

ARC comments: *Draft Standards for Research, Research Training and Learning Outcomes (Research Training)*

1. The research standards (but not the research training standards) use ERA as a ‘reference point’.

This should be read in conjunction with the Guiding Principles contained within the ‘Call for Comment’ document which specify that “*Excellence in Research for Australia performance reports are not an appropriate requirement of minimum standards for research, but their use should not be precluded in a provider’s methods for demonstrating its achievements.*”

The use of ERA as a reference point is likely to be most relevant to research standard number 6 which states that

Research performance is:

- a. *monitored and reported against institutional goals, both in aggregate and by field of research*
- b. *analysed by reference to national or international comparators, and*
- c. *assessed against goals for improvement.*

2. There are potential areas of overlap between the standards and both ERA and the Compacts process.
3. Appropriately, the standards do not use HERDC as a reference point. This is assumed to be because HERDC outcomes are not available by field of research and also because HERDC is based on volume indicators which without careful normalization would be problematic in determining a research standard.
4. It is also possible that ERA could be used as a reference point for research standard number 4 which states that:

The concept of ‘research-active’ staff is defined and complied within the implementation of research policy and practices.

This research standard intersects with research training standard number 3 which states that:

Each research student is supervised by a principal supervisor who is research active in the relevant field of research, there is at least one associate supervisor with relevant research expertise and continuity of relevant supervisory expertise is maintained throughout the candidature.

5. Both research and research training standards use the ‘Australian Code for the Responsible Conduct of Research’ (the Code) as a ‘reference point’, in line with the Guiding Principle that:

The Australian Code for the Responsible Conduct of Research, Australian Government, 2007 is an important and helpful reference point for all providers.

The use of the Code as a reference point is most likely to be relevant to research standard number 1 which states that:

All research activities of staff and students, including research conducted as part of research training, are carried out in accordance with the provider’s academic governance requirements for research, encompassing:

- a. *ethical conduct of research and responsible research practice*
- b. *ownership and management of intellectual property*
- c. *research partnerships*

- d. publication and authorship
- e. resolution of allegations of misconduct in research, and
- f. compliance with prevailing regulatory requirements that are applicable to the field of research.

In addition, research training standard number 5 which states that:

Research students receive an induction about codes of conduct for research, ethics, occupational health and safety, intellectual property and additional matters that are specific to the field of research

6. There is some merit in using ERA as a ‘reference point’ for demonstrating achievement of standards, rather than prescribing a minimum ERA standard that must be met in order to comply with the standards for research-active staff or for research performance.

However, with regard to using the Code, it is of concern that the standards do not provide explicitly that compliance with the Code is a minimum requirement.

7. In this context, it should be noted that meeting the threshold standards is a requirement for the registration and re-registration of providers, and that the ‘Call for Comment’ document includes the following statement about Research and ‘Non-Threshold Standards’:

As outlined in earlier communiqués, the Panel believes that an arrangement of (regulated) ‘threshold’ and (unregulated) ‘non-threshold’ standards is not helpful. Further, the topics mooted for non-threshold standards are already represented in the current Threshold Standards, although to varying degrees and not always explicitly. For example, research and/or research training are referred to in the Provider Registration Standards (4.3, 4.4, 5.6, 7.1), Course Accreditation Standards (1.8) and throughout the Provider Category Standards.

The Panel proposes that research and research training standards are warranted in the revised Higher Education Standards Framework, while acknowledging that such standards will not apply to all providers. The same standards would, however, apply to all providers who conduct research, or research and research training, irrespective of the category of provider. Like the current Threshold Standards, the proposed research standards are intended to be the subject of regulation, i.e. they will not be ‘non-threshold’ standards.

The above position contradicts the existing TEQSA legislative framework, which explicitly provides that ‘Research Standards’ are to be ‘non-threshold’ standards (section 58 of the TEQSA Act).

8. There is also a high risk associated with the inclusion of research standards as ‘threshold’ standards.

Threshold standards are critical to providers’ registration, so is there a greater likelihood that research standards would be diluted or softened if they are included as ‘threshold’ standards?

Would the research standards be diluted to avoid the risk that a mainly teaching focused provider, conducting only a small amount of research in a limited number of fields, could lose its registration for a single breach of the research standards?

Would minimum standards for those universities where the bulk of university research is conducted be diluted to cater for this risk?

9. Research Standard number 5 states that:

An accurate, secure and up-to-date repository of the research outputs of staff and research students is maintained.

This is important in relation to both the ARC Open Access agenda and the implementation of ERA.

There is no specific mention of the open access agenda within the research standards. This is not only an ARC agenda but is also relevant to the NHMRC and current work deriving from the National Research Investment Plan (NRIP).