Higher Education Standards Executive  
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Wednesday 17th July, 2013

To Whom It May Concern

The Council of International Students Australia (CISA) commends the Higher Education Standards Panel for extending a second invitation for comments on the Draft Standards for Research, Research Training and Learning Outcomes (Research Training). This gesture reflects the panel’s commitment to engage stakeholders through a consultative process that will ultimately be beneficial to both government and industry.

CISA was established in 2010 through the combined efforts of the National Union of Students (NUS), Council of Australian Postgraduate Associations (CAPA) and the Australian Federation of International Students (AFIS). As a representative body, CISA is recognized by these student organizations and indeed the wider higher education sector, as the peak body that represents and advocates for international student interests in Australia. Our membership is composed of international student organizations as well as campus institutions that represent the interests of international students across Australia. CISA’s leadership is steered by an Executive composed of elected officials from the member organizations as well as ex-officio representatives from NUS, CAPA and AFIS.

As key stakeholders in the industry, CISA has both an interest and a responsibility to ensure that measures to improve the quality of coursework remains a priority in the delivery of higher education to International students. We therefore submit the following response to address the areas highlighted for comments in the ‘Call for Comment (Number 2, 28 May 2013)’. Structured in three parts; the first part will address the draft standards for Research, the second part addresses the draft standards for Research training and the third part addresses the draft standards for research training learning outcomes.

Once again, allow us to thank the panel for its continued engagement with CISA that would serve to enrich the process and ensure that Australia remains competitive in the delivery of education to both domestic and international students.

Should you have any inquiries, please do not hesitate to contact the undersigned.

Yours Sincerely,

Thomson Ch’ng  
National President

Naomi Rono  
National Education Officer
Part 1: Draft Standards for Research- Response to Questions

Overall, CISA commends the panel for drawing on the invaluable knowledge reflected in the ‘Australian Code for the Responsible Conduct of Research’ and the ‘Excellence in Research for Australia’, which serves to guide ethical research benchmarked against global standards that ensure the credibility and quality of research in Australia.

CISA hereby addresses the specific questions as follows:

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

Response: CISA supports the proposed standards with regard to research performance that incorporates a monitoring of the reporting aspect to research that is measured against the institutions overall goals. This approach to standard setting ensures that the monitoring of research, as a component of academic learning, is synergized with the overall monitoring of the institutions goals. It further provides a platform for measuring research performance against national and international indicators. This provides a mechanism for institutions to apply a comparative approach to monitoring and reporting on research performance that we anticipate will develop a culture of continuous improvement in this field.

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

Response: CISA refers to the inclusion of the provider’s academic governance requirement for research that seems to be the cornerstone for research evaluation in learning institutions. The standards provide criteria that would guide the establishment of the academic governance requirements. Clause 1.2 of the Australian Code for the Responsible Conduct of Research provides an aspect of risk management that should be critical in ensuring good institutional governance and management practices. CISA recommends that a criterion to reduce the risk of harm during research is incorporated to the listed aspects that guide the establishment of the provider’s academic governance requirement.
Part 2: Draft Standards for Research Training - Response to Questions

Overall, CISA echoes the general comment made above with regard to reference to the ‘Australian Code for the Responsible Conduct of Research’. We further commend the inclusion of research training as a course that should be evaluated against the academic governance and quality assurance requirements applied to other courses offered within the academic institution. This will serve to ensure that institutions support research training with the necessary resources and skills that would otherwise be offered to other courses of study. This, we believe, will result in improved delivery of the course and eventually support better research outcomes in Australia.

CISA hereby addresses the specific questions as follows:

Q3. Do you broadly support the proposed standards for Research Training? If not, why?
Response: CISA supports the proposed standards with regard to the monitoring of research training that incorporates the feedback of students. This mechanism will aid institutions in establishing quality assurance benchmarks that would serve to improve research training. This will also allow institutions to evaluate performance of their staff as well as the Institution as a whole, against learning outcomes of the course, which can only be realized through the engagement of students.

Q4. Do you wish to make any suggestions in relation to the specific content of the standards?
Response & Recommendation: CISA draws attention to clause 1.3 of the ‘Australian Code for the Responsible Conduct of Research’ that stipulates the responsibilities of institutions in training staff. While recognizing that the standards provide a requirement for orientation of both staff and students, CISA recommends that the standards incorporate a responsibility for the institution to continuously educate research staff to ensure that the standard of research training is maintained and kept up to date with developments in this field, such as changes in research methodology and related areas.

Overall, CISA commends the inclusion of an international benchmark to guide learning outcomes in research training. This will serve to ensure that Australian education providers are updated on the global expectation for research training. International students have the advantage of evaluating learning institutions in other jurisdictions prior to a decision to carry out their research graduate studies in Australia. It is therefore critical that research training in Australia maintains a leading reputation that can only be achieved through this comparative approach to the evaluation of learning outcomes.

CISA has addressed the specific questions as follows:

Q5. Do you broadly support the proposed standards for Learning Outcomes? If not, why?
Response: CISA supports the inclusion of generic skills required for research that would allow graduates trained in Australia to apply their knowledge and skills in a variety of environments. This approach is highlighted in the consultation paper of 2011, ‘Defining Quality for Research Training in Australia’, under clause 5.4 that draws attention to the changing nature of academic carriers that require a multidisciplinary approach to research. This standard will allow education providers to tailor the research training learning outcomes to ensure that Higher Degree by Research students develop innovative capabilities to support student long-term productivity.