

7 September 2022

The Regional Universities Network (RUN) welcomes the opportunity to comment on TEQSA's draft Guidance Note: Research requirements for Australian universities.

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.

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## Overview

RUN supports the need for further guidance with respect to meeting research requirements. In relation to the draft Guidance Note on Research requirements for Australian universities, further information regarding the implementation and the assessment methodology are required. RUN's considerations and recommendations for improvement are outlined as follows.

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## Benchmark Standards

The Guidance Note aligns with the Excellence in Research for Australia (ERA) assessment as a benchmark standard. Following the announcement of the Australian Research Council (ARC) Review, it was advised that the ERA evaluation round will not be undertaken in 2023. RUN recommends the approach be reconsidered until such time when the proposed new data driven approach to ERA is made available in preparation for implementation in 2024-25. Clear timelines for the implementation of TEQSA's Guidance Note, and the pending development of the new ERA approach, should be established and communicated to the sector.

The Guidance Note suggests the ARC's Engagement and Impact (EI) exercise will be used as a research quality indicator. However, as the EI exercise does not have a world benchmark, it is not clear how it will be used to measure World Standard, nor how it will be reconciled and balanced with ERA results. Further information is required to explain how ERA and EI results would be consolidated by fields of education for assessment, as addressed in the Attachment A; Concordance Table section found below.

TEQSA will allow universities to provide a range of evidence other than ERA, to demonstrate how they meet the benchmark standards. At this stage, there is no clear indication from the Guidance Note of what TEQSA determines to be sufficient evidence. RUN seeks greater clarity regarding the types of evidence required to support and demonstrate an institution's competence against these indicators. As indicated in the Minister for Education's letter of expectation to the ARC it is noted that the sector has broad concerns regarding workload<sup>1</sup>. RUN cautions against creating additional bureaucracy of quality assurance for research at an institutional level, when the Government's intention is to reduce the bureaucracy of research assessment at the national level. RUN would suggest TESQA provides models of best practice to guide universities in reducing institutional bureaucracy and to assist in their own continuous improvement and development initiatives.

There are concerns regarding inconsistencies of the definition of 'World Standard'. RUN recommends that the same methodology be adopted by TEQSA and ERA 2024-25 to define 'World Standard'. Without knowing the details of the revised ERA assessment, a clear definition of 'World Standard' using other metrics (citations, income, world rankings) could be pursued as an alternative option. The use of international ranking systems could also be considered.

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<sup>1</sup> <https://www.arc.gov.au/about-arc/Governance>

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## Potential Issues

The Guidance Note highlights the concerns of overreliance on certain project, sub-fields, or researchers as a potential issue. It should be noted that for smaller institutions such as regional universities, there may be fewer available resources but that does not equate to a lesser quality of research. RUN cautions TEQSA to not penalise quantity over quality of expertise. Consideration could be given to applying a threshold that would ensure quality is measured based on an institution's critical mass of activity in a discipline.

Other potential issues noted by TEQSA include the lack of external scrutiny or peer review of research quality. RUN supports the use of world citation benchmarks as appropriate measures of the quality of Australian research. RUN also supports the use of citation analysis in relevant discipline areas as peer review is a subjective analysis of research quality. Previous ERA results based on peer review have demonstrated that such disciplines rate lower than the metric-based citation analysis discipline areas. If peer review is to continue to be used, it is recommended a blind peer review process is considered.

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## Attachment A: Concordance Table

RUN recommends further consideration regarding the concordance table, noting that attempting to align broad fields of education with fields of research at a four-digit level is too complicated and granular. If ERA is being used as the quality indicator for the field of research, RUN recommends a two-digit level be used for the benchmark.

The application of the concordance table has raised several questions from RUN members, including:

- how the World Standard would be assessed?;
- what happens where there are multiple results against a field of education?; and,
- will a method be developed to determine the results?

For RUN to understand the impact of the research requirements, more detail is required. An example is that it has not been specified how the field of research percentage is calculated. One field of education may have multiple fields of research codes accessed – some above and some below World Standard. How examples like this will this be aggregated as one indicator requires further explanation. RUN recommends TEQSA provide a clear assessment methodology.