



**Australian Government**

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**Australian Research Council**

**Excellence in Research  
for Australia (ERA) Initiative**

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**Making a Submission in Response to the  
*ERA Consultation Paper***

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June 2008

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## **EXCELLENCE IN RESEARCH FOR AUSTRALIA (ERA) INITIATIVE: CONSULTATION PAPER**

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### **How to Make a Submission**

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This document contains notes to assist organisations prepare a submission, as well as the conditions for making a submission. Additionally it contains a submissions pro-forma that should be used for making a submission to the consultation paper on the ERA initiative.

#### **How do I make a submission?**

Submissions can be emailed, faxed and/or posted to the ARC.

Please note that only one submission can be made by each invited organisation.

Please provide your responses to the issues in the relevant spaces on the pro-forma.

If you choose not to respond to some of the issues, please do not delete the issue box, just leave the response area blank or enter 'Nil Response'.

If you have any comments on areas not addressed in this pro-forma please enter them in the space provided at the end of your submission.

#### **Will my submission be published?**

A report analysing the submissions may be prepared by the ARC in which case submissions or parts of submissions may be included in the report. Organisations may request not to have their details made public.

You should be aware that the ARC may be required to release the details of any submission (or parts of it) by the operation of law (for example, if required to do so by Parliament). The ARC can, therefore, give no undertakings that your submission (or parts of it) will never be made publicly available. If you have any concerns about this, the ARC suggests that you obtain your own legal advice.

#### **Other conditions of making a submission**

The ARC will neither consider nor publish any submission that, in the ARC's opinion, contains material that is or may be defamatory, insulting or otherwise inappropriate.

The ARC may include a statement to the effect that the ARC does not necessarily agree with the submission (or part of the submission) and the views expressed in it are those of the author. A statement of this type may accompany any submission or part thereof that the ARC makes publicly available or includes in any report.

The ARC will not treat any information in any submission as confidential to any person.

Other conditions of making a submission are described elsewhere in these notes and in the pro-forma for making a submission.

The ARC may use, reproduce and adapt any submission in whole or in part for any purpose described in these notes or the pro-forma (the "ARC's Rights"). Each individual and organisation making a submission must ensure that the ARC's Rights are not in conflict with (or that all relevant consents

have been obtained in relation to) any right of any person, including copyright, moral rights (as defined in the *Copyright Act 1968*) and any right to control the use or disclosure of information.

<b>Where do I send my response?</b>
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**Email** submissions can be sent to [era@arc.gov.au](mailto:era@arc.gov.au)

**Fax** submissions can be sent to **(02) 6287 6601**.

A signed hard copy of the submission should also be sent to:

**The Submissions Officer  
Research Excellence Branch  
Australian Research Council  
GPO Box 2702  
CANBERRA ACT 2601**

The closing date for all submissions is **30 June 2008**.

If you have any questions regarding the pro-forma or any other aspect of making a submission, please contact the Research Excellence Branch at [era@arc.gov.au](mailto:era@arc.gov.au).

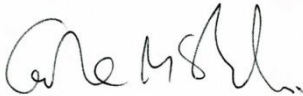
**EXCELLENCE IN RESEARCH FOR AUSTRALIA (ERA) INITIATIVE:  
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**Submission Cover Page**

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Name of Contact Person	Professor Caroline McMillen				
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Does the organisation consent to having its submission identified in a report on the outcomes of this submission process to be prepared by the ARC, which could be made publicly available on the ARC's website? (Y/N)	Y
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Name of Authorising Person	Professor Caroline McMillen				
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Phone	08) 8302 0060	Email	Caroline.mcmillen@unisa.edu.au		
Signature	(required for hard copies only)				

Please ensure that all details on this page are completed.

## Issues for Response

The ARC is seeking feedback from the sector on the issues raised in the Consultation Paper. These issues are highlighted in the pink boxes throughout the Consultation Paper and listed below.

### ***Measures of Research Activity and Intensity, pages 7 and 8***

1. *For the 2008 clusters of ERA, research activity and intensity data will be collected at the two-digit FoR level. Collecting this data at four-digit FoR level over the longer term would provide greater granularity of analysis and reporting. We welcome feedback on any implications that this requirement will have for the span of the reference period in terms of retrospective data collection.*

#### RESPONSE:

The University of South Australia (UniSA) supports the collection of research activity and intensity data at the 4 digit FoR level and would be able to provide data at four digit FoR level for all indicators currently specified.

Currently it is not completely clear what could be included in the proposed Category 5 indicators and UniSA would need to understand all of the elements proposed in this category before commenting on whether there is the capacity to extend the data provision to the four digit level in Category 5.

2. *We recognise that non-salaried staff (honorary and adjunct) often contribute to the overall research effort of an institution. Therefore, we are seeking comments on the extent (if any) to which these researchers should be incorporated into staff FTE reporting.*

#### RESPONSE:

UniSA considers that the issues around inclusion or non-inclusion of non-salaried staff were widely canvassed during the extensive consultation process, which occurred ahead of the Research Quality Framework.

The incorporation of non salaried or adjunct staff in any research performance data collection exercise will result in

- A confounding of both the activity and intensity indicators – as it will be unclear to what extent the level of performance claimed is related to the institutional capacity and mission or the capacity of a range of associated institutions such as CSIRO, DSTO, teaching hospitals etc
- The recruitment by Universities of a range of adjunct staff (many of whom can be associated with more than one University) in order to enhance the likely outcomes in ERA – this would ultimately defeat the purpose of ERA.

UniSA would also highlight that the methods currently in place for assigning staff FTE to Fields of Education for the purpose of calculating student staff ratios are not valid for the purpose of assigning staff to disciplinary fields of research. Extending the use of these data based on undergraduate teaching load, to an automatic description of the field of research activity of individual staff is flawed.

UniSA supports the process whereby institutions nominate staff at the 2 digit FoR level who are appointed at >0.4FTE for submission in each disciplinary cluster. This allows institutions to specify the appropriate FoR for staff in existing and emerging areas of research strength, independently of

their contribution to the undergraduate curriculum. This would ensure ERA is based on an accurate attribution of staff to FoRs.

It is likely and appropriate that there will be research groupings of different sizes but of equal intensity and quality submitted by different institutions. In this context it would be appropriate to indicate the capacity of the groups submitted ( eg 10 staff, 100 staff etc) - large institutions can have small high quality groups and small institutions can have large high quality groups – such differences in expression of research scale and focus between institutions should be encouraged, rather than discouraged and can be appropriately recognised.

### ***Indicators of Research Quality, page 8***

3. *Are there other core indicators of research quality that could readily be included?*

RESPONSE:

Additional core indicators of research quality will vary with discipline. Peer reviewed income should not automatically default to Australian Competitive Grants. Where it can be shown that other funding sources adopt peer review, then these should also be included, for example many CRCs adopt stringent peer review mechanisms, as do a range of state and commonwealth government funding tenders. Australia Council Awards are also an indicator of quality.

We also note that exhibitions and/or performances are equivalent to fundamental primary research outputs (i.e. comparable to journal articles or conference proceedings) and should be categorised as such rather than being categorized as ‘applied’ research (see response to question 10)

### ***Indicators of Success in Applied Research and Translation of Research Outcomes, page 8***

4. *What other discipline-specific measures of excellence in applied research and translation of research outcomes should be considered by the Indicators Development Group, and how should they be benchmarked?*

RESPONSE:

In determining measures of excellence in applied research and translation of research outcomes it will be necessary to recognize the continuum from engagement with end users through to adoption and translation of research into outcomes which have benefit for the end user. It may be appropriate to develop a matrix whereby the level of engagement, translation and calibre of outcomes and benefit are each specified for a nominated disciplinary research grouping.

#### ***Measures of Engagement***

There are a number of definitions in the public domain of what constitutes knowledge transfer activities and engagement.

The most cited and accepted definition of knowledge activities is those:

*‘concerned with the generation, use, application and exploitation of knowledge and other university capabilities outside academic environments’ (Science and Technology Policy Research Unit Report to the Russell Group of Universities, 2002).*

The *SPRU Report to the Russell Group (2002)* drew up a framework which indicated how core university capabilities and activities generate associated third stream activities and developed a list of 12 categories using the SMART approach (i.e. that any metrics developed in this area should be Smart, Measurable, Actionable, Relevant and Timely). The activities included in the list are all forms of knowledge transfer where universities share their knowledge widely to communities and industry to enhance economic, cultural or regional development, industry/business linkages or sustainability.

The 12 categories of these activities included:

<b>PROPOSED CATEGORIES OF KNOWLEDGE TRANSFER ACTIVITIES</b>
<ol style="list-style-type: none"> <li>1. Technology commercialisation</li> <li>2. Entrepreneurial activities</li> <li>3. Advisory work</li> <li>4. Commercialisation and use of university facilities</li> <li>5. Contract research with no academic clients</li> <li>6. Non academic collaboration in academic research</li> <li>7. Flow of academic staff, scientists and technicians</li> <li>8. Student placements</li> <li>9. Active alignment of teaching to economic and social needs</li> <li>10. Learning activities</li> <li>11. Social networking and</li> <li>12. Non academic dissemination</li> </ol>
<i>SPRU Final Report to the Russell Group of Universities, 2002</i>

The *SPRU Report* also includes a list of possible indicators that could be used to measure the volume of each of these activities within any institution. Importantly guidelines for the choice of these indicators were drawn up which included:

- The use of existing datasets where possible
- The use of existing university procedures to generate these data
- Limiting the cost of any data collection
- Development of a measurement system for aggregate, not subgroup level of activities
- Limiting intrusion on individuals
- Limiting the number of indicators per activity section
- The development of indicators across all areas

In this context – measures listed above relating to 1, 3, 5, 6, 7 and 12 could be used to determine the extent of engagement of researchers with professional, industry, government bodies and organisations. In the Australian context, examples of discipline specific measures that could be considered include:

- Licences, options, assignments (number and value), Royalty agreements (number and value), Pilots, prototypes, clinical trials (number) (#1)
- Industry related component of ARC Linkage Grants and CRC funded research (#6)
- Purchase of texts by libraries (for use in undergraduate and postgraduate programs as an important indicator of knowledge transfer particularly in education) (#12)
- Publication of research reports by industry partners, which may not be publicly available because of their sensitivity (#12)

In this context it could be noted that whilst the number of patents could be considered under category #1 as ‘enablers’ of knowledge transfer, they are not direct measures of either engagement or knowledge transfer.

### **Translation, Calibre of Outcomes and End User Benefit**

#### *Assessment Indicators*

UniSA participated in the ATN trial in which case studies were developed in order to determine whether these could be used as an effective vehicle for the assessment of knowledge translation (including adoption) and the calibre of outcomes.

When considering measurement of the translation of research outcomes, one possible approach that the Indicators Development Group should consider is expert review of a sample of outputs/case studies. This possibility is mentioned in the introduction of the ERA consultation paper.

Some measures identified in the ATN trial, which can be reliably attributed to the different stages of the research transfer continuum, are given below in the table on the next page.

<b>MEASURE CATEGORY</b>	<b>INTERMEDIATE RESEARCH OUTCOMES</b>	<b>FINAL RESEARCH OUTCOMES</b>
Economic/Commercial	<ul style="list-style-type: none"> <li>• New products, services (number)</li> <li>• Gross revenue</li> <li>• Start-ups/Spin-outs (no and revenue)</li> <li>• Joint ventures (number and revenue)</li> <li>• Repeat business (% of contracts with previous clients)</li> </ul>	<ul style="list-style-type: none"> <li>• Fuel or time savings</li> <li>• Reduced risk</li> <li>• Increased productivity</li> <li>• Reduced costs</li> <li>• Increased competitiveness</li> <li>• Improved processes/ efficiency</li> <li>• Increased employment</li> <li>• Increased investment</li> </ul>
Social/Cultural and Environmental	<ul style="list-style-type: none"> <li>• Changed practice in waste management</li> <li>• Uptake of recycling techniques developed</li> <li>• New or improved government policy</li> </ul>	<ul style="list-style-type: none"> <li>• Reduced consumption of fossil fuels</li> <li>• Reduced waste</li> <li>• Reduced water consumption</li> <li>• Improved health and/or well-being</li> </ul>

In summary, UniSA supports the view that translation of research outcomes can best be assessed through the use of qualitative and quantitative indicators presented in evidence based case studies associated with each nominated research grouping. It is critical in this regard that end users are included as members of the Research Assessment Committees. With suitable guidelines for both submission and assessment, the extent to which the work has moved along the research transfer continuum from engagement, to adoption and through to measurable outcomes should be able to be assessed.

UniSA supports the ATN view that the Indicators Development Group should host a national workshop to harness the views of a range of institutions, such as those comprising the ATN, which have a strong focus on translational outcomes, in order to develop a more comprehensive suite of measures.

5. *We would welcome suggestions regarding types of practitioner-focussed outlets that may indicate excellence in applied research or translation.*

RESPONSE:

An example of such an outlet is the National Centre for Vocational Education Research (NCVER). Published research reports under DEST have always been considered as Category K; that is, the same as a report produced within a university department and not published (as noted above). The following is proposed as evidence of excellence of this practitioner focused outlet in applied research:

1. NCVER reports are the result of national competitive grants, which in some years have had lower chances of winning (e.g. 17%) than ARC grants.
2. NCVER reports are double blind peer-reviewed at two points, once in the Progress Report stage and then again just before publication.
3. The reports are available for worldwide sale in print form.
4. They are also accessioned into the UNESCO-UNEVOC electronic database (VOCED), and are available for ready/free download anywhere in the world.
5. Australian VET research has developed substantially since 1996 when national funding first became available, and is extremely well respected by other VET researchers and bureaucrats around the world.

These NCVER reports are therefore excellent examples of practitioner-focussed products of research excellence as a result of the stringent processes involved through to their publication.

Further examples include where the work of researchers is cited in the reports of state parliamentary enquiries, or where work is regularly cited by state governments and community/church/welfare sector peak bodies in federal government inquiries (e.g. Fair Pay Commission and Work Choices).

In education and other professional areas, academics receive invitations to provide keynotes and other presentations that are not refereed. These presentations may often be practitioner focused, such as public talks, non-refereed journal articles, professional association work, series publications and edited books. This demand for and interest in the work of these researchers and their research by key stakeholders provides evidence of the relevance of the work to the profession

#### ***Research Income Data, page 9***

6. *How feasible is it to collect category 2-4 research income data at four-digit FoR? Are there specific issues for each category for retrospective collection? Are there specific issues for future collections in Category 3?*

RESPONSE:

UniSA currently collects category 2-4 research income data at four digit FoR level and can provide this for the reference period under consideration. We see no issues in continuing to do this in the future for category 3 research income.

7. *Are all the income categories necessary or appropriate? What additional income streams could be collected under Category 5?*

RESPONSE:

All current income categories are necessary and appropriate. It is important in this regard to recognise that much research income in categories 2-4 is still subject to peer review by sponsors.

Category 5 could include consultancy income but it would seem to be inappropriate for infrastructure funding to be included in this category (given that focus of NCRIS and EIF have an existing well defined focus on building infrastructure capacity).

8. *What would the most useful research income reference period be for ERA, considering this does not need to be the same as the six-year publications reference period(see page 10)?*

RESPONSE:

If Australia is to encourage institutions to respond flexibly to emerging research fields, to engage in interdisciplinary and multidisciplinary research and to support higher degree by research students move into new international fields of enquiry, it is critical that the drivers within ERA are more contemporary than historical.

Wherever possible, the data used should be those which reflect an institution's current mission and performance. For this reason, UniSA supports the proposal that a **2 year reference period** be adopted for research income. This reference period will still be lagged by a year and in this context provides the best representation of the current strengths of a research institution, will minimise the difference between the definition of 'existing' and 'emerging' strengths, and is consistent with the current practice of using 2 year collection periods as the basis for the calculation of RIBG and IGS.

UniSA would also argue that a 4 year reference period for publications would represent the correct balance between capturing a body of work in a disciplinary cluster area and encouraging institutions to invest in active researchers with a current track record, rather than solely in senior researchers with strong outputs produced 5-6 years earlier. If research evaluated in 2009 has a reference period for research published between 2004-2007, rather than 2002-2007, this is still a period stretching back some 5, rather than 7 years.

9. *How practical is it to request numbers of successful grants in addition to research income?*

RESPONSE:

UniSA can collect and provide these data but consider that this may not be a useful practice as it could inadvertently drive a perspective that it is better to compete and succeed in a myriad of small funding schemes than to build larger programs, centres of excellence and cooperative funding programs. The collection of numbers of successful grants could also lead to the same outcome that the current focus on the 'weighted DEST publication points' has i.e. that researchers and their institutions will value 'volume' over 'quality'. Given that discipline specific criteria will be used within each cluster to determine what constitutes a level of research activity or intensity that is internationally competitive, the proposal to focus on research funding alone should not disadvantage discipline groups in which high research quality can be achieved at relatively low funding levels.

10. *A list of other possible publications types is provided in Appendix B of the Consultation Paper. We are seeking feedback on whether there is support for these types to be included for individual disciplines and whether these categories are appropriately identified.*

**RESPONSE:**

UniSA is supportive of the inclusion of a broad range of publications and it would be of concern if only the categories of books, book chapters, journal articles and refereed conference publications were to be included given the relevance of many of the other types of publications in specific fields. It will be essential for the Indicator Development Group to consult with professional bodies/associations and with practitioners in relevant disciplines, in order to develop an agreed set of performance indicators where these are not captured in traditional publication format. This process should be as detailed and inclusive as that used to identify the current ranked tiers of publications and should include consultation with higher education institutions in addition to professional bodies and associations.

It is noted that there is an important difference in reports in the K Category that are double blind-peer reviewed compared with those that are not and it could be argued that where double blind peer review has occurred, that these published research reports are at least as valuable indicators of research excellence as reviewed conference papers, and should be counted as such. It was also noted that collection of such information should be consistent with other processes (for instance, harmonising this data collection with the information gathered on most of these categories for the ARC final report list).

At UniSA we also collect data on the following list of outputs in the visual arts and design field (the weightings ascribed are a measure of parity against the current DEST weightings for books, journal articles, conference proceedings etc).

**Creative Arts & Design Categories**

***J1 – Commissioned and Peer Reviewed Creative Works (Weighting 5.0)***

Refers to refereed creative works including products, prototypes and production; furniture, film, video/digital works; public art and design works; literary works; websites; buildings; landscapes; interiors; installations; performance; materials and systems.

Items in this category must be peer reviewed based upon research criteria by panels of professional and academic peers set up in collaboration with the professional and academic bodies in the field.

***J2 – Exhibition of Creative Art and Design Artefacts (Weighting 1.6)***

This category refers to an exhibition of creative art and design artefacts (individual exhibition invited by curator or gallery committee).

Exhibitions will not be limited to those held in galleries and may include those held in national or international Biennale, Art/Design festivals and conferences etc.

***J3 – Group Exhibition or Awarded Competition Entries (Weighting 1.0)***

This category refers to:

- a group exhibition invited by curator or selection by curatorial committee from an open invitation. Exhibitions will not be limited to those held in galleries and may include those held in national or international Biennale, Art/Design festivals and conferences etc; or
- awarded competition entries including all forms of short-listing, commendation / recognition / finalist entries and winning entries.

***J4 – Purchase of Work (Weighting 1.0)***

Refers to the purchase of a work(s) by an organisation, individual, public institution or a major cultural institution. Where a work has received professional awards or commendations or is purchased by a major cultural institution the work will be weighted at 5.0. For all other cases the weighting will be 1.0.

***J5 – Professional awards and commendations (state, national and international) (Weighting 1.0)***

This refers to an award winning artefact in a national or international design competition. All levels of award may be included. The competition must be advertised in the industry press, professional journal or on the sponsors/organisers web site and be of national or international standing. Awards must also be made via a publicly understood refereeing/jury process.

***J6 – Invited/Commissioned Curation of an Exhibition (Weighting 0.8)***

Refers to curation of an exhibition either by invitation or commission by a gallery or organisation.

***J7 – Invited Catalogue Essay (Weighting 0.4)***

Refers to a catalogue essay invited by a gallery, organisation or exhibitor.

***J8 – Major review of Creative Work (Weighting 0.4)***

Refers to a major review of creative work. Include reviews of buildings, interiors, products, film, literature etc.

***J9 - Non-Refereed Exhibition (Weighting 0.25)***

Refers to a group exhibition invited by curator or selection by curatorial committee from an open invitation that does not have a published catalogue. Exhibitions will not be limited to those held in galleries and may include those held in national or international Biennale, Art/Design festivals and conferences etc.

UniSA considers that it will be essential for the Indicator Development Group to consult with higher education institutions, professional bodies/associations and with practitioners in relevant disciplines, in order to develop an agreed set of performance indicators where these are not captured in traditional publication format. This process should be as detailed and inclusive as that used to identify the ranked tiers of publications.

***Publication Reference Period(s), page 10***

11. *Should all non-publication data be collected over a shorter reference period? If so, what would that period be?*

RESPONSE:

For the reasons outlined in response to question 8, UniSA considers that all non publication data should be collected for a 2 year reference period and publication data should be collected for a 4 year reference period.

### ***Attribution, pages 10 and 11***

*12. Please provide comment on the above approaches for attributing publications.*

RESPONSE:

UniSA supports option 1 over option 2 for the reasons outlined in the ERA consultation paper; i.e. that an approach based on where researchers are located at a specific census date will provide for a clear measure of the current research mission and performance of an institution.

We consider that option 1 will not require more effort by universities in collecting information from researchers as Universities are required to collect this information regardless of the ERA initiative.

UniSA considers that the disadvantages of option 2 are greater for institutions as this option requires additional administrative work on top of current data collection processes.

### ***Data Suppliers, page 12***

*13. Which citation data suppliers in your experience result in the most meaningful citation analysis for each of the disciplines?*

RESPONSE:

UniSA is aware that there is a range of citation data suppliers emerging for specific disciplinary areas and considers that the learned academies and professional bodies are in the best position to provide an informed view on this issue.

There are concerns in the sector that selection of either ISI Web of Science or Scopus will place the 'preferred' supplier in the position of charging a premium rate for the provision of data. There should be every attempt made to ensure that there is a 'whole of sector' approach to funding such access which ensures that every institution has access to the relevant data base from any 'preferred supplier' for a ERA disciplinary cluster at a minimal cost.

### ***Research Training Data, pages 12 and 13***

*14. Please provide comments regarding research training indicators. Is it possible to provide HDR completions data retrospectively at the four-digit FoR level?*

RESPONSE:

UniSA can provide the current HDR indicators as contained in the ERA Consultation paper at four digit FoR level (they are currently specified by Field of Education and this will require an additional coding field for each student). This is a resource intensive exercise and the intensity increases with the length of the reference period nominated.

15. *Do you see value in tagging research outputs as authored by HDR students and value in the analyses this will produce?*

RESPONSE:

In principle UniSA supports tagging research outputs authored by HDR students as:

- Most universities estimate that between 65 and 70% of their research is carried out by postgraduate research students and around 25-30% of publications arising from university research has a postgraduate research student as one of the authors [Siddle, D. 1997 Submission to the Committee conducting the Review of Higher Education Financing and Policy from the Deans and Directors of Graduate Education, April 23.]
- The primary purpose of a research degree is to provide training in research. This training will involve conducting a piece of original research, and gaining some experience in the transfer of their research findings through publication and conference presentations. Publication is an integral part of the research training. Therefore tagging research outputs authored by HDR students should be an appropriate activity.

In practice there is a difficulty in tagging the research outputs from HDR students as many papers arising from a research thesis are published after the thesis has been submitted and examined. The counting of those research outputs only published by HDR students during their period of candidature could result in a pressure to delay the completion of HDR students until they have published some or all of their work. This would delay completions and the career aspirations of HDR students.

Given that it is unclear as to how these data may best be used in deriving a final estimate of research activity or intensity, it may be more appropriate for these data to be collected for each cluster in the first ERA cycle as a 'pilot' collection and through the pilot determine how best to integrate the data into the overall summary of assessment for a discipline grouping within an institution. It is noted that by the time the second cycle of ERA data collection commences, the outcomes of the senate inquiry into postgraduate research education and the National Innovation Review and their impact on research training will be clearer.

### ***Submission, page 13***

16. *Institutions are invited to comment on the ease or otherwise of meeting any of the data requirements outlined in this document in addition to the specific questions addressed under particular headings.*

RESPONSE:

As outlined in answers to specific questions above, UniSA is currently able to provide data for the indicators suggested at the FoR level required. We cannot comment on availability of additional indicators until developed by the Indicator Development Group but have made a practice of coding most research performance indicators at four digit FoR level.

It is clear that ERA will place an administrative burden on institutions and it would be appropriate for an 'ERA Resources Reference Group' be set up to work with a range of institutions (selected to represent institutions of different sizes and missions) in order to determine the extent of the additional workload including the specific IT requirements. This would enable the definition of systems and processes required to streamline the submission requirements and would allow a lower error and checking rate in the processes.

UniSA would suggest that it would be better to take a longer period to run the first two cluster analyses in order to enable such a Reference Group to provide feedback on inadvertent consequences for institutions and to ensure that the timelines support a quality, rather than ad hoc process based on flawed and inaccurate data.

### ***Reporting, pages 14 and 15***

17. *We propose there is considerable value in having maximum flexibility and utility with respect to reporting, however, we also recognise the workload involved for institutions in assigning reporting codes. We welcome feedback on this issue in respect to both the feasibility and value of such an approach.*

#### **RESPONSE:**

UniSA considers that it is critical that institutions nominate researchers relevant to the disciplinary cluster being evaluated from across academic units and that the reporting is therefore not on the basis of academic units. In the assessment it is also critical to differentiate institutional capacity from activity or intensity. It is important that small high quality research teams that represent an institutional submission within disciplinary cluster are recognised for the quality of the research - whilst recognising that there is less capacity within a small team than in a larger research submission in the same cluster from a different institution. Accordingly, UniSA suggests that:

- Institutions nominate academics that are research active within the disciplinary cluster
- ERA reports on capacity as well as research activity, intensity, quality and translation.

### ***Examples of Indicators Outputs – Research Training, pages 16 and 17***

18. *Institutions are invited to comment on the feasibility or otherwise of institutions identifying student authorship in previous HERDC collections.*

#### **RESPONSE:**

UniSA can currently identify HDR student authorship for publications in previous HERDC collections but please note response to Question 15.

#### ***Other Comments***

#### **RESPONSE:**

The ERA Consultation Paper proposes (page 7) not to include category 3 research income to assess research quality (only research income based on peer review). In business disciplines, and possibly others, industry sponsorship is a clear indicator of research quality.