

4 May 2022



Secretariat
Higher Education Standards Panel
Department of Education, Skills and Employment
CANBERRA ACT 2601

Email: HigherEd@dese.gov.au

Dear Secretariat,

Re: Research translation and the Higher Education Standards Framework

The University of Melbourne welcomes the opportunity to respond to the Higher Education Standards Panel's Consultation paper on Research translation and the Higher Education Standards Framework.

The University is keen to work with the Australian Government, industry and other external organisations to continue to increase the rate of research translation in Australia, and to ensure that the potential contribution of university research to social and economic wellbeing is realised. We recognise that improving links between universities and industry is a key priority for the Government, and that its University Research Commercialisation Action Plan includes a suite of initiatives intended to achieve this.

While the University welcomes a broad commitment to supporting research translation, we do have concerns about the amendments to the Higher Education Standards Framework proposed in the Consultation paper. Our primary concern relates to whether amending the criteria specified for the 'Australian University' is an appropriate means to encourage additional translational research. The role of the Standards Framework is to safeguard quality and integrity in the higher education sector by establishing a set of minimum standards required of providers. The Standards are not intended to "help universities to demonstrate their support for the Government objectives".

The proposed amendment has the potential to have an undesirable impact on institutional diversity in Australia's university sector. High-performing research systems are best supported a diverse mix of basic and applied research that covers the full spread of disciplines. Hence, it is significant that smaller institutions whose research activity is focused on basic rather than applied research may fail to meet the proposed criteria, even if the research is high-quality and underpinned by effective integrity policies and practices. It is questionable whether a measure that may impede rather than encourage institutional diversity is the right approach to improving translation outcomes.

In any case, changes to the criteria for the Australian University need to be carefully considered. The recent Review of the Provider Category Standards examined the possibility of relaxing the requirement that institutions using the 'university' title be research active. The Review recommended retaining this requirement following a lengthy sector consultation that examined the implications of any change. There has not been any equivalent assessment of the merits of the amendment proposed in this consultation.

It is vital that any assessment framework avoid the creation of additional unnecessary or onerous red-tape, including excessive data collection or evidentiary requirements. Should the Standards Panel proceed with an amendment to the Provider Category Standards in support of research impact and translation, the following alternative wording is suggested:

Demonstrates systematic support and identifies opportunities for translation of research findings to measurable impacts on the economy, society, environment or culture, in addition to discipline development through academic research.

While this would not avoid the implications for sector diversity that come with embedding specific kinds of research into the criteria of Australian University, it aligns the Standard with the Australian Research Council definition of Research Impact and avoids an unnecessarily narrow focus on commercialisation.

For further information, or to discuss the submission, please don't hesitate to contact me at dvc-research@unimelb.edu.au.

Kind Regards,



Professor James McCluskey, AO FAA FAHMS
Deputy Vice-Chancellor (Research)
Chair of Microbiology and Immunology
Redmond Barry Distinguished Professor
The University of Melbourne