

9 July 2013

The Australian Collage of Theology (ACT) is grateful for the opportunity to contribute to the discussion addressing the Draft Standards for Research, Research Training and Learning Outcomes (Research Training).

The Australian College of Theology has been actively involved in research and research training since the introduction of its Doctor of Theology (ThD) in 1943. Over time it has added a research masters, Master of Theology (MTh) in 1975, a Doctor of Ministry (DMin) in 1998, and a Doctor of Philosophy (PhD) in 2011. These awards have been approved by the NSW Government, and following granting of self-accrediting status to the ACT in 2010, and by the ACT under that self-accrediting authority. Faculty of the affiliated colleges of the Australian Collage of Theology report research outputs to the Australian College of Theology, which applies the HERDC criteria to these research outputs to determine what would be a reportable HERDC output to DEEWR.

As a non-University with a long history of producing quality research and research training outputs we believe we are in a position to offer insights about research and research training that may otherwise be overlooked.

Guiding Principles

The ACT supports the guiding principles as stated by the Standards Panel with this two closely related provisos: if the same standards for research, research training and learning outcomes (research training) are applied indiscriminantly to all providers that conduct research, equity requires that all providers have equal access to research funding and research candidate support so they are not being unfairly penalised because they self-fund research and research training. Public Universities presently access funding that enables them to report data to their regulators in required formats. The standards, once in place, would see non-Universities required to submit data to the regulator (TEQSA) in formats that would require the imposition of a regulatory burden that would be unreasonable due to the financial expenditure necessary to ensure compliance.

Draft Standards for Research

Q1. Do you broadly support the proposed standards for Research? If not, why?

The ACT broadly supports the proposed standards for Research, though it seeks clarification concerning item 5.

Q2. Do you wish to make any suggestions in relation to the specific content of the standards?

If the Standards Panel is suggesting that repository identified in item 5 should be compatible with HERDC and ERA submissions, the ACT would argue that such a standard would impose an unreasonable financial burden on it, unless the ACT was able to access Federal government funding to establish such a repository.

Draft Standards for Research Training

Q3. Do you broadly support the proposed standards for Research Training? If not, why?

The ACT broadly supports the proposed standards for Research Training, with the exception of item 7.b.

Q4. Do you wish to make any suggestions in relation to the specific content of the standards?

The ACT argues that item 7.b. is a retrograde step as it limits the standing of doctoral work to 'a significant original contribution', whereas the AQF Level 10 explicitly made provision for a 'substantial contribution to a discipline or area of professional practice'. Without including this additional phrase, the doctorate could be understood to exclude those professional doctorates that comply with the AQF Level 10 requirement to be research.

Draft Standards for Learning Outcomes (Research Training)

Q5. Do you broadly support the proposed standards for Learning Outcomes (Research Training)? If not, why?

The ACT broadly supports the proposed standards for Learning Outcomes (Research Training), with the exception of item 3.b.

Q6. Do you wish to make any suggestions in relation to the specific content of the standards?

Item 3.b. would mandate that graduates of Research Training must demonstrate the capacity to scope, design, plan and conduct research projects 'in collaboration', where as previously this was not the case. In some fields of study, the predominant approach to research remains an individual approach. To mandate 'collaboration' would be an unfair imposition on researchers who will continue after their graduation to work as solo researchers. Should 'collaboration' be mandated as a learning outcome for research training, those disciplines that focus on the individual researcher, would be forced to modify their research training to fit a predetermined outcome rather than a sound pedagogical basis. This item needs to reflect discipline diversity, rather than mandate for all, what is extremely important for some.

General Call for Comments

Q7. Do you wish to make any Overall or General Comments about the form style, scope or any other aspects of the proposed set of research-related standards?

The ACT would reiterate the point made under General Principles above, that applying a uniform set of standards to all institutions engaged in research and research training is valid only if all those institutions have equal access to resources to fund their research and research training and to report compliance.

While it is helpful to apply research standards uniformly to all institutions engaged in research and research training, it would be an extension of that principle to record the research outputs of all these institutions. The University sector is not the only sector in Australia producing research outputs, but it is the only sector from which it seems the Australian Research Centre is interested in gathering research data. One major impediment to gathering all research data outputs would be the requirement of reporting data in formats compatible with the various government agencies and regulators. While this would incur an initial establishment cost for non-Universities, the data set gathered would give the Federal government a true picture of research outputs from Australian research and research training institutions. We would argue that the cost of establishing the infrastructure to report research outputs to the various Federal government agencies and regulators should be borne by the Federal government.

Graeme Chatfield
Associate Dean
Australian Collage of Theology