Australian Catholic University

Submission to the Australian Tertiary Education Commission (ATEC)

ATEC Statement of Strategic Priorities 2027-28 Consultation Paper

ATEC Workplan 2027 and 2028 – Summary Draft for Consultation

October 2026

Submission to the ATEC Consultation on a Draft Statement of Strategic Priorities and Workplan for 2027 and 2028

Australian Catholic University (ACU) appreciates the opportunity to provide feedback to the Australian Tertiary Education Commission (ATEC) on its consultation papers: *ATEC Statement of Strategic Priorities 2027-28 Consultation Paper* and *ATEC Workplan 2027 and 2028 – Summary Draft for Consultation.*

ACU looks forward to continuing to work constructively with ATEC as it establishes itself and advances its important stewardship role in the higher education system.

Broadly, ACU is supportive of the overarching priorities articulated in the draft Statement of Strategic Priorities for 2027 and 2028. These are important aspects of Australian universities' core functions and the priorities are well-aligned with ACU's strategic direction, as articulated in *Vision 2033*[1], and the University's mission and values[2].

ACU's fundamental concern, however, is on the practical application and operation of the SSP and its interrelationship with other elements in the higher education system; especially regulatory, reporting and accountability mechanisms. For instance, it is unclear how the SSP, mission-based compacts, the proposed performance framework, State of the Tertiary Education System (STES) reporting, and ATEC Workplan will operate collectively. ATEC's proposed stewardship model explicitly connects these elements, with the performance framework intended to contain system-level and provider-level indicators and metrics that will inform the STES reporting. The risk is that, in combination, these mechanisms could shift ATEC from system-level stewardship towards more detailed oversight and management of provider performance. The inclusion of international student profiles going forward also adds a further layer of complexity, which will require careful coordination to ensure alignment with overlapping mechanisms, reasonable and effective stewardship, and to avoid unintended consequences.

Without clarity on how these arrangements will interact and work overall, it is difficult to assess the proportionality and potential implications of individual components. The distinction between proportionate system stewardship and increasingly detailed provider-level oversight will ultimately lie in the design and application of these mechanisms, particularly the performance framework. As such, greater visibility of the interrelated elements and how they fit together is required to understand ATEC's stewardship, monitoring and reporting environment.

ATEC should remain vigilant to ensure there is no blurring of its stewardship role with the role and responsibilities of the Tertiary Education Quality and Standard Agency (TEQSA) as the sector's regulator.

There is also a question of timing and alignment. While acknowledging ATEC's establishing legislation requires the production of an SSP every two years, it is unclear how this would impact the negotiation and settlement of mission-based compacts and objectives with providers from 2027 which, appropriately, would cover a longer four-year timeline. Effective sector stewardship requires a longer-term vision and must afford providers adequate time to work to realise strategic priorities. Therefore, ACU urges ATEC to exercise the latitude it is afforded to provide greater certainty for the sector by affirming consistent priorities (with a stable performance framework) and/or mapping their future direction at the outset of these negotiations.

ACU encourages ATEC to provide further opportunity for sector consultation once all elements, holistically, have been further developed and drafted, and before the overarching framework is finalised. It is essential that strategic ambition, provider autonomy, system capacity and accountability are integrated within one coherent stewardship framework.

ACU provides the following feedback in response to the consultation questions.

[1] Australian Catholic University. *Vision 2033*. https://vision2033.acu.edu.au/
[2] Australian Catholic University. *Our Mission*. https://www.acu.edu.au/about-acu/mission-identity-and-values/our-mission

I. Feedback on *ATEC Statement of Strategic Priorities 2027-28 Consultation Paper*

1. Do the draft outcomes meaningfully reflect progress towards the National Tertiary Education Objective and ATEC's legislated goals? Would achieving these outcomes demonstrate a high quality and sustainable tertiary education system?

ACU considers the draft outcomes provide an appropriate basis for examining progress towards the National Tertiary Education Objective and ATEC's legislated goals. ACU supports an outcomes-based approach, provided the eventual performance framework preserves institutional differentiation and recognises that providers will contribute to sector-wide outcomes in different ways according to their missions, student cohorts, local environments and operating contexts.

ACU identifies the following as areas for attention and to further refine and strengthen the SSP.

The SSP's recognition of different provider missions and contexts should carry through to compact targets and reporting. With respect to "Equitable access, participation and success", ACU would suggest clarifying the wording around completion of studies in "minimum time" (SSP Consultation Paper, p. 8) to ensure this accommodates part-time study, students with disability, and students with caring responsibilities.

ACU seeks clarification on how the priorities and outcomes would be applied and assessed against any performance framework with respect to universities, such as ACU, that are operating in multiple Australian jurisdictions and are consequently catering to a diverse and different range of local contexts. Evidently the Interim SSP was accompanied by articulated state and territory priorities, which is not found in the current draft SSP. Furthermore, ATEC proposes retaining "National, state/territory and regional priorities" in the new SSP. Notably, ACU is a national university with seven campuses in three states (New South Wales, Victoria, and Queensland) and one territory, including one campus in regional Australia (Ballarat, Victoria). Place-based solutions could receive greater emphasis in this context, particularly in relation to regional, outer-metropolitan and underserved communities. For example, workforce shortages in education, health, aged care and community services often require locally tailored strategies supported by mission-based institutions with strong community partnerships.

The 'Graduate Capability and National Benefit' outcome appropriately recognises the importance of the humanities, social sciences and arts. This acknowledgement should be retained and strengthened. While workforce responsiveness is critical, tertiary education also contributes to civic participation, ethical reasoning, social cohesion, leadership and democratic resilience. These capabilities are increasingly important in an era characterised by technological disruption, artificial intelligence, misinformation and social polarisation. More broadly, greater recognition of providers' civic, ethical and social contributions would more comprehensively reflect the broader public purposes of tertiary education.

The 'Research and Knowledge for Public Benefit' outcome could place greater emphasis on the role of humanities, social sciences, theology and ethics in addressing complex societal challenges. National challenges such as AI governance, social cohesion, climate adaptation, community resilience, health equity and intercultural understanding require interdisciplinary solutions that extend beyond technological innovation alone.

With respect to the outcome 'System Quality, Diversity and Resilience', although sustainability is explicitly mentioned, its practical application is less visible in the strategic priorities through which the outcome would be delivered. ACU does not propose an additional priority in this regard, rather, there could be clearer articulation of how system sustainability, diversity and resilience will be operationalised and what this means for individual providers and the sector. Given ATEC's functions in relation to the strategic direction, size and diversity of the tertiary education system and the financial sustainability of providers, ACU considers that the respective roles of ATEC and TEQSA should be more clearly delineated. This outcome should also explicitly recognise institutional diversity as a strategic strength. For instance, ACU as a mission-based university makes distinctive contributions to Australia's higher education ecosystem including through its focus on community engagement, social justice, faith-informed scholarship, regional participation and the preparation of graduates for caring professions. Maintaining such diversity in institutional missions is essential to a resilient system.

In the graduate capability and equitable participation outcomes, international and intercultural capability should be recognised. Graduates increasingly work across cultural and national contexts, including within Australian health, education and community settings. The framework could also recognise equitable access to international learning. Short-duration mobility, virtual collaboration and internationalisation of the curriculum can extend participation to students whose financial circumstances, disability, caring responsibilities or location constrain overseas study.

2. Do the draft priorities appropriately reflect the key areas that ATEC should focus on throughout 2027 and 2028? Are there any key focus areas within ATEC's remit that should be added, consolidated, refined or removed, and why?

ACU broadly supports the proposed priorities and the direction of their development, however, recommends the final SSP distinguish more clearly between substantive strategic priorities and cross-cutting guiding principles or enablers. For instance, Collaboration could be treated as a cross-cutting enabler rather than a standalone strategic priority. ATEC identifies collaboration as supporting participation, attainment, learning and teaching quality, research impact and community outcomes, while employer partnerships support work-integrated learning, curriculum relevance, workforce development and the translation of research into practical and applied outcomes. Provider, industry and community partnerships should therefore be embedded within the priorities to which they directly contribute, reinforcing collaboration as an important mechanism for delivery while reducing potential duplication across the SSP and mission-based compacts.

ACU suggests that any addition of further priority areas should be carefully managed to avoid creating excessive reporting or compliance burdens for providers.

ACU recommends the following to enhance the SSP and ATEC's approach:

With respect to Equity, while the SSP recognises flexible pathways under this priority, the contribution of school-based, enabling and Foundation programs could be made more explicit alongside a focus on VET–higher education connections.

The SSP could also better cover institutional change and recognise institutional effort. The SSP recognises systemic barriers but could more clearly emphasise the need for institutional system change to address them. This includes embedding equity in policies, processes and practices across admissions, enrolment, curriculum, assessment and placements etc, with shared responsibility across academic and professional areas. Any provisions around accountability should also recognise both student outcomes and the work universities are undertaking to address systemic barriers, acknowledging that improvements in access, participation and success take time.

ACU welcomes the explicit recognition of global engagement as a strategic priority. International education, research collaboration, reciprocal partnerships and mobility contribute to Australia's educational capability, prosperity and international relationships. A sustainable international education sector requires predictable policy settings and sufficient planning horizons. Universities make multi-year commitments to students, staff, and partners. ATEC's stewardship should support coordinated advice across government on the cumulative effects of policy changes on educational continuity, institutional sustainability and Australia's international reputation. There should, however, be recognition of the distinction between international student recruitment and broader global engagement. Transnational education, offshore partnerships, research collaboration and mobility contribute to national priorities but should not inadvertently become subject to enrolment controls designed for onshore international education.

ATEC should also take account of Australia's international trade and education cooperation commitments, including the Regional Comprehensive Economic Partnership (RCEP) and relevant bilateral arrangements. Greater alignment across education, migration and trade policy would help universities realise existing opportunities for international collaboration and diversification, while respecting institutional autonomy and the responsibilities of existing agencies. The framework should recognise the benefits of diversification while preserving universities' flexibility to develop international partnerships and activities consistent with their missions and existing regulatory obligations. Notably,

diversification takes time and investment and should not be assumed to offset reductions in onshore international education income in the short term. Furthermore, any performance expectations should recognise differences in discipline mix, institutional scale, campus footprint(s), and partnership models. Measures should focus on demonstrable educational and public benefit, student outcomes and sustainability, rather than relying primarily on enrolment volume or rankings. In any assessments, ATEC should use existing data and reporting wherever possible, consult providers before introducing new indicators, and distinguish institutional performance from external factors beyond a provider's control.

With respect to research and research training, international collaboration is fundamental to Australia's research capability. International higher degree by research (HDR) candidates, joint supervision, institutional networks and access to overseas expertise, infrastructure and funding strengthen the national research system. ATEC's approach should complement existing research agencies, preserve institutional responsibility for research strategy, and recognise disciplinary diversity. Measures of national benefit should encompass contributions to health, education, social wellbeing, culture and public policy alongside commercial and technological outcomes.

There is also scope to strengthen the recognition of civic and social outcomes in the SSP. While the current framework understandably focuses on workforce needs, the National Tertiary Education Objective also emphasises democracy, social development and community wellbeing. Therefore, ATEC should ensure any new performance framework recognises these broader societal contributions of tertiary education including civic engagement, community partnerships, ethical leadership and social cohesion. The humanities, philosophy, theology and social sciences make important contributions in these areas.

ATEC could also consider better capturing digital transformation, artificial intelligence (AI) capability, and ethical innovation in the SSP. While AI is referenced within teaching and research priorities, its transformative impact extends across learning, research, professional practice, workforce capability and governance. ATEC should consider elevating AI and digital transformation as a cross-cutting strategic priority. This priority should not focus solely on technological capability but also on ethical, social and human-centred dimensions of AI adoption. Australia's future workforce will require graduates capable of critical thinking, ethical reasoning and using AI responsibly in professional settings.

Finally, while acknowledging that lifelong learning and workforce reskilling are referenced in the SSP, they could be better captured in the SSP. The pace of economic and technological change will require ongoing upskilling and reskilling, including through microcredentials, professional learning and stackable qualifications.

3. Reflecting on the interim SSP and foundation mission based compact process, are the proposed priorities practical and useful in enabling providers to reflect their unique missions and operating contexts?

The consultation paper provides for a two-year cycle for the SSP and a four-year duration for mission-based compacts. ACU affirms the need for long-term planning and funding certainty, which is better supported through a four-year Compact, however the misalignment between these cycles creates uncertainty for providers. As proposed, a provider would enter a compact under one SSP but conclude it under a different set of strategic priorities. This creates the potential for expectations and measures of performance to shift significantly during an agreed compact period. ATEC should clarify how a change in the SSP during a compact period would affect existing commitments, performance measures and Domestic Student Profiles. In particular, changes to the SSP should not automatically result in material revisions to an agreed compact or generate additional provider-level reporting requirements.

Greater alignment between the SSP cycle and the duration of compacts, or alternatively, explicit transitional arrangements protecting existing commitments from material mid-cycle changes, would provide greater strategic and operational certainty while retaining sufficient flexibility for ATEC to respond to significant changes in government or national circumstances.

System-level modelling of the enrolment trajectory required to achieve the Australian Government's target of a 80% tertiary education attainment rate for working-age Australians by 2050, with intermediate projections to 2031 and across subsequent compact periods, would also provide a valuable evidence base for future planning. This analysis could translate the national attainment objective into indicative demand and capacity requirements, providing greater insight into skills and workforce needs across states and territories, and identifying opportunities for providers to increase enrolments in areas that support national priorities.

It could also make the longer-term objective of system sustainability, diversity and resilience more tangible by providing a clearer line of sight between the national attainment ambition, the scale and distribution of growth required, and the Domestic Student Profiles negotiated through individual compacts.

More broadly, the shift towards outcomes-oriented priorities would appear to allow universities to demonstrate their progress towards the priorities in ways that align with their individual missions, strategic strengths and community needs. For ACU, the framework accommodates the University's distinctive mission and contributions through, for example:

- a commitment to widening participation and supporting underrepresented students;
- leadership in teacher education, healthcare and community service professions;
- strong engagement with regional and outer-metropolitan communities;
- research addressing social, ethical and community challenges; and
- the formation of graduates who contribute to the common good through ethical leadership and service.

As a guiding principle, ACU submits that the SSP and ATEC's approach to stewardship will be most effective where the focus is on shared outcomes rather than prescribing uniform approaches. Mission-based compacts should continue to recognise institutional diversity and avoid performance measures that favour particular provider types or disciplinary mixes. ATEC should also ensure that performance indicators capture qualitative and mission-related contributions, including community impact, social outcomes, student belonging, cultural engagement and civic contribution, alongside quantitative measures of growth, participation and workforce alignment.

II. Feedback on *ATEC Workplan 2027 and 2028 – Summary draft for consultation*

Fundamentally, ATEC should prioritise strategic work that addresses current and emerging structural challenges rather than duplicating activities undertaken by existing agencies.

ACU notes the Workplan reflects the work being undertaken to engage on matters of pricing of higher education courses and appropriate Commonwealth Grant Scheme funding amounts. ACU reiterates the imperative - as recommended by the Australian Universities Accord and urged by the sector and students - to replace the Job-ready Graduates Package reforms. This requires urgent attention in consultation with the sector.

With respect to the negotiation of mission-based compacts with universities, as reflected in the Workplan, ACU seeks clarification of the purpose, scope and consequences of international student profiles within mission-based compacts. In particular:

- whether profiles are planning instruments, performance commitments or inputs into allocation decisions;
- how they interact with other government mechanisms affecting international enrolments;
- the definitions and boundaries of international student profiles, including how they relate to existing reporting and enrolment settings, without extending compact oversight to universities' offshore partnerships and delivery models;
- how institutional mission, discipline mix, campus circumstances and diversification objectives will be recognised; and
- how profiles will be reviewed when material policy, visa-processing or geopolitical changes affect the assumptions on which they were negotiated.

The process should preserve institutional autonomy within applicable government settings and avoid creating a parallel or inconsistent mechanism for managing international enrolments. Any agreed expectations with providers should be transparent, evidence-based and capable of adjustment where circumstances materially change.

ACU also seeks clarification on how the global engagement priority will inform ATEC's existing compact, evidence and advisory functions. The immediate priorities should be to provide clarity on international profiles, consult providers on relevant performance measures, and ensure coordinated consideration of policy impacts. This work should complement the responsibilities of education, migration, trade and regulatory agencies, with clear boundaries and no unnecessary duplication of provider reporting.

ATEC's Workplan for 2027 and 2028 could also include a focused assessment of international engagement's contribution to system sustainability and national benefit. The assessment should examine how government policy settings affect international education's contribution to national benefit, student progression and institutional planning. It should draw on existing evidence and identify opportunities for greater coherence across education, migration and trade policy, without creating additional provider reporting requirements.

More broadly, future ATEC work (acknowledging the short two-year duration of the current work plan) could include an examination of AI, digital transformation and graduate capabilities. This could entail analysing the workforce implications of generative AI, looking at assessment reform, digital literacy and assurance of learning outcomes, and identifying the capabilities required for graduates in increasingly AI-enabled workplaces. Human capability and civic outcomes are also areas ATEC could delve into. This could involve research into the contribution of higher education to social cohesion, democratic participation, ethical leadership and community wellbeing, and consideration of how these outcomes might be recognised within stewardship and performance frameworks. Workforce planning in human services professions is another area for greater attention, and ATEC could seek to develop more integrated modelling of future workforce needs in teaching, nursing, allied health, aged care, mental health and community services, including regional workforce needs to support planning and delivery on SSP objectives.

As proposed, the planned Outreach program and needs-based funding (NBF) reviews and implementation of the National Credit Recognition Framework is necessary. The reviews could examine progression from outreach and preparation into degrees, including the resources needed for transition support. Further analysis from late 2027 could assess which pathway models improve retention and completion. The NBF and Outreach reviews should be closely coordinated to identify gaps in the continuum of work across outreach, access and participation.

To support implementation and evidence-based practice in the context of equity objectives, as an additional project from late 2027, ATEC could examine what helps universities put existing equity evidence into practice and what prevents this from happening. This could identify effective approaches to institutional change and the leadership, staff capability and resources needed to enact and sustain them.

Other areas ATEC could add value in the future, by acting as a trusted system steward and knowledge broker in the tertiary education system, include:

- The development of nationally consistent data, benchmarking and forecasting capabilities for the higher education sector.
- Facilitating the dissemination of good practice in student success, equity and teaching innovation, and evidence-based guidance on AI, student success, workforce alignment and institutional sustainability.
- Supporting collaboration between universities, TAFEs, industry, communities and government.
- Providing horizon scanning and long-term strategic analysis on emerging trends.