

# ACGR SUBMISSION TEQSA GUIDANCE NOTE: RESEARCH AND RESEARCH TRAINING CONSULTATION

# 4 July 2022

The Australian Council of Graduate Research (ACGR) welcomes the opportunity to provide feedback to TEQSA on the revised Guidance Note: Research and Research Training.

ACGR was established in 1995 and is Australia's peak body for graduate research education. Our purpose is to promote and support excellence in graduate research education through establishing best practice standards, providing a forum for networking and practice sharing amongst graduate research leaders, influencing the development of graduate research policy and promoting the benefits of graduate research. ACGR has developed a set of Good Practice Principles for Graduate Research, along with a suite of accompanying Good Practice Guidelines.

Every Australian university, and several other higher education providers who are accredited to deliver higher degrees by research, is a member of ACGR and is represented by a senior academic leader, typically Dean or Pro Vice-Chancellor of Graduate Research. ACGR has consulted with its members regarding the revised Guidance Note and is pleased to provide the following response for consideration by TEQSA.

## **General Comments**

ACGR commends TEQSA for the review of the Guidance Notes, supports the notion of simpler advice which aligns with specific sections of the HESF 2021 and acknowledges the aim to align this revised guideline with the template created for all in the suite.

# Section 1

ACGR endorses the definition of research training for the purposes of this document as a formal course of graduate study that leads to the acquisition of advanced skills, techniques and knowledge in the conduct of research and recommends that the stand-alone honours degrees with a substantial research component should also be expected to address the issues articulated in this guidance note.

We note that the first paragraph of the draft note refers to the HESF 2015 but the legislation that is currently in force is the <u>HESF 2021</u> so this reference may need to be updated.

We also believe that it is important to highlight the other critical elements of research training in the definition provided. We note that a research output is required for HDR, i.e., thesis and that in version 1.0 it makes it clear that "While HDR may contain some coursework subjects designed to



build skills and knowledge in research methods, research should constitute at least two thirds of the course if they are to be classified as HDR."

#### Section 2

ACGR suggests that the TEQSA expectation of well-developed and mature, course design, review and quality assurance processes should be extended to include research supervision.

ACGR welcomes the inclusion of the table in Section 2 which links key considerations to components of the HESF relevant to research and research training and recommends the following amendments:

- that, for the sake of completeness, other elements of the HESF that relate to research training should be included in Part A of the table ie 1.3.3. (monitoring progress), and 7.3.1j (arrangements with other parties)
- that the considerations relating to Section 5.2: Academic and Research Integrity and Section 5.4: Delivery with Other Parties specifically reference industry partners, placements and internships which are such a key component of contemporary research training in Australia.
- that 5.2 Academic and Research Integrity also includes "training" alongside "guidance" given one of the common issues listed in section 3 is related to breaches of the Code.
- that the supervisor research active considerations listed against Section B1.1.2 cross reference those in Section 4.2 of the HESF which utilise the terminology "active in research" rather than research active and makes it clear that the principal supervisor must be active in research and an associate supervisor be appointed with relevant research experience. It would be useful to note in the guidance materials that research activity is not mandatory for any industry or other practitioner supervisors who are part of a team.

### Section 3

Through the development and promulgation of its Good Practice Principles and Guidelines, and national conference and webinar program, ACGR collaborates with and supports institutions as they develop policies and procedures to assure the quality and integrity of their research training programs.

Whilst it is agreed that the risk factors identified in this section should be avoided by all universities, ACGR is concerned that the section heading implies that these problems are currently widespread across all universities. Given that this is not the case, ACGR suggests that *Identified Risks* may be a more appropriate title for Section 3.

Within this list is it also suggested that:



- distinction is made between the risks involved in the poor choice of (inappropriate or inexperienced) examiners and the inadequate quality assurance and review of the thesis before approval for dispatching for examination
- the implications of frequent changing of supervisor supervisory arrangement encompass lack of qualifications and experience in the field as well as lack of interest
- the risks associated with international regulatory compliance including Foreign Interference and the new amendments to Migration Act also be included
- the 10<sup>th</sup> dot point which addresses lack of risk mitigation for poor supervision would be more impactful if linked to or following the points made about inadequate supervision within the same section. Alternatively, in terms of fluency, this statement about risk mitigation might read better as a positive (as it is in the current note) rather than a negative statement, included as a separate paragraph at the end of the dot point list.

# Reference Points

ACGR is disappointed that the new Guidance Note no longer lists the <u>ACGR Good Practice Principles</u> for Graduate Research as an External Reference Point. These principles articulate a set of standards considered to be essential for the delivery of graduate research programs and has been commended both nationally and internationally as a valuable quality assurance tool in research training delivery. We commend the TEQSA guidance note as very useful but contend that it stops short of identifying best practice and detailed recommendations. The ACGR Principles would fill this gap and lead to improved quality assurance and management.

We encourage TEQSA to continue to cross-reference this resource.

#### Other Guidance Notes

Finally, ACGR recognises the challenges associated with the development and delivery of joint and collaborative research training programs and acknowledges the advice provided in the current <u>Guidance Note: Joint and Dual Awards</u>.

Whilst this document does now need review and ACGR would be pleased to contribute to the same, we do encourage TEQSA to maintain this particular guidance note and consider its review in alignment with this current revision/renewal process.

For further information please contact

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