

**OFFICE OF THE VICE-CHANCELLOR**  
Professor Geraldine Mackenzie  
Vice-Chancellor



23 October 2020

Via email to: [eec.sen@aph.gov.au](mailto:eec.sen@aph.gov.au)

**Re: Submission to the Inquiry into Higher Education Legislation Amendment (Provider Category Standards and Other Measures) Bill 2020**

The University of Southern Queensland (USQ) provides the attached submission to the Inquiry into Higher Education Legislation Amendment (Provider Category Standards and Other Measures) Bill 2020.

Thank you for the opportunity to make this submission.

Yours sincerely

Professor Geraldine Mackenzie  
Vice-Chancellor

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## **Submission to the Inquiry into Higher Education Legislation Amendment (Provider Category Standards and Other Measures) Bill 2020**

The University of Southern Queensland (USQ) is supportive of the Bill and its aims. In particular, the University is supportive of the Bill:

- Giving effect to the outstanding recommendation from the *Review of the impact of the TEQSA Act on the higher education sector* to refer to the Threshold Standards as a single unified framework;
- Including reference to the new Australian Qualifications Framework quality type 'undergraduate certificate' in the definition of 'higher education award';
- Improving regulation of Australia's higher education sector through a small number of other measures, including to ensure student records can be appropriately handled following a provider ceasing to operate and to protect the term 'university' as it appears in Australian internet domain names; and
- Providing flexibility for higher education providers to use Indigenous student assistance grants to assist prospective, as well as existing, Indigenous students.

However, in giving effect to the Provider Category Standards, USQ advocates strongly for the following:

- In considering the benchmarks 'that research should be 'world standard and/or of national standing in fields specific to Australia', USQ's key concern is around how quality is to be evaluated. It has been suggested that standard indicators may include peer review journal papers, rate of publication, weighted publications, success and competitive grant rounds, other direct funding, citation analysis, impact measures and existing assessment exercises. While these indicators are satisfactory mechanisms for evaluating research quality, it is important to note that citation analysis and impact measures provide the greatest value. A simplistic definition of research quality could potentially drive a singular set of behaviours across the sector.
- As a comparative measure, ERA is acceptable for highlighting the differences in research performance between universities. However, it is not effective in measuring overall research quality owing to the different assessment regimes for different disciplines. USQ suggests that there should be no further consideration of how research quality should be measured for the Provider Category Standard until after the current review of ERA to enable an assessment of whether or not a more consistent and clearly international benchmarked measures can be developed that will take into account different disciplines. If a suitable and bias-free process is not used, this could drive universities to push STEM-based disciplines as their major focus, reducing the representation of HASS Disciplines across the sector.
- Similarly, when considering the basis for whether an Australian University meets the benchmark for research of 'national standing in fields specific to Australia', there is currently no clear standard for identifying the quality and an average quality measure will inevitably lead half these fields of research to be assessed as below the benchmark. This will almost certainly require an assessment by experts – most of whom should be drawn from outside the University sector to reduce bias.