



Emeritus Professor Alan Robson  
Chair, Higher Education Standards Panel  
[info@HEstandards.gov.au](mailto:info@HEstandards.gov.au)

Dear Professor Robson

TEQSA welcomes the opportunity to respond to the Higher Education Standards Panel's ('the Panel') second call for comment on proposed revisions to the current higher education Threshold Standards, outlined in the Panel's discussion paper of 28 May 2013 and in the accompanying draft standards for Research, Research Training and Learning Outcomes (Research Training).

TEQSA offers the observations set out in Attachment A as a response to the Panel's second call for comment. They should be read in the context of TEQSA's general observations of 16 April 2013 made in response to the Panel's March discussion paper.

As noted in our earlier response, TEQSA is mindful, in considering the possible implications of any changes to the current standards, of both: (1) the regulatory impost on higher education providers (HEPs) that may follow; and (2) the practical application of the framework in the regulatory process. Based on its regulatory experience to date, TEQSA considers that proposed amendments to the standards should balance the need for inputs as well as outcomes to take account of the diverse circumstances of well-established, greenfield, and aspiring providers.

We look forward to future engagement with the Panel on its work and the opportunity to take a holistic view of the standards framework as it evolves.

Please contact Commissioner Dorte Kristoffersen () for clarification of any of the points raised in this submission.

Yours sincerely

Dr Carol Nicoll PSM  
Chief Commissioner

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## Attachment A: TEQSA response to proposed revisions of the Higher Education Standards Framework – second call for comment

### General comments

**Defining terminology** - The Panel has not yet released a definition of ‘research’. This may be intended to be included in a glossary of terms to accompany the revised standards framework, and will be important to contextualise the draft standards being proposed.

**Regulatory burden and applicability across providers** – Currently the Threshold Standards (as defined at section 5 of the *Tertiary Education Quality and Standards Agency Act 2011*) do not include the Research Standards. The Panel proposes that the research standards be incorporated within the Threshold Standards. TEQSA notes that expanding the Threshold Standards, will create further regulatory responsibilities for providers.

Assuming that the requirements of the (draft) research standards would need to be met by a provider as a prerequisite to offering any research training, there is potential for these to inhibit existing or new providers from beginning to offer even a small amount of postgraduate research training into the future. While requirements within the research standards are important to support high quality research, the proposed standards do not reflect the wide diversity of providers and research activities within the sector.

TEQSA considers that some of the proposed research standards are focussed at a detailed operational level and therefore may increase the regulatory burden and impost for providers, with differing implications for small and large providers.

**Minimum requirements** - As currently drafted, some standards do not stipulate minimum expectations. For example, standard 1 of the Research Standards is based on a provider’s own academic governance requirements, rather than any defined minimum requirements. Without that definition, it would not be practical for TEQSA to regulate against the many and diverse governance frameworks that exist within the sector.

Draft standard 4 of the Research Standards provides no minimum expectations of how ‘research active’ should be defined. TEQSA would be required to regulate compliance against a provider’s internal definition of ‘research active’ staff which is likely to vary significantly across providers. Furthermore, we consider defining a standard in terms that would require TEQSA to assess compliance with a ‘concept’ to be problematic.

TEQSA’s approach to regulation is based on providers being responsible for demonstrating a case that they meet the Threshold Standards. Without clarity about the minimum requirements contained within the standards, it will be very difficult for TEQSA to regulate effectively against these.

**Clarity of terms** - There is potential for differing interpretations of the standards as they are currently drafted because of ambiguities, which are likely to cause challenges for regulating. Examples relating to specific draft standards are noted below.



## Research

**Research management vs governance** - A number of the requirements listed under Standard 1 (a) to (f) are research management issues which extend beyond academic governance and normally involve a corporate governance dimension. The current wording leaves some room for ambiguity as to whether it is the 'research activities' or the 'governance requirements' that should encompass the requirements listed at points (a) to (f). TEQSA suggests the standard be reviewed to take account of these issues.

**Clarity of terms** - TEQSA considers that a higher degree of clarity of a range of standards, exemplified by the following, would strengthen practical application of the standards.

- Standard 1: 'responsible research practice'. What is deemed 'responsible'?
- Standard 2: 'relevant qualifications'. What level of qualification should be considered 'relevant'?
- Standard 3: 'Staff are formally inducted into their roles'. What are minimum expectations for a 'formal process'?
- Standard 5: a 'repository' is required to be maintained'. What would be the expected features of a repository? In any event, it appears that the intent of this standard is to achieve the outcomes required in standard 6 and so it could be deleted. Alternatively, the wording might be amended to read "accurate and current information on research activities is kept."
- Standard 6: 'national or international comparators'. What does 'comparator' mean in this context?

## Research Training

**Clarity of terms** – In addition to the examples noted above, further clarity within the proposed Research Training standards is also suggested, as outlined below.

- Standard 1 (g) –How might the scope of 'resolution of disputes' be determined? For example, does this refer to disputes between a candidate and their supervisor; between supervisors; and/or between students? Should this scope also be interpreted to include dispute resolution between institutions involved in collaborative research?

**Number of supervisors** - Standard 3 implies at least two supervisors are necessary, although it is not framed as a requirement. TEQSA suggests that the standard be redrafted as an outcomes statement to provide greater clarity of expectations.

## Learning Outcomes (Research)

**AQF requirements** – The draft standards are currently silent on some requirements within the Australian Qualifications Framework (AQF), such as the expected volume of learning. TEQSA recommends that compliance with the AQF should be specified within the Learning Outcomes (Research) standard, and also within the standard covering Learning Outcomes (Coursework).

**Clarity of terms** - 'Comparable to' and 'informed by' within standard 2 could be subject to differing interpretations. TEQSA suggests that the Panel consider redrafting this section for greater clarity.



***Individual versus institutional outcomes*** - several of the requirements within standard 3 would be difficult to assess. It is not clear, for example, how to test whether a student has demonstrated 'the capacity to scope, design, plan and conduct research projects independently and in collaboration' or "skills in ... presentation ... and publication of research findings ...". This standard could be removed as it goes to a level of detail that would be expected to be assessed at the level of the individual student, and thus would be covered if the requirements of standard 4 are met. Alternatively, the standard could be revised to focus on institutional level mechanisms of assessment.