

**The University of Sydney, feedback on the Commonwealth Department of Education’s Needs-based Funding Implementation Consultation Paper, August 2024**

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**Executive summary**

The University of Sydney welcomes the opportunity to provide feedback on the Department’s Needs-based Funding Implementation Consultation Paper.<sup>1</sup> The University strongly supports the policy intent of increasing tertiary education attainment, particularly for under-represented cohorts: Low Socioeconomic Status (**Low SES**); First Nations (**First People hereafter**); people with disability, and those from Rural, Regional and Remote (**RRR**) areas. The University supports the Go8’s submission, which we have contributed to and seek to complement through our feedback.

Developing a Needs-based Funding System (**NBFS**) is a significant policy reform that should not be rushed due to the complexity of the issues and the high risk of unintended outcomes from poorly thought through policy. The NBFS should, as recommended by the Accord, be designed by the Australian Tertiary Education Commission (**ATEC**), in close consultation with First People, student representatives and expert practitioners in student equity; students with disability; academic support services; planning and finance.

The Accord conceived of Needs-based Funding (**NBF**) as part of an integrated package of reforms, which included boosting demand for tertiary education from school leavers, addressing the unfairness of the Job-ready Graduates Package (**JRG**) and improving the student income support system. The Department’s proposed model for NBFS would not comprehensively address these and other key barriers to participation for students from under-represented backgrounds.

Care is needed to develop consistent definitions for terms that will be used to determine student eligibility for NBF allocations and support (e.g., Disability, Low SES and Aboriginality), and to design and implement uniform data collection protocols across institutions for consistency and comparability. It is important to ensure that the students who are counted for NBF purposes and who are eligible to receive support under the NBFS truly belong to the targeted under-represented groups, avoiding misclassification and misallocation of scarce resources due to limitations in measurement methods that are well understood across the sector. There is also a need for sophisticated understanding of the factors driving providers’ delivery costs for different cohorts, settings, qualification levels and delivery models (face-to-face, online, blended etc). The ATEC should perform the critical preparatory work on definitions, costing, and NBFS design.

To be worth the effort of reform, any new NBFS will need to deliver additional funding overall to support growth in enrolments of students from the target groups and their success. We therefore

strongly welcome the proposal to allow total available funding to adjust to actual student enrolments, rather than the current approach of capped funding pools and provider allocations based on shares of enrolments.

The Government should decide student eligibility for any direct NBF financial support provided to assist students with living costs and provide such payments to eligible students through Centrelink or other appropriate agency, rather than have providers make these decisions and be responsible for administering such payments.

Each student has unique needs and reduced study load can be an indicator that a student faces significant challenges managing other commitments alongside their studies. Funding to support providers to deliver academic and other services to the target cohorts should follow each student and be allocated based on headcount, not Equivalent Full-Time Student Load (EFTSL).

The funding model should encourage students from under-represented cohorts to strive for excellent academic outcomes, both at school and in tertiary education. All eligible students from a cohort should receive the same level of funding support, irrespective of their ATAR or other measures of academic preparedness. Imagine if Australia's strategy for offering training and financial aid to Olympic and Paralympic athletes aimed only for them to qualify or reach the preliminary rounds, instead of striving for a place in the finals or winning a medal? Similarly, high academic achievers with significant physical disabilities may require technology and other accessibility equipment and infrastructure to support their continued success. Why should funding be any less for them because they have worked hard and are academically strong?

The NBFS should, as recommended by the Accord, be outcomes-focused and reward providers for improvements in their completion rates for students from the target cohorts.

Finally, the design of the NBFS should not conflate the worthy policy objective of ensuring providers with regional campuses are adequately funded, with the need to support the agency of students from under-represented cohorts to pursue their chosen study pathways.

## **Recommendations**

- In line with the Accord's findings and recommendations, allow the ATEC to lead the co-design of the NBFS in collaboration with First People, student representatives and expert practitioners in equity, disability, regional and remote student participation and success in tertiary education.
- To ensure integrity, transparency, fairness, and consistency in determining eligibility for NBF and allocating funds to providers and students, the Government, rather than tertiary education providers, should have responsibility for assessing student eligibility and making direct financial payments to students.
- Allocate funding to providers based on student head count, not EFTSL as proposed in the Paper, recognising the complex support needs of part-time students from under-represented backgrounds.
- Ensure that the NBFS supports all eligible students to realise their full potential and pursue excellence, by not reducing funding allocations linked to eligible students with higher ATAR or other measures of academic preparedness as suggested in the Paper.
- Separate consideration of the financial sustainability of providers' regional campuses from the student-focused NBFS, with ATEC to evaluate the effectiveness of the existing Regional Loading Program, including a detailed assessment of differences in the cost of regional and metropolitan provision in line with its proposed Independent Pricing Authority function.

## Responses to the issues covered in the Consultation Paper

### 1. The policy rationale for Needs-based Funding

The first section of the Implementation Consultation Paper (**Paper**) describes the purpose and some elements of the Department's proposed NBFS but does not clearly outline the findings and recommendations of the Australian Universities Accord that the suggested reforms are intending to implement.

Our analysis of the Accord's Final Report's findings on **Equity, Funding for Equity, Regional and Funding**, and of its recommendations **10 (Participation targets)**, **13 (Support to participate and succeed in learning)** and **39 (Regional tertiary education and communities)** suggests the Accord found a need for reform of the current funding system so that it:

- Is simpler, more coherent, transparent and easier to comprehend. **Funding, Rec 13**
- Better enables people from under-represented backgrounds to access and succeed in tertiary education, so that they have equal opportunity and for Australia to meet its future skills needs.
- Supports growth in tertiary education participation and success by people from low SES backgrounds, First People, people with disability and regional, rural and remote students. **Equity, Rec 10**
- Accurately reflects the additional costs of teaching students from under-represented backgrounds and of delivering courses in regional locations. **Funding for Equity**
- Recognises and supports the critical role that regional tertiary education providers play for the communities they serve - delivering local jobs, social and economic development. **Rec 39**
- Incentivises providers to enrol students from under-represented backgrounds and rewards providers that improve the completion rates of these students. **Rec 13**
- Ensures all universities make an equal effort to achieving the Government's targets for under-represented people, relative to each institution's different starting points and context. **Rec 10**
- Encourages providers to pursue evidence-based approaches to lifting the participation and success of people from under-represented backgrounds, by establishing an independent Australian Tertiary Education Commission (ATEC) which would, among other things, identify and disseminate successful approaches to attracting, preparing and ensuring success for students from under-represented backgrounds.
- Continues to require providers to report annually on their actions and progress toward increasing the participation and attainment by students from under-represented backgrounds. **Rec 10**

*University of Sydney summary of Accord Final Report findings and recommendations relevant to Needs-based Funding*

In our feedback on the Department's proposed model for implementing NBF, we have assessed the model primarily against the Accord Panel's recommended framework for reform of the current funding system.

We also provide the following feedback on proposals contained in this section of the Paper:

- It seems premature and risky for the Department to be pushing a particular model for implementing NBF before the ATEC is in place, given:
  - The pivotal role proposed (**p.2**) for the ATEC as the system steward and Independent Pricing Authority for the implementation of NBF as a core component of the proposed new Managed Growth Funding System (**MGFS**).
  - The clear need for decision-making on the NBF rates to be informed by reliable evidence of the additional reasonable costs of delivering successful outcomes for students from the different targeted under-represented backgrounds, those with 'cumulative disadvantage', courses in regional locations – combined with the current absence of good costing data covering any of these activities.
  - The stakeholder engagement and advisory function the Minister for Education has given the ATEC Implementation Advisory Committee in relation to the new MGFS, including NBF.<sup>2</sup>

- In relation to accurately quantifying the costs associated with teaching students from under-represented backgrounds and of delivering courses in regional settings, these are complex questions, which require time, expert research and extensive consultation to do well. We know from the [Transparency and Higher Education Expenditure](#) studies prepared annually for the Department by Deloitte Access Economics that *regionality* is one of at least four variables that have been found to be statistically significant drivers of differences in universities' delivery costs. Deloitte's latest publicly available report (published in 2022, covering 2019 and 2020) found that universities that operate predominantly in regional settings often face distinctive local contexts including: *'less readily available scale economies due to thin markets and lower populations; a higher share of distance or online learning; potentially lower per unit capital and/or labour costs; a greater need for student support as many regional universities may cater to a more disadvantaged student cohort'*. However, Deloitte also found that while regional universities' delivery costs for bachelor degree students were 10 per cent higher than metropolitan universities per EFTSL, for postgraduate students, regional universities' costs were about 8 per cent less when compared to metropolitan universities. **Clearly, the currently available data on differences in universities' delivery costs is inconclusive and needs to be researched carefully.**
- The Deloitte studies have found that universities' delivery costs may be influenced positively or negatively by factors including: scale of delivery; location; research intensity; jurisdiction; field of education; workforce makeup; and number of international students. Deloitte also emphasises that *'although universities with certain characteristics (e.g. regional universities may, on average, have different costs to the rest of the sector, this correlation could be driven by a range of factors other than purely input costs. For example, higher costs on average could be due to differences staff student ratios, scale effects or the need to provide additional support for students.'* We are not aware of the Deloitte costing exercises or any other studies that have accurately quantified the additional costs incurred by different providers delivering academic and support services to students from different under-represented backgrounds or to those experiencing the *'Cumulative Disadvantage'* described in the Paper. **These complex issues require detailed further empirical research, which should be led by the ATEC, once established, as part of its Independent Pricing Authority function.**
- The Paper stresses **(p.2)** the importance of properly identifying students who are eligible for NBF. We agree this is critical and urge the Department to not rush implementation of funding changes before the detailed work on definitions is completed for each of the targeted under-represented cohorts, with a plan and reliable data systems in place to ensure the integrity of the information that will be relied upon for NBF allocations and outcomes measurement. The Accord Final report discusses at length problems with definitions and data for under-represented students - focusing on the disability cohort **(Accord Final Report, pp.116-117)** and the potential for the Unique Student Identifier **(USI)** to improve the availability of individualised data throughout each student's educational journey from school **(Accord Final Report, pp.92-93)**. There are longstanding concerns<sup>3</sup> about the continuing appropriateness of the current post-code-based definition of Low SES ([lowest 25 per cent in Australia according to the ABS Index of Occupation](#)) because by design it misclassifies some individuals from higher SES families who happen to reside in a lower SES statistical collection district, while excluding students from many communities that have equally low higher education participation rates. The NBF system also needs to be able to recognise and accommodate the needs of students who develop disadvantage post-enrolment (e.g. acquire a health condition or disability). As proposed, the NBF is focused on the disadvantage apparent at the time of application to study. There is also a vital need to ensure national consistency in the definition used for a student to be counted for NBF under the First People's cohort and *'Cumulative Disadvantage'* for students who fall into more than one of the targeted under-represented cohorts. **Again, resolving these questions requires detailed research and consultation to occur before major changes are made to the current funding system.**

- We query the logic and desirability of the proposal **(p.1)** that the per-student funding amount of NBF will be calculated based on Equivalent Full-Time Student Load (EFTSL) rather than headcount. We note this would represent a departure from the approach for allocating grants under the Higher Education Participation and Partnership Program (**HEPPP**), which uses headcount. Moreover, students from the targeted under-represented cohorts are more likely to be studying reduced loads and those enrolled this way are more likely to have complex needs that require additional support, which adds to providers' costs.
- We query the proposal **(p.1)** that NBF will only be provided to Table A providers. Any provider enrolling Commonwealth-supported students from the targeted under-represented groups should be eligible given the Government's 80 per cent tertiary education qualification attainment target by 2050.
- Regarding the proposal **(p.1)** that a per-student funding amount will be provided for all Commonwealth-supported students studying at a regional or remote campus of an eligible provider, we note that this already occurs under the Regional Loading Program (**RLP**). The Paper does not mention this program, or its adequacy in meeting the additional costs of regional provision. **The ATEC should independently evaluate this program as part of its work to identify and confirm the reasonable additional costs incurred by providers delivering courses in regional locations, including to students from the targeted under-represented cohorts.**
- The Paper states **(p.1)** that the policy intent is for funding to flow more seamlessly than currently by *'following the student'* and that it *'would be used primarily for the benefit of students within the identified cohorts'*. However, it later proposes **(p.3)** that the funding is for *'providers to fund activities that support student success in the target equity cohorts. It would not be funding for individualised student plans'*. Yet, elsewhere in the Paper **(pp.2-3)** and in both attachments it is clear the provision of direct financial support to students through scholarships and bursaries is contemplated and that there will be an expectation that providers use NBF for activities that are additional to those in place currently and funded through existing programs **(p.3)**. The Department should reconsider or clarify the extent to which NBF can be used to provide direct financial and other support to individual students from the target cohorts.

## 2. Key elements of Needs-based Funding

We understand the key elements of the Department's proposed NBFS to be:

- Per-student funding contributions, which could be scaled by academic preparedness, would be provided to support:
  - **Low-SES students, First People students and students with disability**, in recognition that these students often need additional support to succeed at university
  - All students **studying at regional campuses**, recognising the higher costs regional providers face to deliver courses in regional Australia.
- Providers would be able to **invest in direct, academic and inclusion, and indirect student supports** that help students to complete their degrees. They would not be able to use the funding for individualised student plans or to deliver any goods or services they are already providing.
- Funding contributions could be **allocated on a per-student basis** to providers for each eligible student (EFTSL basis), with total funding responding to changes in identified cohort enrolments.

Consultation Paper, pp.2-3

## Responses to consultation questions

### Eligibility for Needs-based Funding

- **What could Government consider when setting eligibility for Needs-based Funding within the identified cohorts?**

As noted above and stressed in the Paper (p.2) it is critically important for eligibility for NBF to be based on clear definitions that are fair, easy to understand and for which accurate data sets are available, or can be developed cost-effectively. It has long been understood that the definition for Low SES used widely for higher education purposes continues to misclassify some individuals. The current definition is statistical, not individual, and out-of-date by the time updates are released (e.g. the Low SES areas released in 2023 are based on 21 census information). We agree with the Grattan Institute that a *'balance is needed between precision and practicalities'* when it comes to identifying and measuring relative socio-economic advantage.<sup>4</sup> However, as we argued in our submissions to the Accord Panel and as it discussed in its Final Report, the rollout of the Unique Student Identifier (USI) combined with advances in data integration and sharing between Commonwealth agencies, should provide an opportunity for Australia to move towards a more nuanced and sophisticated approach to determining an individual's actual socio-economic status. There is also a vital need to ensure national consistency in the definition used for a student to be counted for NBF for the First People's cohort, for Disability and for *'Cumulative Disadvantage'* for students who fall into more than one of the targeted under-represented cohorts. However, students should only be required documentation of evidence once, not time and again to different providers throughout their tertiary education journeys.

### Needs-based Funding contribution amounts

- **How could contribution amounts consider the concept of cumulative disadvantage, where a student belongs to more than one identified equity group?**

Answering this question requires detailed further empirical research, which should be led by the ATEC, once established, as part of its Independent Pricing Authority function. As noted above, we are not aware of any recent comprehensive research that has accurately quantified the additional costs incurred by different providers delivering academic and support services to students from different under-represented backgrounds, or to those experiencing the 'cumulative disadvantage' described in the Paper. The annual Transparency in Higher Education Teaching exercises undertaken by Deloitte have considered the issue but not at the level of detail required for Government to rely on the data to inform decisions about average cost and funding relativities between the targeted cohorts and for students that are members of more than one identified group.

### Potential scaling and proxy for academic preparedness

- **What are the effects of academic preparedness on student outcomes in higher education? How could these be reflected in the approach to scaling of per-student Needs-based Funding?**
- **Would ATAR be an appropriate proxy for academic preparedness? How could academic preparedness best be measured where a new student does not have an ATAR?**
- **How would a system of scaling for academic preparedness interact with Needs-based Funding contributions which are used for direct student supports?**

Intuitively, it may seem sensible to argue that a student with a higher ATAR needs less direct and indirect support to succeed because the data show a positive correlation between higher ATARs and completion rates. However, we strongly caution against such a model for three key reasons. First, the proposal fails on the Accord's objectives of making the funding system simpler and easier to comprehend. Second, such an approach would signal to students belonging to the specified groups, as well as to providers and the community, that achieving just the basic required standards is the only expectation for students coming from these backgrounds. Third, this approach would risk



preventing high-performing students from under-represented backgrounds from realising their full potentials – for example by having to spend more time on paid work to meet living costs compared to their fellow students whether eligible for NBF or from higher socio-economic backgrounds.

While we need to be sure that all students identified as eligible for support under one or more of the targeted under-represented groups are genuine (e.g. not students from high SES families counted in Low SES cohorts because of the limitations of the ABS post-code measure) the same level of funding support should follow all genuine eligible students regardless of their ATAR etc.

**Imagine if Australia’s strategy for offering training and financial aid to Olympic and Paralympic athletes aimed only for them to qualify or reach the preliminary rounds, instead of striving for a place in the finals or winning a medal? Similarly, high academic achievers with significant physical disabilities may require technological and other accessibility tools/infrastructure to support their continued success. Why should funding be any less for them because they have worked hard and are academically strong?**

### **3. Providers would be required to invest in evidence-based activities that support students to complete their degrees**

We understand the key elements of the Department’s proposed compliance requirement for providers in receipt of NBF to be:

- Providers would be required to invest Needs-based Funding into direct, academic and inclusion, and indirect student supports for the primary benefit of students from the identified cohorts, to help them complete their degrees.
- These activities would be specified in a *Framework of Equity Support Activities*, which would be stewarded and refined over time by the ATEC, with scope allowed innovative models of equity support within the *Framework*.
- Providers could be required to outline a plan for using Need-based Funding contributions in their Mission-based Compacts.
- Providers would be required to report at the end of each year on how Needs-based Funding contributions have been used to achieve positive equity outcomes and the types of supports provided to students. These reports will be acquitted against the *Framework*.
- A provider’s performance in delivering Needs-based Funding activities may be used to inform the operation of other parts of the system, including when assessing request for additional managed demand driven places for equity students, setting Managed Growth Targets and negotiating Mission-based Compacts.

Consultation Paper, p.5

### **Responses to consultation questions**

#### **Framework of activities**

- **What types of supports could providers be able to use Needs-based Funding for, including direct, academic and inclusion, and indirect supports?**
- **Should there be guidance on how funding is split between direct, academic and inclusion, and indirect student supports?**
- **Would an outcome-based framework for funding accountability be more effective than a Framework of Activities? How could this work?**

#### **Developing an evidence-based framework for Needs-based Funding activities**

- **How could the system, including the ATEC, provide scope for innovation, encourage the trialling of new student supports, and share best practice?**

- **How could Government develop high-quality evidence and strong accountability mechanisms for outcomes that demonstrate support is effective and fit-for-purpose?**
- **How could the Framework reflect activities targeted at supporting completion and be sensitive to different stages of a student's study, for example high attrition in the early years of study?**
- **How could student support activities differ for students from alternative entry pathways, for example mature age students or those that enter via preparatory courses.**
- **How could Needs-based Funding support successful transition into further study or employment?**
- **How could Government leverage existing expertise, especially through the Australian Centre for Student Equity and Success (ACSES), to enable innovation and grow the evidence base?**

The range of evidence-based interventions outlined in the Paper's Attachment A and Attachment B cover the ground sufficiently and the Paper's indication that the Framework will provide flexibility for providers to innovate by trialling new approaches is welcome.

We strongly believe it should be left to individual providers to determine how they allocate available funds rather than the Department or ATEC, recognising that each provider's student cohort, and financial and operating context is different and that there will also be new annual reporting requirements that will replace those in place for existing related programs.

Regarding the merits of an outcomes-based framework for funding accountability compared to reporting against a Framework of Activities, a mixed approach may be preferable, at least for the first 3-5 years of Needs-based Funding. The Mission-based Compacts have historically included performance-based funding elements, with different providers agreeing to different performance metrics and targets based on their current standing, individual challenges and priorities, rather than a one-size-fits-all approach. This approach is conducive to accepting and supporting provider diversity as a desirable trait for the sector.

The Accord Final Report recommended (**Rec 13**) that the Needs-based Funding model include a performance bonus for providers that meet agreed completion targets negotiated through their compacts and we note that the Department's proposed model does not include such a mechanism. If there are concerns about risk to academic integrity of introducing such bonus payment for providers, consideration could be given instead to paying bonuses direct or indirect to each eligible student upon completion of their course requirements.

#### **Delivery organisations and other programs**

- **What types of organisations would be suitable to deliver the support activities for identified student groups, including students studying in regional campuses?**
- **What would be the role of First Nations-led organisations in delivering services to First Nations students and other students?**
- **How could the Indigenous Student Success Program (ISSP) and Higher Education Participation and Partnerships Program (HEPPP) inform the proposed Needs-based Funding system? What elements of these programs should be adopted to a new Needs-based Funding model? What elements should not be adopted?**

Partnerships play a critical role in reaching future students, their parents/carers and the community within under-represented cohorts. Partners; community organisations; NFPs; VET; and other educational providers enable universities to reach future students who would not traditionally be considering university. Funding provided through the HEPPP has been vital in facilitating these partnerships and should be continued as part of the NBFS. Similarly, partnerships with high schools and high school outreach programs funded by HEPPP are vital for raising aspiration and providing access to university.



However, HEPPP funding is inadequate to make significant shifts in access, participation and success rates alone. The cost to engage students from under-represented cohorts, across large geographical areas is significant, not to mention the systemic and cultural shifts that will be needed to change the perception of university in their community and significantly grow participation rates.

Significant funding needs to be invested into schools at the primary and high school level to raise capacity and aspiration for both the child and their parents/guardians throughout schooling. This funding needs to be ringfenced, much like HEPPP to ensure it is not absorbed into schools' general operating budget.

Currently, HEPPP funding is intended to cover the whole student lifecycle, from future student to graduate. With specific funding provided to disadvantaged schools raise capacity, universities should continue to utilise HEPPP to raise aspiration and access, with NBF focused on supporting student success in tertiary education. All these stages need specific approaches, with outcomes-based and performance measures put in place to reward and hold providers accountable for performance.

#### **4. Total Needs-based Funding could vary in line with student numbers**

We understand the Department is considering an allocation model for Needs-based Funding determined on a per-student basis for each eligible student, with total funding responding to changes in identified cohort enrolments. The stated policy rationales are to (i) ensure that all eligible students from identified cohorts are supported to participate and succeed in their studies and (ii) achieve allocative efficiency by ensuring providers only receive funding for the students they enrol from the targeted under-represented groups and (iii) provide greater incentives that exist under the current funding arrangements for providers to enrol more students from the target cohorts.

#### **Responses to consultation questions**

##### **Improving data to better understand student demographics and recognise eligibility**

- **How could Government improve the quality of data collection and analysis across the sector, to accurately recognise eligibility for Needs-based Funding and enhance understanding of the experience of identified cohorts in higher education?**
- **What data do we need to ensure providers receive appropriate funding for identified cohorts who need additional support and so providers can design and deliver appropriate supports?**
- **Are current practices of data collection adequate? What could universities improve in collecting student data?**

Improving the quality of data definition and consistency across the higher education sector will be crucial for accurately recognising eligibility for needs-based funding and understanding the experiences of identified cohorts. Data availability will also likely negatively impact student experience as they aim to progress through the enrolment process and encounter delays associated with confirmation of eligibility. Several strategies the Government could employ are outlined below:

##### **Standardised Definitions and Data Collection Methods**

Develop and enforce consistent definitions for key terms related to equity and needs-based funding eligibility (e.g., disability, low SES, Aboriginality).

Implement uniform data collection protocols across institutions to ensure data consistency and comparability.

Importantly consider the definition of low SES (with current SA1 address being a poor indicator of actual SES status). A move to address of an applicant's high school may serve as a better indicator of educational disadvantage. Standardise the use of address data for determining equity status,

such as using high school addresses and High School ICSEA (Index of Community Socio-Educational Advantage) for consistency.

Disability status is currently self-identified and covers a range of disabilities that may have vastly different impacts on students' abilities to participate in higher education. Enhanced methods are needed for identifying and categorising disabilities, recognising the diverse impacts different disabilities may have on students' participation in higher education.

There are complex considerations about the documentation required, the severity and the amount of support required, which is all individual. Research is needed to understand the government resources, systems, and organisations that already have this information, so that it can be utilised safely to ensure consistency across the sector to minimise the reporting burden for students.

Ensure that address data is used consistently across institutions and aligns with other data sources.

### **Enhancing the Tertiary Collection of Student Information (TCSI)**

Ensure that TCSI is fully functional and effectively integrates data from various government systems.

While arguably it may make more sense for the government department which already holds much of this data (Department of Social Services) to administer this funding, if it is indeed Higher Education Providers who need to do so, sharing of data will be a critical enabler.

Provide training and resources to institutions to maximise the potential of TCSI for accurate and comprehensive data collection and analysis around equity students.

### **Improving data integrity**

Develop and implement robust verification processes for confirming eligibility, preferably before or during the enrolment process. In implementing these processes, consider the speed at which admission decisions are made and the importance of administering offers to applicants as early as possible.

Any data that is self-reported by the student is problematic. It is often not updated in a timely way (e.g. if it changes over the course of their candidature) and may be difficult to verify.

### **Addressing administrative burden**

Streamline data collection processes to minimise administrative burden and avoid delays in admission.

Invest in digital infrastructure and automation to facilitate efficient and accurate data collection and analysis at both sector and institutional level.

### **Ongoing evaluation and improvement**

Establish a continuous feedback loop with institutions to identify and address data quality issues.

Regularly review and update data collection and analysis methods to adapt to evolving needs and challenges.

## **Endnotes**

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<sup>1</sup> <https://www.education.gov.au/australian-universities-accord/accord-202425-budget-measures/post-budget-implementation-consultation-papers>

<sup>2</sup> <https://ministers.education.gov.au/clare/responding-australian-universities-accord>

<sup>3</sup> <https://grattan.edu.au/news/the-case-for-redefining-low-socioeconomic-status-in-higher-education/>

<sup>4</sup> <https://grattan.edu.au/news/the-case-for-redefining-low-socioeconomic-status-in-higher-education/>