

Dear Professor Robson,

The University of Melbourne welcomes the opportunity to provide feedback on the three draft Standards published on May 28, 2013.

The University views the development of Standards in Research, Research Training and Learning Outcomes (Research Training) as an important step in the further development of the regulatory framework for higher education in Australia and is very grateful to the Higher Education Standards Panel for their careful and consultative approach to standards development.

We are broadly supportive of the proposed standards, but have three primary points of feedback.

First, and most importantly, we question the purpose and need for Research Standards. We do so because we believe that any risks arising through research are already well covered by existing codes and regulation. In addition, effective peer review and competitive processes are the principal drivers of research quality. These processes include:

- the competitive recruitment and selection processes that determine who occupies funded research roles;
- the competitive grant application processes that select what research gets funded;
- the peer review processes that govern what research outcomes are published;
- the reputational appraisals that determine who has editorial oversight of publication processes; and
- the scholarly practices that ensure the grounding through citation of new research activities in the extant research literature.

We believe that these open, competitive processes are instrumental for an effective research culture and are overwhelmingly more effective than regulation in ensuring research quality. Indeed, we question whether regulation offers any benefit in the research domain, including to the achievement of the objectives of the TEQSA Act.

Second, while we share the view that the proposed standards give expression to many effective processes by which institutions can improve the quality of research, research training and learning outcomes for research training, we question whether the balance is right between outcome- and process-focussed requirements. We would prefer to see a greater focus on outcomes, fewer standards overall and fewer standards concerning process, in particular. We understand that the Panel is attempting to develop standards that cover the activities of both longer-established institutions and recent and prospective entrants to the category of providers that conduct research, or offer research training and conduct research, but we nonetheless think a clear set of primarily outcome-focussed standards will best serve the objectives of the TEQSA Act.

Third, if it is deemed necessary to provide a threshold characterisation of those providers that conduct research, or offer research training and conduct research, then the characterisation should give expression to core beliefs about the quality of research outcomes. In their current form, the Research Standards are almost exclusively focussed on process and provide no assurances about the threshold quality and effectiveness of research outcomes. We are aware of the difficulty of measuring quality but we nonetheless believe that this difficulty must be addressed directly if an effective threshold is to be developed. We propose a simple characterisation below.

We make some specific suggestions in each of the three standards domains below.

Research¹

As noted above, our preference would be to delete this entire section though we do agree that a statement concerning accessibility and openness of research outcomes would be appropriate, possibly under a more general provision governing the availability of information. Despite this preference, we give detailed feedback below on each proposed standard.

1. *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.*

We question the need within a set of Research Standards of a standard requiring that higher education providers comply with their own academic governance arrangements and existing codes and regulations. If a standard of this form is necessary, we believe it should apply to all of the provider's academic activities and would be better placed in the section of the standards dealing with academic governance and the provider's general operations. We therefore recommend that this standard become part of a broader suite of governance-related standards.

A further minor point is that there should be no need to specify in the standards that providers comply with existing regulation, since those regulations already require compliance. As a result, reference should be confined to any external guides that are currently non-binding but deemed to be essential.

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

We think that the peer review processes governing recruitment of staff to research roles, research funding and publication provide more effective oversight of research than a standard of this form. Innovation can spring from many sources, and competitive processes are generally effective in supporting innovations with promise and filtering out those of lower potential. We therefore recommend that this draft standard be deleted.

We also recommend deleting the standard because, if taken literally, it would rule out the development of new research fields because of the absence of staff with relevant qualifications, research experience and skills in the field of (new) research. In addition, even though qualifications, experience and skills are important predictors of research success, they are uncertain predictors. Research is risky by nature and research conducted by expert researchers with the relevant qualifications in fields in which they are highly experienced can fail. Equally, inexperienced researchers, with good fortune, can produce successful and valuable research outcomes. In other words, we see this standard as relying on an imperfect relationship between research process (characteristics of researchers or research settings) and research outcomes, and therefore as inappropriately blunt.

¹ Applicable to providers that conduct research, or conduct research and offer research training.

3. *Staff engaged in research are formally inducted into their roles.*

This is also a 'process-focussed' standard and we would prefer to see it replaced by a statement of the outcome that it is intended to achieve. If the intended outcome is compliance with the academic governance arrangements for research, then it is already covered by the current standard 1 (or, preferably, by a more general set of standards related to academic governance, as suggested above). Moreover, as it stands, it is a blunt instrument when considered in the context of the diverse research career trajectories that occur in practice (e.g. if a graduate researcher converts to paid employment as a research assistant following completion of their degree, are the research obligations as employee really different from those as a senior graduate researcher?) Consideration might therefore be given to framing a more general standard on effective HR practices.

4. *The concept of 'research-active' staff is defined and complied with in the implementation of research policy and practices.*

Again, this is an example of good current practice but it is, in our view, better seen as a means to an end rather than an end in itself. The end in question here is presumably a productive quantum of institution-level research activity and a rich research environment. If we apply the test of whether the registration status of a provider who is non-compliant with the standard should be questioned, we don't see this as a critical standard, since there are other means of achieving the same end. (For example, a search for 'research-active' on the Harvard University website yields 'No result found'). We would prefer, therefore, to replace this with a standard on research outcomes as we suggest below.

We also note that, as written, the standard fails to provide any assurance about levels of research activity, given that providers are free to specify their own definition of 'research-active'.

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

We agree that this is important and would also argue that data on a variety of research indicators, including research outputs, should be publically available. We therefore suggest adding "and summary reports on research indicators and research outputs are publically available" or referring to a need to make various data publically available elsewhere in the standards.

We could also see this standard as fitting under a more general obligation for transparency, consistent with our view that Research Standards are not really necessary within the Threshold Standards.

6. *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.*

This again is good current practice, but is also not an end in itself. It would be preferable to require providers to make a substantial and recognised contribution to research. For instance, the standard could read:

"The provider makes a substantial contribution to internationally recognised research."

Research Training²

1. *Research training is conducted in accordance with the provider's academic governance requirements for research training, encompassing:*
 - a. *requirements for admission and approval of candidature that take into account the preparedness of the candidate, the availability of qualified, competent and accessible supervision and the resources necessary for the candidature*
 - b. *the rights and responsibilities of students and supervisors*
 - c. *induction and orientation of students and supervisors*
 - d. *monitoring and maintaining progress*
 - e. *assessment, examination and the independence of examiners*
 - f. *publication of research findings, and*
 - g. *resolution of disputes.*

As for the first Research standard, we believe it is more fruitful to propose a general standard concerning academic governance of academic activities and compliance with those arrangements. We also think a general standard covering grievances, complaints, disputes and misconduct would be appropriate.

2. *Coursework formally included in a course of study that involves research training, whether as a component of or an adjunct to research training, meets the academic governance and quality assurance requirements required of other coursework offered by the provider.*

We question the rationale for this proposed standard since we see formal coursework as serving potentially different functions in research training programs compared to coursework programs. In coursework programs, assessment of coursework is vital to mapping students' progress towards the acquisition of course-level learning outcomes, whereas in research training programs, it generally does not contribute to the final appraisal of the course-level learning outcomes, which is instead based on the thesis and research project alone. Furthermore, formal coursework is often offered in a way that recognises the more independent learning styles and individualised learning needs of research training students as well as the role of coursework in creating a richer research environment that facilitates success. It may also be seen as providing a broad range of experiences that help to prepare students for their future careers (e.g. leadership training, project management, commercialisation, entrepreneurship, university teaching, broader disciplinary knowledge and cross-disciplinary expertise).

We therefore suggest that this standard be replaced by one that more directly ensures appropriate oversight of research training course design (and see the same suggestion under standard 6 below):

"The provider has a process for ensuring the quality of the entry requirements, learning outcomes, course requirements, supervision processes, methods of examination and exit pathways for each Research Training course that is overseen by the provider's academic board."

3. *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.*

We suggest that the following is more flexible but equally effective:

² Applicable to providers that conduct research, or conduct research and offer research training.

“Each research student has continuous access to one or more supervisors with relevant contemporary research expertise.”

4. *In the case of supervision of students in a course of study that leads to a research higher degree, the principal supervisor holds a doctoral degree or has equivalent research experience.*

While we agree that this standard reflects an ideal case, we also recognise that PhDs have sometimes been rare in disciplines including Law and Clinical Medicine, where practice (cf. research) leadership is often sufficient for a University appointment, even at senior levels (e.g. Clinical Professor). Some of these individuals will have enjoyed a long history of successful doctoral supervisions as principal supervisors. While such individuals might (now) satisfy the “equivalency test”, this provision would not appear to allow exceptions, or prospective equivalency. We would therefore prefer broader reference to a doctoral qualification or equivalent research experience within the research milieu, for example:

“In the case of supervision of students in a course of study that leads to a research higher degree, at least one supervisor holds a doctoral degree or has equivalent research experience.”

5. *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.*

The fundamental idea here is that students need to learn about the risks, obligations and opportunities associated with the research process – we suggest that this would be better and more generically captured in the Learning Outcome (Research Training) standards, as proposed in the next section below.

6. *Research students are guided and supported to shape the directions of their research, to develop capacities for independent research and to present and publish their research findings.*

We would also prefer to see this standard replaced by a more general standard covering research training course design. As suggested above, this could be:

“The provider has a process for ensuring the quality of the entry requirements, learning outcomes, course requirements, supervision processes, methods of examination and exit pathways for each Research Training course that is overseen by the provider’s academic board.”

7. *The standing of research arising from research training is monitored, including by reviewing all examiners’ reports independently of supervisors to obtain:*
 - a. *informed external views on the standing of the work in the field of research, and*
 - b. *in the case of doctoral degrees, evidence of a significant original contribution to the field of research.*

We see this as fitting within the Learning Outcomes (Research Training) standards and suggest it be moved there.

8. *The quality and extent of research training is monitored against institutional goals, both in aggregate and by field of research, encompassing:*
 - a. *durations of candidature and rates of progression, completion and attrition*
 - b. *quality of supervision*
 - c. *contributions of research students to institutional research performance*
 - d. *feedback from students, and*
 - e. *actions taken to improve research training.*

As for the final Research standard, we see this as good practice but not an end in itself. We recommend replacing this with a requirement to make data on research training outcomes public.

Learning Outcomes (Research Training)

1. *The learning outcomes for all courses of study are specified.*

We find this appropriate provided there is clarity that “course of study” is understood as the degree awarded. The PhD, for example, is a University-wide degree that has learning objectives and graduate (i.e. doctoral) attributes that are consistent and hence shared across the University. The University would not think it desirable to establish 50-60 different PhDs that are dependent on the research discipline, each with different learning objectives. This would significantly raise the compliance costs and make examination much more difficult, if examiners were asked to examine against criteria that were specific to a discipline-based PhD.

For consistency with our feedback on Learning Outcomes (Coursework), we recommend:

“The learning outcomes to be achieved on completion of a research training course are specified for that course”.

2. *The learning outcomes are comparable to those for the same or similar qualifications offered elsewhere in Australia, and are informed by international comparators.*

The unintended consequence of this provision could be ‘reversion to the mean’. Provided that HEPs can identify learning objectives in the offerings of other HEPs, they can modify their Learning Objective (downwards) to align with those offered elsewhere. International benchmarking independent of a standard is also problematic since poor qualifications from second and third-rate institutions with weak Learning Objectives would suffice as benchmarks.

We suggest instead:

“The learning outcomes for each course of study are consistent with the qualification awarded, and are informed by national and international comparators”

3. *On completion of research training, candidates will have demonstrated, at a level consistent with the qualification awarded:*
 - a. *a detailed understanding of the specific topic of research, located within a broad understanding of the field of research*
 - b. *the capacity to scope, design, plan and conduct research projects independently and in collaboration*
 - c. *technical research skills and competency in the application of research methods*
 - d. *skills in analysis, criticism, presentation, reporting and publication of research findings, and*

- e. *generic skills required for research, including capacities to transfer across different environments and fields of research.*

While the assessment of the thesis provides evidence in relation to 3a, 3c and 3d, we query the appropriateness of 3b and 3e in their current form. In relation to 3b, collaboration is an important and obvious activity that will improve the research outcomes of research training experiences in some settings, but in other contexts, there will be very limited opportunity for collaboration. We therefore suggest replacing the existing 3b with:

- b. “the capacity to scope, design, plan and conduct research projects”

Our concern with 3e is how to demonstrate transfer and indeed whether the expectation of transfer across fields of research is reasonable. We would prefer to see 3e replaced with:

“generic skills required for research, including an understanding of the risks, obligations and opportunities associated with the research process and the capacity to utilise research skills in different settings”

- 4. *Assessment of theses, dissertations, exegeses, creative works or other major assessable research outputs and materials is undertaken:*
 - a. *for doctoral degrees, by at least two independent experts with international standing who are external to the provider and any collaborating institution involved in the work, and*
 - b. *for masters (research) degrees, by at least one independent expert who is external to the provider and any collaborating institution involved in the work.*

While this is regarded as good contemporary practice within Australia, it is expressed in terms of a practice (that of utilising independent experts with international standing) rather than its intended outcome (a demonstrably rigorous and robust examination procedure). Even if we retain the procedural formulation, we think it would be better to formulate the standard in a way that captures the intended outcome, for example:

“Assessment of theses, dissertations, exegeses, creative works or other major assessable research outputs and materials is demonstrably rigorous and robust, being undertaken:

- a. for doctoral degrees, by at least two independent experts with international standing who are external to the provider and any collaborator involved in the work, and
- b. for masters (research) degrees, by at least one independent expert who is external to the provider and any collaborator involved in the work.”

We have also suggested replacing ‘collaborating institution’ with ‘collaborator’ in the statement above to avoid eliminating from the pool of potential examiners *all* those with deep expertise in the immediate research field.