



Queensland University of Technology

Response to the TEQSA consultation regarding the draft text for the proposed legislative instrument on the matters to which TEQSA must have regard when assessing quality of research in the Australian University category

Queensland University of Technology (QUT) welcomes the opportunity to comment on the draft text constituting the proposed legislative instrument on the matters to which TEQSA must have regard when assessing quality of research in the Australian University category.

The draft text aims to set out matters which are relevant to an assessment of research quality. To further improve the extent to which the draft text might achieve that objective, QUT recommends the following amendments be made to the proposed legislative instrument (inserted text in **red bold**, omitted text in ~~green bold strikethrough~~):

Draft text for the proposed legislative instrument

- a. the volume of citations, and the quality of the publications in which those citations occurred, for peer-reviewed journal papers, **and reliable determinants of research quality for other forms of research dissemination (such as books, book chapters, conference proceedings and non-traditional research outputs), assessed relative to disciplinary norms;**
- 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, **and, where peer review has not occurred (especially with regard to open access data and publications, and book publication), the nature and results of other reliable quality-control measures;**
- c. results from Excellence in Research for Australia or any comparable evaluation in Australia, and from comparable national and international research assessment exercises;
- d. the regulated entity's governance framework for research including:
 - i. its policy framework for research;
 - ii. its financial support for the pursuit of research; and
 - iii. 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:
 - i. the number of researchers at the regulated entity;
 - ii. the relationship between individual researchers and the regulated entity;
 - iii. ~~whether all~~ **the proportion of** researchers ~~are~~ engaged in the research community at the regulated entity;
 - iv. **the proportion of time afforded active researchers to conduct research at the regulated entity;**
 - v. the extent to which research at the regulated entity is current or recent; and
 - vi. the supervisory and study environment for research activity at the regulated entity; **and**
- f. the success of the regulated entity in competitive research grant rounds and other direct funding for research, **disaggregated by HERDC research category, including assessment of outputs relative to funding; and**
- g. **the success of the regulated entity in research translation as expressed through disclosures, patents and commercialisation income.**

These suggested amendments address the following concerns regarding the considerations as currently drafted:

- the potential disadvantage to HASS disciplines relative to STEM, and certain discipline clusters within HASS and STEM relative to other cognate fields, due to different publication and citation practices;
- certain outputs besides peer-reviewed journal outputs also add value and demonstrate quality, especially books and book chapter in HASS, conference proceedings in engineering, and non-traditional research outputs in the creative arts;
- the draft text takes insufficient account of the transition to open access research publications and the shift toward pay-to-publish arrangements, which may skew the research that is accepted for publication, impacting on quality;
- the draft text takes insufficient account of the value and increasing utilisation of open access publication of research data;
- absolute measures of both research FTE and grant funding bestow a scale advantage that is not relevant to the exercise (other than above a certain base threshold, perhaps);
- absolute measures of total research FTE are less illustrative of institutional commitment to research than the proportion of the academic workforce engaged in research and the proportion of research-active workforce time devoted to research;
- absolute grant success is less illustrative of productivity and effectiveness than assessment relative to quality outcomes and opportunity;
- assessment of undifferentiated research income risks the packaging of consultancy as commercial research, which the explicit use of HERDC specifications (especially category 1) mitigates; and
- the increasing importance of research commercialisation as an inherent indicator of effectiveness of university research.

We would be pleased to discuss these suggested amendments and concerns further. Should you wish to do so, in the first instance please contact:

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