

Equity Performance and Accountability

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2017 Equity Fellowship Report

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Challenges, Strategic Priorities for Change, and Recommendations

In looking at systemic changes to the way in which equity in higher education can be advanced, the report does not focus on isolated recommendations of an incremental nature. Two core recommendations are made for progressing four strategic priorities for change that respond to six accountability challenges identified in the research.

Equity and Accountability Challenges Identified in the Research

- 1. Student equity is framed at system, group, local and individual levels but accountability for student equity is not.
- 2. There is inconsistent alignment between equity group goals, and their resourcing, measurement and evaluation.
- 3. There is consensus around legitimacy of some groups, but opinions differ as to whether other groups warrant equity group status.
- 4. Equity is shaped by many institutions and different timeframe considerations outside of higher education.
- 5. Public investment in financing student equity is not well understood.
- 6. Student equity is not a sufficiently prominent feature of the higher education regulatory environment.

Strategic Priorities for Change in Response to Equity and Accountability Challenges

- 1. Refine equity goals.
- 2. Improve information management.
- 3. Embed student equity goals across the higher education system.
- 4. Analyse, report and disseminate outcomes.

Recommendations

- 1. The Australian Government adopts an Operational Framework for Student Equity that integrates system, national, local and individual dimensions of student equity and which is embedded across the Australian higher education system.
- 2. Processes for developing pathways for each of the four strategic priorities for change be developed and implemented, with reference to each other, and in consultation with all stakeholders.

Executive Summary

Australian governments have actively enabled the transition from an elite to a high-participation higher education system that now places higher education within reach of all capable students. However, some groups are underrepresented in higher education compared to their representation in broader society. The Australian Government allocates significant public funding to redress underrepresentation and to support the participation of capable students who experience barriers to participation in higher education.

Public investment in student equity is inescapably tied to public accountability. Public funding for student equity is substantial and spans a range of equity-specific and general funding programs. Equity-specific programs such as the Higher Education Participation and Partnerships Program (HEPPP) represent around \$300 million of annual Commonwealth investment. Programs that support the participation of all students are also relevant to student equity. The Commonwealth Grants Scheme, income contingent loans and student income support represent billions of dollars in public investment that support equity goals.

The Fellowship research sought to better understand how accountability for performance against equity policy goals and funding operates across the Australian higher education system. This entailed consideration of: how equity goals are defined; who defines equity goals; how equity goals are resourced; how performance against equity goals is monitored and reviewed; and what consequences arise from a level of equity performance.

Optimising accountability for public expenditure on student equity in higher education is a major challenge. There are numerous stakeholders, equity groups, programs and institutions. Securing consensus on reform is difficult.

The best way of securing bi-partisan support in Australian government is to provide a sound strategic case for good public policy-based on the efficiency and effectiveness of public expenditure. Collaboration and consultation with all stakeholders may achieve a consensus around which reform can be achieved.

The report seeks to understand, reconcile and integrate legitimate different perspectives from a range of system stakeholders. Accountability at a system level is contentious because it throws a spotlight on the operations and performance of multiple stakeholders. However, all parts of the system can improve the role they play in student equity.

To improve accountability in student equity, there must be greater clarity around student equity objectives to provide a reference point for policy across the system. This requires high levels of transparency so that stakeholders are aware of the equity goals, how they are embedded across the system, and how elements of the system are performing.

The Australian Government needs to take the lead in bringing stakeholders with diverse interests together to develop an equity in higher education narrative that will strengthen the education system as well as contribute to a more productive and socially mobile society. The Commonwealth is best placed to facilitate strong working relationships with schools, training, innovation, industry and public sectors, and to achieve a more 'joined up' policy framework than that currently in place today.

To better understand how accountability for performance against equity policy goals and funding operates across the Australian higher education system, this research involved four strands of activity:

- 1. Theoretical perspectives on equity and accountability, through a review of the literature. This process informed research design, data collection and analysis.
- 2. Analysis of secondary data to identify how equity and accountability is embedded within relevant legislation, regulation, statistics, strategic plans and annual reports.

- 3. Interviews with leaders from across the sector, including current and former Vice-Chancellors, to understand their perspectives on student equity and accountability.
- 4. Surveys of managers from across the sector to understand the perspectives of staff within institutions on equity and accountability.

Challenges Identified in the Research

The research identified six challenges for accountability in equity in higher education:

1. Student equity is framed at system, group, local and individual levels but accountability for student equity is not

Student equity is framed as a general principle (an accessible system for all), as concern for the participation of underrepresented groups (such as regional students), at a local level (such as a university's local community), and at an individual level focused on participation of marginalised and disadvantaged people. Accountability for equity is primarily focused on designated equity groups, with limited consideration of the relevance of how equity fits to higher education accountability at a system, local and individual level. Conceptualisations of equity do not appear to have adjusted to universal rates of participation.

2. There is inconsistent alignment between equity group goals, and their resourcing, measurement and evaluation

Australian higher education equity policy is focused on designated equity groups. There is inconsistent alignment of funding, measurement and evaluation by equity group. Participation for some groups is supported through equity-specific programs. The participation of some groups is not linked to a specific program, which are instead enabled through general funding programs that are available to all students. Commonwealth and institutional performance reports are inconsistent in the equity groups included for analysis. There is no systematic approach to resourcing, measurement and evaluation of equity at a local and individual level.

3. There is consensus around legitimacy of some groups, but opinions differ as to whether other groups warrant equity group status

There is broad consensus on the legitimacy of policy attention on representation of some groups, particularly Indigenous, low socioeconomic status, regional and remote, and disability. Some sector leaders questioned the relevance of women in non-traditional areas and non-English speaking background. Some sector leaders proposed groups based on different characteristics (e.g. religion or sexual orientation).

4. Equity is shaped by many institutions and different timeframe considerations outside of higher education

Sector leaders recognised that there were many components to equity policy that spanned Commonwealth and state governments, school, early childhood and vocational education systems, and higher education institutions. This complexity of these stakeholders contributes to challenges in aligning equity policy, performance and accountability.

5. Public investment in financing student equity is not well understood

Interviews with sector leaders and surveys of institution managers highlighted uncertainty about the full extent of Commonwealth funding for student equity, or the proportion of institutional income linked to student equity. Knowledge of equity-specific program funding is far better than knowledge of other forms of public expenditure in support of equity. Accountability for equity can be consigned to lower order importance where focus is placed on equity-specific revenues, which in many cases represent a low proportion of institutional financing.

6. Student equity is not a sufficiently prominent feature of the higher education regulatory environment

Interviews with sector leaders highlighted support for the new Higher Education Standards Framework, but with reservations around the role that the Tertiary Equity Quality and Standards Agency (TEQSA) might play in accountability for student equity. There is scope for TEQSA to increase the level of attention given to student equity. Leaders highlighted limits to the regulator's influence in matters of student equity and the importance of embedding student equity in institutional governance to progress student equity goals and enhance accountability for student equity.

Strategic Priorities for Change

There is a case to strengthen accountability given public policy importance of student equity, the magnitude of public investment, and challenges identified around accountability for equity. The strengthening of accountability is best seen as a system level challenge, resolved by progressively and collaboratively embedding strategic equity goals across the system when opportune to do so.

1. Refine equity goals

The current equity groups were first identified over 30 years ago and since then both Australian society and higher education have changed significantly. The Department of Education and Training is currently reviewing equity groups and changes are likely to be made to their composition.

In addition to national equity groups recognised by the Australian Government, some institutions have developed their own equity priorities, often shaped by local circumstances and needs. Balancing national agendas and local autonomy is a challenge. We must also not lose sight of the individual and diverse support needs. A strategic priority for change is to integrate these tiers within a coherent system of equity, performance and accountability.

A multi-tiered approach could form the basis of a new way of thinking about equity. The top tier would represent the core national priorities, linked to specific funding and other policy interventions. Below may be groups and circumstances that do not fit criteria of national priorities but have relevance at a local level and warrant continued monitoring, and are supported by general programs that support the participation of all students. Below this, policies that ensure that individuals who experience educational disadvantage are well supported could be made more explicit. The cyclical review of the tiers may assist the reprioritisation of equity groups over time, creating a dynamic feedback loop rather than the intermittent inquiry-based approach to change with perceived winners and losers.

2. Improve information management

The collection of the right data is a critical enabler of transparency and accountability for equity in higher education. While there is a growing body of data on equity in higher education, there are many gaps in information, and student equity is described in diverse ways within policy and planning documents.

A fragmented approach to student equity makes it more difficult to assess system and institutional performance against student equity goals. One cannot, for example, readily identify base funding for the participation of students from equity groups. Public accountability for student equity is eroded if the full extent of public investment is opaque.

Any changes to equity goals, such as the multi-tiered approach described above, will have implications for higher education information management. There is a need to harmonise reporting, and reporting standards and definitions, to enable researchers and policymakers

to investigate student equity more effectively. This means clarifying what data is collected, improving how it is managed, and making better use of the data that is already collected.

One challenge in improving information management is the tension between balancing institutional autonomy with consistency in reporting across institutions. Claims to institutional autonomy and regulatory burden can be used to thwart attempts to strengthen and standardise data collection and such claims need to be assessed on their real merits. Similar issues and challenges arise in relation to privacy.

There is also a process issue with data collection — who is engaged in data collection policy and what is the process for discussing and debating change in data acquisition?

3. Embed student equity goals across the higher education system

Student equity is moderately embedded across the higher education system at national, local and individual levels. Challenges such as misalignment of goals, performance measurement and reporting, and transparency of full public funding suggest that more could be done to embed current equity goals across the system. Any refinement of equity goals will need to be integrated within a complex variety of policy instruments.

There is limited visibility over how institutions comply with current equity-related administrative or funding requirements. Much of this compliance is left to institutional governance processes, cyclically assessed by TEQSA. Student equity does not currently feature in TEQSA's risk framework, and institutions are unlikely to face regulatory consequences-based on their equity compliance regime, profile and performance, particularly where equity commitments are voluntary responses to local need.

More could be done to leverage the full public investment in student equity in pursuit of student equity goals. Public subsidies should flow to those institutions who can deliver accessibility and quality. However, under current funding arrangements, prestige and exclusivity confer financial rewards for which comparatively few students from equity groups benefit from.

The Australian Government is moving towards some performance funding and these reforms will provide lessons and opportunities to further embed equity as a design feature of a fair, accessible high-quality system.

4. Analyse, report and communicate outcomes

To improve equity outcomes, we need better reporting of data, better analysis of broader datasets and better communication of the outcomes of data analysis to all stakeholders. Because reporting is so fragmented, we are not sure what best practice looks like and there is a need for a conversation about what this means and how we reach it sector-wide. The Australian Government can play a key role in this area. It is already the custodian of important national datasets and how they interlink. It can set the parameters by which data is collected and reported. This can extend from articulating specific requirements for information within the Higher Education Information Management System (HEIMS) and Quality Indicators for Learning and Teaching (QILT) to more subtle expectations around what elements a strategic plan or annual report should include.

There is also some need to think more broadly about the ways in which data is comparable or can be linked across sectors. The transition from school or TAFE to university should not mean entirely new conceptualisations of equity and how it is measured and tracked.

These are some of the challenges and implications that could be addressed by an Operational Framework for Equity and Accountability, as illustrated in the report.

Recommendations

In looking at systemic changes to the way in which equity in higher education can be advanced, the report does not focus on isolated recommendations of an incremental nature — instead, it proposes a framework through which four priorities for change can unleash significant and continuous system-wide reforms.

The Australian Government is the only authority that can lead this process, one that requires cooperation and coordination in a process-based consultation and consensus building exercise with all stakeholders.

The report has just two significant recommendations consistent with this position:

- 1. The Australian Government adopts an Operational Framework for Student Equity that integrates system, national, local and individual dimensions of student equity across Australian higher education.
- 2. Processes for developing pathways for each of the four strategic priorities for change be developed and implemented, with reference to each other, and in consultation with all stakeholders.

Project Overview

The Equity Fellows Program is funded by the Australian Government Department of Education and Training as part of the Higher Education Participation and Partnerships Program (HEPPP). The Fellows program is managed by the NCSEHE at Curtin University. The aim of the Equity Fellows Program is to support Fellows to undertake strategic, high-impact, high-profile leadership projects targeted, sector-wide, at improving the access, participation and success of students from disadvantaged backgrounds (NCSEHE 2018).

The Equity Performance and Accountability Equity Fellows project emerges from longstanding interest in improving higher education access, participation and success for disadvantaged students. Twenty years of employment in higher education underpins an assertion that student equity is a widely supported aim often relegated to second order importance. Research undertaken through the 2016 NCSEHE Equity Fellows Program affirms these claims, and includes a quote from a university Director of Equity:

"I think the real question is: what happens to people who fail their target — nothing!" (Zacharias, 2017 p52)

The research undertaken in this project sought to understand how student equity goals are described, how these goals are set, how they are advanced, and who is accountable for them. The research aimed to better understand accountability for equity performance. If opportunities for strengthening accountability for equity-related goals could be identified, progress against equity goals is likely to be improved.

The terms 'equity', 'performance' and 'accountability' are not commonly linked concepts in higher education literature. The handful of internet search results for the phrase 'equity performance and accountability' refer only to this Fellowship project. There is an extensive literature on each of student equity in higher education, and performance and accountability in higher education, but very little literature that explicitly combines both.

In exploring equity and accountability in higher education, this report draws extensively on the work of Joseph Burke. His self-described 'deceptively simple but devilishly difficult' accountability questions informed the research design and structure of this report.

"Who is accountable to whom, for what purposes, for whose benefit, by which means, and with what consequences?" (Burke, 2005a p2)

These questions facilitated a mixed-methods investigation into accountability for equity in Australian higher education. While informed by a belief that accountability for equity could be stronger, the research questions were neutral in their positioning. If there are shortcomings in accountability for student equity objectives they need to be identified rather than asserted.

The research aims were pursued by across four core activities.

- 1. Theoretical perspectives on equity and accountability, through a review of the literature. This process informed research design, data collection and analysis.
- 2. Analysis of secondary data to identify how equity and accountability is embedded within relevant legislation, regulation, statistics, strategic plans and annual reports.
- 3. Interviews with leaders from across the sector, including current and former Vice-Chancellors, to understand their perspectives on student equity and accountability.
- 4. Surveys of managers from across the sector to understand the perspectives of staff within institutions on equity and accountability.

Relevant Literature

Accountability is broadly defined as processes through which individuals and organisations are held responsible for their actions (Ebrahim 2003). These processes have both external and internal dimensions. External dimensions include obligations to meet legal requirements. Internal dimensions include taking individual responsibility for acting in accordance with an organisations mission. These accountability processes can take many forms, including reporting, evaluation, participation processes, self-regulation and social auditing (Ebrahim 2003).

Accountability may be complex and context dependent, but often has a resource utilisation focal point. A principal agent dynamic can emerge where goals are set by the funder (principal), and agents are employed in service of these goals (Ebrahim 2009). Australian higher education attracts significant direct and indirect public funding, placing the Commonwealth as principal, and higher education institutions as agents under this dichotomy. Institutions are accountable to the Commonwealth for the public funds they receive in support of the Commonwealth's policy goals.

The Commonwealth's policy goals are mediated by a broad public policy process. Within a Commonwealth policy context, the design and implementation of policy operates in accordance with various guidelines (see Department of Prime Minister and Cabinet 2017, Australian National Audit Office 2014). These guidelines represent policy as a cycle, informed by work that includes Considine (2005), and Bridgman and Davis (2004). The policy cycle describes how policy is planned, resourced, coordinated and evaluated in an orderly procedural fashion, and embeds accountability as a core design feature.

The policy cycle represents an ideal type, with the reality of public policy involving countless interactions between policies, policy cycles, and policy actors (Carney 2015). Australia has mature systems in place to corral the complex interactions evident in public policy. There are many who criticise these systems, claiming that Australian democracy (and public policy) is in crisis (Milne 2015, Anderson 2015, Macintyre 2015). Australia is an advanced modern democratic society with an enviable social and economic record, where public accountability is an integral part of public policy.

Higher education is part of this ecology of public policy and public policy processes. The policy context for higher education is complicated by interactions with the policy goals of both state and Commonwealth governments. The history of the Australian higher education system sees most universities established through state legislatures, but responsibility for funding and regulation resides with the Commonwealth. The demarcation of roles and responsibilities across state and Commonwealth governments are generally well understood, but problems do arise in some aspects of university operations (Department of Prime Minister and Cabinet 2014).

Australian universities are established as body politic and corporate and operate with a high degree of autonomy (Orr 2012, Davis 2017 p41). They are self-accrediting and self-assuring institutions accountable to their internal body politic and their external principle funders. Accountability for universities interacts with the expectations of state and Commonwealth governments, and internal governance and accountability practices of universities. Tensions and challenges can arise for universities in balancing the external expectations of governments with internal motivations of academic communities (Karmel 1990).

The tensions involved in coordinating higher education policy and balancing state and institutional interests are not new, nor restricted to Australia. Burton Clark's seminal work on academic organisation includes a triangle of coordination (Clark 1983, p143). Clark's 'iron triangle' positions state authority, the academic oligarchy, and the market as three determinants of higher education systems.

The triangle was developed to understand forces driving system coordination, but can be applied to a range of higher education issues, including accountability and student equity. The state (governments) may design policy to achieve a specific objective (such as increasing the participation of low socioeconomic status students).

The state's influence over this objective will be influenced by institutional academic power structures and their willingness to prioritise state concerns over academic concerns. Investment in programs to support low socioeconomic status students, such as scholarships, are in an active trade-off against other internal priorities such as research.

The market, is partly a function of educational achievement and community demand for higher education. Demand for some groups is stronger, such as those from high socioeconomic backgrounds. For those from low socioeconomic status backgrounds, lower rates of school achievement correlates with lower demand. There is a long-term increase in labour market demand for graduates.

The triangle of coordination is useful for highlighting the dynamic interaction between internal and external, principle and agent, and leaders and stakeholders in higher education. There is no readily identifiable point at which these forces are in balance. The state does exert however, considerable influence over Australian higher education through financing and regulatory powers, and this influence includes a stronger focus on accountability across time. The expansion of Australian higher education, for example, has been supported by an increase in Commonwealth funding for higher education, and coincided stronger accountability systems (Linke 1991).

There are many insights that can be drawn from the Australian experience of accountability, but the diverse nature of the American higher education system has triggered a more extensive literature on higher education accountability. Buke and Minassians (2002) highlight that more public funding coincides with more complex forms of regulation, and need for stronger accountability. Burke and Minassians (2003) identified over 150 higher education performance indicators through The American Annual Survey of State Higher Education Finance Officers. There are risks of '360 degree harassment' of universities (Burke 2005b p323) if the complexity of accountability requirements increases in line with growth in public funding and a widening of stakeholders and their expectations. Burke recommends that government, academic and market concerns be balanced with better, not more, accountability.

The pursuit of better performance in higher education has also been examined by Bill Massy (2016). Through a systems approach, mission focus, and close attention to budgeting and resource allocation Massy suggests "universities and colleges can be a great deal better than they are" (Massy 2003, p5). Budgeting is not a prominent unit of analysis in equity literature, with few examples identified in the literature that quantify public investment in equity goals, or private investment in equity group participation. Massy's 'budget trail' is a lens utilised in the current project, and motivates attempts to quantify public investment in student equity goals.

There is evidence of challenges with the coordination of accountability for equity. James and McInnis (2005) described equity policy as an area of policy stasis, with limited government interest and activity having occurred over decades preceding the 2005 publication. The Review of Australian Higher Education (Bradley et al. 2007) led to the introduction of demand-driven funding and triggered heightened interest in student equity, but broadly within conceptual parameters set decades earlier. Since the Dawkins reforms of the late 1980s and early 90s, higher education equity policy has focused on compositional diversity, reifying a division between equity and quality (Harvey et al. 2016). Student equity is identified in one of the objects of the Higher Education Support Act (2003), but there remains limited provision in Australian higher education policy to incorporate equity as an inherent feature of quality.

There is scope for better accountability for equity. Existing equity performance reporting measures have been found to be high cost and inefficient. The highest compliance costs are linked to equity programs (Philips KPA 2012). Policy reviews relating to specific equity groups, such as Indigenous participation (see for example Behrendt et al. 2012) have recommended improvements to evaluation and accountability structures. The project of NCSEHE 2017 Equity Fellow, Professor James Smith, responds to Behrendt and other review recommendations to explore how Indigenous program evaluation can be improved.

The literature helps shape the central research questions for this project:

- What is the policy goal for student equity and how and where are the equity goals made explicit? Which policy actors and processes are involved in formalising these goals?
- What policy instruments, regulatory, financial or other, are utilised in the implementation of student equity policy goals?
- How are student equity objectives prioritised at an institutional level?
- How is institutional prioritisation of equity goals and policy reviewed and evaluated?
 Is there alignment across policy goals, policy instruments, institutional delivery and evaluation? Are there consequences that arise from a particular level of performance?

These questions are infrequently asked of student equity at a system level. The last whole of system equity focused review was over 20 years ago with *Equality, diversity and excellence:* advancing the national higher education equity framework (National Board of Employment, Education and Training. Higher Education Council 1996). This review was focused primarily on how progress against the goals set by A Fair Chance For All (Commonwealth of Australian 1990), and did not fully interrogate other aspects of student equity that lay beyond the equity groups.

Equity policy and research tends to examine equity at an equity group and Commonwealth funding program level, rather than system level. Equity programs such as the HEPPP (ACIL Allen 2017), and the Disability Support Program (KPMG 2015) have been subject to evaluation. Reviews have also been conducted into specific equity groups, including Indigenous persons (Behrendt 2012) and regional and remote students (Halsey 2017).

These review and evaluation processes highlight that there is considerable detail to contend with in examining equity and accountability from a systems perspective. It is clearly beyond the scope of this project to undertake comprehensive analysis of all facets of student equity in Australian higher education. The project does however aim to identify explicit equity references in a sample of (mainly) public documents to better understand how equity goals are expressed across policy and institutional settings.

Analysis of Government Policy and Institution Planning Data

To understand how accountability for student equity is integrated within public policy and institution governance, a number of policy and institutional reference points were considered. Equity references are dispersed across state government policy (e.g. equity aspects of university legislation), Commonwealth policy (e.g. equity aspects of policy instruments that fund Australian higher education), and institutional planning (e.g. equity aspects of institutional annual reports). Not all policy and planning reference points are public, with various reports and documents prepared for internal rather than public use. A targeted approach was adopted in analysis of equity references in policy and planning reference points. The approach provides insights into the ways in which student equity goals are expressed in policy and planning, but does not claim to be an authoritative account of the ways in which student equity policy is expressed, nor examine all documents in which equity policy references can be found.

Equity policy goals

Government programs are comprised of various program expenses (e.g. Commonwealth Grants Scheme for higher education) and linked to deliverables and key performance indicators. The government assesses policy outcomes to determine funding for programs linked to particular policies using the Outcomes and Programs Framework (Australian Government, 2014, p. 58).

The current research identified and tracked equity policy goals across the Outcomes and Programs Framework and utilised within Portfolio Budget Statements (e.g. Department of Education and Training 2017a). Where references were made within the Portfolio Budget Statement to other policy instruments (e.g. Higher Education Support Act or Quality Indicators for Learning and Teaching), these instruments were also examined to identify explicit references to student equity goals.

Policy instruments

Policy instruments relevant to student equity goals were identified through Portfolio Budget Statement analysis and the literature on higher education policy, financing and regulation including Lee Dow and Braithwaite (2013), Norton (2013) and Brett and Harvey (2017).

The conceptual approach to the current research recognised the equity dimensions of a range of policy instruments including the Higher Education Loan Program. The Higher Education Loan Program was established to ensure that disadvantaged students would not be excluded from higher education by the reintroduction of student fees. It has equity features even though it is available to all. The conceptual approach also similarly recognised the equity dimensions of student income support and the Commonwealth Grant Scheme.

Institutional equity goals

Institutional equity goals were identified by examining explicit references to student equity within university strategic plans. The strategic plans of non-university higher education institutions were not systematically examined as their plans are not widely published. The strategic plans of Australian universities available in March 2017 provided a snapshot of equity across the sector. University strategic plans from May 2012 enabled some analysis of changes to equity references across time.

A decision to focus on strategic plans rather than specialised plans (such as Teaching and Learning Plans, Reconciliation Action Plans, Social Inclusion Plans, Diversity Plans and other variants) was both expedient and purposeful. It captured information on equity references of sufficient importance to warrant inclusion in an institutions primary public statement of its priorities.

Equity goal evaluation

Equity goal evaluation was explored by analysis of university annual reports. Reports from 2015 were examined to identify explicit references to student equity goals and performance indicators. All annual reports included qualitative references to programs and initiatives (e.g. award of scholarships for an equity-related purpose), and acquittal of equity program funding (e.g. income and expenditure on the HEPPP). The primary focal point for analysis was on quantitative indicators of equity performance against specified goals. Qualitative narrative and accurate financial acquittals serve important accountability purposes but are no substitute for quantitative evidence of progress against an explicit goal.

This research provides an illustrative representation of university equity goals and evaluation in a context where university strategic plans and annual reports are published in a variety of styles and formats. Some strategic plans set an agenda for decades, others for years. Some are detailed and articulate specific performance targets against a clear baseline. Other strategic plans are more general in describing performance expectations. Annual reports

have greater consistency, but there are significant variations in the level of detail provided about institutional performance. Lower tier planning documents (such as Teaching and Learning Plans or Disability Action Plans) may provide more nuanced information about institutional student equity goals and performance, but at a system level will also present methodological challenges in controlling for style, format, timeframe and context.

Auditor general assessments of 2015 annual reports were assessed for equity-related references. Most university annual reports are scrutinised by auditor generals of their respective state and territory to assess institutional finances and sustainability. These reports serve an important public accountability function, and whilst primarily concerned with financial matters, consider a range of policy and operational matters.

Custom data was also obtained from the Department of Education and Training on equivalent full-time student load (EFTSL) by funding cluster and by equity groups in Commonwealth Supported Places. This data enabled Commonwealth investment in the participation of student equity groups to be calculated. Publicly available data on student equity group participation does not publish data by EFTSL or fee type that would allow public or private investment in equity participation to be calculated.

Custom data was also obtained from the Department of Education and Training on the representation of equity groups across universities, and broad category of non-Table A and B providers. This data was distinctive for providing an enrolment count across every permutation of currently defined equity groups (low socioeconomic status, regional and remote, disability, Indigenous, non-English speaking background and women in non-traditional areas). An aggregate picture of student equity group participation could be generated from this data that did not double count students who were members of multiple equity categories. To illustrate, a non-English speaking background, student with a disability, and a regional permanent home address could be counted once, rather than counted in each of these equity categories. The data was broken down by individual university (and non-Table A/B providers in aggregate), course level and year. This student equity participation data was linked to higher education financing information and other performance data to understand whether some institutions aggregate student equity profile correlated with equity policy goals, institutional financing and accountability practices.

Interviews with Higher Education Leaders

Executives, senior managers and public figures were interviewed to understand their perspectives on accountability for equity at a system level. These leaders were purposefully selected for their knowledge of equity and accountability at a system level. The sampling process did not intend to be representative of every state, leadership role or affiliation across the system. The variety of roles and affiliations occupied by these leaders generates diverse individual insights into equity and accountability-related matters, but key themes of consensus were also revealed. Interview participants were assured of confidentiality, and provision was made for them to influence how their comments were referenced within this study. Participant gender and geography are outlined in Table 1, followed by a list of participant affiliations and roles.

Table 1: Interview participant characteristics

Interview participant characteristics		Number
Gender	Male	12
	Female	12
State	Victoria	14
	Australian Capital Territory	4
	Western Australia	3
	Queensland	2
	New South Wales	1

Interview participant role and affiliation

- I 1 Executive Director, Higher Education Network
- 12 Higher Education Peak Body Representative
- 13 Policy Manager, Government Department
- 14 Program Director, Policy Institute
- 15 Director Equity, University
- I 6 President, Staff organisation
- 17 Vice-Chancellor, University
- 18 Director Governance, University
- 19 Partner, Consulting Firm
- I 10 Executive Director, Higher Education Network
- I 11 Deputy Vice-Chancellor, University
- I 12 Former Vice-Chancellor, University
- I 13 Director Learning and Teaching, non-Table A provider
- 1 14 Chief Executive Officer, Government Agency
- I 15 Former Vice-President, University
- I 16 Former Vice-Chancellor, University
- I 17 Deputy Vice-Chancellor, University
- I 18 Director, Consulting Firm
- I 19 Director, Policy Centre
- 120 Policy Manager, Higher Education Network
- I 21 Chief Executive Officer, Higher Education Network
- I 22 Policy analyst, Higher Education Network
- I 23 Director Planning, University
- 124 Senior Executive Higher Education Institution

The interview protocol (Appendix 1) was informed by Lacy et al. (2017). Interview participants were asked to complete a brief in-interview questionnaire and a series of semi-structured questions relating to equity and accountability. Interview recordings were transcribed and analysed thematically both inductively and deductively within NVivo.

Survey of Higher Education Managers

Higher education managers were surveyed to gather their perspectives on accountability for equity within their institutional settings. Managers across planning, private provider, quality and compliance, equity and disability roles were recruited through professional network email lists. The survey was non-identifying, but did collect information about institutional setting and professional responsibilities. Respondents were asked questions about their level of agreement with a series of thematically grouped statements, using a five-point Likert scale.

Themes included:

- The setting of equity goals within their institution and the transparency of these goals.
- The orientation of their institutions equity goals towards internal or external drivers.
- The resourcing of student equity goals.
- · Performance against student equity goals.

There were 61 valid survey responses. Respondent characteristics are outlined in Table 2. The survey instrument is included in Appendix 1.

Table 2: Survey respondent characteristics

Respondent characteristics		Breakdown
Institutional affiliation	Australian university	82%
	Higher education provider/other	18%
Institutional headquarters	State capital city	79%
	Other	21%
Institutional scale	Less than 20,000 students/other	21%
	Between 20,00 and 40,000 students	41%
	More than 40,000 students	38%
Professional responsibilities	Higher education senior manager	44%
	Higher education manager	20%
	Higher education professional/other	37%
Equity responsibilities	Equity a component of responsibilities	80%
	Equity is the primary focus of responsibilities	20%

Policy and Planning Data Analysis

Equity Goals in a Universal Participation Context

Equity-related goals are evident across the history of Australian higher education. The University of Sydney was established to be open to all classes and denominations (University of Sydney Act 1850). The University of Western Australia's was established with recognition that "special encouragement and assistance should be afforded those who may be hindered ... by lack of opportunity or means" (University of Western Australia Act 1911). Historic references to notions such as 'open to all', 'opportunity' and 'special encouragement' are linked to student equity, and highlight that student equity discourse can utilise terms and concepts that are open to subjective interpretation.

The variety of student equity-related terminology is evident in the Commonwealth's webpage on Access and Participation (Department of Education and Training 2017b). This page utilises a variety of terms (access, participation, marginalised, disadvantaged), applied to various groups (low socioeconomic status, students with disability, regional, rural), and in the context of a universally applicable principle (all people with a desire and capability to attend university have an opportunity to do so).

University references to student equity within strategic plans also demonstrates variety in terminology and conceptualisation. Universities are committed to principles (including equity, equal opportunity and social inclusion), applied to various groups and attributes (refugees, LGBTI+, first-in-family and mental illness are referenced in addition to longstanding Commonwealth defined equity groups), and involving various operational commitments (universal design, contextual admissions and pathways).

The breadth of terms and concepts linked to student equity in higher education erodes the clarity of student equity policy goals. A review of student equity groups in Australian higher education has found for example, "a dearth of formal explicit theoretical definitions of disadvantage in [higher education]." (Institute for Social Science Research 2017 p 5). This current research takes the position that accountability for student equity goals will be enhanced if these goals are expressed clearly, are backed by strong theoretical underpinnings, and in ways that have relevance for the operations of the system.

The diversity in student equity terminology now evident in policy and planning documents is potentially explained by an inability to address challenges arising from a transition to universal participation. Martin Trow's (1973) defined universal participation as occurring when around half or more of the age grade participates in that level of education. When the majority of an age cohort is engaged, participation is normalised as a social expectation, and becomes in Trow's framing, 'universal'. Trow described challenges in the transition across "Max Weber's ideal types" (Trow 1973 p18), illustrative rather than rigid definitions:

- Elite (less than 15 per cent of the age cohort participating)
- Mass (between 15 per cent and 50 per cent of the age cohort)
- Universal (greater than 50 per cent of the age cohort).

The challenges in transition across these types include adapting systems, administration, financing and operations to cater for a more diverse group of students. The application of Trow's universal participation typology to the Australian context is not straight forward. Originating from an American context and tradition of two-year programs and community colleges, Trow's 50 per cent threshold includes some programs that are situated in the Australian vocational education and training sector. Australia has clearly moved beyond the elite typology, and is progressing rapidly towards universal participation, if not there already.

Recent census data highlights that Australia has now reached what might be understood as universal participation in tertiary education (Table 3). More than half of all recent school

leavers now enter tertiary education. Over 40 per cent of recent school leavers are enrolled in universities and other tertiary institutions. There is a decline in the share of recent school leaver tertiary students enrolled in TAFE.

Table 3: Recent school leaver participation in tertiary education 2006-16Source: Australian Bureau of Statistics, Census of Population and Housing Table Builder

	Australian o	Australian citizens 19 and 20 years of age		
	2006	2011	2016	
Technical or further educational institution (including TAFE colleges)	14.0%	12.7%	10.1%	
University or other tertiary institution	29.7%	34.9%	41.2%	
Total tertiary education	43.7%	47 7%	51 4%	

Student equity policy frameworks have not been adequately adjusted to reflect the transition to universal participation. Equity groups first identified in 1984 remain the primary lens through which higher education equity policy is considered. Trial indicators, such as those used for disability, have been retained without change (Brett 2016, Martin 2016), despite considerable theoretical and applied advances in our understanding of disability. It is not evident from the analysis of policy and planning documents that the implications of universal participation for student equity policy have been systematically considered.

This research did not intend to review and update the Commonwealth's equity policy goals. The Department of Education and Training has commissioned other researchers to review equity groups and their measurement. If student equity policy goals are to be updated, the success of any change will be dependent on how updated goals are embedded across relevant components of the higher education system

ACCOUNTABILITY CHALLENGE 1

Student equity is framed at system, group, local and individual levels but accountability for student equity is not

Student equity is framed as a general principle (an accessible system for all), as concern for the participation of underrepresented groups (such as regional students), at a local level (such as a university's local community), and at an individual level focused on participation of marginalised and disadvantaged people. Accountability for equity is primarily focused on designated equity groups, with limited consideration of the relevance of equity fits to higher education accountability at a system, local and individual level. Conceptualisations of equity do not appear to have adjusted to universal rates of participation.

Student Equity across the Higher Education System

Student equity goals are already embedded in higher education policy and planning. Student equity references, encompassing the principle, group and individual perspective, are now described, structured by the following tiers of the higher education system:

- 1. Drivers of higher education system expansion.
- 2. Market expectations.
- 3. Electorate values.
- 4. Financing of student equity.
- 5. Institutional mission.
- 6. Evaluation.

1. Drivers of higher education system expansion

System expansion has proven to be an important mechanism through which opportunities for disadvantaged and marginalised groups to participate in higher education can be realised (Marginson 2016). The underlying drivers of system expansion are therefore an important consideration in understanding equity in Australian higher education. Without demand for higher education there can be no equity or inequity in higher education. Marginson identifies social, economic and political factors as drivers of higher education system expansion.

Social expectations of access to higher education are core to Trow's (1973) typology of elite, mass and universal participation. However, underrepresented groups, by virtue of their underrepresentation, have lower expectations of access to higher education. This suggests that system expansion, and the positive effects of expansion on student equity, are stimulated by those outside rather than part of underrepresented groups.

Economic demand for skilled labour has propelled expansion of higher education since World War II (Forsythe 2014). Economic demand for a skilled workforce has been a core consideration of higher education policy design across many decades. Dawkins, Bradley and Birmingham reforms of higher education policy have placed economic demand for skilled labour as central to policy choices. Each step change increase in labour market demand for graduates necessitates greater participation from historically underrepresented groups.

Where social and economic demand for higher education is weak, political drivers play an important role in catalysing demand in low participation regions. Recent work by the University of Tasmania (2017) for example, represents collaborative efforts across local, state and Commonwealth governments, and the University of Tasmania. To catalyse an expansion of demand for higher education in the Tasmanian population.

2. Market expectations

The Australian higher education system has grown in the post-war era, transitioning from elite to a mass (and now arguably a universal system). Market mechanisms have been favoured by recent governments for allocation public tertiary education subsidies, such as demand-driven funding for Commonwealth Supported Places. Market mechanisms replaced centralised place allocation mechanisms, consistent with what Corden (2005) described as "Moscow on the Molonglo".

Policymakers are placing more attention on providing the higher education market with information to make informed decisions. This includes steps to improve the transparency in tertiary admissions (Australian Government 2017a) and Quality Indicators of Learning and Teaching (QILT). Implicit in admissions transparency and QILT are assumptions that the market is concerned with equity of access, teaching quality and graduate outcomes. Equity groups and equity considerations are evident within admissions transparency templates and QILT survey reports.

Expectations of access, quality and outcomes can be augmented with market expectations around cost and affordability. Six per cent of domestic undergraduate students are enrolled in full fee paying programs (Department of Education and Training 2018). Students overwhelmingly choose publicly subsidised offerings at public universities over full fee alternatives. A decreasing proportion of total student Higher Education Contribution Scheme (HECS) contributions are being paid up-front. Payments decreased form 17.5 per cent to 14 per cent from 2003 to 2013 (Department of Education and Training 2014). The preference for public subsidy not only shapes the market, but influences electoral values on matters of higher education.

3. Electorate values

Student equity is an important policy value that informs higher education policy. The higher education options paper Driving Innovation, Fairness and Excellence in Australian Higher Education (Australian Government 2016) positioned 'Fairness' as an equity-related policy goal linked to both 'Excellence' and 'Innovation'. More than 1,200 submissions were made in response to this consultation process (Department of Education and Training 2017c). Given the prominence given to student equity within the options paper, many submissions affirmed the importance of access and equity to the Australian higher education system (e.g. Group of Eight Submission). Student equity is embedded as a consideration within higher education policy consultation. As the Innovative Research Universities submission identified "ultimately it is the government's decision how it wishes to invest in a country's higher education", and the government translates electorate values and feedback into policy-specific policies and policy instruments.

4. Financing of student equity

The Department of Education and Training 2017-18 Portfolio Budget Statement (Department of Education and Training 2017a) describes why the Government invests in student equity in higher education, how much is appropriated, and the programs on which money is spent. Outcome 2 articulates the high-level goal for Australian higher education, which includes 'access' as a student equity relevant term. Equity references are dispersed throughout the Portfolio Budget Statement to support this outcome.

Promote growth in economic productivity and social wellbeing through access to quality higher education, international education, and international quality research, skills and training. (Department of Education and Training 2017a, p4)

Program 2.1: Commonwealth Grant Scheme

This program distributes just under \$7 billion of funding to the higher education system and includes support of 'educationally disadvantaged' (p 47) through enabling course loadings and \$71 million of Regional Loading. The proportion of Commonwealth Grant Scheme funding that supports equity group participation is not routinely reported in the Portfolio Budget Statement or other Government reports.

Program 2.3: Higher Education Support

Over \$420 million is distributed for higher education support (p 50) that includes the aim of improving access to, and outcomes for, disadvantaged students. Student equity-related expenses through this program include:

- Higher Education Participation and Partnership Program which targets access and participation for students from low socioeconomic status backgrounds (\$140 million),
- Rural and Regional Enterprise Scholarships Students (\$4 million)
- Disability Support Program (\$7 million)

Program 2.4: Higher Education Loan Program

Program expenses of \$1.5 billion are related to higher education, with additional expense incurred relating to VET student loans (p55). Loan program expenses relate to actuarial estimates of costs of administering student loans (including making provision for loans that are not expected to be repaid). The Portfolio Budget Statement does not describe the amounts that are loaned to higher education equity group students. The Portfolio Budget Statement does not include information on the likelihood that equity group students are more or less likely to make loan repayments.

Program 2.5: Investment in higher education research

Program expenses include over \$1 billion for the research training program. The allocation formula for the research training program includes institutional performance on research higher degree completions, with weightings applied for Indigenous and non-Indigenous completions by discipline. The inclusion of Indigenous performance within the research training program implies that an unspecified proportion of investment in higher education research is aligned with student equity goals.

Public investment in equity-specific programs and general support for equity students

The current research sought to estimate the total public and private investment in the participation of student equity groups. Public investment influences the evolution of higher education accountability systems (see Linke (1991) and Burke and Minassians (2002)), making an understanding of public and private resourcing an important factor in accountability for student equity goals.

To estimate public expenditure on the participation of students from equity groups, data on EFTSL by funding cluster by equity group in Commonwealth Supported Places was obtained from the Department of Education and Training. The most recent available data at the time of request was from 2015, and whilst lagged, can be used to estimate public direct and indirect investment in student equity. The data is juxtaposed for illustrative purposes with student equity program expenses described in the 2015-16 Portfolio Budget Statement (Table 4).

Table 4: Select Commonwealth expenditure on student equity 2015

Group (and equity program)	Commonwealth Grant Scheme 2015 ^a	Equity-specific program expenses PBS 2014-15
Regional Loading b)	\$1,367 million	\$70 million
Low socioeconomic status (Higher Education Participation and Partnership Program ^b)	\$1,015 million	\$176 million
Disability (Disability Support Program ^b)	\$367 million	\$7 million
Non-English speaking background	\$281 million	-
Indigenous (Commonwealth Scholarship Program, Indigenous Support Program °)	\$101 million	\$55 million
Remote	\$52 million	(included in regional)
Women in non-traditional areas	Data not provided by Department	-

- a) Department of Education and Training, Custom Data.
- b) Portfolio Budget Statement 2015-16, Department of Education.
- c) Portfolio Budget Statement 2015-16, Department of Prime Minister and Cabinet.

This juxtaposition highlights relative investment between Commonwealth contributions through the Commonwealth Grant Scheme, and other equity-specific program expenses. Some equity groups are linked a higher equity program expenses as a proportion of Grant Scheme investment than others. The data included in Table 4 cannot be simply added to generate an estimate total investment. Students belong to multiple equity categories (Table 5). One could apply the proportion of equity group enrolments to relevant higher education funding streams to generate an estimate to total public investment in student — but this pre-

supposes that designated equity groups are all that matters, and localised and individual aspects of student equity do not warrant consideration.

Table 5: Equity profile of total domestic student enrolments in Australian universities

Equity groups	Equity groups	Enrolments	Enrolments	
Any	Any	448,918		47.3%
One	Regional/remote	105,993	324,094	34.1%
	WINTA	101,221		
	Low SES	61,064		
	Disability	30,249		
	NESB	20,685		
	Indigenous	48,82		
Two	Low SES/regional remote	38,949	106,082	11.2%
	Regional remote/WINTA	18,580		
	Low SES / WINTA	12,421		
	Other combinations	36,132		
Three	Any three groups	17,471		1.8%
Four	Any four groups	1,243		0.1%
Five	Any five groups	28		0.0%
Six	All six equity groups	0		0.0%

Student equity across group, local and individual levels is supported through direct Commonwealth investment, student contributions, student income support and scholarships. These aspects of equity financing span Commonwealth portfolios and public/private perspectives. A combined multi-portfolio and public/private estimate of investment in student equity is not possible to generate. The data relevant to each element of student equity financing is not readily accessible, nor easily disaggregated by higher education and non-higher education, not equity and non-equity categories (Table 6). For example, the proportion of Youth Allowance recipients who are undertaking higher education studies, and who are also from low socioeconomic (or other equity) backgrounds is not routinely reported. Annual investment in student equity in higher education is a multi-billion rather than multi-million concern, but more precise estimates are difficult to generate given the limitations of data that is reported.

Table 6: Student equity funding streams 2015-16

Funding stream and source	Amount	Equity relevance	Equity challenges		
Commonwealth Grant Scheme & other grants (University Finance Report 2015)	\$7 b	A proportion funds participation of equity students in higher education	participation of linked to equi	participation of linked to e	The proportion linked to equity and/or higher
HECS-HELP, FEE-HELP, SA-HELP (University Finance Report 2015)	\$5 b		education not reported		
Higher Education Loan Program (Department of Education and Training Portfolio Additional Estimates Statement 2015-16)	\$2.6 b				
Youth Allowance (Department of Social Services Annual Report 2015-16)	\$2.4 b				
Research Training Scheme (HEIMS Determinations 2015)	\$678 m				
Austudy (Department of Social Services Annual Report 2015-16)	\$645 m				
Abstudy Tertiary (Department of Social Services Annual Report 2015-16)	\$114 m				

5. Regulatory environment

Public and private investment in student equity and higher education is mediated by a complex regulatory environment. Access to Commonwealth funding necessitates higher education institution compliance with an array of regulations, governance requirements and systems (Lee Dow and Braithwaite 2013) (Philips KPA 2012). Student equity requirements are integrated across this regulatory environment and include:

- Equity goals are included in the legislation of most universities.
- Equity provisions in embedded the higher education standards framework.
- Equity forms one of the objects of the Higher Education Support Act (2003).
- Equity provisions are embedded in quality and accountability sections of the Higher Education Support Act (2003); and related administrative guidelines.
- There are requirements to provide equity performance indicator data through the higher education management information system under the Higher Education Support Act (2003).
- Compliance with conditions of grants to promote equality of opportunity made through the Higher Education Support Act (2003). The Indigenous Student Assistance Guidelines, for example, require that institutions have, or have in development, an Indigenous Governance Mechanism, an Indigenous Workforce Strategy, and Indigenous Education Strategy as a condition of eligibility for funding.
- Compliance with requirements under anti-discrimination legislation.

6. Institution mission

The regulatory environment makes equity-related considerations unavoidable for higher education institutions of all types and orientations. Institutions can however, make legitimate choices about what to prioritise, and how they assess and manage their performance.

Student equity-related goals are included in the strategic plan of every Australian university. All higher education providers are required to have student equity-related policies in place to comply with the Higher Education Standards, but there is no requirement that this be articulated within strategic plans. The presence of student equity within strategic plans

represents a choice by institutions to describe student equity goals within their strategies rather than a compliance response to higher education legislation or financing policy.

To understand what universities were prioritising as equity goals, strategic plans from 2012 and 2017 were examined. References to student equity terms, groups and analogous variants were identified (Table 7). The analysis highlights there is now universal prioritisation of student equity, and near universal prioritisation of Indigenous participation within university strategic plans. Regional and/or low socioeconomic status participation is referenced by 32 out of 40 university strategic plans.

Strategic plan references highlight the challenges of coordination and accountability for student equity in higher education. Some designated groups (non-English speaking background and women in non-traditional areas) attract few references. The group targeted by the largest quantum of Commonwealth equity-specific funding, low socioeconomic status, is explicitly prioritised by only half of the sector. References are emerging for other groups and attributes for which there is no specific equity appropriation (first-in-family and LGBTI+).

Table 7: University strategic plan equity terminology references 2012 and 2017

Equity References		2012	2017
Student equity-relat	ed terminology	34/39	40/40
Equity Groups	Indigenous	27	37
	Regional	18	22
	Low socioeconomic status	21	21
	Disability	5	10
	Remote	9	8
Non-English-speaking Background		3	2
	Women in non-traditional areas	1	1
Other select	Disadvantage	14	17
equity-related references	First-in-family	2	6
16161611065	Equality	4	5
	LGBTI+	0	2

Equity strategic prioritisation is distinct from equity participation and representation. Whilst nearly half of all domestic students are members of designated equity groups, there is significant variation in equity representation across institutions. Summary data for minimum, median and maximum of any equity group participation for Table A universities, and non-university higher education institutions is outlined in Table 8. A more comprehensive description of the sector is described in Appendix 2.

Table 8: Higher education institution any equity group representation 2015Source: Department of Education and Training, Custom Data

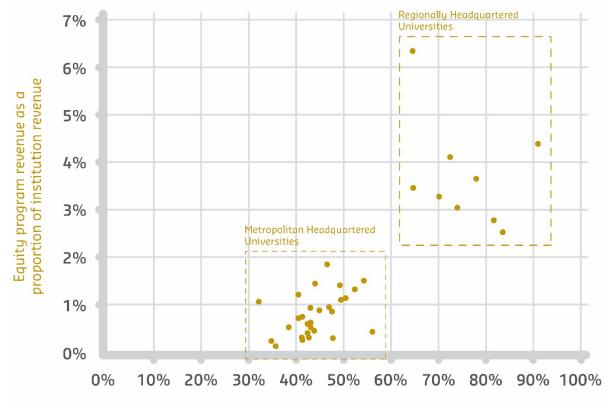
	Table A universities			Non-university	
	Minimum	Median	Maximum	higher education institutions	
Bachelor	31.9% (Australian Catholic University)	47.7%	94.2% (James Cook University)	38.8%	
Postgraduate coursework	25.7% (Australian National University)	42.0%	75.3% (University of Tasmania)	37.5%	
All students	31.6% (Australian Catholic University)	45.9%	90.3% (James Cook University)	39.6%	

Universities that service communities with strong equity characteristics have higher levels of equity group participation. Regionally headquartered universities had an any equity group representation at a bachelors level of at least 69 per cent. Postgraduate coursework students have a lower level of any equity group participation. Universities that have a higher proportion of postgraduate enrolments have lower levels of equity group representation.

Non-university higher education institutions have a lower level of equity participation than public universities. This result is not surprising given that they have limited access to Commonwealth Supported Places and other equity funding. However, equity group representation in non-university higher education institutions, is higher than the level of equity representation at many public universities.

Non-university higher education institutions play a role in the participation of students from equity groups that may warrant additional policy attention. Some non-university higher education institutions have access to Commonwealth Supported Places in designated priority areas (Department of Education and Training 2017d, Higher Education Support Act 30-10 (4)). The basis on which these places are allocated and relevance to equity policy goals is not clear. There is scope for greater transparency on the underlying principle and how it might be applied across providers.

There is a relationship between equity group participation and access to equity-specific program funding (Figure 1). This can be interpreted as the system working as designed. Additional equity subsidies are flowing to institutions who have the most equity students. Figure 1 charts public university equity group representation (any equity group) by the proportion of total institutional revenue derived from equity programs (HEPPP, Regional Loading, Indigenous Support Program and Disability Support Program).



Proportion of domestic enrolments that belong to any equity group

Figure 1: University equity group participation and equity revenue 2015

Any equity group representation V proportion institutional revenue derived from equity programs. Source: Department of Education and Training: finance reports, custom data, determinations, annual reports.

The data highlights that regionally headquartered and focused institutions attract a higher proportion of their income from equity-specific programs. The university that derives the highest proportion of its revenue from equity programs (Charles Darwin University) is one where there is strong equity representation and overlap across regional, low socioeconomic and Indigenous cohorts. Metropolitan headquartered institutions attract a smaller share of their revenue from equity programs. The relationship between equity representation and income presented has a correlation coefficient of 0.8.

Equity-specific program funding may flow to institutions who have the most equity students, but there remains a need to account for the role of base funding in supporting student equity across all parts of the system. Public universities who receive little in targeted equity funding still enrol significant proportions of students from equity groups. In these institutions, the cost of educating equity group students, including any additional support they require, is financed from an institutions base funding. In 2015 for example, the Australian National University received 0.1 per cent of its revenue through equity-specific program funding. Over a third of the Australian National University's students belonged to an equity group, with the base funding derived from these students representing a much higher proportion of revenue.

7. Evaluation

There is extensive literature around equity and evaluation, and evidence of regular review of equity programs. Recent policy reviews and evaluations include the HEPPP (ACIL Allen 2017), Disability Support (KPMG 2015) and regional and remote students (Halsey 2017). This research report considers evaluation from the perspective of alignment across policy goals, program delivery, and review. Alignment across these dimensions would be broadly

consistent with policy implementation guidelines of the Department of Prime Minister and Cabinet (2017) and Australian National Audit Office (2014).

References to equity groups in policy documents, university strategic plans, university annual reports, and review reports of university financial and management performance by state and territory Auditor Generals are described in Table 9. A pattern of misalignment is evident with inconsistent references to student equity groups within policy documents, and a reduction of references to equity groups in university planning and review documents.

Table 9: Equity group references policy and planning documents

	Policy → Delivery → Review					
Group	Equity indicator	Equity program	QILT	University strategic plans	University annual reports	Auditor General reports
Indigenous	X	X	X	37	21	-
Regional	Χ	X	-	22	8	-
Low socioeconomic status	X	X	-	21	14	-
Disability	Χ	X	X	10	13	-
Remote	X	X	-	8	8	-
Non-English speaking background	X	-	X	2	7	-
Women in non-traditional areas	X	-	-	1	2	-
First-in-family	-	-	X	6	2	-
LGBTI+	-	-	-	2	14*	-

Explanatory Notes:

- Equity indicators refer to Appendix 2 and 5 of the higher education data collection.
- Equity programs refers to higher education programs relevant to student equity described in 2017-18
 Portfolio Budget Statements (PBS). These include:
 - Higher Education Support Act Appropriations for Indigenous programs in Outcome 2.2 of Department of Prime Minister and Cabinet PBS.
 - o Regional Loading in Program 2.1 of Department of Education and Training PBS.
 - Higher Education Participation and Partnerships Program in Program 2.4 of Department of Education and Training PBS.
 - o Disability Support Program in Program 2.4 of Department of Education and Training PBS.
 - Rural and regional enterprise scholarships in Program 2.4 of Department of Education and Training PBS.
- QILT refers to equity group references in the 2016 Student Experience and Employer Satisfaction Survey Reports.
- University strategic plans refers to the number of university strategic plans accessed in March 2017 where the equity group is referenced.
- Annual reports refers to the number of 2015 university annual reports where quantitative performance
 data relating to the equity group is published, with the exception of LBGTI+ where substantive qualitative
 references to student LGBTI+ inclusion were counted. This provides a different standard by which
 LGBTI+ issues were captured, but the observed sophistication of annual report references to LGBTI+
 issues warranted this approach.
- Annual report equity performance references would be reduced considerably if counted only where data
 is published in the context of clearly specified strategic objectives and performance targets. Attention is
 drawn to the 2015 Griffith University annual report. Griffith is one of the few universities who publish
 clear quantitative equity-related strategic targets and indicators within its annual report.
- Auditor General reports refers to the number of equity group references made by each state and territory's analysis of university annual reports between 2013 and 2016. The absence of references in 2016 led to an examination of earlier reports to assess whether 2016 represented an anomaly.

No references to student equity groups, performance, revenue or expenditure were identified by the current research in Auditor General publications from 2013 to 2016. Institutional revenue is significantly influenced by student equity group participation (see Tables 4, 5, 6 and 8 and Figure 1). Policies that affect student equity group participation and revenue could be expected to feature as considerations in Auditor General assessments of institutional financial standing and stability, but do not.

Table 9 highlights accountability weaknesses that can be summarised by the following propositions: some student equity goals are not funded; some student equity goals are funded, but are not adequately evaluated; and some evaluations of performance do not relate to an explicit student equity policy or university student equity strategic planning goal. These propositions relate to equity references across policy, delivery and review documents. There are other aspects to accountability that are not surfaced by this approach in which weaknesses of accountability for equity are also evident:

Regulation:

TEQSA is responsible for accrediting higher education providers against the Higher Education Standards Framework, which include Diversity and Equity standards. Accountability for equity would be improved by incorporating equity indicators within the TEQSA Risk Assessment Framework.

- Financial probity and public sector accountability:

 Audits of institutional accounts assess whether funding has been spent in accordance with conditions of grant. All universities publish data on equity program funding and expenditure. Accountability for equity would be improved by publication of data on equity components of base funding and expenditure.
- Electorate, communities and clients:
 Institutions have obligations to the electorate, their communities and clients. A failure to meet equity-related expectations can trigger an accountability response. Campus closure proposals have met community and political resistance. A failure to provide an environment that meets anti-discrimination requirements may trigger complaints. Accountability for equity would be improved by making explicit the obligations institutions have to their communities and clients within policy and institution planning documents, and the use of a common framework for reporting on compliance.

ACCOUNTABILITY CHALLENGE 2

There is inconsistent alignment between equity group goals, and their resourcing, measurement and evaluation

Australian higher education equity policy is focused on designated equity groups. There is inconsistent alignment of funding, measurement and evaluation by equity group. Participation for some groups is supported through equity-specific programs. The participation of some groups is not linked to a specific program, instead enabled through general funding programs that are available to all students. Commonwealth and institutional performance reports are inconsistent in the equity groups included for analysis. There is no systematic approach to resourcing, measurement and evaluation of equity at a local and individual level.

Interview Findings

The policy and planning analysis sections of this report generates insights into how student equity-related concepts are integrated into system design, financing, goals, and evaluation reports. Student equity-related policy and plans are mediated by policymakers, decision makers and leaders. Policy rules that guide funding and regulation do not sit in isolation from those who make these rules, or apply these rules.

Higher education leaders were interviewed to understand their perspectives on student equity and accountability. The interviews included an in-interview questionnaire and semi-structured questions that were loosely informed by Burke's accountability questions. Questions were asked around: the nature of student equity objectives; how these objectives are set; how objectives are resourced; how performance is assessed; and broad efficacy of the system. The underlying logic of the approach was motivated by policy and quality cycle literature, and higher education coordination literature. Accountability is enhanced if objectives are explicit, understood, and performance assessed against valid criteria. Coordination is more effective if the relative significance of Commonwealth governments, state governments, institutional mission and the market in setting and implementation of objectives is understood.

The Purposes of Equity Policy

The accountability question, who is accountable for what purpose, is relevant for understanding stakeholders perspectives on what student equity objectives are, and, whether these objectives are important.

Student equity objectives were important to all leaders interviewed. Only one of 24 leaders interviewed agreed with a proposition 'there is no reason to set student equity objectives', but indicated that if the system was working as it should, there would be no underrepresentation and no need to set equity objectives. The research did not take a normative position on 'equity objectives'. Many leaders sought clarification as to what definition of 'equity objectives' was being using in the questions, but were encouraged to describe what they understood 'student equity objectives' to be. This encouraged open discussion around the meaning of student equity.

In terms of reflecting back on the conversation, I think that the interesting question around what equity is, is where does it sit in the value spectrum? Because it's a very loaded term. It assumes a moral framework, but it articulates none. I guess that's why I ask the question, "What do you mean by it?" (I-13)

The majority of leaders articulated a general principle relating to opportunities for access to higher education, augmented in some cases with a caveat that this be provided to those who are able to benefit from this opportunity. These statements implicitly assume continuation of demand-based funding for higher education.

Open to all, accessible to all, and fair to everybody who's in the process. (I-13)

At its simplest is that a person of any background is as likely to go to university as a person of any other background. (I-10)

Student equity objectives are ensuring that everyone who has the desire and the ability to successfully complete a university education has the opportunity to go to university, or flipping it around, that there is no impediment to anyone with the ability who wants to go to university to be able to go to university. (I-21)

Some leaders supplemented a statement of a general principle with comments around why the general principle matters.

Equity in education is an essential component of a civilised society, a cohesive society. So if you haven't got equality of opportunity in education, you're actually perpetuating inequity in society, and you're not allowing for any social mobility and you're not allowing for hope. (I-12)

If we start at a national level, I think that it has to be a national objective that some major parts of Australia aren't left out, to ensure national cohesion. So it's important that regions aren't left out, and it comes down to social and political cohesion at that level. I think you can see the manifestation of people being left out and left behind in things like Brexit and Trump. (I-1)

Most leaders illustrated an equal opportunity principle with reference to specific social groups. The groups most frequently referenced were those with a corresponding equity program: low socioeconomic status (21), regional (18), Indigenous (17) and disability (14). Low socioeconomic status was referred to by several as the best measure of disadvantage.

I guess I tend to focus on it [low SES] partly because I think it is the biggest genuine equity group, partly because it overlaps with the others. (I-4)

There was reduced emphasis on remote students (9) consistent with its conflation with regional issues (Pollard 2017). References to women in non-traditional areas (7) and non-English speaking background (4) were linked to doubt over their policy status and legitimacy.

I've seen evidence over many years about the success of non-English speaking background students, actually children of migrants, which I am, so I kind of watch that a bit more closely. And how well they do. And they actually do better than English-speaking background students in many cases. (I-6)

Non-English speaking background shouldn't be an equity group at all, so I wouldn't be concerned about them, they're doing fine on their own. (I-4)

Women in non-traditional has been dropped, as I understand it. (I-12)

Some leaders also discussed cohorts beyond the formal equity groups, including first-infamily (4), refugee (4), religion (4) and LGBTI+ (3).

I think it should be broadened out to catch a range of equity groups beyond that, and particularly a group that we know that don't do as well in school is the community of the LGBTI+ community that we know that they drop out more readily and more often and that they're more vulnerable to even complete secondary school. (I-5)

I'm going this afternoon to meet the asylum seeker students again because it's really good for me to hear how they're living, how exhausted they are, the fact that they can't get access to Centrelink once they get refugee status. Goodness, what are we doing to these people? (I-7)

There was general alignment between the groups referenced in equity policy goals, university goal setting and the comments of the higher education leaders interviewed. This represents the status quo of equity in Australian higher education, where some attributes and characteristics attract more policy and institutional attention than others. Government policy and institutional strategy cannot prioritise every issue in equal measure, and there will always be trades offs to be made in the pursuit of multiple priorities. Whilst attention placed on some groups is rising and falling for others, the aggregate pattern is that interest in student equity is increasing across time.

I think is there's certainly more rhetoric and more discussion of the equity issues, and it's more explicitly acknowledged in strategies, the university strategies, than it was certainly 10 or 11 years ago. I first read them all 10 or 11 years ago, and

I've since re-read every single strategy of every university around the country every year. There's more explicitly recognition and rhetoric around it. (I-9)

The process by which policy and planning focus on different groups is dynamic. The equity priorities outlined in A Fair Chance For All are framed differently to those in Driving Innovation Fairness and Excellence in Australian Higher Education, and will be framed differently in future. One Vice-Chancellor described what future priorities might involve.

Except quality should not be negotiable... At the moment, the State has put an emphasis on gender representation, but not on diversity. And it should be on diversity. Gender is the major part of that, it's the most significant diversity between the species. So now in the 21st C I think our focus for participation should be on diversity, which includes colour, ethnicity, religion, disability as well as gender. We're focusing too much on getting women onto boards and not enough on broader diversity, and always, we must focus on getting women enabled to be educated. (I-7)

ACCOUNTABILITY CHALLENGE 3

There is consensus around legitimacy of some groups, but opinions differ as to whether other groups warrant equity group status

There is broad consensus on the legitimacy of policy attention on representation of some groups, particularly Indigenous, low socioeconomic status, regional, remote and disability. Some sector leaders questioned the relevance of women in non-traditional areas and non-English speaking background. Some sector leaders proposed groups based on different characteristics (e.g. religion or sexual orientation).

Who Sets Equity Policy

The accountability question, who is accountable to whom, is relevant for understanding stakeholder perspectives on who sets student equity objectives. Leader interviews sought to clarify the relevance of government, institutions and market forces in the setting of equity objectives.

The Commonwealth, institutions, and the states were all perceived to play important roles, but there are tensions evident in how these elements of the system work together. The 'market' dimensions of Burke and Clark's triangles of coordination and accountability were not recognised as a prominent influence by sector leaders, although demand-driven funding was recognised as an important driver of equity.

The primary influences on equity policy were the Commonwealth Government and institutions. Over 90 per cent of leaders interviewed agreed with propositions that student equity objectives be set to align with institutional mission and be set by the Commonwealth Government to address issues of national significance. By comparison, 65 per cent of those interviewed agreed with a proposition that equity objectives be set by state governments to address issues of state significance.

One leader indicated there were unacceptable risks to institutions abandoning commitments to equity if given the choice to do so. This view was not shared by other leaders, and indeed some felt that equity was so integrated into institutional missions that equity would continue to be prioritised even if the Commonwealth were to withdraw its involvement.

I think if the Commonwealth totally withdrew from this tomorrow, not likely, but if they did, I'd still think there would be substantial equity programs running around the country, because most universities, probably all of them, see it as part of their mission to do this. (I-4)

Strong opinions were articulated about the relative influence of state and Commonwealth governments on equity policy. Some leaders were critical of the role states played, consigning their role to that of a distracting anachronism.

I think in higher education, it's the Commonwealth and the institution who have the greatest power because the state really doesn't have a role, other than in governance and reporting through annual reports and the like. While [State governments] can have a policy position around equity and participation, it's very hard ... We don't have very many levers to use. I think the Commonwealth does have levers and it's mostly a funding lever. (I-3)

I think there's a role for states. I think they've probably abrogated their responsibilities in many ways. I mean, they've got all care, no responsibility. They've got the legislation, and they demand things, and they nominate people to the councils... but really provide, in general, provide very little in terms of financial or other support. (I-21)

I think it's frankly a bit anachronistic that the universities, most of them, are registered at the state level and they have state acts. And then their funding, and indeed all the other rules they have to follow are federal. So that is ... problematic, I think. The states from our point of view are mainly interested in what's happening with university councils and whether the staff or students should be on or off them and how corporatised they should be, etcetera, they have an unhealthy focus on that to the neglect of other activities (I-6)

Others had a more positive outlook on the role of the states, highlighting the importance of a systems perspective spanning early childhood education, schools, tertiary institutions, and local, state and Commonwealth governments.

Well, obviously, the Commonwealth is the primary public funder and policy setter for the system, has its hands on the levers, and has intentionally positioned itself in that role. States [are] very much at a lesser level of influence, in terms of higher education, but because they are the primary public sector actors for schools and other forms of education, but particularly schools and preschools, then they're a vital cog in the machinery of equity policy. (I-18)

If we view it as a system, get the front end early years right, get the middle bit right which is run by the states, which is where I think the state responsibility comes in... Viewing it as a system is why I think the state is inextricably intertwined. If we're serious about tackling equity then it's got to be all parties. I'd actually also probably put local government, and independent, and public, and private providers, particularly in early years and schools. (I-9)

The market is identified as a major factor in higher education system coordination by Clark (1983). There has been increasing use of market-based mechanism and approaches in Australian tertiary education (e.g. demand-driven funding, and QILT as a mechanism for informing the market). Norton (2016) suggested that the supply of places (through market mechanisms) is important to the participation of disadvantaged groups. The market was not identified as a prominent feature of student equity discourse through this current research. Amid general reservations about market-based approaches (equating market influences with a contraction in government support and intervention), demand-driven funding was recognised as an important factor in supporting equity outcomes.

I think the market is a lesser force in terms of student equity, simply... It isn't a level playing field. I think there has to be outreach, aspiration raising. If you let

the market, if you let the status quo work, you're going to get more and more people left behind. That's my real fear. (I-1)

I think if it's purely market-based then sometimes you won't achieve the objectives that you would want to. That's where institutional efforts and national efforts to increase participation are important. I think that of course the universities respond to the context that they find themselves in, but they also are investing significant amounts of time and energy and effort into changing the makeup of the student population at their institutions. (I-2)

The demand-driven funding system has made a huge difference, and I think it is important not to back away from those things now when we still have a gap between higher education attainment in major cities and the regions (I-1)

I also believe that the overall design of the system is by far the most important thing determining how successful it is in recruiting and graduating equity students... You could argue that this [accountability] has changed with the demand-driven funding, but even though this is not called a performance measure, the reality is, it's a very brutal performance system. (I-4)

The changes announced in the 2017 Mid-Year Economic and Fiscal Outlook (Australian Government 2017b) (capping institutional grants and linking future growth to performance and population growth) are likely to have implications for equity that warrant close attention. It is unclear, for example, whether some universities will seek to grow marginally funded load as many did in the lead up to the implementation of demand-driven funding, or whether they will endeavour to enrol students as close to their maximum grant allocations as possible.

The market represents the individual choices of over a million students in what and where to study. Understanding and responding to student needs is an important feature of market operations. One leader with international higher education experience suggested Australia was less focused on matters of student voice than they would have expected.

And for me, part of the missing bit of the picture here is, what are the students saying? So in my previous organisation I had two students on my Board of Directors. When I used to go to meetings with the department, there would almost invariably be a student representative at the meetings as well... Every single higher education agency in the UK would now not think of not having student representatives on its Board. That would just be a given. (I-14)

This perspective represents a broader interest in student engagement and student voice. Research is underway to bolster the involvement of students within institutional decision-making (Varnham 2017). TEQSA has announced more formal collaborative arrangements with student organisations (TEQSA 2017). All major student organisations have announced a Spring Agreement to cultivate collaboration and a stronger voice (Council of Australian Postgraduate Associations 2017).

Non-university higher education institutions play a role in the equity group participation. Their equity representation exceeds, on average, equity representation of some universities, and is achieved with limited access to government subsidies through Commonwealth Supported Places and the higher education loan program. The question of fair access to Commonwealth subsidy and support was a seen as a more pressing equity (or fairness) issue than equity group participation within non-university higher education institutions.

The vast majority of private providers don't get access to Commonwealth Supported Places. They have no intersection with funding from the Commonwealth Government, that's my starting point ... Most private providers receive no government funding. They receive no assistance through programs like [the] HEPPP that seek to enhance participation. The only assistance they do

get is access to FEE-HELP, for which their students pay a 25 per cent loading on their debt. (I-20)

A significant number of non-public university providers are niche providers. Some of them are somewhat broad, of course, but a number of them are niche providers who target particular client groups and industry sectors. Some providers build their programs around supporting the needs of equity groups. Particularly for sub-degree and pathways programs, providers support low SES and other disadvantaged groups who might not be able to access university. (I-20)

So, what I'm getting at there, there are public policy impediments for the private sector to engage more with people. Or to embrace equity issues. In fact, it's not equitable to actually try and enrol those students because, you know they are at least 40 per cent worse off in terms of costs of education. (I-24)

ACCOUNTABILITY CHALLENGE 4

Equity is shaped by many institutions and different timeframe considerations outside of higher education

Sector leaders recognised that there were many components to equity policy that spanned Commonwealth and state governments, school, early childhood and vocational education systems, and higher education institutions. This complexity of many potential stakeholders contributes to challenges in aligning equity policy, performance and accountability.

Resourcing Equity Objectives

The accountability question, *by what means*, is relevant for understanding stakeholder perspectives on the resourcing of equity objectives. The 'Policy' and 'Planning' sections of this research report highlight there is considerable public investment in equity-specific and general funding programs. There is greater transparency on equity-specific programs than on the equity components of general funding programs (see Tables 4 and 6). The leader interviews sought to assess awareness of both equity-specific and general funding programs.

Leaders were asked to estimate the proportion of institution and system of resourcing associated with student equity objectives at a system level. This proved to be a more difficult question for leaders to answer than was intended in the interview protocol and design. Some leaders sought to clarify whether the question was intended to cover 'direct' or 'indirect' financing. The interpretation of the question was left to the interview participant.

Of the 24 leaders interviewed, nine did not make an estimate. Where an estimate was made, the average estimate was 4.9 per cent of system revenue, although this average was influenced by a single outlier of 35 per cent. Excluding this figure, the mean estimate was 2.7 per cent of revenue. These estimates suggest that equity is more frequently perceived in terms of equity program spending, rather than a system-wide understanding of expenditure involving base and supplemental, or direct and indirect funding (consistent with a 35 per cent estimate).

A sceptical interpretation of responses to this resourcing question is that it is easier to consign equity to second or third order importance when equity revenues can be rounded down to zero per cent of institutional financing. Around 15 universities derive 0.5 per cent or less of their revenue from equity-specific programs (see Appendix 2).

The proportion of institution income derived from equity programs can be seen through the prism of stratification and geography in Australian higher education (see Figure 1). Institutions that are research intensive and located in major cities are less likely to enrol students with equity characteristics. They generate more international and research revenue, making equity program funding peripheral in real and proportionate terms. Institutions operating mainly in regional communities are less likely to generate international and research funding, and are more reliant on equity program funding. They also incur extra costs as they take on more prominent community service functions.

In regional universities, what the base funding is used for becomes much more complex. It's because we have to do so much with that funding. We are absolute anchor institutions for our regions. It comes down to the fact that, when you go to the regions, the anchor institutions are the universities, and hospitals. They're the ones embedded in the region, that stay in the region. Businesses come and go. Industries come and go. But it really it is your universities and hospitals, and sometimes government departments and agencies, that are the major employers and, really, the backbone of the towns. (I-1)

The absence of equity program funding does not equate to an absence of equity activity. Group of Eight universities are often portrayed as underperforming on equity indicators, but do play an active role in equity. As one Group of Eight leader indicated, the driver of their institution's equity agenda is internal, not financial assistance from governments.

That's just part of a general thing that equity's got to be everywhere. You can't squib on it, really. You've got to really work at it.....It wasn't the state. It wasn't really even the federal government. We've never got a lot of money out of the equity program, because we never had very high proportions of low SES students, and we've never had very high proportions of Indigenous students. It wasn't a response to the funding, it was an institutional response. (I-12)

Equity programs across institutions are funded with or without access to equity program funds, but there is limited information available on how much is spent. This also represents a weakness in accountability for equity objectives. One cannot say whether any institution's spending is efficient or effective in the pursuit of equity goals when transparency of income and expenditure is low. The Department of Education and Training has commissioned projects to examine issues such as economies of scale in enrolling low socioeconomic status students, and development of student equity ranking index. These projects may result in better transparency of equity revenue and expenditure and outcomes. Better tracking of equity revenue and expenditure could result in the higher administrative and reporting costs. Any improvements to reporting should endeavour to do so in the most efficient possible manner using clear, consistently applied definitions.

My sense is tax payers need to know that the institutions are running effectively. We have TEQSA.... I don't think we do want to go to a state where a university has to account for every dollar, but overall it should be clear how it's performing, and that its performance is monitored through data, and through TEQSA. (I-1)

I think you could get yourself into some definitional knots. You'll recall that when you asked me that question, I hesitated and made a distinction between direct equity funding and other funding, and by direct equity funding, I meant things like [the] HEPPP and related programs, which would certainly be in the single digit percentages of total funding. If you start counting all of the participation-related funding, then you get into difficult questions of what proportion of that can you say is an equity measure, so I think it's easier to separate the two. (I-17)

One can overstate the importance of tracking student equity finances in improving performance against student equity goals. Any limitations in tracking student equity finance

have not prevented an improvement in student equity participation and outcomes. Demanddriven funding was again cited by many leaders as important to increasing equity enrolments.

I think if you have a look at the objectives since the introduction of the demanddriven system we have seen an increase in nearly all of the areas that have been targeted to increase participation. We're not there yet, but we are certainly making inroads into it. (I-2)

This does reveal a continuing tension in how the resourcing of equity is understood. If demand-driven funding, the general funding that applies to all students, is important for equity, how do we accommodate the cost in our understanding of how student equity is resourced. What are the accountability implications of sector leaders (and as described in later sections, institution managers) seeing equity resourcing in equity-specific funding terms?

There were signs of discontent in terms of system transparency and performance indicators. Only 30 per cent of leaders agreed with the proposition that there was adequate transparency on progress against student equity objectives. This has significant implications for not just how we understand the resourcing of student equity, but how we define, measure and evaluate equity performance.

I have been a vehement critic of the data for a long time. What disappoints me with HEIMS and other similar datasets, is that we could use smarter analytics, work out the best definer, the best definition for higher education purposes. It wouldn't take long. The [current] geographic location [indicator] is at best flimsy. (I-7)

A perception that transparency could be improved should not be interpreted as there being no transparency. Student equity is a well-studied area which could benefit from better systematic aggregation and structuring of existing information.

Well, it's a very well-studied area. There's an enormous amount of information and analysis out there about most dimensions that you can think of...so, certainly that sort of information is important, but I'm not sure that there's any great lack of it. (I-18)

ACCOUNTABILITY CHALLENGE 5

Public investment in financing student equity is not well understood

Interviews with sector leaders and surveys of institution managers highlighted uncertainty about the full extent of Commonwealth funding for student equity, or the proportion of institutional income linked to student equity. Knowledge of equity-specific program funding is far better than knowledge of other forms of public expenditure in support of equity. Accountability for equity can be consigned to lower order importance where focus is placed on equity-specific revenues, which in many cases represent a low proportion of institutional financing.

Regulating Student Equity

The accountability question, by what consequences, is stakeholder understandings of how equity objectives are regulated. The regulatory environment for higher education influences the institutional composition of the system, the distribution of finances across the institutions, the compliance regime with which institutions must comply, and performance criteria that must be met to maintain access to a licence to operate. Preceding sections address Commonwealth and state dimensions of regulation, and the financial implications of student equity. Within this section attention is directed towards leaders' perspectives on the role of TEQSA and the Higher Education Standards, and importance of self-regulation through institutional governance.

The system can be considered as transitioning from an interim Higher Education Standards Framework (without reference to equity) to a more mature standards framework (with embedded reference to equity). Stakeholders were generally positive about the content and format of the 2015 Threshold Standards, but were unsure of the ways in which TEQSA would engage with equity dimensions of the revised Standards Framework. Some respondents saw equity as peripheral, others as central to the role of TEQSA. Concerns were raised around the role TEQSA might evolve to play, an echo of teething problems in TEQSA's establishment and subsequent changes to its focus and resourcing. Important to TEQSA's role in progressing equity will be an adequate level of resourcing to fulfil its regulatory functions. System wide quality assurance functions on various policy values, including student equity, will be harder to fulfil if emphasis is mainly on assessing applications of new registrants.

TEQSA is responsible for assuring that higher education providers comply with the higher education standards framework, which now includes diversity and equity standards. One can expect TEQSA to play a role in student equity given its role in assuring the sector against the Standards. Accountability for equity performance will require more than regulatory oversight. Equity is not currently a feature of TEQSA's Risk Assessment Framework.

Leaders were positive about the content and format of the 2015 Threshold Standards, but were unsure of the ways in which TEQSA would engage with equity dimensions of the 2015 Standards. Many leaders perceived that student equity was peripheral to TEQSA's operations.

Standards Framework

The new higher education standards framework is still quite new, so not many organisations have been accredited against that new framework.... I fully support it. Thanks to ... the team who put all that together, but it's too early. I'm unaware of any talk around how that's working out with accreditation, yet. (I-11)

So the standards and the regulatory framework, I think, are perfectly suited to support and promote equity and equity agenda, but it's more in terms of the individual institutions commitment and outcomes. (I-16)

Application of Equity Standards

So equity is not very important to TEQSA. It's not really their main brief. (I-4)

Well at the moment, it's not [important], because it's not one of the 12 indicators that we use about risk. (I-15)

I don't think a university with a weak equity profile will actually get massive red flags from TEQSA and be at risk of de-registration because of it. (I-22)

If equity is not currently high on TEQSA's risk-based approach to regulation, strengthening accountability for equity performance will require additional policy levers. Many leaders saw equity program financing as an important mechanism in this regard.

The funding levers are absolutely vital in today's world, so without Commonwealth support, funding support directed towards equity objectives, yeah, you won't get very far. (I-16)

I think there is a role for special funding for a number of reasons. I think, first of all, it creates a visibility, a profile for the particular efforts that are being made in relation to certain groups. I think that in my experience in higher education, providers respond to even relatively small elements of dedicated funding, and see what they can do to try and access them. And therefore, as an incentive for certain kinds of behaviour, I think they can be important and powerful. I think that probably, we exist with a mindset that would hope that one day the need for them is not there because everyone who can benefit from higher education is progressing. (I-14)

The progression from elite to mass and universal higher education is well underway. The system of today is accommodating a more diverse group of students than those enrolled five, 10 or 20 years ago. The transition away from elite conceptualisations of higher education confronts challenges referenced by some of the leaders interviewed.

I think it is really important and because we used to know at [university A] that students who came were very bright and who had come from areas where their way of living in society wasn't typical of a person who would be thinking of entering ... how they used to feel so disaffected because [university A]... used to select 80 per cent of the intake from 20 schools... You will remember the difficulty ... [the Vice-Chancellor] even agreed to have the word 'equity' in the strategic plan. (I-15)

I would say, given the global shift towards universal access, we're getting better. I have to believe that or my whole career's been a waste of time. (I-17)

The combined effects of policy, leadership, governance and staff commitment to equity have been central to improving equity participation at some institutions.

Look, it's most successful, in my experience, where it's not just being driven top-down. If it's not committed to at the top, in terms of the governing, the major governing bodies and indeed the senior management, it's not going to get very far. But the very best is when other people in the organisation, both academic and support people actually think of this as an important part of their contribution as well, if you can get that, then everybody can celebrate the successes, commit to making things better. (I-16)

Where institutions are making positive changes to improve student equity, the sustainability of arrangements hinges on embedding equity within the governance of the university.

You've been around the sector long enough, if you look around the sector there's loads of wonderful ideas, but there's also loads of examples where the idea has not resulted in full execution, full realisation of aims and being institutionalised or adopted into BAU practise. If the funding goes away, if the exec changes, if the two or three people that kind of care, or the key architect move onto their next roles, the thing will just wither and die. (I-9)

My theory is that good governance...means that a council of a publicly funded university has responsibilities to reflect the communities it serves through its equity values...So how much of it is embedded? It's in our strategic plan. So

we do have targets to report to council. But a new Vice-Chancellor can conceivably change all that, of course. Much harder to change a council? ... That's why I come back to it being embedded in the good governance of the university, at the top. (I-7)

The embedding of equity-related considerations within university governance is already a feature of the regulatory environment in which universities operate. Appointments to Victorian university councils, for example, require demonstrated effort to fill skills gaps and represent the diversity of the Victorian community (Department of Premier and Cabinet 2017). However, few universities make their skills matrices publicly available. Integrating equity within governance will involve deft handling of the associated political sensitivities. Several leaders expressed reservations about state and equity influences on governing board composition.

If you start locking things into legislation and locking things into state government appointments, then ... I mean, the key to the future successes of universities as a general statement is a regulatory and policy environment that enables it to be as responsive and adaptive, and, I hate this word, but nimble as possible. (I-21)

ACCOUNTABILITY CHALLENGE 6

Student equity is not a sufficiently prominent feature of the higher education regulatory environment

Interviews with sector leaders highlighted support for the new Higher Education Standards Framework, but with reservations around the role that the Tertiary Equity Quality and Standards Agency (TEQSA) might play in accountability for student equity. There is scope for TEQSA to increase the level of attention given to student equity. Leaders highlighted limits to the regulator's influence in matters of student equity and the importance of embedding student equity in institutional governance to progress student equity goals and enhance accountability for student equity.

Manager Survey Findings

Manager survey responses align with and affirm the findings from policy and planning analysis and the interviews with leaders (Table 10). There was strong agreement for the statement that equity was important to the expressed mission of respondent institutions. As questions delved deeper into institutional prioritisation, resource allocation and transparency a decline is observed in manager level of agreement. Less than 20 per cent of respondents agreed with the proposition that their institutions equity expenditure was effective and efficient. Managers were asked to estimate revenue and expenditure associated with their institutions student equity objectives. Less than a third (19/61) of respondents provided a numerical estimate, with an average estimate of 4.9 per cent.

Table 10: Select manager survey responses

	Proportion agree/ strongly agree	Mean	n
Student equity is important to the expressed mission of my institution.	91.8%	4.2	61
My institution's student equity objectives are designed to align with the mission and values of my institution.	77.0%	4.0	61
My institution's student equity objectives are designed to align with government student equity policy.	68.9%	3.8	61
Information about the performance of my institution against student equity objectives is publicly available.	47.5%	3.3	59
Resources (financial and staff) allocated by my institution to support its student equity objectives are adequate.	21.3%	2.5	61
Expenditure allocated towards student equity objectives at my institution is effective and efficient.	19.7%	2.7	61

Strongly disagree = 1, disagree = 2, neutral = 3, agree = 4, strongly agree = 5.

Strengthening Accountability for Equity in Higher Education

Economic, social and technological change makes it a strategic necessity for more Australians to develop advanced capabilities and fulfil their learning potential. Our social wellbeing and economic productivity suffers collectively if we do not develop and harness the skills of all.

Consistent with this policy logic, recent decades have witnessed a transition from an elite higher education system, accessible to the few, to a high-participation system, accessible to all. A degree is now achievable for all capable students who put in the hard work.

The transition to a high participation system has been financed by a marked uplift in base funding (both Commonwealth and student contributions) and targeted equity programs. Equity enrolments have grown, but underrepresentation persists. Not all capable students fulfil their potential.

The size of public investment and importance of student equity as a factor in social and economic development warrants close attention on how accountability for equity can be strengthened.

As the investigations for this report have illustrated, equity may be embedded in system design and university strategies, but this is insufficient for improving equity outcomes if not combined with accountability. As the higher education sector stands on the cusp of major reforms, there are opportunities to embed student equity within new policy paradigms. Policymakers and institutions are encouraged to reflect on the successes and limitations of current policy drivers. A balance must be struck between institutional autonomy and the need to demonstrate accountability for policy goals and public funds.

Seven key drivers and shapers of equity in higher education were identified and form a strategic checklist that policymakers and higher education stakeholders are encouraged to consider in dialog and conversation around the future of equity in Australian higher education:

- 1. Drivers of higher education system expansion this is the big picture economic, social and political factors that shape the demand for education, what courses are offered, and who gets left behind.
- 2. Market expectations demand for education services is increasing and is shaped by expectations of accessibility, affordability, quality and outcomes. Some cohorts have a stronger knowledge base on which to manage these trade-offs than others.
- 3. Electorate values which incorporates a two-way dialogue between public policy developments and directions in education, and the public expectations of the role of education and what it delivers for society. There are upper and lower limits to what the electorate will tolerate in public investment in higher education equity objectives
- 4. Equity financing policy which comprises both the direct funding of equity programs and underlying base funding of public and student contributions. As overall financing increases, so too do expectations of value for money for public and private outlays.
- Regulatory environment which focuses on how equity in higher education is governed and regulated, acknowledging that system complexity impedes visibility of the multi-faceted components of equity policy for all but a few of the most knowledgeable policy experts.
- 6. Institution mission which focuses on institutional autonomy for universities to manage its corporate business, which now needs to be balanced against accountability for public subsidies including those for equity students.

7. Evaluation — which is necessary for effective policy and program design so policymakers and institutions know what works.

These drivers and their relevance to strengthening equity are illustrated in Table 11.

Table 11: Checklist for assessing accountability for equity in higher education

System driver	Consideration	Current practice
1. Drivers of higher education system expansion	Are the drivers of demand consistent with equity goals made explicit?	Undergraduate applications, offers and admissions reports.
2. Market expectations	Do disadvantaged or underrepresented students have effective access information to inform their decision making about higher education?	 Quality Indicators for Learning and Teaching. Transparency in admissions. HEPPP.
3. Electorate values	Are electoral values around the importance of student equity to higher education policy monitored and published?	Consultation on higher education policy, e.g. <i>Driving Innovation Fairness</i> and Excellence in Higher Education.
4. Equity financing	Are the equity components of government and private investment in higher education identified and published?	 Portfolio Budget Statements. Additional estimates statements. Department annual reports. HEIMS determinations app. University annual reports.
5. Regulatory environment	Are the equity components of the regulatory environment identified and published?	Department websites.TEQSA guidance notes.
6. Institution mission	Are the student equity goals and outcomes of institutions published?	Strategic plans.Annual reports.Second tier equity plans/reports
7. Evaluation	Are social and economic outcomes of higher education published by equity groups?	Cohort completion studies.Graduate outcomes survey.

Strategic priorities for change

Some of these drivers and shapers of equity take place at a macro level, springing from broad economic and cultural trends. Other drivers stem from Australian government education policy and the institutional responses from universities. It is this latter, more 'operational', sphere that policy can have a greater direct impact on equity in outcomes in higher education.

The strengthening of accountability is best seen however as a system level challenge, resolved by progressively and collaboratively embedding strategic equity goals across the system when opportune to do so.

The report identifies six challenges for equity and accountability in higher education through research into policy and planning, interviews with sector leaders and surveys of managers.

Through a clustering and refinement process, report findings were condensed into four strategic priorities that can guide policymakers to inform an equity policy and accountability framework—a process to guide good policy making—and these findings can be condensed down into four areas of focus:

1. Refine equity goals.

- 2. Improve information management.
- 3. Embed student equity goals across the higher education system.
- 4. Analyse, report and communicate outcomes.

Refine equity goals

The current equity groups were first identified over 30 years ago and since then both Australian society and higher education have changed significantly. The rapid evolution of a higher education system from a small scale sector to a much bigger system with wide participation across society is an historic shift. The Department of Education and Training is currently reviewing equity groups and changes are likely to be made to their composition.

The report finds that some groups are prioritised under an equity rubric by institutions that do not form part of the Commonwealth's equity priorities. A means of reconciling and respecting the priorities of institutions and maintaining a focus on Commonwealth priorities is needed. We must not also lose sight of the individual. The national picture may play out in local settings but inclusion and exclusion still operates and can have profound impact at an individual level.

A multi-tiered approach could form the basis of a new way of thinking about equity. The top tier would represent the core national priorities, linked to specific funding and other policy interventions. Below may be groups and circumstances that do not fit criteria of national priorities but have relevance at a local level and warrant continued monitoring. Below this, policies that ensure that individuals who experience educational disadvantage are well supported and accommodated could be made more explicit. Cyclical review of the tiers may see the success of national priority groups relegated to second tier monitoring status, and elevation of second tier groups to national priority status where there is evidence to do so. This can be considered as a dynamic feedback loop rather than an intermittent inquiry-based approach.

Other challenges include balancing the need to make changes in the composition of equity groups while retaining longitudinal data on the individuals that make up equity groups; and the need to address equity issues when many individuals could be defined as potentially belonging to more than one equity group.

Improve information management

The collection of the right data is a critical enabler of transparency and accountability in equity. While there is a growing body of data on equity in higher education, there are many gaps in information. Information on student equity is described in many and diverse ways within policy and planning documents examined in this research. A fragmented approach to student equity makes it more difficult to assess system and institutional performance against student equity goals. One cannot for example, readily identify base funding for the participation of students from equity groups. The fragmented approach to student equity contributes to limitations in current accountability practices. There is a need to harmonise reporting and reporting standards and definitions to enable researchers to compare and contrast institutions.

To produce better quality research, policymakers need better quality data — and this means clarifying what data is collected, improving how it is managed, and making better use of the data that is already collected. This report for example, includes new perspectives on the higher education data collection that have not been previously published. Data on equity group EFTSL in Commonwealth supported places by funding cluster has allowed base funding for equity groups to be calculated. Multiple equity group membership data has allowed 'any equity group' representation to be modelled. This and other data sits within data repositories awaiting analysis, and a more strategic approach to utilisation of this data is warranted.

One challenge in improving information management is the tension between balancing institutional autonomy with consistency in reporting across institutions. Claims to institutional autonomy can be used to thwart attempts to strengthen and standardise data collection and such claims need to be assessed on their real merits.

There is also a process issue with data collection — who is engaged in data collection policy and what is the process for discussing and debating change in data acquisition?

Embed student equity goals across the higher education system

In embedding student equity policy goals across the system, attention should be given to how institutional performance can be linked to more meaningful financial and regulatory consequences than in place today.

Equity is embedded in a variety of policy instruments, but there is limited visibility over how institutions comply with various administrative or funding requirements. Much of this compliance is left to institutional governance processes as self-accrediting institutions. Student equity does not currently feature in TEQSA's risk framework, and institutions are unlikely to face regulatory consequences on the basis of their equity compliance regime, profile and performance.

More could be done to leverage the full public investment in student equity in pursuit of student equity goals. Public subsidies should flow to those institutions who can deliver accessibility and quality, but under current funding arrangements, prestige and exclusivity can bring financial rewards that are not shared with comparatively few equity students. Some non-university providers would appear to make important contributions to student equity, but do so with limited access to public subsidies.

Policymakers need to assess how we better link equity performance and institutional equity support. The Commonwealth is moving towards some form of performance funding, providing opportunities to further embed equity as a design feature of a fair, accessible high-quality system. Questions remain on how we move to this in a consensus manner that is sustainable and durable.

Many equity goals are expressed at an institutional level, opening questions around accountability for voluntary commitments. Greater transparency and more significant consequences for progress against equity goals might see a more conservative approach to goal setting. Institutions may be less inclined to pursue a bold aspirational agenda. The 'soft bigotry of low expectations' could be incentivised as the norm.

The risks of unintended consequences are high — but that should not prevent the sector from critically re-examining equity goals, ensuring they are measured and managed in an appropriate way, and embedded across the system.

Analyse, report and communicate outcomes

To improve equity outcomes we need better reporting of data, better analysis of broader datasets and better communication of the outcomes of data analysis to all stakeholders. Because reporting is so fragmented, we are not sure what best practice actually looks like and there is a need for a conversation about what this means and how we reach it sectorwide. The Australian Government can play a key role in this space. It is already the custodian of important national datasets and how they interlink. It can set the parameters by which data is collected and reported. This can extend from articulating specific requirements for information within HEIMS and QILT to more subtle expectations around what constitutes core requirements of a strategic plan or annual report.

There is also some need to think more broadly about equity in higher education, particularly in the ways in which data is comparable or can be linked across sectors. The transition from school or TAFE to university should not mean entirely new conceptualisations of equity and

how it is measured and tracked, but this is ostensibly the case today. The future of equity in higher education can be found in our schools and in our Centrelink offices, but most students transition into university without a referral.

These are some of the challenges and implications that could be addressed by an Operational Framework for Equity and Accountability, as illustrated in Table 12.

The research in this report has made a logical case for four areas of focus and it is through these lenses that we need to concentrate to identify the challenges and opportunities in advancing equity in higher education.

Table 12: An Operational Framework for Equity and Accountability

Areas of focus	Challenges	Implications
Refine equity goals	Near universal participation in higher education requires a new approach to equity policy that transcends a 'set and forget' focus on designated groups.	The individual, local and national dimensions of equity policy should be made more transparent. A dynamic process by which equity goals are articulated could allow: • national goals to be affirmed and renewed, • institutions to be more explicit in describing their role in social and economic development • clearer messaging to all students about access to support to achieve their learning potential irrespective of their unique circumstances.
Improve information management	A large amount of information is collected by the sector to address government and institutional requirements, but privacy and other concerns render this data under-utilised for equity-related purposes.	Student equity should be a stronger driver of higher education data collection, data access and reporting. Equity data protocols should be developed that ensure: • data relevant to national and institutional equity goals is collected consistently • experiences and attributes of students relevant to equity goals can be tracked longitudinally (e.g. unique student identifiers) • researchers and policymakers can exploit the full value of equity-related information.
Embed student equity goals across the higher education system	Much of student equity policy is hidden in plain sight, integrated within higher system design. Building awareness of the big equity policy picture has proven to be difficult. Changing the big equity picture to fully embed equity goals spans many policies and stakeholders.	The big picture of student equity spanning national goals, relevant policies, institutional practice and individual entitlement should be documented and publicised. The funding and regulatory levers of higher education policy, should have a stronger equity focus. This should include: Inking equity performance to a higher proportion of Commonwealth subsidy including equity performance as a consideration of provider categories and provider registration requiring all providers to be transparent about equity goals and performance.
Analyse, report and communicate outcomes	Fragmented group level reporting of equity in higher education limits an appreciation of the big picture. Important connections between schools, vocational education, social welfare, and the tax and transfers system are not fully realised.	Analysis of equity should close the loop between policy goals, implementation and evaluation at micro and macro level. Evaluation and research that bridges policy and practice would be facilitated by: • reporting frameworks for describing equity goals and performance (e.g. Equity Maps (Zacharias 2017)) • hypothecating a higher proportion of total equity funding to research and evaluation.

Conclusion

The research sought to understand the nature of student equity objectives, how these objectives are set, how they are advanced, and who is accountable for them. The research aimed to quantify weaknesses in accountability for equity performance, and develop a framework that might assist interested stakeholders in the higher education system to strengthen accountability for student equity across the system.

Student equity is integral to higher education system design and operations, but is less prominent in important evaluation and regulatory dimensions of policy and planning documents. Close to half of all domestic students belong to an equity group, supported by substantial Commonwealth investment. However, some equity goals are not funded, some equity goals are funded but not effectively evaluated, and some forms of evaluation are not linked to an explicit equity goal. The importance of student equity warrants stronger accountability.

The research Fellowship explored policy and planning systems across Australian universities and it incorporated the candid views of institutional leaders and program managers. In assessing all of this information, findings were made and these were used to inform the development of an Operational Framework for Equity and Accountability in the Australian higher education sector.

The report finds that in the context of an increasingly complex and dynamic higher education system in which the case for equity is now more of an imperative than an option, policymakers can no longer rely on incremental changes of an ad hoc nature driven by a steam of differentiated research recommendations. Instead, there is now a compelling case to secure positive change at a system level though a process-driven approach centred on the four key areas nominated in this report — refining equity goals; improving information management; embedding student equity goals across the higher education system; and analysing, reporting and communicating outcomes.

A constructive way forward is to develop leadership and wide engagement in ongoing conversations in these four key areas, from which we can minimise friction and conflict, build trust and consensus, and align the public and private interest.

The pathway to equity in higher education through the proposed operational framework is the beginning of an open process rather than a prescriptive agenda, one that if implemented purposefully is capable of developing a widely-accepted national equity narrative that makes a significant and ongoing contribution to Australian public policy.

References

- ACIL Allen (2017). Evaluation of The Higher Education Participation and Partnerships Program, ACIL Allen Consulting. Melbourne.
- Anderson, I. (2015). The crisis of Australia's indigenous policy. Meanjin, 74(3), 54.
- Australian Bureau of Statistics (2017) 3218.0 Regional Population Growth, Australia, 2016.
- Australian Government (2014) National Commission of Audit. Phase Two Report.
- Australian Government (2016) *Driving Innovation, Fairness and Excellence in Australian Higher Education*, Australian Government 2016, Accessed 31 October 2017, https://docs.education.gov.au/documents/driving-innovation-fairness-and-excellence-australian-education
- Australian Government (2017a) Improving the transparency of higher education admissions:

 Joint higher education sector and Australian Government implementation plan.

 Retrieved 31 January 2018 from

 https://docs.education.gov.au/system/files/doc/other/admissions_tranpsarency_imple
 mentation_plan_june_2017.pdf
- Australian Government (2017b) *Mid-Year Economic and Fiscal Outlook*. Retrieved December 18 2017 from http://www.budget.gov.au/2017-18/content/myefo/download/MYEFO_2017-18.pdf
- Australian National Audit Office (2014) Better Practice Guides Retrieved November 1 2017 from https://www.anao.gov.au/pubs/better-practice-guides
- Australian National University (2017) Council Agenda 1 December 2017. Retrieved 19

 December 2017 from http://www.anu.edu.au/files/committee/nonconcclag011217.pdf
- Behrendt, L. Y., Larkin, S., Griew, R., & Kelly, P. (2012). Review of higher education access and outcomes for Aboriginal and Torres Strait Islander people. Australian Government.
- Brett, M. (2016). Disability and Australian higher education: Policy drivers for increasing participation. In Harvey, A., Burnheim, C., and Brett, M. (eds) *Student Equity in Australian Higher Education Twenty-five years of A Fair Chance for All* (pp. 87-108). Springer. Singapore.
- Brett, M. & Harvey, A. (2017). Advancing Equity in the Australian Higher Education System. In James, R., French, S. and Kelly, P. (Eds.), *Visions for Australian Tertiary Education*. Melbourne Centre for the Study of Higher Education, The University of Melbourne.
- Bridgman, P., & Davis, G. (2004). The Australian policy handbook. Allen & Unwin.
- Burke, J. C. (2005a). The Many Faces of Accountability. In Burke (ed) *Achieving accountability in higher education: Balancing public, academic, and market demands.* (pp. 2-24) San Francisco, CA: Jossey-Bass.
- Burke, J. C. (2005b). The Three Corners of the Accountability Triangle. Serving All, Submitting to None. In Burke (ed) *Achieving accountability in higher education:*Balancing public, academic, and market demands. (pp. 296-324) San Francisco, CA: Jossey-Bass.
 p323
- Burke, J. C., & Minassians, H. P. (2002). Reporting indicators: What do they indicate? *New directions for institutional research*, 2002(116), 33-58.
- Burke, J. C., & Minassians, H. P. (2003). *Performance Reporting:" real" Accountability Or Accountability" lite": Seventh Annual Survey 2003.* New York City: Nelson A. Rockefeller Institute of Government, State University of New York.
- Clark, B. R. (1983). The higher education system: Academic organization in cross-national perspective. University of California Press.
- Commonwealth of Australia (1990) 1990, A Fair Chance for All: Higher Education That's Within Everyone's Reach, AGPS, Canberra
- Considine, M. (2005). *Making public policy: Institutions, actors, strategies.* Cambridge, UK; Malden, MA: Polity Press.

- Corden, W. (2005). Australian universities: Moscow on the Molonglo. *Quadrant*, 49(11), 7. Council of Australian Postgraduate Associations (2017) *Students unite in historic agreement to garner greater force* [Media Release]. Retrieved 18 December 2017 from http://www.capa.edu.au/students-unite-historic-agreement-garner-greater-force/
- Davis, G. (2017). The Australian idea of a university. Melbourne Univ. Publishing.
- Department of Education and Training (2014) Higher Education Report 2011-2013.
- Department of Education and Training (2015) Department of Education and Training Portfolio Budget Statement 2015-16
- Department of Education and Training (2017a) Department of Education and Training Portfolio Budget Statement 2017-18
- Department of Education and Training (2017b) Access and Participation. Retrieved December 12 2017 from https://www.education.gov.au/access-and-participation
- Department of Education and Training (2017c) Online Submissions Driving Innovation, Fairness and Excellence in Australian Higher Education. Retrieved 11 December 2017 from https://submissions.education.gov.au/forms/archive/ahe/pages/default
- Department of Education and Training (2017d) *Higher education providers' 2017 Commonwealth Grant Scheme funding agreements.* Retrieved 25 November 2017 from https://docs.education.gov.au/node/42251
- Department of Education and Training (2018) uCube. Retrieved 21 January 2018 from http://highereducationstatistics.education.gov.au/
- Department of Premier and Cabinet (2017) *Appointment and Remuneration Guidelines.* 2017. Retrieved December 12 2017 from https://www.dpc.vic.gov.au/index.php/policies/governance/appointment-and-remuneration-guidelines
- Department of Prime Minister and Cabinet (2014) Roles and responsibilities in education Part B: Vocational Education and Training and Higher Education. Issues Paper 4.

 December 2014
- Department of Prime Minister and Cabinet (2017a) *Policy Implementation*. Retrieved November 1 2017 from https://www.pmc.gov.au/government/policy-implementation
- Department of Prime Minister and Cabinet (2017b) Department of Prime Minister and Cabinet Portfolio Budget Statement 2017-18
- Ebrahim, A. (2003). Accountability in practice: Mechanisms for NGOs. *World development*, 31(5), 813-829.
- Ebrahim, A. (2009). Placing the normative logics of accountability in "thick" perspective. American Behavioral Scientist, 52(6), 885-904.
- Forsyth, H. (2014). *History of the Modern Australian University*. NewSouth Publishing. Sydney.
- Halsey, J. (2017) Discussion Paper for the Independent Review into Regional, Rural and Remote Education. Retrieved 20 November 2017

 https://docs.education.gov.au/documents/discussion-paper-independent-review-regional-rural-and-remote-education
- Harvey, A., Burnheim, C., & Brett, M. (2016). Towards a fairer chance for all: revising the Australian student equity framework. In Harvey, A., Burnheim, C., and Brett, M. (eds) Student Equity in Australian Higher Education Twenty-five years of A Fair Chance for All (pp. 87-108). Springer Singapore.
- Institute for Social Science Research (2017) Review of Identified Equity Groups.

 Consultation Paper. University of Queensland.
- James, R., & McInnis, C. (2005). Equity policy in Australian higher education: A case of policy stasis. In Gornitzka, A., Kogan, M., and Amaral, A. (eds) *Reform and change in higher education* (pp. 227-244). Springer, Dordrecht.
- Karmel, P. (1990). Higher Education--Tensions and Balance. *Journal of Tertiary Educational Administration*, 12(2), 329-337.

- KPMG (2015) Department of Education and Training Evaluation of Disability Support

 Program Final Report. Retrieved 1 August 2017 from

 https://docs.education.gov.au/system/files/doc/other/dsp_evaluation_report_final_jun
 e 2015.pdf
- Lacy, W., Croucher, G., Brett, A., & Mueller, R. (2017). *Australian Universities at a Crossroads: Insights from their leaders and implications for the Future*. Melbourne Centre for the Study of Higher Education and Berkeley Centre for Studies in Higher Education.
- Lee Dow, K., & Braithwaite, V. (2013). *Review of higher education regulation report.*Department of Industry, Innovation, Climate Change, Science, Research and Tertiary Education Commonwealth of Australia
- Macintyre, S. (2015). Is there a crisis in Australian democracy?. Meanjin, 74(3), 183.
- Marginson, S. (2016). The worldwide trend to high participation higher education: Dynamics of social stratification in inclusive systems. *Higher Education*, 72(4), 413-434.
- Massy, W. F. (2003). Honoring the trust. Quality and cost containment in higher education. Bolton: Anker Publishing.
- Massy, W. F. (2016). Reengineering the university: How to be mission centered, market smart, and margin conscious. John Hopkins University Press.
- Milne, C. (2015). Why the future depends on restoring democracy. *Meanjin*, 74(3), 20. National Board of Employment, Education and Training (NBEET), (1996) *Equality, Diversity and Excellence: Advancing the National Higher Education Equity Framework*, Canberra: AGPS.
- NCSEHE (2018) 2017 Equity Fellows. Retrieved 24 May 2018 from https://www.ncsehe.edu.au/2017-equity-fellows/
- Norton, A. (2013). *Mapping Australian higher education: 2013 version*. Melbourne: Grattan Institute.
- Norton, A. (2016). *Equity and markets*. In Harvey, A., Burnheim, C., and Brett, M. (eds) *Student Equity in Australian Higher Education Twenty-five years of A Fair Chance for All* (pp. 183-206). Springer Singapore.
- Orr, J. (2012) Australian Corporate Universities and the Corporations Act. *International Journal of Law and Education*. 17(2) pp123-148
- Philips KPA (2012) Review of Reporting Requirements for Australian Universities. Final report. Retrieved 1 November 2017 from http://www.lhmartininstitute.edu.au/userfiles/files/news-media/FinalReportReviewofReportingRequirementsForUniversities.pdf
- Pollard, L. (2017) The Clever Country: The importance of investing in regional and remote students. Retrieved December 14 2017 from https://www.ncsehe.edu.au/event/the-clever-country-the-importance-of-investing-in-regional-and-remote-students/
- TEQSA (2017) TEQSA continues to strengthen ties with students [Media release]. Retrieved December 16 from https://www.teqsa.gov.au/latest-news/articles/teqsa-continues-strengthen-ties-students
- Trow, M. (1973). *Problems in the Transition from Elite to Mass Higher Education*. Carnegie Commission on Higher Education. University of California Berkeley
- Varnham, S. (2017) Working with students for students: Creating a culture of partnership towards enhancement. TEQSA Conference. Melbourne. 2017. Retrieved December 16 2017 from http://hes.edu.au/assets/TEQSA/Presentation-files-2017/A3.-Sally-Varnham-day-3.pdf
- Zacharias, N. (2017). The Australian student Equity Program and institutional change:

 Paradigm shift or business as usual? Equity Fellowship Final Report. The National
 Centre for Student Equity in Higher Education (NCSEHE). Curtin University: Perth.

Appendix 1: Survey and Interview Protocol

SURVEY

Project Title: Equity Performance and Accountability

Please answer the following questions based on your knowledge of the institution that you are primarily affiliated or associated with.

SECTION 1: INSTITUTIONAL SETTING

1. What	best describes the institution where you are employed?
	Australian university
	Higher education provider
	Other
2. When	e is the institution of your employment headquartered?
	State capital city
	Other
3. How	many students are enrolled with the institution of your employment?
	Less than 10,000
	Between 10,000 and 20,000
	Between 20,000 and 30,000
	Between 30,000 and 40,000
	More than 40,000
Other (p	please specify):
4. What	best describes your professional responsibilities?
	Higher education senior manager – e.g. responsible managing range of functions
	Higher education manager – e.g. responsible for a managing specific function
	Higher education professional – e.g. specific professional responsibilities
	Other
5. What	best describes your higher education equity focus?
	Student equity is a component of my responsibilities
	Student equity is the primary focus of my responsibilities

SECTION 2: STUDENT EQUITY OBJECTIVES AND IMPLEMENTATION

6. To what extent do you agree or disagree with the following statement?						
	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	Not applicable
Student equity is important to the expressed mission of my institution.						
Student equity objectives are described in the strategic plan (or equivalent) of my institution.						
My institution's strategic plan (or equivalent) differentiates its student equity objectives (e.g. multiple group objectives, input/output measures).						
Progress against student equity objectives is described in the annual reports (or equivalent) of my institution.						
In my institution's strategic plan (or equivalent), student equity objectives are linked to key performance indicators.						
Information about the performance of my institution against student equity objectives is publicly available.						

SECTION 3: STUDENT EQUITY OBJECTIVES ORIENTATION

7. To what extent do you agree or disagree with the following statement?						
	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	Not applicable
My institution's student equity objectives are designed to align with government student equity policy.						
My institution's student equity objectives are designed to align with the mission and values of my institution.						
My institution's student equity objectives are designed to align with the student cohorts my institution generally enrols.						

SECTION 4: STUDENT EQUITY OBJECTIVES RESOURCING

8. To what extent do you agree or disagree with the following statement?						
	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	Not applicable
Public funding that supports my institution's student equity objectives is adequate.						
Resources (financial and staff) allocated by my institution to support its student equity objectives are adequate.						
My institution's equity objectives, profile and performance makes it more attractive to prospective students.						

- 9. Please estimate the proportion (%) of institutional revenue that is associated with your institution's student equity objectives?
- 10. Please estimate the proportion (%) of institutional expenditure that is associated with your institution's student equity objectives?

SECTION 5: STUDENT EQUITY INDICATORS

11. To what extent do you agree or disagree with the following statement?						
	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	Not applicable
My institution uses input measures in support of student equity objectives (e.g. equity group enrolments).						
My institution uses output measures in support of student equity objectives (e.g. equity group graduations).						
My institution uses outcome measures in support of student equity objectives (e.g. impact of equity group participation).						
My institution uses process measures in support of student equity objectives (e.g. student experience and faculty diversity).						

SECTION 6: STUDENT EQUITY PERFORMANCE

12. To what extent do you agree or disagree with the following statement?			ı	I	ı	
	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	Not applicable
My institution is meeting its student equity objectives.						
My institution is improving its performance against student equity objectives.						
My institution is concerned with improving its performance relative to other institutions against student equity objectives.						
Expenditure allocated towards student equity objectives at my institution is effective and efficient.						

SECTION 7: STUDENT EQUITY CHANGE

- 13. Please provide <u>one</u> suggestion for how you would change how your institution approaches student equity.
- 14. Please provide <u>one</u> suggestion for how you would change how student equity is approached within public policy.

INTERVIEW SCHEDULE ETHICS REFERENCE NUMBER: E17-028

The project is funded by the National Centre for Student Equity in Higher Education through the Higher Education Participation and Partnerships Program of the Department of Education and Training of the Australian Government.

This research project is examining the interactions between student policy objectives and higher education performance and accountability systems. The research aims to identify opportunities to better integrate equity into performance and accountability systems.

Before we proceed with the interview I would like to confirm that you have read and understood the participant information statement and consent to proceed with the interview.

I note you have/have not consented to the interview being audio-recorded (mark as appropriate).

I need to advise you that I'll also be taking notes.

To kick things off, I'll give you a moment or two to complete this brief survey.

I'll refer back to your survey responses to inform this interview as appropriate, but will open up the questions by asking:

What are the student equity objectives?

- 1. What do you understand student equity objectives to be?
- 2. Are these student equity objectives equivalent across higher education, including social groups and attributes, institutions, disciplines or professions, and course levels?

Who determines the student equity objectives?

- 3. What role do you see for government in determining student equity objectives?
- 4. What role do you see for institutions in determining student equity objectives?
- 5. What role do you see for the higher education market as a factor in determining student equity objectives?

How are we tracking against student equity objectives?

- 6. How do you think the higher education system is performing against these student equity objectives?
- 7. Is performance against student equity objectives equivalent across the higher education system, including: social groups and attributes, institutions, disciplines or professions, and course levels?
- 8. What information do you draw upon to form these opinions?

Resource allocation against student equity objectives.

- 9. How do you think higher education financing aligns with student equity objectives?
- 10. What do you think would happen if financing for student equity objectives were to increase or decrease significantly?

Accountability for performance against student equity objectives.

- 11. How effective are the accountability systems in higher education for progressing student equity objectives?
- 12. Is accountability for progress against student equity objectives equivalent across the higher education system, including:
 - a. the Commonwealth Government and related systems (HESA) and agencies (TEQSA)

- b. state governments and related systems and agencies (annual reports, auditor generals)
- c. institutions and their systems and governance bodies (councils, academic boards, planning frameworks etc.)
- d. institutional networks and lobby groups (UA, Go8, IRU, ATN, RUN etc.)
- e. institutional staff, networks and culture (EPHEA, ATEND, HECQN).

IN-INTERVIEW SURVEY

To what extent do you agree or disagree with the following statement?	To what extent do you agree or disagree with the following statement?						
	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Not applicable	
Student equity objectives should be set at a national level by Commonwealth government and related agencies to address issues of national significance.							
Student equity objectives should be set by state government and related agencies to address issues of state significance.							
Student equity objectives should be set by individual institutions according to their mission and strategy.							
There is no need to specify student equity objectives.							
Public funding to support student equity objectives is adequate.							
Institutions allocation of staff and financial resources to support student equity objectives is adequate.							
Institutions that demonstrate good performance against their equity objectives are more attractive to prospective students.							
There is adequate transparency on progress against student equity objectives.							

Please estimate the proportion (%) of higher educated student equity objectives?	cation system financing that is associated with
Income:	Expenditure:

^{***}Note that these questions are indicative only and will not necessarily be asked or presented in this order. The interview will be structured more as a conversation between the Senior Stakeholder and interviewer, drawing together the concerns/interests of both in relation to equity performance and accountability in Australian higher education.

Appendix 2: Multiple Equity Group Data

Institution	oup 2015		Equity	
	All course levels	Postgraduate coursework	Bachelor	revenue as % of institutional revenue
The University of Notre Dame Australia	25.0%	24.6%	25.1%	0.1%
Bond University	31.0%	32.4%	31.3%	0.0%
Australian Catholic University	31.6%	30.3%	31.9%	1.0%
The University of Sydney	34.3%	29.5%	37.1%	0.2%
The Australian National University	35.1%	25.7%	41.0%	0.1%
Macquarie University	37.9%	31.9%	39.6%	0.5%
Non-Table A B Providers	39.6%	37.5%	38.8%	0.0%
Edith Cowan University	39.9%	35.1%	41.1%	1.2%
Queensland University of Technology	40.0%	42.1%	39.8%	0.7%
University of New South Wales	40.7%	37.3%	42.6%	0.3%
The University of Melbourne	40.7%	32.2%	51.0%	0.2%
Curtin University of Technology	40.8%	39.1%	40.9%	0.7%
University of Technology, Sydney	41.8%	39.1%	42.5%	0.6%
The University of Queensland	41.9%	37.8%	42.4%	0.4%
University of Divinity	42.0%	39.2%	31.5%	0.0%
Monash University	42.1%	38.1%	43.2%	0.3%
Griffith University	42.5%	39.2%	43.5%	0.9%
RMIT University	42.5%	37.6%	43.7%	0.5%
University of Canberra	42.5%	35.9%	43.8%	0.5%
The University of Adelaide	43.2%	41.9%	43.5%	0.4%
Victoria University	43.4%	39.2%	43.7%	1.2%
Swinburne University of Technology	44.4%	42.0%	45.2%	0.7%
Torrens University Australia	44.7%	44.4%	49.3%	0.0%
Western Sydney University	45.9%	39.2%	46.6%	1.8%
Flinders University	46.5%	44.4%	47.7%	0.9%
Deakin University	47.0%	43.2%	48.1%	0.8%
The University of Western Australia	47.2%	38.2%	49.8%	0.3%
The University of Newcastle	48.7%	48.8%	49.0%	1.4%
University of the Sunshine Coast	48.9%	42.9%	49.1%	1.1%
Murdoch University	49.9%	48.5%	50.4%	1.1%
University of South Australia	51.8%	45.6%	52.9%	1.3%
La Trobe University	53.6%	43.2%	55.6%	1.5%
University of Wollongong	55.5%	49.1%	56.6%	0.4%
Charles Sturt University	63.9%	53.5%	69.5%	3.6%
The University of New England	64.1%	54.7%	67.4%	3.4%
University of Southern Queensland	69.6%	60.6%	73.0%	3.2%
Southern Cross University	71.9%	58.9%	74.3%	4.0%
Charles Darwin University	73.3%	68.7%	73.4%	4.4%
CQ University	77.2%	74.1%	77.6%	2.6%
University of Tasmania	81.0%	75.3%	82.5%	2.7%
Federation University Australia	82.9%	70.5%	85.5%	2.3%
James Cook University	90.3%	65.8%	94.2%	4.3%
James Cook Oniversity	30.370	05.070	34.2/0	4.3/0

Notes:

- Any equity group refers to proportion of domestic students who belong to at least one of the designated equity groups.
- Equity groups.
 Equity revenue as % of institutional revenue refers to equity revenue (HEPPP, Regional Loading, Disability Support Program 2015, and Indigenous Support Program 2013) obtained from Department of Education and Training Determinations, divided by total institutional revenue obtained from Department of Education and Training Finance Reports