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Regional Universities Network
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22 April 2022

The Regional Universities Network (RUN) welcomes the opportunity to comment on the Australian Research Council's (ARC) Excellence in Research for Australia (ERA) 2023 Benchmarking and Rating Scale – Consultation Paper.

RUN is a national collaborative group of seven regional Australian universities: Charles Sturt University, CQUniversity Australia, Federation University Australia, Southern Cross University, University of New England, University of Southern Queensland, and University of the Sunshine Coast. This RUN submission does not prohibit RUN universities from making their own submissions addressing in detail any specific issues they wish to explore with the discussion paper. It should be noted that RUN is supportive of the submission from Universities Australia.

Overview

Following a review of the proposed options outlined in the ERA 2023 Benchmarking and Rating Scale – Consultation Paper, RUN has several concerns regarding the immediate implementation and broader impacts of the suggested options. RUN does not support either of the proposed options. Our concerns are outlined in further detail below. RUN recommends that the existing ERA evaluation framework be maintained for continuity and that option A is run concurrently with the ERA 2023 exercise to provide the opportunity for further refinement, sectoral understanding, and feedback on the proposed option.

It is to be expected, given the international performance of Australia's universities on global research rankings that Australia's universities on the ERA benchmarking scale would increase the quality of their research over time. However, ERA is not, and was not designed to be a ranking, rather it is a national research evaluation framework aimed to identify and promote excellence across the full spectrum of research activity occurring within Australia's higher education institutions. ERA aims to identify excellence in research by comparing Australia's university research effort against international benchmarks; create incentives to improve the quality of research; and identify emerging research areas and opportunities for further development. The proposed changes outlined in the consultation threaten to undermine the intentions of ERA while also risking the perception of how Australia's research is viewed both domestically and internationally. The proposed changes will fundamentally change ERA, potentially resulting in significant reputational damage to the sector by downgrading outstanding Units of Evaluation (UoE) in the search for "world leading" research within Australia, while simultaneously failing to present a rigorous, supportable, and well-defined definition of "world leading".

Any change that could have a potential damaging impact on the perception of Australia's research sector needs to be carefully considered, modelled, and reflected upon. It is in the best interest of Australia for universities to fully understand the impacts of the proposed changes before rushing to implement them. As such RUN suggests concurrently running ERA 2023 with the existing benchmarking arrangements and the proposed options, so the proposed changes and their impacts are better understood.

RUN does not support the combining of ERA rating scales 1 and 2 as proposed in Options A and B as universities use these metrics to identify new and emerging disciplines and they are important in tracking the development and maturity of these disciplines. ERA was not designed for and should not be used solely to focus on the upper echelon of research excellence, rather ERA should continue to drive excellence across the full spectrum of Australia's research.

The desire, rightly or wrongly, to chase a small number of elite research fields risks undermining Australia's stellar research reputation and risks reducing ERA to an ineffective and unimpactful exercise that has no relevance to industry, international partners, universities, and the communities which universities serve.

The proposed ERA ratings provide greater focus on a few high performing units of research. This shift does not align with the overall purpose of the ERA ratings and may lead to broader reputational impacts across Australia's research sector. Without further consideration of the rating scales, ERA will miss opportunities to provide meaningful recognition of new and emerging research. It is important that ERA maintains a rating scale, as opposed to a ranking scale, so it may continue to be utilised as a tool for driving research collaboration, development, and improvement across all of Australia's excellent research bodies.

Options for a more granular rating scale

RUN is not supportive of either model being implemented in their current form due to inconsistencies in language, lack of modelling, lack of granularity below the "world standard" categories, and lack of opportunity to identify emerging research areas and/or areas for development.

Of the two options presented, Option A is conditionally the preferred option, however RUN recommends that further modelling be undertaken and that a reformed and more complete Option A be trialled concurrently with ERA 2023. RUN is concerned by the shift of focus away from sectoral research excellence towards a focus solely on the elite, noting there is an optical and reputational risk of having "world standard" listed as the second lowest category.

The nomenclature of Option B is currently unclear and at present RUN could not recommend this option in any form as it would be irresponsible to recommend the adoption of an option that requires additional development. The categories of Option B place greater focus on recognising high performing institutions – rather than reflecting the breadth of work and developing research being undertaken across the country. Option B risks undermining Australia's collective research excellence in pursuit of identifying Australia's elite research performance. It is noted that there are already several international research rankings that Australian institutions are involved with that provide an opportunity for global comparisons.

RUN notes the proposed evaluation framework options lose granularity for ratings that are emerging or are not high performers. From the ERA 2018 rating scale, ratings 1 and 2 should not be combined as universities use this metric to identify new and emerging disciplines and are important metrics as the discipline matures. The focus on increasing granularity should not come solely at the expense of below "world standard", rather if there is to be increased granularity it should occur across the full spectrum of ERA ratings with clearly defined categories that are fully understood by institutions, and other stakeholders.

It is recommended that further modelling be undertaken to define and clarify the characteristics for the ratings, as the terminology and language used is currently unclear and could also adversely isolate or deter institutions from creating and/or investing in new or emerging research areas. The descriptions in the proposed rating scale options may over-simplify the work being undertaken by institutions, for example: "not at world standard" does not provide the level of clarity or information we would expect from ERA. For Option A, maintaining the current ERA 1 and 2 rating categories would be an appropriate compromise, providing increased granularity while also ensuring institutions are able to understand appropriate context for emerging and developing research opportunities.

It should be noted that Australia's universities all strive for continuous improvement regarding their research quality. Australia's research environment is highly competitive, and institutions utilise considerable resources to monitor and model the performance of their research outputs. The changes proposed to ERA will not fundamentally change the way in which universities strive for research excellence other than requiring universities to undertake significantly costly reforms to their monitoring and modelling systems. The proposed changes are likely to result in universities undertaking increasingly difficult internal decisions regarding scarce university resources to focus on areas of research that will return the greatest ERA return.

How the citation metrics and peer review indicators support the options for a revised rating scale

The intent of the new peer review measures is to support the use of the rating scale and improve alignment between peer review and citation analysis, however the proposed changes do not improve alignment between peer review and citation analysis. Rather the proposed methodology drives that separation further apart. The peer review methodology requires recalibration and will not fit the purpose for future ERA rounds. There is an opportunity to introduce a robust methodology where both peer review and citation can be measured in parallel.

There are opportunities to improve the peer review methodology, such as increasing transparency and providing de-identified reports from peer reviewers and RECs to universities. It is recommended that peer reviews be aligned with one or more quality indicators or metrics-based systems, to ensure a robust and fair assessment. Another suggestion is to establish an observer program (similar to the NHMRC grants program) for research administration staff to attend REC meetings and gain an understanding of how peer review reports are utilised by RECs and what type of research practices are valued. With the introduction of any new methodologies, the need for training is paramount, especially training regarding what is considered "world standard", such as using exemplars and highlighting why an output in that Field of Research (FoR) would be a world leader.

Regarding the use of high-performance indicators (HPI), it is noted there is inequity if not measuring like-for-like research entities, such as comparing universities against industry-based facilities and it is unclear how this will be resolved. Further, there is no detail pertaining to how the HPI methodology will address when FoRs do not have the proposed minimum of least 10 organisations. This is another example of where additional explanation would be appreciated and required before RUN could support the proposed methodology.

While the use of dynamic relative citation impact (RCI) classes is understood, the methodology behind the dynamic RCIs makes it difficult for universities to use especially in the absence of a full data set. Further consultation between the ARC and universities would be welcomed.

The proposed guidance for Indigenous studies needs to ensure any research is not disadvantaged. This could be improved with additional guidance provided to support Indigenous studies. The use of ratings and language such as "world leading" and/or "not at world standard" do not necessarily provide the intended benefits for Indigenous research. It is recommended further emphasis be provided on the quality of outputs compared to research of other First Nations peoples around the world, or research already conducted with Indigenous peoples in Australia.