Dear Professor Robson

Call for Comment Number 2 - Draft standards for Research, Research Training and Learning Outcomes (Research Training)

Thank you for providing the opportunity to comment on the proposed revised standards for research, research training and learning outcomes (research training). The Department provides the following comments regarding the draft standards noting, as mentioned in my earlier letter to you following the first Call for Comment, that the absence of the full suite of draft standards constrains our capacity to comment on individual draft standards.

The Department would like to express its appreciation to the Higher Education Standards Panel ('the Panel') for taking into account the views expressed in submissions to the consultation paper released in 2011, Defining Quality in Research Training in Australia. As you are aware, the Department has undertaken a range of activities in relation to research training and these were summarised in a letter that the Department provided to the Panel earlier this year.

The Department supports the intent and premise of the proposed revised standards which are generally consistent with the core elements of research training quality that were identified through this consultation process, but notes that some of them will be difficult to measure or monitor in their current format. Regulating against these current draft standards may impose additional reporting requirements on providers that contravene the government’s commitment to reducing red tape. The Department urges the Panel to either reconsider the current approach or reframe some of the standards, so that they are more amenable to regulation by TEQSA and are consistent with its legislated principles of regulatory necessity, risk and proportionality.

The Guiding Principle “the proposed standards should stand independently of any system that may be used to categorise providers,” may need revision to reflect both the discussion on the 7th June 2013 at the Standing Council on Tertiary Education, Skills and Employment (SCOTSESE) meeting, where it was noted the Panel would develop an issues paper on the provider category standards, and further development of the Standards. To ensure that the proposed revised standards are suitable for implementation across the sector they should be viewed in connection with provider categories to ensure complementarity. While the subject of what constitutes a university is likely to be contentious, it is of sufficient relevance and importance to warrant investigation by the Panel. I thank you for your agreement to supply the Department with an issues paper so as to inform us of your current views on the matter.
The Department notes that several of the draft standards (for example, Research – point 4 and Research Training – points 1 and 8) essentially require that providers comply with their own internal policies, rather than setting a minimum level of performance applicable to all providers. We presume this may be intentional to cater for the varying circumstances and profiles of individual providers.

For the purposes of clarity, it would be useful to provide an introductory statement that contextualises each set of standards and identifies, where appropriate, the activities to which the standards apply. The intended scope of key terms such as ‘research’ and ‘research training’ in particular should be defined to avoid ambiguity.

Specific comments relating to the content of the proposed revised standards are outlined below.

**Draft Standards for Research**

- Section 1 – It may be valuable to require providers to promote and protect academic freedom and uphold academic integrity as per section 4 of the existing standards.

- Section 3 – Instead of having a standard for induction specific to research staff, these should be addressed in a general statement that is applicable to all staff.

- Reference points – The Government recently announced the Strategic Research Priorities, which are intended to drive investment in areas that are of immediate and critical importance to Australia. These should be considered for inclusion as a reference point.

- The Department is consulting on the development of a university focussed research impact assessment mechanism. Once developed, and if adopted by the Government, the research impact assessment mechanism should be considered for inclusion as a reference point.

**Draft Standards for Research Training**

The Department would like to draw to the Panel’s attention a 2011 survey by Graduate Careers Australia of 3,532 recent Higher Degree by Research graduates which found that less than 39 per cent were employed in the higher education sector. The standards should therefore require providers to provide professional development opportunities, where appropriate, to develop student capabilities and gain experience relevant to careers outside academia, as well as to ensure the relevance of research training to labour market requirements.

Comments relating to the specific standards for research training are provided below.

- The standards should require providers to provide a copy of these standards to all research students, as well as a copy of the provider’s policies relating to academic governance and institutional goals, at the commencement of candidature.

- Section 1 – The capability development needs of students should be included as a sub point.

- Section 5 – The Department supports this in principle but notes that the very specific nature of the proposed standard may be burdensome for providers to report against. Similar to the comment about staff induction mentioned above, the induction of research students should be addressed in a general statement applicable to all students.

- Section 6 – This will be difficult to measure in an objective or quantifiable way.

- Section 8 – The ‘employment outcomes of graduates’ should be added as a sub point.
Reference point ii – Change ‘Guidelines’ to ‘Framework’ and correct the Council’s name to Council of Deans and Directors of Graduate Studies in Australia.

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

There appears to be overlap between the proposed learning outcomes and those identified in the Australian Qualifications Framework. To avoid unnecessary duplication the Panel should carefully consider what additional purpose this will serve.

The Department supports the Panel’s proposal to explore whether the learning outcomes for research training and those for coursework can be combined, provided these are supplemented by subsections where necessary to address the outcomes that are specific to each course type.

In developing standards for learning outcomes relating to research training you may wish to refer to the Researcher Development Framework that has been developed by the UK based organisation Vitae. This framework identifies and describes the skills that are developed through research training in a way which is intended to be understood and valued by employers in a range of sectors:


I understand that the Cooperative Research Centres Association has purchased a license to use the Researcher Development Framework and it is being considered for adoption as a tool within the sector.

Once again, thank you for the opportunity to comment on these draft standards. The Department would welcome the opportunity to meet with the Panel to discuss these issues in greater depth and looks forward to opportunities for regular engagement throughout the process.

Regards

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