I very much welcome your discussion paper, and its intention to set up higher education standards in research and research training. Thank you for giving us the opportunity to provide feedback on these draft standards.

A) Draft Standards for Research
I am broadly supportive of the draft standards for research. I very much support standards one, two, and three. These standards are extremely important as a guideline to undertaking research activities, and I hope that your Higher Education Standards will ensure that these guidelines will be met by all research staff and students at universities.

I have some minor comments or questions about standards 4, 5, and 6.
Regarding standard 4, the concept of ‘research active’ staff should be defined. I completely agree with that notion. I do wonder, however how all such a definition might vary across universities. What is ‘research active’? Is it perhaps possible to provide some guidelines in the standards as to which components should be considered when defining the concept of ‘research active’. Varying definitions of “research active” will have a major impact is some other standards (for example in research training) are dependent on what constitutes research active.

Regarding standard 5, it is completely unclear to me for should maintain an accurate, secure and up to date repository of the research outputs. Should such a repository be maintained centrally by the institution? Is a filing system maintained by staff and research students themselves sufficient? Or are you hinting at a national level repository? How long should research output be filed? For the duration of the project, the duration of a degree, the duration of a contract, or a specific number of years?
Regarding standard 6, I completely agree that the research performance should be monitored and reported and analysed and assessed for improvements. This is a ready done at most higher education institutions I believe. However the standards are not clear as to who is responsible for this monitoring of research performance. Should this be at a local school level, institutional level, federal perhaps? If performance is monitored or at a very local level, there are significant risks that de comparison will be influenced by the personal relationships between the assessor and the assessed person. I would definitely prefer monitoring at an institutional level by people are not directly working with the researcher, so that's personal feelings are not involved in the assessment process.

B) Draft Standards for Research training

Again, and very much like your research training standards. I think that it is extremely important that these types of research training standards are in place, to ensure that training of future academics and researchers is carried out against an acceptable level. I have no comments on draft research training standards number one, two, four, five, six, or seven.

Regarding standard 3, each research student is supervised by a principle supervisor with research active. This could be a highly restrictive standard depending on how research active is defined. I completely disagree that the principle supervisor has to be research active. Some teaching active staff can be excellent principle supervisors. I would caution against wording this standard as the "principle supervisor" having to be research active. I think it is desirable that at least one supervisor is research active with the relevant research experience, but this does not necessarily need to be to principle supervisor.

I very much like the fact that this standard specifies that there are our principle and associate supervisors, which implies that students should be supervised by team and not just one person. I also will be very much like the phrase "continuity of relevant supervisory expertise is maintained", which I think is very important for our postgraduate students. Too often I hear about postgraduate students whose supervisors are going overseas for longer periods or whose supervisors are retiring. It is great to see that continuity is now defined in national level guidelines.
Regarding standard 4, I very much like this standard’s notion that the principle supervisor should hold a doctoral degree or have equivalent research experience. It is important to me that supervisors have sufficient research experience in order to train research students.

Regarding standard 8, of course the quality and extent of research training should be monitored for it. I wonder, however, how some of these aspects could be measured. For example, quality of supervision: how can this reliably be measures and compared across institutions? How do you measure "actions taken to improve research training"? Is this by investments in infrastructure? By the number of appointments in academic staff to supervise students? By the number of workshops organised by the institution? I think it would be good if these guidelines are accompanied by a work plan that explains HOW the quality and extent of research training can be measured, what should be included, who should measure it, et cetera. Such a plan should not be presented as a fixed standards, but as examples that institutions could take up.

C) Draft Standards for Learning Outcomes (Research training)

It would be fantastic if we can indeed specify learning outcomes for research training courses. I frequently receive comments from overseas colleagues will are not impressed by the research training students have received in Australia. This is predominantly because academic expectations appear to vary greatly between institutions, and between faculties within an institution. I think that just stating "the learning outcomes for all courses of study are specified" is a missed opportunity for providing STANDARDS for learning outcomes. It would be highly desirable if these Higher Education Standards give an indication of academic expectations for higher degree research training. For example in terms of writing articles, or at least writing thesis chapters that could be published as articles, expectations in terms of presenting at conferences, expectations in terms of skills development (through coursework or workshops). These Higher Education Standards would benefit greatly if the learning outcomes for courses of study are, at least partly, specified within the Standards.

Regarding standard 3, I oppose to specifying "capacities to transfer across different environments and fields of research". I do not think it is desirable to expect Ph.D. students to be able to demonstrate that they have skills that can be transferred across environments. This is not a generic skill, cannot be adequately measured, and is likely to be too high an expectation for a Ph.D. student.
What I am missing in the generic skills, is explicitly specifying project management and communication skills. I think that both of these skills are extremely valuable and that not enough attention is correctly paid to project management and communication. If we want to deliver highly educated people to society they need to be able to communicate, not just with their peers but also with other stakeholders (such as policymakers, businesspeople, landholders, etc.).

I would be desirable if these Learning Outcomes Standards indicate that outcomes can be assessed through different means. A Master or Ph.D. thesis is only one part of the assessment. Many of my students focus solely on their thesis, and forget other parts of the assessment. I would recommend learning outcomes that specify that skills required for a degree are varied, and that such skills will be assessed in a variety of ways. These include a thesis, but also will require conference presentations, stakeholder meetings, organising and attending workshops, designing and presenting posters, exhibitions, public performances, et cetera.

I am looking forward to your final documents, and I hope that our universities will incorporate your standards with due diligence.

Kind regards,

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