SUBMISSION TO THE GUIDANCE NOTE CONSULTATION: RESEARCH REQUIREMENTS FOR AUSTRALIAN UNIVERSITIES

September 2022

Universities Australia welcomes the opportunity to make a submission to the Tertiary Education Quality and Standards Agency (TEQSA) regarding the Guidance Note: Research requirements for Australian universities.

Universities Australia is the peak body for Australia's 39 comprehensive universities. Our members are spread across Australia, in regional and metropolitan areas. They educate more than a million students each year and undertake research that adds to Australia's stock of knowledge, and to Australia's economic and social wellbeing.

KEY POINTS

UA notes the announcement by the Government of the Review of the ARC, including ERA, as well as the Statement of Expectations released by the Minister for Education which requests that the preparations for ERA 2023 be discontinued. UA notes that further consultation between TEQSA and the university sector may be required to update the Guidance Note once these review processes have been completed, given the outcomes may impact on policy and processes outlined in the Guidance Note.

Concerns regarding the mapping of Fields of Education onto Fields of Research

UA notes the considerable effort made to map Fields of Education (FoE) onto Fields of Research (FoR) however, this is conceptually an unsound exercise.

The two sets of classifications have been developed separately and are not designed to be mapped onto each other. Errors introduced via such a process had less severe implications when institutions were only required to demonstrate the existence of research activity corresponding to the broad FoE. However, the extension of this exercise to the measurement of research quality exacerbates its shortcomings.

For example, with regard to the concordance table, clarification is needed on whether the World Standard/National Standard criteria is needed for *all* broad FoRs related to a given FoE. The Guidance Note states that "

> "Some existing providers may not be able to evidence World Standard due to failing to meet the volume threshold, or due to only partial coverage of a Field of Education. In these cases, TEQSA will look to the benchmark of National Standing in fields specific to Australia".

In reality, partial coverage of a Field of Education code is common. For example, a number of universities will not conduct research of meaningful quantum across all the FoRs related to the FoE Natural and Physical Sciences (Mathematical Sciences, Physical Sciences, Chemical Sciences, Earth Sciences, Biological Sciences).

The question is whether a higher education provider would need to show that it conducts research of world standard/national standard in the *majority* of related 2-digit FoRs for a given FoE; or whether a higher education provider would have to show that it conducts research of world standard/national standard in *all related 2-digit FoRs for a given FoE.*

The Guidance Note also states that potential risks that could prompt closer scrutiny by TEQSA assessors include "Claiming a field meets the benchmark because some parts meet one benchmark while others meet another benchmark; the broad field overall must be of World Standing and/or National Standing".

Below are further examples of the challenges highlighted by member universities:

- It is unclear how universities can demonstrate they meet World Standard for a single FoE. For example, Psychology sits within Society and Culture (09), along with archaeology, anthropology, history, and social work. Given the FoE is so broad, how are universities to achieve World Standard across the entire FoE?
- The FoRs of Health Sciences and Biomedical and Clinical Sciences have been merged to correspond to the single FoE of Health. This is counter to the recent reforms of the 2020 Australian New Zealand Standard Research Classification (ANZSRC), and it fails to give the appropriate weight to research activity in both of these FORs.
- The FoR Division *Indigenous Research* has been distributed across a range of FoEs as there is no corresponding broad field FoE. This in effect reverses the initiatives of the 2020 ANZSRC reforms to give visibility for indigenous research. Furthermore, institutions that may choose to focus on Indigenous research at the Division level will not get the appropriate credit.
- It is not clear why Economics is grouped with the 'Society and Culture' FoE over the 'Management and Commerce' FoE given that this subject is often more aligned to Business/Management courses delivered by a university.
- FoE 09 comprises the 2-digit FoR codes 47 (Language and Linguistics), 44 (Human Society), 43 (Archaeology and History), 52 (Psychology), 48 (Law), 50 (Philosophy and Religious Studies) and 38 (Economics). These codes are from large and diverse fields, some of which may have research at World Standard and some which may have research at National Standard.
- We note especially, significant loss of nuance in medicine, health and human science, as well as in education and a number of the humanities areas.

Other approaches to research quality assessment

UA supports a flexible approach to research quality assessment and agrees with the approach by TEQSA to "look for a provider's systematic approach to self-assurance for research quality", in addition to referring to a provider's existing assessment results, such as ERA.

It is important to note that internal and external systems are not independent. Institutions support and oversee researchers in conducting quality research that attracts external funding, is published in peer reviewed journals and has significant impact in the community. In this way, research is subject to both internal and external quality assurance at multiple stages of its lifecycle.

ERA is a particular, retrospective, collective assessment of research quality but universities also can point to ongoing internal and external quality assurance via mechanisms such as recruitment, development, promotion, publication, grant funding, industry funding and outreach. In other words, research quality is subject to multiple, converging lines of sight from different internal and external stakeholders and assessors, which an institution might be invited to spell out during accreditation or re-accreditation.

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ARC role in research quality assessment

P. 3, para 2 from the bottom of the page: it is stated that "TEQSA will rely on ARC's judgements when assessing the World Standard benchmark".

UA suggests that the sentence relating to the role of the ARC be amended as follows:

> "Where assessing performance relative to World Standard, TEQSA will be guided by the ARC's recognition that research in fields specific to Australia may be published less frequently in highly ranked international journals and/or be cited less by overseas researchers, resulting in a reduction of key metrics that would otherwise apply in that field."

Specific issues:

- P. 2, para 4: UA seeks further information on what the "calibration to a provider's maturity and risk profile" means.

  UA seeks clarification on what the dimensions of maturity are and what categories of risk are most relevant. Institutions should have a clear mapping and management of research related risks (including in its conduct and dissemination), but it is not clear how maturity and risk intersect.

- TEQSA notes a potential issue of a "lack of external scrutiny or peer review of research quality" (p. 4). We question this approach given long-standing norms around peer review of both funding for research and research outputs.

  UA seeks further clarification on which elements of research quality lack external scrutiny.

CONCLUSION

The performance of world class research by all universities is a key feature of the Australian university system. Accordingly, Universities Australia supports a flexible and robust measure of research quality as part of the threshold standards.

UA would be pleased to discuss with TEQSA any of the points raised in this submission.

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