

## TEQSA consultation on draft legislative instrument

28 April 2021

The Australian Technology Network of Universities (ATN), in collaboration with The University of Newcastle, welcomes the opportunity to contribute to the consultation on the legislative instrument regarding quality of research at universities.

ATN is the peak body representing Australia's five most innovative and enterprising universities: Curtin University, Deakin University, RMIT University, University of South Australia (UniSA), and University of Technology Sydney (UTS). The University of Newcastle is an important research-intensive anchor institution in the regional gateways of the Hunter and Central Coast. Together, we are home to over 300,000 university students and over 23,000 full and part-time staff.

The matters outlined in the draft legislative instrument broadly capture the types of activities associated with research at universities. Any university in Australia should be able to demonstrate a record of consistent achievement in these areas. Indeed, many of the matters listed are already captured in existing national assessment and data collections and TEQSA should draw on these wherever possible and utilise the same definitions and metrics.

We encourage an acknowledgement and appreciation of industry-engaged research that does not necessarily have the same goals of publication and citation in peer-reviewed journals. This is important not only in the light of the Government's focus on the commercialisation of university research, but also as a long-standing and valued part of our university system that is essential for national economic and social progress.

### Our suggestions and comments are summarised here:

1. Recognise industry-engaged research and social impact
2. Focus on governance and use existing data wherever possible
3. Define and clarify key terms
4. Specify thresholds and their application
5. Clarify other matters not specified
6. Outline proposed process and timeframe

### 1. Recognise industry-engaged research and social impact

The volume and quality of citations and the peer-reviewing of publications are important aspects of any Australian research and deserve their place. However, if we as a sector are to encourage and enable industry-engaged research, commercialisation and social impact, then they must be reflected in what it means to be a university. This is not to say that every university will have the same focus or depth or breadth of activity in these areas – only that it will be a greater priority for some universities.

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The universities and researchers that focus on this area often have to weigh up the impact this will have on their other outputs (e.g. patents preferred over journal papers, social impact over academic recognition). It would assist them if their efforts and outputs in industry-engaged research, commercialisation and social impact were recognised and appreciated alongside more traditional metrics. The Australian Research Council's (ARC's) Engagement and Impact Assessment (EI) already captures some of this activity.

This focus could be implicitly part of several of these matters (e.g. governance framework for research, research community, other direct funding for research). However, if citations and publications are explicitly identified then these other areas should be as well.

## **2. Focus on governance and use existing data wherever possible**

Most of the matters listed are appropriately focused on the right level – that is, on the university having the appropriate governance mechanisms for a self-accrediting institution. Where there are other existing mechanisms or processes for the assessment of a university's operational activities, they should be used to appropriately inform TEQSA's assessment.

In contrast, the volume and quality of citations and publications appears to be more of an operational requirement, and it potentially overlaps with the results from Excellence in Research for Australia (ERA). This is particularly pertinent as the outcome of the ARC's review of ERA and EI is not yet known. Ensuring there is coordination and alignment with that process would be welcomed, as with the Government's position on research translation and commercialisation.

Perhaps instead TEQSA's focus should be on the university's strategy for research outputs, including their focus on encouraging, measuring and assessing their own output (e.g. citations, publications, patents, licences, commercial activity, partnerships, social impact).

The reference to ERA or any comparable evaluation suggests that TEQSA will seek to use existing data sources (e.g. departmental administrative collections) where possible. We would like to take this opportunity to strongly encourage this practice in TEQSA's assessments. In particular, this should include publicly available citation analyses, Higher Education Information Management System (HEIMS) data, Australian Research Council (ARC) grant data, and Higher Education Research Data Collection (HERDC) data.

## **3. Define and clarify key terms**

We appreciate the need to be sufficiently broad in order to cover a diversity of practices and reduce the need to revise the instrument too frequently. However, this instrument uses several terms not defined here or elsewhere that may be open to interpretation, including:

- researcher
- research community
- engaged in the research community
- supervisory and study environment.

This has potential material impacts on what type of affiliations qualify a researcher to be a member of the university's research community.

Where possible, the instrument should either define its terms or use terms consistent with those defined elsewhere (such as the *Higher Education Standards Framework (Threshold Standards) 2021* or *Higher Education Support Act 2003*) and as collected in other data sources (such as HEIMS data).

#### **4. Specify thresholds and their application**

We note that TEQSA indicates that the proposed legislative instrument “does not specify benchmarks or thresholds for quality”. The Threshold Standards state that:

*Note: In assessing the research requirements in criteria B1.3.16-19, TEQSA may specify the matters to be considered in a legislative instrument. TEQSA will use existing national research benchmarking exercises where they are applicable. Where they are not applicable, TEQSA will benchmark against standard research indicators.*

The Threshold Standards also specify “benchmark standards” for research requiring:

- a. research that is ‘world standard’ measured using best practice indicators, and/or
- b. research of national standing in fields specific to Australia, in the case of research that is not easily captured by existing standard indicators.

While the specification and application of these benchmark standards is relatively straightforward in some areas (e.g. results for ERA), it is less clear in others (e.g. governance framework for research). The requirements in the Threshold Standards are expressed in terms of fields of education, which may apply to some areas, but not in others.

The relationship between the legislative instrument and the Threshold Standards should be further articulated, as well as how any benchmarks or thresholds would be decided, indicated and applied.

#### **5. Clarify other matters not specified**

We note that TEQSA indicates that the proposed legislative instrument is “non-exhaustive”. This suggests that there are matters other than those specified in the instrument that may be taken into account when assessing the quality of research.

Further clarification is needed on what other matters (or at least the categories or outcomes) may be considered, how they will be notified or indicated, what is the criteria for considering these other matters, and what would merit their later inclusion to the instrument.

#### **6. Outline proposed process and timeframe**

We welcome the consultation on the draft legislative instrument and encourage further consultation and clarification on the proposed timeframe of the implementation, and any next steps in the consultation and implementation process following this consultation.

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