

Australian Catholic University

Feedback to the Tertiary Education Quality and Standards Agency (TEQSA)

Consultation: Draft Legislative Instrument – Assessment of Research Quality at Australian Universities

April 2021

Feedback to TEQSA Consultation on Draft Legislative Instrument – Assessment of research quality at Australian Universities

Australian Catholic University (ACU) acknowledges the opportunity to provide feedback to TEQSA on its draft text for the proposed legislative instrument setting out the matters relevant to the assessment of research quality at Australian Universities.

ACU notes this reform process is taking place further to the passage of the *Higher Education Legislation Amendment (Provider Category Standards and Other Measures) Bill 2020*, which gives effect to the recommendations arising from the Coaldrake Review. The legislation permits TEQSA to make a determination on the matters which it must have regard to when assessing the quality of research undertaken by Australian University category providers, or providers applying to be registered in this category.

Overall, ACU is concerned the Draft Text lacks sufficient detail, particularly with respect to the definition of key terms and benchmarks or thresholds for research quality. ACU further notes TEQSA has indicated the list of matters relevant to the assessment of research quality set out in the Draft Text “is non-exhaustive”.¹

It is important that Australian Universities, and providers aspiring to enter this category, have clear advice on how TEQSA will assess their research activities and the scope of assessments. Fundamentally, there should be transparency in what matters will be taken into consideration in regulatory assessments. This should all be clearly set out and defined in the legislative instrument.

Feedback on specific issues raised in the Draft Text and recommendations are provided below.

Volume of citations and quality of publications

Points (a) and (b) of the Draft Text refer to citations, publications and journal papers.

Higher Education in Australia and internationally has a long-standing practice of also viewing non-traditional research outputs (NTROs) as legitimate vehicles for original learning, and as outputs that can be evaluated via various quality measures. NTROs include original creative works, research reports to external bodies, curated or produced substantial public exhibitions and events, and portfolios.² The legislative instrument should normalise this practice by defining outputs as more than just publications, to also include NTROs.

ACU recommends amending the Draft Text to extend the list of research outputs to include NTROs.

Furthermore, in Point (b), the provision concerning “where” the peer review has taken place should either be clarified or omitted. It is unclear what this provision is referring to and which research activities it would seek to give lesser or greater weighting to in assessments. For instance, it may be referring to peer review internal to a university which legitimately may be problematic, or it may be referring to favouring international peer review over peer review amongst Australian academics. The latter would disadvantage some disciplines.

To avoid ambiguity, ACU recommends omitting the words “where peer review has occurred” from the Draft Text. The existing provision to consider “the nature of peer review” sufficiently covers this matter.

¹ TEQSA. (2021). *Consultation: Draft legislative instrument*. <https://www.teqsa.gov.au/consultation-draft-legislative-instrument>

² The Australian Research Council provides further details on NTROs and how they are evaluated.

Results from national and/or international assessments of research

Point (c) indicates TEQSA would assess “results from Excellence in Research for Australia or any comparable evaluation in Australia, and from comparable national and international research assessment exercises”.

This provision is too vague. The term “comparable” is problematic in the absence of a clear understanding of who makes the comparison. For instance, would TEQSA make the comparison, or would an institution be required to make a submission to TEQSA to establish the comparability of a research assessment exercise.

ACU seeks further clarification on Point (c), particularly on:

- who has responsibility for identifying comparable research assessment exercises; and
- which national and international research assessment exercises would be relevant to TEQSA’s assessments.

Research community at the regulated entity

ACU broadly supports the provisions in Point (e). In particular, sub-sections (ii) and (iii) would promote a practice of ensuring researchers are part of an institution’s research community, and could serve to enhance the academic culture at universities. However, greater clarity could be provided on what falls within the scope of “research community”, “research activity” and “researcher”. Consideration could also be given to how this intersects with TEQSA’s observations and assessments of scholarly activity at Australian Universities.

ACU recommends amending the Draft Text to include definitions of the terms “research community”, “research activity” and “researcher” with respect to Point (e).

Success in competitive research grant rounds and other direct funding for research

Point (f) would require TEQSA to consider the “success of the regulated entity in competitive research grant rounds and other direct funding for research.”

In this provision, “success” could be more clearly defined. ACU notes the Federal Government’s priorities to encourage and strengthen university-industry research partnerships and to improve university research commercialisation and translation.³ To support these priorities, Point (f) could make it clear that Category 2, 3 and 4 research funding is included within the scope of determining how “success” is defined.

ACU recommends amending Point (f) to articulate that Category 2, 3 and 4 research funding is included in assessments of “success” with respect to this measure.

³ For instance see: The Hon. Alan Tudge MP, Minister for Education and Youth (26 February 2021). ‘Lifting the impact of universities to strengthen Australia’s future’. Speech delivered at The University of Melbourne; and Department of Education, Skills and Employment. (2021). *University Research Commercialisation*. <https://www.dese.gov.au/urc>