

University of Sydney submission to the *New research block grant data requirements, Consultation paper, January 2016*

As submitted 15/3/2017.

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PART 1 Potential new approaches: the Australian Competitive Grants Register

Issue 1: ACGR application and assessments process

Question 1 - Please indicate your preference:

- Option 1: No ACGR
- Option 2: Open ACGR
- Option 3: Maintain current arrangements
- **Option 4: None of the above**

Question 2 - If none of the above, please outline your alternative proposal

Option 4 (A hybrid of 2 and 3).

We recommend the continuation of centrally maintained ACGR inclusion criteria and compilation and publication of a definitive ACGR list to ensure the quality of the included bodies and schemes and facilitate consistency in reporting of competitive income across the HEPs.

The ACGR drives nearly 50% of the RBG funding to HEPs, a strong incentive for HEPs to maximise their reported Cat1 income. We appreciate DET's intentions in proposing HEPs self-assess at the individual grant level, and the workload the status quo generates for DET, but are concerned that such flexibility (deregulation) risks inconsistent reporting by HEPs and potentially generates considerable work for DET to monitor and harmonise interpretations. We believe that only a small additional amount of quality 'competitive' income would be captured by assessment at the grant level.

We recommend DET set ACGR criteria at the scheme level, however, the ACGR could be curated on behalf of the HEPs and DET by another entity – e.g., Universities Australia. Enhancements could be achieved by refining ACGR inclusion criteria, educating granting bodies to include 'competitive' & 'research' in award letters, and ongoing or more frequent assessment of new schemes.

We welcome the creation of a single RSP funding pool with flexibility on expenditure of funding, but we are concerned about the impacts on the sustainability of the dual funding system when HEPs may deploy RSP to direct costs of research without any portion being explicitly dedicated to indirect costs of ACGR research. Where RSP covers short-falls in direct research costs what incentive have funding bodies, including the ARC and NHMRC, to fully fund grants.

PART 2. Improved measurement of the research training system

Issue 2: More comprehensive data on HDR completion timeframes

Question 3 - Is the proposed model appropriate?

Question 4 - Are there any technical barriers to implementation? For example issues with reporting leave data, or reporting undergraduate completions by month.

Question 5 - If there are any other issues that should be considered, or you have an alternative model, please outline these here.

A3. *We support the four proposed changes to capture in HEIMS a HDR student's thesis submission date, their completion year and month, 'effort' as measured by EFTSL, and candidacy time.*

A4. *There may be some technical issues relating to the reporting of leave data, but these should relatively easy from providers to address through changes their policies, processes and systems.*

A5. *One issue where we believe DET's assistance is needed, if not essential to yield reliable comparators, is to standardise the time-point recorded for HDR completions. There are currently four possible time-points potentially used by different providers:*

1. *Submission of an examination-ready thesis*
2. *Submission of a revised thesis post-examiners comments*
3. *Completed requirements (i.e., the 'award letter' from the Dean)*
4. *Conferral*

We think the standard date for effective completion should be 1: Submission by the student of an examination-ready thesis, as this most clearly captures the candidacy process. Everything after this point is a function of individual HEP processes and the vagaries of examinations.

Issue 3: Industry engagement data for HDR students

Question 6 - Is the proposed new unit of measurement (i.e. industry engagement reported as EFTSL) appropriate?

Question 7 - What definition of 'industry engagement' should be used for the new HDR engagement element and what activities should be included?

Question 8 - Are there any technical barriers to implementation? For example, issues with tracking engagement HDR enrolments.

A6. *The proposed collection of data about the time students spend on industry engagement activities alone is not likely to produce very useful information, and would appear to open to manipulation and exaggeration.*

Moreover, time by itself gives no indication whatsoever about the quality of the engagement or the outcomes achieved.

A7. *We do not have a definition of engagement that makes sense for HDR. For example, having an 'industry' supervisor on an HDR project will mean 100% engagement even if the project is standard 'pure' research. An effective definition and hence, measures of engagement, are needed. For example, reporting of time spent 'on site' in an industry/engagement aligned project would be more effective than recording the supervisory input.*

Providers could be asked to give thought to other more meaningful outcome/output related measures of the quality/impact of the engagement involving HDR students.

If time data are to be collected, there would need to periodic qualitative reviews undertaken to ensure that the time data are supplemented with more meaningful information about the actual nature of the collaborations. The ARC's proposed research impact and engagement process could potentially play a role in this regard.

A8. *The lack of a consistent and coherent measure and/or metric prevents HEPS from commenting or providing data. With respect to HDR engagement on industry related projects, these are better collected by the ARC's impact processes.*

Issue 4: Field of Research Reporting

Question 9 - Are institutions able to accurately classify HDRs at the six digit FoR level?

Questions 10 - Are there any technical barriers to implementation?

A9. *We support these proposals for reporting at 6 digit FOR.*

These data should come from the thesis on submission rather than candidature, as a HDR projects must have the capacity to change direction and emphasis.

A10. *The University of Sydney reports no such barriers.*

PART 3. RBG EXPENDITURE REPORTING

Issue 5: Collecting compliance data

Question 11 - Are there any technical barriers to implementation? For example, complications with providing data through annual financial statements.

The University faces significant technical barriers in terms of implementing and reporting on the proportion of RSP funding to be spent on additional fee offsets for HDR students. This is because our financial systems do not directly associate source and application of funds unless the income is prescribed for a specific purpose or project.

We support the proposed collection and annual reporting of RTP expenditure on fee offsets, stipends and allowances, split between domestic and international HDR students.

Question 12 - What proportion of RSP funding does the HEP intend to use to support additional fees offsets for HDR students?

- **No funding to support additional fees offset for HDR students**
- More than 0 and less than 5 per cent
- 5 – 10 per cent
- 10 – 20 per cent
- More than 20 per cent

Final Recommendation.

Sydney intends that no RSP funding will be directed to support additional fees offset for HDR students.

PART 4 Provisional definitions of the new HERDC sub-categories

Issue 6: Category 2 – Changes to sub-categories

Question 13 - Do the proposed definitions exclude any income currently reported in category 2?

Question 14 - Are there any technical barriers to implementation?

Sydney supports DET's proposals to change sub-categories for categories 2 and 3 to improve classification of end-user engagement. We see no insurmountable barriers to implementation of these proposals given adequate lead time.

We propose, under Q16, that international competitive funding, which is highly competitive and peer reviewed, be moved into Cat1 from Cat3.

A13. No.

A14. *There are no insurmountable technical barriers to implementing the proposed changes to Cat2 sub-categories for the 2018 collections (for the 2017 reference year) provided DET's decision to adopt this proposal is communicated with sufficient lead time.*

Large HEPS (University of Sydney has 419 Cat2 projects in 2016) and HEPS with significant volumes of Cat2 funding, will need plenty of lead time and resources to review business processes, modify grant management systems to record the new sub-categories, and experienced staff to review and reclassify existing Cat2 income. This will be a once-off imposition as new research income can be classified as it is received and entered into systems.

Issue 7: Category 3 – Changes to sub-categories

Question 15 - Do the proposed definitions exclude any income currently reported in category 3?

Question 16 - Are there any technical barriers to implementation?

Question 17 - Are there any proposed sub-categories that are insignificant in size (at a sector level) and warrant a rational consolidation with other sub-categories?

A15. No.

A16. As for 14 above.

There are no insurmountable technical barriers to implementing the proposed changes to Cat3 sub-categories for the 2018 collections (for the 2017 reference year) provided DET's decision to adopt this proposal is communicated with sufficient lead time.

Large HEPS and HEPS with significant volumes of Cat3 funding will need plenty of lead time and resources to review business processes, modify grant management systems to record the new sub-categories, and experienced staff to review and reclassify existing Cat3 income – especially International projects which are more complex than the other sub-categories. This will be a once-off imposition as new income can be classified as it is received and entered into systems.

International Competitive Funding.

DET has raised the option of moving international competitive funding from Cat3 into Cat2. As an alternative, and noting the highly competitive nature of international peer-reviewed grants (run predominantly by government or intergovernmental funding councils), we recommend that consideration be given to moving these into Cat1 from Cat3. See also Q15.

A17. *None that we can identify.*

Question 18 - Do the proposed definitions exclude any income currently reported in category 4?

Question 19 - Are there any technical barriers to implementation?

A18. *No.*

A19. *No.*

Ends/

15 March 2017