Australian Government

Department of Education, Science and Training

Research Quality Framework

RESPONSE TO THE ISSUES PAPER

RQF010053

A RESEARCH QUALITY FRAMEWORK (RQF)

Response to the RQF Issues Paper - Submission Cover Page

Submission Number	**RQF010053**

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RESEARCH QUALITY FRAMEWORK (RQF)
Response to the Issues Paper

Preliminary comment

The Australian Association for Research in Education (AARE) has over 1300 members from all parts of Australia and many overseas countries. The majority of members are university academics, but there are also school and VET teachers; officers of teacher organisations, school authorities and education departments; and other educational researchers and users of educational research. AARE has an active postgraduate and early career researcher membership. Thus the positions taken in this Response to the Issues Paper reflect the views and expertise of this diverse membership.

Additional comments at the end of this submission discuss purposes and outcomes of any implementation of a RQF in some detail, and make a brief comment on criteria for assessing research for professional practice.

Part 2: Creating an Australian RQF

2.1 Structuring an RQF

Issue 1: How should an RQF be applied to universities and publicly funded research agencies?

(a) An RQF should be applied in the same way to both universities and publicly funded research agencies.

☐	Strongly agree	☐	Strongly disagree	X	No comment
☐	Somewhat agree	☐	Somewhat disagree		

(b) Within the university sector, an RQF should be applied differentially to specific types of institutions.

☐	Strongly agree	☐	Strongly disagree	☐	No comment
☐	Somewhat agree	X	Somewhat disagree		

Additional comments

(a) We make 'no comment' because the non-university institutions ('publicly funded research agencies – PFRAs) to be involved in this exercise (CSIRO, ANSTO and AIMS) carry out little, if any, educational research. If other agencies (such as NCVER) were to be involved, the general principles set out in the following comments apply.

(b)

AARE is firmly of the view that the very different natures of research between (and within) different disciplines/fields need to be fully accounted for in any RQF and its implementation. This includes an appreciation of the nature and context of research for professional practice, as well an appreciation of the different natures and contexts of research in physical sciences, in creative arts, in humanities, in social sciences, etc.

However, we understand this issue to be concerned with *institutions*, not different fields/disciplines.

Here it is very important that the negative consequences (and, often, inappropriateness) of any categorisation of particular universities as 'less research intensive' are recognised.

First, there may be very strong research teams or research faculties/disciplines within an overall less research active institution. It would be inequitable as well as inefficient if they were denied support or recognition solely because of their institutional location.

Education provides an example. Australian educational research has very high international standing – according to research by Phelan, Anderson & Bourke, over the period 1987-98

> Australia's share of international *publications* is greater in education than for any other major field in this country except for the earth sciences... Australia's share of international *citations* is greater for education than for all other major fields except for the earth sciences and the agricultural sciences. (DETYA 2000, p. 579 - emphasis in original).

Yet, a high proportion of education academic staff are located (and educational research occurs) in universities that would be considered 'less research intensive' - not sandstones, aspirant research universities, or ATNs, to use Simon Marginson's categories (Marginson 2005, Table 3, p. 9). According to DEST data for 2004, 33 per cent of education academic organisational unit (AOU) 'teaching & teaching and research' staff are in those institutions, but only 18 per cent of 'teaching & teaching and research' staff in all AOUs, and only 8 per cent of all 'research only' staff are in those institutions.

While it is unlikely that any RQF implementation will limit access to national competitive grants for researchers in such institutions, their access to infrastructural support (broadly defined), postgraduate student enrolments, public esteem, etc should also not be limited because of institutional location.

Second, the impact on particular professions or fields/disciplines or communities must be considered.

Through the accident of history the education of many beginning professionals in teaching and some other occupations (and the large part of education in some fields not related to a specific profession) occurs in new universities that may not be considered 'research intensive'. It may be damaging to Australian society, economy and culture (as well as being inequitable) if these professions and fields do not have the research support that is given to those professions and fields that, through parallel accidents of history, are associated with universities that would be classified as 'research intensive'. This is a very important principle if 'impact' as social benefit is to be taken seriously.

Research of most relevance to (and involving as collaborating participants) Indigenous Australians, rural and remote Australians and those in the more disadvantaged urban communities also tends to be disproportionately carried out in institutions that may be considered 'less research intensive'. It is important that the capacity and capability for this research is not constrained by categorisations of the institutions in which it may occur.

Third, given the relatively recent creation of a number of universities from former CAEs, and the dramatic generational change in academic staff that will be occurring in most of them over the coming decade (Hugo forthcoming), it is crucial that the current (past and near future) degree of research intensity does not limit the future and simply become a self-fulfilling prophecy - preventing highly capable and motivated new staff from doing the research they would otherwise do because their institution is not given the resources because it is classified as a 'less research intensive institution'.

This generational change is a very important issue for education in the university sector as a whole. According to DEST data, in 2004 60 per cent of staff in the education AOU were aged 50

or over, while only 45 per cent of all staff were aged 50 or over. Males are generally much older than females, as the following table indicates.

Table 1.1 Percentage of teaching and teaching and research staff aged 50 and over

	Males	Females	Total
Education AOU	70%	54%	60%
All AOUs	49%	38%	45%

Source: DEST custom tables.
FTE of all full time and fractional full time teaching and teaching and research academic staff.

In conclusion, it would be most unfortunate if an institution chose to be classified as 'less research intensive' simply to ovoid an onerous participation in a research quality assessment, and such a choice had damaging consequences for many of the institution's current and future staff and for the fields/professions/communities with which they are associated.

References

Department of Education, Training and Youth Affairs (DETYA) 2000, *The Impact of Educational Research,* Research Evaluation Programme, Higher Education Division, DETYA, Canberra.

Hugo, Graeme forthcoming, 'Demographic trends in Australia's academic workforce', *Journal of Higher Education Policy & Management*.

Marginson, Simon 2005, 'Universities: potentials created by the Nelson reforms', a paper presented at the *Sustaining Prosperity: New reform Opportunities for Australia* conference, The Melbourne Institute/*The Australian*, Melbourne, 1 April.

2.2 Defining and measuring research quality and impact

Issue 2: Research quality and impact should be assessed by appropriately constituted panels.

X	Strongly agree	☐	Strongly disagree	☐	No comment
☐	Somewhat agree	☐	Somewhat disagree		

Additional comments

A 'panel' implies the importance of (a) professional judgements based on expertise, and (b) the forming of assessments based on fair discussion and appropriate deliberative practices.

We strongly agree that RQF assessments are best made primarily by such judgements and deliberations. Guidance material such as protocols, suggested and required criteria, exemplars, and opportunities to consult externally, would assist deliberations. This will be important to ensure reasonable consistency between panels, efficiency in deliberations, and to assist panel members – because, whatever the panel membership, it will be impossible for the particular individuals to have the full range of relevant expertise. Assistance to panel members may be particularly important because of the major generational change that will occur in the university sector over the coming decade (see Hugo, reference above). In five or ten years the age/experience profile of potential panel members is likely to be much younger/lesser than it is today. The membership of panels over the past decade should not be assumed to indicate the sort of people who will be panel members in the future.

There is a place for metrics, but these should be taken as 'indicators' only, with their limitations and biases in relation to different disciplines/fields and types of research appreciated. The results of the application of metrics would be evidence that panel members would take account of in making judgements.

2.3 Measuring research quality and impact

Issue 3: **Assessment panel members should include the following (the categories are not necessarily mutually exclusive):**

(a) Experts reviewers able to assess impact in a discipline area/academic field.

X	Strongly agree	☐	Strongly disagree	☐	No comment
☐	Somewhat agree	☐	Somewhat disagree		

(b) Expert reviewers able to assess impact more widely.

X	Strongly agree	☐	Strongly disagree	☐	No comment
☐	Somewhat agree	☐	Somewhat disagree		

(c) International expert reviewers.

☐	Strongly agree	☐	Strongly disagree	☐	No comment
X	Somewhat agree	☐	Somewhat disagree		

Additional comments

We assume that 'quality' is intended to be included in 'impact'. Poor quality research can have a significant (and damaging) impact. Part of 'quality' is involved in understanding the context of the research and how findings may be interpreted and used, and presenting the research appropriately (see Yates 2004). However, it is also possible for high quality research to have a damaging impact if, for example, the findings are misapplied or unforseen circumstances intervene.

(a) For education (and other disciplines/fields associated with professional practice) it will be essential for reviewers to be expert in the relationships between research and professional practice. In education there is a very wide diversity of methodologies, topics, scales, styles, and media of dissemination associated with high quality and high impact research. Panel members should understand and appreciate this, though it cannot be assumed that members of a panel can have themselves adequate expertise in all aspects of research they are to assess. Thus the importance of supporting materials, guidelines, etc, and access to particular expertise if necessary.

(b) In professional fields it is important that impact on professional practice is assessed, which may be best done with involvement on panels by informed representatives of the relevant profession. A professional practitioner is a particular sort of 'user', and will bring different insights to those brought by other users such as school authority policy officers. Measuring impact (social benefits) is often very difficult, especially when that impact is mediated through the professional judgements of practitioners.

It is often not easy (or appropriate) to distinguish between researchers, research managers, and users of research, especially in professional fields. Panel members who have worked in all such roles (and possibly be currently doing so) may be particularly valuable panel members.

(We are not clear the meaning of the comments in the Issues Paper under Issue 2 regarding 'external endorsement' and 'verification'. External experts on panels who are able to 'assess impact more widely' should have the same opportunities for substantive input as other panel members.)

(c) Of course many Australians are international experts. We assume what is meant is an expert from overseas who is also an international expert. Our 'somewhat agree' position is informed by two somewhat conflicting understandings. On the one hand, overseas experts may have biases associated with the nature of their education systems (for example) which are not relevant or appropriate to Australian systems, while, on the other hand, an overseas expert can also bring a valuable fresh perspective.

References

Yates, Lyn 2004, *What does good education research look like? Situating a field and its practice*, Open University Press, Maidenhead, Berkshire, UK.

Issue 4:	**Assessment panels should be informed by metrics whose nature and relative influence may vary across different disciplines.**				
X	Strongly agree	☐	Strongly disagree	☐	No comment
☐	Somewhat agree	☐	Somewhat disagree		

Additional comments

It is appropriate that metrics *inform* (not prescribe to) assessment panels because the nature and relative influence of metrics may and should vary within as well as across disciplines. Some of the factors leading to such differences (where quality is comparable) include:

* historical differences in the range of journals available to publish in, and the inclusion of journals in standard bibliometrics.

* importance for impact of publication in different types of publications. For example, in some fields (or specific research topics) the optimal route for high impact on the wider society is through publication in the most prestigious international journal, while, for other fields/topics, the optimal route is through local journals accessible to and credible with professionals/policy officers in local authorities/enterprises. In education, where there is great diversity in the types of research, the optimal routes vary greatly.

* for metrics associated with receipt of grant funds, the nature and range of funding schemes available needs to be accounted for. For example, there are very few education-specific schemes on the Australian Competitive Grants Register (only NCVER and two DEST schools group literacy and numeracy programs), which contrasts with the many health-related Commonwealth and Non-Commonwealth schemes, and the many large schemes available for fields associated with primary production.

* as noted in the Issues Paper, there can be very different costs usually associated with otherwise equivalent research in different fields, and this may account for very substantial differences in the value of grants received by different researchers, disciplines, faculties or institutions

* metrics related to higher degree students and post-doctoral appointments must take account of the different career patterns and requirements common in different fields. In particular, fields associated with professional practice differ from those not associated with professional practice. For example, compared with all research higher degree students, education students are very significantly older (two thirds over 40, compared with only one third of all students over 40), around two thirds are part time (compared with around a third of all students) and around four times as many are external. They are usually senior professionals whose reasons for enrolling in research higher degree programs, and the value to them of formal completion, tend to differ from the majority of students. Thus completion times and rates should be treated cautiously as indicators of 'quality', though they may be valuable tools for diagnostic purposes.

* metrics, by their nature, tend to focus on definable research 'products', and much significant educational (and other) research impact occurs through diffusion that is initially localised and individual, with the original researchers' identity often lost, at least as formally associated with the research findings as they are incorporated into practice.

2.4 Measuring research impact

Issue 5 (a): An RQF should recognise research impact through the measurement of different outcomes for different types of research and disciplines.

X Strongly agree ☐ Strongly disagree ☐ No comment

☐ Somewhat agree ☐ Somewhat disagree

Issue 5 (b): An RQF should recognise the production and diffusion of technology and knowledge as elements of research impact.

X Strongly agree ☐ Strongly disagree ☐ No comment

☐ Somewhat agree ☐ Somewhat disagree

Issue 5 (c): Where appropriate, users and those commissioning research should contribute to the assessment process by providing an external perspective on research under consideration.

X Strongly agree ☐ Strongly disagree ☐ No comment

☐ Somewhat agree ☐ Somewhat disagree

Additional comments

(a) We strongly agree that the different outcomes of different types of research and disciplines should be appreciated. Measurement may not be easy. The final impact may be difficult to discern, may be confounded by many other factors, and may not occur for many years. It will be important to assess the intentions, design and dissemination/application strategies as a guide to likely impact in terms of both nature and degree.

There are three separate issues in support of our 'strong agreement', and an RQF and its implementation should take full account of each.

First, there is the impact of research activities on professional practice though initial and continuing professional education.

Here there are commonalities between all fields involved in the preparation and continuing professional education of professionals (teachers, nurses and other health and medical professionals, lawyers, social workers, etc). Highly effective professional practice (rather than highly effective technical practice) requires high level judgements that incorporate the professional's evidence-based approach to reflection on their own practice, and critical evaluations of the research findings of others (whether published in internationally recognised journals or reported informally by colleagues). To be capable of and inclined to make such judgements, a professional needs to be inducted into a **research culture**. This involves both the content of courses in initial and continuing professional education, and the day-to-day contact with active researchers. While not all initial and continuing professional education is currently such a part of a research culture, it is essential that any RQF and its implementation facilitates and does not reduce the opportunities for it. In particular, there should be support for the involvement in quality research of academic staff involved in developing and teaching initial and continuing professional education programs.

Second, also related to professional practice, is the formal research of professional practitioners, epitomised by professional doctorates, but also occurring through other programs. The demands and priorities of the senior professional practitioners, who are the usual professional doctoral candidates, are not the same as the usually younger candidates of traditional doctorates whose careers (as academics or as professional researchers) require the formal credential as much as the understandings and capabilities developed over the program.

Third, research impact that is diffuse and complex must be recognised and valued. It is important not to impose or assume a 'commodity' or clearly defined 'product' model of research and its impact that moves from specific research projects with patentable findings to commercialisation based on those patents. A very small proportion of important, high quality educational research would be such a sharply defined 'commodity' or 'product'.

(b) 'Diffusion' is a very significant process of impact for much educational research. Often the most significant impact occurs over time, long after loss of the link with the initial research and knowledge of the responsible researchers. Diffusion often occurs through the practice of expert professionals, who understand and appreciate research, and have a reflective, evidence-based approach to their work. They incorporate the findings of the research of others into their professional judgements, and communicate successes, failures, modifications and so on to colleagues, and, perhaps, back to researchers, educators of the profession and policy makers. Part of the quality of research generally in a field is the development of such expertise among professionals.

(c) See also comments for Issue 3, (b). There might be integration of roles of user, researcher and research manager/commissioner, and the seemingly 'external' may have collaborative connections with the 'internal' researcher.

The following quotation indicates the complexity arising out of this Issue 5 as a whole in just one area of educational research (which may be relevant to other professional/social practices):

> Teachers cannot enter into a culture and practice of continuous improvement of teaching (and learning) without examining and improving their work [and its organisation] in schools. In order to examine what changes and improvements in teaching and its work context can lead to improved learning outcomes for students, teachers need to develop skills of critical reflection and evaluation. To do this, teachers need to be able to tap appropriate research on teaching and learning in schools. Teachers need to become capable of researching their own practice in ways which develop their practitioner knowledge and skills. For this, teachers need both access to, and partnership with, university-based teacher educators whose core business is the transmission and

production of research-based knowledge about teaching and learning.' (Yeatman, A & Sachs, J. 1995 *Making the Links*: A formative evaluation of the first year of the Innovative Links project between Universities and Schools for teacher professional development, Murdoch University.)

Part 3: Applying an Australian RQF

3.1 Level of aggregation for assessment

Issue 6: What is the most appropriate level of aggregation for assessment?

X? Subject/discipline area

X? Research grouping/research team/s

☐ Department/schools

☐ Faculties/Divisions

☐ Institutional level - university/PFRA

Additional comments

What is the most appropriate level will depend on the purposes and processes of assessment. As well as intended and direct consequences of any particular level of aggregation, there will also be positive or negative externalities.

Some of the issues that need to be accommodated include:

- the need for flexibility to allow individuals to collaborate across institutions
- the possibility for individuals to be involved in multiple groupings
- encouragement for researchers to work across disciplines and with external agencies/groupings.

We would tend to prefer the level of subject/discipline or research groupings/teams.

Education tends to be an understood classification in many classification systems. However, we would want to be sure that multi/trans disciplinary work is not ignored or discouraged. Such work often already has barriers and difficulties, yet can be of great importance. For example, there is a great deal of policy pressure from outside universities for greater collaboration between those involved in the 'professional' elements of initial and continuing teacher education and those involved in 'discipline' or 'subject' areas (for example, physics, mathematics or history departments/schools). Collaboration in research would be part of, and support, more general collaboration in course development and teaching.

'Research teams' may be problematic for educational research because they do not have the distinctness and continuity common in some other fields. This may be expressed as: 'educational research teams tend to come together for specific projects, rather than for the enduring research programs more common in, for example, bio-medical research'. However, on-going research centres, many of which are cross-disciplinary, are of increasing importance in educational research.

Faculty/division level would be problematic for education (and other fields) because of the very great diversity of structural arrangements in different universities, and the large size and internal

diversity of many faculties/divisions in which education is located. In many cases in such large units, educational research is strong/intensive compared with that of other fields in the same division. Or it may have quite different natures and impacts, even if of similar quality and intensity.

Aggregation at the institutional level is even more problematic. Like aggregation at the faculty/division level, what is the nature, quality, impact and intensity of educational research may be quite different from that of the institution as a whole. Further, aggregation at the institutional level may inhibit cross-institutional collaboration.

3.2 Who should be assessed?

Issue 7: Who should be assessed as part of an RQF?

☐ Eligible staff nominated by institutions (based on guidelines to be provided)

X A stratified/weighted random sample of all eligible staff

☐ All eligible staff

Additional comments

We have inserted a third alternative above: A representative sample of eligible staff that is not predetermined by the university (or other unit). The sample may be weighted/stratified according to relevant factors such as career stage or teaching load or special responsibilities (such as administration).

To assess all eligible staff would surely be too onerous for the staff concerned and the panels and their administrative support.

There are two clear problems with universities (or other units such as faculty or school) nominating (selecting) staff – whether it is 10% or 80% of all eligible staff.

First, a university (or other unit) where 100% of staff, say, are top quality researchers would be deemed equivalent to a university where only 10% or 80% (using above alternatives) are top quality researchers. This is inequitable (and invalid as a measure).

Second, and most importantly, such a scheme would provide powerful incentives that would work against the quality and impact of research overall, especially in fields such as education where diversity is crucial to overall quality and impact. It would also militate against the development of a research culture among beginning professionals if teaching staff involved in initial professional education have reduced opportunities for research. The incentive would be to nurture and support just the top 10% or 80%, provide them with reduced teaching loads, equipment, conference funds, research assistants etc at the expense of other staff (and the research they may do). This is also very inequitable, inefficient, and would have damaging consequences.

3.3 Link to training of researchers

Issue 8:	The training received by higher degree students in research requires a separate quality audit and/or assessment process.				
☐	Strongly agree	☐	Strongly disagree	☐	No comment
☐	Somewhat agree	X	Somewhat disagree		

Additional comments

Research training may require a separate process of evaluation for development/improvement.

However, the work of research students is integral to the research enterprise of universities. In education (and some other fields) research students undertake a significant proportion of research. Research students are a vital conduit for impact: it is through the engagement of professional practitioners with education faculties/departments in universities as research students, and the implementation through their professional practice of what they have come to learn and understand through that engagement (concerning the research of university colleagues as well as themselves) that much impact of educational research occurs. Indeed, most education research students study part-time and are involved in their professional practice on a daily basis.

A number of other points need to be made (in addition to relevant points under other headings):

- whether or not the RQF includes research training, it should not provide institutions and faculties/departments with disincentives to invest in research training, particularly in the current context where 60 per cent of education AOU staff are aged 50 or over (and 45 per cent of all academic staff are aged 50 or over) and the need for their replacement is imminent
- assessments in research training need to focus on the extent of value added rather than simply on completions
- A RQF that includes research training needs to accommodate diversity and difference in how this training is done
- the involvement of researchers in professional associations and their contribution to research training in these forums needs to be acknowledged.

3.4 Focus of assessment

Issue 9:	Assessment for an RQF should include a forward-looking strategic element as well as being based on past performance.				
☐	Strongly agree	☐	Strongly disagree	☐	No comment
X	Somewhat agree	☐	Somewhat disagree		

Additional comments

This issue points to an inherent problem in such exercises for general (block etc) funding: As an assessment they will be largely concerned with what has already been done. Yet the outcomes of the exercise are concerned with future research and related activities. It is the future that is important, including 'positive behaviours' that are encouraged (*Issues Paper* p. 14) or 'negative behaviours' discouraged, as well as any direct financial consequences.

Whether or not there is a 'forward-looking strategic element' in any assessment, it is essential that planning of the RQF should give careful attention to its direct and indirect consequences, and that subsequent review processes should attend to the full range of consequences - intended and unintended.

A number of issues are raised in other parts of this response, (especially in our additional comments at the end), but one of the important ones is the generational change that will occur over the coming decade, when around half of the academic staff in many faculties/departments will retire and be replaced. This will occur to a greater extent in education than in (most) other fields – as noted earlier, in 2004 60 per cent of education AUO staff and 45 per cent of all academic staff were aged 50 or over. Thus the *use* made of the outcomes of any assessment exercise must take account of the changes occurring in staffing (and staff roles) between the events that the assessment is based on and the activities it is intended to support, encourage or discourage. Future research *capacity* of disciplines/fields, departments/faculties and institutions, and the *capability* of individuals, should be enhanced, not reduced.

3.5 Reporting arrangements

Issue 10: How should the outcomes of an RQF be reported?

(a) Reporting the outcomes of an RQF should be aligned to:

☐ Subject/discipline areas

☐ Research grouping/research team/s

☐ Department/schools

☐ Faculties/Divisions

☐ Institutional level – university/PFRA

(b) Reporting on subject/discipline areas within any level of aggregation for the RQF should be aligned to the ABS RFCD codes or an appropriate subset.

☐ Strongly agree ☐ Strongly disagree ☐ No comment

☐ Somewhat agree ☐ Somewhat disagree

Additional comments

(a) The alignment of reporting will depend in part on the purposes and audiences of such reports. For example, reporting to the education sector so that access to, appreciation of, engagement with and financial support for educational research is enhanced would generally require alignment with the subject/discipline of education, with other information to provide

context. Similarly, reporting to a regional community about the engagement of the local university with the issues of concern to that community would generally require alignment at the level of the institution. Alternatively, formal reporting for audit or the allocation of resources will require reporting strictly aligned to the unit of assessment.

In general, appropriate levels of reporting depend, in part, on the level/alignment of the assessment. Some pros and cons of the different levels were discussed earlier under Issue 6, though the purposes and nature of reporting differ from that of assessments.

(b) reporting can only be aligned to particular classifications if original data classifications so permits. Educational research activities tend to be similarly included in the Education/Education and Training category in each of the three classification systems referred to, and so choice of system probably does not have the serious implications that it would have for other fields/disciplines.

The RFCD tends to suit university structures and social/cultural areas of society and is more explicit regarding different professional fields, while the SEO suits an economic analysis, and ASCED a broad occupational/industry analysis. In general we consider the RFCD to probably be most useful for effective assessment of research quality/impact. However, as noted earlier, assessing/reporting according to subject/discipline may well inhibit or undervalue trans/multi disciplinary research – and thus broader categories may be more appropriate.

Reporting to the general public should take account of the substance of the assessments and how these can be most usefully communicated to particular audiences to achieve certain purposes, which might include (if appropriate/deserved) a greater trust in and appreciation of research in general or in a particular field, and a willingness to support funding and to initiate research funding and support by non-Commonwealth agencies (public and private, large and small).

Issue 11: What should be the format of the ratings/rankings/benchmarks of an RQF? Please provide examples.

The format needs to take account of diversity and complexity, while allowing comparability appropriate to purposes. For example, to allocate a set dollar amount fairly among competing entities (researchers, departments or institutions) requires transparent and valid comparability, while encouraging a range of positive behaviours requires nuanced, qualitative information.

3.6 Links to funding

Issue 12: The resource intensity required for an RQF should be directly related to the level of funding that it informs.

☐	Strongly agree	☐	Strongly disagree	☐	No comment
X	Somewhat agree	☐	Somewhat disagree		

Additional comments

This is a good starting principle. However, other outcomes (encouraging positive behaviours, discouraging negative behaviours etc) need to be taken into account, as should be any externalities. A cheap and nasty exercise, even if only a small amount of funding depended on it, could be very damaging.

3.7 Administrative benefits

Issue 13:	An RQF ought to lead to commensurate reductions in reporting requirements for other Australian Government research accountability mechanisms.				
☐	Strongly agree	☐	Strongly disagree	☐	No comment
X	Somewhat agree	☐	Somewhat disagree		

Additional comments

Data collected could be used for more than one purpose. Unnecessary duplication should be avoided. However, accountability and other purposes should be achieved, and an RQF designed for another purpose may not achieve those accountability etc purposes. Any implementation of an RQF should not be disproportionately onerous. In particular, it should not be onerous for researchers being assessed and their colleagues.

OTHER COMMENTS

AARE welcomes the broad principles behind the RQF initiative (a concern with impact including public benefit, flexibility and responsiveness to differences in research types, and lightness of touch), and the consultative processes to date and planned.

Our major concerns/issues around research for and in professional practice, generational change, and inappropriate categorisation of institutions, have been raised in several places. We would like to now comment further on purposes and outcomes, and briefly on assessment of research for professional practice.

Purposes and outcomes of a RQF assessment

We believe that more attention needs to be given to the preferred or likely purposes or outcomes of a RQF and its implementation. We note the accountability and funding purposes presented in general terms in the Issues Paper and consultations. However, we suggest that these and the 'positive behaviours' that an RQF could encourage and value (p. 14) have been given insufficient consideration, and there has been little if any reference to negative outcomes to be avoided (or negative behaviours to be discouraged).

First, some important matters are not among the listed positive behaviours to be encouraged, including:

(a) matters related to professional practice such as 'inducting professionals into a research culture and encouraging and developing capabilities for evidence-based practice' (this is not the same as the technical application in practice of research findings without their incorporation into professional judgement – important as it may be),

(b) developing and supporting the collective research capacity of fields/disciplines (especially in regions/institutions where needed), including in the context of generational change,

(c) confidence in research findings and encouraging industry and other support and funding for research (this is important for education, given the very low proportion of educational research funded and carried out outside universities – see NOTE 1 below)

(d) further developing the capabilities of mid career and experienced researchers, career changers, etc (as well as early career researchers).

(e) development, where appropriate, of larger scale mission-oriented research programs to meet significant social needs. This is also important in education (except, perhaps in VET because of the operation of NCVER), because, since the demise in 1981 of the Education Research and Development Committee, there has not been a structure for the discussion, formulation, funding and implementation of such programs except on an ad hoc small scale with limited scope.

Second, there should also be attention to negative (unwanted or damaging or inefficient) behaviours that an RQF should discourage. This could include a range of exclusionary, silo-enforcing behaviours, or pressure to avoid means of dissemination most assessable to Australian professionals and policy-makers etc. While some may appear as the opposites of listed positive behaviours, making them explicit would be helpful.

Third, serious attention needs to be given to how, in concrete ways, the procedures and outcomes of a particular assessment exercise, based on a particular RQF, can encourage each of the positive behaviours, and discourage each of the negative behaviours. Each particular feature of an RQF (such as those covered by the various Issues) should be evaluated according to its likely impact in diverse circumstances (different fields of research, different types of institutions, etc), according to various criteria and over various time scales.

We consider it essential that consideration is given to purposes and outcomes as models/options of RQFs are developed and trialled. Alternatives should be judged according to their outcomes (actual or likely) across a range of specific positive and negative possibilities, as well as according to administrative/'workability' criteria.

NOTE 1

According Australian Bureau of Statistics data (*Research and Experimental Development: All Sector Summary, Australia, 2002-03*, Cat. No. 8112.0):

- *Regarding financial expenditure:* the higher education sector accounted for 78 per cent of all expenditure on educational research (specifically, research directed towards the 'education and training socio-economic objective'), but only 30 per cent of expenditure on all research (directed towards all socio-economic objectives) (Table 5, page 12).
- *Regarding human resources (person years) devoted to research and development:* the higher education sector accounted for 90 per cent of human resources devoted to educational research, but only 48 per cent of human resources devoted to all research (Table 8, page 15).

Assessing research for professional practice

Towards the end of the consultation process (at the Canberra consultation) input was sought on specific criteria for assessing research for professional practice. AARE would like to make a further submission on this matter after we have done additional work. In particular, after a two day focus conference, 'Quality in Educational Research: Directions in policy and practice', we are holding on 4-5 July at which this will be a major theme.

In the meantime, work done by the UK Economic and Social Research Council, reported in an ESRC Research Briefing, *Assessing quality in applied and practice-based educational research,* may be of value. It can be found on the web at:
http://www.esrc.ac.uk/esrccontent/DownloadDocs/assessing_quality_briefing.pdf .

An author of the report, Professor John Furlong (Director of the Department of Educational Studies, University of Oxford) will be one of the international speakers at the AARE July conference. Other speakers who will be addressing issues related to research for professional practice include Dr Adrienne Alton-Lee, of the New Zealand Ministry of Education Iterative Best Evidence Synthesis Programme, and Professor Lyn Yates of the University of Melbourne.

Information about the AARE July conference, which will held in Cairns, can be found at <http://www.aare.edu.au/focus/cairns/index.htm> .

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