

Australian Tertiary Education Commission Consultation Paper

Submission to
the Department
of Education

July 2024



THE UNIVERSITY OF
MELBOURNE



Introduction

The University of Melbourne welcomes the opportunity to respond to the Australian Tertiary Education Commission (ATEC) *Implementation consultation paper* to inform the Government's decisions on the design and implementation of the ATEC.

Our tertiary education system will need to undergo massive growth and change in the coming years and decades if it is to expand access, and to generate the skills and capabilities needed to maintain Australia's economic competitiveness. The University notes this was core to the Universities Accord's final report and welcomes the government's ambition to respond to this challenge.

The model proposed in the consultation paper will struggle to deliver on its proposed accountabilities because it is too broad in its remit, would exclude experts with recent experience from being employed by the Commission and would, in essence, be a Committee of the Department of Education rather than an independent, statutory body charged with providing policy advice to government. Legislation must ensure clear lines of independence and delineation of the relationship with and responsibilities between ATEC, sector regulators and the Department to prevent duplication, additional regulatory burden and dysfunction.

In the University's view the ATEC should be a high-level, strategic, policy advisory body that provides expert policy advice to government, based on deep knowledge of the sector, contemporary research and evaluation and understanding of the practical implications of its advice:

- It would develop its advice through regular and genuine consultation with experts, other relevant portfolios and agencies, the sector and stakeholders.
- It should gather, analyse and publish data, focused on outcomes rather than inputs, in order to monitor the overall health of the higher education ecosystem, and to hold institutions accountable through more transparency.
- It should undertake long-term system planning to support institutional diversity, carry out regular pricing exercises, broker and approve mission-based compacts and monitor ongoing system performance, particularly in widening participation.
- The ATEC should advise on and devise regulatory reforms needed to facilitate the emergence of system diversity embracing different types of institutions and to forge stronger, but historically elusive, connections and pathways between universities and the VET sector.
- The University envisions a body that would monitor the progress of implementation of the endorsed Accord recommendations and steward reform through the weight given to its evidenced-based policy by the sector, the community and by government, with the Department responsible for implementing Government policy derived from ATEC advice and policy design.

Achieving the outcomes envisaged by the Accord will require government and its agencies, the sector and stakeholders to work together in good faith with a shared understanding of outcomes. The ATEC has the potential to play a seminal role but its governance, remit and clearly defined accountabilities will be key to achieving this.

A revised proposal for the ATEC should be issued following consultation to better set it up for success. Only after that should an exposure draft of the enabling legislation be released for consultation and well before it is introduced into the parliament.

The University offers its suggestions in the spirit of constructive engagement in what will be a systemically important reform. For further information or to discuss the submission, Professor Gregor Kennedy, Deputy Vice-Chancellor (Academic) can be contacted at gek@unimelb.edu.au.

ATEC Objectives and Purpose

The University welcomes the adoption of a legislated objective for ATEC as a formal and enduring way to embed the ATEC's role in the tertiary education system. Legislating objectives will help ensure that the ATEC's work remains focused on the national interest and transcends political or sectoral interest. Wording that draws from the National Tertiary Education Objective is appropriate, and the University is supportive of the objectives proposed in the consultation paper that centre on equitable opportunity, a productive economy and a strong civic democracy.

Legislation ensures that the ATEC is established with parliamentary scrutiny and oversight and cannot be dissolved without its agreement. Legislation should also establish ATEC's statutory independence, a core strength, and codify the Minister's powers to ensure transparency in practice.

Legislating this objective should not preclude ATEC acquiring other more explicit goals, as long as they are aligned with this overall objective, for example a goal of increased system diversity. These aligned goals could be at the instigation of the Commissioner or after a recommendation by the Minister, if the Commissioner decides that these other goals contribute to the legislated objective.

The proposed objective is followed by a proposed section setting out, at a high level, how ATEC would achieve this purpose – the approaches it will take. This includes facilitating a strong, dynamic and efficient tertiary education system, fostering collaborative and purposeful work between stakeholders, and working with other relevant agencies to identify skills needs, and enhancing collaboration between Commonwealth and the States. The University also recommends a point which emphasises that ATEC will seek to achieve this purpose by conducting and commissioning higher education policy research to inform policy and program initiatives.

Recommendation 1: In legislation include in the Objectives that ATEC will conduct and commission research to inform its work in developing policy advice and in stewarding the higher education sector.

ATEC features and functions proposed in the consultation paper

The consultation paper proposes that the ATEC would hold important administrative and executive powers. It would lead and manage Australia's higher education system, and be responsible for providing stronger governance, rigour and oversight of public funding for higher education in Australia. Its proposed functions are ones which would typically be held by a government department.

The consultation paper also proposes that the Minister for Education would have statutory powers to direct the ATEC on particular matters, although how specific these powers of direction would be is unclear. Structurally, the Department Secretary would be the accountable authority for ATEC's annual and financial reporting, with the ATEC being a program area within the Department of Education. It would also be physically located in the Department, and leverage the Department's 'physical, digital, and corporate footprint'.

The proposed appointment criteria for the Commissioner suggests concern about sectoral capture and a preference for leadership experience in the public service over leadership experience in the tertiary sector.

While the University welcomes the ambition to drive reform inherent in these functions and operational features, they describe a body which is closely integrated into the Department and politically responsive to government. As such it may be constrained by the preferences of the government of the day rather than taking a longer-term view about the evolution of policy settings. This carries the risk that policy options become narrower, focused primarily on immediate priorities, and only surfaced where they are consistent with the prevailing interest of government. The Accord identified these issues as a key weakness in the current system.

Recommendation 2: The ATEC should be established as a statutory body, reporting directly to the Minister and fully independent from the Department of Education and regulatory agencies. It should actively recruit from outside the Department.

Suggested features of the ATEC model

The University proposes a governance structure, design and remit which would more definitively establish the ATEC's statutory independence and provide a foundation for sector leadership and policy influence - an advisory role similar to that of the Productivity Commission.

It would not undertake day-to-day operational policy or program management functions, nor would it allocate funding to the sector. The Department and the Minister would maintain key decision-making functions, including in relation to funding within an overall envelope and policy and program management.

The Productivity Commission's effectiveness in public debate and policy formulation rests on three key features:

1. **Independence:** It operates independently under its own legislation, governed by appointed officials including the Chair and Commissioners, and has its own budgetary allocation and staff.
2. **Transparency:** The Commission's advice to government, and the information and analysis on which it is based, are all open to public scrutiny.
3. **Community-wide perspective:** The Commission is obliged under its statutory guidelines to take a broad view, encompassing the interests of the economy and community as a whole, rather than just particular industries, sectors or groups.

The University proposes a model with similar features of independence, transparency, expertise and community-wide perspective for the ATEC.

Recommendation 3: In designing the ATEC the essential features of independence, transparency, and community-wide perspective, supported by sector expertise should be incorporated.

ATEC functions enabled by extensive sectoral and policy expertise

Underpinned by the operating features described above, the University envisions a body which would build a deep well of sectoral knowledge and policy capability, working constructively with the sector. It would drive system improvements by providing quality, independent, transparent advice and information to government, and by gathering data, convening the sector, and communicating ideas and analysis to the sector and community. In all its advice it would focus on its legislated objectives and other long-term strategic goals which contribute to these, such as tertiary education sector growth through equity, enabling system diversity, foregrounding shifts in the workforce, and ensuring skills needs are met.

Under this model, the ATEC would be well-placed to provide the high-quality strategic policy advice and system planning and regulatory advice which will be needed to achieve the government's specific policy goals. For example, were it established prior to the implementation of the proposed Managed Growth Funding and Needs-based Funding systems, the ATEC could provide advice to ensure these new systems are designed to achieve their goals and can be practically implemented. It could also monitor implementation and provide advice on refining these systems once they are operating. A system that will be required to deliver a massive increase in access will need to create many more and diverse institutions. The ATEC could have a key role in stewarding that development.

The government would largely determine the ATEC's work program through the Minister's Letter of Expectation, including referring public inquiries to it, although it would also be able to initiate its own research and policy papers. The ATEC could also commission respected think tanks to undertake reviews and develop policy advice to ensure policy contestability and to engage expertise where it resides. ATEC could steward a network of higher education policy experts including engaging with organisations such as the Centre for the Study of Higher Education, The Mitchell Institute, James Martin Institute for Public Policy, and

The Australian Centre for Student Equity and Success, for example. The ATEC could also convene time-limited, issue-focussed policy working groups as needed.

Policy advice could also be commissioned by other bodies, for example the Skills and Workforce Ministerial Council and/or the Education Ministers' Meeting in relation to harmonising tertiary education policy. Given its expertise, and with State participation in its Advisory Board (mentioned below) and interjurisdictional working groups, the ATEC would be well-placed to advise on harmonisation of tertiary education policy, and steps to achieve this, but to be successful there would need to be engagement from all jurisdictions.

Productivity Commission inquiries, regardless of whether the recommendations are adopted, assist government policy making through the information gathering, public participation and scrutiny of different proposals and ideas that the inquiry process stimulates. Sometimes proposals that were not accepted initially have been implemented after an interval. An ATEC, as the University proposes, would provide similar benefits to government and the community.

It will be essential to ensure that the remit of ATEC is clearly defined to avoid imposing another layer of regulatory burden that duplicates that of the Department and TEQSA. ATEC's relationship with, and regulatory independence from the Department and TEQSA needs to be clarified.

Recommendation 4a: Resource the ATEC sufficiently to enable it to build a deep well of sectoral knowledge and policy capability, to enable it to provide evidenced-based, independent, transparent advice and information to government, to inform policy making.

Recommendation 4b: ATEC to be specifically authorised to conduct and commission research to inform its work facilitating the development of higher education policy settings.

Other functions for the ATEC

The University of Melbourne envisions ATEC holding several other functions.

Sector engagement: The University welcome's the consultation paper's vision of a consultative body focused on collaboration with the sector. The ATEC should facilitate engagement with the tertiary education sector as a trusted independent policy body. Good policy is produced through deep and long-term engagement with the sector.

Engagement across government: The University welcomes the consultation paper's description of an ATEC that is empowered to engage broadly with different portfolios and levels of government as required. This will be essential to build trust in the ATEC as an objective, transparent and independent advisory body with a wide scope, particularly as it develops policy advice in relation to cross-jurisdictional issues, such as establishing greater alignment between the higher education and VET systems.

Recommendation 5: Require ATEC to engage closely and regularly with the sector and across government through the establishment of formal mechanisms for this purpose.

Pricing: The University generally agrees with the consultation paper in relation to pricing. In the University's vision, while the Department would retain control of final decisions on pricing, an important ongoing function of the ATEC would be as a pricing authority for the higher education sector. As a first order priority the University envisions the ATEC undertaking a new independent pricing exercise focused on identifying the true costs of delivery in a consistent and comparable way to replace the flawed pricing exercise undertaken by Deloitte Access Economics. This is a fundamental foundation for policy development and design, which should take into account how different types of higher education institutions have different cost profiles.

Recommendation 6: Task the ATEC with undertaking a regular independent pricing exercise focused on identifying the true costs of delivery.

Compacts: The University agrees that Compacts have the potential to play an important role in driving reform. However, rather than negotiating the Compacts, in the University's vision the ATEC would play a convening and brokering function for Compact negotiations between government and individual higher education providers. The ATEC, with its deep sectoral knowledge, sector-wide perspective, and focus on long-term objectives would be able to provide valuable input into these negotiations. It could, for example, publicly table its views on how an individual university's strategies fit with and contribute to explicit long-term goals, such as targets for tertiary education attainment. Similarly, it could publicly table views as to an appropriate Managed Growth Target for each university. In Compact negotiations the ATEC, as the independent, objective convenor, would be the authority on long-term sectoral and national goals and for guiding individual Compacts towards these, based on the missions of each institution.

To fulfil its proposed role as the system 'steward' the ATEC could also potentially 'approve' Compacts, similar to the way that the Fair Work Commission (FWC) must approve enterprise agreements before they can come into effect. Whereas the FWC must assess whether each employee will be better off before it approves an agreement, the ATEC could assess whether a Compact contributes to the National Tertiary Education Objective or other defined long-term goals based on that objective, and enables institutions to pursue their missions.

Recommendation 7: Legislate to make the ATEC the convenor of Compact negotiations between institution and Department and require the ATEC to approve Compacts and maintain a public register of all approved Compacts.

Monitor system performance: The University agrees that the ATEC should have a role in monitoring system performance through the collection of institutional performance data. The University supports the consultation paper recommendation that the ATEC would prepare an annual *State of the Tertiary Education Sector* report. The University also supports the Universities Accord recommendation for a rolling triennial *Future of the Tertiary Education Sector* report that would be informed by the annual reporting.

Better timely and public data, focusing on outcomes rather than inputs, would enable the ATEC to play a role in holding the sector accountable, encouraging quality outcomes, and informing government policy making. This will require an overhaul of existing data collection and associated IT platforms, noting that there is currently a significant time lag of two years between the higher education data collection and its release by the Department. The ATEC's deep sectoral knowledge, and sectoral engagement will be essential in the design of systems which enable data to be gathered, while ensuring minimal additional regulatory burden on the sector.

Recommendation 8: Legislate to require the ATEC to prepare an annual *State of the Tertiary Education Sector* report and a rolling triennial *Future of the Tertiary Education Sector* report. ATEC should drive the development of a fit-for-purpose data collection system to streamline data collection across ATEC and the Department.

Research policy: The University notes that although it refers to 'facilitating the production and application of new knowledge', research is not explicitly mentioned in the proposed objectives for the ATEC to be included in the new Act as outlined in the consultation paper. The University supports the decision to keep ARC separate from the ATEC, however the University is open to the ATEC developing expertise on and providing advice in relation to research policy. This would require cross-portfolio engagement and a wider perspective than the tertiary education sector.

Recommendation 9: Resource the ATEC sufficiently so that it has the expertise to develop and provide advice in relation to whole-of-government research policy.

First Nations: The University welcomes the importance placed on centring First Nations issues in the consultation paper and supports the ATEC having an important cross cutting function of strengthening First Nations representation and self-determination, facilitated by the First Nations Commissioner and First

Nationals Council. The ATEC should ensure connectivity with the ARC Indigenous Forum to ensure coordinated, cohesive policy development.

Recommendation 10: Ensure that the importance of First Nations representation and self-determination is recognised in ATEC’s work including by the appointment of a First Nations Commissioner and the establishment of a First National Council.

AQF review monitoring: Given its anticipated expertise the ATEC could also play a role in overseeing and monitoring the implementation of the Australian Qualifications Framework Review. This would require appropriate staffing and resourcing.

Recommendation 11: Consider tasking the ATEC with overseeing and monitoring the implementation of the Australian Qualifications Framework Review.

Monitoring implementation of the Accord: Given its anticipated expertise the ATEC would be well placed to monitor the progress of the implementation of Accord recommendations. It could have an ongoing brief to assess the effectiveness of policy design, its practical application and the outcomes delivered.

Recommendation 12: Task the ATEC with monitoring the implementation of the Accord.

University of Melbourne’s proposal for the initial division of functions between the ATEC and the Department of Education

ATEC	Department of Education
<ul style="list-style-type: none"> • Strategic higher education policy advice • Strategic tertiary education policy advice, for example where the Skills and Workforce Ministerial Council has commissioned the ATEC to do so • System planning and advice on regulatory reform to enable the establishment of diverse institutions and innovative curriculum design and delivery • Conducting and commissioning research to inform higher education policy development • Convening and brokering mission-based compact negotiations between universities and Department, while also providing advice • Assessing and approving compacts and maintaining a public register of compacts • Pricing authority for the higher education sector • Facilitating wide engagement with the tertiary education system • Strengthening First Nations representation and self-determination • Overseeing and monitoring the implementation of the Australian Qualifications Framework Review • Accountability, quality and performance • Improving data and metrics to inform government policy making • Monitoring implementation of the Accord 	<ul style="list-style-type: none"> • Operational policy and program management • Negotiating and agreeing mission-based compacts with universities (with the ATEC convening and brokering negotiations) • Funding allocation for the higher education sector • International education (with the Department providing advice to the ATEC on the sector’s impact on system planning and vice versa)

Governance

The ATEC governance arrangements should ensure its statutory independence and embed oversight and consultation into its processes.

The University supports the Minister for Education determining an annual Letter of Expectations for the ATEC. To maintain the ATEC’s independence, other than being able to refer inquiries to it, the Minister

should only be able 'to direct ATEC on particular matters' in general terms. Similarly, legislation should require transparency with regards to all ATEC processes, including making public all data, reports and advice to government and any government 'direction' to the ATEC.

The Treasury Portfolio has a Portfolio Budget Statement (PBS) outcome for the Productivity Commission which emphasises its role in providing independent and transparent analysis from a community-wide perspective. A similar Education portfolio PBS outcome for the ATEC would be appropriate to ensure oversight, while maintaining independence.

Recommendation 13: To maintain the ATEC's independence:

- The Minister should be able to direct the ATEC in an annual Letter of Expectations, and otherwise only in general terms.
- Legislation should require transparency with regards to all the ATEC processes, including making public all data, reports and advice to government and any government 'direction' to the ATEC.
- An Education portfolio *Portfolio Budget Statement* should emphasise the ATEC's role in providing independent and transparent analysis from a community-wide perspective.

Proposed structure

The University welcomes the consultation paper's recognition that the ATEC will need strong and independent leadership, supported by skilled and capable staff. The University is also supportive of the ATEC structure proposed in the paper - a Chief Commissioner assisted by two part-time Deputy Commissioners, and a part-time First Nations Commissioner, supported by a CEO and staff delivering the ATEC's functions.

The University agrees that the commissioner positions must be held by people who can demonstrate their independence from the tertiary sector. But the University rejects the idea that a person who has held a leadership position in the tertiary sector within a set number of years would not be capable of demonstrating their independence or ability to work in the national interest. For the ATEC to be successful the commissioners will need an intimate understanding of the sector. The fact that a person has worked in the sector previously does not mean they will be 'captured' by it. Were such restrictions put in place it would inevitably limit the number of candidates with relevant expertise available to fill these roles. The usual safeguards against conflicts of interest combined with a transparent appointment process would suffice to prevent that person being 'captured' by the tertiary sector. Similarly, safeguards should be adopted to prevent 'departmental capture' of the ATEC.

Recommendation 14: Commissioner roles should be appointed, via a transparent and independent process, on the basis of experience with the tertiary sector and the constituency area they are appointed to lead. Staff of the ATEC should similarly be experienced in higher education policy and have had experience in the sector.

The University agrees that the ATEC Commissioners should draw on the expertise of other officials, including but not limited to, the Regional Education Commissioner, the Australian Research Council (ARC) board chair, the Tertiary Education Quality and Standards Agency (TEQSA) Chief Commissioner, the Australian Skills Quality Authority (ASQA) CEO and the Jobs and Skills Australia (JSA) Commissioner. This should be legislated as a formal **Advisory Board** and regular consultation with these and other relevant government stakeholders should be required under the legislation. The Advisory Board should also include a select number of policy experts and sector leaders with deep sector knowledge who can provide insights into the practicality of proposed policies. To maximise harmonisation between the tertiary education systems, the Advisory Board should consult with a formally constituted interjurisdictional group (see below) comprising representatives of State and Territory tertiary education, skills and training departments.

The University supports the Accord recommendation that the ATEC establish **standing councils** within the Commission to bring in specialist expertise from across the tertiary sector, and in particular areas including a First Nations Council and a Learning and Teaching Council.

The ATEC should also have a **Consultative Committee** made up of representatives from providers, governments, students, staff, employers, unions, alumni, and civil society. This structure will go some way to supporting the ATEC's independence and expertise while also facilitating a constructive relationship with the sector. Other government departments indirectly impacting the higher education sector, such as Home Affairs for international education policy and Industry for research policy, should also have representatives on the Consultative Committee. The roles of the Advisory Board and the Consultative Committee will need to be delineated in the establishing legislation.

The ATEC should also be supported by an **interjurisdictional working group on tertiary education reform** to ensure State and Territory Governments, with responsibility for VET and custodians of university authorising legislation are appropriately connected into and can advise the ATEC on policy development.

Recommendation 15: Legislate governance advisory and consultative structures to assist ATEC in its work including:

- **ATEC Advisory Board:** The Advisory Board should be required to include, but not to be limited to, the Regional Education Commissioner, the Australian Research Council (ARC) board chair, the Tertiary Education Quality and Standards Agency (TEQSA) Chief Commissioner, the Australian Skills Quality Authority (ASQA) CEO and the Jobs and Skills Australia (JSA) Commissioner. Other members should be invited to join including policy experts and sector leaders.
- **ATEC Consultative Committee:** The Committee should be required to have representatives drawn from providers, governments, students, staff, employers, unions, alumni, and civil society.
- **ATEC interjurisdictional working group on tertiary education reform:** State and Territory Governments should be invited to participate.

Staffing

Beyond the Commissioners, the Board and Committees, crucial to the ATEC's success will be its staffing. The ATEC will not be able to fulfil its goals, particularly in long-term policy development, without adequate funding and recruitment of sector specialists. The Accord identified a decline in capability and capacity within the Department as a key issue. Moving existing departmental staff into the ATEC will not address this.

As an expert strategic policy body, the ATEC will need to establish trusted working relationships with the sector and government. In addition to recruitment, formal arrangements such as secondments, short-term placements and policy fellowships, for example, between providers and the ATEC could help foster trust, while building the ATEC's expertise and understanding of universities' operational constraints.

Recommendation 16: Aim for a staffing profile with a weighting towards sector specialists rather than policy generalists. From the ATEC's commencement, establish formal mechanisms designed to foster trust and build expertise such as secondments, short-term placements and policy fellowships between providers and the ATEC.

Tertiary Future State

The University envisions a fundamentally redesigned higher education system with the capacity to educate the much larger number of students established by the Accord and government and to meet the requirements of the future workforce. The higher education system of the future will place student choice at the centre and be designed to meet the needs of a more heterogeneous and motivationally-diverse cohort of students with a range of preferences in learning format and location. The higher education system will recognise the centrality of research to the university mission and enable a sustainable research system that delivers future productivity, resilience and prosperity to the nation. More system diversity will result in a tertiary education ecosystem differentiating among teaching-intensive, research-intensive and vocational training institutions, with students able to move among these options. As the University outlined in its submission to the Accord Interim Report, only a redesigned tertiary education system can simultaneously expand provision and access at high quality and acceptable cost. To do so, it must:

- Expand student choice, tailoring education to student preference, need and accessibility, and creating pathways of access and continuous learning.
- Build a larger, secure and specialist academic workforce, able to deliver the highest quality of education and student support, as well as world-leading research capability, at a sustainable cost to public and student finances.
- Create more diverse entry-points, tailored transition options and re-entry points, along with support systems designed to maximise student retention and success.
- Move from a dispersed, homogeneous, competitive sector to a diverse, complementary and mutually supportive ecosystem of tertiary education providers.

The current governance, administrative and policy apparatus is not fit-for-purpose in being able to design and drive this system change. The ATEC should be established in such a way that it can assume responsibility and accountability for this important work, working collaboratively with the sector. The government of the day could be confident it has the benefit of expert advice from which to devise policy, the Department can be freed to focus on implementation and the sector could be reassured that policy work was based on a clear understanding of the practical operations of a university, that respected institutional autonomy with appropriate accountability and, through Compacts, facilitated mission-specific funding.

Summary of recommendations

A revised proposal for the ATEC should be issued following further consultation. Only after that should an exposure draft of the enabling legislation be released for consultation and well before it is introduced into the parliament.

Recommendation 1: In legislation include in the Objectives that ATEC will conduct and commission research to inform its work in developing policy advice and in stewarding the higher education sector.

Recommendation 2: The ATEC should be established as a statutory body, reporting directly to the Minister and fully independent from the Department of Education and regulatory agencies. It should actively recruit from outside the Department

Recommendation 3: In designing the ATEC the essential features of independence, transparency, and community-wide perspective, supported by sector expertise should be incorporated.

Recommendation 4a: Resource the ATEC sufficiently to enable it to build a deep well of sectoral knowledge and policy capability, to enable it to provide evidenced-based, independent, transparent advice and information to government, to inform policy making.

Recommendation 4b: ATEC to be specifically authorised to conduct and commission research to inform its work facilitating the development of higher education policy settings.

Recommendation 5: Require ATEC to engage closely and regularly with the sector and across government through the establishment of formal mechanisms for this purpose.

Recommendation 6: Task the ATEC with undertaking a regular independent pricing exercise focused on identifying the true costs of delivery.

Recommendation 7: Legislate to make the ATEC the convenor of Compact negotiations between institution and Department and require the ATEC to maintain a public register of all approved Compacts.

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Recommendation 12: Task the ATEC with monitoring the implementation of the Accord.

Recommendation 13: To maintain the ATEC's independence:

- The Minister should be able to direct the ATEC in an annual Letter of Expectations, and otherwise only in general terms.
- Legislation should require transparency with regards to all the ATEC processes, including making public all data, reports and advice to government and any government 'direction' to the ATEC.
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- **ATEC Consultative Committee:** The Committee should be required to have representatives drawn from providers, governments, students, staff, employers, unions, alumni, and civil society.
- **ATEC interjurisdictional working group on tertiary education reform:** State and Territory Governments should be invited to participate.

Recommendation 16: Aim for a staffing profile with a weighting towards sector specialists rather than policy generalists. From the ATEC's commencement, establish formal mechanisms designed to foster trust and build expertise such as secondments, short-term placements and policy fellowships between providers and the ATEC.

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