



**Office of the Deputy Vice-Chancellor  
(Education)**

The University of Western Australia  
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22 October 2020

Mr Alan Raine  
Committee Secretary  
Education and Employment Legislation Committee  
PO Box 6100, Parliament House  
CANBERRA ACT 2600

Dear Mr Raine

**Higher Education Legislation Amendment (Provider Category Standards and Other Measures) Bill 2020**

Thank you for the opportunity to comment on the Bill. The University of Western Australia (UWA) is categorised as “Australian University” under the current Provider Category Standards. The University’s comments are focussed on the changes to the Provider Categories. Nonetheless, UWA supports the other legislative changes, especially:

- Allowing TEQSA to extend the period of a provider’s registration or course accreditation; and
- Protecting the use the term “University” in Australian internet domain names.

UWA would like to make specific comments on the research threshold benchmarks proposed in the new Australian University category.

***Changes to the Provider Categories***

Overall, UWA supports the reduction of the current six categories to four and the merger of the current Australian University and the Australian University of Specialisation categories into the new “Australian University” category. The University agrees with the need to simplify and clarify current criteria as the underlying reasons for the changes. The use of term “University” does conjure an expectation of learned enquiry and world standard research.

The key changes of the new Australian University Category that are relevant to the University of Western Australia are:

- a) Demonstrate a mature level of development and a track record of compliance against category criteria.
- b) Clarification of scholarship and quality assurance such as the inclusion of five years of successful delivery of courses supported by evidence of strong student outcomes across different cohorts.

- c) Addition of civic leadership and industry engagement in higher education, particularly for work integrated learning and research partnerships.
- d) Demonstrate systematic support for scholarship and scholarly activities and outcomes that inform teaching, learning, and professional practice and make a contribution to the advancement and/or dissemination of knowledge.
- e) Increase in both the quality and quantity of research activity and the expectation that research leads to creation of new knowledge. For example, delivery of doctoral degrees (research) in at least three or at least 50% of the broad fields of education where courses are delivered whichever is greater. Additionally, the new criterion includes research quality requirements and uses the term “world standard research” in at least three or at least 30% of the broad fields of education where courses are delivered, whichever is greater. The quality requirement would increase to at least 50% of the broad fields of education where courses are delivered by 2030. The measurement of research quality is proposed to be via a variety of methods including use of ERA, benchmarking, peer review and citation analysis.

### ***Commentary on Research Threshold Benchmarks***

UWA is supportive of the changes noted in (a) to (d). UWA already has a long history of achieving these requirements. Nonetheless, it supports the conclusion regarding scholarship in the final report of the Review of the Higher Education Provider Category Standards that:

*“TEQSA acknowledges that scholarship may take many different forms within and amongst different providers. Therefore, TEQSA will continue to work with providers to ensure scholarship activities are to the standard expected of them within their categories and contexts.”*

UWA agrees with the need to provide a more articulate, and arguably more nuanced approach to assessing the extent, nature and quality of research to maintain its standing as an Australian University. Moreover, the final report proposes that research output that is of a world standard is across at least half of its operations as measured by broad fields of education / fields of research. However, the University does have concerns regarding the establishment of threshold benchmarks for quantity and quality of research.

First, a range of indicators have been suggested but the report states that the measures to be used by TEQSA are those that it deems acceptable. While the final report makes suggestions, it does not clearly determine which will be used and the reasons for their relevance or appropriateness.

Second, there is not any distinction or clarification regarding the types of research that would be applicable in terms of their inclusion into the measurement of research.

An agreed sector wide measurement model will be critical to ensure there is fair and transparent assessment of research effort.



In light of the final report's proposal for greater transparency regarding the categories, TEQSA should engage and consult with the sector to agree on:

- What constitutes appropriate scholarship and scholarly activity that impacts on the requirements of criteria within categories;
- Range of applicable research including those arising from PhD programs and institutional partnerships to be included in the quantity of research; and
- The quality indicators, their relevance, the source and use of the underlying data and the analysis method that would be used.

The Government's response to the establishment of research output thresholds also supports this position, when it stated that:

"The Government will consider the advice from the HESP and discuss approaches with...the sector before settling the implementation and transition arrangements..."

Should you have any questions regarding our comments or require further information, please contact Professor Graham Brown, Pro Vice Chancellor Academic.

Yours sincerely

**Professor David Sadler**  
**Deputy Vice-Chancellor (Education)**

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