



Australian Government

Department of Education, Science and Training

Research Quality Framework

RESPONSE TO THE ISSUES PAPER

March 2005

THE RESEARCH QUALITY FRAMEWORK

Response to the Issues Paper – How to Make a Submission

This submission template should be used for responding to the Issues Paper for the Research Quality Framework.

How do I make a submission?

You should use this template to make a submission to the consultation process. The sections in the template correspond to the numbered sections in the Issues Paper and the propositions posed in the Issues Paper are repeated in the template. Please provide your responses to the questions in the relevant spaces on the pro forma.

It is not necessary to respond to all the issues, only those propositions for which you have views. If you choose not to respond to some propositions, please do not delete the boxes; just leave them blank.

If you have additional ideas or comments on areas not addressed in the Paper we would welcome those at the end of your submission.

What contact details are required?

The template also includes a cover page for you to complete your contact details. This cover page can also be found as an attachment to the Issues Paper. We require these details to verify submissions.

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Emailed submissions must include your name, phone number and postal address so we can verify them. All submissions must have an original signed cover sheet sent to DEST.

For organisations

If the submission is from an organisation, please indicate this on the cover page of your submission. Include the signatory's position, and at what level the submission was authorised. All submissions must have an original signed cover sheet sent to DEST.

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The Submission Template is provided in Word, PDF and RTF formats.

If you are unable to access or use the template, please contact the Research Quality Assessment Framework Team at rqf@dest.gov.au or by phone to 02 6240 8041 for a copy. Alternatively you can copy the questions into a new document and enter your responses into that document. Please ensure, however, if you do this, that you save the document in a format that is PC-compatible. Please ensure also that you include a cover page with your submission, as we are not able to accept submissions without the relevant contact details and signature.

Will my submission be published?

Submissions will be published electronically at <http://www.dest.gov.au/resqual/default.htm> . Individuals may request not to have their details made public. A report analysing the submissions will be prepared and submissions will be referred to by number. If you make a submission on behalf of an institution and do not want the institution to be identified, please indicate this on the cover page.

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Where do I send my response?

Please email your responses to rqf@dest.gov.au.

If you are not able to email your response you can send a hard copy to:

The RQF Submissions Officer
Research Quality Assessment Framework Team, Loc. 767
Innovation & Research Systems
Department of Education, Science and Training
GPO Box 9880
CANBERRA ACT 2601

Or by fax to (02) 6123 5717

Submissions sent by email or fax will not be considered valid until an original signed cover sheet has been received by DEST.

The closing date for submissions is **COB (6pm) Monday 2 May 2005**.

If you have any questions or problems with the template, please contact the Research Quality Assessment Framework Team at rqf@dest.gov.au or on (02) 6240 8041 or (02) 6240 5415.

THE RESEARCH QUALITY FRAMEWORK (RQF)

Responses to the Issues Paper – Submission Cover Page

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Is the submission made on behalf of an organisation? (Y/N)

Y

If No:

<p>A report on the outcomes of this submission process will be prepared by the Department and/or external consultants which will be made publicly available on the Department's website. Quotes may be used from submissions in this report. Do you consent to being identified in a report?</p>	
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If Yes:

Name of Organisation	The University of New South Wales				
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<p>A report on the outcomes of this submission process will be prepared by the Department and/or external consultants which will be made publicly available on the Department's website. Quotes may be used from submissions in this report. Does the organisation consent to being identified in a report?</p>	Yes
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Please ensure that all details on this page are completed. Submissions made on behalf of an organisation will not be accepted without authorisation from an appropriate person within the organisation.

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RESEARCH QUALITY FRAMEWORK (RQF)

Responses to the Issues Paper

Part 2: Creating an Australian RQF

Please indicate your response by placing an X in the relevant box.

2.1 Structuring an RQF

Issue 1: How should an RQF be applied to universities and publicly funded research agencies?

(a) An RQF should be applied in the same way to both universities and publicly funded research agencies.

Strongly agree Strongly disagree No comment

Somewhat agree Somewhat disagree

(b) Within the university sector, an RQF should be applied differentially to specific types of institutions.

Strongly agree Strongly disagree No comment

Somewhat agree Somewhat disagree

Additional comments

1. The Issues Paper does not adequately define the purpose of the RQF. Without a clearly defined purpose it not reasonable to expect institutions to simply “tick-a-box”.

Putting the issue of allocating resources aside, the purpose of the RQF should be to achieve the best research outcomes for Australia. **Research excellence** must be the focus of the exercise.

2. The RQF should be applied to universities and PFRAs against criteria that measure (i) research quality; (ii) relevance; and (iii) research impact (in that order) while recognising their different missions. The criteria should stand independent of changing fashions or priorities of research.

3. **The RQF exercise needs to be done properly** if it is to be recognised as a credible, defensible exercise which has merit nationally and internationally. This means that Australia must be able to adequately benchmark its **research excellence** internally, nationally and internationally. This would be a thoroughly pointless exercise if it is light and superficial and Australia’s reputation in research is at risk if we don’t set up a rigorous RQF.

4. If the RQF is truly a measure of Australia’s research excellence, then it must find a way of covering and measuring **all** of the research being undertaken in a consistent manner. While it is recognised that universities and PFRA’s have fundamentally different missions, excellence is excellence when it comes to research. **The underlying principles of the framework must apply equally to universities and PFRAs.**

5. Within the university sector, **research excellence at all institutions should be measured**, irrespective of the nature of the institution. This is especially important if resource allocation is tied to the outcomes of the assessment, which in itself will recognise the diversity of institutions.

2.2 Defining and measuring research quality and impact

Issue 2: Research quality and impact should be assessed by appropriately constituted panels.

- Strongly agree Strongly disagree No comment
- Somewhat agree Somewhat disagree

Additional comments

1. Note that this issue refers to assessment of research “quality” and “impact”. These are both dimensions of **research excellence**. We would reiterate that the primary objective of the RQF should be to assess research *excellence* across all of its dimensions.
2. While it is agreed that research excellence should be assessed by panels, it is not possible to lend strong support without adequately defining **“appropriately constituted”**.
3. Assessment panels and peer review are important in ensuring that the assessment is done rigorously and to ensure credibility and confidence in the international arena. **“Appropriately constituted” means that reviewers are discipline experts, and that end-users are informed and in a position to properly evaluate the research quality and excellence.**
4. Setting up “appropriately constituted” panels would probably cost the sector an estimated \$50 - \$60 million, based on the ANU exercise and the UK-RAE exercise (pro-rated). Research excellence assessed by **“appropriately constituted” panels is an expensive exercise.**
5. We strongly recommend that an evaluation of the RQF assessment outcomes should be undertaken as soon as possible to **determine whether the assessment “outcomes” could be overwhelmingly duplicated using more conventional proxy indicators** such as (i) competitive research income/grants; and/or (ii) publications (including patents and other measures of research excellence). When models for RQF are trialled in the 2nd half of 2005, the question as to whether reasonable proxies can be found for a full RQF should be explored.

2.3 Measuring research quality and impact

Issue 3: Assessment panel members should include the following (the categories are not necessarily mutually exclusive):

(a) Experts reviewers able to assess impact in a discipline area/academic field.

- Strongly agree Strongly disagree No comment
- Somewhat agree Somewhat disagree

(b) Expert reviewers able to assess impact more widely.

- Strongly agree Strongly disagree No comment
- Somewhat agree Somewhat disagree

(c) International expert reviewers.

- Strongly agree Strongly disagree No comment
- Somewhat agree Somewhat disagree

Additional comments

1. **Any assessment of research impact should not compromise or lead to a lessening of the assessment of research quality.** Peer review is essential and all assessment panel members (whether they assess research quality, research relevance or research impact in a discipline area/academic field or impact more widely), must be technically competent to assess the activities.
2. An appropriately constituted **assessment panel must contain people who are capable of assessing research excellence.** The inclusion of international expert reviewers is essential on the basis that they are to assess the research excellence in the international context, but should not dominate the Panel.
3. There is no discussion in the Issues Paper on how the constitution of the Panels may be determined. **The constitution of assessment panels should be taken into account in the “Advanced Approaches Paper”.**
4. Care must be taken to ensure that **Panels are primarily there to assess research excellence,** and that they are not dominated by those with specific *parti pris*.
5. Panels must **recognise that the existing peer review mechanisms** of competitive grant funding and peer reviewed publications are in themselves a measure of research quality.

Issue 4: Assessment panels should be informed by metrics whose nature and relative influence may vary across different disciplines.

- Strongly agree Strongly disagree No comment
 Somewhat agree Somewhat disagree

Additional comments

1. It must be recognised that research excellence means different things in different disciplines, and **research “impact” takes time and differs across disciplines.**
2. **Providing panels with appropriate metrics, specific to that panel is essential.** That being said, care must be taken in selecting appropriate qualitative and quantitative metrics, which cover the diversity of disciplines and sub-disciplines within that panel.
3. The number and dollar value of industry donations and industry-funded research contracts should be included in the bibliometric evaluation of research quality and impact. Likewise it is important to include metrics to evaluate research excellence in the Humanities and Social Sciences for example creative works and major exhibitions.

2.4 Measuring research impact

Issue 5 (a): An RQF should recognise research impact through the measurement of different outcomes for different types of research and disciplines.

- Strongly agree Strongly disagree No comment
 Somewhat agree Somewhat disagree

Issue 5 (b): An RQF should recognise the production and diffusion of technology and knowledge as elements of research impact.

- Strongly agree Strongly disagree No comment
 Somewhat agree Somewhat disagree

Issue 5 (c): Where appropriate, users, and those commissioning research, should contribute to the assessment process by providing an external perspective on research under consideration.

- Strongly agree Strongly disagree No comment
 Somewhat agree Somewhat disagree

Additional comments

1. The RQF should **recognise research excellence in different ways**, including research outcomes.
2. It is important, however, to **develop an appropriate balance** between basic, pure and applied research in different discipline areas. Recognising the production and diffusion of technology may not be as relevant for some disciplines as in others, and care needs to be taken in this respect; likewise for those commissioning research.
3. **It is not clear how research excellence will be measured or validated**. The dangers of simply examining the “impact” of research without examining it’s “quality” has recently been publicly demonstrated in the media (ABC Online – 15 April 2005 <http://www.abc.net.au/news/newsitems/200504/s1345732.htm>) where “computer-generated gibberish” was accepted as an academic conference paper. While this is an extreme example, this paper has had tremendous “impact” around the world, but could hardly be called “quality” or “excellent” research. Similarly, being a productive researcher does not necessarily make for a quality researcher.
4. **Quality and excellence should be the main drivers** followed by secondary (including lexicographic) considerations. Weightings should be given to peer reviewed metrics, over and above impact and other measurements assessed by the Review Panels.
5. **Successful research training in itself is a measure of impact on the Australian community**. Contributing to an intelligent workforce must not be forgotten in measuring the impact of research.

Part 3: Applying an Australian RQF

Please indicate your response by placing an X in the relevant box.

3.1 Level of aggregation for assessment

Issue 6: What is the most appropriate level of aggregation for assessment?

- Subject/discipline area
 Research grouping/research team/s
 Department/schools
 Faculties/Divisions
 Institutional level - university/PFRA

Additional comments

1. While it is recognised that individuals (or teams, centres, units, clusters etc of individuals) undertake research within institutions, it is not appropriate to aggregate any assessment on an individual level. The most appropriate level of **aggregation should be based on RFCD codes** or something similar. RFCD codes are already a widely accepted aggregated classification of research activity throughout the sector. When researchers submit an ARC or NHMRC grant, for example, they are already conversant with the “assignment” to RFCD codes.
2. Assessing research excellence based on **RFCD codes would allow for multiple aggregations and immediate benchmarking**, across all institutions. The argument that multi-disciplinary research, or solo stars are excluded if RFCD codes are used is spurious. RFCD codes have the ability to capture cross-disciplinary research and the usual practice is to apportion fractional performance across several RFCDs. Expert Panels in the ARC have been dealing with this issue for many years, and have effective mechanisms in place for assessing with multi/cross-disciplinary research.
3. Using the existing RFCD codes would also minimise part of the high administrative and financial cost of establishing and implementing the RQF, rather than having to develop a new appropriate level of aggregation which is accepted across the Sector.
4. **Traditional subject/discipline and faculty/department/school levels of aggregation are hard to define** across various institutions, because the structure/organisation of institutions differ significantly.
5. **Research grouping/research team/s level of aggregation is similarly hard to define** and can change over time depending upon strategic priorities at different institutions, but would be captured through a subset of RFCD codes.
6. **Aggregation at the institutional is also not appropriate**. The RQF needs to identify, recognise and support pockets of research excellence even if the overall aggregated institutional performance is relatively low.

3.2 Who should be assessed?

Issue 7: Who should be assessed as part of an RQF?

- Eligible staff nominated by institutions (based on guidelines to be provided)
- All eligible staff

Additional comments

1. It is **not possible to determine who should be assessed** without first defining “eligible” staff, and without first determining what the RQF is trying to capture, or its purpose.
2. **There is significant differentiation between institutions as to how staff are formally employed**. Some areas employ academics to undertake primarily teaching and administrative duties, to “free-up” their researchers to research.
3. It is suggested that **the majority of staff (say 80%) be assessed as eligible academic staff** at Level B and above, excluding teaching only staff, casuals, and those not on the pay-roll of the institution, and who maintain a 50% FTE. Level A academic staff are able to participate in independent research, but are generally affiliated within universities with more senior colleagues, at least in part, and so much of their performance would be captured independently.
4. **Care must be taken not to disadvantage early career researchers**. If you are comparing two areas, one full of established scholars, the other with exceptional young staff, the latter may suffer simply because of differences in demographics. This must be avoided.

3.3 Link to training of researchers

Issue 8: The training received by higher degree students in research requires a separate quality audit and/or assessment process.

- Strongly agree Strongly disagree No comment
- Somewhat agree Somewhat disagree

Additional comments

1. **In Australia, Research training is inextricably linked to research**, and needs to be captured in any RQF model. The quality of the research training that is provided, will determine the quality of research and Australia's research reputation in the future.
2. **To exclude the research training performance, simply because it is "difficult" to assess would ignore the crucial role it plays** in research in Australia.
3. **The allocation of research scholarships (APA/IPRS) could be tied to the outcomes of the assessment.** In that way, the country's best research students are being trained in the country's best research environments.

3.4 Focus of assessment

Issue 9: Assessment for an RQF should include a forward-looking strategic element as well as being based on past performance.

- Strongly agree Strongly disagree No comment
- Somewhat agree Somewhat disagree

Additional comments

1. It is impossible to either strongly agree or somewhat agree without further information on how any forward looking strategy is to be measured.
2. It is clear that any institution with strong research must have a strategic plan within which long-term research objectives can be implemented. The AUQA and R&RTMR pick up on many strategic elements relevant to research. **If a forward looking element is to be included then its emphasis or importance should be secondary in the overall assessment of research excellence**, and should be assessed at the institutional level.
3. A clear criticism of the UK-RAE needs to be addressed in the Australian Framework. **Opportunities should be given to support early career researchers and shifts in research focus.** Similarly, opportunities also need to be given to women who are returning to research after family responsibilities. While it is recognised that this could be difficult, the history of individuals and institutions to foster forward-looking strategic elements, such as the nature of ECRs, could be considered.
4. **The assessment of any forward looking strategy should not erode the importance of blue-sky and high risk research.**

3.5 Reporting arrangements

Issue 10: How should the outcomes of an RQF be reported?

(a) Reporting the outcomes of an RQF should be aligned to:

- Subject/discipline areas
- Research grouping/research team/s
- Department/schools
- Faculties/Divisions
- Institutional level – university/PFRA

(b) Reporting on subject/discipline areas within any level of aggregation for the RQF should be aligned to the ABS RFCD codes or an appropriate subset.

- Strongly agree Strongly disagree No comment
- Somewhat agree Somewhat disagree

Additional comments

1. **RFCD codes should be used and aggregated to the institutional level** for reporting purposes.
2. That being said, **institutions should receive back the outcomes at the lowest level of aggregation** for internal management of an institutions research profile according to their own needs and institutional structures.

Issue 11: What should be the format of the ratings/rankings/benchmarks of an RQF? Please provide examples.

1. A matrix, or league table, similar to that used in the UK-RAE should be developed which looks like:

	RFCD Code 1	RFCD Code 2	etc	Total
Institution A	“Internationally competitive”	etc	etc	etc
Institution B	“Nationally competitive”	etc	etc	etc
Institution C	etc	etc	etc	etc
etc				

2. One of the difficulties in using a ranking format, is **where you arbitrarily draw the line**, between say, A and B level institutions. It is possible to have two institutions, almost identical assessment outcomes, but one could be assessed as “A”, while the other “B”, with one just under the line and the other just over.

3. Rankings should be possible at the RFCD level in a qualitative way with word descriptors and should be provided largely with national benchmarking in words such as “internationally competitive”. It should be noted that quantitative international comparisons are very sensitive to local external factors, such as demographics, and this will need to be taken into account.

3.6 Links to funding

Issue 12: The resource intensity required for an RQF should be directly related to the level of funding that it informs.

- Strongly agree Strongly disagree No comment
 Somewhat agree Somewhat disagree

Additional comments

1. While **it is important that the RQF exercise drives significant resources** within the sector for it to have been a worthwhile exercise, the “how” and “how much” needs to be determined prior to the Framework being determined. It is not clear what funding the Government intends to use for allocation purposes with respect to university and PFRA funding, or how it intends to manage this. It is currently not clear that the RQF will drive sufficient resources to justify the enormous effort to undertake a research assessment properly. Until this is clarified, it is not reasonable to shape and form the RQF.
2. The Government **must take into account the real costs of undertaking the exercise** in addition to the resources it drives. The Sector cannot undertake the exercise without proper resourcing, and while the exercise does need to be repeated from time to time, resource costs suggest that the frequency of 5 years would be more than adequate. In the interim, proxies could be used.

3.7 Administrative benefits

Issue 13: An RQF ought to lead to commensurate reductions in reporting requirements for other Australian Government research accountability mechanisms.

- Strongly agree Strongly disagree No comment
 Somewhat agree Somewhat disagree

Additional comments

1. **Reduced reporting requirements would be welcomed.** If the RQF takes into account research training, and future directions, then there is little need for the R&RTMR.
2. If the RQF is to drive significant research resources and the Teaching Quality fund is to drive significant teaching resources, then there is a **possibility of supplanting both the research and research training component of AUQA and the R&RTMR with parallel frameworks.**

OTHER COMMENTS

If you have additional ideas or comments on areas not addressed in the paper we invite you to provide these in this submission.

Before the shape and form of the RQF is determined, there are several issues that need to be addressed:

1. **UNSW wishes to actively participate** in the development of this Framework. We would be pleased to participate in identifying good proxy's to supplement the full review cycle.
2. **UNSW supports the Go8 submission** and guiding principles for the development of the RQF. UNSW also supports the Go8 position on the use of Proxy's.

3. Quality v Impact. UNSW is concerned with the somewhat interchangeable use of the terms “impact” and “quality” as the dimensions of the assessment process. Clearly **the focus of this exercise should be research excellence**. “Impact” is just one component of excellence, and is built into “quality”. It must be recognised that “Impact” is a somewhat nebulous and poorly defined concept and the critical indicators of “impact” are not obvious. A good example on how native title research would not necessarily “impact” on farmers in a positive way, was provided at the Sydney consultation session. It highlighted that care must be taken in using “impact” as a measure of excellence. “Impact” could also be seen as a highly politicised measure, and may depend on the accessibility of the research to have the outcomes “heard”.

4. Timing. There has been insufficient time for full consultation across the sector. The mechanics of submitting a response appears highly controlled and this to some extent seen to be driving the agenda. There is also concern and scepticism across the sector with respect to the timing between the due date for submissions and the Advanced Approaches Paper and National Forum. There is simply insufficient time for DEST to examine and give due consideration to all responses, and develop a Framework proposal.

5. Ties to funding must be clarified and detailed.

6. The frequency of the assessment needs to be determined in conjunction with the amount of funding available for distribution. This further raises the argument for undertaking a sensitivity analysis (perhaps at the end of the first assessment exercise) and examining good proxies to use regularly, with a more comprehensive review less frequently.

7. Relevance of data. The assessment exercise will be a major undertaking if it is to be done properly. If the assessment is undertaken say every 5 years, relying on data that is up to 2 years old (as is the case now), then by the end of the cycle, institutions would be relying on information that is almost 7 years old.

Furthermore, it must be recognised that there is a time lag between assessing quality and assessing impact. There currently exists no valid or reliable indices to measure “impact”, in the same way that quality can be measured. Similarly, it must be recognised that there is a time delay between the uptake of quality research, and its utilisation and the real impact of research may take decades to be realised in some disciplines.

8. Relationship to other Government policy priorities. There appears to be no relationship to the National Research Priorities, to future allocations of APAs/IPRS scholarships or to agencies like the ARC and NHMRC. There also appears to be little connection between the RQF and BAA2, the National Innovation Strategy, NCRIS, or the other policy discussion papers currently under consideration. **The policy objectives of the Government must be well connected, for the sector to have a clear strategic agenda**. Clarification on these points would also be useful in terms of funding priorities.

9. The RQF will drive resource allocation and it will be a **major driver of behaviour** in the sector. Efforts must be taken to proactively avoid undesirable effects observed, for example, in the UK where there was “active trade and transfer” in high-performing star researchers, and disenfranchisement of early career researchers. **Strategic consideration must be given in terms of “what gets measured most, gets done most”**.

10. Non-PRFA research institutes. If one of the aims of the RQF is to actually measure research excellence, then it needs also to encompass other research institutes such as the medical research institutes.