

Introduction

Independent Higher Education Australia IHEA represents the majority of Australia's registered and accredited independent higher education and dual sector providers, including all of Australia's independent universities, and has members with campuses across Australia.

IHEA members educate students in a range of disciplines including Law, Engineering, Agricultural Science, Architecture, Business, Accounting, Tourism and Hospitality, Education, Health Sciences, Theology, Creative Arts, Information Technology and Social Sciences.

IHEA members operate with both for-profit and not-for-profit business models and educate domestic and international students in undergraduate and postgraduate programs. The Australian independent higher education sector comprises more than 140,000 students and 120 institutions, with independent providers variously accredited to offer courses across the full AQF range (diplomas up to doctorates).

IHEA members consist of a number of independent universities and university colleges. These include:

- Bond;
- Torrens University;
- Avondale University;
- University of Divinity;
- Moore Theological College; and
- Alphacrucis University College.

Consultation Approach

IHEA welcomes the partnership approach to the threshold standards and acknowledges that this is crucial to delivering real and tangible benefits to all stakeholders including providers, students, TEQSA and DESE.

Background to this Submission

Research translation and the Higher Education Standards Framework Consultation paper from the Higher Education Standards Panel In his letters of appointment to the Higher Education Standards Panel in June 2021, the Hon Alan Tudge MP, the current Minister for Education and Youth, requested the Panel's advice on draft amendments to the Higher Education Standards Framework Threshold Standards to ensure that opportunities to translate research findings into real world impacts are routinely considered under institutional research policies and strategies.

Draft amendment to **Part B** of the Threshold Standards incorporating reference to research translation.

Proposed amendment is in red text.

B1.3 'Australian University' Category A higher education provider registered in the category offers an Australian higher education qualification.

The higher education provider:

14. demonstrates systematic support and identifies opportunities for translation of research findings to measurable, real-world impacts, including commercialisation



IHEA RESPONSE

IHEA members as mentioned earlier comprise for profit universities, independent universities, two university colleges, and 68 Institutes of Higher Education. Our members are a diverse group. Overwhelmingly their response is positive in relation to research translation.

However, we ask for clarity on what criteria will be used to define the 'real world impacts'. Will this be the domain of the Department? What tools does the Department envisage using for the purposes of measuring 'real world impacts' and will this require additional reporting obligations on the part of the providers? If so, is it suitable for the Department to measure real world impacts?

IHEA is also concerned about the meaning of the word 'commercialisation'. The connotation suggests a for profit (financial) motive when there may be other ways in which research generates real world impact. IHEA members have further expressed concern that independent universities of the future which might, without any recourse to public funds, engage in outstanding blue-sky research for its own sake, would suffer from the imposition of a 'commercialisation' aspect. Despite the research being in the national interest. This imposition of 'commercialisation' may limit or prevent this type of research from occurring from occurring.

We seek further explanation as to what this means. Given the expansive profile of our members it could mean different things to providers in the same sector. We respectfully ask who or what instrument will assess universities in meeting this criterion. For example, will it be subject matter experts or under the domain of TEQSA. We suggest that the aim of research translation and commercialisation be managed through funding avenues rather than a basic standard.

Further clarity is sought from the Department in relation to this matter.

Contact

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