).

### **Executive summary**

The Accord proposes pivotal policy directions for Australian tertiary education. There could be a missed opportunity if TAFE, with its priority on quality teaching and learning, its focus on broad AQF levels including higher education (HE), and its significant regional footprint, is not integral to the proposed expansion of HE. TAFE provides genuine student choice and quality outcomes. TDA's three big reflections on the Interim Report emphasise the importance of equity; industry collaboration and innovation; and alignment.

#### **Equity**

TDA welcomes efforts to increase enrolments of equity groups in HE, while recognising that many of these students may be more suited to TAFE and TAFE dual sector organisations. Access to Commonwealth Supported Places (CSPs) would support greater equity if extended to any TAFE HE qualification.

#### **Industry collaboration and innovation**

TAFEs have a unique role in working with industry. Increased collaboration and innovation between industry and tertiary education will spread successful TAFE methodologies, assisting industry to see the value of investing more fully. New nationally networked TAFE Centres of Excellence for strategically important industries will enable partnerships between TAFE, universities, and industry.

The facilitation of innovation requires greater flexibility in the design and funding of a broader variety of qualifications and courses. The ability of TAFEs to self-accredit will allow creativity in finding skilling solutions for industry.

#### **Alignment**

Greater parity of esteem and alignment, from a system perspective as well as the student and industry view, between TAFE and HE is essential. TAFE cannot achieve that parity of esteem if it does not have the same levers as universities and integral to that is the ability to self-accredit. Bringing TAFE and universities into a single regulatory environment of TEQSA will also enable that alignment.

The suggested Tertiary Education Commission (TEC) will create a focused effort towards greater alignment, but only if TAFE is included fully in its scope from the outset. TEC must be able to fund innovative pilots which incentivise alignment.

Efforts towards greater regional and remote presence for tertiary facilities, should build on the existing footprint and community brand of TAFE.

TDA also considers that some of the more detailed points for consideration (indicated in Appendix 1) should be implemented tertiary-sector wide. Where the logic of the suggestion applies beyond universities, a consistent approach will help to build a more aligned tertiary system.

## Introduction

TDA welcomes:

- the opportunities that an aligned tertiary education system will bring for a more inclusive nation of lifelong learners
- the panel's increased focus on skills and industry, bringing HE more in line with the mission of vocational education
- a deep discussion on the place of TAFE and dual sector universities as solutions to achieve the ambitious agenda of driving targets that improve equity outcomes; and
- the panel's consideration of policy settings needed to reflect TAFE being at the centre of skills development.

## Background

TDA has made three submissions to date to the Australian Universities Accord Review:

- the first presented case studies demonstrating the impact of TDA members in improving learner access to and success in higher education
- the second submitted TDA's TEN Big Ideas
- the third outlined how self-accreditation for TAFE might work.

This brief submission provides comments, including:

- reflections on three key points of most importance to TDA
- practical ideas that may progress those points
- comments on areas of specific agreement or disagreement to the Interim Report's detailed points for consideration
- possible measures of success.

## Assumptions

The following assumptions underpin TDA's fourth submission:

- To grasp the opportunities of the future, Australians will need to continue to gain skills and knowledge throughout their working lives. For many who hold post-school qualifications that may be the norm, but for those who have left and not pursued formal learning this will be a challenge. The tertiary education system needs to support this latter group in their lifelong learning pursuit. Many will have long working lives ahead, and many will come from disadvantaged groups, requiring support.
- Both HE and TAFE will need to grow significantly to accommodate more Australians to gain the skills they need for changing workforce requirements. Solutions arising from the Accord, and the subsequent government response, must support tertiary education to grow, without one part being at the expense of the other.
- The ability for learners and industry to command both quality higher education and vocational education solutions simultaneously and through improved alignment is vital.

- Government policy confirms TAFE is the centre of its skills agenda. The Accord calls for better alignment between HE and TAFE. Therefore, a strong TAFE system is essential for this next phase of tertiary education.
- The regulatory environment is struggling to manage diversity of organisational types leading to little difference in treatment of complex, very large not-for-profit and government owned organisations compared to smaller for-profit organisations. This approach fails to unleash the innovation that TAFE could deliver if the regulatory environment was more flexible and responsive to risk.

## Three big reflections

TDA's three key reflections on the interim report are addressed in more detail below.

### 1. Greater equity

TDA supports growth of higher education enrolments for equity groups, in ways that do not diminish the success TAFEs achieve in working with these groups. TDA also requests the Accord panel consider the value of TAFE higher education by extending CSPs to TAFE so that students have genuine choice.

TDA supports working with Australia's First Nations communities, students and staff, and giving voice to their needs through co-design and respect for continuous culture.

#### Risk of misdirecting students

With pressure on universities to increase their 'equity' enrolments, how best do we help direct potential students, including existing workers needing to upskill, to the appropriate entry point within an aligned tertiary sector? Where will they maximise their chances of successful learning? In many cases this will continue to be TAFE, and TAFE dual sector institutions.

Caution has been expressed that growth in HE numbers may be at the expense of students being well supported to engage fully in their learning experience. The risk of being 'set up to fail' by students choosing university instead of TAFE is high for many.

Supporting disadvantaged groups is a key role for TAFEs. TAFEs are known for their successful support of learners with greater or different needs. Whatever the qualification level, from Certificate I to degrees, TAFEs understand that today's students have complex requirements. TAFE expertise has developed because students are likely to come from a broader range of backgrounds – in terms of age, workforce history, cultural background, language or technology skills, financial security etc.

Of course, this more individualised approach is resource intensive and adequate funding is needed for wrap-around student support services. The most common request from TDA senior representatives to Treasury's current Employment White Paper drafting was overwhelmingly for discreet funding for wrap-around services. This is key to maximising student success. Increased resourcing of wrap around services to support successful outcomes for diverse needs, needs to be appropriately allocated. This funding should be directed to quality teaching and learning institutes such as TAFEs delivering higher education.

Policy and funding models must acknowledge that supporting disadvantaged groups has been and will continue to be a key role for TAFEs.

### **Fairer fees**

Fairer settings for CSPs and the HELP admin fee would be a big step towards supporting greater equity. TDA has raised this concern in many ways, including in previous submissions to the panel.

CSPs should be extended beyond skills shortage areas, as proposed, to any HE qualification offered by a TAFE or TAFE dual sector organisation.

### **Quality of teaching and learning**

The quest for higher quality of teaching and learning across the tertiary sector may benefit from qualifications, such as the type currently available to the TAFE workforce. The TAFE teaching and learning workforce has focused on building education capabilities combined with industry experience and expertise. TDA members support their teaching staff to attain specialist skills as part of degree level teaching qualifications.

A goal for the future tertiary sector may be a multi-pathway qualification that encourages continuous aspiration for teachers in TAFE and HE.

### ***Practical ideas for greater equity***

1. All programs funded to improve industry engagement, for example, TAFE Centres of Excellence or to improve alignment of equity efforts, might specifically build on teaching and learning approaches of TAFEs. A national approach to improving collaboration and sharing of knowledge through, for example, a broad representative committee may assist.
2. HE services in regional or remote areas should be incentivised to work collaboratively with TAFEs to support specific student needs.
3. The First Nations Higher Education Council mentioned in the Interim Report is supported and should be for all the tertiary sector and therefore renamed accordingly.

## **2. Industry collaboration and innovation**

TDA supports increased industry engagement by tertiary education that builds on the unique role TAFE currently undertakes in working with industry towards innovation in skills development.

### **Industry engagement**

Industry engagement is the DNA of TAFE and will continue to be TAFE's specialty.

By increasing the volume and depth of partnerships with universities, the tertiary sector, will benefit from sharing the methodologies and practices of TAFE. Part of the value proposition for universities to take up more partnerships with TAFEs is in sharing of effective industry engagement models, relationship management approaches and the flexibility and innovation needed to meet industry needs.

While this sharing will assist greater collaboration with industry, new policy and funding models are also needed to incentivise deep partnerships between industry, TAFE and

universities. The funding of pilot projects to test and refine models of collaboration in priority industries would be valuable. Industry and its tertiary sector partners will need to experiment with ways of engaging, building relationships, sharing and creating new knowledge and innovating towards joint solutions.

The value demonstrated by these pilots will also help to persuade industry partners to make greater actual investment in long-term workforce development. This may apply particularly to more explicit, less transferable skills that are needed by priority industries, where return on investment is high and specific to their field. A more aligned tertiary sector working closely with priority industries to build workforces in key areas may illustrate the optimum investment ratio between governments, industry and students.

The 'work and learn' model of TAFE is its specialty and should not be replicated through the creation of higher education apprentices if they come at the expense of funding for TAFE. However, should higher apprentices proceed, and TDA acknowledges the merit of such a direction, then TAFE led dual sector providers, or university led dual sector providers are well positioned to lead the implementation of this type of innovation.

### **Barriers to collaborative innovation**

Currently an over-reliance on government funding inhibits innovation in finding skilling solutions. Public resources may be considered best invested in skills that provide a basis for a broad and mobile labour force. But as higher-level skills are needed in more advanced and emerging areas, industry's co-investment should increase, through additional effort and financial contribution, for the benefit of responsive and rapid development of their sectors.

A high-quality tertiary sector relies on systems of oversight for TAFE and universities working more closely together. Where risk is low and managed, for example in partnerships between TAFEs and universities some harmonisation of regulatory requirements will facilitate greater creativity, faster responses and the level of flexibility industries constantly request.

For example, greater (public or private) funding of skill sets, or mixing and matching of units of competency with HE offerings to suit an employer's skilling issue is needed, rather than delivery of whole qualifications for the sake of it, and the consequent wastage that that incurs.

Allowing TAFEs with a proven quality record to self-accredit and develop client-focused products in collaboration with university partners will promote greater innovation and responsiveness in our fast-changing labour market.

An improved and more seamless linkage between the assessing of knowledge and skills within TAFE and university partnerships will support innovation and exemplars in adult education, boosting productivity and building the workforce needed for the future.

Regulation that allows TAFEs, as providers with multiple layers of governance and accountability, greater flexibility will help develop timely and inventive solutions with their industry and university partners.

## TAFE Centres of Excellence

As foreseen by the National Skills Agreement, TAFE Centres of Excellence will continue to be a key contributor to the fast-tracking of a greater and more effective industry focus by HE and TAFE.

Many exemplars using a centre of excellence approach for key industries exist within TAFEs across Australia. These can be expanded, or new centres created close to industry locations through a national networked approach.

The best of these operate where ongoing funding commitments have been secured from the outset. They operate not as educational facilities, but as industry hubs with a learning focus. Co-ownership between industry and government is key. All levels of government must be invested in the long-term operation of the Centres. TAFE leadership will be critical.

### ***Practical idea to support industry collaborative and innovation***

1. Support for pilots of HE apprenticeships that are led by experienced TAFE dual sector providers or university dual sector providers to provide practical application of the work and learn approach.
2. TAFE Centres of Excellence have the potential to advance TAFE and university partnerships with identified priority industries, such as those specified in the Interim Report and in the Communique of Skills Ministers on 25 August 2023. TDA has developed principles for TAFE Centres of Excellence that include active involvement of industry and universities, codesign, and applied research. The TAFE Centres of Excellence can form the base for new industry–TAFE–university partnerships. Funding of pilots, perhaps through the TAFE Centres of Excellence, in new industry–TAFE–university partnerships could stimulate the change process required.

## 3. Alignment

TDA strongly supports greater parity of esteem and alignment between TAFE and universities. But parity means more than the narrow context of student choice. To achieve parity of esteem both parties must operate in more similar environments. Critical to TAFE collaborating more deeply with universities will be their ability, as public, quality tertiary education providers, to self-accredit to develop appropriate shared innovative solutions.

A significant risk for some proposed policy directions is that TAFE becomes focused on entry level qualifications and the richness of its vocational diplomas is lost. If universities seek an expansion into TAFE's area of expertise, for example, work integrated diplomas, a shift in enrolments and funding is more likely than greater alignment.

While system refinement is needed to support alignment, more important is the development of a broader view of tertiary education from the perspective of students and industry. Co-design of increased alignment must include the consumer view if engagement with tertiary education is to be increased.

A more progressive effort to change perceptions of how education impacts the value of work and life is needed. The general view is unfortunately still that of a binary choice between TAFE and university. This pre-empts a difficult breach between the two.



An aligned tertiary system that more clearly demonstrates the differences and similarities between parts of the adult education sector, will provide greater and more informed choices. It will help students and industries navigate in, around, and in again at various entry and exit points, while undertaking lifelong learning.

### **TAFE at the centre of skills**

While not denying the value of applied knowledge, an increased focus on skills is rightly increasing as part of the panel's thinking on a future tertiary education agenda.

A new view of tertiary institutions that are more practice-based, where quality teaching and learning is as high a priority as research is emerging. This is the very definition of the TAFE model.

TDA supports the sharing of TAFE's expert knowledge of industry and skills within collaborations, while acknowledging that it is TAFEs alone that will always have this as their primary mission.

Helping consumers understand their needs and where in the tertiary system they will be most appropriately met is still paramount. For example, TAFEs will continue to excel in the upskilling of existing workers. Higher level certificates and diplomas from TAFEs also improve the employability of students by focusing on skills over knowledge. This is not the expertise of HE, but TAFE.

Current government policy is that TAFE is at the centre of skills. Tertiary education policy, and in particular skills settings, should continue to be made around that fundamental truth.

Suggestions that new national HE institutions be formed to service regions fail to maximise the value of the highly regarded national TAFE network.

### **Support for Tertiary Education Commission (TEC)**

TDA supports the establishment of a TEC, as a way to see real change, with long-term oversight that is not impeded by the day-to-day operations of government.

Part of its role could be to support, incentivise and promote exemplars of TAFEs working in true collaborative partnerships with industry and universities.

TDA cautions against an initial focus on HE only for TEC and requests that TAFE is included initially rather than later as proposed. Otherwise, there is a risk of sidelining TAFE as the perpetual 'poor cousin' to universities, in contradiction of efforts towards a more aligned tertiary sector. TAFE needs to be built in now, not bolted on later.

Funding and governance arrangements for TAFEs necessarily involves State and Territory governments, as an extra layer of accountability. But extra resource support for TAFE to build a more tertiary aligned approach might still logically be available via the TEC. Dealing with a variety of provider types will necessitate the prioritising of categories for incentives, perhaps to where broadest change can occur, such as in a nationwide network of TAFEs or in specific pilots.



Issues of particular interest for a newly formed TEC to progress may include:

- Implementing AQF reform and possibilities for more integrated vocational and higher education components
- Progressing high quality RPL in a more aligned system
- How micro-credentials can be best supported for TAFE and HE
- Best practice models of product co-design
- Supporting broader, more flexible products to meet diverse needs
- Self-accreditation for TAFE – building beyond national training products
- Regulatory alignment for tertiary providers such as TAFEs, where quality is also proven by extra governance and government accountability
- Funding pilots that incentivise TAFE – industry – university partnerships.

### **TEQSA for TAFE**

The regulatory environment is struggling to manage diversity of organisational types leading to little difference in treatment of complex, very large not-for-profit and government owned educational entities compared to smaller for-profit organisations. This approach fails to unleash the innovation that TAFE could deliver if the regulatory environment was more flexible and responsive to risk.

It is TDA's proposal that all TAFEs, which are large and complex, more like universities than other training providers, move to TEQSA. Noting, of course, that more than half of the 23 TAFEs are already regulated by TEQSA. Alignment and efficiency are more likely to be achieved with one regulator for TAFE.

### **Regional focus**

TDA welcomes efforts towards a greater regional and remote presence for tertiary facilities but considers this should build on the existing footprint and community brand of TAFE.

Leveraging existing TAFE infrastructure, when creating for example, more Tertiary Study Hubs (note preferred inclusive title) or a new regional university, will result in savings.

Practical savings in the possible reuse or expansion of building and campus facilities may be obvious. But it would also build on TAFE's existing community and, more specifically, industry engagement history. The community capital and brand recognition that TAFE enjoys, particularly in regional and remote areas, can be expanded on.

Additionally, the workforce culture necessary in a tertiary provider, if it is to have the skills and industry focus proposed by the Interim Report, already exists within TAFEs, waiting to be built on.

Suggestions that new national HE institutions be formed, or as stated by Nobel Laureate Brian Schmidt in the Australian Financial Review, that "private for-profit colleges will increasingly take on the task of educating new generations of professionals ..." (Monday 28 August 2023) are ill founded when Australia already has a national TAFE network.

### ***Practical ideas for greater alignment***

1. TEC implement a new mission compact that would incentivise partnerships between local TAFE, industry and universities. This program might be designed to:

- Focus on identified priority industries and clearly articulated emerging needs
  - Ensure the formation of place-based relationships and responses that build into national needs and policy, from the 'bottom up'
  - Begin with dual sector TAFEs (over half of TDA's members) to fast-track impact
  - Ensure 'alignment' of tertiary providers is broad and diverse, not focusing simply on the obvious such as articulation pathways
  - Acknowledge that partnership models will be diverse in response to local, regional, state and industry needs. Variety in approach should be facilitated.
2. A new program that invests in building the capability of the tertiary education workforce necessary for truly 'aligned' approaches recommended by the Panel. This would help to build expertise in TAFE and universities, for example, to better meet the needs of industry, as well as students from equity backgrounds.

## Measures of success

Depending on the Panel's findings, metrics for success that may be appropriate to track the outcomes of recommendations may include:

- Student outcomes of new funded programs that facilitate greater engagement between TAFE, universities and industry
- Growth in equity group participation doing higher education in TAFE or in place-based compacts between HE, TAFE or dual sectors
- Success of co-design products and curriculum in terms of meeting industry needs
- Industry currently provides TAFEs with engagement scores. A similar quality indicator could be introduced for universities.
- An annual survey of Tertiary Education Commission performance.

## Conclusion

A more collaborative future tertiary education sector, that continues to recognise the unique role TAFEs will continue to play, is welcomed.

Key to the success of greater successful partnerships between TAFE and universities is:

- equity expertise to support students and funding for wrap around services
- effective industry engagement and support for greater innovation
- alignment that maximises better impacts for students and industry.

TDA considers that the Accord can be a once in a generation positive policy direction for Australian tertiary education. However, some directions may see TAFE diminished if an expansion of HE comes at the expense of TAFE and vocational education.

Additionally, TAFEs' capability in higher education must be recognised. There is the potential for a genuine missed opportunity if TAFE, with its priority on teaching and learning and regional footprint, is not considered as integral to the proposed expansion of HE. To achieve that students must be able to access CSPs to study higher education at TAFE.

TDA welcomes further discussion and agreement on actions and investment needed to implement the Panel's findings.

## Appendix 1

### Areas of agreement and disagreement

Please note that only actions with specific comments are included.

Response to Priority Actions 1 – 5		
Priority action	Status	Comments
<i>1. Extend visible, local access to tertiary education by creating further RUCs and establish similar concept for suburban/metropolitan locations.</i>	Supported	It is important that existing and future hubs NOT continue to be identified as Regional University Centres. The term Tertiary Study Hubs is supported as it signals the inclusion of TAFE students.
<i>3. Ensure that all First Nations students are eligible for a funded space at university, by extending demand driven funding to metropolitan First Nations students</i>	Supported	Extend this principle to all tertiary education and recognise that TAFE with its existing high numbers of First Nations students relative to other RTOs is a good place for entry, be that for either vocational education or higher education (the latter requiring CSPs for fairness).

Response to Chapter 2 – Evolving the mission		
Report reference	Status	Comments
A – Putting First Nations at the heart of Australia’s HE system <i>a. creating a new First Nations Higher Education Council to give voice to the needs, aspirations and know-how of community</i>	Supported	Extend this Council’s remit to tertiary education, not just higher education
C – Meeting Australia’s future skill needs <i>a. new policy levers to enhance capability across the tertiary education sector, enabling it to respond rapidly to Australia’s skills needs and deliver the necessary numbers of graduates with professional, disciplinary and high order generic skills</i>	Supported in principle	Welcome further discussion on the nature of policy levers. TAFE self-accreditation must be one aspect.

<p>C – Meeting Australia’s future skill needs</p> <p><i>h. extending CSPs at some AQF levels to the TAFE sector in areas of crucial skill need</i></p>	<p>Alternative perspective offered and clarification needed</p>	<p>Student choice is important. While crucial skill need is important, so is the broader principle of students choosing more supported learning environments, such as TAFEs. The extension of CSPs should be for students studying higher education at TAFEs and for higher level vocational education programs.</p>
<p>C – Meeting Australia’s future skill needs</p> <p><i>k. improving Work Integrated Learning (WIL) and placements by providing participating students with better incentives and financial support</i></p>	<p>Supported</p>	<p>Extend principle to all tertiary education students.</p>
<p>E. Excellence in learning, teaching and student experience</p> <p><i>Points a, b, c, d</i></p>	<p>Supported</p>	<p>Extend principle to all tertiary education contexts. Utilise the educational expertise of TAFE to enable excellence in learning, teaching and student experience.</p>

### Response to Chapter 3 – Foundations of a high functioning national system

Report reference	Status	Comments
<p>A. A coherent national tertiary system</p> <p><i>a. the benefits of establishing a new national body, a Tertiary Education Commission, working with the Minister and Department, which could:...</i></p> <p><i>v. over time, and in partnership with the states and territories, be expanded from higher education to encompass the whole tertiary education system to pursue greater opportunities for alignment and collaboration between the higher education and VET sectors.</i></p>	<p>Supported, in principle</p>	<p>The commission should begin as it means to go on – focused on tertiary education, HE and TAFE tertiary educational entities.</p> <p>Delaying the inclusion of TAFE means that relationships will not be fostered, innovation of skills and knowledge not achieved and undermines parity of esteem efforts.</p>