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Chief Executive:
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Dear Alan

Universities Australia Submission to the Draft Standards for Research, Research Training and Learning Outcomes (Research Training) Discussion Paper

Universities Australia welcomes the release by the Higher Education Standards Panel (HESP) of the discussion paper on the Draft Standards for Research, Research Training and Learning Outcomes (Research Training) (the Research Standards). Universities Australia has been pleased to work on these important proposed additions to the higher education regulatory environment.

We acknowledge that the discussion paper presents only some first thoughts on the format of the Research Standards and we would welcome the HESP's continued open and collaborative discussion with the sector so as to refine the formulation of these Standards through a patient and deliberative process.

Reflecting on the overall draft document, Universities Australia is prompted to remind the HESP of the intent of (regulated) Threshold Standards, being that of minimum standards that all providers must meet in order to enter and remain within Australia's higher education system, and in the case of Research Standards applying to all providers who conduct research, or undertake research and research training.

Universities Australia provides as an appendix to this document comments that have been discussed by the Universities Australia Standing Group on Quality that is chaired by Professor Greg Craven for HESP's consideration. Overall the Standing Group considered the Draft Research Standards, while workable, could be improved with a greater focus on 'outputs' as opposed to 'processes' with this also helping to clarify the intent of the standards. Other more specific issues are addressed in the appendix.

Universities Australia looks forward to engaging with the HESP in the further development of the Research Standards, in the first instance through the Standing Group, in the specific context of the further formulation of the Research Standards.

Yours sincerely

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Appendix: Draft Standards for Research, Research Training and Learning Outcomes (Research Training)

Background

The Higher Education Standards Panel proposes that research and research training standards are warranted in the revised Standards Framework and that these should apply to all providers who conduct research, or undertake research and research training. Given it follows that the proposed standards will be the subject of regulation it is essential that they are clear, non-contradictory and measurable (around the base assumption that they are sensible and workable standards).

With reference to the Draft Guiding principles

The view that the same standards should apply irrespective of the category of provider or the type of research being conducted either needs to be qualified with respect to discipline differences, or be broad enough to encompass the full range of research activities that an institution might engage in.

Defining 'Research Active':

There is a general problem with defining research activity as the basis for supervision of research trainees.

There will be initial definitional problems, the risk being that by attempting to codify this but leaving it to the institution to set self-referential threshold standards may result in a wide range of definitions being used across the sector. Should the status of 'research active' be applied to academic staff there may also be adverse consequences that go beyond the intention of the minimum standards.

Furthermore, there will be cases where it is entirely appropriate for non-research active staff (by definition) to be involved in supervision (e.g. ECR staff still building research portfolios, adjunct professional or clinical staff, retired or late-career staff).

UA would suggest that greater emphasis needs to be placed on the requirement for institutions involved in research training to have, and maintain appropriate processes and governance to ensure sufficiency and adequacy of research training provision. If a definitional structure proves beneficial, UA would favour one that focussed on 'research competence', as the underlying consideration.

With reference to the Scope of the Draft Standards

There is a level of inconsistency between process and outcomes that conflates the intent of the standards. If the standards seek to improve performance, greater attention to outcome standards, where possible, might be required.

The number of standards should be minimised where appropriate and be consistent with other standards (such as the Course Design standards or People standards). Academic governance for example is replicated in the Research standards (1), and Research Training Standards (1, 2) and might be rationalised into a single standard.

With reference to the Draft Standards for Research

1. Academic governance requirements for research

Sector wide there are certainly governance arrangements in relation to a, b and d-f, some backed authoritatively (e.g., via the Australian Code for the Responsible Conduct of Research). This is probably not the case for c. It is possible that each individual collaboration may not have specific governance arrangements.

2. Research Supervision

The removal of the word "direct" from direct supervision is recommended given the word can be misinterpreted to suggest a level of oversight and HR management not usually required for independent researchers.

3. Staff Induction

It is unclear why staff induction would be restricted to research and what the intent was in identifying it here. We suggest that it is better dealt under the People Standards.

4. Concept of 'Research-Active' Staff

Objections to use of research active status as noted above.

5. Repository of Research Outputs

This standard is fully supported.

6. Research Performance

Insertion of the word "Institutional" into the first line will make it clear that the standard is applied to institutional research performance, not individual researchers. Research will typically be assessed against units of organisation. The Field of Research (FoR) codes are essentially meaningless in this context. For example they are entirely inappropriate for the management of multidisciplinary research. Item c. is redundant. Institutional goals will capture targets and aspirational goals.

With reference to the Reference points

The Guiding Principles note that ERA performance reports are not an appropriate requirement for assessment of minimum standards; however, these are included as reference points for the Research Standards. UA would appreciate greater clarity from the Panel as to how reference points are to be used to ensure that they do not, in time, become de facto minimum standards.

In a similar vein, the use of "Fields of Research" comes into the document in Research Standards 6.a., Research Training Standards 7.b., and Learning Outcomes (Research Training) Standards 3.a. In these instances the word "discipline" might be more appropriately used and would better reflect the established organisational and reporting units of most research institutions. Discipline has international meaning within academia whereas Field of Research is an Australian Bureau of Statistics adaptation of the Field of Science and Technology codes defined within the OECD *Frascati Manual*, and may create the perception, even if unintentional, of an alignment with the ERA performance evaluation.

Draft Standards for Research Training

1. Academic governance requirements for research training

Under 1.a. it is suggested that the Standards should include the word "academic" immediately before "preparedness of the candidate". Institutions are able to assess academic preparedness of a candidate to undertake Research Training; however, to require them to undertake a full assessment of a candidate's overall preparedness (academic, social, financial and psychological) would be difficult without the imposition of significant administrative burden and cost to institutions.

3. 'Research-Active' requirement for supervision

Objections to use of research active status as noted previously.

8. Monitoring research training against institutional goals

Under 8.b. it is unclear how quality of supervision could be assessed as a standard.

Draft Standards for Learning Outcomes (Research Training)

Overall, there is a feeling that the standards have been written with a science view of the world and may require modification to relate better to humanities, social science or creative disciplines. In view of this, Standard 3 needs to be qualified with "...and relevant to the discipline".

Standard 3.e. relating to generic skills speaks of the transfer across different environments and fields of research. This might be desirable in some disciplines but not in others. This should not be a threshold requirement.

Standard 4.a. Defining “international standing” in the context of appointing assessors will be problematic due to the multiple interpretations that could be applied. International Standing could potentially represent a very low bar (or similarly a very high one).

Assessment requirements are suitably expressed but appear in the wrong section – these are not Learning Outcomes.