



Summary of external consultation on Guidance Note: Research Requirements for Australian Universities

In September 2022, TEQSA received feedback from several providers and peak groups, including:

- Australian Catholic University
- Australian Research Data Commons (ARDC)
- Avondale University
- Bond University
- Charles Sturt University
- Edith Cowan University
- Group of 8 (Go8)
- Independent Higher Education Australia (IHEA)
- James Cook University
- Queensland University of Technology
- Regional University Network
- RMIT
- Uni Southern QLD
- Universities Australia
- University of Divinity, Australian College of Theology, and Sydney College of Divinity
- University of Notre Dame
- University of the Sunshine Coast



- Victoria University
- Western Sydney University

Summary of the feedback

Feedback Received	Action Taken	Rationale
Supportive		
Supports the inclusion of a list of identified issues.	No change.	
Supports approach of providers needing to have a systemic approach to self-assurance for research quality.	No change.	
Supports the flexibility in approach included in the guidance note.	No change.	
Constructive		
Add additional sections of the Threshold Standards to the guidance note	Additional sections of the Threshold Standards were added where relevant.	Including the key sections of the Threshold Standards gives the reader a better understanding of obligations regarding research requirements for Australian Universities.
Conflicting feedback about mapping fields of Education to Fields of Research and	Changed the concordance table to map Fields of Education (ASCED 2001) to	Helps the reader better understand how a provider may demonstrate compliance when



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<p>whether this should be done at the 2-digit or 4-digit level.</p> <p>Some fields of research were not captured by the ANZSRC 2008.</p>	<p>Fields of Research (ANZSRC 2020) at the two-digit level.</p> <p>Provided an explanation on how providers may present evidence of research quality in Field of Research they have mapped to Fields of Education, to demonstrate compliance with the standards.</p>	<p>considering Fields of Research against Fields of Education.</p>
<p>ARC is positioned as a type of regulator in the guidance note</p>	<p>Have adjusted language to make clear that TEQSA will give appropriate weight to the ARC's judgments on the quality of research, but will also take into consideration other evidence, where appropriate.</p>	<p>Whilst the ARC's judgements on national quality assessments are important evidence for TEQSA to consider, they are not the only evidence that may be considered regarding compliance with the research requirements.</p>
<p>Adjust language about ERA given it is under review.</p>	<p>Adjusted language when referring to ERA such as 'national assessments', and 'ERA (or alternatives)'</p>	<p>ERA is under review and its title and application may be change however a national assessment of research quality will continue to exist and be key to TEQSA's consideration.</p>
<p>Delay guidance note until review of the ARC is completed.</p>	<p>No changes.</p>	<p>Compliance with the Threshold Standards will still be required even whilst the ARC is under review. After the ARC review is complete, updates may be made to the guidance note where appropriate.</p>
<p>Guidance note may need to be reviewed post-ARC review.</p>	<p>No changes for now.</p>	<p>Will review guidance note after the review of the ARC has been completed.</p>



Feedback Received	Action Taken	Rationale
Sought clarity on what 'overreliance' on certain projects, sub-fields, or researchers means	Added more information about the need for providers to have contingency plans where there is heavy reliance on a single project, sub-field, or researcher to meet research requirements.	Recognises that providers will rely on particular staff or pieces of work to support them in meeting research requirements, whilst making clear that providers need to plan for what they will do to manage these potential risks.
Sought greater clarity on how World Standard will be determined	Provided more information about what TEQSA will consider when determining whether World Standard has been met.	Provides greater understanding for the reader about consideration relevant to having research quality at 'World Standard'.
Sought more information about what "insufficient investment or resources necessary to maintain research quality..." means.	No changes.	Whether investment or resources are 'sufficient' will be in the context of the type and amount of research being done. Under-investment in research may impact research quality and increase the risk of non-compliance with the HES Framework.
Use of 'novel' quality assessments should not be an identified issue, because nationally developed standards may be novel.	Adjusted language about the identified issue to explain it would be an issue for a provider to rely on quality assessments that are singular or unique and are not benchmarked internationally or nationally.	Clarifies what would and would not likely be an issue for a provider in meeting research requirements.



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Sought clarity on “lack of external scrutiny or peer review of research quality”.	No changes.	This is a broad statement that is intended to capture lack of appropriate independent scrutiny of research quality. This guidance note is not intended to specifically cover in detail all forms that a potential issue may take.
Sought clarity on what "calibration to a provider's maturity and risk profile" means.	No changes.	TEQSA's risk assessment framework already provides information about how TEQSA uses information about risk to inform its regulatory activities.
Sought more information about what happens if an Australian University does not meet the research requirements.	Included information about TEQSA's approach to these instances.	Provides clarity about how TEQSA will approach instances should a provider no longer meet the research quality requirements associated with their category of provider.
Include information about research outputs coming in different forms	Including in the guidance note that TEQSA will consider research outputs against nationally agreed definitions of research, and nationally agreed research quality assessment methodologies.	Makes it clear that TEQSA will consider research outputs in line with changing, but nationally agreed standards.
More information should be provided about the use of data and digital infrastructure regarding research.	No changes.	Focus of this note is to provide guidance on how a provider may meet research requirements and is not intended to go into this granular level of detail.