

## COMMENT ON RESEARCH STANDARDS

SCD thanks the HESP for the opportunity to comment on the Draft Standards for Research, Research Training, and Learning Outcomes (Research Training).

SCD is broadly in agreement with the Standards set out.

However, we wish to comment on matters under the first and second headings related to the difference in circumstances for private HEPs, which do not have access to public funding and concomitant accountability.

### Draft Standards for Research

Q1. Yes.

Q2. Re point 2, 3, 5 and 6:

2. As worded, this may restrict the potential for **interdisciplinary research**, where the researcher may initially need to acquire some new expertise in a second field in order to bring two or more fields into dialogue with each other. Perhaps: 'experience and skills to undertake the research successfully'.

It also **precludes research** that is not supervised by a more senior person.

Particularly in a private HEP, without public funding, research may not ever be supervised, or need to be supervised, except in relation to a person's annual appraisal and promotion prospects or to an identified assignment given by the private HEP leadership. Research and subsequent publication in peer-reviewed forums typically happen without reference to public funding or public acknowledgment by Government. The Government cannot control (i) voluntary research that does not break ethical rules or (ii) peer-reviewed forums for the publication of research results in Australia or elsewhere in the international academic community.

**This is a major flaw in the system that we have often pointed out:** research that, in accord with TEQSA regulation, must be accepted by the national and international community as on a par with that from universities has no access to recognition by Australian public authorities because of the short-sighted system that pertains. Appropriate recognition through annual reporting to the ARC or similar would not even require public expenditure - although it would indeed be only fair to allow private HEP researchers such access on a competitive basis. As it is, individual academics in a private HEP can access public funding only indirectly, in partnership with a public university whose name covers the project.

**The wording does not, in fact, allow for all categories of provider as stated. Its effect could be to prevent good research being done outside the formal university system.**

3. Formal induction, as distinct from normal professional development, may not be relevant in private, unfunded providers: see 2 above.
5. Although staff achievements in research should presumably be recorded in updated cvs, it may not necessarily be (i) viable for a private HEP to hold copies of all staff publications or (ii) necessary when there is no public accountability. Please also note that it is a common university practice to hold only copies of book jackets and introductory pages, not whole

books, which may be expensive. The proposed approach arose years ago from a science-based scenario where articles are the main form of publication, whereas research books have a more significant place in Humanities.

SCD is happy to endorse a repository of research student outputs.

6. Formal measurement of research performance relates less readily to private HEPs, although formal benchmarking may be expected. In particular, formal aggregation (6a) should not be imposed, beyond the demonstration that a relevant research culture is being maintained. Again, it may not be possible for a HEP as such to direct research into identified key areas without public funding.

### **Draft Standards for Research Training**

Q3. Yes.

Q4. Re point 8.c:

Since formal measurement of research performance relates less readily to private HEPs (see 6 above), it follows that it is unlikely to be relevant or possible to monitor the contributions of research students according to particular institutional requirements.

### **Draft Standards for Learning Outcomes (Research Training)**

Q.5 Yes.

Q6. No suggestions.

Q7. Yes.

The 'standards for Course Design' (p. 3) are not referenced to a particular document.

**Please note comment at 2.2 above.** The establishment of Research Standards by which all Higher Education institutions are to be regulated, without differentiation, demands that the Standards themselves take into account the different and unfair circumstances of private providers, especially those not in the university category. These different circumstances pertain to:

- (i) Exclusion of private research achievements from the national research count.
- (ii) Lack of competitive access to public research funds for private providers.
- (iii) Lack of competitive access to public funding for individual research students, which demonstrably results in the loss of students trained in the private sector to public universities.

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