A submission to The Higher Education Review

for the Establishment of a Universities Accord

from the

Independent Scholars Association of Australia (ISAA)

April, 2023

The abbreviation DP for the Discussion Paper will be used in this submission.

The Independent Scholars Association of Australia Inc. (ISAA) was founded in 1995 as an Australian-wide association for the promotion of education and scholarship. The association has a diverse membership across the sciences, the humanities and the social sciences. ISAA has a broad purpose wih a knowledge and capacity for informed judgement and input on training, education and higher education matters.

*****

RESPONSE TO PART 1 OF THE DISCUSSION PAPER: the role of higher education in Australia's Future

1.3 The nature and purpose of Australian Higher Education

ISAA supports the statement in section 1.3: 'A priority for the Panel is to explore the fundamental role of higher education .... this includes how Australia's higher education providers .... underpin and contribute to the intellectual, cultural, community and economic development of the nation.' That recognises multiple roles for universities; however, note that those roles may conflict with each other. For example, economic values may conflict with intellectual values, basic research may have less immediate economic value than industry-directed research, and so on. We express our concern that there is a danger that the Accord in its final form will reflect a narrow view of higher education, inconsistent with the recognition in the DP on pages 6-7 of higher education's wider benefits and importance. An unfortunate aspect of the corporate culture in our universities is that many problems and issues within universities are neither openly discussed nor recognised, so that there is little pressure to try and resolve them. ISAA encourages the Panel to consider the use of language that takes account of the diverse roles of higher education mentioned in section 1.3.

*****

RESPONSE TO PART 2 OF THE DISCUSSION PAPER: Challenges and opportunities for Australia

Q1 How should an Accord be structured and focused to meet the challenges facing Australia's higher education system? What is needed to overcome limitations in the current approach to Australian higher education?

The question is very general and various aspects will be addressed. Ethical challenges are very much to be noted and are addressed in the response to Question 38.

The Accord. The Accord is presumably to be a type of agreement between the Government and universities that will embody obligations on the Government as well as upon universities. As well as considering the future, it should also focus on tackling existing problems, for otherwise those problems will carry over into the future. The Accord needs to be specific, and it should consider closely the effects and the details of practical implementation of its recommendations. It should be aware of the need to balance expectations with resources. Policy needs to be realistic about its aims and about what can be accomplished. The Accord needs to have careful and considered reasons for its recommendations and procedures.

Targets. Specifying targets is easy, and at worst can be merely arbitrary. Any targets in the Accord need to be considered in relation to what *specifically* needs to be done to achieve them and take account of the resources available. Also, a *rigorous* rationale for the desirability of a target is also needed.

Support the basic functions: teaching, scholarship and research. The DP recognises the constrained financial environment when it refers to 'current pressures on public funding' (Question 6, page 11). However, universities have spent millions of dollars on consultants, marketing, risk analysis and other activities that were probably intended primarily to improve their 'image' as businesses. Much of this expenditure has been questionable as far as actual benefits were concerned. What use was there of risk analyses when an epidemic struck? Or when the international student market was diminished? These were possibilities that had been previously identified as such without the need for consultants' reports.

The NSW Auditor-General has recently criticised the state government for '…effectively outsourcing … policy development to consultants. …Our review of a selection of consulting engagements from 10 NSW government agencies indicates that [they] do not procure and manage consultants effectively…We found that most agencies do not have a strategic approach to using consultants, or systems for managing or evaluating their performance.' The same almost certainly applies to universities. The names of consulting companies are publicised, but it is rare to hear of their findings. In any case, most consultants advise businesses and are not well-placed to advise in higher education where non-commercial values are very important for proper university management.

Figure 6 on page 27 shows that for 2021 there were about 60,000 professional staff and about 40,000 academic staff (research only, teaching and research, and teaching only) giving a ratio of about 40% for academic staff as a ratio of the total staff in the whole university system. (Note that the figures are based on the number of full-time or fractional full-time staff. It should be emphasised that if academic staff have a lower proportion of people on full-time appointments, and the figures were based on equivalent full-time staff, the 40% ratio could be even lower.) There has also been a proliferation of senior executive positions with up to nine or ten positions at the level of pro-vice chancellor or above in some institutions, a seeming purpose apparently being be project and market the university as being 'socially responsible', rather than as a university and academic necessity.

Also, the Panel further notes (p. 34) that an issue frequently raised has been funding for the full spectrum of university activities, many of which are not directly funded but are nonetheless essential to university operations. Concern on this issue is fully justified.

The above speak volumes about the priorities assigned to teaching, scholarship and research. Very substantial monies are directed to non-core activities, many of which are of questionable value in proportion. Universities need to have a sharp and critical look at restoring a proper balance between core and non-core activities. Change is required. The Accord should recognise funding realities and insist upon change.

Expectations should be proportional to resources. There is a tendency for more and more to be demanded of universities and their staff without recognition that this, in the absence of more resources, will have an impact on basic university activities. Universities themselves are part of this process, as more procedural demands are put upon staff without consideration of their effects. The same phenomenon has been widely recognised in schools, an effect of which is that many teachers have inadequate time to think and prepare for their actual teaching, with serious effects upon educational outcomes and causing teaching to be regarded as a low-level occupation. This is something Australia cannot afford, and it should be prevented in the nation's universities.

All universities should review their expectations upon staff with a view to giving greater and wider support to teaching, scholarship and research. This would include the balance between professional and academic staff noted above. As it is now, under the 'top down' non-academic management within universities, it is easy for managers to continually come up with more peripheral duties for academics, and this can be simply a way of maintaining a management role. Hence the 'onerous level of reporting' referred to in the DP (3.9.1, p. 34) applies within universities themselves. Peripheral marketing duties and other activities have an effect upon the quality of teaching, the opportunity to undertake research and scholarship, and to provide academic assistance to students. This requires specific action.

Research, infrastructure and people: the necessary priorities. There has been great pressure to support research projects which aim for tangible, short-term outcomes with commercial applications. This is fine as far as it goes, but it has revealed little comprehension of the variety of beneficial research and scholarship. The inordinate drive to support research projects whose main aim is to lead to commercialisation devalues the importance of basic research, which is the veritable life blood for all scientific research.

This also leads to the devaluing of research and scholarship in the humanities. A knowledge and appreciation of the humanities and social sciences is essential to informed public discussion and policy formulation, and is also critical in developing positive attitudes to lifelong learning and scholarly activities for the wider population.

There is a particular need for assistance to keep research assistants employed between grants. These dedicated (often young) scholars are generally forced to move on or are reduced to penury whilst waiting for another position. Their roles in research are often undervalued.

Universities use monies from international students to fund research. This raises problematic issues. One is that it detracts from supporting students who need greater language proficiency (not only international students), thus raising a serious issue of standards and quality. Many academics have to provide language support, respond continuously to student emails in their hundreds or even thousands, and that on top of other expectations (outside of teaching and research). These include university administration, counselling, marketing, community activities, providing reasonable assistance, considering requests for special consideration, reporting/negotiating on such requests, and arranging further exams for students who have missed assessment through illness or misadventure.

At the same time, universities need revenue to fund research apart from external grants (note that such grants generally take as given the necessary institutional support). Whatever one thinks of the various rankings of world universities (and there are serious issues with the superficiality of such rankings), they are very influential in supplying perceptions of quality and excellence of universities as a whole and pass as showing 'accountability' in however crude a way. As long as the rankings are perceived as so important, there will be a corresponding set of largely misplaced priorities.

Q4 Looking from now to 2030 and 2040, what major national challenges and opportunities should Australian higher education be focused on meeting?

ISAA has identified various challenges in response to various questions in this submission. However, although Australia has made great strides in the participation of women entering university there remains a challenge about fostering women's full participation and leadership in science, technology, research and development studies, and in university administration and research — ensuring that women have equal access to leadership training, career development, scholarships and fellowships.

Q7 How should the mix of providers evolve, considering the size and location of existing institutions and the future needs of communities?

There should be a mix of higher education institutions to allow for differing needs and communities. This includes TAFE, which should have systematic recognition and provision. However, the title of *University* should be safeguarded. If the term 'University' is not safeguarded, the wide world of knowledge will simply become a prisoner of local visions. Knowledge can be local, but it is also international and this is a vital aspect of universities and their contribution, not just to Australia, but to the world. A university must be open, and free to have serious discussion on issues relating both to wider society and its own internal policies and procedures. In more recent times, there have been serious episodes where the corporate values espoused by universities have conflicted with academic freedoms. Institutions which espouse a distinct set of beliefs that are not negotiable or not open for discussion should not be eligible to become universities, a principle recognised under current TEQSA criteria. Those criteria should be upheld. They currently show signs of being chipped away at the edges.

*****

RESPONSE TO PART 3 OF THE DISCUSSION PAPER: Challenges and opportunities for the higher education system

Q8 What reforms are needed to promote a quality learning environment and to ensure graduates are entering the labour market with the skills and knowledge they need?

There is no single answer to such a broad question. The word 'quality' is abstract and expresses an ideal, but to have explicit meaning, it must have a context. Despite this, loose language without context abounds in discussions of education policy. In the context of preparing a 'job-ready' graduate, for example, 'quality' may be conceived as the extent to which students remember certain useful information and develop specific skills suitable for immediate employment in a specific task. In earlier times, and except for the professions, this was taken to belong to technical and higher education (TAFE). In the context of a humanities graduate, however, 'quality' may be conceived as an extensive historical awareness, a capacity to think critically about philosophical and moral issues, issues of society, and an ability to express serious analysis and thought on these in words and writing.

More generally 'quality' could be taken to mean high intellectual standards, high international prestige in research, high quality of teaching, conformity to national and government objectives, or a high quality of support for students (such as language coaching, counselling and assistance students expect to receive from academic staff even when they are not directly academically related). Or does it mean all of these? If so, how can it be achieved in the different contexts? Different notions of 'quality' conflict with each other, so a question of priorities and resources arises that is hardly ever recognised, because extra demands are considered to be a so-called 'efficiency dividend' that can be automatically accommodated within existing staff time and resources. Typically, academic staff are expected (implicitly) to achieve higher quality and conformity to procedures through a higher workload, without regard to resources.

In fact, there is no necessary connection between a 'quality learning environment' and entering the labour market with presumed 'job ready' skills for a specific task. If universities are to be considered merely as 'job ready' training institutions they might as well be rebadged and called 'Government Job-training Institutes', or some such.

Q11 How should Australia boost demand from people to study in the higher education system?

The question appears to assume that no matter the proportion of students enrolled in higher education, it's an automatic good to increase it. That is a question that needs serious consideration. It's not enough to simply observe that some OECD counties have a higher participation rate. Note the observation in the DP (page 7): 'the target set by the Bradley Review of Australian Higher Education for 40% higher education attainment has been met.' However, not everyone is suited to a university education, and such people should be respected, both in their choice and in the essential contributions they make to society. This touches on the question of 'parity of esteem' in Section 3.3.1 of the DP. The question of 'parity of esteem' is a crucial one for policymakers in TAFE and VET, and these areas have received little esteem, interest or support from governments over a long period. This needs to be rectified. The question of 'parity of esteem' is also a wider social issue. However, having said all that, there may be a case for 'boosting' demand, but if so it should be to supply opportunities for those who can benefit, rather than just trying to get a higher number. An analysis of university success rates could help (a recent report from the Productivity Commission is most likely relevant here). Also, there remains a need to facilitate university entry for disadvantaged groups (see response to Question 30).

Q15 What changes are needed to grow a culture of learning in Australia?

A change in attitudes. Cultural attitudes in Australia would need to change so that education, learning, research, and scholarship are seen not as merely utilitarian and directed to immediate job opportunities, but as enriching and worthwhile activities in themselves with positive community and national benefits. It is difficult to see how this can occur or be encouraged within the priorities and thinking of current policy.

Especially for those people who already have a commitment to learning throughout their lives, even to the extent of conducting their own research and scholarship as members of ISAA do, universities should consider what they can do towards developing well informed citizens who can contribute constructively to decision making in Australia's democratic society.

Ethics approval for independent scholars and researchers. In Australia, research involving humans requires approval from an ethics committee recognised by the Australian Health Ethics Committee (AHEC). These committees are found and funded in universities, hospitals and other health-related institutions. This means that an independent scholar or researcher whose activity involves humans does not have automatic access to an ethics committee, and has to find a committee by their own initiative. However, committees have their own policies concerning the consideration of ethics applications, and may charge applicants for providing ethics approval. In some circumstances this could prevent a researcher without institutional support from carrying out the research. ISSA's view is that AHEC, in conjunction with universities and other institutions with ethics committees, should have researcher-friendly policies for those based outside AHEC-recognised institutions. Both AHEC and the universities have, or should have, an interest in facilitating serious research and scholarship more widely and this is a way they could contribute.

Q17 How should better alignment and connection across Australia's tertiary education system be achieved?

The question appears to assume that a stricter 'alignment' is desirable. Alignment, connection and similarity were objectives for higher education in the Dawkins conception of a 'unified national system' in 1988. This has been largely achieved, at least in terms of what our universities as a whole *aspire* to be — internationally recognised educational and research institutions. But alignment of universities militates against their diversity. So, are we aiming at alignment or diversity? Question 17 obscures the fact that choices must be made if we are to have diversity. Also, what is the conception of 'alignment'? It would seem that an imposed 'alignment' would be contrary to the market-based conception of universities as competitors that has prevailed for so long.

Q27 How can we improve research training in Australia including improving pathways for researchers to gain experience and develop high-impact careers in government and industry?

If researchers are to have 'high-impact' upon governments, then government attitudes need to move away from the continual politicisation of issues and decisions and look to knowledge and expertise from researchers to tackle policy issues. Since the 1980s governments have tended to ignore research and scholarship, and welcome them only to the extent that they are 'friendly' to their ideology. This is a shallow approach of political convenience. Instead, there should be an attitude directed to the needs of the nation as whole, consistently applied.

However, there are broader issues of great importance. The question appears to imply that the purpose of university research is to meet immediate needs of government and industry. This simply perpetuates the same narrow vision of research outputs and outcomes that we have seen in the Jobs-Ready Graduates scheme. Research in universities should be broadly based, and should not be seen simply as an activity to meet government and industry priorities. There is a general feeling given by the DP that it regards universities primarily as utilitarian training institutions, rather than scholarly and educational institutions in their fullest sense and in their intellectual diversity including the humanities and social sciences.

It is also important to keep in mind that research done outside of the academy also has impacts on society, for example the research carried out through non-government organisations, in some businesses and industry as well as in government departments. ISAA wishes to remind the Panel that not all researchers are part of university and related institutional structures. For their work to be effective, students need to have a solid education in the processes and practices of research, through explorations of its epistemological foundations. University research education should not be restricted to those on scholarships linked to grants, but should be available to those who meet the criteria of informed curiosity and a capacity for intellectual rigour. So-called 'research' that focuses only on the development and implementation of data collection instruments, without its embedding in the scholarly knowledge of the field, only provides a short term 'fix' that loses effectiveness in the longer term.

Q29 What changes in provider practices and offerings are necessary to ensure all potential students can succeed in their chosen area of study?

An impossible task. The question seems to assume that a stage can be reached when all potential students actually become students and not only succeed in getting their formal qualifications (presumably in minimum time) but in having a successful career as well. We can and should look to improvements, but not to Utopia. However, one could, and perhaps should, ask a corresponding question of the Australian schooling system, and ask what the Government is proposing to do there. See also the response to Question 30.

Q30 How can governments, institutions and employers assist students, widen opportunities and remove barriers to higher education?

Participation and removing barriers to higher education. The review panel is concerned that 'students are academically prepared and socially supported to undertake higher education' (p. 25). This would appear to refer to school education *prior* to university entry. At the same time universities are expected to maintain high quality courses and entry standards while also making up for the educational, emotional, and financial disadvantage some students have inherited from their previous education and experiences.

The intention that students are *academically prepared and socially supported to undertake higher education* emphasises that learning and education are whole-of-life processes. Consequently, barriers to participation in higher education are often the result, in part, of a long process, meaning that university education cannot be seen as separate from what has happened in schools and families. Removing participation barriers, or to alleviate them, requires the education system from primary school to higher education to be considered in its entirety, including TAFE and VET. The schools funding system in Australia is an engine for educational inequality for many of our young people. Governments have failed to implement the Gonski report that recommended funding be based on *actual* school and student needs, thereby acquiescing in the consequent continuing and increasing inequality.

Hence, universities cannot compensate for all the disadvantages a student might have suffered. Universities have contributed, and they can and should continue to contribute to alleviating this problem, but the issue is much wider. The basic point is that although universities can help, and should consider further what can be done, they should not be held responsible for the policies, public neglect and social deficiencies that have produced participation problems in the first place.

Education faculties in our universities should instruct future teachers on evidence-based methods for classroom management and for teaching reading, writing and numeracy. Reading, writing and numeracy are absolutely basic for preparing school students for higher education, and also for participating more fully in society. These basic skills are essential for the maintaining of a healthy democracy in Australia. Universities have done a very great deal to alleviate participation issues, especially over more recent years, but basic skills that are essential for university students cannot be created overnight.

A further point should be noted. While higher education has a very important role to play in providing access and learning opportunities for the successful participation of students with difficulties, including those with disabilities, those from migrant and refugee backgrounds, and Indigenous people, it also has a responsibility not to admit students unless there is a reasonable chance of those students succeeding. These conflicting obligations have not always been successfully handled.

Indigenous people. A particular issue is the extent of participation by Indigenous Australians. The above remarks apply, but special efforts need to be made in this direction, particularly for indigenous people in rural and remote areas. It would be useful if there was a way of early identification of potential students in their communities and providing support over an extended period. This seemingly needs to go further than the pathways programs for Indigenous students currently offered by some universities, and could encourage more potential Indigenous students. While universities might be able to take action in this regard, it would appear to be primarily a task for the school education authorities. Also, universities should facilitate their Indigenous students' involvement in the areas of innovation and technological change, access to internet and digital services, financial services, the transmission of traditional, scientific and technical knowledge, languages, and spiritual and religious traditions and practices, including through digital technologies.

ISAA considers that independent scholars have a role to play in increasing scholarship and research that creates a greater awareness of Indigenous knowledge and culture, as this often lies outside governments' priorities but contributes to an environment where Indigenous participation in higher education is facilitated.

Issues involving TAFE. The question of universities recognising prior knowledge, especially from TAFE has been around for a long time. It used to be called 'articulation'. It is worth noting that large areas of university study have dropped having their complex systems of prerequisites for their degrees, so it is rather surprising that there has not been more progress on this issue. As well, universities reportedly are admitting a greater proportion of students based not upon their ATAR, but on other forms of recognition. There are pathways programs for potential TAFE students that students find very supportive, but TAFE needs to be better resourced for all its programs.

Financial issues for students. ISAA notes the recent rise in the cost of living and expresses its concern at the difficulties this is creating for a substantial number of students. Many students take on jobs to help fund their studies, and therefore a rising cost of living creates a need to increase their hours of employment. This creates student anxiety and stress, and affects their capacity to give their studies the time that is needed. Disadvantaged and low SES students are those most likely to be affected. If the situation persists, the participation rate could deteriorate.

Q32 How can best practice learning and teaching for students from under-represented groups be embedded across the higher education system, including the use of remote learning?

There is no such thing as 'best practice' in teaching and learning situations. There is always a variety of approaches because students differ in what may suit them, and some approaches may be better than others, but that's all. Good teaching may take various forms, and no single one need be 'best'. Let's jettison management clichés that misrepresent a more complex situation. Helping students from under-represented groups, those with language and/or writing difficulties, and/or those who are disadvantaged is primarily a question of time and effort for many academic and teaching support staff who have marked individual student contact, responsibility and involvement, whether it's face-to-face or online. Again, it's a question of available resources and recognition of the extra work created for individual staff. Universities have a very important role to play, but they cannot in all cases make up for the inequality that pervades school education. See also the response to Question 30 on access and participation.

Q38 How can the Accord support higher education providers to adopt sector-leading employment practices?

Presumably this question arises from the terms of reference concerning responsibilities of institutions towards staff (page 41 of the DP). There are serious ethical issues in how universities deal with staff, and this is one of the challenges for the future. Several aspects are discussed.

Staff working conditions and ethics should be taken seriously. Page 28 of the DP says of academic staff employed full-time: 'there is a relatively high concentration of staff with joint teaching and research roles. This reflects industrial arrangements commonly agreed in universities.' This may be what's on paper, but in fact for many staff their workloads are such that their capacity to conduct research is very severely limited or even non-existent. Universities show no concern to ensure that they meet the agreements which many staff feel are no more than bits of paper. This is just one of the ethical issues in how universities deal with staff. University managements often expect staff to be publishing in leading international journals, which most staff feel is essential to advancing their careers, while in many cases the University does not provide the time or support to carry out that research. Management ignorance and indifference about what it means to achieve at high international research levels is frequently evident. It should be noted that over time, if staff feel they have no

opportunity to pursue the career they imagined an academic vocation would provide, including time to do research, the quality of academic staff will decline and the attractiveness of an academic career will be minimised, with a consequent effect on teaching and research quality. Hence, for both academic and pedagogical reasons a 'relatively high concentration of staff with joint teaching and research roles' (as noted in the DP) must be maintained.

Part-time appointments. Staff with such appointments sometimes find they have more work assigned than is covered by their part-time agreement, often due to lack of teaching staff and resources. Such staff then must do unpaid work, another ethical issue needing action by universities.

Casual staff. Universities make too much use of casual staff, who are often treated badly. This was epitomized by ethical failure in cases where universities underpaid casual staff, seemingly deliberately. Another ethical issue is casual staff are commonly not fully paid for the *actual* work they do. That's because the rate, say, for preparing a lecture need not reflect the actual amount of work involved. The *actual* amount of work for casual staff depends upon many factors, such as the availability and/or quality of existing notes and materials, and whether they are suitable for the course, which may have been subject to changes (for example). Circumstances across individual cases vary enormously so that it is virtually impossible to administer in a fair, consistent and ethical way. In effect, casual staff do piece work as far as universities care. To alleviate this entrenched problem, there should be more full-time academic staff and fewer casual staff with all staff being treated with the care and respect that they deserve.

Misuse of Key Performance Indicators. KPIs are regularly misused in universities in a system that encourages the evaluation of an individual's research simply by the number of 'outputs', or similar. Outputs can themselves vary greatly in nature and quality, and judgment of their research should take account of the wider circumstances affecting a person's research opportunities, and whether the university is meeting its obligations to that person under the enterprise agreement. Often, the KPIs provide perverse incentives for the way research is carried out and published. Although it depends on how they are used, usually KPIs provide a simplistic algorithm that is simplistically applied and that fails to measure a more complex reality (as happened with the robodebt scandal). The Accord should state and expect that universities will adhere to the *San Francisco Declaration on Research Assessment*, or to have procedures taking full account of its approach. This is another ethical issue.

Q39 What reforms are needed to ensure that all students have a quality student experience?

See the response to the almost-identical Question 8.

Q49 Which aspects of the JRG package should be altered and which should be retained?

As noted in the DP, the Productivity Commission's current Interim 5 Year Productivity Report considered the JRG changes and noted that 'there is little evidence that differential subsidies effectively address skills shortages'. The Accord should reflect the statement of the Productivity Commission and not charge differential fees on the basis of a supposed connection between a degree and employability. The changes made in the JRG package also sent a strong signal of being ideologically motivated and misinformed about the importance and content of the humanities and social sciences for Australia. What is more, it is a blatant contradiction if a government that wishes to increase quality and get better individual educational outcomes decides at the same time to increase the number of students while government and other funding remains fixed.

<div align="center">*****</div>

Independent Scholars Association of Australia, https://isaa.org.au