

15 January 2026

The Regional Universities Network (RUN) welcomes the opportunity to provide the following submission to the Universities Accord (Australian Tertiary Education Commission) Bill 2025 and a related bill inquiry.

RUN is a national collaborative group of six regional Australian universities:

- Charles Sturt University;
- CQUniversity Australia;
- Federation University Australia;
- Southern Cross University;
- University of New England; and
- University of Southern Queensland.

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

## Overview

RUN reiterates its support of the process that delivered the Australian Universities Accord Final Report. The equity-driven objectives of the Accord, and the recommendations that accompanied it, will ensure a more balanced and sustainable higher education system that benefits all Australians into the future, regardless of background or location.

As such, RUN remains highly supportive of the establishment of an Australian Tertiary Education Commission (ATEC) as recommended by the Accord.

The ATEC was recommended to be an independent and expert body that will deliver stewardship of the tertiary education sector, with a broad range of responsibilities. If designed and implemented effectively, the ATEC will unlock the fuller skills potential of Australia and of regional Australians in particular. RUN acknowledges that ultimately, much of the ATEC's potential to impact positively on the tertiary opportunities afforded to all Australians will stem from an appropriately designed legislative and regulatory framework. RUN wants the ATEC to succeed in delivering upon its vital mission and welcomes this opportunity to submit feedback to the ATEC's legislative design. As such, RUN advocates for a number of important yet practical amendments to the proposed legislation that it believes will ultimately enhance the effectiveness of the ATEC to perform its important duties.

Specifically, RUN believes there are legislative amendments required to address two crucial issues, that would ensure the ATEC is truly fit-for-purpose as an effective sectoral steward. These issues concern matters of the ATEC's legislated expertise and independence:

- The need for the ATEC to establish a committee of expertise to determine the Higher Education Standards Framework; and,
- The need for the ATEC to independently provide robust, unprompted advice to Government at its own discretion.

RUN echoes the Government's desire to see an ATEC whose stewardship of the higher education sector is characterised by expert and independent advice. While RUN supports the principles of the proposed ATEC, RUN holds concerns around the limited degree of independence and expertise granted to the ATEC within the Bill for it to perform its stewardship function most effectively.

Other important amendments that would enhance the ATEC's ongoing impact as sector steward would include:

- Enabling the ATEC to provide advice on the student contribution component of student funding, as well as Commonwealth contributions;
- Dedicated legislative inclusions to the ATEC's functions in relation to higher education infrastructure and research;
- The number and composition of the ATEC Commissioners;
- The ability of the ATEC to appoint its own staff at its own discretion;
- More explicit requirements for the ATEC's consultative activities; and,
- Greater granularity around the National Tertiary Education Objective.

The specific amendments that RUN advocates are provided in more detail as follows.

## **Amendments**

### **Higher Education Standards Panel**

RUN supports the case for the ATEC holding responsibility for the Higher Education Standards Framework. RUN acknowledges that under Part 2, Division 5, Section 25 Other committees (2) of the Universities Accord (Australian Tertiary Education Commission) Bill 2025, the ATEC will be able to "establish other committees as to provide advice or recommendations to the ATEC in relation to the performance of the ATEC's functions". However, RUN is concerned that repealing the Higher Education Standards Panel from the TEQSA Act (as done in 'Schedule 1, Section 16 Part 9' of the Universities Accord (Australian Tertiary Education Commission) (Consequential and Transitional Provisions) Bill 2025) without formally replacing the panel within the ATEC (via the proposed legislation) may invite unintended consequences for the ATEC and the system it oversees. The Accord did not recommend the abolition of the Higher Education Standards Panel, only that it should henceforth be supported by the ATEC.

The skillset required to advise on the Higher Education Standards Framework is highly specialised, highly technical, and informed by deep contextualised experience gained from inside the sector. The highly-specialised expertise that has resided within the Higher Education Standards Panel has been responsible for consistent, effective and careful stewardship of the Higher Education Standards Framework, delivering outcomes for students, staff, and the institutions themselves, and enabling a high degree of trust in the quality and standards of Australian universities. The Panel has conducted highly specialised work on matters such as:

- Admissions Transparency;
- Modes of delivery in higher education;
- Academic Credit Recognition; and
- Amending the Higher Education Standards Framework – Provider Category Standards.

RUN is concerned that the omission of a dedicated committee of expertise determining the Higher Education Standards Framework within the ATEC's legislative framework presents significant risks to the ongoing quality and integrity of Australia's higher education system. To address this RUN recommends establishing this Committee and enshrining its requisite skills in legislation.

*RUN recommends adding a clause to Division 5, 25 (2) to mandate the ATEC to establish a committee of expertise to determine the Higher Education Standards Framework. It is essential that the ATEC utilise a committee comprised of subject matter experts, who are required to consult with the tertiary education sector, to advise on matters relating to the Higher Education Standards Framework – including amending, subtracting or adding to the standards.*

## Functions of the ATEC

The following is related to Universities Accord (Australian Tertiary Education Commission) Bill 2025 Part 2, Division 2, Section 8, 11 Functions of the ATEC.

### *Issues for consideration*

RUN holds concerns that the ATEC will lack the independence it requires to provide robust advice to Government and to support the evidence-based decision-making and planning required of a world class higher education system.

As currently drafted, the ATEC would not be able to provide un-prompted advice on important or emerging issues of consideration to the Minister or to tertiary education sector providers and stakeholders. This limitation would deny the ATEC from performing its duties of sectoral stewardship in a robust and timely manner, and in particular from performing the role of 'promoting best practice' proposed by the Accord. RUN believes this to be a considerable shortcoming in the Bill, and in the fundamental design of the ATEC itself. The ATEC must be able to look at issues for consideration beyond those which are contemplated or requested by the Minister. RUN believes that an ATEC with the ability to provide direct and apolitical advice on important or emerging issues will ultimately enhance its ability to meet the National Tertiary Education Objective.

*RUN recommends amendment of Part 2, Division 2, Section 8, 11 (Functions of the ATEC) to enable the ATEC to provide the Minister with issues for consideration as it deems appropriate, meaning at its own discretion.*

### *Commonwealth contributions*

In Part 11 D (ii) the ATEC will be able to "prepare reports, and provide advice and recommendations if requested by the Minister to the Minister, in relation to:

- (ii) the efficient cost of higher education across disciplines and student cohorts and in relation to the Commonwealth contribution amounts for places in funding clusters."

While RUN supports this important function, the focus on Commonwealth contributions alone is limiting. At an undergraduate level, student funding is comprised of a Commonwealth contribution and a student contribution. Should the Bill embed an artificial and ongoing 'wall' between the consideration of these two funding components, there is a likelihood of unintended policy outcomes, particularly amongst cost-sensitive equity cohorts, the universities that enrol equity students in the highest concentrations, and the workforces into which they graduate. RUN believes that the ATEC would be more able to effect the objective of increasing equity student participation by having regard for not only the total quantum of per student funding, but also the components of it.

*RUN recommends amending Part 11 D (ii) to include the total per student funding including the Commonwealth contribution and Student contribution.*

### *Inclusion of research*

Research and research training is a core part of a university's activities and should therefore be a core part of the ATEC's remit. In setting mission-based compacts, RUN believes the ATEC ought to have regard to each university's unique research and research training missions. Likewise, in providing advice and expertise to the Minister, RUN believes the ATEC should have a dedicated remit to look at issues relating to research, particularly in the expectation that implementation actions will arise from

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the Government's response to the Strategic Examination of Research and Development.

*RUN recommends amending Part 2 Division 2 11 (Functions of the ATEC) to include a role for ATEC to provide advice on university research and research training at an institutional and a systems level.*

### *Inclusion of infrastructure*

RUN posits it would be sensible to have the ATEC hold appropriate powers to look at the infrastructure needs of Australia's universities both at an individual university level, as well as at a system level. Without this, RUN believes the equity objectives of the Australian Universities Accord would be weakened, and institutional compacts made more difficult to achieve, given the mixed capacity amongst Australia's universities to build or maintain critical teaching and learning (including digital) infrastructure during the ongoing absence of dedicated higher education infrastructure funding.

*RUN recommends amending Part 2 Division 2 11 (Functions of the ATEC) to include a role for ATEC in identifying the infrastructure needs of Australia's universities.*

### **Additional Commissioners**

Part 2, Division 3—The ATEC Commissioners.

Given the complexity and magnitude of the task before the ATEC, and the evolving nature of the higher education landscape, RUN believes the ATEC should have an increased number of Commissioners. Additional expertise will be particularly important during the initial 'start-up' years of the ATEC. RUN would urge additional commissioners to hold considerable expertise and experience in regional Australia, research matters, and/or equity participation matters. At a minimum, there should be a power to appoint, as recommended by the Accord "part-time or fractional commissioners ... to bring diverse experience to the Board".

*RUN recommends that the Bill be amended to empower the ATEC with the flexibility to adjust the number of Commissioners as it requires to meet evolving operational needs. In the event of additional Commissioners being appointed, the appointments should represent expertise in regional, research and/or equity participation matters.*

Furthermore, RUN recommends that, should the number of the ATEC Commissioners not be expanded, then overt regional experience and expertise be made an essential skillset within the existing composition of the ATEC Commissioners.

### **ATEC Staffing**

The ATEC will need to have staff with deep sectoral expertise in order to perform its role effectively. To this end, the ATEC needs to have the function of selecting its own staff, not only receive the staff that the Secretary confers on it after consultation, as currently provided in Part 2, Division 4 of the Bill.

*RUN recommends amendment of Part 2, Division 4 of the Bill to grant the ATEC the discretion to appoint its own staff to fill skills need as required.*

### **ATEC Stakeholder Consultations**

The Accord emphasised the importance of the ATEC working collaboratively and consultatively with the tertiary education sector. It recommended that "the Commission be established under legislation to work collaboratively with tertiary education institutions" and envisaged that the "Commission's stewardship role would see it work in close collaboration with a broad cross section of stakeholders in the tertiary education system" and would "work closely with the tertiary education sector and

other stakeholders in the evolution of the tertiary education system". As the Accord envisaged, the effectiveness of the ATEC depends on it being in close and regular consultation with its key stakeholders (such as those identified in Part 2, Division 2, Section 12). RUN believes that the ATEC's consultative requirements ought to be obligatory, rather than discretionary, as presented within the legislation.

*RUN recommends strengthening the requirement for the ATEC to consult with appropriate parties or invite submissions by amending relevant parts of the bill to change a discretionary 'may' to an obligated 'must' – specifically:*

- *Part 2, Division 2, Section 12*
- *Part 4, Division 3, Section 45, 3 (b) (ATEC Workplan).*

## **The National Tertiary Education Objective**

With regard to Part 2, Division 2, Section 13 of the Bill, RUN supports the principle of articulating a National Tertiary Education Objective as a fundamental aspect of the ATEC legislation. The Objective will play an important role in how the ongoing impact of the ATEC will be measured, to ensure it is providing effective stewardship of the sector, including success in increasing tertiary participation amongst traditionally underrepresented groups.

While RUN appreciates the need for the Objective to be broad in nature, RUN believes the current drafting of the Objective to be too socially and economically expansive such that its achievement relies on many factors beyond the ATEC's control. The National Tertiary Objective would be strengthened by including elements of direct specificity to higher education, research and equity inclusion that the ATEC may realistically be able to influence.

Australia's higher education sector is a system defined by a rich diversity of institutions and social missions, all of which play a critical role in advancing the distinct industries, communities, and economies that each provider serves. As such, the National Tertiary Education Objective – and the ATEC itself – must acknowledge and preserve this diversity, thereby avoiding any notion of a one-size-fits-all approach to sectoral stewardship.

*RUN recommends amending the National Tertiary Education Objective (Part 2, Division 2, Section 13 ) to include specific mentions to students, teaching and learning, research and research training. Furthermore, the Objective should make explicit mention of equity, participation and attainment, and of the need to acknowledge and preserve the institutional diversity that exists within the system.*

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