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MID NORTH COAST

14 January 2026

Committee Secretary
Senate Education and Employment Committees
PO Box 6100
Parliament House
Canberra ACT 2600

Dear Committee Secretary

Committee's inquiry into the Universities Accord (Australian Tertiary Education Commission) Bill 2025

Regional Development Australia Mid North Coast (RDAMNC) welcomes the opportunity to provide a submission to the Committee's inquiry into the Universities Accord (Australian Tertiary Education Commission) Bill 2025 and the associated Consequential and Transitional Provisions Bill. RDAMNC strongly supports the establishment of the Australian Tertiary Education Commission (ATEC) as a key mechanism to implement the Universities Accord and provide long-term stewardship of Australia's tertiary education system.

Our submission has two purposes:

- To identify where the ATEC Bills enact core elements of the regional higher education policy platform RDAMNC has previously advanced to the Minister for Education, including managed growth, needs-based funding, equity for regional learners and mission-based stewardship.
- To critically evaluate whether regional communities and regional institutions will have an equitable and effective voice within the new ATEC arrangements, and to recommend amendments that would better secure this outcome.

Alignment with RDAMNC policy platform

The Explanatory Memorandum makes clear that ATEC is intended to be the system steward recommended by the Universities Accord, with a remit to plan for future needs, deliver on national priorities and improve equity and quality outcomes. Several elements of the Bills are directly aligned with the regional policy directions RDAMNC has previously set out.

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Stewardship, compacts and managed growth

The Bills establish ATEC as an independent statutory body with core functions that include negotiating mission-based compacts with Table A and B providers, monitoring system performance, and providing advice on policy settings, funding, and student demand across disciplines, cohorts and regions. The Explanatory Memorandum foreshadows that subsequent amendments will locate within ATEC the implementation of domestic managed growth and needs-based funding, and the allocation of international student commencements, explicitly linking mission alignment with load allocation.

This approach aligns closely with RDAMNC's advocacy for:

- A managed demand framework that recognises the distinct role of regional universities and uses caps and growth settings to support, rather than undermine, regional capacity.
- A stewardship model that connects institutional missions, regional skills demand and load allocation, including for international students, to avoid the destabilising effects that recent visa policy changes have had on regional institutions.

The Bill's objects – particularly the focus on ensuring the system has the capacity and capability to meet Australia's current and future student, skills and workforce demand – are consistent with RDAMNC's emphasis on the role of regional universities as anchor institutions in industrial transition, health and social care.

Equity, regional students and systemic barriers

The Bills embed an "objective of improving outcomes for persons facing systemic barriers to education" and expressly include "persons living in regional Australia" alongside Aboriginal and Torres Strait Islander peoples, people with disability and those from low socioeconomic backgrounds. ATEC must have regard to this objective in performing its functions, and may be asked to prepare reports and advice on improving access, participation and outcomes for these cohorts.

This framing reflects key elements of RDAMNC's policy platform:

- Recognition that regional location is an equity factor in its own right, and that regional universities disproportionately enrol students from multiple equity cohorts.
- The need for funding and governance mechanisms that explicitly track and improve outcomes for regional learners, rather than relying on generic national averages that mask spatial inequity.

Regional delivery and system monitoring

The Bills require ATEC to prepare an annual State of the Tertiary Education System report, which may include analysis of "the extent to which the higher education system is delivering services in and for regional Australia" and of outcomes for persons living in regional Australia. The Statement of Strategic Priorities,

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prepared biennially, must be developed through broad consultation with higher education stakeholders and students, and is expected to inform mission-based compacts and priority setting.

RDAMNC has argued for:

- System-level transparency about the distribution of higher education provision and outcomes across regions, and the need to match investment with regional population share and economic significance.
- A clear policy line of sight between national priorities, regional skills needs and institutional missions, rather than ad hoc, provider-by-provider engagement.

On these points, the Bills give effect to the policy architecture RDAMNC has called for, albeit at a high level of generality.

Concerning Gaps for Regional Communities

The Bill and its settings make welcome progress towards access equity for cohorts who are currently underserved, particularly at an individual student level. However, at a structural level there remains a risk that these settings may entrench or amplify existing inequities affecting regional institutions and communities, with implications for their capacity to contribute to the nation's long-term prosperity. It is important that regional industries and communities are explicitly recognised for the central role they play in underpinning Australia's broader economic base and the performance of secondary industries.

Gaps in regional representation and voice

While the Bills recognise regional Australia as a priority cohort and require ATEC to report on regional delivery, the mechanisms for ensuring an effective and ongoing regional voice in ATEC's governance and decision-making are weak compared with the more robust provisions for First Nations leadership.

Commissioners' expertise and representation

The Explanatory Memorandum notes that Commissioners "will bring balanced knowledge and experience across higher education, VET, tertiary education governance and administration, stakeholder consultation and engagement, and regional Australia", and that at least one Commissioner must have substantial VET experience. However:

- The Bill itself only requires that ATEC Commissioners "collectively possess certain knowledge and experience", without specifying regional higher education or regional development expertise as a mandatory attribute.
- In contrast, the First Nations Commissioner must be an Aboriginal person or Torres Strait Islander with significant understanding of issues affecting First Nations communities, and the Bill requires the establishment of a First Nations Advisory Committee.

Regional Australia is thus recognised as a priority in ATEC's functions, but not given equivalent structural representation at Commissioner or advisory committee level.

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Advisory committees and regional input

ATEC must establish a First Nations Advisory Committee, but additional advisory committees (including any regional body) are discretionary. Committees may be created “as the ATEC determines” and no specific requirement exists for a regional advisory mechanism, nor for regional representation in the Statement of Strategic Priorities consultation beyond generic references to “higher education system stakeholder representatives” and “higher education student representatives”.

For regional universities and communities that have historically been under-represented, reliance on general stakeholder processes is unlikely to be sufficient. This risks replicating the current pattern where metropolitan institutions and peak bodies dominate policy conversations, even when regional matters are on the table.

Mission-based compacts and regional differentiation

The Bill requires ATEC, when deciding the terms of compacts, to consider a provider’s “geographic location and local community” and provider goals and missions, and to negotiate terms in good faith. However:

- There is no explicit requirement that compacts for regional providers include tailored objectives on regional delivery, regional research, or regional workforce pipelines, nor that ATEC adopt benchmarks or metrics that reflect the higher cost and complexity of operating in thin regional markets.
- The Bill makes no distinction between regional and metropolitan providers in terms of how compacts may influence future managed growth, needs-based funding or international student allocations, despite the Explanatory Memorandum foreshadowing that these will be linked through ATEC in future.

This is directly relevant to RDAMNC’s concerns about the risk that equity loadings and higher per-student funding could incentivise metropolitan institutions to recruit equity cohorts traditionally served by regional universities, effectively cannibalising the base on which regional institutions rely.

Risks for regional institutions

Against RDAMNC’s policy platform, the current drafting poses several risks.

Equity incentives without guardrails

The Bills position equity, including for regional Australians, at the core of ATEC’s mandate and foreshadow a move to managed growth and needs-based funding. Without explicit safeguards, however, national equity incentives could:

- Encourage metropolitan providers to expand their intake of regional and other equity students (e.g. through online or satellite offers) to maximise needs-based funding, while regional universities face constrained growth and rising costs.



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- Undermine place-based models where regional institutions provide high-touch support and strong completion outcomes for complex cohorts, but with less brand visibility and political influence than metropolitan peers.

The Bills do not currently require ATEC to monitor or act on such distributional effects between metropolitan and regional providers.

Limited structural regional voice

ATEC will be formally independent and has broad discretion to consult and establish committees. In practice, without statutory requirements, regional voices risk being mediated through national peak bodies dominated by larger metropolitan institutions, or through ad hoc engagement with individual providers.

This stands in contrast to RDAMNC's policy position that regional institutions constitute a distinct market segment with unique functions, and that regional Australia "holds the keys" to much of the nation's economic, energy and supply chain resilience. If ATEC does not visibly embed regional representation at governance level, there is a risk that regional perspectives are treated as one of many competing "stakeholder views" rather than as a structural design principle.

Insufficient linkage to regional research and innovation

While ATEC has functions related to research standards, system capacity and innovation, the Bills are silent on the spatial distribution of research effort and funding. RDAMNC has argued for a dedicated Regional Research Fund to address the fact that only a very small proportion of research funding reaches institutions serving 40% of Australia's population.

Absent explicit attention to regional research in ATEC's objects, functions or reporting obligations, there is a risk that stewardship will focus primarily on teaching load, with regional research and innovation continuing to lag, despite their importance for health outcomes, productivity and commercialisation in regional economies.

Absence of regional infrastructure support

Regional universities also carry a significant burden of ageing, legacy infrastructure, often repurposed from former state education facilities, without a dedicated and sustained capital stream to support renewal. The cessation of the Education Investment Fund's dedicated regional round has removed an important lever for addressing these structural deficits and for ensuring that regional campuses remain fit-for-purpose for contemporary teaching, research and health and industry partnerships. Reinstating a dedicated regional higher education infrastructure program, with a specific focus on renewal of regional campuses and facilities, would complement the ATEC's stewardship role by enabling regional institutions to meet emerging skills and research needs in safe, modern and technologically capable environments.



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Recommendations for amendments

RDAMNC proposes a set of targeted amendments that would better embed regional representation and ensure that ATEC's work gives effect to the policy vision articulated in the Universities Accord and in our previous advocacy.

1. Strengthen regional representation in ATEC governance

- Amend section 59 (ATEC Commissioners collectively possess certain knowledge and experience) to require that at least one Commissioner has substantial experience in regional higher education and/or regional economic development, equivalent in specificity to the requirement for substantial VET experience.
- Insert an additional object in section 3 to “ensure that the higher education system delivers high-quality, sustainable tertiary education and research in and for regional, rural and remote Australia”, explicitly recognising regional provision as a core system goal.

2. Establish a Regional Tertiary Education Advisory Committee

- Amend section 25 to require ATEC to establish a Regional Tertiary Education Advisory Committee, mirroring the mandated First Nations Advisory Committee, with terms of reference to provide advice and recommendations on:
 - Participation, access and outcomes for regional students and communities.
 - The sustainability and capability of regional institutions and campuses, including infrastructure.
 - Regional research priorities and translation needs.
- Require that membership include representation from regional universities, regional TAFE/RTOs, regional development bodies (including RDAs) and regional student voices, ensuring expertise in both education and regional economic development.

3. Embed regional obligations in mission-based compacts

- Amend section 29 (Form and terms) to require ATEC, when determining compact terms, to:
 - Include specific, measurable indicators related to delivery “in and for regional Australia” for providers with regional campuses or missions, covering access, completion, regional workforce pipelines and regional research and innovation.
 - Consider the differentiated cost structures and infrastructure needs of providers serving thin regional markets, and reflect these in performance expectations and any future linkage to load allocation.

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- Include an explicit requirement that, when negotiating compacts with regional universities, ATEC consider the risk of displacement of equity cohorts to metropolitan providers as a result of needs-based funding, and adopt terms that preserve and strengthen regional institutions' role with these cohorts.

4. Safeguard regional equity under managed growth and needs-based funding

- In anticipation of future amendments linking ATEC to domestic managed growth and needs-based funding, insert a principle (either in the objects or in a new section) that growth and equity funding settings must not materially disadvantage regional universities or reduce the overall share of regional delivery relative to regional population and workforce need.
- Require ATEC, in its advice on “student demand... across geographical regions” and system capacity, to publish analysis of:
 - The distribution of Commonwealth supported places and international student commencements between metropolitan and regional providers.
 - The impact of equity loadings and needs-based funding on regional institutions and communities.

5. Elevate regional research and innovation

- Expand ATEC's functions in section 11 to include advising on the spatial distribution of research funding and activity, and on mechanisms to strengthen research and innovation capacity in regional universities, including consideration of a dedicated Regional Research Fund or similar instrument.
- Require the State of the Tertiary Education System report to include a specific section on research and research training “in and for regional Australia”, including funding levels, translation activity and impacts on regional health, industry and community outcomes.

6. Guarantee structured regional consultation

- Strengthen section 12 and section 43(3) to explicitly require consultation with regional higher education providers, regional peak bodies and regional development organisations when ATEC performs functions that materially affect regional provision, including the preparation of the Statement of Strategic Priorities and the design of any future load allocation frameworks.
- Require ATEC to report annually on how regional stakeholders have informed its advice, compacts and strategic priorities, similar to the emphasis on transparent First Nations engagement.

Conclusion

RDAMNC supports the establishment of ATEC as a vital step in delivering the Universities Accord vision for a more equitable, coherent and forward-looking tertiary education system. The Bills as drafted give effect to



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several elements of RDAMNC's regional policy platform, particularly around stewardship, managed growth, needs-based funding and recognition of regional Australians as a priority equity cohort.

However, without stronger structural guarantees of regional representation and explicit safeguards in the design and operation of mission-based compacts, managed growth and needs-based funding, there is a material risk that regional institutions and communities will not have an equitable voice in the new arrangements and may be further marginalised over time.

RDAMNC would welcome the opportunity to appear before the Committee to further elaborate on these issues and to work with Government, ATEC and regional stakeholders to ensure that ATEC fully realises Australia's national ambitions for regional higher education, research and workforce development.

Sincerely,



Dr. Madeleine Lawler
CEO Regional Development Australia Mid North Coast (and Norfolk Island)