Alison Downham Moore submission responses to selected questions for the Universities Accord consultation

Responses to these selected questions are informed by 25 years of teaching, research and governance in 6 different regional, G08, technology and innovative research universities in Australia, by my visiting academic experiences in the UK, US and Germany, by 1 national and 2 international competitive grants, by both humanities and science bachelor and PhD studies, and more recent continuing professional studies, in 4 different Australian universities and 1 UK university, by holding an *AdvanceHE* Senior Teaching Fellowship, and by a role as an internationally accredited peer-reviewer for the US non-profit organisation for quality online learning, *Quality Matters*.

Q.4 Economic and climate challenges, ageing populations, geopolitical instability and rapid technological changes likely over the next 30 years will require increasingly large numbers of Australians to learn new professional skills throughout the lifespan. The social practice of HE occurring only in youth is waning and is widely predicted to shrink, yet university degrees are still structured as if school-leavers are the most relevant cohort. The relative lack of fully online professional development micro-credentials available to working people seeking specific skills training is a limiting factor both for equity of higher education and for meeting the skills deficits in many industries.

The ageing of populations must be considered in relation to the HE landscape, with greater attention given to the retraining of older adults to permit them to remain in the workforce for longer, reducing state costs of both aged care and pensions. The older student cohort, many whom live with disabilities, has particular needs that are currently not considered specifically in curriculum design and teaching delivery. Post-secondary education fee reductions for retirees would help to incentivise the larger cultural shift needed to encourage older adults to retrain and continue contributing to the economy. An incentivisation system of older adult higher education should aim to pay for itself over the long-term through reduced aged care and pension costs.

Q.5 Professional development micro-credentials are an obvious solution to the problem of universities needing to cater better to the growing need for lifelong learning. The biggest limiting factor for their development appears to be lack of high-level curriculum design and teaching capacity since academic staff already report significant overwork in servicing existing degrees and new micro-credential subjects require additional labour. Universities require flexibility to experiment with new micro-credentials, making them understandably reluctant to invest in new continuing staff for their development.

New investment in the micro-credential landscape has been expensive for universities to develop using new hire of staff and is therefore limited. Increased federal funding under the existing micro-credentials framework would incentivise universities to invest in them more substantially. Structural changes may also be needed to permit universities greater flexibility to market repackaged subjects and majors within existing degrees as stand-alone micro-credentials - which are offered as fully online subjects to cater both to working professionals and to other kinds of distance students. But to ensure continued quality of degree offerings, measures will be needed to ensure that degree integrity is internally monitored and externally evaluated.

Q.10 Many online offerings have been abolished by universities in the attempt to revive campus life after the Covid-19 lockdowns and TEQSA has limited the capacity of HE providers to provide no more than 15% online offerings. Online offerings are crucial for equity and diversity since they are a significant pathway through which students with disabilities, remote populations (including Indigenous populations), parents of young children, carers, the elderly, and fulltime working professionals access both full degrees and continued professional development credentials. At the same time, the quality of online offerings in Australian universities is highly variable, with many still treating them as simply an online upload of activities developed for face-to-face teaching. Increasing access of disadvantaged groups to HE will require an expansion and improvement of the online offering landscape, with federal incentives for providers to invest in online subject development, and no limitations placed on their capacity to digitise offerings. Online learning pedagogical research is an established international field of higher education research, and the evidence and best-practice standards of this specialist field must be consulted for development of a clearer set of national standards for online HE.

It is important for campus life to be sustained and for in-person student live to be regenerated. But such students will constitute a smaller proportion over the coming 30 years in the movement toward lifelong learning in ageing populations that are likely to defer retirement for renewed professional activity in later life. Pandemic or not, universities must begin now building the infrastructure to accommodate this diverse online cohort and take more seriously the virtual student body who are currently still treated as a dispensable afterthought with little consideration of their specific needs as students. Novel online international community innovations, such as the virtual party and festival scene, which developed during the Covid-19 lockdowns should be studied for their potential application to online communities of inquiry. Universities should also be incentivised to provide an expanded network of regional study hubs and live lecture tours by teaching staff to provide hybrid components for distance students.

**Q17. One problem of misalignment in the university system currently is the lack of integration between teaching and research which must be addressed via a broad rethink about the nexus of these dual aspects of scholarly activity.** There are several far-reaching consequences of the current disconnection. Student fees are commonly viewed as paying the salaries of researchers - an unhelpful perspective that encourages both a predatory view of students as nothing more than dollar-signs, and an outmoded view of research as a luxury that only serves the interest of individual researchers themselves.

The recent fixation on international rankings has contributed to the loss of the teaching-research nexus in Australian HE and to the isomorphism of universities. The reputational surveys on which the THE ranking relies are low-quality since they ask respondents simply to recall from memory which of the 1,799 global universities have produced the most outstanding research in their disciplinary field (THE 2023). Respondents therefore tend to privilege older, established institutions of the geopolitically-privileged northern hemisphere, failing to capture either research innovation or interdisciplinary excellence in the newer universities worldwide (University Wankings [sic]2021). Neither Scopus-based measures nor international rankings are therefore likely to provide meaningful information about where quality lies in research. And yet, even as early as 2009, one large survey of higher education managers globally indicated a majority had already begun implementing changes on the basis of such rankings (Hazelkorn 2009). Since 2019, a substantial global movement opposing the overemphasis on international rankings and citation metrics has now grown (Selten et al 2020; Oslington 2020).

**The NCGP has enabled a small proportion of individuals to operate as fulltime researchers for most of their careers, removing them from the teaching workforce, while teaching and research academics struggle for scraps of funds and workload sufficient to advance their research at all**, reporting significant overwork from the expectations of them to perform in all aspects of academic work in order to access promotion, or even to retain their positions. This overwork culture then undermines teaching enthusiasm, innovation and delivery. This situation has been compounded by the constantly rising student:staff ratios since the 1990s, coupled with the increased participation in HE which has brough large numbers of students who are ill-prepared for higher learning due to insufficient literacy and numeracy skills, or English-language competency.

The new appearance of **teaching-focused** roles has the potential to accommodate different academic forms of work and infer more appropriate esteem for the valuable labour of university teachers. However, in practice many teaching-focused staff are frustrated and thwarted by a lack of support for them to make a contribution to the research landscape.

**Research institutes** have importantly provided long-term project development and postdoctoral opportunities for early-career researchers nested within strong communities of inquiry. However, they have also provided the opportunity for a small elite cohort of researchers to take the lion’s share of NCGP funds, at the expense of a more distributed support scheme supporting researchers who also teach. This problem may be remediable through changes to the ARC grant schemes with a large number of smaller grants made available to distribute funds more evenly.

If the HE sector is serious about translating academic research into real-world impacts, it must surely in the first instance address the question of **how research informs university teaching** – a value which everyone seems to agree is important but which is never addressed in structural reform or organisational change. The growth of a teaching-focused workforce in universities who are not active researchers needs to be seriously considered in relation to research translation. Workplace training programs must of course increase but they will not themselves contribute to the problem of translating cutting-edge research to industry. Students can be an important vector of that translation as they train with and later transition to roles in industry but only if their academic training in the first instance has been part of emerging research happening at a high level within the university. **Degrees in most universities are still filled with generic knowledge inherited from archaic disciplinary norms which reflect what academics are most comfortable teaching within widespread contexts of overwork**. An expanded micro-credential landscape would help to break-up academic ossification by permitting academics to innovate and replace parts of their traditional teaching one piece at a time toward more practical skills training and research integrated learning, supported by the learning professionals in which many universities have already begun to invest.

**Teaching and research are also held apart within universities by the entirely different systems of external quality evaluation in TEQSA and the ERA** (research evaluation is addressed in Q41 response). There is no good reason for this separation and the scope of TEQSA’s evaluation of institutions should be enriched to encompass both research quality, and the extent to which the institution’s research informs its teaching within a holistic institutional mission. Greater integration of the ARC with TEQSA should be considered through joint interventions and shared assessors via the recruitment of integrated teaching-research specialists who can evaluate the teaching-research nexus.

Q19. **A more effective and collaborative governance approach should address the obvious cultural divide within HE institutions between academic and management staff which undermines collective capacity for innovation, change and quality**. A Western Australian research group recently surveyed academic staff across five institutions, reporting that many described the leadership of their institutions as ‘exploitative, oppressive, toxic and fiscally driven’, and reported feeling ‘dehumanised and demoralised by management’ (Whitsed & Girardi 2022). Numerous works by education scholars have highlighted the alienation of twenty-first-century academics in response New Public Management restructuring in Australian and UK tertiary institutions, often conflating this organisational approach with the political economy of neoliberalism (Bosetti & Heffernan 2021; Smyth 2017; Saltmarsh et al 2011). The wholesale importation of the New Public Management system into Australian Universities after the Bradley reforms importantly professionalised many management processes (Marginson & Considine 2000). But it has also resulted in greater division which imposes far-reaching limitations on the capacity of management to implement strategic or major structural change. Many universities have recently begun transitioning to a model of more connected and distributive leadership, through increased consultations processes and enrichment of middle management governance positions. ‘Third space’ professional staff constitute a rapidly expanding additional workforce in HE institutions who must be better supported as crucial university workers and better integrated into the unique teaching and research mission and purpose of respective institutions.

Academics, for their part, require greater induction into management structures and practices of the institution through increased enrichment of middle management roles and academic continuing professional development. Academics are currently mostly ill-equipped to manage universities, but the growth of middle management roles is permitting the development of individuals whose work spans both domains and who are thus uniquely qualified to understand the tensions, risks, opportunity costs, and long-term consequences incumbent upon management decisions in a balanced and nuanced way. This middle must be grown substantially, funded by the relative reduction of senior management positions with exorbitant corporate salaries: We need fewer DVCs and more Associate Deans, Directors and academic Senate members. Currently, there is little opportunity for academics to participate in management projects and strategic interventions unless they abandon all their academic work and apply for 100% management roles. This single-line management position structure must change for a more distributive and connected leadership in universities. Single-line management systems are not the only model of organisational structure, and a more distributive model would permit staff to split their time between teaching/research and management activity.

Universities strategies are frequently developed by eternal consultancies, with the result of them all largely resembling one another (Devinney & Dowling 2020), indicative of impoverished vision at the whole institution level. A more distributed leadership of universities would help to solve the problem of isomorphism of Australian universities, refreshing the question of each institution’s unique mission, strategy and purpose via interpersonal practices of dialogue, rather than viewing strategy purely as the rational planning of executive management or consultants. This view of strategy development as a dialogic process aligns with the recent trend in higher education leadership scholarship which has increasingly emphasised connected and distributed leadership. Leadership in the distributed model is an emerging property of interacting individuals, with open boundaries, and distributed across the many, rather than located within a specific individual. Distributed leadership brings both greater staff wellbeing and greater institutional sustainability when it is located throughout the whole university (Bolden et al 2015; Dooris et al 2018).

The top-down managerial approach may also be incompatible with emergent, entrepreneurial forms of leadership increasingly needed in higher education institutions. Entrepreneurial adaptability will support universities to diversify their funding sources for greater sustainability but requires more loosely coupled structures of authority than the stable model of New Public Management that has become common in university organisational strata in Australia and in the UK since the 1990s. According to this emergent view, following the pattern of biological ecosystems, universities will thrive best by carving out a niche rather than attempting to compete according to global rankings which tend toward isomorphism (Young, Mitchell & Pinheiro 2022).

Ideas about ‘complexity leadership’ also refer to organisations developing greater adaptability in facing challenges of complex situations. In uncertain and rapidly changing contexts, greater network interconnectivity is protective and robust, following the pattern of biological systems theory, in contrast to the fragility of top-down strategy. A recent book about resilient universities argues that resilience is located not in particular individuals but collectively, suggesting that university management might become better able to adapt to volatile, uncertain, complex and ambiguous contexts by developing greater connectivity and cohesion across the institution (Gustiniano 2022). Others have referred to leadership in diverse business and organisational contexts, prescribing connectedness as the best response to a volatile and rapidly changing world, since it permits adaptiveness while retaining a strong core (Fumasoli et al 2015; Young, Mitchell & Pinheiro 2022). To achieve this though, all people working within an organisation need to understand why they exist together as an entity, sharing a clear sense of their mutual interdependency and of what they are trying to achieve (Davis & Jones 2014; Hayward 2015).

Q33 A significant barrier to retention of students from both low-socio-economic and English-as-a-second language backgrounds is that they require substantially more support and teaching labour which is not currently adequately addressed in Federal funding. Universities have invested in literacy programs, transition Colleges, mentoring schemes, all which have increased retention of disadvantaged groups. But the necessity to restrain costs has broadly compromised the efficacy of teaching programs in universities outside the G08. **Universities with higher proportions of disadvantaged groups should receive substantially higher Block funding than institutions with higher proportions of more privileged students, in recognition of the greater expense needed to retain disadvantaged students, bring them up to standard, and set them up for career success post-graduation.**

Q41. **A major reform in needed of research quality evaluation in Australia.** Several Australian university leaders have long complained of the isomorphism characterising our institutions since the Dawkins reforms (Davis 2017; Bebbington 2020), whereas the European approach to defining institutional purpose through cooperation, rather than through competition and mimicry, has produced a wide spectrum of diverse higher education entities all operating at a very high standard. The solution to this problem is not to deny research funding to some universities that have already invested massively in it over the past 30 years. Instead, what is needed is a revision of research evaluation and funding that takes account of the current reality of inequities and systems of privilege in the actual research landscape.

The Australian Research Council’s Excellence in Research, Australia (ERA) has followed the general international practice of Performance-Based Research Funding Systems, except that it has never been tied to federal funding. Several recent global changes have complicated the question of how research quality may be evaluated: Firstly, the growth since the early 2000s of bibliometric methods focussed on citations, which have been increasingly taken as a proxy for quality in Australian universities, despite citation practices varying wildly across different disciplines. A second development is the proliferation of global rankings of institutions which rely on reputational surveys and on citations.

The broader historical shift toward performance-based evaluation of HE in Australia has generally been associated with an important turn toward cultures of continual improvement in the post-Dawkins era (Marginson 1997). However, **it is worth asking if the ERA has not fulfilled its purpose and can now be dispensed with altogether since it is not itself a developmental system.** All research ranking and rating measures that have emerged internationally and nationally over the past 30 years have limited validity for quality assurance purposes within institutions since they do not provide adequate guidelines on how to improve research quality, either for the strategic leadership of the University’s executive, or for individual researchers wishing to raise their own performance. **External rating/ranking systems refer to downstream time-specific measurement of belated outputs (lagging measures), and none provide developmental advice for institutional improvement. This must change.**

Research quality has also increasingly been evaluated via the pursuit of **citations and international rankings, both which are increasingly viewed as unreliable and inaccurate measures of either research or teaching quality** and where it is well known that gaming has occurred globally. Since 2017, predatory journals have been indexed in citation databases and have been identified in the Scimago Q1 rank in multiple disciplines, enabled by the use of citation cartels (Severin & Low 2019). Even when they reflect legitimate quality publications, both citations and rankings are still external and downstream indicators, and are not easily integrated into an improvement-focused internal research quality culture, since individual researchers apprehend that there is little they can do behaviourally to influence these measurements (apart from gaming). The ideal of research quality must be agreed upon by the major stakeholders within the institution. Top-down management compliance demands for greater productivity are likely to be resented and resisted by the academic workforce, because many of the factors responsible for improved rankings and ratings are systemic and not controlled by the workforce. International rankings, citation metrics, and indeed even national ratings such as the ERA, have all been exemplary of this problem in universities.

**Research quality should not be equated solely via citations,** against the view of some research leaders who have argued that citations are a reasonable proxy for quality in science, technology and mathematics disciplines (Cao, Trapp & Baldock 2020). Many specialist bibliometricians advise against the use of citations as a proxy for quality given the variability of practices of citation across different disciplines (Gringas 2014; Leyesdorrf et al 2016). Other experts refer to the use of citations and h-indexes in research performance evaluation as misleading, and generally insufficient to capture the full richness of the work occurring in universities (DORA 2022). Citations have been observed to favour English-speaking researchers, reinforcing forms of geopolitical privilege inherited from the British empire and from the superpower status of the US (Boussebaa & Tienari 2019). Men have also been observed to attract higher citations than women (Chatterjee, 2021; Zhang et al 2021), so that their overemphasis risks creating a counter-pressure against the important work of gender equity in which universities have substantially invested Steinþórsdóttir, Heijstra, & Einarsdóttir 2017). While it may be hoped that newer universities in Australia may overcome the inherent biases in favour of G08 institutions in ERA peer-review disciplines, high citations globally have also been observed to follow the relative prestige of a researcher’s institution (Nielsen & Andersen 2021).

**A large global movement is now concerned with the problem of research quality and diversity not being adequately reflected in existing citation-based measures**, including the recent Tara initiative to develop more appropriate research evaluation measures proposed by the San Francisco Declaration on Research Assessment (DORA 2022); the UK Independent Review of the Role of Metrics in Research Assessment and Management (FRAP 2015), the Helsinki Initiative on Multilingualism in Scholarly Communication (Federation of Finnish Learned Societies (2019), which aims to overcome the English-language bias distorting global understanding of research impact and quality; the European Union’s European Network for Research Evaluation in the Social Sciences and the Humanities (ENRESSH 2016), and specifically the French EVALHUM Initiative of the European Cooperation in Science and Technology (ECST 2019). The Leiden Manifesto of 2015 proposed ten principles for an appropriate use of citation metrics in research quality evaluation, which include: Always combining them with expert peer-review; relating them to the mission and purpose of the institution; protecting locally relevant research; ensuring transparency of evaluation measures; accommodation of variability between disciplines; evaluating individual researchers holistically; avoiding misplaced views of citations as more precise than other measures; recognising impacts of evaluation on staff; and continually revising methods in light of new information (Hicks et al 2015).

Bibliometrics constitutes a rapidly evolving science. New measurements for counting research productivity and quality are in continual development, with likely improvements in publication capture and disciplinary diversity on the horizon (Szomszor et al 2021; Hammarfelt 2016). There are now explicit proposals under development for a Humanities Citation Index (HuCI) (Colavizza, Peroni & Romanello 2022; Hammarfelt 2016). Nonetheless, significant limitations have persisted with Elsevier’s Scopus, on which so many other metric feeds continue to rely. Field-weighted citation indices (FWCI) suggests a promising, relatively new metric which overcomes the problem of larger and higher-citation disciplines being ranked higher than small disciplines with low-citation norms (Aksnes, Langfeldt & Wouters 2019). FWCI for now remains unreliable for all disciplines too since it has been found to correlate poorly with humanities peer-review evaluations in the UK REF (Hulme, Wood & Shi 2020; FRAP 2015). Like other SciVal measurements, FWCI counting of citations ceases at four years, whereas humanities and creative citation patterns follow a longer time-frame (Aksnes, Langfeldt & Wouters 2019).

Peer-review practices on which the ERA has historically relied for evaluation of humanities and creative disciplines provide the most obvious potential alternative to citations for evaluation of research quality, since they are well-established in international scholarly norms (Lamont 2009). The detriment of peer-review is its vastly greater expense compared to bibliometrics. Moreover, **peer-review of research too has been found to be problematic by many scholars focusing on the study of Performance-Based Funding Systems (PBFS)** (Larkins, 2019; Possamai & Long 2020; Sawczak 2021; Guthrie & O’Connell 2022**). Australia’s ERA has not previously employed a transparent, specific or measurable set of criteria nested within a public and official rubric in any of its previous peer-review assessments** (Glisovic 2016; Guthrie & O’Connell 2022). **If the ERA is to continue using peer-review, this must change.** Whereas teaching quality evaluation practices internationally typically refer to specific and measurable criteria-based rubrics, guidelines for the evaluation of research quality have often tended to be far less clearly defined (Bonaccorsi 2018; Lamont 2009).

Peer-review research evaluation systems have not themselves been evaluated for efficacy, transparency, consistency or internal validity (Forsberg et al 2022). Other researchers have specifically criticised the ERA peer-review process for lacking transparency and accountability (Larkins, 2019; Diezmann, 2018); for lacking internal validity of assessment measures (Possamai & Long 2020; Akker, 2016; Vanclay, 2011); for potential gaming by institutions of the assessment procedures (Henman 2015; de Rijlke et al 2016); for overlooking the impact of the assessment cycle on academic work and on third-space professional staff, who are also key stakeholders in the matter of research quality evaluation (Sawcek 2021); for their paucity of feedback provided to the institution about how its research quality may be improved (Brawley 2022); and for working against gender equality in academic research (Gilbert, O’Shea & Duffy 2021). The growth of practice-based disciplines in the Australian higher education sector, producing Non-Traditional-Research-Outputs (NTROs) has also problematised peer-review practices, which have been seen as insufficiently criteria-based, transparent and systematic, resulting in high risk of bias (Glisovic, Berkeley & Batty 2016; McKee 2020).

While peer-review has the potential to provide meaningful data on research quality, the **issues of bias, validity and transparency will need to be resolved if such data is to form the basis of quality evaluation** which requires predictability and consistency to be of use for institutions’ own planning. If institutions are to be supported in producing innovative quality research, there needs to be an external research quality framework that is transparent, instructive and developmental in approach, takes account of institutions’ respective unique histories and path dependencies, and which is clearly publicly communicated. The development and integration of such a similar internal quality framework for each institution should be one of the measures of by which its research quality is judged in the external evaluation system, to ensure that what is being measured is not merely prestigious outputs supported by conserved gender, institutional and geopolitical privileges.

Q29 **Universities themselves should be permitted to offer workplace training programs within the University as part of HDR programs, via an expanded suite of HDR skill development credentials aimed at building a more integrated university workforce.** It is currently viewed as not appropriate for universities to designate units within themselves for workplace training federal funding, but this could be permitted under a carefully scrutinised system. There are currently labour deficits in universities for both technologists, industry liaison specialists and learning professionals, while academic staff require continuing professional development to bring their skills up to date with changing industry and graduate needs. Workplace training within universities would help to create meaningful work opportunities for HDR graduates who want to work in in the HE system but cannot access academic positions. It would also teach university academic, management and professional staff much about the challenges of workplace placements, from the inside. Over time, it could contribute to a professional staff workforce that was HDR-qualified and better equipped to participate in management structures, further contributing to a more connected and distributive leadership of the university. It would also give the entire academic workforce a stronger common culture, with the potential to increase institutional quality values and workforce cohesion.

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