

CONSULTATION – DRAFT LEGISLATIVE INSTRUMENT

Recommendations

- That existing quality assurance outcomes and Government-held data be the primary mechanisms of assessment for institutions in the ‘Australian University’ category.
- That a pathway to demonstrate equivalence be provided for prospective new entrants to the ‘Australian University’ category.

INTRODUCTION

Universities Australia appreciates the opportunity to provide comments on the draft legislative instrument, proposed to be made under an amended Tertiary Education Quality and Standard Agency (TEQSA) Act 2011. Universities Australia understands that the legislative instrument supports Recommendation 5 of the 2019 Review of the Higher Education Provider Category Standards that addresses research quality for institutions in the ‘Australian University’ category.

Universities Australia recommends that an underpinning principle should be that the legislative instrument avoids creating duplication of data collection and reporting, and makes best possible use of the Excellence in Research (ERA) exercise for institutions that have been assessed under that program. Prospective new entrants to the Australian University category would be expected to demonstrate equivalence.

Universities Australia believes there is further work to be done to align measures of research quality under the Threshold Standards with other Government policy directions, and to consider possible unintended consequences of the approach proposed in the consultation draft.

In the comments below, Universities Australia has made assumptions about how the instrument might be applied. Those assumptions include that a minimum threshold will apply to any metrics, and that this minimum will be subject to a separate consultation with the university sector.

Universities Australia also assumes that the legislative instrument is for registration and re-registration purposes only.

PRINCIPLES

When determining the consideration in an assessment of research quality, Universities Australia recommends that the measures align with Government policy directions, and use existing assessments and collections where available, in order to avoid duplication.

In recent times, Government policy has been to move away from volume metrics to measure quality, and to encourage university research outcomes to reach a broader audience than just other university researchers. This has been enacted through changes to the Research Block Grant allocation methodology, and in the introduction of the Engagement and Impact exercise to complement the Excellence in Research Australia (ERA) exercise.

Universities Australia urges TEQSA to ensure that any measures included in the legislative instrument make use of existing data and exercises, and to not duplicate existing reporting to Government. Instead, Universities Australia advocates that TEQSA make use of existing data collections and quality assessments for universities seeking re-registration in the Australian University category.

These data collections include the regular collections by the Department of Education, Skills and Employment (DESE) including the annual Higher Education Research Data Collection and data provided by universities for the ERA and Engagement and Impact exercises. Use of these existing data sets reduces duplication of effort, and increases consistency and certainty.

USE OF ERA RESULTS

Universities Australia supports using results from the Excellence in Research for Australia (ERA) for re-registration purposes. ERA is an accepted mechanism to provide information about the quality of research undertaken by universities.

However, Universities Australia notes that a review of the ERA and the Engagement and Impact exercises has been conducted, but the outcomes of that review are not yet known. Therefore, Universities Australia's comments on the use of ERA need to be considered provisional until any revisions to the ERA methodology are confirmed.

Given ERA uses citation information, publication quality and peer review to analyse and benchmark research quality in Australian universities, Universities Australia urges TEQSA to use the ERA outcomes as its primary mechanism for re-registration assessments. Collecting additional data or conducting further peer review for institutions assessed under the ERA exercise would appear to be unnecessary duplication.

Universities Australia acknowledges that prospective entrants to the Australian University category would need to be provided with a pathway into the category. This could be achieved with an individual assessment based on the ERA methodology, to demonstrate equivalence of research quality.

ADDITIONAL METRICS

Universities Australia is concerned that points A and B in the draft appear to advocate for metrics to be collected by TEQSA in addition to those provided by universities for ERA purposes. As noted above, there is a danger of duplication of data provision. Several cycles of ERA have now been undertaken and the results are understood and respected. Additional metrics for institutions applying for re-registration in the Australian University category are therefore not required, and Universities Australia advocates that the proposed legislative instrument should not include Points A and B.

As noted above, a pathway for prospective entrants to the category could be based on ERA methodology.

If TEQSA does choose to collect additional data, Universities Australia would seek further information about the basis on which that information would be assessed.

If additional metrics are considered, then Universities Australia urges that any unintended consequences are carefully considered. These include taking into account differences in output practices between different disciplines, and the different discipline mixes across Australian universities. Some disciplines have more non-traditional research outputs than others.

Another is how research focused on Australia, primarily published in Australian journals or through non-traditional outlets, is assessed against work that is published internationally and through more

traditional channels. There also needs to be consideration about how measures would impact researchers identifying their work in the new Indigenous Field of Research codes.

INSTITUTIONAL INFORMATION

Universities Australia supports the elements covered by the Threshold Standards with regards to a research policy framework. Point D in the draft legislative instrument addresses an institution's research governance framework. However, clarification is required about what is intended by including 'financial support for the pursuit of research'. An understanding of a university's financial strategy to support research over the period of registration sought would be appropriate as part of the registration or re-registration process. However, Universities Australia would be concerned if this element asked for budget information. A rewording of the point could provide clarification.

Point E that addresses research community measures raises some important differences between what might be required for re-registration compared with an institution seeking entry into the Australian University category for the first time.

Universities Australia supports the intent of the measure – that is, to establish that a minimum research workforce is employed by the institution applying for registration as an Australian university. For new applicants to the Australian University category, this is appropriate. Universities Australia suggests that prospective new entrants to the Australian University category should also be asked to demonstrate workforce development pathways, given the national importance to develop and maintain a high-quality research workforce.

However, Universities Australia would advocate that for existing Australian universities, either the ERA exercise or data provided to the DESE would be sufficient to establish whether a threshold has been reached for a research community. The difference between the collections is that the postgraduate student cohort is not included in the ERA exercise, but information about this group is collected by DESE.

COMPETITIVE RESEARCH GRANT DATA

Point F addresses success in competitive research grant programs. Given this is included in the ERA exercise, Universities Australia advocates that it is not required for institutions seeking re-registration. It is unlikely to apply to institutions seeking initial registration, given eligibility requirements for such funding. If it is to be a stand-alone measure, then Universities Australia would seek information about how success will be measured, and how discipline differences would be managed.