



Australian Council of Graduate Research (ACGR) Response to Department of Education Consultation Paper on Research Block Grants

Sharper incentives for engagement: New research block grant arrangements for universities

Introductory Comments

The ACGR is concerned on several grounds with the government's introduction of the concept of fee offsets to describe the funding available within the RTP to support the costs of delivery of research training to domestic candidates. Our concerns include the degree to which this departs from the terminology and operation of the RTS which relate funding to program delivery for domestic candidates. ACGR notes that the 2011 Deloitte Report Examining the Full Cost of Research Training found that on average universities are funding 27% of the full costs of research training per domestic EFTSL from sources other than RTS block grants. We therefore propose that it is recognised that the Research Training Program will support stipends for candidates and partially contribute to the costs of establishment of an appropriate environment and supervisory support for HDR candidates with additional support for program delivery and indeed additional scholarship support coming from institutional investments.

1 Does RSP funding require limits on allowable expenditure? If so, would the proposed restrictions allow sufficient flexibility to support HEPs research activities?

This question is more appropriately responded to by other stakeholders however we do note that the table on page 10 excludes support for HDR students in the Exclusions under the proposed arrangements. We suggest this be changed to **stipend** support for HDR candidates. Separating project, support staff or infrastructure support for HDRs from other members of a research group is inappropriate and often impossible.

2 What information could HEPs provide to best demonstrate value for money and performance under the RSP?

This question is more appropriately responded to by other stakeholders.



3 Should a cap be imposed on international enrolments or should enrolments be unrestricted and monitored over time?

ACGR notes that the Review of Research Policy and Funding Arrangements specifically concluded:

“...that the combined funding scheme should offer both stipends and tuition fee scholarships to the best applicants *...regardless of nationality.*”

ACGR membership is concerned that, in some disciplines and/or universities, limiting support for international candidates to 10% of the total pool will result in higher quality international candidates missing out on scholarships at the expense of lower quality domestic applicants. This recommendation is also not clear about whether it is intended to include fee offsets (or research training environment contribution – as noted in our introductory comments).

Whilst ACGR appreciates the Commonwealth’s concerns about disproportionate investment in international candidates, we consider that the additional expense of supporting international candidates (tuition fee scholarship and stipend) provides sufficient restriction on the capacities of institutions to make these awards while allowing HEPs to make the number of awards to international candidates they see fit especially in key strategic areas (STEM) in which demand from local applicants remains flat. Further to their crucial role in the STEM research effort, international research candidates are a significant proportion of the international student population thus adding significant value to the Australian economy, as documented by the report Deloitte Access Economics on the economic value of international education to the Australian economy (2016).

The ACGR recommendation is that the number of awards made to international candidates is unrestricted and monitored over time rather than prescribing a maximum proportion of the total funding that can be expended on international students.

4 Which key dimensions of RTP support (such as the type of students, total amount of support and stipend levels) would reporting need to include to ensure the program is meeting its policy goals and no undesirable consequences are occurring?

ACGR agrees that the number and type (domestic/overseas, Masters by Research/PhD, full time/part time) of students receiving RTP support, and how this funding is expended (i.e. total amount expended on the research training environment/support and the total expended on stipends) are appropriate reportable metrics to determine if the RTP is meeting its stated objective to provide flexible funding arrangements to support the training of domestic and international research students. The Commonwealth may also consider reporting on funding support by Field of Education/Field of Research.



5 Are the proposed RTP eligibility criteria an improvement on current arrangements? Are there likely to be any unintended consequences?

ACGR appreciates the need to align the eligibility criteria for RTP Fees Offset and RTP Stipends and notes the recommendation to remove eligibility criteria related to minimum qualifications and prior HDR study. The Council supports the proposal to retain the requirement for competitive merit based selection according to criteria defined by each institution.

However ACGR is surprised by the proposed removal of the eligibility criterion requiring RTP recipients to hold at least a four-year qualification (or equivalent). The Council believes that this requirement for admission to undertake a higher degree by research should be retained along with the current equivalency provisions, which have been adopted by most HEPs and effectively provide pathways for applicants with non-traditional educational backgrounds, including applicants from industry and professions.

ACGR is also surprised to see that it is proposed that funding may also be secured for candidates to undertake a second PhD. In the view of the Council, this is not a good use of scarce research training funding. The only circumstances in which ACGR would consider this proposal being applicable would be in cases where an applicant holds a coursework doctorate and seeks to undertake the PhD for research training.

6 Is the proposed approach to defining RTP benefits a better approach to meeting the goals of the program? Are there likely to be any unintended consequences?

ACGR supports the proposal to set a base rate of stipend at the current APA rate and agrees with the requirement for CPI based annual increments to be embedded in the guidelines but sees no value in ascribing a maximum value for stipends. Currently universities variously top up scholarships to attract domestic candidates, in particular this is deemed necessary in market-sensitive fields such as engineering. This has not resulted in universities using disproportionate levels of funding to increase stipend values at the expense of total number of scholarships.

ACGR does not support the restriction of higher value scholarships to those candidates with formal industry placement elements, although HEPs should be free to load industry-engaged scholarships if they see fit. As stated above, higher than normal stipend rates are required to attract top quality candidates in particular disciplines and institutions need flexibility to attract desirable candidates to priority areas.

ACGR notes that there is no particular reference in this paper to the PhD Placement Scheme that was recommended in the Watt Review Report. While the ACGR fully supports increased industry engagement in HDR training, the primary barriers to developing industry placements do not lie in the stipend level provided to students. The ACOLA Review did not find that higher value scholarships would increase industry placement opportunities. Instead the Review found that the lack of flexibility in scholarship guidelines, the focus on



timely completions, lack of incentives for universities to develop placement programs, lack of financial and coordination support for business, as well as a lack of collaboration opportunities were the main inhibitors. ACGR would prefer to see action taken in these areas.

7 Will the flexibility to set maximum stipend rates result in competition across the sector and mean that most students will receive the maximum level of RTP support and cause a substantial reduction in HDR student numbers? If this is a likely risk what constraints should be built into the new arrangements?

Ongoing funding incentives through RBGs to increase completions are strongly commended by ACGR and will continue to moderate institutional behaviours that drive HEPs setting of stipend rates thus keeping excessive payments in check. As stated in the previous section, universities currently top up scholarships but this has not resulted in institutions using all their available institutional funds to increase stipend values nor significantly decreased the total number of scholarships that are offered.

ACGR believes that a bigger risk to the quantity of scholarships on offer is the capacity for institutions to invest excessively in Fee Offsets rather than Stipends. We therefore propose that the new guidelines require that, at least during 2017, the number of scholarships supported by federal funds do not decrease by more than 10% from 2016 level.

Whilst it is outside of the remit of these guidelines, ACGR considers that every effort should be made to make the pursuit of an HDR, especially the PhD, attractive to domestic candidates. We note in this context that any move to impose tuition fees on domestic candidates or levy a student contribution to their tuition will likely provide a further disincentive for Australian candidates to pursue research training.

8 Is the proposed length of RTP support a better approach to meeting the goals of the program? Are there likely to be any unintended consequences?

ACGR supports institutional flexibility in determining the length of RTP candidature noting that the AQF stipulates that the PhD and other level 10 awards are courses of study of 3-4 years duration and Masters courses up to 2 years.

It is not logical to allow for extensions of time on the basis of satisfactory progress. By definition candidates progressing well will not require extensions. ACGR considers that the proposal to allow for formal extensions beyond the pre-defined length of candidature will undo the very good progress made across the sector to bring completion times for the PhD to four years and less. Arrangements for extensions to both candidature and scholarships should be only available for extenuating circumstances.

ACGR therefore recommends that institutions are able to set the duration of support for each degree within their institution with maximum duration for the Masters being two years and the doctorate four FTE. Thus, as is currently the case in many HEPs, the PhD is



described as a degree of 3-4 years duration, with optimal completion being 3.5 years and maximum duration 4. In the view of ACGR, allowing scholarships to run over 4 years represents a greater risk to the efficiency of research training in Australia, which is a key competitive advantage in the global market, than the risk of excessive scholarship top up payments.

9 Is the proposed approach a better approach to meeting the goals of the program? Are there likely to be any unintended consequences?

This approach provides the flexibility that ACGR has requested. The Council agrees that competitive allocation of stipends to domestic and international candidates and fee offsets to international students on the basis of academic merit should continue and that the means by which domestic tuition fee support is allocated should also be clearly defined.

The Council is strongly supportive of the proposal that universities have the capacity to take institutional priorities and research strategy into account when selecting candidates and scholarship recipients on the condition that any considerations over and above the merit of the candidate are openly communicated to all applicants. In our view, this provides a sound mechanism for ensuring that the best applicants are directed to the most vibrant and productive research areas in the institution.

10 Would the proposed provide clarity to students regarding RTP processes and entitlements? Are there likely to be any unintended consequences?

In order to ensure equity and consistency on core scholarship entitlements, ACGR believes that sector wide minimum conditions for federally-funded scholarships should be maintained. These should cover annual, sick and family/parental leave and could be based on those elements of the existing APA guidelines.

11 Are the proposed transition arrangements sufficient for continuing students? Are there likely to be any unintended consequences?

ACGR would like to see greater clarity regarding the intention of the 'no disadvantage' conditions for continuing HDR students. It seems reasonable to ensure that existing students should receive the same benefits that they receive under their current program. However, the idea that awarding enhanced benefits to such students be discretionary is a potential problem and we can imagine that such existing students may well ask for 'enhanced benefits' (such as a 4 years program) if this is offered to new RTP students. It would be helpful to make it clear that commitments under current arrangements will be honoured but HEPs should be able to develop new programs with altered benefits and **conditions** for new students that are not accessible to students in the former program. The problem with the current wording is that 'discretionary' may be challenged as being arbitrary. It is considered necessary for the Commonwealth to bring clarity to this issue or HEPs risk facing appeals and grievance actions from current candidates.



12 Would the proposed arrangements help the monitoring and benchmarking of student outcomes? Should the department consider collecting any other types of HDR student data such as level of support provided and a stipend amounts for individual students?

With respect to candidature outcomes, ACGR supports the need to measure and monitor how the RTP funding is used and what outcomes are achieved but warns against prematurely introducing any new metrics without adequate consultation, exact definitions and assurance that institutions can monitor and accurately and consistently report on these metrics.

Specifically, any measures of completion rates/times are dependent upon very carefully articulated commencement dates, consumed candidature calculations, completion dates and the treatment of periods of enrolment and leave, including any time beyond the allowable period of RTP support which are applied consistently across the sector. A sector wide agreement on an appropriate measure of completion rate underpinned by data that is consistently accessible via the variety of student management systems used across the sector is needed before this metric could be used to assess the performance of individual universities.

Publications by HDR candidates should also be reported as a measure of preparation for academic careers and contributions to knowledge. With respect to the research productivity of candidates within and immediately beyond candidature, which is an important measure of both the quality of research undertaken and research training provided, it has not been helpful that HDR outcomes have been included within the soon to be phased out HERDC collection, but excluded from ERA. ACGR strongly recommends that with the phasing out of the HERDC audit of research outputs, the Commonwealth moves to include HDR outputs in ERA. This will provide a more comprehensive picture of research outputs and provide incentives for HEPs to develop processes for the systematic reporting of HDR research outputs, especially non-traditional outputs.

In relation to the post-graduation outcomes of candidates, ACGR also notes that medium to longer term tracking of graduate outcomes is a significant gap in current national level reporting. ACGR notes that a great deal of data already exist – ABS, taxation records, profiles of individual graduates and their careers on social and professional networking sites – and urges the Commonwealth to support the development of an integrated framework for researcher access to these data.

In relation to industry engagement, an agreed national definition of “industry” is also needed and ACGR supports the inclusive definition of industry put forward by the ACOLA panel in preference to more narrow definitions of industry being promoted by other agencies. In the Review of the Research Training System, industry collaboration is taken to mean collaboration between a university and any potential end-users of research, including but not limited to businesses, governments, government business enterprises, non-government organisations, not-for-profit groups and community organisations.



Further, the concept of industry engagement should be significantly expanded to encompass more than the numbers of candidates undertaking industry placements and internships. Industry engagement takes place along a continuum which includes a variety of engagements from industry identified and supported research projects to industry collaboration in broader projects and workplace internships not necessarily aligned to the research project. Depending on the breadth of acceptable types of “industry engagement”, significant time and planning will be required to enable institutions to develop processes to collect this data.

An initial and interim source of metrics may be the expansion of the QILT instrument to survey current HDR candidates – including demographic questions which ask whether respondents have engaged in various types of industry engagement experiences. Until and unless the QILT instrument can be expanded appropriately to address the HDR experience, the PREQ should continue to run possibly with the addition of several additional fields to capture industry engagement, as just one example.

13 Would the proposed changes to Categories 2, 3 and 4 result in more appropriate and reliable measures of research engagement? Should the department consider collecting any other types of engagement data?

This question is more appropriately responded to by other stakeholders.

Additional Comment on Draft Commonwealth Scholarship Guidelines 2017

Section 1.5.5

The ACGR welcomes the increased weightings for indigenous students and would also recommend a future review of the Fields of Education that attract high and low cost completion funding.

Section 1.15.5 Expenditure of RTP Grant Amounts

Section (1) c) is too restrictive and should include a broader range of skills training and industry engagement

References

Deloitte Access Economics. 2011. Examining the Full Cost of Research Training. Accessed at: <http://www.industry.gov.au/research/ResearchWorkforceIssues/Documents/FullCostofResearchTraining.pdf>

Deloitte Access Economics. 2016. The value of international education to Australia. Accessed at: <https://internationaleducation.gov.au/research/research-papers/Documents/ValueInternationalEd.pdf>