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Dear Professor O'Connor,

**Re: Amending the Higher Education Standards Framework: Provider Category Standards**

The University of Melbourne welcomes the opportunity to respond to the Higher Education Standards Panel's Consultation Paper *Amending the Higher Education Standards Framework: Provider Category Standards*. The Provider Category Standards have a key role in signalling the configuration of Australia's higher education sector, and in indicating the differentiation and choice between the various types of education on offer. We are pleased to contribute to the discussion on how the reforms recommended in the 2019 Review of the Higher Education Provider Category Standards are to be implemented.

The following comments focus on the proposed changes to the 'Australian University' category. More generally, however, we note that the reforms to the Provider Category Standards recommended in the Final Report of the Review are positive. The reduction in the number of categories from six to four, and the introduction of a new category for larger non-university higher education providers, are sensible reforms. These changes will make the Provider Category Standards easier to understand for students, industry and the public, and ensure that the categories better reflect the make up of Australia's higher education sector. We commend the Australian Government for committing to these changes, and the Higher Education Standards Panel for its work in engaging stakeholders on their implementation.

**'Australian University' category**

The University of Melbourne's response to the 2019 Review emphasised the importance of maintaining restrictions on the use of the 'university' title. While it has been argued that relaxing these restrictions would encourage greater diversity in Australia's higher education system, there is no reason to think it would have this effect. Indeed, there is a danger that allowing current non-university providers to re-brand as universities would undermine diversity, by negating a means by which differences between institutions are signalled to students and the public. Moreover, lowering the bar to accessing the university title would pose considerable risks to the reputation of Australia's higher education sector. The global standing enjoyed by Australia's universities has underpinned our capacity to attract research talent and students from around the world. There is a genuine risk that relaxing the restrictions on the university title would weaken this standing.

We are pleased that the Review recommended maintaining these restrictions – specifically those that require that an institution be active in both teaching and research if it is to use the title – and that the Government has adopted this recommendation. We also welcome the proposed introduction of benchmarks for research quality and quality. As noted in the Final Report, the current standards imply a low research threshold for universities.

... to achieve 'Australian University' status, a provider could demonstrate the research requirements by delivering a single undergraduate and postgraduate course, undertaking a single research project in each of the three required fields of education in a given year, and publishing at least one peer-reviewed paper from each project in any form at any level of quality. This

possibility is concerning as such a level of research at an 'Australian University' would not meet any meaningful or reasonable threshold for research performance expected by TEQSA or the wider community. (p.33)

The proposed introduction of benchmarks for research quality and quantity reflects the aim of ensuring that institutions that are branded as universities have a level of research intensity that justifies their use of that title. The University of Melbourne supports this.

We also welcome the two benchmark standards identified in the Consultation Paper: 1) "research that is world standard measured using best practice indicators"; and 2) "research of national standing in fields specific to Australia". University research makes a substantial contribution to addressing challenges that are unique to Australia. A good example is the Doherty Institute's work in responding to the COVID-19 crisis. Research on the impact of the pandemic on remote Indigenous communities will also be crucial. It is important to recognise that the two thresholds are not mutually exclusive – world standard research can, and usually does, address issues of import to Australia. The inclusion of a second benchmark standard however calls out unique Australian research interests and will help to ensure that this important research is not overlooked.

### **Measuring 'world standard' research**

The Consultation Paper invites comment on how to determine whether research at an Australian University meets the 'world standard' benchmark. Without proposing specific measures for defining this benchmark, the University of Melbourne urges that determinations should be based on transparent, clearly articulated criteria that capture research intensity of a given institution. Since the proposed benchmark is intended to ensure that Australia's universities are research active at a level consistent with community expectations, it is important that this benchmark supports public confidence through transparency in its design and application.

We also argue that the proposed benchmark should draw from data that is already available. There exists already extensive data on the research output and performance of Australia's universities, including that collected for Excellence for Research in Australia (ERA) evaluations and the Higher Education Research Data Collection. Significant administrative effort is expended by both universities and Government bodies in the collection of this data, which should be sufficient for the purposes of determining or administering the new research quality and quantity benchmarks. More generally, the benchmark should be designed and applied with the aim of minimising the administrative effort entailed.

For further information or to discuss this submission Professor Richard James, Deputy Vice-Chancellor (Academic) can be contacted on (03) 9035 4800 or [r.james@unimelb.edu.au](mailto:r.james@unimelb.edu.au).

Kind regards,



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