

SFI input to HEA legislative update

The HEA and the HE system should be praised for significant achievements even in the context of funding challenges:

- The quality and standard of the researchers;
- Excellence in several of the National Research Prioritisation areas;
- Early career stage researchers' quality;
- Increasing engagement with industry; and
- Increasing awareness of the impact agenda.

HEA consultation questions

1. What should be the key functions of the Higher Education Authority?

The existing general functions of the HEA are outlined in Section 3 of the Act. Other specific functions of the HEA are outlined elsewhere in the Act. The HEA is the statutory funding authority for the universities, institutes of technology and a number of other designated institutions and is the advisory body to the Minister for Education and Skills in relation to the higher education sector. The HEA also has responsibility for the effective governance and regulation of higher education institutions and the higher education system. The views of stakeholders are invited in particular on whether there are any additional functions and responsibilities that the HEA should fulfil in the future in order to support and regulate an effective higher education system. In identifying the key functions of the HEA, stakeholders views are also invited on the most appropriate level of institutional autonomy for higher education institutions in order to deliver on national priorities while balancing governance and accountability requirements, and whether the level of autonomy should be linked to the institution's performance in areas such as governance, delivering on national priorities etc.

Higher Education Institutions have three primary missions: teaching, research, and engagement (encompassing outreach, innovation, etc). SFI believes that the key functions of the HEA should align with these three missions. While research support is only one of the HEA's several activities, we suggest an increased focus on research support as a primary HE mission. The current legislation focusses on the teaching mission of the Higher Education system, at the cost of the research and outreach/innovation missions. In order to support the national strategy on research, Innovation 2020, the research mission needs to be increasingly supported by the HEA.

The research and outreach/innovation missions should be explicitly called out as general functions of the HEA in the updated legislation.

The global higher education system has become increasingly competitive; Ireland must raise its performance level. Christine Musselin argues that "competition in higher education is no longer only occurring between individuals and countries, but has become institutional, leading to a multi-level form

of competition and transforming universities into competitors". The HEA's Higher Education System Performance Framework sets out the ambition "to become the best higher education system in Europe and position Ireland as a Global Innovation Leader". It would be beneficial to set out in the updated legislation the aim both to increase the international standing of, and to increase the performance of Ireland's Higher Education Institutions.

As a small country, Ireland must be highly effective to compete globally. Collaboration and partnership among people, teams and institutions increase the chances of success. Ireland's higher education system consists of a wide spectrum of actors and stakeholders. Existing national strategies are in place which align activities, but individual priorities of the various actors can lead to suboptimal behaviours. The Irish higher education system should better collaborate, and should better message and communicate its activities to all stakeholders, national and international. These could be done while respecting the autonomy of the higher education institutions. Better alignment of higher education in Ireland would benefit all stakeholders.

2. What role should the Minister have in relation to regulation of the Higher Education Sector?

No observations from SFI.

3. Are there any related updates required to other Acts?

No observations from SFI.

4. Is a Registration model for Higher Education Institutions appropriate?

No observations from SFI.

5. Are there international models of regulation which should be examined as part of the process of updating the Act?

No observations from SFI.

6. The following are some of the areas that could be considered for updating and/or inclusion in the Act. Are there other areas which should be considered?

Designation/registration of Institutions, general functions of the HEA, Strategic Plans, governance of HEIs, penalties for governance or other breaches, appointment of Investigator, funding, withholding of funding, review and provision of relevant courses, gathering of information, improved data sharing to support more effective policy making while taking into account GDPR requirements and whether there are additional data sources that could be collated, reviews, research, links with other bodies, the Board. Views of stakeholders are invited on whether there are other areas that should be considered for inclusion in a new HEA Act.

We particularly welcome the consideration for updating and/or inclusion in the Act of: Strategic Plans; governance of HEIs; improved data sharing; and research.

In addition to improved data sharing, we support open access to research information: The HEA should continue to support the National Principles for Open Access to scientific information as stated in the National Principles for Open Access Policy Statement. Furthermore, it should support and encourage efforts by the HEIs to standardise their data and publication repositories for maximum interoperability. Ideally these open access repositories should also interoperate with the national research information system referenced below.

Also in addition to improved data sharing, a national open CV format would assist with research funding, career progression, performance analysis, knowledge transfer to all HEI stakeholders, etc. Achieving this would require very little resources to implement if the aforementioned national research information system is created.

In relation to Strategic Plans and governance of HEIs: increasing performance based funding to HEIs would allow the institutions to further differentiate their missions and improve their research and teaching performance.

In relation to governance of HEIs and research, SFI and the HEA were centrally involved in developing the national policy statement on research integrity. The HEA should continue to be a force pushing for the normalisation and inclusion of research integrity into the HEIs. The revised legislation could include improving research integrity as a responsibility of the HEA.

The system is slowly evolving to cater properly for the research mission of higher education. Despite recent efforts by the HEA to improve the situation, evolution in career structures for researchers has lagged the evolution in the national funding environment. The Department of Education and Skills has implemented improvements regarding fixed-term and part-time lecturing as advocated by the Cush report; the HEA should work with DES to clarify the career structure and progression for postdoctoral and other fixed-term researchers.

7. How should the HEA monitor compliance within the Higher Education Sector?

Consideration should be given to compliance with the Act, financial compliance, governance compliance, compliance with frameworks and codes, provision of data, appropriate sanctions for non-compliance, autonomy of HEIs etc. The views of stakeholders are invited in particular on the most appropriate model of ensuring that the higher education sector operates to the highest standards of corporate governance and any particular measures that could be considered.

Compliance monitoring is best based on high quality data. The HEA, the Irish HE system, and SFI plan their actions using published strategies in conjunction with evidence on national performance. Comprehensive evidence on what research is being carried out in the Higher Education Institutions is lacking. The HEA should implement a national research information system which tracks research activity being carried out in Ireland's HEIs. The institutions are implementing this, but in piecemeal fashion. A mandate from the HEA regarding standards, interoperability, and identifiers would resolve this problem rapidly and with relatively low cost. This has recently been achieved in other countries such as Portugal, Finland, and New Zealand.

As part of the ongoing HEA rolling reviews of institutional governance, the HEA aim to strengthen institutional governance. SFI welcomes this goal. As part of this exercise, the governance structures in the HEIs should evolve to increase the authority of the governance of SFI Research Centres. We make this point considering the scale of investment in the SFI Research Centres, and the recommendations in a recent independent review of Research Centres governance arrangements chaired by Alastair Glass.

The SFI Research Centres are driving the improvement and regularisation of the broad research support system across the HEIs, including Technology Transfer Office support, Horizon 2020 funding support, etc. The HEA should welcome and facilitate this drive towards best research support practice across the system.

8. Are there any other relevant issues which you wish to comment on?

No

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