



**LEGISLATIVE ASSEMBLY**  
FOR THE AUSTRALIAN CAPITAL TERRITORY

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STANDING COMMITTEE ON ECONOMY AND GENDER AND ECONOMIC EQUALITY  
Mr James Milligan MLA (Chair), Ms Suzanne Orr MLA (Deputy Chair),  
Ms Laura Nuttall MLA

# **Submission Cover sheet**

## **Inquiry into Unpaid Work**

Submission number: 21

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Mr James Milligan MLA, Chair  
ACT Legislative Assembly  
Standing Committee on Economy and Gender and Economic Equality

via: [LACommitteeEGEE@parliament.act.gov.au](mailto:LACommitteeEGEE@parliament.act.gov.au)

**12 June 2024**

Dear Mr Milligan,

### *Re: Inquiry into Unpaid Work*

The University of Canberra notes the terms of reference of this Inquiry and particularly inclusion of ‘unpaid placements and traineeships’ in the scope.

The University welcomes opportunity to provide information on our work integrated learning (WIL) and practical placements.

In this letter we outline high level comments. We request a dedicated hearing with the Committee to discuss these more thoroughly.

We draw attention to the extensive review of Australia’s higher education system, led by Professor Mary O’Kane, underpinning the *Australian Universities Accord*. The Accord final report includes discussion and recommendations regarding WIL and placements. The Australian Government has begun to respond to these and announced *Commonwealth Prac Placement* support for some students in nursing, teaching, and social work.

#### **University of Canberra and work-integrated learning (WIL)**

We meet workforce needs through providing appropriately prepared graduates through partnering with industry on workplace and clinical placements for our students. During 2023 Careers UC delivered 917,182 internship and placement hours.

University of Canberra is sector leading for WIL. We are a university with a civic mission for Canberra and a focus on professions. Our graduates across all study areas enjoy high employment rates and we are proud to meet the workforce needs of Canberra and beyond. We facilitate WIL across all levels at the University, including internships for PHD candidates through our *PhD Plus* program. University of Canberra has a strong focus on graduate outcomes and is working towards WIL embedded in every undergraduate course for every student under our *Professional Practice Core Framework*.

#### **Distinguishing placements from work**

First and foremost, University of Canberra maintains that it is important to clarify the definition of WIL and how it is distinguished from paid work. Recent public focus on ‘placement poverty’ has confused this.

A WIL experience is legally unpaid when it meets the definition of a vocational placement under the *Fair Work Act 2009*, which applies to both domestic and international students.

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Some host organisations may choose to pay the student a stipend to assist them with any out-of-pocket expenses associated with the WIL experience, such as travel or accommodation. This is at the host organisations discretion and does not represent a wage.

### Placement poverty

University of Canberra is cognisant of cost-of-living pressures experienced by some students, including those on clinical placements.

We are aware of the disproportionate impact WIL can have on students from equity groups. This might include double rents for regional and remote students travelling for placements, and additional child-care costs for students with children. WIL support needs for students with a disability may result in costs to both the student and the University.

Many of our students are independent and do not receive Centrelink benefits. While WIL placements are integral to their study, time spent on placements may result in loss of income from usual employment. At present, the 'age of independence' to be eligible for some Centrelink payments is 22 years old. Yet the 'bank of mum and dad' is not available to all young adults. The demographic profile of the University of Canberra shows that a significant proportion of undergraduates are non-school-leavers, aged mid-twenties. These students seek employment and establish independence before attending university.

University of Canberra has a range of support measures in place for students. The University facilitates a *WIL Support Scheme* for students in need, funded in part by the *Student Services and Amenities Fee* fund, and the *Higher Education Participation and Partnerships Program*. In 2023 the University provided a total of \$208,589.50 of financial support to 352 students who were impacted by their placements.

In November 2023 the ACT Government announced a new incentive program for nursing, midwifery, and allied health students, including those at the University of Canberra. The program comprises two streams for eligible students, *Cost of Living Stipend* of up to \$3000 per annum over three years, and *Placement Support Grants* of up to \$1000 per clinical placement.

We welcome this vital support from the ACT Government for health students at the University of Canberra. Yet we join the multitude of voices in the higher education sector calling for additional student support across more disciplines.

In its final report, the Australian Universities Accord Panel recommended substantially increasing investment in the Research Training Program and raising the minimum stipend rate for PhD students. Universities had hoped this would be funded in the latest federal budget, however the Australian Government is yet to respond.

### Cost to university and availability of placements

We note the scope of the Inquiry into unpaid work. A related issue for the University is the availability and cost of clinical placements in health.

This is a matter of particular concern to us as the dominant provider of health and nursing graduates in Canberra, and of these courses to both domestic and international students.

Our campus includes a health precinct comprising the University of Canberra Hospital, the Icon Specialist Medical Centre, and the Faculty of Health Clinical Hub. These provide public facing health services for the community, in addition to research opportunities and some availability of clinical placements for University of Canberra students.

The strong current and future demand for nurses and health professionals is well known. This also extends to the aged care and disability sectors. The challenge of filling this critical workforce is compounded by high proportions of workers exiting or citing burnout following the COVID pandemic. Jobs and Skills Australia has found that the Health Care and Social Assistance industry accounted for the largest share of people who changed jobs in the year ending February 2022.

The need to enrol more students in health and nursing courses is clear, and demand for university places is strong. However, the availability and cost of clinical placements is preventing universities from offering more places.

Clinical placements are both essential and beneficial to students. They are a requirement for accreditation and a core component of courses at the University. However, places are scarce, and universities struggle to find enough providers, especially in proximity to campuses. This also exacerbates cost of living pressures on students.

#### International students and work-integrated learning

The University of Canberra has concerns for international students undergoing work placements.

A rule around international student visas exacerbates cost of living pressures on students. From 1 July 2023, the Australian Government reintroduced work rights for international students, capped at 48 hours per fortnight. Hours undertaking work-integrated learning activities that are considered non-compulsory are included in the 48-hour work cap. This measure was implemented to safeguard international students. However, an unintended policy outcome has seen some international students excluded from their ordinary paid employment while on work integrated learning.

#### About the University of Canberra

The University is incorporated under the University of Canberra Act 1989 of the Australian Capital Territory. We are committed to serving the people of Canberra and the region through professional education and applied research.

University of Canberra is ranked among top universities globally by both Times Higher Education (THE) and QS World University Rankings and is one of the top 100 young universities under the age of 50 years.

The University has released *Connected*, a decadal strategy that sets out the long-term ambitions and objectives for our university. It has at its core explicit commitment to our staff and students, to our place in Canberra and the region, and to the Ngunnawal people.

Our ambition for the coming 10 years is to be a global leader in driving equality of opportunity. A commitment that ensures we are the most accessible university in Australia; building an international identity for University of Canberra that celebrates, and is built upon, the importance of our place, one of national and international decision making. We proudly embrace our role as the university of the nation's capital.

The University of Canberra has had long-standing excellence in both teaching and mission-oriented problem-solving research and continues to be influential in a range of areas including health and wellbeing, nursing, sport and exercise physiology, education, information technology, communications, architecture and design, and science.

We thank you for your ongoing interest and support of the University of Canberra. My office will be in contact with the Committee secretariat to arrange a time to discuss these matters further.

Yours sincerely,

Professor Michelle Lincoln

Deputy Vice-Chancellor Academic

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