

AUSTRALIAN TERTIARY EDUCATION COMMISSION IMPLEMENTATION CONSULTATION PAPER

July 2024





ABOUT THE REGIONAL UNIVERSITIES NETWORK

The Regional Universities Network (RUN) welcomes the opportunity to comment on the "Australian Tertiary Education Commission Implementation Consultation Paper".

RUN is a national collaborative group of seven regional Australian universities: Charles Sturt University, CQUniversity Australia, Federation University Australia, Southern Cross University, University of New England, University of Southern Queensland, and University of the Sunshine Coast.

This submission reflects the positions of RUN institutions, and in doing so, also aims to represent the views of those students and communities which RUN universities serve; the one-third of Australians who live outside of metropolitan centres in Regional, Rural and Remote locations.

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OVERVIEW

RUN is supportive of an entirely independent Australian Tertiary Education Commission (ATEC), established under legislation as a statutory national body. Specifically, RUN is supportive of Recommendation 30 arising from the Australian Universities Accord (the Accord) Final Report which details the establishment of an ATEC. RUN also extends its support to the Accord Final Report's rationale sitting behind the establishment of an ATEC, as well as its stated objectives, particularly insofar as it would exist to encourage diversity and student choice within a high quality and cohesive tertiary education system. As the hosts of Australia's highest concentrations of underrepresented student cohorts, RUN welcomes the choice, equity and diversity objectives of the proposed ATEC, and offers feedback to this consultation process that seeks to enhance the focus, impact and independence of the proposed ATEC for the benefit of regional Australian communities.

However, *RUN holds concerns about the views expressed in the consultation paper regarding the exclusion of specialist sectoral staff from their involvement in the ATEC, both at the Commissioner and operational staffing levels.* The exclusion of those who have worked in a leadership position in the tertiary sector "within a set number of years", *fundamentally undermines the ATEC.* To achieve the stated objectives of the ATEC, it must be led by those who have a lived experience, understanding, and knowledge of the tertiary education sector. RUN does not believe that contemporary knowledge and a history of working in the sector would preclude a Commissioner from having a national interest view of decision-making.

RUN is also concerned that the successful implementation of the ATEC and its broad mandate will be undermined by the resourcing, structure and timeframes outlined in the consultation paper. *RUN believes the implementation of the ATEC needs to be stage-gated in a multi-year process* that involves more frequent and meaningful iterative reviews to solidify lessons learned from the implementation process in order to arrive at a

more optimal end result. RUN holds significant concerns that the ATEC will not be resourced appropriately to successfully meet its stewardship obligations. RUN is also concerned that the ATEC's structure is far too limited to either appreciate the diverse needs of our national higher education system (with specific concerns over the lack of dedicated regional voice in decision-making), or to be able to meet its anticipated workloads sufficiently.

RUN is highly supportive of the stated role of the ATEC in creating a more harmonised higher education – VET landscape, and provides feedback that compliment this important objective. RUN is also highly supportive of the elevation of First Nation focus and representation in the design of the ATEC and looks forward to contributing to the success of this important mandate.

Finally, rather than being designed to proactively reduce the net regulatory burden upon providers, the design of the ATEC seems to be canvassed in such a way that merely attempts to minimise the additional burden the ATEC is likely to create. *RUN considers this to be an unexpected and disappointing feature of the proposed ATEC that will further divert the limited resources of smaller/regional universities from their core duties.*

EXPERTISE REQUIRED FOR A SUCCESSFUL ATEC

RUN is highly supportive of a *truly independent ATEC*. True independence will be a crucial feature to ensure the effective functioning of the ATEC. RUN believes that the Australian Research Council (ARC) is a model that should be considered for the ATEC, and that *the ATEC as proposed in the consultation paper must demonstrate greater independence*, with this being discussed in more detail in subsequent responses.

In terms of ensuring the ATEC has sufficient expertise in the higher education sector, RUN believes that attention should be given to current, contemporary operational experience that can be found more readily within the sector. This highly contextualised operational experience would be much harder to find within the ranks of the public service. To meet the objectives of the ATEC, and to best serve the national interest, *it is imperative that the ATEC leverages the lived experience and highly skilled human capital that exists in the tertiary sector.*

In doing so, RUN believes it would be entirely possible to manage concerns around the representation of sectoral interest (at the expense of national interest), in line with existing provisions that manage conflict of interest. Given the breadth of the ATEC's proposed remit and activities, RUN holds concerns that the ATEC will be unable to achieve its goals by excluding the experiences, knowledge, and skills of Australia's current university workforce.

■ RUN BELIEVES

the ATEC will be unable to achieve its goals by excluding the experiences, knowledge, and skills of Australia's university workforce.

In order to achieve the objectives of the ATEC, and ensuring the ATEC has sufficient expertise, RUN suggests the adoption of a staged implementation plan for the ATEC where its broad mandate is implemented in carefully considered stages. Such an approach will provide greater flexibility for the ATEC to obtain the specialist knowledge it requires for each part of its implementation.

■ RUN RECOMMENDS

that the ATEC adopts a staged implementation plan where its broad mandate is implemented in carefully considered stages.

RUN was pleased to see the geographic maldistribution of attainment arising from our national tertiary system acknowledged so clearly as a matter of national importance in the Accord's final report. With regard to 'national interest' decision-making, RUN would urge for *greater consideration of the nuance that often distinguishes national interest from regional interest, noting that often the two do not neatly align*. A 'national interest' view of the sector often resembles Australia's metropolitan context, as regional circumstance is often 'washed out' by sweeping, aggregated assumptions. This is often the case, for example, when skills shortage/severity are being discussed where the national view is not congruent with the regional experience.

RUN holds concerns that, in the design of the ATEC as outlined in the consultation paper, regional Australian interests may have been dismissed as narrow sectoral views. *Regional interests are firmly matters of national interest.* Almost four in every 10 Australians now live in regional Australia, yet the regions still host the highest concentrations of underrepresented student cohorts, and the lowest rates of tertiary attainment in the nation. RUN was therefore disappointed by the absence of any dedicated regional representation in the 10-member Accord Implementation Advisory Committee. This was a missed opportunity to ensure the important start-up phase of the ATEC reflected a more comprehensive and representative assessment of national interest objectives. Moving forward, RUN believes it is important to ensure that the stewardship of our higher education system has the structure, expertise, and agency to adopt a more nuanced view of the needs of regional Australians.

■ RUN BELIEVES

that the stewardship of Australia's higher education system must recognise the structure, expertise, agency, and needs of regional Australians.

ATEC'S LEGISLATED OBJECTIVES

Objective (a)

RUN is eager to ensure the ATEC is successful and accountable in meeting objective (a): *"equitable opportunity through supporting all Australians to access and participate in high-quality, engaging and transformative tertiary education programs"*, noting the higher gains to be realised in doing so outside of our largest cities. However, RUN would like to see Objective (a) restore words that have been removed from their original representation in the Accord Final Report – National Tertiary Education Objective, namely:

(a) affordable and equitable opportunity through supporting all Australians to access and participate in high-quality, engaging and transformative tertiary education programs.

RUN hosts approximately one-fifth of all domestic students from low socio-economic backgrounds in Australia, the highest proportion of any university group. As such, RUN prioritises the affordability of study, beyond that of fee/loan pricing alone to include things such as the affordability of compulsory placements, the upfront costs of study, and the affordability of loan repayments, for instance.

RUN BELIEVES

that 'affordability' should be reinstated as a key focus for ATEC's legislated objective (a) as part of a new Higher Education Funding Act.

Objective (b)

"A productive economy and society through the delivery of highly skilled and educated graduates, and through facilitating the production and application of new knowledge"

RUN appreciates acknowledgment of the role that 'the production and application of new knowledge' plays in a 'productive economy and society'. RUN is eager to see this proposition preserved and enhanced in the context of how it will benefit regional economies and societies, and their need for comprehensive research-active local universities that produce both degree and research-trained workforces.

Objective (c)

"A strong civic democracy through institutions that foster robust debate and critical inquiry and contribute to Australia's cultural and intellectual life".

RUN universities acknowledge and embrace their social role in supporting both a 'strong civic democracy' via 'robust debate and critical inquiry', and in contributing to 'cultural and intellectual life', noting that there are fewer instruments available to regional communities that can facilitate this vital civic function.

RUN welcomes the acknowledged role of universities to this end, underscoring the need for all providers to be able to deliver viable access to an equitable range of tertiary services, facilities and opportunities, regardless of location.

Achieved via:

With regard to *"The ATEC will achieve this purpose through: (a)"*, RUN would like to see the restoration of the full statement from the Accord Final Report – National Tertiary Objective, to include "infrastructure", noting the central role played by access to tertiary infrastructure in a 'strong, dynamic and efficient' higher education system. As such RUN proposes the following words:

"Facilitating a strong, dynamic and efficient tertiary education system that has the capacity, capability and infrastructure it needs."

RUN RECOMMENDS

that infrastructure is included in the legislated objectives, consistent with the Australian Universities Accord Final Report – National Tertiary Objective.

RUN recognises that access to high quality tertiary facilities and experiences has a profound impact upon student aspiration, retention and success, especially those from underrepresented backgrounds. University infrastructure is often utilised not just by students and staff but also by regional communities themselves. RUN hold

ATEC'S LEGISLATED OBJECTIVES

concerns over any widening of the systemic disadvantages facing the universities of regional Australia in terms of an institution's capacity to finance, build and maintain world class tertiary infrastructure, as compared to those universities operating at scale in densely-populated urban markets. As such, RUN would not support the seemingly diminished view of university infrastructure taken by the proposed ATEC in the consultation paper.

I RUN OPPOSES

the diminished view of university infrastructure taken by the proposed ATEC in the consultation paper.

The consultation paper proposes that the ATEC be subject to an external review 'after several years of operation'. RUN would instead reinforce the need for a (multi-year) staged

approach to the implementation of ATEC and its functions, accompanied by a process of rolling implementation assessment that reviews what is working well and what is not, in recognition of the broad and ambitious magnitude of the ATEC's implementation. It is important that the process of transferring key responsibilities from the Department of Education to ATEC, alongside the roll-out of the new funding model in consultation with the sector, does not occur with a several-year wait for indications of its success.

I RUN RECOMMENDS

a multi-year staged approach to the implementation of ATEC and its functions, accompanied by a process of rolling implementation assessment.



THE PROPOSED STRUCTURE OF ATEC

RUN does not believe that the proposed structure of the Commission including consultation with other relevant stakeholder allows for effective decision-making processes.

■ RUN BELIEVES

the proposed structure of the Commission will not enable effective decision-making processes.

Similarly, RUN does not support the ATEC structure proposed by the consultation paper.

■ RUN OPPOSES

the ATEC structure proposed by the consultation paper.

Instead, RUN supports an ATEC structure that mirrors that as outlined by Recommendation 30 in the Accord Final Report.

Accord recommendation #30:

The Australian Tertiary Education Commission should be governed by a Board comprising the Chief Commissioner as Chair, 2 Deputy Commissioners, the TEQSA Chief Commissioner, the ARC Board Chair, a First Nations Commissioner, an Equity Commissioner and the Regional Education Commissioner.

■ RUN RECOMMENDS

an ATEC structure that mirrors Recommendation 30 in the Australian Universities Accord Final Report.

Further to the ATEC structure proposed by the Accord Final Report, RUN would recommend that the Chair of the Higher Education Standards Panel also occupy a position on the ATEC Board.

■ RUN RECOMMENDS

the Chair of the Higher Education Standards Panel also occupy a position on the ATEC Board.

RUN considers the lightened governance structure of the ATEC, as proposed in the consultation paper, to be *inadequate in representing and reflecting the diversity of Australia's higher education system*. It would

be difficult to see how the four proposed ATEC statutory office holders could collectively hold the expertise in, or effectively represent the interests of, the four additional Commissioners recommended in the Accord Final Report (that is, the TEQSA Chief Commissioner, the ARC Board Chair, an Equity Commissioner, and importantly, the Regional Education Commissioner).

■ RUN RECOMMENDS

the TEQSA Chief Commissioner, the ARC Board Chair, an Equity Commissioner, and the Regional Education Commissioner be additional Commissioners of the ATEC.

RUN notes that the proposed ATEC Commissioners "will be able to consult with and draw on the expertise of other officials" (including, amongst others for instance, those omitted above). However, RUN would prefer to see these important interests directly reflected in the structure of the ATEC as statutory office holders, rather than existing as consultation options if/when required. In making this recommendation, RUN would provide the clarification that it sees the bodies/offices represented by those omitted Commissioners remaining positioned where they currently are. RUN is not advocating that they be brought under the auspices of the ATEC structure.

Regarding dedicated regional representation on the ATEC Board (for instance, via the appointment of a Regional Education Commissioner, or alternatively, the appointment of a Commissioner that has contemporary lived experience working in a regional university setting), RUN would revisit the points made in its response to question one (above), regarding *the importance of specialised regional nuance in national-interest decision-making*, noting that 'national interest' often results in a reflection of metropolitan circumstance, to the detriment of regional contexts. RUN would consider this a highly relevant consideration to be made against the clear equity objectives and targets outlined in the Accord Final Report, which concern regional Australia most keenly.

THE PROPOSED STRUCTURE OF ATEC

Although RUN supports a larger and more representative ATEC Board aligned to that recommended by the Accord Final Report, RUN would nonetheless offer the following feedback to the outline of the ATEC board as outlined by the consultation paper.

If a dedicated regional Commissioner role were not added to the ATEC board structure, then at least one of the Deputy Commissioner roles should be being reserved for candidates that can demonstrate ongoing lived regional experience. *Contemporary and current lived regional experience should be given preference over candidates who may have lived/worked in a regional setting at some point in the past.*

RUN does not support the appointment of Commissioners on a part-time basis, and recommends full-time roles be established in order to meet the magnitude and importance of the ATEC's mandate, and the likely associated workloads.

■ RUN RECOMMENDS

the appointment of Commissioners to be on a full-time basis.

The ATEC *must be more effectively resourced and structured*, than that which is proposed by the consultation paper. Furthermore, and as previously discussed, the broad and ambitious mandate of the ATEC must be implemented in a staged approach that is accompanied by a rolling implementation-assessment review.

RUN does not believe the ATEC would be best served by a blanket exclusion of relevant and contemporary expertise sourced from within the sector itself to the Commissioner roles, noting the limitations of alternative recruitment pools.

■ RUN OPPOSES

the blanket exclusion of relevant and contemporary expertise sourced from within the sector itself to the Commissioner roles.

RUN supports the notion that concurrent sectoral and Commissioner appointments be avoided. However, this should not exclude the

utilisation of targeted (full-time) secondments from within the sector (to Commissioner or advisory roles) on an 'as-required' basis when dealing with distinct matters that require specialised, operational expertise.

RUN opposes the requirement that would disqualify the appointment of candidates who have "worked in a leadership position in the tertiary sector within a set number of years". *The ATEC's best interests would not be served by excluding those who can bring the most relevant, nuanced and operational expertise to the decision-making process.* There must be a carefully considered balance struck between the need for Commissioner independence, and the need for Commissioner contemporary expertise in how modern universities operate, and the conditions in which they operate, in a highly fluid and complex higher education landscape. RUN urges consideration for how this balance may be upheld in a number of different ways, without relying solely upon the "set number of years" disqualifier.

The ATEC would benefit from greater detail concerning the length of Commissioner position appointments, and the transparency measures underpinning the selection process of appointing Commissioners.

RUN supports the establishment of a First Nations Council, as a consultative body to the ATEC, as recommended in the Accord Final Report. RUN would recommend that the First Nations Council specifically reserve some membership for the explicit representation of regional First Nations needs and interests. This acknowledges that the majority (approximately six in 10) First Nations Australians live outside our capital cities.

■ RUN SUPPORTS

the establishment of a First Nations Council.

RUN notes that the Accord recommended the establishment of a dedicated Learning and Teaching Council, which RUN would support as a body that ensures the identification and promotion of best practice learning and teaching models as a resource for the

THE PROPOSED STRUCTURE OF ATEC

sector. Similarly, RUN would recommend that a Learning and Teaching Council specifically reserve some membership for the explicit representation of regional teaching and learning contexts, acknowledging the considerable differences that exist between metropolitan and regional student cohorts.

RUN notes that the consultation paper's list of Consulted Officials (while presented as a non-exhaustive list) does not reflect representation of neither the international student sector, nor students themselves (domestic or international) which would be a major oversight if realised. RUN recommends that representation of students and the international student sector be included in the formal, final list of ATEC Consulted Officials.

RUN RECOMMENDS

that representation of students and the international student sector be included in the list of ATEC Consulted Officials.

RUN advocates for the proposed annual "State of the Sector" ATEC report on higher education outcomes *to include a standing chapter that specifically tracks and focusses upon regional Australia*. This standing chapter would report over time, tracking against issues such as regional participation/attainments rates (at both undergraduate and postgraduate levels); regional research outcomes; international students studying upon regional campuses; and regional equity of access to tertiary facilities/infrastructure.

In addition to the annual "State of the Sector" ATEC report, and as per the Accord Final Report (recommendation #36), RUN recommends that the ATEC also produce a rolling triennial planning report, to evaluate the system's progress towards shared goals, report on broader performance of the system, share good practice, and identify emerging issues.

RUN RECOMMENDS

the ATEC also produce a rolling triennial planning report.

RUN urges greater clarity around the ATEC's obligation to deliver upon 'Government objectives', including the statutory powers yielded by current/future Ministers to 'direct the ATEC on particular matters', and what safeguards will be in place to prevent political/ideological/operational overreach.

RUN places a high priority on the independence of the ATEC from the Department, including its perceived independence, and would therefore advocate for the ability to provide feedback on alternative administrative models.

In terms of broader staffing appointments to key positions, RUN would like to see an *ATEC include consideration of a more balanced recruitment focus*. Notwithstanding the expertise that exist within the public service, RUN believes that for the ATEC to deliver upon its objectives, it is vital to cast a broad net for staff recruitment that hires the best and most experienced staff, including that staff that will be able to utilise their experiences from working within universities. Too often, public sector consultations are conducted in a way that exposes a need for higher levels of familiarity with the nuances of the higher education sector. *It will be in the national interest to have an ATEC that is staffed by those with the requisite expertise, knowledge, and experience to deliver upon its objectives.* It will equally be important for the ATEC to have the correct culture, tone, and experience to navigate highly technical policy matters where a one size fits all approach is simply inadequate.

ATEC'S STEWARDSHIP

RUN agrees with the Accord Final Report's definition of responsible stewardship:
"There should be a shared responsibility for higher education between universities, as autonomous institutions, and the Commission as the system steward."

RUN recommends that the definition of responsible stewardship, as provided by the Accord Final Report, be built into the ATEC's enabling legislation.

■ RUN RECOMMENDS

the definition of responsible stewardship, as provided by the Accord Final Report, be built into the ATEC's enabling legislation.

RUN supports an ATEC designed to work in partnership with states and territories, through existing structures like National Cabinet, the Education Ministers Meeting, the Skills and Workforce Ministerial Council and the shared stewardship model for VET established by the National Skills Agreement.

■ RUN SUPPORTS

the ATEC working in partnership with states and territories.

RUN supports the suggestion in the Accord Final Report that the ATEC, as sector steward, should take on responsibility for supporting the Higher Education Standards Panel (HESP).

■ RUN SUPPORTS

the ATEC being responsible for supporting the Higher Education Standards Panel (HESP).

The powers currently proposed for the Minister of Education to set caps on international students by provider, location and course should transfer to the ATEC. This would align to the ATEC's role in managing growth within domestic cohorts, while providing a greater degree of administrative independence and continuity. RUN strongly believes the ATEC's stewardship should encompass international education.

■ RUN BELIEVES

the ATEC's stewardship should encompass international education.



ATEC'S REGULATORY BURDEN

Australian universities operate in a highly regulated environment, which is an important and necessary feature of a robust and sustainable tertiary sector. Nonetheless, *there are features of the existing regulatory environment that represent avoidable duplication in reporting and data collection, resulting in unnecessarily complex regulatory burdens worn by providers*. Australia's higher education regulatory framework is multi-jurisdictional, with providers currently being accountable to the regulatory requirements of the TEQSA at a Commonwealth level (in addition to regulatory requirements for dual-sector providers via the Australian Skills Quality Authority), and various other requirements at a State and Territory level. *Often, the existing data and reporting requirements across this multijurisdictional landscape are duplicated, resulting in unnecessarily higher costs of compliance*. In recent years, several new compliance requirements have been introduced with associated cost burdens. While RUN recognises the importance of these compliance initiatives and supports their inclusion in Australia's tertiary regulation framework, the cumulative cost of compliance continues to grow with no corresponding provisions made in funding models. *The continual growth in regulatory compliance equates to a significant investment in resourcing that otherwise diverts from core business*. These costs are more difficult to absorb when operating in sub-scale environments, as is the case for RUN universities. RUN recommends a light-touch, report-once approach to reforming the sector's current regulatory environment.

RUN RECOMMENDS

that ATEC adopt a light-touch, report-once approach to reforming the sector's current regulatory environment.

The Accord Final Report's proposed system governance proposals, including the ATEC, were *"intended to be implemented in a way that reduces administrative burden on institutions whilst increasing tertiary education system intelligence, harnessing system capability and reinforcing institutional autonomy"*. While the ATEC implementation consultation paper

proposed one of its functions would be to *"drive improvements in regulatory systems"*, RUN would require greater reassurance that net institutional administrative burdens would be reduced. Indeed, *the post-Accord reforms implemented or being considered to date have increased institutional administrative burdens*, particularly with regard to governance and reporting. RUN recommends that ATEC must prioritise a whole-of-system review of regulatory settings and identify levers across the Australian Government – as well as across the states and territories – to both streamline and reduce the sector's net administrative burden.

RUN RECOMMENDS

that ATEC prioritise a whole-of-system review of regulatory settings and identify levers across the Australian Government – as well as across the States and Territories – to both streamline and reduce the sector's net administrative burden

The ATEC's objective *should not be "ensuring minimal additional regulatory burden on the sector", rather it must be to find opportunities to reduce that burden* by:

- Removing obsolete and low value regulations and reporting requirements.
- Consolidating duplicate regulation and reporting across federal portfolios and state and territory governments.
- Using technology to simplify information requests while retaining robust security and privacy protections.

RUN strongly supports the ATEC being an engaged body that regularly consults with the tertiary sector and fully utilises the expertise of the human capital contained within the tertiary sector.

AUSTRALIA'S TERTIARY FUTURE & ATEC GOVERNANCE

RUN holds the foundational belief that when a student accepts a place at an Australian university – whether they are from an underrepresented background or not – they should expect and receive a comparable and equitable standard of fundamental tertiary provisions (such as support services and resources, facilities and infrastructure, research progression opportunities, and/or choice in offerings) regardless of the university they have chosen. To this end, RUN supports many of the aspirational objectives articulated by the Accord Final Report including promoting greater equity of access and support to participants of higher education, and in building aspiration amongst underrepresented groups such that Australia's graduate population eventually reflects more closely the demographic composition of Australian society.

■ RUN SUPPORTS

the aspirational objectives articulated by the Accord Final Report including promoting greater equity of access and support to participants of higher education, and in building aspiration amongst underrepresented groups.

It is important the ATEC also assumes the lead role in refocussing Australia's Higher Education system away from a historic policy focus that primarily concerns school leavers studying a full-time load, on-campus. *Contemporary student and workforce expectations resemble a life-long approach to learning and upskilling via increasingly flexible delivery modes.* The ATEC must break the legacy of requiring institutions to label their students and offerings as either internal or external, when the evolving reality points to a multi-model future. This then challenges the rationale of applying geographical catchments in a virtual system. Within this context, RUN views a successful tertiary future state as one that demonstrates the following complimentary features:

- Access to comprehensive, research-active universities and research-trained workforces for regional Australians.
- Enrolment growth driven by greater equity.
- Equity attainment targets inclusive of post-graduate cohorts.
- Preservation of student choice.
- Preservation of institutional authority in mission-setting.
- Greater alignment between higher education and VET sectors.
- Streamlined regulatory obligations.
- A greater promotion of the social dividends realised via contemporary tertiary infrastructure.

To achieve this, the governance/stewardship of ATEC must:

- Have enhanced access to robust and timely data for more informed, evidence-driven decision-making.
- Demonstrate greater independence than that proposed by the consultation paper.
- Consult regularly and authentically with the sector, so that providers and other stakeholders are participants in reform.
- Be more adequately resourced and structured (than that proposed by the consultation paper) to adequately meet the size and importance of its expected mandate.
- Break the metro-centric legacy of the higher education policy landscape, via distinguishing regional interest from national interest, and elevating the voices of regional Australians in representative decision-making.
- Reduce the regulatory burden on the sector.

A HARMONISED TERTIARY EDUCATION SECTOR

RUN is supportive of measures that result in a greater harmonisation between higher education and VET. An important step in supporting this objective would include the implementation of recommendations stemming from the Review of the Australian Qualifications Framework in alignment with the National Skills Framework.

Importantly, RUN would recommend that the starting point of any harmonisation initiatives begins with a more clearly defined

problem statement addressing the specific harmonisation issues currently at play within the higher education and VET sectors, and how current policy, regulatory, funding and behaviours are failing our current and future workforces.

RUN welcomes the involvement of the states and territories in ATEC's harmonisation mandate but calls for a broader view of how harmonisation serves both national and regional objectives.





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