

## IRU submission on quality of research: TEQSA draft legislative instrument

The Innovative Research Universities (IRU) support TEQSA's intention to develop a legislative instrument that outlines matters relevant to an assessment of research quality within the Australian University provider category.

The instrument would be used to support TEQSA's assessment of research quality:

- to reregister an existing university;
- to register a new applicant to be a university; or
- to respond to significant concerns with a university that could lead to its registration being revoked or otherwise limited.

The list of six research matters in the draft text (a-f) adequately covers the breadth of relevant inputs and factors influencing research to support TEQSA reach a suitable conclusion about the quality of research at an Australian university or proposed university.

The key recommendation from the IRU is that the TEQSA require of itself that it will base its assessment of those research matters, wherever possible, on existing research quality exercises and other recognised research data bases. This will improve the consistency and coherence of TEQSA's activities and minimise the administrative burden for all institutions.

For current Australian universities, most key research matters can be demonstrated through data already reported to the Australian Government (citations and quality; peer review; research assessment exercise results; research funding) or through minor changes to data partially reported (research governance; research community). The clearest example is for data and evaluations already provided by the Excellence in Research for Australia (ERA) exercise and the kindred Engagement and Impact Assessment.

For current universities, if the ERA results are sound, TEQSA should be confident that the institution meets the quality criteria.

For institutions seeking to enter the Australian University category, or for current universities where TEQSA has legitimate doubt about the contemporary quality of research conducted, other supplemental analysis may be suitable in each of the research matters identified. Wherever possible these analyses should draw upon currently available and nationally consistent data, such as citation and publication data from Elsevier's SciVal/Scopus database or Clarivate Analytics' Incites/Web of Science database.

### Recommendations

The Innovative Research Universities recommends that:

1. Citation volume and peer review of publications are substantially covered by the outcomes of ERA. TEQSA should merge the first three matters (a to c) into a single matter for peer reviewed output and citations.
2. The draft text for a university's research governance framework (d) is appropriate.

3. The draft text for a research community (e) requires clarity on the ‘relationship’ and ‘engagement’ between individual researchers and the regulated entity.
4. The draft text for research funding (f) is appropriate

## Matters proposed to be assessed

The first three matters proposed should be grouped together starting with the current point c, research assessment exercises, the most important of them. Such exercises will almost certainly incorporate the factors listed at points a and b, and take account of variable applicability of each across different fields of research.

### c. Research assessment exercise results

The IRU supports the use of ERA (or any comparable evaluation in Australia should it be discontinued) as the cornerstone for TEQSA’s research quality matters along with the Engagement and Impact Assessment that considers the question of the translation of research. Citation volume and peer review of publications are substantially covered by the outcomes of ERA.

One of the key areas where ERA is essential is in disciplines where citation impact analysis is unsuitable or not easy to capture from the existing databases. This is why peer review evaluation is applied to certain disciplines in ERA. These decisions are entirely appropriate and should remain the key consideration for TEQSA’s framing of this research matter.

### a. Citation volume and quality of publications

The volume of citations, and the quality of the publications in which those citations occur, is a relevant research matter for disciplines where citation impact is an acceptable proxy for research quality. It is limited in scope for other fields and non traditional research outputs.

For current universities, this is best demonstrated through results and data supplied in ERA. Although ERA is a lagged indicator capturing past research performance, it is likely that universities performing soundly on ERA are achieving similar research impact through their more recent research. Research takes time to gain citations, which is why ERA focuses on past research performance (rather than the most recent years).

If there is a need for further or more recent data, such as for institutions seeking to enter the Australian University category, then citation data from existing sources should be preferred. Elsevier’s SciVal/Scopus database or Clarivate Analytics’ Incites/Web of Science database offer an appropriate source for the volume of citations from publications meeting a specified quality standard.

The restriction to “peer-reviewed journal papers” is appropriate, but TEQSA may consider extending it to conference proceedings indexed in Scopus/Web of Science in appropriate disciplines. Although it is possible to include the volume of citations to other peer reviewed outputs that meet the quality of publication standards, such as books and book chapters from commercial or university publishers, it should not be assumed that the databases capture a majority of citations to these publication types. Even if such books or chapters are indexed in these databases, the publications citing them are often not. Citation analysis (over a recent period) may also not be an appropriate proxy for quality. A

highly cited book or chapter may be a good indicator of research quality, but it may not be appropriate to assume that a lack of citations for a book or chapter indicates poor quality.

#### **b. Peer review of publications**

It is entirely appropriate that peer reviewed publications are the main publications considered by TEQSA and that the nature of the peer review process is broadly defined to capture differences in practices across disciplines and publication types. Double-blinded peer review may be the “gold standard” in fields where articles in international journals are the key outlet for communication, but this may be inappropriate or impractical in fields where books and book chapters for a national audience are the key outlets. Such nuances are understood and incorporated into ERA and in the indexing process for journals and publication types in the Scopus/Web of Science databases.

Publication outlets recognised in ERA or Scopus/Web of Science databases should be considered peer reviewed, having sufficiently demonstrated the “nature of the peer review process and the results of that process”. This would avoid administrative burden and duplication, as well as inconsistencies if publications were considered peer reviewed for citation volume (point a, above) or ERA (point c, above), but not for peer review.

#### **d. Research governance framework**

The draft text for a university’s research governance framework is appropriate. For current universities, their research governance framework is already demonstrated through adherence to funders (e.g. the ARC/NHMRC *Australian Code for the Responsible Conduct of Research*) and specific regulations (e.g. *Defence Trade Control Act (2012) and Guidelines to Counter Foreign Interference in the Australian University Sector*). A basic ‘hygiene check’ governance could be undertaken without significant overhead for existing universities. For institutions applying for registration, or if there are reasons to believe a university has fallen below the required standards, then a more detailed assessment by TEQSA on the stated research governance criteria is appropriate.

#### **e. Research community**

It is important that universities offer a local research community for their staff and research students, in addition to supporting their engagement with their international disciplinary communities. The draft text refers to staffing matters that are appropriate and mostly easy for universities to demonstrate through their annual reporting to government for staffing (e.g. size of research workforce) and HDR students (e.g. supervisory and study environment). Recent research is also readily identifiable through staff publications in ERA or indexed databases, or through research income and reporting to research funders.

However, the text is vague in its definition and purpose for the “relationship” between individual researchers and the university. This is unclear but could be interpreted in as the employment relationship (e.g. full-time/part-time, ongoing/limited-term/casual contract type or honorary/adjunct status). Likewise, it is unclear what TEQSA means by if all researchers are “engaged” in the research community. Amongst other things this could include formal employment status (e.g. teaching & research/research only/teaching only), recent research activity (e.g. recent publications), physical presence on campus or something else.

Although the draft text appears to capture the important elements of a university research community, TEQSA should provide clarity on what it means by “relationship” and “engagement” between individual researchers and the regulated entity.

#### **f. Research funding**

The IRU supports the draft text on research funding success, including its breadth beyond competitive research grant funding to contract and end-user funded research. Universities routinely report research income as part of their activities (e.g. DESE – annual Higher Education Research Data Collection; ERA; ABS Biennial HERD survey; annual reports) while funding bodies will provide data on success rates.

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