Dear members of the Higher Education Standards Panel Executive,

Please find the following submission by the Australian Technology Network of Universities (ATN) to the Higher Education Standards Panel (HESP) Call for Comment—Draft Standards for Research, Research Training and Learning Outcomes (Research Training).

By way of background, the ATN brings together five of the most innovative and enterprising universities in Australia. ATN universities teach approximately 8,541 HDR students (Masters and Doctorate) and have 6,372 researchers, 31 research institutes and 61 research centres.

In the 2012 Excellence in Research for Australia (ERA) initiative 84% of ATN research was rated world-class (3, 4 or 5) or better – a growth rate of 34% since 2010, and 37% rated at above world class (4 or 5) – growth rate of 98% since 2010.

The ATN is growing world class research capacity faster than any other group in Australia, for example:

- Research income has increased by 50% in the last 5 years – 120% of the national rate;
- PhD completions have increased nearly 6% a year in the last 6 years – 2 times the national rate;
- Refereed journal publications have increased 55% in the last 5 years – over twice the national rate.

As a significant provider of research and research training, we welcome the opportunity to provide comments to HESP.

While the ATN broadly supports the proposed Standards for Research, Research Training and Learning Outcomes (Research Training) we make the following submission with comments and recommended changes to the draft Standards to ensure that they are workable and do not impede research partnerships with industry and other third party research providers based both in Australia and overseas.

It is essential that the Standards reflect that research is not always conducted within a single provider via a linear ‘master-apprentice’ relationship- it is increasingly a collaborative effort between multiple parties providing funding, expertise, human capital or other in-kind contributions. Therefore, research and research training may be
conducted under the supervision of a third party and the Standards should not act as an impediment to this where there are sufficient mechanisms in place to control quality.

Additionally, the ATN believe that research providers that have status as a registered university through the TEQSA process should not be subject to any significant additional reporting and compliance requirements from the introduction of the Standards.

If you have any queries or would like to discuss this submission further, please do not hesitate to contact me on or via e-mail at _____________________.

Yours sincerely

Vicki Thomson
Executive Director
Australian Technology Network of Universities (ATN)
HESP Call for Comment (Number 2, 28 May 2013)

Australian Technology Network of Universities (ATN) submission

The following submission takes the view of research students and research degrees as relating to Masters (AQF level 9) and Doctorate (AQF level 10) research (HDR) programs. Implementation of the Standards at lower AQF level programs would be problematic and the ATN would not support their use at those levels.

The ATN submission incorporates the feedback of individual ATN universities but is also influenced from experiences gained through the ATN Industry Doctoral Training Centre in Mathematics and Statistics (ATN IDTC), which is modeled on the approach of UK-based doctoral training centers that focus on transferrable as well as technical skills training through extensive engagement with industry by the research student.

The submission also reflects the ATN’s active role in facilitating agreements for international research collaboration with institutions in nations such as China and Brazil.

Executive Summary
The ATN broadly support the proposed Standards for Research, Research Training and Learning Outcomes (Research Training) and we support the minimalist approach taken. We have recommended a number of suggested changes to the proposed Standards to help ensure that they facilitate research collaboration with staff from third party Australian and international research providers and from industry.

It is important that research students have access to the requisite knowledge and skills to undertake high quality research, but this is not always sourced entirely from within a single provider. Similarly research students can gain much from having two or more supervisors, especially where diversity in supervision enables development of a richer perspective. Skills that may have been traditionally outside of the scope of a research degree- such as project management, communication and entrepreneurship have been highlighted as priority skills by the government and industry and the ATN has embraced the teaching of these skills to research students through the ATN IDTC model of doctoral training. The ATN IDTC is based on the successful doctoral training centre model in the United Kingdom.

The ATN seeks to ensure that the introduction of the Standards does not add to the reporting and compliance burden of registered universities where there are sufficient mechanisms in place to ensure quality research and research training.

Key recommendations
The key suggested changes recommended by the ATN are as follows:

Research Standards-
- Standards should not be narrowly focused and should not impede collaborative research with industry or with other research providers based both within
Australia and internationally by excluding staff from these organisations acting in a supervisory capacity;

- The ATN supports an institution-based definition of ‘research active’.

Research Training Standards-
- ‘Coursework’ should be defined by an institution as while it may be included in research training it may not always be of the same structure and breadth of focus as coursework in non-research programs. The ATN would recommend against the envisaged creation of a single set of standards for research and non-research coursework;
- The ATN supports research students having two or more supervisors where that works effectively. Research providers should be able to determine the most appropriate mix of supervisors based on their institutional research policy.

Learning Outcomes (Research Training) Standards-
- Generic, transferrable research skills such as communication and project management should be outcomes included in the Standards.

Detailed recommendations and explanatory statements

Draft Standards for Research

Q1. The ATN broadly supports the proposed Standards for Research.

Q2. Refer to suggestions below:

Draft Standard 2-
The wording of the Standard is too narrowly focused to be workable across the spectrum of research being undertaken across Australian research providers.

It may not always be possible for research to be conducted under the ‘direct supervision of staff’. The Standard needs to be more loosely defined to enable research to be conducted under the supervision of those who do not have all the attributes listed in the current statement but have those most critical for the type or stage of research being completed. For instance, research may need to be conducted under the supervision of an expert in the relevant field but who may not be staff of a research provider- such as where a research is being conducted in partnership with industry or in collaboration with a third party or offshore university. It is important that the Standards do not act as a disincentive to industry or third party participation in research.

The use of ‘Fields of research’ is similarly restrictive, with the ATN preference being for a broader term such as ‘research discipline’ or ‘area of research’ to encourage cross disciplinary and multi-disciplinary research activity.

Draft Standard 4-
The ATN supports the concept of ‘research active’ being defined by each institution in line with its research strategy and policy.
Draft Standards 7 and 8:
Where there is mention of monitoring in these Standards (such as it related to monitoring the standing of research arising from research training, and the monitoring of research training against institutional goals), it needs to be clear that it is the provider that is undertaking the monitoring and not TEQSA.

While these Standards are to be Threshold Standards that are subject to monitoring and enforcement by TEQSA, the ATN believes that universities registered through the TEQSA process should not be subject to significant additional reporting requirements or compliance burden from their introduction.

Draft Standards for Research Training

Q3. The ATN broadly supports the proposed Standards for Research Training.

Q4. Refer to the suggestions below:

Draft Standard 2-
‘Coursework’ should be defined by a research provider as there are often structural activities such as seminars and workshops within a doctoral program that may not be formally assessed or meet the requirements expected of undergraduate or Non-HDR degree coursework.

Due to the inherent difference between research and non-research coursework, the ATN would not support the merging of standards to create a single set of standards applicable for all coursework.

Draft Standard 3-
The ATN is supportive of requiring research students to have at least two supervisors.

It may be preferable to have a ‘team’ of supervisory expertise where that works effectively- for instance a team of supervisors comprised both of staff from within a research provider and others sourced from an industry partner or a third party research provider involved. This may offer a research student a richer and more diverse source of knowledge and expertise from which to draw from in relation to designing appropriate methodology and ethics approval, data analysis skills, content knowledge/expertise and research experience.

Draft Standard 4-
This Standard is in line with the ATN position and suggested changes highlighted in Draft Standard 2 of the Research Standards. Supervision of students by a principle supervisor holding a doctoral degree may not always be possible, but supervisors should have an equivalent level of research experience.

We believe that a Masters student needn’t always be supervised by a holder of a Doctorate degree. The Australian Qualifications Framework does not stipulate a required qualification level for the supervision of a Masters student (AQF level 9).
Research providers should have a sound governance structure and policy and process for determining the appropriateness of supervisors.

In the ATN IDTC, research students have a supervision team suited to the research project. Academic supervisors may be chosen from both the ATN University of enrolment and the other ATN Universities. Usually the supervision team would include a supervisor from the industry partner where research relates to industry specific content.

**Draft Standards for Learning Outcomes (Research Training)**

**Q5.** The ATN broadly supports the proposed Standards for Learning Outcomes (Research Training)

**Q6.** Refer to the suggestions below:

**Draft Standard 3e-**

Demonstrating generic skills is an important outcome for research students and its inclusion in the Standards is supported by the ATN. It is a focus of the ATN Industry Doctoral Training Centre in Mathematics and Statistics (ATN IDTC) which is based on the doctoral training centres operating in the United Kingdom. Research students undertake a 4 year program rather than the usual 3 years in order to incorporate transferrable generic skills- such as project management and communication- into the Doctoral program.

However, the requirement that all research students demonstrate evidence of their ‘capacities to transfer [skills] across different environments and fields of research’ may be problematic where there are significant differences between fields of research or the program is shorter in length- such as a 1.5-2 year Masters program.

Therefore the Standard should be reworded to ‘generic, transferrable skills required for research’.

**Conclusion**

The ATN broadly supports the proposed Standards for Research, Research Training and Learning Outcomes (Research Training). This submission recommends a number of suggested changes to the Standards to acknowledge that research is increasingly becoming a collaborative exercise and many ATN research projects are conducted in collaboration with third parties and their staff in industry and overseas.

Research does not always occur within a single institution as there are benefits in terms of access to resources and expertise that open up through collaboration. Similarly, an increased diversity of supervision of research and research training can facilitate the acquisition of a broader range of skills, including generic skills- such as communication, project management and research commercialisation- sought in research students by government and industry.
The proposed Standards provide the minimum criteria for critical aspects of research and research training and act as a framework that should inform the research policy of providers. The ATN believe that TEQSA-registered universities that have demonstrated a sound governance structure and research policies should not be subject to significant additional reporting or compliance requirements once the Standards are implemented.