

Submission to the Senate Standing Committees on Education and Employment inquiry into the quality of governance at Australian higher education providers

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I welcome the Senate's decision to re-open this inquiry and am grateful for the opportunity to make this submission. I am a lecturer in anthropology at the Australian National University with research expertise in the culture and practices of scientists, scientific institutions, and universities. I have published extensive research on institutional governance, quantitative evaluation methods, and performance evaluation systems in scientific research institutes and universities. This includes research assessing the impact of quantitative evaluation systems on professional staff, academic staff and research quality.² My current research focuses on the impact of external consultant advice on the functioning of universities. I pay particular attention to Nous Group and its proprietary UniForum system, which universities use to assess the "efficiency and effectiveness of operations, services, and teaching."³

I share preliminary findings from this ongoing research as they relate to point 1(d) of this inquiry's terms of reference:

"The impact of ... the use of external consultants, on staff, students and the quality of higher education offered" at Australian higher education providers.

My findings focus on the Australian National University as this has been my primary case study thus far. The issues raised by this case study are nevertheless significant to universities across Australia.

In **Summary**, I argue that:

1. **External consultants are being empowered to define the future of Australian universities** — restructuring decisions are driven by opaque, proprietary metrics rather than public interest or academic values.
2. **UniForum's underlying data and methodology are deeply flawed** — the resulting benchmarking is poor quality, opaque, and prone to creating perverse incentives.
3. **Nous Group ownership of UniForum undermines the independence of its benchmarking** — Nous sells both the benchmark (UniForum) and the "solutions" to fix poor results.
4. **Nous Group's work generates concerning conflicts of interest** — these conflicts potentially impact Nous Group's work for universities and the Department of Education.
5. **Transparency and accountability are absent** — advice from external consultants, including the underlying data and methodologies they rely on, should be open to public scrutiny.

UniForum Benchmarking and External Consultants in Australian Universities

Context 1: Consultancy services in Australian public agencies

The reliance on consultancies in Australian universities mirrors broad concerns about the extensive use of consultancies by the Australian Government and public agencies. The Senate has already acted as an important mechanism for bringing scrutiny and transparency to this topic.

In the Senate inquiry into management and assurance of integrity by consulting services, the Senate found numerous troubling instances of government-contracted consultancy services operating against the public interest. This included helping reveal that Price Waterhouse Cooper were misusing confidential government information to gain commercial advantage for its clients.

As described in section 2.c of this submission, risks for similar misuse of information are likewise present in the university sector. Despite this, many of the safeguards discussed and recommended by that Senate inquiry – for example, the publication of descriptions of consultancy contracts on AusTender – apply only to government departments and the APS, and not to public universities.

Context 2: Use of external consultants and UniForum by Australian universities

In 2023, consultants charged Australian public universities over \$410 million for their services.⁴ A significant portion of this consultancy work was tied to a data and analytics service owned by Nous Group, called ‘UniForum.’

UniForum is a “benchmarking service” that Nous provides to universities globally. It operates on a membership system through which more than 60 universities across the world share their data with Nous and one another. At least thirteen Australian universities are currently UniForum members.⁵ It is important to note that neither the amount Nous charges universities for UniForum membership, nor the underlying UniForum data and methodology are in the public domain.

University executives frequently use UniForum to justify structural changes and redundancies; as a basis for designing radical restructuring processes; and for evaluating their successes. At the Australian National University (ANU), for example, the university executive have made UniForum data a cornerstone of Renew ANU. In September 2024, Vice Chancellor Genevieve Bell provided a report to ANU Council setting out the rationale for “urgent structural change” – change that was subsequently branded “Renew ANU.” At the very beginning of this report, under the heading “Summary of Issues”, the Vice Chancellor stated:

“The international UniForum data benchmarks the efficiency and effectiveness of university professional and administrative support services over time and enables meaningful comparisons between universities of different scales and research intensities. It is the accepted benchmark for the sector. The UniForum data shows that ANU is lowest on the benchmark in terms of overall effectiveness and normalised cost for all services (see Figure 5). Put another way, the ANU is the most inefficient, ineffective and expensive professional service environment in Australia. This external benchmarking makes clear the opportunity to fundamentally streamline and improve our approach to service delivery.”⁶

OVERALL EFFECTIVENESS SCORE VS. NORMALISED COST - PARTS 1 & 2 SERVICES

Net Satisfaction (-100 to +100), Parts 1 & 2 Services, 2017 - 2023

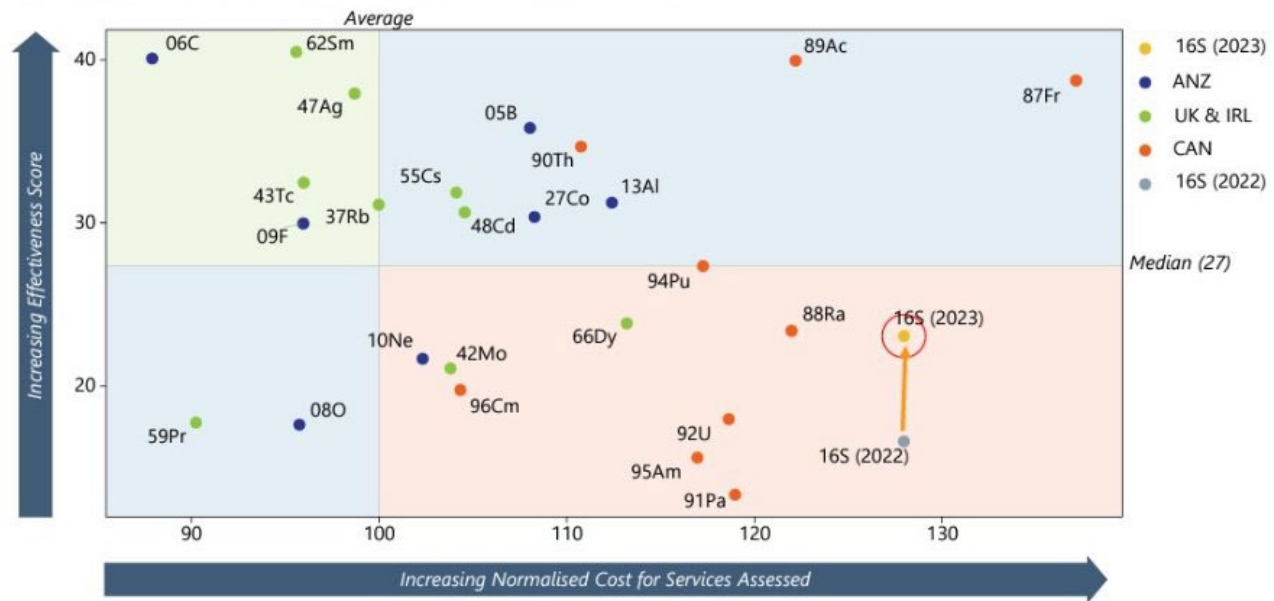


Figure 5. UniForum data, 2017-2023. ANU (16S) is circled in red.⁷

While the focus of UniForum data is often described as “support services,”⁸ its scope in fact extends to the heart of universities’ core teaching and research functions. The “service activities” assessed by UniForum data include, for example: “research integrity and ethics,” “research commercialisation,” “course development,” “student discipline,” “PGR student progress,” “academic program material,” and “teaching capability enhancement.”⁹ Many of these “services activities” are more than mere “support,” they are central to teaching and research. Likewise, while UniForum focuses on professional staff roles, it is important to note that crucial aspects of these “service” activities are often also performed by academic staff.

Given the weight university executives and governing bodies place on UniForum data, there is a strong case for greater public scrutiny of both the system and the consultancy advice tied to it. My research highlights particular need for concern in relation to:

1. The quality and validity of UniForum’s data and analysis
2. The role of UniForum within Nous Group’s wider consultancy business

1. The quality and validity of UniForum's data and analysis

Universities and Nous Group present UniForum data in a way that gives it the appearance of objectivity and scientific rigour. This is not only in the case of presentations to Governing Councils, but also in presentations to staff. My research, however, illuminates four interrelated concerns about UniForum data and its use by Australian universities:

- a. The poor quality of data and methodology
- b. Selective and inconsistent data analysis
- c. The opacity of data and methodology
- d. UniForum's potential to create perverse incentives

a. Poor quality data and methodology

For much of its data, UniForum relies upon a standardized global survey. These surveys ask university staff to: numerically score their satisfaction with specified services; and for staff or their supervisors to self-report time spent on specified service activities. The same questions are used across more than 60 universities worldwide. At this scale and across such diverse contexts, surveys inevitably face well-known problems.

Such problems include the fact that a set of questions tailored for one context does not necessarily translate to another. For example, the same questions about "research integrity and ethics" or "research commercialisation" services may be interpreted in one way by staff in a social science-dominant Australian university, but in a different way by counterparts in a STEM-dominant Canadian university. Indeed, there is anecdotal evidence that UniForum survey respondents encounter survey questions irrelevant to their context but are nevertheless encouraged to answer anyway. Given that most staff are free to choose not to respond to the UniForum satisfaction survey, there are further related concerns about low response rates and associated response bias.

These are well-documented weakness of this kind of survey research and yet it is unclear how, if at all, UniForum mitigates against them. Since publicly available data on UniForum's methods is extremely limited, these are issues I will be investigating further through extensive interviews with university staff at UniForum member universities.

As well as being generated through questionable survey methods, UniForum data is rendered yet more problematic by how it is analysed and used. Take, for example, the above quoted analysis that ANU's Vice Chancellor presented to ANU Council in *Figure 5*.¹⁰ This analysis makes two steps that are, from a social science perspective, extremely problematic:

- i. It aggregates all services within each single university under a single overall effectiveness score and a single overall cost score.
- ii. It treats the aggregated overall scores for each university as directly comparable.

In relation to this first point, it is important to note that Uniforum divides "services" into 70 diverse categories spanning teaching, research, infrastructure and administrative functions. They include, for example: "research integrity and ethics," "IT help desk," "research commercialisation," "course development," "travel administration," and "PGR student progress."¹¹ Even if reliable effectiveness data existed for each category (a big assumption), it is difficult to see the analytic value of collapsing them into a single aggregate score. The scope of services is simply too broad for an "overall" score to tell you anything meaningful about how a university functions.

In the second step, the problem is the enormous diversity of universities that are being compared in *Figure 5*. Even within Australia, universities have very different portfolios and structures. Some emphasise teaching over research, some have broader or narrower disciplinary focus, and they each serve different student, public, and industry constituencies. In this context, like-for-like comparisons are not plausible — different universities are, by design, not like-for-like institutions.

In a “UniForum explainer” video shared with staff as part of Renew ANU, the university executive claim that “normalization in the [UniForum] model allows universities in the dataset to be compared validly to one another.”¹² It is far from evident, however, what specific method of “normalization” UniForum is using, or how it could “validly” support the kind of comparisons ANU’s executive are using it to make.

This is not to say that lessons cannot be learned from comparing how universities pursue similar goals and activities. Credible, sophisticated comparative analysis can be valuable. Such comparison, however, cannot be achieved through crude or overly simplified quantitative scores. In this regard, I would question Vice Chancellor Bell’s claim that UniForum “enables meaningful comparisons between universities of different scales and research intensities.”¹³ There is very little evidence of credibility or sophistication in UniForum’s data or analysis. This is especially true of the headline overall effectiveness and cost scores that were presented to ANU Council as *Figure 5* in September 2024.

b. Selective and inconsistent data analysis

The scatter plot presented to ANU Council as *Figure 5* shows only 26 of the more than 60 universities included in UniForum’s full dataset.¹⁴ The presentation of a certain subset of data is not itself problematic. It might, for example, be appropriate to compare only universities with certain shared characteristics (though this would contradict the ANU executive’s claim that UniForum allows for comparison across all universities within the dataset). Where a subset of data is presented, however, one would expect to find a rationale or explanation for selection of that subset. This is not the case in the ANU executive’s presentations of UniForum data to Council or to staff.

ANU executive appear, furthermore, to have selected different data subsets to share with Council compared to staff. On page 11 of this submission, I have appended copies of two graphs side-by-side.¹⁵ One is the above-mentioned scatter plot presented to ANU council as *Figure 5*. The second is a superficially similar scatter plot presented to ANU staff via a video explainer. Each purport to show the same comparison: UniForum effectiveness score vs. UniForum cost score for 2017-2023. The graphs, however, include and exclude different comparison universities, resulting in significantly different representations of ANU’s relative performance.

Between the same two graphs, there is also a notable difference between ANU’s scores for 2022 and 2023. In one graph, ANU’s UniForum effectiveness score increases from 2022 to 2023, in the other it decreases. Likewise, the comparison universities that appear in both graphs perform markedly better in one graph compared to the other (see e.g. 91Pa, 92U and 55Cs). It is unclear what the cause of this discrepancy is, but a plausible explanation is that a different methodology has been used to aggregate ‘overall’ effectiveness and cost scores in one graph versus the other. This variation further underlines the need for transparency about how and why particular methodologies are being used to process and analyse UniForum data.

As well as asking why particular decisions are being made, it is important also to ask who is making those decisions. In this respect, it is unclear whether the scatter plots presented to ANU Council and ANU staff were produced by the ANU executive, or whether they were produced by Nous. That is to say, ANU executive may be presenting their own analysis of the raw UniForum data, but it is also very possible they are relying on a pre-packaged results provided by Nous. It would be extremely concerning if university executives are relying only on prepackaged data analysis and not performing their own independent scrutiny of the underlying data and methodology.

c. Lack of transparency

As described above, my preliminary analysis reveals significant concerns about the quality and reliability of the UniForum data and analysis that Nous provides to Australian universities. Deeper and more detailed scrutiny of their methods would nevertheless be valuable for identifying specific biases and errors built into UniForum data. Such scrutiny is, however, impossible because none of Nous' surveys, datasets or analytic models are in the public domain.

A significant body of academic work has raised concerns about the over-reliance – in universities and elsewhere – on quantitative metrics and scores.¹⁶ What makes UniForum exceptional, however, is that universities are internalizing a benchmarking methodology that is not only privately owned but deliberately kept from public view. Indeed, the Australian National University has recently rejected Freedom of Information requests to access documents detailing, among other things, the UniForum survey methodology used at ANU as part of Renew ANU, and the response rates to those surveys.¹⁷ In its response to this FOI, ANU's Senior Information Governance and Access Officer determined that it was inappropriate to publish UniForum's survey methodology because doing so would involve, "disclosing trade secrets or commercially valuable information."¹⁸ This lack of transparency undermines confidence in the data and raises serious questions about its use in decisions that fundamentally shape the futures of public universities.

d. Goodhart's law and perverse incentives

A widely observed problem with the use of evaluation metrics in universities is that once institutionalized the measures tend very quickly to be treated as targets. In this context, scholars of university governance often cite Goodhart's law: "When a measure becomes a target, it ceases to be a good measure."¹⁹ The core problem is that once a metric becomes the gold standard, people focus on raising the score rather than improving actual performance, often distorting outcomes in the process. Indeed, this is a key aspect of why ranking and evaluation systems like the UK's REF (Research Excellence Framework) and the QS (Quacquarelli Symonds) rankings have been so damaging: universities have dedicated their resources to improving their scores and ranking, rather than actually improving what they do.²⁰

In this context, staff have a significant interest in inflating UniForum scores. Indeed, at one UK university, a staff union ran a concerted campaign to encourage staff to respond to UniForum service satisfaction surveys in a particular way.²¹ The goal of this union initiative was to boost UniForum service effectiveness scores, and therefore guard against that data being used to justify redundancies. A side effect, however, was to distort the survey data. Even if this is not happening in Australian universities (though it may well be), it is important to note that UniForum benchmarks Australian universities against peers in the UK.

Senior university managers and the consultants they hire are also incentivized to treat UniForum scores as ends in themselves. For both of these actors, improved UniForum scores may be taken as evidence of good performance.

In this respect, UniForum data may create a perverse incentive for managers and consultants to shift work from professional staff to academic staff. A key method through which UniForum assesses “service cost” is surveys of professional staff who are asked to log their work hours to a UniForum service code. For many of the services that UniForum surveys there is significant overlap between academic and professional staff roles. Certain tasks related to administration, research ethics or students support, for instance, would be fulfilled by academic staff in one university but by professional staff in another. Despite this, it seems to be only professional staff, and not academic staff, who are asked to log their hours against UniForum service categories. This implies that academic staff hours spent on things like administration or student support are not captured by UniForum’s service cost data. A consequence of this would be that any shifting of work from professional staff to academic staff would result in an improved UniForum cost score.

To give a concrete example, ANU has recently closed consultation on a proposed restructure to its Academic Portfolio.²² This change proposal involves a significant reduction in professional staff, and it implies a significant shifting of administrative and student support services from professional to academic staff. The Head of ANU’s School of Politics and International Relations Prof. Nicholas Biddle has highlighted that this proposed change would leave academic staff with even larger “‘hidden’ administrative load, undermining teaching quality and student outcomes.”²³ This workload shifting would represent a significant cost increase. Administrative work once done by lower paid (and likely more efficient and effective) professional staff would be passed over to more highly paid academic staff. Nevertheless, because the salary cost of that *hidden* administrative work is not captured by UniForum, its data might falsely represent ANU’s proposed restructure of its Academic Portfolio as a cost reduction.

The shifting of administrative and other work from professional to academic staff has been a feature of many recent restructuring activities in Australian universities.²⁴ I do not yet have sufficient data to determine whether rising administrative workloads for academics are directly linked to universities’ reliance on UniForum. In other words, there is not yet evidence that managers or their advisers at Nous Group are actively gaming the data. There is evidence, however, that UniForum creates incentives for damaging practices such as workload shifting. That such incentives are potentially baked into UniForum is significant reason for concern.

2. The role of UniForum within Nous Group's wider consultancy business

Nous Group has charged Australian universities millions of dollars for consultancy services. Recent customers include Monash University (who paid them \$5.5 million from 2016 to 2021), University of Sydney, and ANU (where they have ongoing contracts for over \$3 million). A core part of Nous' offering is planning and implementation work to restructure universities. In 2021, Nous Group acquired UniForum, and they continue to operate the UniForum benchmarking service in tandem with wider consultancy services. My research on Nous' practices in relation to and beyond UniForum raises four key concerns:

- a. UniForum's lack of independence
- b. UniForum's role in driving a singular model of the university
- c. Nous' handling of confidential information
- d. Potential conflict of interest in Nous' work on University Accords

a. UniForum's lack of independence

As ANU's Vice Chancellor has highlighted, UniForum has come to serve as "the accepted benchmark for the [university] sector."²⁵ In this respect, UniForum has taken on a role similar to public and private university rankings systems such as the UK's REF and the QS World Rankings. What distinguishes UniForum, however, is that it is now owned by a company – Nous Group – who simultaneously offers consultancy services that promise to address poor UniForum rankings. Essentially, one wing of Nous Group provides UniForum analysis that often makes 'the case for change,' then a second wing of the same company swoops in to offer solutions: to design and deliver that change.

If UniForum is – as Nous and its clients imply it is – meant to be an independent benchmark of university services, that claim is undermined by its ownership by a consultancy whose business depends on universities seeking its advice.

b. UniForum and cookie-cutter restructures

Numerous academics and observers have highlighted concerns that when invited to advise on university restructures, external consultancy firms like Nous Group seem to consistently propose remarkably similar approaches and solutions.²⁶ The focus of these restructures are not only staff and course cuts but changes in university governance and management, including: the growth of management-level positions; the reduction of junior-ranked professional staff; the centralization of administration; administrative automation; and increased administrative workloads for remaining staff. Recent research provides evidence these cookie-cutter organizational characteristics may in fact hinder rather than improve both performance and efficiency in universities.²⁷

If restructures are built on UniForum, then its blind spots may be hardwiring a flawed, one-size-fits-all model of governance across the sector — a model that undermines educational quality and institutional diversity.

c. Handling of confidential information

Nous Group provides consulting services to multiple universities across Australia and the world, as well as to the Australian Department of Education. These universities position themselves as

competitors for students and public funding,²⁸ while the Department of Education is ultimately responsible for regulating and funding Australian universities. In its dealings with one university client Nous Group will likely handle confidential information about that university that other domestic and international university clients would benefit from accessing. This is likewise the case for confidential government information Nous Group might access in its works for the Department of Education.

In January 2024, for example, ANU approached Nous Group to conduct “strategic research analysis of the Australian HE [Higher Education] Sector generally and some key competitors specifically.”²⁹ In such a context, it would clearly be advantageous for Nous Group to draw upon its prior work for those competitor universities. In response to a Freedom of Information request to access the research that Nous produced, ANU shared a 22-page Nous report in which every single substantive page was fully redacted and marked with a note: “Documents disclosing trade secrets or commercially valuable information.”³⁰ It is unclear how Nous could have been giving ANU information about other Australian public universities that is both confidential and commercially valuable.

To clarify, I am not suggesting that I have evidence of wrongdoing by Nous or its clients. I wish simply to note the need for Nous Group to have appropriate safeguards in place, as well as the interest of the Australian public in those safeguards being rigorous and subject to external scrutiny.

d. Potential conflict of interest in Nous Group’s work on University Accords

In 2023, Nous Group completed several contracts for the Department of Education as part of the development of the University Accords. This work created a potential conflict of interest not only because Nous Group earns a significant proportion of its income from universities, but also because the role of external consultants like Nous in university governance was itself a topic of discussion in the development of the Accords.

In their public submissions in response to the Discussion Paper on The Australian Universities Accord, both Public Universities Australia and the Independent Scholars Association of Australia (ISAA) raised concerns about the role of consultants in universities. These included: their lack of competence, their ideology, and their conflicts of interest.³¹ The Department of Education employed Nous Group to analyse these public submissions on its behalf. Nowhere in its 80-page, government-commissioned “submission analysis”, does Nous Group mention external consultants.³² Given Nous’ apparent conflict of interest, this omission is extremely concerning.

Conclusion

Over the past decade, Nous Group's UniForum data has quietly taken on the status of authoritative benchmark for the quality of a range of professional and academic services performed by public universities in Australia and across the world. This authoritative status is performed through scientific-looking graphs and scientific-sounding jargon designed to imply UniForum data is generated through rigorous methods and backed by expert consensus. This performance of authority is significant: it lends UniForum data an air of credibility and facticity that makes acting upon its results irresistible.

When one begins to open the black box and examine how UniForum data is actually produced, however, it becomes difficult to justify the degree to which Australian university executives are relying upon it in their decision-making. My analysis is based on a review of publicly available documents, and it is therefore possible that Nous or its clients would point to things not in the public domain that address some of the conceptual and methodological flaws that I have highlighted in UniForum. But the fact that the underlying UniForum data and methodology is not in the public domain is itself one of the key causes for concerns. When the stakes are so high, it cannot be acceptable for Nous Group and its clients to simply tell university staff and governing councils, 'trust us, these numbers are based on rigorous methods and analysis.' The lack of rigor, external scrutiny, and transparency in UniForum's underlying data and methodology would be a cause for concern in any public institution, but it is especially concerning in the context of universities where rigorous, transparent, and accountable knowledge production is a core part of what we do.

The picture becomes even more concerning when one considers the position of UniForum within Nous Group's broader university consulting business model. Not only is the key methodology for benchmarking universities privatized and black-boxed, the UniForum data and methodology are now owned and operated by a firm – Nous Group – who also make a multi-million-dollar business of selling advice to Australian universities, as well as to the Department of Education.

Recommendations

The extensive reliance of university executives upon UniForum, as well as upon advice from external consultants more broadly, is itself a symptom of much wider problems in university governance. Put simply, where universities have competent leaders and are governed through robust structures, one would not expect to find them relying on UniForum data or external consults to the extent that we see at many Australian universities. The wider problems of which reliance on external benchmarking and consultancy services are a symptom, include: senior executives lacking the appropriate skills, character, and expertise to run universities; excessive emphasis on cost-cutting; and toxic workplace cultures that are inconducive to upward feedback or collaborative governance.

Noting that proposals for wider reform to university governance are necessary but beyond the scope of this submission, there are several measures that could be taken to address and to guard against potentially damaging use of UniForum data and external consultants within the current university governance regime:

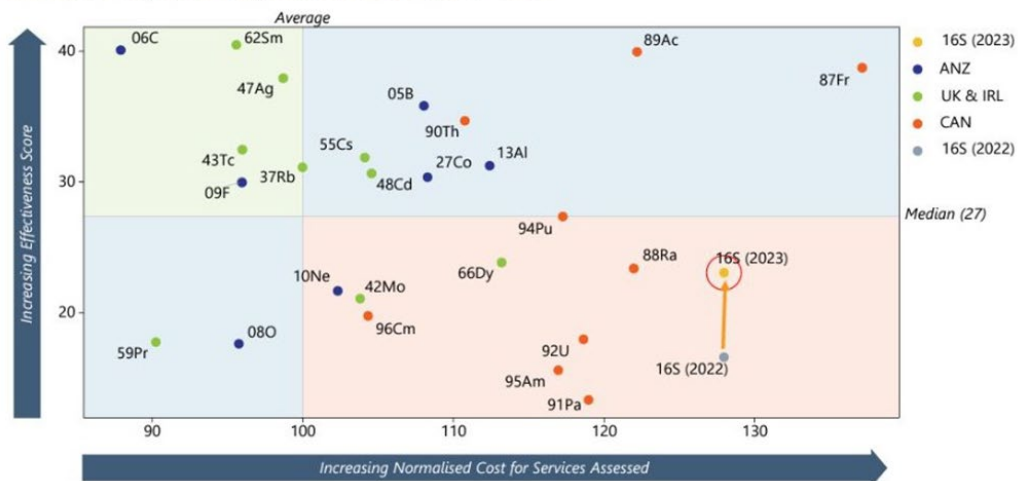
- Require universities to publicly disclose a meaningful description of all contracts made with external consults.
- Where universities rely on data or benchmarks provided by external consultants to guide redundancies or restructures, require them to publish the underlying data and methodology.
- Limit the ability of public universities to use ‘trade secrets’ or ‘commercially valuable information’ exemptions to block freedom of information requests for documents provided by external consulting and benchmarking services.
- Develop strong and independent regulation of consultancy and benchmarking firms that provide services to public universities.

Appendix 1. Comparison of two UniForum graphs

UniForum data presented to ANU Council by the Vice Chancellor³³

OVERALL EFFECTIVENESS SCORE VS. NORMALISED COST - PARTS 1 & 2 SERVICES

Net Satisfaction (-100 to +100), Parts 1 & 2 Services, 2017 - 2023



UniForum data shared with ANU staff in explainer video³⁴

OVERALL EFFECTIVENESS SCORE VS. NORMALISED COST - PARTS 1 & 2 SERVICES

Net Satisfaction (-100 to +100), Parts 1 & 2 Services, 2017 - 2023



Notes and References

¹ I am extremely grateful to several colleagues who provided invaluable advice and feedback on this submission. My thanks especially to V. Chitra.

² Timothy McLellan, “Impact, Theory of Change, and the Horizons of Scientific Practice,” *Social Studies of Science* 51, no. 1 (2021): 100–120, <https://doi.org/10.1177/0306312720950830>; Timothy McLellan, “Tools for an Efficient Witness: Deskillling Science and Devaluing Labor at an Agro-Environmental Research Institute,” *HAU: Journal of Ethnographic Theory* 11, no. 2 (2021): 537–50, <https://doi.org/10.1086/716421>; Timothy McLellan, “Bureaucracy and Distributed Vulnerability at a Chinese Research Institute: Beyond the Faculty Perspective on Audit Cultures,” *Journal of the Royal Anthropological Institute*, July 13, 2023, 1467-9655.13995, <https://doi.org/10.1111/1467-9655.13995>; Timothy G. McLellan, *Science Interrupted: Rethinking Research Practice with Bureaucracy, Agroforestry, and Ethnography* (Cornell University Press, 2024); Timothy McLellan and Ben Eyre, “Rethinking Rigor, Knowledge Hierarchies, and Deskillled Data Collectors: An Agenda for Skilling Research in Global Development,” *Outlook on Agriculture* 54, no. 2 (2025): 190–97, <https://doi.org/10.1177/00307270251337111>.

³ Nous Group, “UniForum | Nous Data Insights,” accessed September 4, 2025, <https://nousdatainsights.com/our-solutions/uniform>.

⁴ Joshua Black, *Elective Spending at Australian Universities* (The Australia Institute, 2025), <https://australiainstitute.org.au/report/elective-spending-at-australian-universities/>.

⁵ The UniForum website states that they have over 60 members worldwide. Of those 60, they list 39 university members including 12 Australian universities. The Australian universities listed are: University of Sydney, University of Canberra, University of Adelaide, University of Wollongong, Monash University, Macquarie University, University of South Australia, Griffith University, James Cook University, RMIT, University of Queensland, La Trobe University. (Nous Group, “UniForum | Nous Data Insights.”) In addition to those twelve, at least ANU are also a member.

⁶ ANU Vice Chancellor, “Permanent Cost Base Reduction Plans: Q4, 2024,” Published in response to ANU FOI request #202500018, September 23, 2024, 5, <https://d1zkbgwd2iyy9p.cloudfront.net/files/2025-05/202500018%20-%20Documents%20Released.pdf>.

⁷ ANU Vice Chancellor, “Permanent Cost Base Reduction Plans: Q4, 2024,” 5.

⁸ In addition to the above quoted statement to ANU Council, on 7 November 2024, ANU’s Vice Chancellor told a Senate Estimates hearing that Nous Group’s work for ANU was focused on “service infrastructure and support services.” (Hansard. *Senate Education and Employment Legislation Committee Estimates*. 07/11/2024 https://parlinfo.aph.gov.au/parlInfo/download/committees/estimate/28536/toc_pdf/Education%20and%20Employment%20Legislation%20Committee_2024_11_07_Official.pdf;fileType=application%2Fpdf#search=%22committees/estimate/28536/0000%22).

⁹ Nous Group, “UniForum University Service Effectiveness Assessment,” accessed August 29, 2025, <https://nousdatainsights.com/our-solutions/uniform/service-effectiveness-assessment>.

¹⁰ See above pp. 2-3.

¹¹ Nous Group, “UniForum University Service Effectiveness Assessment.”

¹² Australian National University, “Renew ANU UniForum Explainer,” June 4, 2025, <https://vimeo.com/1090331993/e47398e187>.

¹³ ANU Vice Chancellor, “Permanent Cost Base Reduction Plans: Q4, 2024,” 5.

¹⁴ See above at pp. 2-3.

¹⁵ I am indebted to an anonymous ANU staff member who brought to light the discrepancy between these two graphs.

¹⁶ Vincanne Adams, ed., *Metrics: What Counts in Global Health* (Duke University Press, 2016); Mario Biagioli and Alexandra Lippman, eds., *Gaming the Metrics: Misconduct and Manipulation in Academic Research* (MIT Press, 2020); Kevin E. Davis, Benedict Kingsbury, and Sally Engle Merry, “Indicators as a Technology of Global Governance,” *Law & Society Review* 46, no. 1 (2012): 71–104, <https://doi.org/10.1111/j.1540-5893.2012.00473.x>; Marilyn Strathern, ed., *Audit Cultures: Anthropological Studies in Accountability, Ethics, and the Academy* (Routledge, 2000).

¹⁷ Following pressure from the Commonwealth Senate, ANU made some of this information available to ANU staff via the ANU Data Hub on 27 August 2025. As an ANU staff member, I can view those documents. Because these documents are marked “commercial-in-confidence,” I have not referenced, quoted or otherwise relied upon those documents in this submission.

¹⁸ ANU FOI#202500067 Notification of decision. https://www.righttoknow.org.au/request/13092/response/42593/attach/3/202500067%20Decision%20Notice%20Final.docx.pdf?cookie_passthrough=1

¹⁹ Marilyn Strathern, “From Improvement to Enhancement: An Anthropological Comment on the Audit Culture,” *Cambridge Anthropology* 19, no. 3 (1996): 4; see also Mario Biagioli and Alexandra Lippman, “Introduction: Metrics and the New Ecologies of Academic Misconduct,” in *Gaming the Metrics: Misconduct and Manipulation in Academic Research*, ed. Mario Biagioli and Alexandra Lippman (MIT Press, 2020); Cris Shore and Susan Wright, “Audit Culture

Revisited: Rankings, Ratings, and the Reassembling of Society,” *Current Anthropology* 56, no. 3 (2015): 421–44, <https://doi.org/10.1086/681534>.

²⁰ Biagioli and Lippman, *Gaming the Metrics*; Timothy McLellan, “Asian Tricks and Research Misconduct: From Orientalism and Occidentalism to Solidarity against Audit Cultures,” *East Asian Science, Technology and Society: An International Journal*, ahead of print, Routledge, 2025, <https://doi.org/10.1080/18752160.2025.2482324>; Michael Sauder and Wendy Nelson Espeland, “The Discipline of Rankings: Tight Coupling and Organizational Change,” *American Sociological Review* 74, no. 1 (2009): 63–82, <https://doi.org/10.1177/000312240907400104>.

²¹ University and College Union, “Proposed Template Response to the ‘Uniforum Service Effectiveness Survey,’” accessed September 1, 2025, <https://www.ucl.ac.uk/ucu/news/2018/nov/proposed-template-response-uniforum-service-effectiveness-survey>.

²² Australian National University, “Academic Portfolio Organisational Change Proposal,” July 31, 2025, https://d1zkbwgd2iyy9p.cloudfront.net/files/2025-09/DVCA%20Change%20Proposal_Final%2001.09.2025.pdf.

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²⁸ One could certainly question whether it is healthy for Australian universities to view each other as competitors, but that question is beyond the scope of this submission. Here it is significant to note simply that these universities do in practice treat each other as competitors.

²⁹ ANU FOI #202500022, pt. 1, p. 4. <https://d1zkbwgd2iyy9p.cloudfront.net/files/2025-05/202500022%20-%20Documents%20Released%20Pt%201.pdf>

³⁰ ANU FOI #202500071 <https://d1zkbwgd2iyy9p.cloudfront.net/files/2025-06/202500071%20-%20Documents%20Released.pdf>; see also ANU FOI #202500072 <https://d1zkbwgd2iyy9p.cloudfront.net/files/2025-06/202500072%20-%20Documents%20Released.pdf>.

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