Universities Australia's response to the Australian Tertiary Education Commission's Statement of Strategic Priorities and Workplan 2027-28

The Statement of Strategic Priorities 2027-28 (SSP) and Workplan 2027-28 (Workplan) represent significant milestones following the passage of legislation to establish the Australian Tertiary Education Commission (ATEC). UA appreciates ATEC's commitment to genuine consultation and welcomes the opportunity to shape priorities and activities that reflect the ambitions of universities to deliver transformative education, innovative research and contribute to Australia's economic and social prosperity.

Universities support an effective and capable ATEC. UA has successfully advocated on behalf of its members for a strong and independent ATEC with the authority and capability to provide effective system stewardship, including through amendments to the *Universities Accord (Australian Tertiary Education Commission) Bill 2026* and the *Universities Accord (Opening the Doors of Opportunity) Bill 2026*.

UA has consistently pointed to an important distinction between stewardship and control. ATEC should not seek to regulate higher education, and instead support universities to deliver on local, regional and national priorities. The SSP and Workplan should ensure that the principle of stewardship is central to ATEC's activities, consistent with the Australian Universities Accord (the Accord) and the objects of the *Universities Accord (Australian Tertiary Education Commission) Act 2026* (ATEC Act).

UA broadly supports the direction of the SSP and Workplan, particularly their focus on improving educational attainment, equity, graduate outcomes and system quality. Together, these documents provide an important opportunity to establish a coherent framework for ATEC's stewardship of Australia's higher education system.

The SSP should establish focused and achievable strategic priorities that recognise the contribution of universities to Australia's national ambitions. Additional priorities and performance metrics place substantial burden on universities, diverting focus away from where they are needed most.

The Workplan should translate focused priorities into practical, coordinated activities that address the challenges facing the sector and strengthen its capacity to deliver.

UA's recommendations focus on strengthening the alignment between these documents, ensuring that strategic ambitions are supported by the funding, policy settings and institutional flexibility necessary to achieve them.

This submission should be read in conjunction with the Universities Australia Deputy Vice-Chancellors Indigenous (DVCI) Committee who hold deep expertise in First Nations self-determination and success.

Our response is guided by four overarching principles, followed by specific recommendations for refining the SSP and Workplan.

Guiding principles

UA supports a strategic framework that is ambitious about what universities can deliver for Australia while recognising the conditions necessary for their success.

1. Ambition must be matched by financial sustainability and system capacity. ATEC's strategic priorities must recognise that universities need sustainable funding and appropriate policy settings to deliver quality education, innovative research and the ambitions of the Accord.
2. Stewardship must support institutional autonomy and diversity. ATEC should focus on strengthening system performance and capability, rather than introducing additional layers of oversight. Its responsibilities should be clearly distinguished from those of government departments and regulators, with mission-based compacts recognising the distinct missions and circumstances of individual universities.
3. National priorities must connect with state, territory and regional needs. Effective stewardship requires close collaboration with state and territory governments, universities and other stakeholders to ensure national reforms respond to different demographic, workforce and economic circumstances.
4. Strategic priorities must be focused, coherent and supported by practical action. The SSP should establish a manageable set of outcomes-oriented priorities, avoiding duplication and unnecessary reporting obligations. The Workplan should demonstrate how ATEC will advance these priorities through clearly defined, coordinated activities that deliver tangible benefits for the sector and the communities it serves.

Summary of recommendations

UA recommends the following refinements to the SSP and Workplan to strengthen their alignment, support effective system stewardship and ensure ATEC's strategic priorities translate into practical outcomes.

Strengthen the Statement of Strategic Priorities

UA supports the SSP's overarching system-level outcomes and its focus on First Nations success, equity, graduate capability and system quality. We recommend targeted refinements to ensure the priorities are appropriately focused, reflect the conditions necessary for success and remain consistent with ATEC's stewardship role.

Recommendation 1 – Recognise financial sustainability as an enabling priority. Explicitly recognise higher education funding and financial sustainability as fundamental to system capability, capacity and delivery of the Accord's ambitions.

Recommendation 2 – Align national, state, territory and regional priorities. Ensure national strategic priorities acknowledge jurisdictional differences, local workforce and community needs, and the distinct contributions of universities.

Recommendation 3 – Clarify ATEC's stewardship responsibilities. Establish clearer boundaries between ATEC's stewardship role and the responsibilities of government departments and regulators, including

in relation to research, regulation and mission-based compacts. Ensure that strategic priorities support institutional autonomy, diversity and collaboration rather than creating additional compliance requirements.

Recommendation 4 – Streamline the proposed additional priorities. Maintain a focused and coherent strategic framework by:

- Global engagement: Align with the forthcoming International Education and Skills Strategic Framework and ATEC's role in stewarding international education and research.
- Collaboration: Embedding lawful and responsible collaboration, including across universities, TAFEs and industry, within a joined-up tertiary system rather than establishing a separate priority.
- Student experience and safety: Incorporate student experience, engagement and success in existing priorities, avoiding duplication with existing regulatory responsibilities.

Align the Workplan with ATEC's strategic ambitions

The Workplan should provide a clear pathway for delivering the SSP's system-level outcomes. UA recommends strengthening the proposed program of activities in several areas where targeted action would improve system performance and better support universities.

Recommendation 5 – Prioritise higher education funding reform. Explicitly commit to reviewing Job-ready Graduates cluster funding arrangements by Q3 2027, including the implications for student contributions, as part of ATEC's advice on efficient, evidence-based course funding.

Recommendation 6 – Strengthen the work program on graduate capability and national benefit. Expand practical activities supporting graduate capability, including AI preparedness, work-integrated learning and lifelong learning, informed by consultation with universities, industry, Jobs and Skills Australia and state and territory governments.

Recommendation 7 – Support a joined-up tertiary education system. Work closely with universities, TAFEs and state and territory governments on the design and implementation of the National Credit Recognition Framework, ensuring that arrangements are flexible, protect academic standards and institutional autonomy, and improve student pathways.

Recommendation 8 – Establish practical arrangements for effective stewardship. Ensure the Workplan supports:

- Collaborative, evidence-based mission-based compact negotiations that reflect institutional diversity and autonomy.
- Clear coordination with relevant departments and regulators to reduce duplication and unnecessary regulatory burden, including early consultation on significant regulatory changes.
- A clearly defined research stewardship role, supported by appropriate ATEC expertise and coordinated with existing government responsibilities.

Recommendation 9 – Strengthen activities supporting equity, participation and student success. Work closely with universities and relevant stakeholders to:

- Implement needs-based funding arrangements consistent with their intended policy objectives.
- Review outreach funding arrangements in ways that protect established partnerships and effective participation pathways, particularly in regional and remote communities.
- Progress disability inclusion reforms, including through the National Disability Strategy for Higher Education and continued support for the Australian Disability Clearinghouse for Education and Training.
- Ensure initiatives relating to teaching quality are developed through meaningful consultation and sector engagement.

The following sections provide supporting analysis for UA's recommendations, addressing the proposed strategic direction in the SSP before responding to the activities and implementation priorities in the Workplan.

Response to the Statement of Strategic Priorities 2027-28

Supporting higher education to deliver for Australia

Financial sustainability is essential for quality teaching and learning, addressing skills shortages and delivering innovative research. Many universities are managing significant financial pressures, including the effects of recent government policy changes affecting international students, migration and funding for Commonwealth-supported places. These pressures directly influence the sector's capacity to deliver the ambitions of the Accord and the ATEC Act and should be recognised by ATEC in its stewardship role.

A clear example of the impacts of inadequate funding is the JRG package, now in its sixth year with indications that it will continue until at least 2028. An estimated annual university funding shortfall of $800 million undermines the sustainability of universities, while the package's student contribution arrangements disproportionately affect some students and leave many graduates with larger debts at a time of significant cost-of-living pressures.

Amendments to the SSP

The SSP should be amended to include higher education funding and financial sustainability as an explicit enabling priority, recognising the financial realities that universities face and ATEC's central role in funding decisions. While the SSP is not intended to determine individual funding settings, recognising the relationship between financial sustainability and system performance is consistent with the objects of the ATEC Act, particularly its focus on system capability and capacity.

Positioning higher education funding and financial sustainability as an enabling priority would allow universities to reflect on areas of activity affected by structural funding pressures through the mission-based compact process. While funding intersects with other priorities, it is a necessary and distinct component of a strong higher education system and should be explicitly recognised in the SSP. Unlike a discrete policy priority, financial sustainability is an enabling condition that underpins delivery across all four system-level outcomes. Its inclusion would strengthen the existing framework rather than unnecessarily expand it.

The SSP focuses on First Nations self-determination and success, equitable access, participation and success, graduate capability and national benefit, and system quality, diversity and resilience. Yet these ambitions cannot be considered separately from the funding settings that shape universities' ability to deliver them. A credible stewardship framework must recognise and respond to this relationship.

State and territory priorities

Place must be a core organising principle of the new tertiary education system. The Accord cannot achieve its objectives through a nationally uniform approach to growth. Australia's states, territories and regions face markedly different demographic, workforce and economic circumstances. Universities are highly connected and responsive to localised needs, working with communities to address challenges and codesign solutions. State and territory governments are essential partners to the Commonwealth in responding to those needs, building on the strong relationships between their universities and communities.

The ATEC Act recognises the importance of coordination and collaboration with states and territories, while the SSP requires consultation with state and territory ministers responsible for higher education. Engagement with states and territories provides valuable insights into localised priorities including teaching and learning needs, regional workforce shortages and research ambitions.

Amendments to the SSP

The SSP should reflect ATEC's legislated responsibilities and its engagement with state and territory governments by aligning with state and territory priorities and local needs. This would strengthen the connection between national stewardship and jurisdictional priorities, while supporting universities as anchor institutions in their communities, recognising their distinct missions and contributions to regional economic development, workforce capability and community wellbeing.

The SSP should make clear that national outcomes will be achieved through differentiated institutional contributions, rather than uniform expectations across the sector. This includes recognising graduate outcomes of both undergraduate and postgraduate cohorts in performance metrics where relevant for particular qualifications, institutions and regions.

Strengthening ATEC's stewardship role

UA has consistently supported the establishment of an independent ATEC with the authority, expertise and capability to provide effective long-term stewardship of Australia's higher education system. As ATEC transitions into its ongoing statutory role, it is important to establish a clear understanding of the boundaries between system stewardship, government policy, funding, regulation and institutional autonomy.

ATEC's activities must be informed by its legislated stewardship responsibilities. Its role should be to strengthen the capability and capacity of the higher education system, rather than introduce additional layers of oversight that constrain university autonomy and diminish its ability to deliver the ambitions of the Accord.

The SSP should give practical effect to this distinction, establishing clear responsibilities for ATEC and ensuring its activities complement, rather than duplicate, those of other government agencies and regulators.

ATEC has an important role in limiting regulatory overreach, through its own activities and those of other government agencies. The SSP should reflect that system quality, diversity and resilience rely on reducing duplication, strengthening regulatory coordination and freeing universities to focus resources on teaching, research and student support.

UA has advocated for practical stewardship principles including:

- ask once – use many times
- one government – one definition
- replace before adding
- coordinate regulation around universities, not agencies, and
- make regulatory stewardship an ongoing responsibility.

These principles should be reflected in the SSP, with explicit reference to the relationship between efficient regulation and a high-performing tertiary education system.

Amendments to the SSP

The SSP should provide clearer guidance on how ATEC will exercise its stewardship responsibilities while respecting the roles of existing regulators and the autonomy of universities. It should:

- Ensure that the priorities provide guidance about challenges and opportunities in higher education, without becoming quasi-regulatory requirements that constrain institutional autonomy or innovation.
- Clarify relationships with the Department of Education and the Tertiary Education Quality and Standards Agency (TEQSA), including distinctions between regulatory and stewardship responsibilities.
- Clarify responsibilities for research stewardship, including potential duplication with the Department of Education and other agencies, and ensuring that ATEC has the appropriate expertise to effectively steward research as a strategic priority.

Ensure that mission-based compact negotiations guided by the SSP are collaborative and constructive, allowing for genuine evidence-based negotiation that reflects the distinct missions and circumstances of individual universities. UA could play a valuable role in coordinating sector feedback and working with ATEC to streamline and enhance the mission-based compact process for 2028-2031.

Ensuring priorities and activities are focused and outcomes-driven

UA has consistently advocated for a focused and outcomes-driven set of ATEC priorities and activities. Through mission-based compacts, universities are required to reflect on priorities through performance domains. Every additional priority has the potential to create additional reporting obligations for universities and should be critically examined for overlap and suitability. ATEC should

maintain a focus on a common core of priorities and avoid unnecessary expansion without clear rationale or demonstrated benefit.

Amendments to the SSP

The SSP should provide sufficient stability for long-term university planning while allowing priorities to evolve in response to emerging national needs. Any additions should demonstrate their distinct contribution to the system-level outcomes and avoid unnecessary overlap with existing priorities.

UA provides the following feedback on the three additional priorities proposed in the consultation paper.

Global engagement

Universities recognise the importance of international education and research. Our engagement with the world through higher education is a critical national asset and a major Australian export, supporting university teaching and research and jobs and communities across the country. Through global engagement, we strengthen Australia's relationships and standing around the world.

However, recognising global engagement as a strategic priority must be matched by policy settings that enable universities to deliver against it. Recent restrictions and policy uncertainty affecting international education and research collaboration risk undermining the contribution universities can make to Australia's economic prosperity, research capability and international relationships.

ATEC must ensure that global engagement is framed as an enabling, outcomes-oriented strategic priority aligned with the forthcoming International Education and Skills Strategic Framework and advocate for this vitally important sector. This includes providing evidence-based advice to government on international education and research policy settings, including international student allocation arrangements that recognise universities' differing missions and circumstances and are informed by demonstrated performance through mission-based compacts.

Collaboration

UA emphasises the value of collaboration across universities, industry and communities, but questions the need for a separate collaboration priority in the SSP. There is substantial overlap with other priorities due to the general framing of partnerships without clear guidance on where collaborative activities should be reflected. For example, a niche subject area taught collaboratively across institutions could be equally relevant under national, state/territory and regional priorities.

We note that practical pathways for lawful collaboration, without breaching the provisions of competition law, was a specific recommendation of UA's submission to the inquiry into the *Universities Accord (Opening the Doors of Opportunity) Bill 2026*. While we welcome ATEC recognising this feedback, we recommend that collaboration be incorporated into the supporting text of the joined-up tertiary system priority rather than established as a standalone priority. This would recognise collaboration as an important enabler of tertiary system outcomes while avoiding duplication and maintaining a more focused strategic framework.

ATEC should also ensure that collaboration remains a recognised contribution to system outcomes, including through its relationship to national, state/territory and regional priorities, quality teaching and research. Universities should be able to reflect on collaborative activities through mission-based compacts, particularly as it links to innovation.

Student experience and safety

UA supports the ambition to ensure all students have access to safe, inclusive and supportive learning environments. We also acknowledge the important work of the Higher Education Gender-based Violence Regulator (GBV Regulator) and National Student Ombudsman (NSO) to improve student experience and safety at university. However, we have concerns about the inclusion of this priority, particularly given the significant regulatory coverage of these issues through the Department of Education (including the GBV Regulator), TEQSA and the NSO.

ATEC should review whether expected responses to this priority through mission-based compacts will overlap with reporting to other government agencies to ensure that information is not unnecessarily duplicated.

The proposed priority should be incorporated within existing priorities relating to attainment, equity and quality teaching, reframed around positive student experience, engagement, wellbeing and success, consistent with the outcomes-oriented approach of the broader SSP. This would recognise the importance of safe and supportive learning environments while placing greater emphasis on the conditions that enable students to participate, progress and succeed.

Response to the Workplan 2027-28

Supporting higher education to deliver for Australia

Addressing Job-ready Graduates

University students and staff, ATEC representatives, and the Minister have universally criticised JRG as not fit for purpose. It is crucial that the Workplan reflect this shared priority for our sector, acknowledging that its removal would significantly improve system-level outcomes including First Nations success, equitable access, graduate capability and national benefit and system quality, diversity and resilience.

The Workplan references providing the Minister advice on efficient, evidence-based prices for higher education courses. This necessarily involves a review of the JRG cluster funding arrangements. The Workplan should explicitly include this review by Q3, 2027, to ensure that any advice to the Minister includes relevant implications for student contributions. This should be identified as a specific deliverable, recognising that reform of course funding and student contributions is central to improving financial sustainability, equity and system performance.

State and territory priorities

Graduate capability

ATEC should strengthen its program of work in relation to graduates to better support Australia's capability and workforce needs. The Workplan identifies few projects directly related to graduate capability despite opportunities to effectively steward AI preparedness, work-integrated learning and lifelong learning.

The Workplan should identify practical activities to advance these areas, drawing on the expertise of universities and engagement with industry, Jobs and Skills Australia and state and territory governments. This would more clearly translate the SSP's graduate capability and national benefit outcome into an identifiable program of work. Engagement with states and territories should also inform how localised emerging workforce needs are identified and responded to through coordinated action.

Consideration should also be given to how ATEC fosters graduate capability as a public benefit beyond workforce requirements. The Accord frames key reforms and outcomes around student perspectives and aspirations for post-school education. University can be a transformational experience, particularly for students from disadvantaged backgrounds, with broad flow-on effects for Australian economy and society. ATEC should consider how students inform its priorities and workplan, acknowledging the stake they hold in national objectives.

Tertiary harmonisation and credit recognition

The Tertiary Roadmap and National Credit Recognition Framework (NCRF) are anticipated within the next two months. Consistent with UA's response to the tertiary system discussion paper, ATEC should prioritise consulting with universities, particularly on the NCRF which has been indicated to commence in 2027. Consultation should extend to TAFEs and state and territory governments, with sufficient opportunity to resolve implementation challenges before new arrangements commence.

Credit recognition arrangements should remain sufficiently flexible to account for differences between providers, disciplines and qualifications, while protecting academic standards, course integrity and institutional autonomy. A joined-up system should focus not only on establishing a national framework, but on ensuring students have clearer information about pathways and that providers are appropriately supported to implement credit recognition effectively in practice.

Strengthening ATEC's stewardship role

Research stewardship

While UA acknowledges ATEC's inclusion of research as a key system-level outcome and priority, the Workplan currently includes substantially less activity related to research, reflecting an initial focus on CSP allocations and mission-based compact processes. ATEC should identify how it will exercise its research stewardship responsibilities, complementing existing government activities and avoiding additional regulatory burden. This would necessarily require ATEC to build internal research capability, ensuring that its role is well defined and aligned with broader government policy.

Universities would benefit from ATEC championing the role of research in Australia's universities. This could include working to support critical challenges such as fundamental research, research workforce, infrastructure, funding, translation, international collaboration and industry engagement. Acknowledging and accommodating the interdependency of the research ecosystem with broader financial challenges, including restrictions on international education, would also support the sector to deliver on ATEC priorities.

Better regulation

More broadly, ATEC should use its Workplan to demonstrate how it will contribute to regulatory coordination and simplification, including through early consultation on significant regulatory changes and working with relevant agencies to minimise duplication. This would give practical effect to the stewardship principles outlined in the SSP.

Ensuring priorities and activities are focused and outcomes-driven

Equitable access, participation and success

The Workplan's activities relating to equity, participation and student success are important mechanisms for delivering the SSP's system-level outcomes. UA supports this direction and

recommends several refinements to ensure implementation is practical, evidence-based and informed by universities and the communities they serve.

The Workplan appropriately focuses on the implementation of needs-based funding, particularly demand-driven equity and equity definitions. This reflects UA positions on the Universities Accord (Opening the Doors of Opportunity) Bill 2026 which were made during the parliamentary process. We recommend that ATEC engage closely with UA and its members on needs-based funding implementation to ensure that the details reflect stated policy intent.

Any review of the Outreach Funding Program should consider the important role that outreach activities play in providing pathways for equity cohorts and boosting participation in line with the Australian Universities Accord (Accord). The separation of outreach activities into a specific funding stream through recent policy creates significant challenges for universities with established programs and partnerships, particularly in regional and remote communities where they have the greatest impact.

The Workplan should ensure that any review considers the continuity and effectiveness of established outreach programs, including the implications of recent funding changes for long-term partnerships and participation outcomes.

Improving participation and success for people with disability is a shared priority across the higher education sector. UA acknowledges ATEC's continuing work in progressing disability reforms, and the establishment of a Disability Inclusion Advisory Committee. The forthcoming National Disability Strategy for Higher Education should draw on this committee, and those with lived experience across Australia's universities, to build a stronger evidence base and ensure that the Accord target of increased participation for students with disability is met. ATEC should also ensure its work is aligned with the Department of Education, who currently administer the Disability Support Program. Continued support and investment in the cross sectoral Australian Disability Clearinghouse for Education and Training (ADCET) is required as an urgent priority.

Teaching quality

UA supports efforts to strengthen teaching quality but recommends that the Workplan provide sufficient opportunity for meaningful consultation and co-design with university stakeholders before advice is finalised. This should include careful consideration of Professor Emerita Liz Johnson's recommendations in Enhancing professional practice in Australian higher education teaching, ensuring that proposed approaches are evidence-based, practical and responsive to institutional diversity.