General Comments on Discussion Paper

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?

Research and ‘Non Threshold’ Standards

We agree with the Panel that “an arrangement of (regulated) ‘threshold’ and (unregulated) ‘non-threshold’ standards is not helpful”. However, in establishing separate standards for research and research training, it is important that these are the only standards for these topics. As noted in the Discussion Paper, research and/or research training are referred to in the Provider Registration Standards, Course Accreditation Standards and throughout the Provider Category Standards. There must be no possibility for confusion or expectation that providers will separately demonstrate compliance with standards relating to research and research training other than those proposed by the Panel. References to these topics in existing standards should either be removed or explicitly cross-reference the proposed standards.

Guiding Principles

- research training is critically dependent on a culture and context of research activity, without which research training should not be contemplated

While it is appropriate to limit (or even prohibit) supervision where there is no research at all, it is inappropriate to limit all research training. Research training (in the broadest sense) feeds into the research culture/context and vice versa. To restrict one would be at the expense of the other.

- 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

The word "only" is too strong. There are circumstances, such as relationship breakdown or supervisor departure, where a skilled supervisor not in a student’s specific field steps in to manage a student through their latter stages. Industry adjuncts often make excellent associate supervisors but may not be ‘research active’ in the academic sense.

- standards for research training must contemplate a diverse set of educational circumstances and, accordingly, should not be overly prescriptive

This is a good principle but there should be an expectation that the educational circumstances to which the standards might apply are reasonable.

- the Australian Code for the Responsible Conduct of Research, Australian Government, 2007 is an important and helpful reference point for all providers

Compliance with the Code should be sufficient to demonstrate that a provider meets the relevant standards with no possibility for confusion between requirements of the Code and the standards.

- standards developed for research and research training should not inhibit innovations in methods of research training

This should be expressed positively - standards developed for research and research training should encourage and recognise innovations in methods of research training.

- the onus of measuring or demonstrating achievements should remain with the provider

However, measurement and demonstration must use external reference points such as international benchmarks.
Scope of the Draft Standards

The Panel has sought to address items that it believes ....

- will not impose unreasonable regulatory burden on competent responsible providers who carry out research without offering research training, or carry out research and offer research training

This statement appears to create an artificial division between research and research training which is particularly inappropriate for a higher education provider.

Draft standards for Learning Outcomes (Research Training)

While coursework can include both summative and formative assessment, this is not the case in research degrees where there is a final examination based on written work (and therefore summative). In situations where a viva is part of the examination process, there may be opportunity for some retrospective assessment of the formative aspect.

Draft Standards for Research

Q1. Do you broadly support the proposed standards for Research?
Yes.

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

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

“Secure” could be misinterpreted as “closed”. While there will be restrictions on access to certain research outputs, the default position should be that items in the repository are publicly accessible. “Up-to-date” should be defined in terms of currency and the delay between production or publication of a research output and its appearance in the database. What archival responsibilities will the provider have to maintain when a researcher departs?

6. Research performance is:
   b. analysed by reference to national or international comparators

We suggest that “benchmarks” is better understood than “comparators”.

   6. Research performance is:
      c. assessed against goals for improvement.

It is difficult to see how this translates into a threshold standard. Research performance should be monitored within in an institution's processes for continuous improvement.

Draft Standards for Research Training

Q3. Do you broadly support the proposed standards for Research Training?
Yes.

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

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 this be rephrased to state “Each research student should be supervised by a principal supervisor with the relevant skills and expertise to supervise the candidate within the field”. The danger that the requirement for “at least one associate supervisor” could encourage a
“tokenistic” approach to associate supervision can be avoided by encouraging multiple opportunities for co-supervision. Supervisory teams that include early-career researchers as associate supervisors provide excellent development opportunities for new supervisors as does the inclusion of an experienced supervisor (even from a different research field) when those researchers first take on the role of principal supervisor.

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.**

This should be rephrased so that it is a standard, not an aspirational goal. For example, “Research students are supervised to shape the directions of their research, develop capabilities for independent research and to communicate their research findings”.

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.

The notion of decision-making should be included. The “informed external views” and “evidence of a significant original contribution” should be the basis on which a research degree is awarded.

8. **The quality and extent of research training is monitored against institutional goals, both in aggregate and by field of research, encompassing …**
   c. contributions of research students to institutional research performance

Contributions of research students to the body of knowledge in the field should also be monitored. In the case of doctoral degrees, there must be a significant original contribution.

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

**Q5. Do you broadly support the proposed standards for Learning Outcomes (Research Training)?**

We are concerned that these standards could create confusion with the learning outcomes established in the Australian Qualifications Framework. Either they should appear in one place or cross—reference each other extensively.

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

Learning outcomes from research training should include an expectation that candidates have contributed to the body of knowledge in the field. In the case of doctoral degrees, there must be a significant original contribution.

We appreciate the opportunity to comment on the Draft Standards. Our contact for this matter is:

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