



Professor Derrick Armstrong
Deputy Vice-Chancellor (Education) and Registrar

18 July 2013

Professor Alan Robson AM
Chair
Higher Education Standards Panel
By email: info@HEstandards.gov.au

Dear Professor Robson,

Higher Education Standards Panel Call for Comment (Number 2, 28 May 2013)

The University of Sydney is grateful for the opportunity to comment on the proposed draft standards for research, research training and learning outcomes for students undertaking higher degrees by research. We apologise for the delay in getting our comments to you. It has been a busy period.

As indicated in our response to the Panel's March 2013 first call for feedback, we are strongly supportive of the systematic, logical and consultative approach that the Panel is taking to revise and add to the current 'interim' standards framework.

We continue to support the overall direction the redrafting of the standards appears to be taking, and in particular the way that the process is being guided by consistent principles covering the content, scope and format of each proposed new standard. We are pleased for example that the current somewhat artificial distinction between regulated 'threshold' and unregulated 'non-threshold' standards is to be addressed. The proposed establishment of an integrated single set of regulated standards, which includes research and research training standards that will only apply to providers engaged in such activities, is a positive development. We are also pleased that the Panel is seeking to ensure that the revised standards specify only minimum acceptable levels of performance required for continuing registration for the providers to which they apply, are unambiguous about any requirements they impose on providers, and will not create an unreasonable regulatory burden.

We do have some comments on the three latest draft standards, outlined in the attachment, which we trust the Panel finds helpful. These comments are provided on behalf of the University's Research and Education portfolios. At the University of Sydney responsibility for research training sits within the Education portfolio in recognition that the delivery of high quality research training is core to our overall approach to education.

While we are encouraged by the way the new standards appear to be evolving, we look forward to having the opportunity to review the full proposed package of revised standards prior to their finalisation. Given the importance of the standards to the integrity of the regulatory framework we trust that the Panel will provide ample time for that critical final phase of review and consultation, and that at that point the consultation will include opportunities for broad-based face-to-face dialogue between the Panel and the sector.

Yours sincerely

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Draft Standards for Research, Research Training and Learning Outcomes (Research Training– Discussion Paper)

Draft Standards for Research

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

Yes, with some comments as outlined below.

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

Yes.

First, under 1, in addition to the six governance requirements (a-f), we recommend that consideration be given to adding at an appropriate point, a governance requirement for research to ensure the promotion of 'Academic Freedom' or 'Free Intellectual Inquiry' in research is captured. This includes a commitment to the open dissemination of research findings through academic publication and other means in the public interest. These are fundamental tenets of university research and teaching in civil societies that are enshrined in the enabling Acts of most universities as well as the *Higher Education Support Act 2003 (Cth)*.

Appropriate wording might be '***promotion and protection of free intellectual inquiry***'.

Second, under 1 and related to our first comment, we question whether the current listing of '**publication and authorship**' is sufficient to cover the need for higher education providers to do all that they can within the constraints of the relevant laws and resources to make the results of their publicly funded research (and associated data) available publicly through open access repositories and supporting policies.

Appropriate amended wording might be '***publication and data repositories, open access and authorship***'.

Alternatively, this issue might be addressed under proposed standard 5 with the following amended wording '***An accurate, secure and up-to-date repository of the research outputs of staff, affiliates and research students is maintained, with the outputs of publicly funded research made openly available to the maximum extent possible.***'

Third, under proposed standard 1, the proposed term '**research partnerships**' may be somewhat ambiguous as universities routinely undertake research on a fee-for-service consultancy basis for third party public and private sector organisations that may more accurately be characterised as *clients* than research partners.

Appropriate amended wording might be '***research partnerships and other agreements***' or simply '***research agreements with third parties***'. The term 'third parties' is widely understood by university providers at least and is being used routinely by the regulator.

Fourth, in relation to proposed standard 2, there is a large number of researchers in Australia conducting research under the auspices of universities, who are not their employees, but who hold a title with the universities, are subject to their relevant policies, procedures and indirect benefits. Moreover, at the University of Sydney we manage relationships with such researchers through a formal process of affiliation, and through our finance and human resources systems. We trust that the Panel's intention is that the

research and research training standards covering supervision will apply to all researchers conducting research under the auspices of registered providers irrespective of the precise details of the relationship.

Appropriate amended wording might be ***'under the direct supervision of researchers employed or affiliated with the provider who have relevant qualifications ...etc'***. A reference to relevant HERDC and ERA documents could be provided by way of guidance about what a formal affiliation entails.

Fifth, in relation to proposed standard 3, and consistently with our fourth comment, appropriate amended wording might be ***'Staff and affiliates engaged in research...etc'***

Sixth, in relation to proposed standard 4, and specifically the reference to the concept 'research active' we note that we are not aware of any current single nationally agreed definition of this term, and that what might constitute satisfaction of this standard varies widely between disciplines and researchers at different stages of their careers. The issues are complex and if the concept/term is to be entrenched in the standards framework there may be value in the Panel working with the sector to bring some clarity and consistency in approaches where appropriate.

Seventh, in relation to proposed standard 5, we note the focus on research outputs, but also the absence of any reference in the standards to the maintenance of research data repositories, including open access to these.

If it is agreed that this is an important omission, rather than deal with it in 5, might it be appropriate to address it by including a reference to data and open access in **1.d** as we have suggested in our second comment above.

Draft Standards for Research Training

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

Yes, with some comments as outlined below.

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

Yes, and as a general comment, we strongly support the feedback provided by the Council of Deans of Graduate Studies and Go8 Deans and Directors of Graduate Studies about the importance of the standards of the presence of strong research culture and environment. In cases where the provider is small, or has only a few researchers in a field, this environment can be created through collaboration with other providers.

First, under 1, and consistently with our comments on the proposed research standard, we question whether 1.b **'the rights and responsibilities of students and supervisors'** is sufficient to cover the concept of free intellectual inquiry.

Second, proposed standard 3 states:

"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."

The standard should recommend that the principal supervisor be currently or recently research active, but not mandate this. Being research active should be a threshold for a researcher to commence supervision, and in most cases, retain the right to supervise. There will, however, need to be some room for flexibility. For example, highly experienced researchers who are 'winding down' or 'retired' and may no longer satisfy the

definition of research active, however defined, but should not be prevented from being principal supervisors if it is clear that the arrangement will deliver a high quality supervisory experience. The wording of the standard could be adjusted to read 'a principal supervisor who is **or has recently been** research active...'

Third, standard 6 states:

“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.”

We support the sentiments behind this statement but suggest it be clarified regarding its intent. Is it meant to be a statement regarding the research environment in which a research student undertakes their studies? If so, it would be preferable to state this clearly. We would, in any case, recommend the inclusion of a statement regarding the depth and concentration of the research environment for research students and their membership of an institution's "community of scholars".

Draft Standards for Learning Outcomes (Research Training)

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

Yes, with some comments as outlined below.

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

Yes.

First, standard 1 reads:

“The learning outcomes for all courses of study are specified.”

In general, we see a need for greater clarification about how the proposed learning outcomes standards for coursework and research training will sit with the AQF, and what the status of the AQF will be in the period before the new standards are adopted, and afterwards. We therefore recommend that this standard be clarified to indicate the relationship between it and the relevant AQF level statements of learning outcomes [Levels 9 (Research Masters) and 10 (Doctoral Degrees)]. If "courses of study" means research courses as guided by the AQF as a reference point only, then consistently with the approach proposed for the revised coursework standards, this should be specified and the AQF listed as a reference point only.

Second, standard 4 reads:

“Assessment of theses, dissertations, exegeses, creative works or other major assessable research outputs and materials is undertaken:

- a. for doctoral degrees, by at least two independent experts with international standing who are external to the provider and any collaborating institution involved in the work, and**
- b. for masters degrees, by at least one independent expert who is external to the provider and any collaborating institution involved in the work.”**

We agree that it is critical to the quality of Australia's research training system that research supervisors and assessors are of high quality. We therefore agree that for most disciplines 'international standing' should be a required qualification of doctoral examiners as set out in standard 4(a). We do have some concerns, however, about the possible resource and process implications of undertaking and updating these assessments –

particularly for large providers with hundreds of disciplines and thousands of internal and external examiners. We also have some concerns about the implications of this requirement for the relatively small number of disciplines that are focused entirely on local or national issues. We therefore recommend that careful consideration is given to the operational implications of the 'international standing' requirement in all fields and to amending the standard to read '... at least two independent experts with **the equivalent** of international standing, who are external...'

Overall or General Comments

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.

The University supports the Panel's systematic and considered overall approach, and the generally much clearer wording for these standards that is emerging compared to the existing suite of interim standards.

We would just urge the Panel to continue to ensure that care is taken to maximise clarity and meaning, and to excise duplications and overlaps within and between the various standards. Care also needs to be taken to ensure that each individual standard specifies only the minimum threshold standard that a provider must meet in order to gain or maintain registration.

Moreover, in each case the Panel should consider the proportional and practical implications of the proposed requirement for all regulated provider types involved in research and research training (small and focussed, large and diverse). The Panel should satisfy itself that each proposed threshold standard can be operationalised by different types of providers in ways that impose a reasonable compliance burden only, and which do not result in unintended consequences such as those mentioned in some of our comments above. For example, compliance with the requirement that research students are supervised by a principal supervisor who is 'research active', however defined, will be a very different undertaking for large and small providers.

As indicated above, our experience in seeking to apply a definition of 'research active' for the purposes of classifying staff and assessing performance in different disciplines and career phases, has demonstrated that it is a complex and vexed area. While we see risks in any efforts to try to define the term at the national level, if left solely to providers to define on a case-by-case basis, this is likely to result in much duplication of effort. It could also result in significant complexity and cause difficulties from a regulatory perspective. It may be that there is a need for the disciplines themselves at the national level to be encouraged to discuss and agree what they believe is a minimum standard of 'research activity' in their given field. These disciplinary 'guidelines' could then be used as reference points by providers and the regulator.