

ATN RESPONSE TO RQF GUIDING PRINCIPLES AUGUST 2006

The Australian Technology Network of Universities welcomes the opportunity to contribute to the deliberations of the Research Quality Framework Development Advisory Group. Our universities are committed to the development of an RQF that will work well across the diversity of high quality research currently undertaken within Australian universities and provide our comments in this context. The ATN believes much has been achieved in the development of these principles and the changes they drive to the EAG model. However, as mentioned below, we believe that there remain vital elements as yet unresolved, such as the funding model and the balance it contains between quality and impact. Without these it is difficult to truly assess the key impact of some of the principles.

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Summary of major and critical issues yet to be resolved, and not addressed by the Guiding Principles

1. objectives and development of the *funding model*
2. assessment of *cross-disciplinary* research
3. assessment of *cross-institutional* research
4. consideration of how the proposed implementation will *impact on recruitment* of key staff (i.e. poaching)
5. *cost of implementation*

1. Research groupings

1.1 Who should be assessed?

Option 1: Under the EAG Final Advice, the proportion of total eligible staff and the actual staff included in the research groupings were strategic decisions to be made by the Universities. It is the ATN view that this is the only option which is consistent with the principle of supporting diversity in the higher education sector. It ensures that the RQF exercise is focussed strongly on revealing and celebrating quality research wherever it occurs and supports the strategic development of research concentrations with appropriate scale and focus in different institutions. It also supports the identification of existing and emerging research concentrations by each institution. There is little or no strategic advantage to be gained by encouraging all institutions to develop broad and unfocussed research portfolios which would be the outcome of options requiring either all research active staff to be included in the RQF submission or the submission of groupings for all RFDC codes in which an institution is research active.

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To date, Australian Universities have not reached consensus on a satisfactory definition of 'research active staff', partly because of discipline-specific issues and partly because there is not agreement on how high the bar should be. The minimal proposed definition does not adequately address these issues and has potential to disadvantage newer universities and developing researchers.

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Option 2: If RQF submissions were required to include all ‘research active staff’, then Australian universities would need to go through the process of developing national, comprehensive, agreed definitions of ‘research activity’, with all the buy-in by discipline bodies and universities that this would entail. Option 2 could also become a ‘perverse’ incentive for universities to implement practices that maximise potential RQF outcomes by curtailing the research involvement of some ‘teaching and research’ staff. Including all staff at a university would increase implementation costs significantly, potentially diverting resources from Australia’s overall research effort during the process. Additionally, Early Career Researchers could be disadvantaged by being included before their research has matured. These difficulties also apply to Option 1.

Option 3: RFCD codes should not be used as ‘organising principles’. They are appropriately used for reporting purposes, notwithstanding that many leading researchers involved in cutting-edge work find these codes highly restrictive even as descriptors of their fields of research. This option also allows the RFDC codes to drive behaviour and could lead to researchers retreating to a narrow discipline focus for Tier 1 and 2 groupings (as evidenced in the ATN-Murdoch RQF Trial).

1.2 Size of research grouping

Under the EAG Final Advice, Universities would be making strategic decisions that balanced the priorities of gaining very high (5) quality ratings against the FTE involved. The funding model would be critical in determining how these decisions were made. Specifically, the details of the anticipated non-linear scale of funding for quality would be balanced against the anticipated multiplier for FTE.

In this scenario, the impact of the RQF on Australian research would depend on the funding model, but universities have accepted the more strategic environment, and the associated risks, that this implies.

The proposed Guiding Principle to impose a minimum size of 10 members, and maximum of 50, to the research groupings is not accepted by the ATN and we do not agree that it will lead to ‘better assessments’ by expert peer panels because:

- the range from 10-50 is too large for these groupings to be deemed comparable;
- many significant and leading research groupings comprise fewer than 10 members in the university research sector, which may differ from the experience of publicly-funded research agencies which are heavily represented on the DAG;
- there are significant discipline-based differences in the constitution of research grouping; and
- expert peer assessment panels are able to make judgments in relation to research groupings of different sizes.

The ATN is supportive of public policy drivers that encourage research groupings to achieve scale and ‘critical mass’, noting that research into optimum group size tends to reinforce relatively smaller groupings. We note also that it is difficult to retain the anonymity of individual researchers if groupings are very small. Additionally, we accept that the assessment of large numbers of micro-groupings could be very costly.

If, for these reasons, the RQF were to set a minimum group size, we would propose that this be set at 5 FTE of staff currently employed on at least 0.4 FTE appointments. It is also the case that it could become progressively more difficult to assess quality and impact fairly for research groupings exceeding 20-25 researchers.

Restricting the size to avoid very small or very large groupings could be practical, noting that, if the Universities are required to make a choice, those choices must be made in the full knowledge of the funding model which will be used to distribute funds following the assessment.

1.3 Use of RFCD codes and assessing cross-disciplinary research groupings

The EAG Final Advice made provision for research groupings to indicate up to three 4-digit RFCD codes. The Expert Panels were formed, on the advice of a working party, by drawing on the experience of researchers and administrators with ARC and NHMRC assessment by expert peer panels. These panels, which have supported peer assessment of, and by, Australian researchers over many years, are mapped against RFCD codes. The ATN is supportive of the use of the 12 panels proposed by the EAG.

It is unclear from the Guiding Principles that the DAG intends that groupings will be able to nominate up to three RFCD codes, but this would be the Universities’ expectation of the mechanism for groupings to nominate cross-disciplinary research themes. If the DAG does not intend that research groupings may nominate up to 3 RFCD codes, it will need to explain how inter- and cross-disciplinary research groupings may be identified as such and appropriately assessed.

At this point the Guiding Principles document is silent on the process to be used to assess research groupings where their research themes will involve cross-panel assessment. This is emerging as a significant concern for many researchers. If it is not addressed soon, we will see some researchers withdrawing from innovative cross-disciplinary research groupings because of their concerns about RQF assessment. Clearly this would be to the detriment of the Australian research endeavour.

2. Research quality

It is proposed that the peer review assessment process may be supplemented to include the use of quantitative measures. There are specific issues raised for each of the proposed ‘quantitative measure’.

Citations per publication: If citation data are to be used it is important that these data are referenced relative to the global research field and year of publication- numbers of citations per paper alone are not an appropriate metric. If measures of citations per publication relative to the research field are used, it is then not necessary to identify proportions of publications with citations in the top 10%. If proportions of publications in the top rank are to be included, then it would be useful to provide a graded scale i.e. the proportion of publications with citations which places them in the top 10%, top 25% and top 50% of the field.

It is critical that such metrics are not used in those discipline groupings where they do not provide a measure of research quality and that clear mechanisms be articulated for seeking inputs as to what will constitute evidence based benchmarks for these disciplines and that these benchmarks are established and accepted before the end of 2006.

Research income: The statements in relation to the role of research income from different sources are confusing in the Guidelines. For example, how will the income be calculated – pro-rata or by group? Will a grant with researchers in different groups be able to claim the same grant for each group and how will this be verified? Given that there are a range of research funding agencies which support quality research, a clear statement of research funds earned from each of the research income categories 1-4 for each research grouping, would provide the most complete overview of the groups research funding. Again, this acknowledges diversity in research funding which supports high quality research outputs.

Peer Esteem measures: These form an important and verifiable component of the quality of research groupings. In the first iteration of the RQF, it would be important to allow research groupings to provide an inclusive list of the measures, rather than attempt to constrain the list of measures in the first instance.

3. Research impact

We strongly support and commend the DAG's Guiding Principles on impact and make the following points:

Impact rating: It is not clear how a rating of D can be arrived at, when the research outputs during the period prior to the assessment period will not be included as part of the evidence portfolio. It is highly likely, therefore that most research groups will simply argue that the research is at too early a stage to have resulted in any impact.

If impact is considered to be an important component of the Australian RQF then it would be *critical* for the RQF DAG to indicate for which research areas (as summarised by 4 digit RFCD codes) the condition applies that '*due to its intrinsic nature, it is not expected to result in straightforward end user benefits*'. The areas in which this might be an acceptable statement should be identified before the end of 2006.

It is not stated in the Guiding Principles that end users or external assessment will be used for impact assessment and it would be important to emphasise the importance of the role of the end user representatives on the assessment panels.

The inclusion of 'beneficial engagement' as a rating category results in knowledge transfer activities/ engagement with non academic partners being included in the RQF and to disallow the development of a separate funding stream to support knowledge transfer activities outside the RQF.

It is clear that further work will be required on the development of 'verifiable impact indicators' by the RQF Impact Working Group.

4. Attribution

We accept the Principle that research outputs produced prior to the 6-year assessment period may be cited in describing impacts occurring within the 6-year period; and we accept the caveats.

However, we are concerned about the potentially de-stabilising recruiting activities (i.e. poaching) that could result from the Principle that a researcher's total impacts and outputs, over the preceding 6 years, be attributed to the institution employing the researcher on the 'census date'.

One solution could be to include only those outputs and impacts achieved while the researcher was employed at the institution, and attribute them to the employing institution. It is recognised however that this may provide some difficulty for the assessing panels in considering the relative merits of research groupings.

5. Information Technology

We are extremely concerned that key IT development is not yet sufficiently advanced or resourced to support the RQF implementation in 2008. Key elements that universities need to be working on now include submission requirements and data specification, collection and validation. We believe that it will be difficult to achieve the necessary IT developments and required pre-testing for implementation within the anticipated timeframe of a 2008 start.

The focus of effort on repositories is in advance of understanding what the expert assessment panels will actually require. (For example, what proportion of all nominated outputs will the Panels actually read? how will panel members decide which outputs they need to read?) Extending the IT development to capture the requirements of the Accessibility Framework may be over-ambitious, given the urgent and pressing RQF IT challenges.

We would suggest that the IT Working Group will need strengthening to include not only those expert in data collection (i.e. librarians), but also those expert in understanding the context in which the data is generated, collated and analysed (i.e. Research Directors).

It is clearly recognised that there will be a requirement to build greater functionality and sophistication into the RQF IMS after the first RQF exercise. Given the implicit recognition that the first RQF exercise will be a 'learning' exercise, it would be important to support the principle that either an 'optional' or compulsory RQF exercise might run within a 3 year, rather than the foreshadowed 6 year time window. This would allow issues or areas which were poorly handled during the first exercise to be addressed without incurring long standing disadvantage to specific discipline areas or institutions.