

# ERA 2015 Consultation - Feedback Template

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## Australian Research Council Draft ERA 2015 Submission Documentation – Public Consultation

**Note:** All feedback should use this template and be emailed to [era@arc.gov.au](mailto:era@arc.gov.au) with “ERA 2015 Submission Consultation” in the subject heading.

### Contact Details (required)\*

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Is your feedback provided on behalf of an institution or as an individual?	On behalf of an institution				
Name of institution or organisation (if applicable)	Australasian Council of Deans of Arts, Social Sciences and Humanities				

\*Anonymous feedback will not be considered. Institutions/organisations should include **all feedback in a single consolidated** written response.

### 1. Draft ERA 2015 Submission Guidelines

Please indicate any feedback you have on the *Draft ERA 2015 Submission Guidelines*. Please provide clear reference to the topic and section number for your feedback.

Response

#### ***Section 4.2.3 Outcome Reporting***

The Council of Deans of Arts, Social Sciences and Humanities (DASSH) has concerns about the intention of the ARC to publish ‘output volume information for all assessed Units of Evaluation’. As the ERA objectives state, the purpose of ERA is to provide ‘an evaluation framework that gives... assurance of the excellence of research’, but publication of a volume measure would, on face value, appear to undermine the primary focus on research quality. It is not difficult to foresee that pseudo league tables could be constructed that focus upon volume and thereby lessen the impact and significance of the fundamental purpose of ERA; namely an assessment of research excellence. The move to include output volume runs contrary to international practice, such as the UK’s REF or NZ’s PBRF.

The publication of volume data implies that ‘size does matter’, assumes a relationship between volume and optimal quality, and lessens the focus on the quality of research publication outlets and the significance of the actual research. If volume becomes used as a proxy measure of quality, it may fuel a ‘publish or perish’ approach among the academy that existed before the

introduction of the ERA. Publication volume is already collected and made publically available via the HERDC.

Assuming the motivation for reporting volume data is to allow for better comparisons between outputs in a given FoR, we suggest that distribution of outputs by publication type (relative to the average distribution for that FoR) would provide useful comparable data without inviting the inference that output volume, rather than quality is being assessed by ERA.

### ***Section 5.2 Explanatory Statements***

DASSH notes and welcomes that the Explanatory Statements that can accompany the data submission are provided at the two-digit level ‘but may be structured to address the relevant four-digit Field of Research Codes that lie beneath’ (p. 22).

#### ***Section 5.3.1.1 Key Eligibility Criteria for Researchers: Publication Association for Staff Employed at Less Than 0.4 FTE***

DASSH notes the relaxation of the eligibility criterion for staff with a publication association and employed below 0.4 FTE, whereby it is proposed to count the whole corpus of work of a researcher if a publication association can be shown for a single publication. This relaxation will lead to ‘gaming’ and misrepresentation of research quality, as institutions will be rewarded for appointment of international colleagues at low FTE (e.g. 0.1) in order to pump prime their FoRs; effectively leading to a market of buying CVs, and ultimately distorting the productivity and quality produced by Australian institutions.

#### ***Section 5.3.2.2 Gender***

DASSH applauds the inclusion of gender related data so that research quality and output can allow for gender analyses to be undertaken. These analyses can then inform further understanding of the ways in which gender relates to research opportunities and outcomes.

#### ***Section 5.4.3.1 Assignment and Apportionment of FoR Codes for Eligible Research Outputs***

DASSH welcomes the retention of the flexibility in the rules for assigning FoR codes to research outputs that were introduced in 2012. In particular, the ‘reassignment exception’ has been retained for journal articles.

“In the case of articles published in journals for which a two-digit FoR code is identified in the Draft ERA 2015 Journal List, institutions may assign to the article any four-digit FoR codes from within the two-digit FoR code identified for that journal.” There is concern that researchers who work on interdisciplinary areas may not be able to have their work appropriately recognised within their primary FoR because the hierarchy of two- or four- digit FoR used to identify a journal’s focus may not line up with the FoR that reflects the disciplinary expertise of the researcher. DASSH suggests that institutions should have flexibility to assign four-digit FoR for interdisciplinary outputs in journals that have an assigned two-digit FoR.

#### ***Section 5.4.8.5 Journal Articles —Refereed, Scholarly Journal***

The date of publication rules have become quite complex, particularly in relation to ‘Year Published versus Year Available’ (p. 43). This may come into play where journal articles

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have been published online in 2013, but will not be published in the hard copy of the journal till a later year. Given the volume of work involved in preparing ERA submissions, this complexity adds an extra burden on institutions (and researchers) to track dates and articles in non-indexed journals with very little impact on assessment (assuming that our recommendation concerning reporting of volume of outputs in section 4.2.3 is accepted).

### ***Section 5.4.8.7 Conference Publications — Full Paper Refereed***

It is noted that for conference proceedings to be eligible, the conference has to be of ‘national or international significance’. Without providing further guidance on how to assess this significance this definition will introduce a non-comparable subjective element into the submissions. Either a list of relevant conferences or measure of significance is required.

### ***Section 5.4.9 New Category of Non-Traditional Research Outputs***

Given the nature of outputs from the Arts, Social Sciences and Humanities (ASSH) sector, the creation of a new fifth category of non-traditional research outputs entitled ‘Research Report for an External Body’ is welcome. The proposed updates to some of the descriptions of non-traditional research output subcategories from ERA 2012 have increased clarity about the criteria for inclusion in this category and this is welcome.

Appendix C provides the guidelines for the ‘Contents of Research Statement for ERA Peer Review of Non-Traditional Research Outputs’. The current length has been maintained at 2000 characters (approx. 250 words). DASSH suggests that the ARC consider increasing the length of the statement to be up to 4000 characters to strengthen the capacity for institutions

## **2. Draft ERA–SEER 2015 Business Rules and Verification**

Please indicate any feedback you have on the *Draft ERA–SEER 2015 Business Rules and Verification*. Please provide clear reference to relevant business rule numbers in your feedback.

Response

DASSH has no concerns with the draft business rules and verification.

## **3. Draft ERA–SEER 2015 Technical Specifications**

Please indicate any feedback you have on the *Draft ERA-SEER 2015 Technical Specifications*.

Response

DASSH has no concerns with the draft technical specifications.

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### **4. Draft ERA 2015 Discipline Matrix**

Please indicate any feedback you have on the *Draft ERA 2015 Discipline Matrix* (the ARC is seeking feedback about any changes to the nominated indicators for each discipline cluster for ERA 2015).

Response

DASSH is supportive of the draft ERA 2015 Discipline Matrix.

### **5. Draft ERA–SEER 2015 Technology Pack**

Please indicate any feedback you have on the *Draft ERA–SEER 2015 Technology Pack*.

Response

DASSH has no concerns with the draft technology pack.

### **6. General comments**

Please indicate any additional feedback you have on the development of the ERA 2015 submission documentation.

Response

No further comments.