

# RESEARCH TRANSLATION AND THE HIGHER EDUCATION STANDARDS FRAMEWORK CONSULTATION SUBMISSION

29 April 2022

Universities Australia (UA) welcomes the opportunity to make a submission to the Higher Education Standards Panel (HESP) consultation paper on research translation and the Higher Education Standards Framework (Threshold Standards).

UA is the peak body for Australia's 39 comprehensive universities. Our member universities are spread across Australia in both regional and metropolitan areas. They educate more than a million students each year, undertake all of the university research in Australia and engage globally to add to the country's stock of knowledge, as well as Australia's economic and social wellbeing.

## RECOMMENDATIONS

Universities Australia recommends to the HESP that:

- The proposed amendment, part B1.3.14, concerning research translation, including commercialisation not be added as a criterion that all providers registered under the 'Australian University' category must satisfy, as it concerns matters of policy rather than standards.
- If the HESP is minded to recommend to the government that policy is introduced into the Threshold Standards, an alternative approach be considered to amend part A4.1. as follows, in recognition of the purpose of research translation and the fact that commercialisation is but one method by which university research is translated for societal benefit:

A4.1.(f): research translation for societal benefit, including research commercialisation.

## CONTEXT

Following Professor Peter Coaldrake's 2019 review of the higher education provider category standards, the government introduced new requirements into the threshold standards for Australian universities to demonstrate particular volumes of research activity and research quality (B1.3.16 to B1.3.19).

Separate to these reforms, the government has and is continuing to undertake a comprehensive policy reform package that provides significant incentives for universities to further raise their level of industry engagement and applied research. It should be noted, however, that universities already perform about 42

per cent of all applied research in the country, on par or slightly ahead of industry, which performs about 41 per cent of applied research in Australia.

These policy reforms, implemented and ongoing, include:

- changes to the Research Block Grant;
- changes to the ERA and EI assessment exercises;
- the creation of Australia's Economic Accelerator;
- the creation of 800 Industry Fellowships and 1800 PhD industry internships;
- changes to the governance and operations of the ARC as expressed in the December 2021 letter of intent from the acting Minister for Education. These changes represent an increased prioritisation of research towards research translation and select industry sectors;
- introduction of the Trailblazer Universities program; and
- introduction of the National Priorities and Industry Linkage Fund (NPILF) program.

## THE CURRENT PROPOSED CHANGES

### ***Research translation – including through commercialisation – is a matter of policy, not standards***

The suite of policy reforms outlined above provide a formidable set of incentives for universities and industry to collaborate and commercialise research. UA submits that the issue of research translation is one of policy, rather than the fundamental constitution of a university, or the regulatory benchmarks for university status.

The recent introduction to part B of the Threshold Standards of a quality element to research was appropriate as it concerns the characteristic of a key function of universities. However, research translation, including commercialisation, is a process and an output of research – much of which lies outside the control of universities. This is due to the nature and timeframes of research translation, including commercialisation and adoption of public good changes.

The example of activities outlined on page one of the consultation paper are matters of policy and are also highly subject to the decisions of parties outside of the control of universities:

*Evidence may include but is not limited to institutional policy settings, appropriate IR structures in place to support innovation, demonstrated performance in linkage funding, industry earnings, evidence of end-user uptake and other real-world impacts.*

Furthermore, research translation is not a 'minimum standard', which is the object of the threshold standards, but rather a process and an output of research as noted above.

### ***Should the inclusion of research translation proceed, amend A.4.1***

Should the HESP proceed with the proposal to include research translation in the Threshold Standards, UA advises that it would be preferable to amend the section of the standards (part A 4.1) which sets the minimum requirements for research that all registered institutes of higher education must meet if also registered in a provider category that requires the demonstration of a minimum level of research activity.

This approach would ensure that the process and outcomes of research (i.e. research translation and outcomes) such as commercialisation and public good, are included in the section dedicated to an articulation of the characteristics of research. Specifically, the amendment A.4.1.(f):

- 4 Research and Research Training
- 4.1 Research

1. Research and its associated activities are conducted in accordance with a research policy framework that is designed to achieve:
  - a. ethical conduct of research and responsible research practice;
  - b. clarification of ownership and management of intellectual property;
  - c. successful management of research partnerships;
  - d. clarification of requirements for publication and authorship, and
  - e. resolution of allegations of misconduct in research;
  - f. **research translation for societal benefit, including commercialisation.**

## CONCLUSION

Policy issues should not be conflated with regulatory issues of minimum standards. UA recommends that inclusion of research translation in the Threshold Standards should not proceed.

If HESP is minded to recommend to the government inclusion of research translation in the Threshold Standards, an alternative approach is presented that deals with research translation under the section dedicated to research and its associated activities, specifically the amendment of part A4.1.

UA is happy to discuss any of these points with HESP and looks forward to working with the government in ensuring the continuation of an excellent and robust university system that is so essential to underpinning Australia economic and social wellbeing.