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Dear Professor Robson

**HIGHER EDUCATION STANDARDS PANEL – DRAFT STANDARDS FOR  
RESEARCH, RESEARCH TRAINING AND LEARNING OUTCOMES (RESEARCH  
TRAINING)**

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The University of New South Wales (UNSW) welcomes the opportunity to provide comment on the **higher education standards panel – draft standards for research, research training and learning outcomes (research training)** under the Tertiary Education Quality and Standards Agency (Consequential Amendments & Transitional Provisions) Act 2011.

UNSW is a member of the Group of Eight (Go8) research-intensive universities which is formally affiliated with the Garvan Institute (Garvan), Victor Chang Cardiac Research Institute (VCCRI), Children's Cancer Institute of Australia (CCIA), NeuroSciences Australia (NeuRA), the Black Dog Institute and the Inghams Health Research Institute, as well as a number of teaching and research hospitals.

This submission represents a single and consolidated UNSW position made after consultation within the UNSW community.

**GENERAL COMMENTS**

In general, UNSW can find little to disagree with in the proposed standards – both the "Guiding Principles" and the individual standards represent existing practice within UNSW. The only issues identified seek clarity of the standards, rather than any concerns underlying issues they seek to address.

The major concern was the bureaucracy and red tape that may be implemented as part of establishing these standards for research and for research supervision.

UNSW supports a light-touch approach to the implementation which will not to create unnecessary additional administrative burden.

**SPECIFIC RESPONSES TO QUESTIONS RAISED.**

**HES Draft Standards for Research**

**Q1. Do you broadly support the proposed standards for Research? If not, why?**

Yes. UNSW broadly supports the proposed standards for research.

**Q2. Do you wish to make any suggestions in relation to the specific content of the standards?**

Yes.

Section 3 states that: "*Staff engaged in research are formally inducted into their roles*". It is not clear whether this relates to training and acceptance of the standards covered under item 1 as:

- 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.*

or some other induction procedures. It would be helpful if the meaning of formal induction was made clear.

#### HES Draft Standards for Research Training

**Q3. Do you broadly support the proposed standards for Research Training? If not, why?**

Yes. UNSW broadly supports the proposed standards for research training.

**Q4. Do you wish to make any suggestions in relation to the specific content of the standards?**

Yes.

The consultation document states the following points (in italics) which are not explicitly stated in the standards.

*"research training should be supervised only by 'research-active' supervisors and only in fields where the provider has sufficient capability, resources and infrastructure for the field of research and proposed candidatures"*

and

*"the draft Standards for Research Training presuppose that the provider conducts research in the field in which research training is offered and meets the Standards for Research as a pre-requisite for offering research training."*

If the point does not appear in the standard it cannot be appropriately applied and consideration of inclusion of such a point in the standards is suggested.

Points 3 and 4 both relate to supervision and should be combined to state:

*Each research student is supervised by a principal supervisor who is research active in the relevant field of research and holds a doctoral degree or has equivalent research experience. There is at least one associate supervisor with relevant research expertise*

*and continuity of relevant supervisory expertise is maintained throughout the candidature.*

Point 5 is redundant given that point 1 states that research training needs to be conducted in accordance with the providers academic governance requirements for research training and also states that this encompasses induction and orientation. Furthermore, the research standards state the required academic governance which includes all of the items in point 5. If it is considered by HESP that point 5 should be retained, then the correct term for OH&S should be used, which is Workplace Health and Safety.

Clarification is required with reference to point 6. While not disagreeing with the point, it is not clear what exactly this standard refers to and how it would be evaluated. If this is meant as a proxy for research environment, then this needs to be explicitly stated. Otherwise, it reads very much like a learning outcome, and should be moved into the relevant standard. Specifically the following could be moved into the learning outcome standard:

*develop capabilities for independent research and to present and publish their findings.*

#### HES Draft Standards for Learning Outcomes (Research Training)

##### **Q5. Do you broadly support the proposed standards for Learning Outcomes (Research Training)? If not, why?**

Yes. UNSW broadly supports the proposed standards for learning outcomes (research training).

##### **Q6. Do you wish to make any suggestions in relation to the specific content of the standards?**

Yes.

Point 2 could be more clearly stated along the lines of "learning outcomes are benchmarked against national and international best practice." In the current form, it is not clear what the standard means.

Point 3b which states that candidates will demonstrate the capacity to:

"...conduct research independently and **in collaboration.**"

This may not apply in some disciplines where the cultural norm is independent study and publication and collaboration *per se* does not occur. It could be better stated as:

"...conduct research independently and with **collegiality.**"

While Points 3 a-d are all able to be evaluated via the current examination of research degrees as well as other mechanisms incorporated into annual progress review and tracking of publication, Point 3e will be very difficult to evaluate and in terms of providing evidence to evaluation teams, it is not clear how this could be done. In particular, the phrasing "including capacities to transfer across different environments and fields of research" seems inappropriate.

Point 4 refers to the examination process and is not a learning outcome. It should be moved to the Research Training standards.

Point 4 could be misinterpreted. It states that examiners are:

"external to the provider and any collaborating **institution** involved with the work."

This should be restated as "external to the provider and without real or perceived conflict of interest." so that an examiner who is not involved with the work and has no conflicts is not disqualified merely because they are employed by a "collaborating institution".

**Q7. Do you wish to make any Overall or General Comments about the form, style, scope or any other aspects of the proposed set of research-related standards?**

Yes.

It is critical that the role and use of reference points is explicitly stated by the HESP.

UNSW would be happy to provide clarification on any of the points or issues raised in this submission or to contribute further to the Higher Education Standards Panel – draft Research Standards.

Yours sincerely

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Vice-President & Deputy Vice-Chancellor (Academic)