



The Regional Universities Network (RUN) provides the following comments in response to the request from TEQSA for feedback on the draft legislative instrument proposed for the *Higher Education Legislation Amendment (Provider Category Standards and Other Measures) Bill 2020*, which outlines matters which the body must have regard to when assessing the quality of research undertaken by a provider which is registered, or applies to be registered, in the Australian University category.

General comment

RUN welcomes the broad nature of the scope proposed in the draft legislative instrument for the matters to be taken into account by TEQSA to assess research at a university. The inclusion of matters relating to the research environment at the relevant university is important.

Our main suggestions are that:

- Quantitative measures should be moderated/normalised for the size of the relevant university and the relevant discipline.
- A focus on publications only in peer reviewed journals may have the unintended consequence of discouraging innovation, translation and commercialisation, which are important to the government's agenda. Publications with industry and non-traditional research outputs should be taken into account. The impact, and translation/commercialisation of research should be considered, including with respect to the impact on regional economies/local government areas.
- Data used should be drawn from existing data collections.

Specific comments against the proposed text

- a. the volume of citations, and the quality of the publications in which those citations occurred for peer reviewed journal papers.*

The volume of citations should not be used too bluntly – it must be constrained within the context of the discipline and institution.

Citation volume should be normalised for the size of the university in question. A measure such as the percentage of research productive staff per FTE staff in higher education at an institution would be appropriate.

International standards which use field-weighted citation impact provide a suitable model to follow to take into account differences between disciplines. Relying on citation alone would bias against disciplines which do not naturally rely on citation based metrics, especially in the HASS disciplines. These disciplines do not have broad coverage in Scopus/WoS databases for example, and some fields (e.g. creative arts) publish via non-traditional research outputs.

Acknowledgement of engagement and impact of research is important, particularly in the context of the government's commercialisation agenda.

Commercial publications and publications with social impact should be taken into account, including those jointly authored with industry (universities have this data).

- b. *Whether publications have been peer reviewed and where peer review has occurred, the nature of the peer review process and the results of that process.*

As for a.

As well as publications, non-traditional research outputs should also be included.

- c. *Results from Excellence in Research for Australia, and any comparable or any comparable evaluation in Australia, and from comparable national and international research assessment.*

While results from ERA are important and should be assessed, they should not be the only source of information for TEQSA's consideration.

Measures of engagement and impact are also significant and should be included (e.g. the next Engagement and Impact assessment exercise). The economic and social impact of a university within a region should be considered.

Sustainability assessments of universities are also relevant.

- d. *The regulated entity's governance framework for research including:*

- *Its policy framework for research*
- *Its financial support for pursuit of research*
- *Whether and how the governance framework for research is implemented.*

- e. *The extent to which there is a research community at the regulated entity, including:*

- *The number of researchers at the regulated entity*
- *The relationship between individual researchers and the regulated entity*
- *The extent to which research at the regulated entity is current or recent*
- *The supervisory and study environment for research activity at the regulated entity.*

We welcome the broad nature of this assessment but suggest that definitions are provided e.g. with respect to what constitutes the “research community”.

Consideration of the financial support for pursuit of research and the number of researchers at the regulated entity should be normalised for the size of the university in question. A measure such as the percentage of research productive staff per FTE staff in higher education at an institution would be appropriate to moderate the financial support and number of researchers.

f. the success of the regulated entity in competitive research grant rounds and other direct funding for research

As outlined in the response to *a*, there needs to be moderation for the size of the institution and the relevant discipline.

Other

Advice is sought as to how mapping will be conducted by TEQSA from the Fields of Research assessed by ERA to the Fields of Education referred to in the final report of the Review of the Higher Education Provider Category Standards.