To:

Subject: Higher Education Authority Act: Submission

**Sensitivity:** Normal

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## \f0Dear Sir or Madam:

Please find some observations on the reform of the Higher Education Authority Act below. Having noted that education is mentioned 160 times against research which is mentioned 35 times, this reinforces an impression I have long had that the importance of research is overlooked in Irish policy. Please note that these observations reflect my significant experience both in academia and industry; these observations are to be regarded as my own, not these of my current institution.

The legislation will also clarify overall policy development in relation to higher education and research as the responsibility of the Minister. (p.5)

Research is transdisciplinary. It is impossible to encompass it in the remit of one Minister or Department. A definition of research in this context is needed.

The vision for the higher education system is that it provides high quality education (including research) which is innovative and adaptive to the needs of the learner, advances equality, diversity and inclusion, strengthens engagement with the wider education system and wider society, creates knowledge and maximises the contribution of higher education to social, economic and cultural development. (p.6)

I suggest you exclude research in this context. If you achieve this vision just for higher education, substantial progress will be made.

Learners have a unique insight into the effectiveness of the higher education system and it is important that their voice is heard. Does this include lifelong learners and part-time students? Where is their voice being heard at present? And who is acting on it?

Academic governance involves the oversight of teaching, learning, research and quality assurance issues. It is important that academics and students are included within academic governance.(p9)

Why are teaching and learning treated separately in this particular context? Why are research staff not given parity of esteem here?

The legislation will provide for a Board of no more than 12 members, including 1 student nomination. (p19) Will the Board include members from outside of the education profession? If you plan to make research a vital component of the HEA's remit, there should be equal membership.

The Minister when making appointments to the Board will have regard to the objective that at least 40 percent of the member of the Board shall be women and at least 40 per cent shall be men. (p20)

Assuming the Board has 12 members, perhaps 5 of each gender is more attainable than 40%?

The HEA and the HEIs have a key function in relation to both basic and applied research. It is proposed that this key function will continue. (p20)

This model has been tried and tested; its efficacy is limited. Conflating research with education in the way proposed has not proved successful. The degree to which HEIs and the HEA can display the agility required for the sophisticated research efforts needed going forward is questionable. As an example of one practical issue, why do HEIs not have a career path for researchers? Unless they do this, it is not credible to suggest they should have a crucial function. Why does the Department (of education, presumably) not insist on this? These problems are known on the ground with long; none of the main organisations have done anything about it. Will the reformed HEA now take ownership of this problem? Will the Cush Report be implemented by the new HEA?

Further work and consultation will take place with regard to the statutory basis of the Irish Research Council in the context of the totality of the research responsibilities of the new Department. (p21)

If you do not address the "totality of the research responsibilities" correctly, issues that have plagued Irish R&D will just continue. As one example, this lack of attention to research and its conflation with (higher) education is one key reason why Ireland is still dependent on its multinational sector.

Thanks for reading the above. There is a lot more that could and should be said, but this is not the forum. Kind regards