8 July 2013

Higher Education Standards Panel Executive
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Dear Members of the Higher Education Standards Panel Executive

RMIT University thanks the panel for the opportunity to make comment on the draft Higher Education Standards for Research, Research Training and Learning Outcomes (Research Training) and agrees that the primacy of research and research training activities within the higher education sector warrants the immediate and careful definition of these performance threshold standards.

Overall the University notes and endorses the guiding principles identified in the discussion paper and broadly supports each of the three sets of standards.

We would like to make some specific comments in relation to the proposed standards for your consideration.

Overall observations

Definition of Research

Each of these standards is premised upon a shared understanding of the term ‘research’. As the ways that we develop and acquire knowledge have broadened in recent times and the models of research and learning expand, the research, project and creative practice boundaries blur. This is a common challenge as data collection processes, funding regimes and performance reporting require this distinction of what is and what is not research in all its guises to be made.

RMIT supports the Government’s intention to promote greater recognition on non-traditional research outputs both through the Excellence in Research for Australia (ERA) framework and through the Higher Education Research Data Collection (HERDC) at some future point. Both the ERA Guidelines and the HERDC Specifications include a detailed definition of what constitutes research, and what evidence must be provided to support claims that a specific activity constitutes research. These definitions were developed in consultation with the sector and RMIT recommends that the Draft Standards should be consistent with these definitions which are widely accepted within the sector. RMIT has previously argued that ERA eligible creative works should be able to be counted in the HERDC and RMIT looks forward to further consultation regarding the alignment of the ERA and HERDC processes in 2013 and beyond.
**Principal and Associate Supervision**

RMIT strongly endorses the practice of supervisory teams for research trainees and recognises the benefits for both the student and the early career supervisor as they work in concert with an experienced colleague.

Clause 1 of the Research Standard includes all research activities of staff and students and therefore situates the research activities of students under supervision within this standard.

So it therefore follows that Clause 2 relates to both the supervision of staff and students undertaking research (i.e., research trainees):

Research (*including research conducted as part of research training*) is conducted by or under the direct supervision of staff with relevant qualifications, research experience and skills in the fields of research concerned.

This poses two questions for clarification:

- must all those engaged in the supervision of research trainees be staff of the university? In an institution such as RMIT with a breadth of industry engagement, some associate-supervision is undertaken by industry experts, who are not technically staff of the university but nevertheless have a level of expertise and experience that is highly beneficial to candidates.
- are these qualifications, research experience and skill in the field of research requirements relevant to all supervisors involved with a particular candidate or simply the principal supervisor as noted in Clause 3 of the Research Training Standards?

Similarly the guiding principles in the consultation discussion paper state that research training should be supervised only by ‘research-active’ supervisors and does not limit this to principal supervisors as indicated in the HESF.

The concept of associate supervision which may be undertaken by someone without the requisite doctoral degree or equivalence, with experience in a research technique but not directly the field of research or one who is not a staff member of the university is missing from the Research Standards if they are to be taken to apply equally to research and research training activities. This concept is also at odds with the literal interpretation of the Guiding Principles. From RMIT’s perspective, with much of our highly ranked research and research training proceeding from industrial and professional collaborations, this is a serious omission.

RMIT recommends that the Research Standards would benefit by modifying Clause 2 to read:

Research is conducted by or under the direct and principal supervision of staff with relevant qualifications, research experience and skills in the fields of research concerned.

**Research Standards**

*Induction and professional development of research supervisors*

RMIT notes the need for induction and ongoing professional development that are enshrined in the current Provider Registration Standards, Section 5, Human Resources. We recommend that these are reiterated in the Research Standards, particularly in respect to the induction and ongoing professional development of higher degree by research supervisors. We encourage the panel to consider making this explicit in Clause 3.
Goals for improvement

Clause 6 implies that the institution must set goals for research improvement. RMIT supports this approach to institutional research improvement but clarity is sought on whether there is an assumed requirement from the panel that these would be quantitative and measurable for the assessment purposes detailed in 6c.

Research Training Standards

Scope

RMIT seeks confirmation of the scope of applicability for these standards. Our interpretation is that they to apply solely to the research components of higher degree by research programs as defined in Levels 9 and 10 of the AQF with at least 66% research component. If this is the case, then the University is very supportive of all of the standards listed. However, if there is an expectation that these standards are to cover any minor research projects within a coursework degree or a Level 7 Honours program, clauses 3, 4 and 7 would be problematic in their current states.

Learning Outcomes (Research Training)

RMIT supports all the elements of this standard and notes that through Clause 4 it implicitly applies that these standards apply only to higher degree by research programs.

If you have any queries concerning RMIT University's submission please do not hesitate to contact Dr Julie Wells, University Secretary and Vice President on or email:

Yours sincerely

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Vice-Chancellor and President