

SCIENCE & TECHNOLOGY AUSTRALIA

POLICY SUBMISSION

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AUSTRALIAN TERTIARY EDUCATION COMMISSION

Science & Technology Australia thanks the Department of Education for the opportunity to respond to the Australian Tertiary Education Commission (the Commission) implementation [consultation paper](#).

Science & Technology Australia is the peak body for the nation's science and technology sectors, representing nearly 140 member organisations and more than 225,000 scientists and technologists. We connect science and technology with governments, business and the community to advance science's role in solving some of humanity's greatest challenges.

Key points

- Science & Technology Australia is deeply concerned about the lack of attention given to university research in the proposed Australian Tertiary Education Commission design.
- Failing to properly support Australia's university research sector threatens to undermine our nation's research capability and future productivity.

Science and Technology Australia Recommendations:

1. The proposed Australian Tertiary Education Commission's remit must clearly acknowledge research as one of universities' two critical roles. 'Research' must be included in the Commission's name – potentially 'the Commission for Tertiary Education and Research Australia (TERA)'.
2. The proposed Commission should have a clear remit for improving a focus on education and research outcomes and workforce culture, including how measures of success and impact influence research careers.
3. The agency's structure must be reconsidered, with three full-time commissioners - including a commissioner for research - and interactions with and beyond the higher education sector.
4. Appropriate resourcing must be allocated so that the agency can properly manage and advise on research policy, programs and funding.
5. The list of 'consulted officials' must be broadened to ensure all other parts of the Australian Government that affect – and are affected by – university research are included.

Australian Tertiary Education Commission role and remit – where is research?

Australian universities perform two critical, complementary and integrated roles. They deliver education – predominantly Bachelor degrees, but also postgraduate coursework and other undergraduate level courses – to deliver the skilled workforce Australia needs to prosper. They also carry out research – generating new knowledge to drive the critical early stages of innovation and invention that can lead to massive breakthroughs and discoveries. In turn, these lead to knowledge translation, commercial products and many direct business startups. This is done through higher degrees by research (HDR) and beyond.

Throughout the Universities Accord process, the panel had a strong focus on addressing issues regarding undergraduate education and improving university access, participation and completion for

more Australians. These are worthy goals, but universities' second crucial role— research — must not be treated as an afterthought.

The two roles are inter-related. Most academic staff in universities are research active. According to the [Department of Education 2023 staff data](#), of the around 50,000 (FTE) academic staff across Australia's universities, more than half (53.6%) were in research and teaching roles. Around one third (33.8%) were research-only positions, and only 11.5% were teaching-only positions. A high-quality learning environment is enriched by these world-class researchers, who teach, guide and challenge students in their studies. Given the rate of change with technology, knowledge, and society, education no longer relies on textbooks, but on knowledge and expertise that is current — delivered by our excellent researchers. This is why many universities prioritise a 'research-driven teaching' objective in strategic plans.

These researchers operate in a competitive and globally connected workforce, and seek out universities where their career can flourish. High-quality research (and by virtue research funding, processes and infrastructure) is a key driver of university rankings, which impact our education institutions' international reputation — in both research and education — and appeal for business partnerships and industry collaboration. A poorly resourced or mis-focused Commission that fails to be an effective 'steward' for research could fundamentally misunderstand and undermine both our research and education systems. Our university research credibility drives international standing, teaching quality, and industry engagement.

Indeed, the consultation paper notes the proposed Commission will be a 'steward for the tertiary education sector'. The key word here — and indeed, in the Commission's title — is 'education', and the paper continues the Accord's strong focus on undergraduate education issues. The challenges the Commission is being proposed to solve (p1) and the system improvements (pp6–7) predominantly deal with undergraduate education — the references to research are few, and perfunctory. Simply referring to the 'system' or the 'sector' as a catch-all is not sufficient to grasp, nor address, the research system's nuances and complexities, how it interacts with university undergraduate teaching, and the policy settings needed to secure our university research capability.

The Commission structure and title

While the paper proposes the Commission would have a Chief Commissioner, two part-time Deputy Commissioners and a part-time First Nations Commissioner, their remit and responsibilities are unclear. It is also unlikely this structure would deliver sufficient capacity to properly address all higher education and research policy and program administration issues.

For the Commission to properly manage education *and* research policy, it would be necessary to revise the structure and establish three full-time Commissioners — one to oversee higher education, one for research and one for international and cross sectoral issues — as well as the part-time First Nations Commissioner. Appropriate departmental resourcing must be allocated to support this — without it, the Commission risks just being window dressing.

It is also necessary to change the name, to properly acknowledge that research is part of universities' role for the nation. The Commission for Tertiary Education and Research Australia — TERA — could be an appropriate title.

University research interactions with other Australian government programs

Further, the proposed list of 'consulted officials' fails to recognise the extent of university research interaction across other areas beyond (but also within) the Education portfolio. While the Australian Research Council (ARC) is an important funder of university research (at various stages of discovery and translation) and small-scale research infrastructure (via the LIEF program), there are several other significant funders and programs critical to university research, or which university research is critical to:



- The National Health and Medical Research Council (NHMRC)
- The Medical Research Future Fund (MRFF)
- Australia’s Economic Accelerator (AEA)
- The National Collaborative Research Infrastructure Strategy (NCRIS)
- Industry-building initiatives, including Cooperative Research Centres, the Industry Growth Program, National Reconstruction Fund (NRF) and Future Made in Australia (FMiA)
- The Australian Defence Science and Universities Network (ADSUN), AUKUS and related activities.

The NHMRC and MRFF fund a huge proportion of university medical research and are critical to any discussions of research policy. The AEA is an important program supporting university research commercialisation with the potential to transform university research impact. NCRIS is a critical program that underpins Australia’s research infrastructure – our research capability would be severely compromised without it. Neglecting to acknowledge these programs is a concerning oversight and does not bode well for retaining effective policy development capability – or funding security – for these important schemes.

Alignment with Strategic Examination of R&D

Another recommendation from the Universities Accord Final Report was that the Government undertake a strategic examination of the R&D system, which was announced in the 2024–25 Federal Budget. Science & Technology Australia expects this examination will take a whole-of-government approach in considering how best to support Australian research. This includes the critical discovery work done in our universities, and how universities interact with all other parts of the research and innovation system – which extends across 14 Australian Government departments and agencies. Until this examination, and the Government’s response, is complete, it would be prudent to retain current arrangements for research policy and programs in the existing area in the Department of Education. It will be critical to ensure that the Commission’s design, resourcing and capability is able to be responsive to the Strategic Examination’s findings. Establishing a Commission that is poorly equipped to manage university research settings runs the risk of potentially undermining the Examinations recommendations.

If research policy and programs are to be properly handled through the Commission, a much more thorough approach – and a deeper appreciation for the national importance of research – than is afforded in the consultation paper must be taken. Science & Technology Australia is deeply concerned that the overwhelming focus on undergraduate higher education issues evident in the consultation paper threatens to dominate the Commission’s priorities, focus and resourcing. This could jeopardise the ongoing stability of Australia’s university research policy settings and programs, to the severe detriment of Australia’s research capability.

Research workforce

As acknowledged by the work of the Australian Chief Scientist and the National Science and Technology Council, there are challenges in maximising Australia’s research workforce. Key issues are researcher mobility between universities and industry and supporting diversity across all levels of the research workforce.

Closely tied to these issues are the ways the sector measures merit and impact, which influence universities’ approaches to recruitment and promotion, across academic (including post-doctoral and casual staff), professional and technical staff (including research infrastructure staff). The Commission should have an important role in setting measures of success and impact, and supporting a positive and strong workforce culture.

Please do not hesitate to be in contact if we can provide any further advice or information.



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