



Professor Emma Johnston AO FAA FTSE FRSN
Deputy Vice-Chancellor (Research)

18 December 2023

Rochelle Lenane
Director
Research Funding and Students | Research Policy and Programs Branch | Research
Division
Australian Government Department of Education

By email: RBGrants@education.gov.au

Dear Rochelle,

The University of Sydney appreciates the opportunity to provide feedback on the revised draft Higher Education Research Data Collection (HERDC) specifications for the collection of 2023 data released for comment on 1 December 2023.

The revised draft specifications propose to remove text at the top of '**Section 4.3 Income involving other parties**', which is helpful for providers and their staff when making decisions about what **is not** considered 'third-party' income for the purpose of HERDC reporting.

As the HERDC specifications do not clearly explain what the term 'third-party income' is intended to encapsulate, we request that the Department reinstate the proposed deletions highlighted in yellow text below:

4.3.1 Eligible third-party income

Net receipted income is intended to identify only the income that a HEP (or its subsidiary) receives for its own R&D activities.

~~R&D income administered by a HEP on behalf of a third-party R&D organisation where the third-party conducts the R&D independently of the HEP must be excluded.~~

~~The following instances are not considered as third-party income:~~

- ~~• Where the third party is a subsidiary of the HEP;~~
- ~~• Where the third party is an affiliate of the HEP;~~
- ~~• Where a HEP has made payments to a third party for goods and services in support of the conduct of R&D under the control of the HEP.~~

We have recently become aware that this text was deleted in the marked-up version of proposed further amendments to the HERDC 2023 specifications circulated by the Department in August this year.

We missed this significant change at the time because it was not shown in mark-up in the way that all other changes proposed in that version of the draft specifications had been. We first became aware of these proposed deletions when we prepared a marked-up comparison of the November 2022 and December 2023 versions of the 2023 draft specifications.



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We request that this text is reinstated for the 2023 specifications to provide additional clarity about the income that needs to be reported in the '**University**' and '**Affiliate**' columns of the HERDC respectively. Should reinstatement of this text not be possible, then we would welcome a conversation with the Department to understand the rationale for its deletion.

Thank you for considering our request and please do not hesitate to contact me if you would like to discuss this feedback.

Yours sincerely,

(signature removed)

Professor Emma Johnston
Deputy Vice-Chancellor (Research)