1. Draft Standards for Research

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

Yes, but recognising the need to respond to specific issues with content. As a general comment it would be useful to start with a brief statement of scope and purpose – considering they seem to be more “research governance and management” standards or “conduct of research” standards rather than say “research quality” standards.

In general, over-dependency on “field of research” is problematic given that modern research is, of necessity, multi-, inter- and trans-disciplinary.

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

There is an unintended tension between S1 and the other clauses of the standard if the provider’s governance requirements do not completely align with these. We believe S1 needs some rewording: perhaps an over-arching catch-all to emphasize that these requirements need to address all components of the applicable standards.

Taken literally, S2 would inhibit the development of new research areas and curtail the transferability of research skills and experience (something emphasized in the learning outcomes (research training standards)); thereby basically going against the pattern of modern research. Instead of requiring qualifications, experience and skills in the fields of research concerned, perhaps applicable to the fields of research concerned would be less of a restriction but still address the competency intent.

Given the requirements of S2, S3 seems redundant – it seems to be about research student supervision in which case it should be in the research training standards.

S4 is somewhat meaningless unless there is an agreed definition of “research active” noting the alleged manipulations of that staff classification under ERA. Furthermore the intent of S4 is unclear.

General: If the standards are meant to stand alone they should not rely on definitions in reference points.

S6 is overly prescriptive – it slips from being a standard (what is required) to being an instruction (how it is done). The requirement appears to be for systematic monitoring and benchmarking of research performance. Furthermore, S6 fails to acknowledge that the assessment of research achievement is not a simple numeric exercise; this is particularly problematic for new and emerging research areas. It is also disconnected from the interest in research quality (rather than quantity) and research impact.

2. Draft Standards for Research Training

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

Yes, but recognising the need to respond to specific issues with content.

Two potential omissions in these standards are around:
- the regular monitoring of each student’s progress, not just through the supervisors; this may partially be the intent of S7 but it is not clear.
- the specification of the project; for instance, that it will achieve the required examinable outcomes within the available time assuming adequate supervisor and student ability. The unquantified term “significant” (S7B) applied to original outcome creates the potential for conflict between outcome expectations and duration constraints. Should “significant” be defined, eg “sufficient original contribution to clearly demonstrate capacity as a researcher”?

In general, over-dependency on “field of research” is problematic given that modern research is of necessity multi-, inter- and trans-disciplinary.

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

Under S1, “Intellectual property and copyright” perhaps should be explicitly listed as part of the governance requirements.

There is an unintended tension between S1 and the other clauses of the standard if the provider’s governance requirements do not completely align with these. We believe S1 needs some rewording perhaps an over-arching catch-all to emphasize that these requirements need to address all components of the applicable standards.

S6 should arguably include the need for students to come to locate (and link) their particular research into its disciplinary and other broader contexts.

S7 is unclear; it would appear to be intended to be about the examinable outcome of the research training. However “research arising” would take in research publications that may not be directly examinable and the word “monitored” probably should actually be “examined”. There is a critical timing difference between these two words; “monitored” suggests on-going engagement in the process, while “examined” refers to the standard assessment process for research training programs.

S8 makes assumptions about “institutional goals” encompassing particular considerations and then lists a mixed bag of what would be monitored; it may be better to just specify systematic monitoring and benchmarking of student experience and progress along with research training outcomes. S8d “feedback from students” is somewhat generic but is likely to include the students’ perspective on quality of supervision (S8d). What should be the targets for candidature metrics (S8a) compared with research performance (S8c) comes back to the tension between “significant” c/f “sufficient” original research.

**3. Learning Outcomes (Research Training)**

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

Yes, but recognising the need to respond to specific issues with content.

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

Nothing in S3 gives a useful guideline to the benchmark “significant original contribution” used in the research training standard; “sufficient original contribution to clearly demonstrate capacity as a researcher” (doctorate).
Given it is the case that it is not possible to conduct research projects *independently* in an increasing number of research areas, S3b should possibly be reworded, perhaps to emphasize “the capacity to make individual and collaborative contributions to”.

The notion of research skills transferability (S3e) is at odds with the somewhat prescriptive comments about expertise in fields of research in the other standards; “applicable to” being more aligned with transferability.

If S4 is to apply to the assessment of research training programs, it should commence “The examination of the assessable outputs from research training program such as theses, ...”. It is a pity that S4 does not include a specification that all examiners are provided with clear guidelines as to the expectations for instance as per S3’s requirements.

S4a could be seriously problematic for some areas of research, perhaps “normally with international standing but at least national” would be a better option.

The “external requirement” in S4a and S4b is not a necessary or sufficient condition for lack of conflict of interest. It would be better to explicitly state the what (standards) and not the how (requirement) – e.g. “who have no evident conflict of interest in undertaking the assessment.”