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**Submission to the Universities Accord**

To give some information on the background I bring to these responses to the Accord Discussion Paper, I am a former President of the Australian Academy of the Humanities, a former Federation Fellow, the convenor of the ARC Cultural Research Network, the chair of the Humanities and Creative Arts panel of the ERA in 2009 (the trial), 2012, and 2018, a former member of the ARC’s HCA College of Experts, one of only two humanities academics appointed to PMSEIC and the only one to serve two terms, the co-author of the landmark study of the state of humanities, arts and social sciences in Australia (*Mapping HASS,* 2014), and a veteran of many research and higher education policy committees and working groups to do with, for instance, national research priorities, national research infrastructure, the national curriculum, and the indicators and design for ERA and EI.

The primary proposals contained in what follows include:

* The establishment of an independent national coordinating commission to manage the higher education sector and what I describe as our knowledge infrastructure in the long term national interest, as a counterweight to the current tendencies towards short term corrective strategies, undesirable market concentration, a lack of diversity, and political influence.
* Limiting the scale of casualization of the academic workforce through some kind of regulatory intervention, such as capping the proportion of casual staff within individual universities, if we are to avoid further compromising the quality of teaching and burning out the next generation of academics.
* The proposal to restructure the institutional context for research funding by moving away from the one-size-fits-all approach taken by a single institution such as the ARC, and considering alternative focused models which involve a number of funding institutions designed to more accurately and economically address the needs of specific discipline clusters, such as occurs in the UK.
* Reviving earlier models of the purpose of higher education as focused upon education rather than merely upon training or skills development, with a consequent reinvestment in the prioritisation of general degree programs aimed at developing flexibility in employment and a broad range of widely applicable intellectual and communications capacities.

The following comments respond to selected questions from the Discussion Paper.

**Q1.** This first set of comments refers to the limitations in the current approach to Australian higher education. Over time, universities have been encouraged to think of themselves as businesses and the higher education sector has been structured more and more as a market. It has functioned in ways that markets often do -- with competition creating winners and losers which leads to market concentration and generates inequalities. Framing the character of the sector as essentially that of a commercial competition means that the least profitable strategies are either discarded or underfunded. For the university sector as a whole this has resulted in a reduction in the diversity of offerings available to students and therefore in the breadth of the knowledge base provided to the community and the nation. While there may be some point to introducing market-based drivers in relation to certain aspects of the sector’s performance, such drivers have been used overwhelmingly as a means of filling the gap created by reduced federal funding, rather than to produce a more high quality and flexible sector. As a commercial corporate approach has become dominant in the last two decades, we have lost sight of the objective of working in the national interest to support the full range of the goals we should pursue in higher education -- the education of a civilised citizenry, the creation and dissemination of knowledge, the preservation of our heritage and culture, and professional training. Only some of these goals can be met by a market in the current circumstances. The country requires a process of long term strategic planning for the sector as a whole to ameliorate the destructive influences of a predominantly market-based approach.

It is important to recognise that while certain aspects of the sector do work as a market, the maintenance of a substantial knowledge infrastructure requires a long term commitment to a comprehensive knowledge base that must be protected against short-term market movements. There are clear examples where Australia has only belatedly discovered that this has been needed. In the fields in which I have expertise, humanities programs such as those in languages and cultures, there has been a consistent trimming of offerings across the sector. We have seen the consequences of diminished capacity in such areas: Australia found it that had very little expertise in Islamic history and cultures at the point of 9/11 and thus in a poor condition to understand the forces motivating it; more recently, we have only belatedly discovered that the development of AI involves not just technical computing expertise, but also a broad range of social, medical, and ethical considerations that have only now been put into the mix -- well after the horse has bolted. Our much reduced capacity in the teaching and research into Indonesian culture, history and languages is also likely to expose us in the future in our dealings with our nearest powerful neighbour.

While it might be possible at the macro level to rationalise the provision of course offerings as justifiable market-based decisions, this misrecognises the limited extent to which a university can actually work operate like a market. If enrolments in one market, say in Russian, decline, we can’t just move the Russian teachers across into Spanish. A ‘demand driven system’, however it is configured as a means of managing undergraduate enrolments, is not fit for the purpose of maintaining the nation’s knowledge infrastructure without the implementation of complementary, long term considerations of the national interest.

The national interest should not be left to the responsibility of individual universities. Since their interests have been progressively defined as commercial rather than public, they are no longer acting as the custodians of our national capacities in teaching and research -- either individually or as a sector. Nobody is. We hear constant talk about restoring our ‘sovereign capacity’ in manufacturing; we also need to think about how we restore and maintain our sovereign capacity in the production of knowledge and the provision of expertise.

**Q2**. If one was to take a long historical view of the sector, one would not describe the current situation as one of diversity. The sector was far more diverse 50 years ago. Once Dawkins’ Unified National System clicked into place, the tendencies have been all the other way. Forced amalgamations, the elimination of what were effectively teaching-only institutions (the CAEs), the emphasis on building scale, and the erosion of the innovative missions of smaller interdisciplinary universities such as Griffith and Murdoch, have all worked to turn the sector into one that is largely driven by the same imperatives no matter which community they served. While the contexts of operation may vary somewhat (as in the community role of regional universities, for instance, compared to metros) the strongest drivers of funding besides undergraduate enrolment numbers (that is, external research income and postgraduate enrolments) push all universities to compete on the same grounds, in the same mix of disciplinary fields (so, research development has prioritised science) and with the same objectives: to become bigger, more successful in earning external research funds, and to generate operating surpluses as a hedge against declining federal funding In the ERA, universities with limited research capacity find themselves compared with the sandstones. Their failure in this comparison has reputational as well as financial effects. To correct this, or at least to improve their ranking, they are forced to try to become as much like their competitors as they can. This might involve big investment in targeted areas of research, or a pitch for a medical school, or some other strategy to build research earnings. Typically, in order to achieve something like this and despite recent regulatory attempts to rein this in, universities have raided teaching income to cross-subsidise research development, and then increase their use of casual staff as a means of reducing teaching costs.

If we were serious about diversity, we would think differently about a funding structure which effectively treats all universities the same, and engages all of them within the same competition -- even though it should be clear (from, say, the shares of competitive national research funding) that the differences in scale, depth, location, and institutional history frustrate any hope of this actually working like a level playing field. If want a diverse sector, we need to think about ways in which to diversify the funding drivers to direct different patterns of behaviour towards different policy objectives.

**Q5.** The current arrangements work against flexibility and responsiveness to change, at least partly because of the size of the institutions involved, and the pressures noted earlier -- to see scale as the core objective for everyone. It is likely that smaller, more agile institutions would be better placed to deal with the pace of social, economic, and cultural change we are experiencing at the moment, but our policy environment has worked against supporting this kind of institution for many years.

We have tried various ways of addressing this. On funding structures, we have a long history of seeking to create funding protocols that recognise disciplinary differences in patterns of delivery and the cost of teaching. At various times, the funding models adopted have been marked by extreme variations in the funding allocated per FTE in each disciplinary cluster. Since the pandemic, the use of hybrid methods of delivery have become the norm, the use of social media and online platforms have greatly expanded the teaching envelope for staff and students, and there is now much less variation across disciplines in how their material is taught or delivered to their students. Setting aside the disruption caused by the JobReady Graduates package, and assuming that there will be a further round of development for the next phase of cluster funding, it would be appropriate for this to produce a much flatter structure with much less variation of costs between disciplines.

 I come back to the institutional structure and other issues related to that in my response to **Q37.**

**Q8**. In terms of the quality of teaching, and of the learning experience for students, a crucial area for change is the over-dependence upon casual teaching. This has gradually increased as universities have cannibalised their teaching budgets to fund research, and as federal funding for (and interest in) teaching has declined. The quality of the student experience has also been affected by research funding for fellowships and teaching relief which has increasingly taken high performing staff and leading researchers out of teaching. This deprives students of access to staff who may not necessarily be the best teachers (although they often are) but who are likely to be the most eminent researchers and knowledge producers -- and so, the ones you really want your students to encounter. Casual appointments also deprive students of access to staff for consultation as they usually don’t have offices on campus, and they are often working on several campuses at once. Further, they represent a lost opportunity for course development and the improvement of teaching; they are not in a position to pass on student feedback into the process of improving teaching and offerings.

Most concerning for the future of the sector’s workforce, as casualisation exploits young staff with serial short term appointments with limited prospects of conversion to permanent positions, a number of reports have noted how this is driving some of our most talented graduates out of the profession -- in reports noted in the *Mapping HASS* study, up to 30% of staff surveyed were looking to move out of academic work and this has only got worse in the intervening years. The disproportionate targeting of casual staff during the budget cuts connected to the pandemic has played a significant part in further depleting our resources for the future.

A future plan for the academic workforce could set limits to the proportion of teaching that is carried out by non-permanent staff (say, 20%), as well as a more formally designated process for the transition of casual staff with repeated appointments into permanent positions. It is important we put structures in place that support young casual staff so that they can return to the position of having reasonable expectations that the sector will be able to offer them permanent positions over time.

**Q9.** There is a strong argument that rather than continually responding to the specific training demands from various professions, the sector might better serve the nation by opting to support higher quality generalist degrees -- returning to the idea of a university qualification as a broad education that would equip the individual for a range of employments. The emphasis on skills rather than education narrows the horizon for a university education, and is potentially endless in its demands for ever more specific training programs. We need to have more rigorous conversations about where that kind of job-specific training is most appropriately accessed -- at the potential workplace, for instance, or within the university. Business, understandably, wants the university to do this job for them, and we need to reconsider whether that is really what the system is for. A renewed focus on the universities’ capacity to develop generic skills that would be applicable to a wide range of professions (communications or analytic skills, for instance), and that would position them to deal with changes in employment patterns in the future, seems like a better option than continually slicing the offerings into ever more bespoke sets of skills based programs at the cost of a broad-based and widely deployable body of knowledge and capabilities.

**Q13**. Further to this, the relationship between industry and universities around placements and internships is poorly developed because so much of it is subject to variations in practice at the time. Industry can be reluctant to commit resources to these training elements, even though they tend to support them in principle, because they are usually asked to do so without adequate compensation. In programs where some kind of placement is required, there needs to be a much more comprehensive regulation of how that occurs and perhaps a stronger consideration of how it might be funded. Where it does occur at present, it is often patchy and ad hoc, at times leaving students themselves to find a placement and negotiate its management. If the government is serious about maintaining this kind of component within professionally oriented programs, and it should be, then it needs to consider what kinds of incentives can be offered to businesses to ensure that placements are available, how they might be managed more consistently (by the program, not the student), what kind of regulatory oversight should be in place, and how they might be better factored into the funding models.

**Q23.** Fostering better research collaboration between industry and universities has long been a problem. This is not only due to some university researchers being reluctant to dirty their hands by working with industry. It is also due to industry having a primarily transactional interest in their collaboration with universities. Industry tends to see university research as a source of development funds, not as a joint intellectual venture. There have been government attempts to encourage industry to invest more heavily in research but there aren’t many which have had substantial effects on their behaviour or on their relationship with university researchers. In the case of the costly government initiative, the Research Investment Tax Incentive, some would argue that it has done little to develop new knowledge or generate new research partnerships. The subsidies tend to go to large and wealthy organisations, since they are the ones with the capacity to absorb the opportunity cost of applying for these incentives, and there is anecdotal evidence that it is largely a way of subsidising activity that would have happened anyway. While it may be seen as helping to encourage industry research, its remit is highly restrictive in what it accepts as university research; research in the humanities and social sciences, for instance, is explicitly excluded.

In relation to the ARC’s Linkage programs, and notwithstanding the modifications that have occurred in recent years to make their allocation more timely, it is widely documented that the time frame and institutional protocols for these militates against the development and execution of the very research partnerships it hopes to support. Given the processes employed to create and assess applications, it is hard to see how this can be fixed without making further modifications to the process.

Perhaps, we need to acknowledge that the continuing failure to build solid bridges between industry and university research has a cultural basis to do with each of the prospective partners’ attitude to the benefits of working with the other. Crudely, the typical university researcher tends to think of industry as venal and uninterested in the actual focus of the research, while the industry tends to frame university research as too ‘academic’ and unrelated to what they think of as ‘the real world’. There is some support for that latter attitude in our culture’s residual anti-intellectualism, and it is difficult to see how it can be reversed without some consideration of what kinds of incentives would actually serve the objective of supporting collaboration while prioritising the benefits of research -- such as a greater emphasis on building more long term, program-based (rather than project-based), collaborations or research networks which bring university researchers and industry together in a less transactional relationship.

**Q36 and Q37.**

As noted earlier, the current structure and governance of the higher education system does not work towards the effective maintenance of the nation’s knowledge infrastructure as a coherent whole. It is overly driven by market logics and too much at the mercy of the prosecution of the commercial interests of the individual university. To ensure, for instance, a range of teaching offerings in areas in which we have a national interest -- so, the teaching of Indonesian as an example already noted -- we should not be dependent upon individual universities stepping up to the plate. There are examples, to be sure, where strategies towards maintaining subjects of low enrolment that are of national importance have been negotiated between individual universities: cross-credit for language courses at UQ and QUT, for instance, and for the humanities and creative arts among members of the RUN. However, this is ad hoc and reliant upon individual universities or groups of universities seeing such activity as in their interests -- not something we can depend upon.

There is an urgent need for a national coordinating body to manage how our university system serves our national interests in both teaching and research. While there has been repeated interest from government in thinking about that kind of coordination in relation to research through strategies such as the various iterations of the national research priorities, these have tended to be short term, inevitably politicised, and subject to the lobbying of particular interests and the vagaries of intellectual fashion. Crucially, they have not been independent of government.

The Tertiary Education Commission that operated from the last 70s into the 1980s is an example of an independent body that provided oversight of the sector, but it only provided advice on funding. The kind of independent universities commission needed now must provide more than advice on funding. It should provide a mechanism for coordinating the activities and missions of the universities in a manner that serves the national interest in the long term, and acts as a moderating influence on the tendencies towards market concentration that have produced the contemporary situation. It could look at such things as the patterns of offerings, their range and quality, and geographic spread; the state of the disciplines and strategies for support, development or management; the monitoring of the system’s success in attracting students from low SES or otherwise disadvantaged backgrounds; the management of a national system of cross-credits and other strategies to maximise access to the full range of subjects offered nationally; the connection between teaching programs and research activity; and the regulation of training initiatives such as internships and placements. It could serve as the place where Australia can determine what it wants the university system to do, providing the non-partisan articulation of the national interests the system should be set up to serve, and establishing processes through which the interests of the nation and the universities can be aligned, managed and their operations coordinated.

**Q38.** The working conditions of academic staff have suffered considerable deterioration, partly as a result of the changes during COVID. The requirement to provide courses on multiple platforms, online and face to face, the increased demand for consultation via emails and social media, as well as the increases in administrative activity and research management, have added dramatically to staff workloads. The cutting of staff numbers in all universities have added to these pressures. In many universities, entitlements such as study leave have been wound back and reconstituted as privileges. As noted earlier, casual staff have been used to fill the gaps here but the precarity of their status and their limited involvement in staff development means that we are burning out the next generation of staff. While there is clearly not much interest in this within government, or perhaps within the wider community, the role of the academic is increasingly unattractive as a career option. There needs to be a proper analysis of how academic workloads have increased, a coordinated strategy for dealing with situations where this is unacceptable, and regulatory intervention that takes these issues out of the area of industrial relations bargaining and places them within the stipulated standards of employment conditions in the sector. As is the case with our teachers and nurses, the deterioration of workplace conditions and the burnout of existing staff places the country at serious risk of not being able to staff these institutions properly in the future.

**Q41.** There is a question of how much more we need to do to assess research quality, at least in the short term. The ERA has done its job for the moment in lifting the national research performance in terms of quality and outputs. In that respect, it has been a great success. There is little need for it to keep happening every three years, however. The opportunity cost for individual researchers and for the institutions is high, and we are now experiencing diminishing returns on that investment. If it was to be reactivated, however, it really does need to be significantly renovated. The structure of the ERA, with its focus on disciplines rather than individuals or organisational units, created a number of problems. The focus on disciplines laid it open to high levels of gaming as outputs were moved around the discipline codes to seek advantage. At the university level, it was difficult to disaggregate the outputs used to generate the rankings and thus to use the rankings to drive funding to organisational units or individuals. However, its focus on assessing excellence rather than extrapolating quality from income was an important corrective to other ways of assessing research.

For disciplines using peer review, the pool of qualified assessors is more shallow than we might like to admit, the universities often put junior and inexperienced staff forward as reviewers rather than more senior and more experienced staff, and so the quality of assessments was highly variable. With the ERA reviews process often running alongside the standard ARC programs, the demand for reviewers outstripped the supply of qualified personnel, something which also affects the Discovery program within the ARC.

The Impact assessment was in my view poorly designed and ultimately a waste of time. I was a member of the technical working group setting up the indicators for this exercise and it was very clear that the privileging of income as a proxy for impact radically skewed the process towards certain areas of the sciences. There was little support for that indicator within the discussion in our working group, but it remained in place nonetheless. The design of the process, while certainly seeking expert input, was in the end unduly responsive to political influence. What emerged was particularly unsatisfactory for the non-STEM disciplines. There were no indicators at all that could accurately assess the impact of most of the humanities and some of the social sciences disciplines. The institutional narratives that were provided served as some kind of backfill for these disciplines, and they were useful for as promotional vehicles for the institutions, but they fell well short of constituting reliable evidence.

There may be a case for a periodic review of research quality at reasonable intervals (five years?), drawing upon the data collected in university research repositories which are probably now in reasonable shape for such a task. Much of the task could be done via the metrics generated from this information, with some smaller element of peer review in disciplines which seek that element and which are not properly accommodated through platforms such as Scopus. But the scale of peer review required by ERA is simply unrealistic, it is performed inconsistently, and the volume of work involved for the panels is daunting. It is also worth saying that one of the key outcomes of the ERA -- the increased internationalisation of Australian research networks -- means that it might be worth revisiting the idea that the quality of the outlets in which researchers publish might serve as a proxy for quality (although we need to learn the lessons of the notorious ‘journals list’ exercise and find another way of doing this -- maybe this is what peer review could tell us at the point of assessment). When ERA was initiated (and, before it, the RQF), government demanded evidence about research quality for political reasons; that seems less urgent and necessary now. Most disciplines themselves have relatively strong systems of evaluation and perhaps we can rely more on them for the short-term future and take some time in assessing the effectiveness of the various versions of research assessment that are now in mature stages of development elsewhere.

**Q47.** I have discussed some aspects of funding for teaching earlier on, so I only want to address the current approach to research funding here. In the humanities, the introduction of the medicalised model of research that occurred with the establishment of the ARC demanded some retrofitting of humanities, some social sciences, and even some science (maths, for instance) research to meet the criteria for eligibility. In the case of the humanities, the one-size-fits-all model of research funding has had the effect of greatly increasing the cost of humanities research as budgets were inflated to come up to the cut-off levels required for eligibility. The humanities would have been better served by a graduated scale of research funding, starting from quite small grants or start-up investments. An earlier system in which a certain amount of the block funding to the university went on a per capita basis to departments or schools was a better fit for the needs of many early career researchers who now find themselves competing unsuccessfully to be one of the very few to pick up a DECRA or a Discovery -- against the competition from much more senior researchers (this, even at DECRA level).

The ARC model does not work well for my disciplines. A significant amount of valuable work could be done without the large investment the Discovery program requires, the deployment of peer review is compromised by the low success rates and the consequent improbability of differentiations between applications of high quality (say, when we must place the cut-off between those scoring in the top 18% and their next nearest competitor), and by the limited pool of assessors and members of the College of Experts with the requisite mix of disciplinary knowledge and experience. At present the success rates are so low, and the outcomes increasingly contestable, that there are diminishing rewards for staff who agree to undertake the task of applying. Nonetheless, there is continual pressure from the universities on their staff to submit applications, notwithstanding their remote chances of success when the vast majority of applications fail. This is a waste of resources -- for the staff member concerned, for the university’s research support staff, and for the ARC. We need a better way of funding high quality research and supporting the development of Australia’s research workforce.

A root and branch review of the system might consider a number of alternatives. It could reinstate some of the earlier local block funding investment at university level rather than through the national research funding instrument to fund smaller projects. Australia could set up a national research funding structure that was more like the British system, which is designed more closely in accord with the needs of specific discipline formations through the establishment of separate funding authorities for cognate groups of disciplines. These could operate smaller scale and more targeted or graduated packages of funding as well as something like the larger projects which now dominate the ARC’s list of funded applications. A closer fit between the model of research appropriate to the disciplines and the process through which funding is allocated is necessary.

**Q49.** The JobsReady package was established under the influence of two premises. One was that the disciplines whose costs were increased were disciplines in which graduates experienced greater difficulty finding employment: so, it was held, humanities graduates had less success in finding employment than those in the sciences. The second was that increasing the cost of certain degrees would impact upon student choices and drive student preferences towards those areas the government wished to boost. Both of these premises were incorrect. Humanities graduates do not find it harder to secure employment, and raising the HECs debt on courses has proven to have little effect on the choices that prospective students make about their enrolment or careers. Given these incorrect founding assumptions, and given what is emerging as the disproportionate and unforeseen effect of this package upon, in particular, women, there is no obvious reason why government should persist with a strategy that was ill-informed at the outset and seemed also to have been influenced by political preferences about, for instance, the value of the humanities. It should be completely discarded as an inappropriately motivated intervention into the sector’s funding which has failed to achieve its objectives.