

## Regional Universities Network (RUN) Response to the Higher Education Standards Panel's consultation paper: Amending the Higher Education Standards Framework: Provider Category Standards

### **Q1: Does the revised description of an “Institute of Higher Education”, transcribed [in the consultation paper] and in Appendix C, provide sufficient clarity for providers seeking to enter the category?**

Overall, the revised description is clear. However, the proposed criterion 2 is not necessary as academic and teaching staff are already required to undertake active scholarship and research in their discipline under the existing Standard 3.2.3a. In contrast, Criterion 6 of the ‘University College’ criteria states that the ‘higher education provider... demonstrates scholarly activities and outcomes that inform teaching, learning, and professional practice’, which implies that this criterion applies at the institutional level and is not applied to individual staff. This disparity should be resolved by removing or amending proposed criterion 2 of the ‘Institute of Higher Education’ criteria.

If the proposed criterion 2 is to be retained, it should be made clear that it is a general description only of the characteristics of an Institute of Higher Education and does not require separate/additional regulatory activity by TEQSA in relation to individual teaching staff.

### **Q2: Do you foresee any implementation issues in creating the new “University College” category?**

The use of the term “university” has traditionally been reserved for higher education institutions which have considerable research requirements and undertake a range of other activities, as set out under the establishing legislation. A key implementation issue will be ensuring that the public understands that the new “University College” category is distinct from a university and does not have to fulfil the same research requirements, and that individual “University Colleges” are not necessarily associated with existing universities.

There should be clear communication on the transition arrangements for the one current single ‘Australian University College’.

**Q3: Are the requirements in the new “University College” category sufficiently clear and appropriate to uphold quality and facilitate institutional progression?**

Yes.

**Q4: Is there sufficient clarity for providers about the distinct requirements in the revised “Australian University” category for providers offering courses of study in three or more broad fields of education versus those with a “specialised focus”?**

Yes. The main challenge will be for potential or current students and the public at large to understand the difference between institutions in the specialised sub-category, rather than the differences between Australian universities and those with a specialised focus.

**Q5: Do you consider the benchmarks above (i.e. that research be “world standard and/or be of national standing in fields specific to Australia”) are appropriate for the revised “Australian University” category standard?**

The principle that research at Australian Universities should be at “world standard and/or be of national standing in fields specific to Australia” is in itself appropriate. However, implementation will be problematic.

The point of contention will be how to define and assess “world standard” for each of the 2 digit, and potentially 4 digit, fields of research (FOR) conducted at Australian Institutions. Additionally, the process of mapping FOR across to fields of education (FOE) is as yet unclear and will potentially be quite challenging (for example, the consultation process already noted cases where the FOR may map to more than one FOE). RUN suggests that TEQSA works in consultation with universities in the mapping exercise.

Finally, it is unclear why satisfying the condition of world standard research in 30% or 50% of the FOE is the appropriate benchmark for university status. Why not 20% or 80%? Where is the evidence or argument that having world standard research in 30% or 50% of the FOE’s taught at the university is sufficient for recognition of University status?

**Q6: What factors should TEQSA consider in determining whether the research at an Australian University is “world standard”, in particular where an existing benchmarking exercise, such as the ERA, is not available?**

It is well recognised that research by definition should lead to discovery and new knowledge, as well as research training. If research is done well, it will identify knowledge gaps and undertake rigorous methodology and analysis to find the answers. There are a number of metrics that can be used to indicate which research is of excellent standard:

- Income to support research, whether nationally competitive or sponsored by various organisations
- Peer-reviewed publication and citation
- Policy development
- Impact measures, where research outcomes have been applied and taken up by society

- Patent and IP protection
- Awards, appointments and other forms of peer recognition.

All of the above are indicators of research endeavour, outcomes and effectiveness. The challenge lies in measuring them accurately and fairly, and then how such metrics are benchmarked to indicate world standard or otherwise. Caution must be exercised in developing which indicators and processes will be used to determine the standard of research since these processes will influence the way universities prioritise and support research endeavour. For example, if only publication citations are used then universities may incentivise publication at the expense of societal impact. A more recent criticism of Australian research has been the relatively low level of impact our research has on business and community productivity and quality of life i.e. a low amount of applied outcomes. For this to change, there needs to be greater recognition, reward and respect for applied research by all levels of Government and community – this will not happen if the focus of world standard is on publication citations and nationally-competitive research income. In addition, although volume is not a sufficient indicator of research quality or impact, there does need to be some sustained level of research output in a particular FOR if it is to be recognised as a research strength.

While it endeavoured to measure engagement and impact of universities, the Engagement and Impact for Australia (EIA) exercise was not refined and is not robust enough in its current form to be used to determine if research is of “world standard”.

It is important to note that universities are already required to produce and report many datasets and metrics pertaining to research outputs, quality and impact; the burden of additional reporting is not desirable or manageable and should be avoided if possible. As such, the use of existing measures is favoured, noting that the two largest existing systems, ERA and EIA, are insufficient to provide a full picture of a university’s ‘world standard’ research performance. In addition, ERA does not adequately assess HASS disciplines.

We support the creation of a matrix or mosaic of measures, allowing for data to be drawn from a range of existing sources, to fully account for research activity. It may be that such data are automatically harvested and combined to provide an initial assessment for ‘world standard’ (possibly using expert panels) with universities being invited to provide additional data or a rejoinder only by exception (e.g. where not deemed as meeting world standard).

We suggest that TEQSA works in consultation with universities to develop such a matrix or mosaic of measures.

**Q7: On what basis should TEQSA assess whether an Australian University meets the benchmark for research of “national standing in fields specific to Australia”?**

Research in fields specific to Australia will have a peer audience confined mostly to Australia. It would be useful to clearly indicate which they are. While all the above metrics will apply to such research, measuring the quality and impact of the research relative to world standard will not only be difficult to achieve, but most likely will be disadvantaged. It is suggested that such research is

assessed for world standard benchmarking by an expert panel, comprising mostly Australian experts but also including discipline experts that have not necessarily developed a track record in the specific area. The expert panel would determine a threshold of activity that must be met to determine “national standing”, with opportunities for a university to provide additional data or a rejoinder only by exception (e.g. where not deemed as meeting national standard).

**Q8: Do the draft criteria for the revised “Overseas University in Australia” category provide sufficient clarity for providers wishing to enter the category?**

Yes.

**Q9: Are the requirements for industry engagement, civic leadership, and community engagement sufficiently clear in the draft standards?**

RUN proposes the following changes to the text in the PCS categories with regard to requirements for industry engagement, civic leadership, and community engagement:

**B1.3 ‘Australian University’ Category Standard statement** (Higher Education Standards Panel, Amending the Higher Education Standards Framework: Provider Category Standards, Consultation Paper, p. 32)

13. demonstrates ~~strong reciprocal civic leadership, engagement and a commitment to social responsibility~~ with its local and regional communities, ~~and a commitment to social responsibility.~~

**Industry engagement, civic leadership, and community engagement statement** (Higher Education Standards Panel, Amending the Higher Education Standards Framework: Provider Category Standards, Consultation Paper, p. 16)

In the draft amendments, a provider in the ‘University College’, ‘Australian University’ or ‘Overseas University in Australia’ categories must:

demonstrate engagement and a commitment to social responsibility with a range of communities, including employers, industry, and the professions, and community groups in areas which it offers courses of study across education, research and service related activity. This mutually beneficial engagement may include, but is not limited to, curriculum development, professional engagement, work-integrated learning, ~~and~~ research partnerships, and civic leadership.

~~demonstrate strong civic leadership, engagement with its local and regional communities, and a commitment to social responsibility.~~

**Q10: Do you have any comment on the draft amendments to the criteria for seeking authority for self-accreditation (Part B2 of the Threshold Standards), described in Appendix D?**

There is currently no differentiation in the expectations of internal systems for course review and approval and quality assurance for a provider applying for partial or full accreditation authority.

A provider that is seeking an unconstrained authority to deliver courses in areas that it does not currently deliver in but “may deliver” in the future, should be required to meet a higher threshold than an institution that only seeks accreditation limited to the courses it currently teaches and therefore has an established history. An unconstrained authority to develop and accredit courses in new areas without prior experience of delivery would require robust and mature accreditation, course review and improvement, as well as quality assurance mechanisms akin to an Australian University.

**Q11: Do you think there should be provision for greenfield entry to the “University College” category as a destination, as well as a pathway to the “Australian University” category?**

Given Australia’s growing population, there may be the need to establish new universities in the future. The amount of time it would take under the current PCS to establish a new university (estimated to be 10 years) is lengthy and would potentially make it difficult to respond to Australia’s higher education needs.

The criteria provide appropriate references to both applicable “University College” and “Australian University” criteria.

**Q12: Do you have any comments on the implementation issues associated with greenfield universities?**

The key challenge in approving an application for a greenfield university will be in determining how realistic and achievable the plans for such an institution are, and monitoring progress against these plans. If such plans fail to be realised and an institution does not meet the “Australian University” criteria within the specified period, this may have implications for enrolled students who may be expecting to be students or graduates of an Australian University.

**Q13: Do you identify any issues of concern for providers in the Australian University of Specialisation and Australian University College categories that transition to the new “Australian University” category – either with or without a “specialised focus”?**

There should not be an expedited process for the current Australian University College to become an Australian University.

Provision could be made in transitional legislation for this institution to continue its current path to University status. Transitional legislation should also ensure that the specialised focus of the existing “University of Specialisation” is maintained in any change to a single “Australian University” category.

**Q14: Are there other aspects of the transition of providers occupying the Higher Education Provider category to the new categories that the Panel has not considered but should?**

No comment.