Charles Sturt University

SENATE EDUCATION AND EMPLOYMENT LEGISLATION COMMITTEE

Inquiry into the Higher Education Legislation Amendment (Provider Category Standards and Other Measures) Bill 2020

23 October 2020

Office of the Vice-Chancellor
Charles Sturt University

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Senator the Hon James McGrath
Chair, Senate Standing Committee on Education and Employment Legislation Committee
PO Box 6100
Parliament House
Canberra ACT 2600

Dear Chair

On behalf of Charles Sturt University, I am pleased to provide this submission to the Senate Standing Committee on Education and Employment Legislation Committee for its inquiry into the *Higher Education Legislation Amendment (Provider Category Standards and Other Measures) Bill 2020*.

Charles Sturt is Australia's largest regional university, with more than 43,000 students and approximately 2,000 full-time equivalent staff. We are a unique multi-campus institution with campuses at Albury-Wodonga, Bathurst, Canberra, Dubbo, Goulburn, Manly, Orange, Parramatta, Port Macquarie and Wagga Wagga, as well as various study centres located throughout regional and rural south-eastern Australia.

The University's commitment to the inclusive, sustainable and prosperous development of rural, regional and remote Australia is informed by our unique research focus and the partnerships we have formed with our campuses' local communities, industries, businesses, and with the broader regions we serve.

It is from our perspective as a large, regionally-based university with strong community and industry ties that Charles Sturt has considered the proposals for changes to the Australian higher education Provider Category Standards (PCS).

Charles Sturt made submissions to the previous reviews and consultations that led to revision of the PCS, including the 2018-19 review led by Professor Peter Coaldrake OA and the consultations earlier in 2020 by the Higher Education Standards Panel (HESP). It is the latter that is the focus of our submission to the Committee (see Attachment 1).

HESP proposed revisions to the PCS including the key elements of the bill under consideration by the Committee. The Panel also put forward proposals on the Threshold Standards that will be determined by the Minister and set out in a legislative instrument. The Threshold Standards will include performance requirements relating to research that will increase over time. For universities, and for higher education providers aspiring to university status, the performance expectations relating to research are key.

Charles Sturt would like to draw the Committee's attention to three issues raised in the HESP consultation paper in its discussion of research and research performance.

1. HESP, drawing on the prior review, proposed draft criteria for the 'Australian University' category that included the following:

   To be registered and remain registered in the 'Australian University' category, the higher education provider … from 1 January 2030, undertakes research at or above one or both of the benchmark standards … that leads to the creation of new knowledge and original creative endeavour in … at least

three, or at least 50 per cent, of the broad (2-digit) fields of education in which it delivers courses of study, whichever is greater …[1]

The Panel indicated further that "TEQSA will use existing national benchmarking exercises where they are available." This is likely to include Excellence in Research for Australia (ERA), the national research evaluation framework administered by the Australian Research Council (ARC).

2. HESP noted that transition arrangements would be required:

   to accommodate the movement of existing Australian Universities to the changed requirements of the new 'Australian University' category, particularly with regard to new research benchmarks

   and suggested that for some existing higher education providers the transition arrangements could include:

   a period of five years grace before they will be held accountable against increased requirements under the new provider category standards.[2]

3. The Panel noted that the Government's response to the Coaldrake Review:

   recognised that 'consideration will need to be given to the design of the research benchmark standards to ensure that they do not … unfairly penalise smaller universities including those operating in regional, rural and remote locations.'

   HESP supported this undertaking.[3]

In Charles Sturt University's submission to HESP, attached, the University expressed support for the proposed reduction in the number of provider categories and, in general, the revised provider category titles and descriptions, noting that the new framework will be simpler, clearer, and, in time, will enable greater differentiation between different types of higher education providers.

Our submission also addressed the need, expressed by the Panel, for flexibility in the implementation and operation of new Provider Category Standards, especially in relation to current higher education providers and in recognition of their different characteristics, missions and profiles.

We also observed, however, that the work of the Coaldrake Review and subsequent work by the Higher Education Standards Panel had been undertaken before the onset of the COVID-19 pandemic, a development neither could have foreseen and one with significant impact on the higher education sector and Australia as a whole.

In response, Charles Sturt suggested that the implementation of the new PCS might need to occur over a longer time frame than proposed in the consultation paper, in part to allow higher education providers, funding agencies and regulators time to adapt to the what was likely to be a very different policy and funding landscape in the wake of the pandemic.

We noted further that the uncertainties caused by the pandemic mean that some higher education providers might not be able to meet the baseline performance expectations for research without support in the form of structural adjustment funding, and suggested in particular that the Government consider options to re-balance the distribution of public funding for university research, which has, historically, been distributed on the basis of policy settings and metrics heavily skewed towards large, metropolitan universities.

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[1] *Amending the Higher Education Standards Framework: Provider Category Standards*, pp. 32-33
[2] *Amending the Higher Education Standards Framework: Provider Category Standards*, p. 20
[3] *Amending the Higher Education Standards Framework: Provider Category Standards*, p. 15

Since making that submission there have been four developments with profound implications for the PCS:

1. The impact of COVID-19 on higher education has become much clearer.

   Many universities are facing substantial reductions in revenue, leading to restructures, changes to course offerings, and the loss of staff with concomitant impact on research capacity.

2. The Government announced (and has begun implementation of) the Job-Ready Graduates package, one of the most significant reforms to higher education funding in decades.

   Central to the issue at hand is the effective separation of funding for research from funding for teaching and learning.

3. The policy and funding framework for university research beyond 2021 remains unclear.

   While Job-Ready Graduates included some a commitment to provide some additional research funding for regional universities, and the Federal Budget on 6 October included an additional $1 billion in research funding in 2021, to be distributed across all universities, future arrangements will depend both on the advice of the Research Sustainability working group established by the Minister for Education, the Hon. Dan Tehan MP, and the wider budget environment.

4. The Australian Bureau of Statistics, the ARC and other concerned bodies have finalised revisions to the Australian and New Zealand Standard Research Classification (ANZSRC).

   While the update is welcome, it means that universities and other research organisations must now map their research activities from the old framework to the new one – an essential task if they are to establish their two-digit performance benchmarks for the new PCS.

   The revised ANZSRC codes will also be used in the next ERA assessment, due in 2024.

Charles Sturt suggests to the Committee that these changes reinforce the core points of our submission to HESP: that universities will need time to adjust to the new PCS – perhaps more time than was envisaged by the Panel – and on-going funding to at least maintain research capacity over the next few years. This should include funding targeted specifically at regional universities in recognition of their vital role in regional communities and in supporting regional industries.

With these issues in mind, Charles Sturt suggests that the Committee include the following in its recommendations on the *Higher Education Legislation Amendment (Provider Category Standards and Other Measures) Bill 2020*:

1. the new Provider Category Standards should not come into effect until funding arrangements for university research beyond 2021 have been finalised and implemented;
2. the Government and TEQSA commit to using the results of the 2024 ERA assessments to establish a baseline for university research performance for the purposes of the Threshold Standards;
3. in keeping with the time frame proposed by HESP, higher education providers that do not meet the Threshold Standards for research set out in the PCS will have a 'grace period' of five years from the release of ERA results before they can be held accountable against the new requirements; and
4. the time frame proposed by HESP in relation to the research requirements (1 January 2030) should be adjusted to take into account the impact of COVID-19 and the uncertainties around funding arrangements beyond 2021; that is, that the higher performance standards should some info effect from 1 January 2032 at the earliest.

Charles Sturt University would be more than happy to provide further information to the Committee on the implications for regional universities, their students and other stakeholders of the *Higher Education Legislation Amendment (Provider Category Standards and Other Measures) Bill 2020* and other changes to the policy and funding framework for higher education.

Yours sincerely

Professor John Germov
Acting Vice-Chancellor

Encl: Attachment 1 - Response to HESP consultation paper, 14 April 2020

Charles Sturt University

Charles Sturt University

Response to *Amending the Higher Education Standards Framework: Provider Category Standards*

Higher Education Standards Panel Consultation Paper

14 April 2020

Charles Sturt University supports the proposed reduction in the number of provider categories and, in general, the revised provider category titles and descriptions. The new framework is simpler and clearer than the current six categories, and in time will enable greater differentiation between different types of higher education providers.

The goal of ensuring the PCS "remain appropriate to the needs and expectations of students, the sector and the wider community' would be best achieved if the Government, TEQSA and the Higher Education Standards Panel (HESP) retain a flexible approach to the implementation and application of the new provider standards, in keeping with the spirit of the Coaldrake report and the Government's response to its recommendations.

The need for a flexible, perhaps even cautious, approach to the implementation of the new PCS has been underscored by recent developments. Since the release of the consultation paper the way ahead for Australian universities and other higher education providers has become much more uncertain. The coronavirus pandemic has had, and will continue to have, a significant impact on the sector.

For example, the pandemic has led not only to a sharp reduction in the number of international students enrolled with Australian higher education providers, with concomitant effects on institutional revenue, but to an increase in competition for domestic students, especially under a cap on Commonwealth Supported Places. Other impacts of the pandemic are less clear, and cannot easily be planned for or managed.

It is likely, then, that some Australian universities will face significant financial challenges over the next few years. Reduced resources and a loss of experienced staff may affect their capacity to adapt to new regulatory or reporting requirements. TEQSA itself may experience similar challenges.

Charles Sturt University therefore suggests that the implementation of the new Provider Category Standards may need to occur over a longer time frame than proposed in the consultation paper, for two reasons.

First, it appears unlikely that the legislative instruments for the new PCS will be made by mid-2020, as indicated in the consultation paper.

Second, existing higher education providers, funding agencies and regulators will need time to adapt to the post-coronavirus situation.

In particular, the uncertainties caused by the pandemic mean that some providers may not be able to meet the expectation that they undertake "research at or above world standard in at least three or 50 per cent of the broad fields of education offered" by 2030. Given the extreme uncertainty over economic futures and funding at present, we do not believe the Government should commit to this reform.

However, the Government's response to the Coaldrake paper confirms its support for the recommendation for a gradual increase in performance standards, and notes that universities will need time to build, or re-build in the post-coronavirus era, the required research capacity. Given the uncertainties mentioned above, if

the Government is committed to the timetable set out in the consultation paper it should consider providing structural adjustment funding for Australian universities to ensure that the higher performance benchmarks are met by 2030.

Charles Sturt University also suggests that TEQSA and the Government consider refining the requirements for greenfield providers. While some competition between providers is useful, there is little value in having a new provider duplicate the kind of course offerings available elsewhere in region in which they intend to operate. New providers should be encouraged to focus on clear gaps in the wider higher education system.

Introducing new standards and new performance benchmarks, and a more strategic approach to the entry of new providers, would give existing Australian higher education providers time to recover from the shocks resulting from the coronavirus pandemic and for the Australian higher education system as a whole to regain some stability. It also offers an opportunity for TEQSA and the Government to ensure that domestic and international stakeholders and partners understand the aims of the new provider categories. In a time of uncertainty across the global higher education landscape, there is an increased risk of reputational damage for individual providers – and for the Australian higher education sector as a whole – from wholesale changes to categories, definitions and standards when the changes are not well understood outside the Australian higher education sector.

The risk is even greater when a provider is assigned to a category with performance standards that are, or are perceived to be, lower than was previously the case, or when the regulator imposes conditions on the registration of a provider – especially if those conditions relate to a provider's research efforts, which are a major factor in institutional rankings.

Charles Sturt University therefore strongly supports Recommendation 9 from the Higher Education Provider Category Standards Review: the Government, TEQSA and other Australian higher education peak bodies must make efforts to communicate the intent and effect of the changed PCS to international partners, including governments, funding and regulatory bodies. In addition, during the transition period for the introduction of the new PCS, conditional registration should be imposed only as a last resort.

Finally, a cautious approach to the implementation of the new PCS will mean that more thought can be given to ensuring the standards recognise and support the different types of providers already operating in Australia, and the different types of providers existing within each category – again in keeping with the original report from the Coaldrake review (p26).

That report raised the option of strategically targeting some providers to ensure that the Government's goals for higher education and research are being met – particularly in regional areas (p26), and especially in relation to economic opportunity, access to services, and attracting and retaining a professional workforce (p10). The same point is acknowledged in the Government's response to the report, which likewise recognised the need to ensure performance benchmarks, particularly around research, do not disadvantage universities operating in, or serving, regional, rural and remote areas (p8). This is an important matter for Charles Sturt University: as a public institution we work in partnership with regional communities who expect that a fully-fledged University will be actively contributing to their needs and goals.

These issues are not explicitly addressed in the Higher Education Standards Panel consultation paper. Charles Sturt University sees this as an opportunity rather than an oversight, and offers the following responses to the 'Questions for consideration' as an initial step towards ensuring the revised provider categories and standards support the different strengths, profiles, missions and capabilities of Australia's universities, and meet the needs of all Australians.

Responses to 'Questions for consideration'

1. Amendments to the Provider Category Standards (Part B1)

Question 1: Does the revised description of an 'Institute of Higher Education' in Appendix C B1.1, provide sufficient clarity for providers seeking to enter the category?

The description provides clarity for existing Australian providers that may be seeking to enter the category. For new entrants, however – particularly those without a track record in research – it would be useful for TEQSA to develop, in consultation with other providers, some guidance on what constitutes 'scholarship' – possibly drawing on the discussion in the Coaldrake report.

Question 2: Do you foresee any implementation issues in creating the new 'University College' category?

TEQSA and HESP may need to develop a stronger justification for the proposed requirement that a provider in this category "has authority to self-accredit at least 70 per cent of its total courses of study, at the time of application to TEQSA". This is a high threshold for a provider to achieve before seeking to enter the category, especially in combination with the requirement for "a history of at least five years of successful delivery with strong student outcomes." The latter is also part of the requirements for the 'Australian University' category, which represent a higher standard of quality and capability.

Further, TEQSA and HESP may also need to develop guidance for new providers on what constitutes "mature and advanced processes for the design, delivery, accreditation, monitoring, quality assurance, review and improvement of courses of study, and the maintenance of academic integrity", perhaps drawing on examples from established higher education providers.

Question 3: Are the requirements in the new 'University College' category in Appendix C B1.2 sufficiently clear and appropriate to uphold quality and facilitate institutional progression?

The requirements in the new 'University College' category represent appropriately high benchmarks relative to the 'Institute of Higher Education' category, while still offering the potential for a provider to transition to the 'Australian University' category.

Charles Sturt University suggests further that the 'University College' category should only be used for institutions that intend to become an Australian Universities, and are likely to meet the relevant benchmarks.

Moreover, since the current 'Australian University College' category contains a number of different types of higher education institutions, some care will been to be taken in re-assigning current providers to new categories, and especially to the new 'University College' category, to avoid sending confusing signals to the domestic and international student markets.

Question 4: Is there sufficient clarity for providers about the distinct requirements in the revised 'Australian University' category for providers offering courses of study in three or more broad fields of education versus those with a 'specialised focus' (Appendix C B1.3)?

Charles Sturt University strongly endorses the inclusion of civic leadership, engagement with local and regional communities and a commitment to social responsibility in the draft criteria. We see this as a core function of all universities, especially those based in regional Australia.

The University suggests that TEQSA and HESP may need to provide greater clarity on the following five points:

1. The distinction between the requirements for a 'University College' and an 'Australian University', especially in relation to track record, student outcomes, processes, systems and practices (criteria 4-10 for 'University Colleges' and criteria 7-13 for 'Australian Universities').

   Greater clarity would support new or aspiring entrants in their decision to seek registration as a 'University College' or as a specialised focus Australian University.

2. The criteria as set out in the discussion paper require an 'Australian University' to have 'the support of the relevant State, Territory or Commonwealth government for its application for registration'.

   This introduces the possibility of conflict between different jurisdictions: a state or territory government may not support the application for a variety of reasons, but be over-ruled by the Commonwealth. Charles Sturt University proposes that Commonwealth support alone should be insufficient for registration, but necessary for any new Australian University which seeks to operate in multiple jurisdictions and/or access to Commonwealth funding.

3. For new 'specialised focus' entrants, TEQSA should take into account the number of higher education providers already offering courses in the proposed fields of activity for the new institution.

4. The criteria around Doctoral Degrees admit the possibility, however remote, of an existing provider being removed from this category if it is not actively delivering these degrees (i.e. has students enrolled in) 'in at least three, or at least 50 per cent, of the broad (2-digit) fields of education in which it delivers courses of study'.

   This can be addressed with a small modification to the criteria:

   *The higher education provider … **can deliver** Doctoral Degrees (Research) in*

   a. *at least three, or at least 50 per cent, of the broad (2-digit) fields of education in which it delivers courses of study, whichever is greater; or*
   b. *all broad (2-digit) fields of education in which it has authority to self-accredit courses of study in the case of a university with a specialised focus …*

5. As noted above, there is a strong argument for a more cautious approach to the implementation of the new PCS and associated standards.

   It is becoming clear that for 2020 the performance of some Australian providers may not reach the levels of recent years, due to a combination of lower enrolments, lower incomes, ongoing uncertainty and likely staff reductions. In particular, this means that some providers may not be able to meet the gradually higher research benchmarks, as it will take some time to rebuild capacity.

   Charles Sturt University therefore suggests that TEQSA and the Government should not implement the recommended requirement for Australian Universities to undertake research at or above world standard in at least three or 50 per cent of the broad fields of education they offer until such time as the long-term prospects for Australian and international higher education become clearer.

Question 5: Do you consider the research benchmarks outlined in Appendix C B1.3 (16) (i.e. that research be 'world standard and/or be of national standing in fields specific to Australia') appropriate for the revised 'Australian University' category standard?

Yes, subject to caveats below.

Charles Sturt University notes the panel's intention to make the criteria "clearer for different provider cohorts depending on their stage of maturity". This suggests the research benchmarks may differ for different providers within the same category. This flexibility is welcome but should not be limited to new providers, or to established providers seeking to register in a different category.

We also note the panel's support for the statement in the Government's response to the Coaldrake review that "consideration will need to be given to the design of the research benchmark standards to ensure that they do not discourage research specialisation that is in the national interest, or unfairly penalise smaller universities including those operating in regional, rural and remote locations."

Charles Sturt University suggests that the provisions for 'fields specific to Australia' may be as relevant for established providers as potential new ones. For example, the agricultural research carried out at Charles Sturt – which has been consistently related as 'above world standard', and pertinent to the challenges facing other agriculture sectors around the world – is very much focused on the needs of Australian farmers and the challenges of agriculture in Australian environments. It is this type of 'national interest' research that should not be disadvantaged by an overemphasis on global rankings and citations, rather than local value and impact.

The discussion paper also mentions that "TEQSA will use existing national benchmarking exercises where they are available. Where they are not available, TEQSA will benchmark against standard indicators" (point 14, p14). TEQSA and the Government will need to take care to ensure that this does not lead to an additional expensive and time consuming reporting burden for universities.

Further, the focus on engagement with community, industry and employers in the revised standards suggests that the ARC's Engagement and Impact Assessment (EIA) may form part of the evaluation framework. TEQSA and the Government will need to provide more information to all providers on how this will happen.

In addition, TEQSA will need to provide clarity for new entrants not only on how 'world standard' is measured, but also who is doing the measuring.

Question 6: What factors should TEQSA consider in determining whether the research at an Australian University is 'world standard', in particular where an existing benchmarking exercise, such as the ERA, is not available?

TEQSA could employ a range of metrics to evaluate the research of a provider that has not participated in ERA. Publications in peer-reviewed, refereed or otherwise high-standard outlets should always be part of the mix, as these are standard performance indicators for research. Other options include:

- End-user uptake of research;
- Engagement with industries, communities and local groups in the regions in which the provider operates;
- Endorsement by relevant independent bodies such as the Learned Academies, professional organisations such as Engineers Australia or medical colleges;
- Esteem factors, such as researchers' membership in Learned Academies or professional organisations; or
- Research income – for example philanthropic support, HERDC categories 2 and 3, and non-ARC or NHMRC competitive grants.

TEQSA may wish to consider further consultations with existing providers and relevant peak bodies to develop a suite of metrics that could be used for HEPs that do not participate in ERA.

Question 7: On what basis should TEQSA assess whether an Australian University meets the benchmark for research of 'national standing in fields specific to Australia'?

Charles Sturt University suggests, again, that TEQSA should make use of existing metrics and mechanisms to make such assessments – for example, ERA and EIA results, other research metrics such as those mentioned above, HDR enrolments, the number of research-only staff, or measures of benefit to regional economic development, exports or the broader industry base. Different metrics will best reflect the performance and capabilities of different universities, and the benchmarks should take this into account.

For 'fields specific to Australia' it may also be useful to give some weight to publications in Australian-focused journals (for example, the *Australian Journal of Earth Science*, the *Australian Journal of Indigenous Education*, the *Medical Journal of Australia* or *Australian Historical Studies*) and other platforms that provide local impact and knowledge.

Question 8: Do the draft criteria for the revised 'Overseas University in Australia' category in Appendix C B1.4 provide sufficient clarity for providers wishing to enter the category?

Yes, subject to the caveat above regarding the impacts of the coronavirus pandemic.

Question 9: Are the requirements for industry engagement, civic leadership, and community engagement sufficiently clear in the draft standards (Appendix C B1.2 (9-10)?

The consultation paper describes that to be registered as 'University College', 'Australian University' or 'Overseas University in Australia' that an institution must:

"Demonstrate engagement with employers, industry, and the professions in areas in which it offers courses of study. This engagement may include, but is not limited to, curriculum development, professional engagement, work-integrated learning, and research partnerships; Demonstrate strong civic leadership, engagement with its local and regional communities, and a commitment to social responsibility."

It is unclear how institutions will demonstrate such engagement as specific benchmarks and/or an appropriate assessment mechanism are not provided. The existing process to measure University engagement, the Engagement and Impact Assessment 2018, is unsuitable in this context as it focussed on engagement by field of research and does not provide a true measure of institutional engagement. For example, EIA 2018 did not consider non-research partnerships, teaching and learning engagement or community use of university facilities.

Charles Sturt University is jointly leading a pilot of the Carnegie Community Engagement Classification (Carnegie) in Australia, along with the University of Technology, Sydney. Almost half of Australia's universities are involved in the pilot, as participants or observers. We expect that the Carnegie Community Engagement Classification will be available to all Australian higher education institutions in 2021.

The Carnegie is the gold standard for community engagement in the United States. It requires evidence-based documentation of institutional practice to be used in a process of self-assessment and quality improvement. The documentation is assessed by a National Review Panel (administered by the Swearer Centre for Public Service at Brown University, USA) to determine whether an institution qualifies for recognition as a community engaged institution.

Carnegie requires evidence of all engagement components in the draft Higher Education Provider Category Standards (i.e. curriculum development, professional engagement, work-integrated learning, and research partnerships, strong civic leadership, engagement with its local and regional communities, and a commitment to social responsibility). In this regard, Carnegie would be a suitable mechanism to demonstrate whether an institution meets the standards required for Industry engagement, civic leadership, and community engagement.

Carnegie is becoming a global benchmark for community engagement with Pilots in Canada and Ireland and planning underway for Pilots in Africa and Asia. The systematic, evidence-based approach to assess community engagement provided by Carnegie makes it an ideal mechanism for institutions to achieve (or work toward) the engagement component of the Higher Education Provider Category Standards.

Charles Sturt recommends that TEQSA and HESP consider adopting the Carnegie Community Engagement Classification as part of the evidence-base for these standards.

2. Amendments to the self-accrediting authority criteria (Part B2)

Question 10: Do you have any comment on the draft amendments to the criteria for seeking authority for self-accreditation (Part B2 of the Threshold Standards), described in Appendix D?

No.

3. Provisions for greenfield universities

Question 11: Do you think there should be provision for greenfield entry to the 'University College' category as a destination, as well as a pathway to the 'Australian University' category?

Yes, subject to the suggestions above on

a) developing guidance for new providers on some issues; and
b) limiting the category to providers intending to become 'Australian Universities',

and the caveat regarding the impacts of the coronavirus pandemic.

Question 12: Do you have any comments on the implementation issues associated with greenfield universities (Appendix C B1.2 (11-14)?

No, subject to the caveat stated above regarding the uncertainty resulting from the coronavirus pandemic.

4. Transition arrangements for existing providers

Question 13: Do you identify any issues of concern for providers in the Australian University of Specialisation and Australian University College categories that transition to the new 'Australian University' category—either with or without a 'specialised focus'?

No.

Question 14: Are there other aspects of the transition of providers occupying the Higher Education Provider category to the new categories that the Panel has not considered but should?

Yes. Research is central to the idea of the university, and is, rightly, an important part of the new performance standards. The new Provider Category Standards and associated research performance benchmarks offer a good opportunity to ensure that all Australian universities have the resources and funding they need to meet the benchmarks, and to improve their performance over time. However, the current policy and funding settings for research in Australia will make this a greater challenge for some universities.

ARC assessments have repeatedly shown that research at Charles Sturt University is high quality, high impact, and highly engaged with industry and the community. As noted above, our research is also characterised by a focus on meeting regional needs, but with the potential for national benefit.

Unfortunately, research funding for regional universities has grown only slowly over the past 25 years, and their share of public investment in research has declined.

The national policy and funding framework for research and research infrastructure is heavily skewed toward metropolitan universities, which tend to focus on large-scale, blue-sky research, often involving international collaborations. While this kind of research is essential – it provides the foundation for new technologies, new

industries and economic transformation – it rarely considers the real needs of regional communities and industries.

With these issues in mind, Charles Sturt University has developed a proposal to re-balance Australian research funding so that a greater share of public funding is directed towards the problems, opportunities and challenges in regional Australia. The result would be more research that is focused on solutions, and helps achieve the Government's goals for regional and national economic development and growth.

A rebalanced framework for Australian research policy and funding – including for research infrastructure – would take into account the proportion of the population living in regional areas, the economic value of regional production, the value of exports from Australian regions, and the need to promote economic diversification, population growth and sustainable development outside the major cities.

Charles Sturt has proposed an initial benchmark of 25% of Commonwealth and state research funding, awarded through transparent, competitive processes, for research in regional areas and on regional issues. This would:

- address specific regional economic problems;
- promote regional economic development and diversification;
- support the design of policies and programs to meet regional needs and promote social cohesion;
- deliver a greater stock of useful knowledge about the economic, social, and cultural context of regional Australia, and its relationship and interactions with metropolitan Australia;
- help achieve State and Federal Government goals, for example in economic development or digital transformation;
- deliver national development policies, particularly in relation health, education, employment, energy, and the environment;
- address the persistent gap between metropolitan and regional life expectancy and health outcomes;
- build scale and critical mass in research capability in regional areas;
- encourage more researchers to focus on regional opportunities and challenges;
- encourage more regional students to become researchers and innovators; and
- promote greater collaboration universities, research organisations, local communities and community groups, and all levels of government.

A similar proposal is being considered in the UK, with the explicit goal of boosting productivity, skills and innovation in regional areas. One model under consideration would re-direct research funding to regional areas based on local strengths in industry and research, with an emphasis on translational research.

Charles Sturt University suggests that TEQSA and the Government take these issues into account when planning for the implementation of the new PCS, and the way forward for the Australian higher education sector as we recover from the coronavirus pandemic. Universities will play an important role in economic and social recovery. That role needs to be recognised and supported, in ways that accommodate the different missions and capabilities of different universities and the communities they serve.