UNIVERSITIES
AUSTRALIA

**Chief Executive
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Research Commercialisation Enabling Team
Australian Government Department of Education

Re: Feedback on National Industry PhD Program – draft guidelines consultation – second round

Thank you for the opportunity to provide feedback on the National Industry PhD Program revised draft guidelines. We are pleased that many of Universities Australia's (UA) initial comments have been incorporated into the second version of the guidelines. Please find our comments on the revised draft guidelines below. We look forward to working with the Department of Education to share information with our member universities about this important program when it is established and continuing to work with the Department to refine details of the program.

Overall comments

- This new program will further incentivise partnerships between universities and industry. However, it is important to note that universities already collaborate with industry through industry-linked PhDs, and it is important that existing partnerships are not negatively impacted by this new approach. Additionally, it is suggested that this program could be used to support existing collaborations.

- UA is pleased that the Service Provider will take an active role in connecting universities and industry (Clause 6.2) where needed. It is noted that the discovery process will continue to be a potential risk to the success of the program. However, UA seeks further clarification on the role of the third-party Service Provider.

- UA also noted that the Department of Education (Attachment A, 1.6a) will be selecting the Service Provider. UA would welcome consultation on the selection of the third-party Service Provider.

- UA would like to see industry engagement leading to additionality in the industry R&D effort, rather than replacing research that businesses would otherwise have self-funded.

- As noted in our previous submission, UA still has concerns that SMEs in particular will not have project lengths that span the full length of a PhD. UA suggested the option for candidates (for the Industry Linked PhD stream) to work with multiple industry partners, and that this could be tested through a small pilot with industry partners drawn together through an industry representative body.

- The capacity to identify industry projects prior to students enrolling is important, as well as knowing a scholarship will then be available.

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Specific comments

International students

Clause 2.4: UA welcomes the inclusion of international PhD candidates in the Program but makes the following points in this area:

- Firstly, further clarification on the 10 per cent limit is needed. It is unclear if the 10 per cent of total funded places can or must be given to international students, and what the split between the two streams would be.

- Secondly, for international candidates, universities would have to use the stipend from the IRTP allocations, given the need to provide a base rate stipend to the successful candidate. This will reduce the number of scholarships provided to international candidates outside this program, and prioritisation will be skewed towards industry linkage PhDs rather than general scholarships for international students and other strategic international programmes currently in place or being explored.

- Thirdly, while the inclusion of international students is welcomed, some universities hold concerns that 10 per cent is too low. This is especially so if other programs (such as Destination Australia) cease, leaving few prestigious scholarships available to international applicants.

- Finally, the timeline as set out in the guidelines assumes that international students will receive their visa and are able to enter Australia and commence their studies in approximately six months. UA suggests flexibility regarding the commencement date in these circumstances.

Program duration for Industry Linked PhD Candidates

- Clause 3.1: UA suggests changing the duration from a minimum of three years to a minimum of two years. Universities have different enrolment policies, and while clause 3.1 notes that the program duration is subject to the Participating University's scholarship policies and agreement, this may be subject to interpretation and can lead to inconsistency across the Program. In practicality, the PhD student is required to satisfactorily meet all milestones and address all requirements of the doctoral program, and if they are able to do in less than three years, they should be able to do so under the Program.

Training provision for Industry Linked PhD Candidates

- Clause 4.8: As stated in our previous submission, UA urges the Department to include a similar provision for the Industry Researcher PhD stream as they would also benefit from support and training in research skills and tools.

- Additionally, it is still not clear if the 12-week training is in addition to the candidature duration specified in section 3. It is critical that the training is designed to not impede the candidates' progress in their research projects.

- It is paramount that the training be relevant to all disciplines.

- Further clarification is needed as to whether this training (or elements of it) would be open to students who are not formally part of the Program. Given the extensive work already being undertaken by universities to up-skill HDR students in relation to engagement, collaboration, communication, commercialisation, and impact, it would be valuable to create synergies across the sector where possible. Additionally, this would avoid duplication of training.

Doctoral Training Centres

- The "invite for proposals for multiple collaborative PhD Research Projects, such as doctoral training centres" is appreciated, given the inherent benefits of developing strong HDR student cohorts and communities. How these opportunities are understood, or how they would be considered, however, remains unclear.

- Further clarification on the below issues would be valuable:

  » noting the weightings proposed, whether projects will be evaluated when they are proposed as a cohort or centre, compared to individual projects;

  » whether such centres can include both Industry Linked PhDs and Industry Researcher PhDs; and

  » whether there be flexibility around the number of students, or the number of university or industry partners embedded in such centre.

Selection Process

- Clause 7.1: UA welcomes the establishment of an *independent assessment advisory committee* to make the determinations listed in Clause 7. Further information regarding the composition of this committee would be appreciated.

- In the case of oversubscription, the selection process for PhD Research Projects will be based on a list of criteria. UA is pleased that an Independent Assessment Advisory Committee will oversee the selection process in the case of oversubscription. Universities look forward to understanding how this process will be implemented in an efficient and effective way.

- The current weightings strongly favour PhD projects that are embedded into long-term existing partnerships between the university and its industry partners. This can impact the ability for more recent and emerging collaborations to gain access to this program. It would be valuable to consider revising the weightings, for example by increasing the weighting aligned to the relevance of the project to the Industry Partner.

Ceasing of business operation

- Clause 9.5: UA suggests that where a business ceases to exist mid-candidature, and the $40k annual subsidy to the Industry Partner discontinued, that the Participating University will be compensated for finding a reasonable solution to support the completion of the PhD Research Project.

Feedback on the flowchart

The draft flowchart offers a very valuable overview of the proposed process. It also raises some questions that would be worthwhile considering further. In particular:

- Aligning the process of both Industry Linked PhDs and Industry Researcher PhDs offers simplicity. However, it limits the ability to respond to characteristics that differ between the cohorts. In particular, while Industry Researcher PhD candidates are commonly identified as part of the application, Industry Linked PhD candidates may be recruited at a later stage. Hence, it may be possible to allow Industry Researcher PhDs to start their candidature as soon as the agreement is finalised, rather than wait for the following semester to be able to begin their PhD journey. This option may also be of value for pre-identified Industry Linked PhD candidates.

- In relation to Industry Linked PhDs, it is unclear whether the timeline for the identification/admission of PhD candidates and the negotiation/finalisation of the agreement is indicative or fixed. Given the need to advertise the project and opportunity, identify, interview and evaluate applicants, facilitate the application process, apply for a visa (where relevant), as well as negotiate and enter into a collaborative agreement, the timeline is likely to differ between projects and partners.

UA would be pleased to work with the Department on the issues raised in this letter.

Yours sincerely,

Catriona Jackson
Chief Executive