DASSH Response to the Department of Education and Training’s Consultation Paper:

*Sharper incentives for engagement:*

*New research block grant arrangements for universities*

The Australasian Council of Deans of Arts, Social Sciences and Humanities (DASSH) welcomes this opportunity to respond to the Department’s consultation paper.

In summary, DASSH endorses the emphasis on simplifying systems and reporting requirements, incentivising engagement with end-users, and recognising that Australia has a mature university system in which individual higher education institutions should determine the best use of their research funding (with appropriate reporting requirements). We also applaud the proposal to double weight HDR completions by Indigenous students within the RTP allocation formula.

1. **Does RSP funding require limits on allowable expenditure? If so, would the proposed restrictions allow sufficient flexibility to support HEPs research activities?**

   With appropriate reporting requirements in place, DASSH endorses the removal of all restrictions on the expenditure of RSP funding on the basis that the best use of funds will vary for different universities and that maximising university autonomy in this sphere should promote innovation.

   Acknowledging the reality of research students’ integration into HEPs’ research activities aligns with the broader emphases of this consultation paper; excluding costs associated with supporting HDR students is not practical.

2. **What information could HEPs provide to best demonstrate value for money and performance under the RSP?**

   DASSH supports the Department’s suggested measures around number of researchers/research support staff (with the comment that an FTE measure may be most appropriate), type and number of research outputs, and number of research projects. Individual HEPs are best placed to respond to this question, given the emphasis – which DASSH supports – on keeping reporting requirements as low as possible for HEPs.

3. **Should a cap be imposed on international enrolments or should enrolments be unrestricted and monitored over time?**

   Enrolments should be unrestricted and monitored over time. Overall, the proposed block grant changes will (further) prioritise enrolment of high-performing candidates with good potential for timely completion.
Under current University funding arrangements, there are institutional pressures to accept International fee-paying or supported HDRs on an uncapped basis. The emphasis on timely completions may strengthen and/or retard that desire to recruit international HDR candidates (or international students from particular regions), given current higher completion rates among international students versus perceived additional support requirements for international students.

4. **Which key dimensions of RTP support (such as the type of students, total amount of support and stipend levels) would reporting need to include to ensure the program is meeting its policy goals and no undesirable consequences are occurring?**

Reporting should include details about disciplinary areas and occur within a framework that recognises the diversity of end-users and impact. Any tendency to narrowly interpret industry engagement risks excluding key components of the Australian economy and society, such as the creative industries, NGOs, the education sector and the public sector.

Because of measurement by completion, opportunities for candidates at risk of longer candidatures due to disciplinary norms or, more importantly, SEO factors or experience of disability, mental illness etc., should be monitored by institutions.

Pressure for fewer, higher offer scholarships at select institutions or in specific disciplines may create a tiered system not conducive to innovation or best practice in the longer term.

5. **Are the proposed RTP eligibility criteria an improvement on current arrangements? Are there likely to be any unintended consequences?**

The simplification of requirements is an improvement on current practices, and removes complexity, confusion and some areas of discrimination, particularly for candidates moving from one institution to another, and candidates for whom part-time enrolment would enhance employment or family options.

6. **Is the proposed approach to defining RTP benefits a better approach to meeting the goals of the program? Are there likely to be any unintended consequences?**

**AND**

7. **Will the flexibility to set maximum stipend rates result in competition across the sector and mean that most students will receive the maximum level of RTP support and cause a substantial reduction in HDR student numbers? If this is a likely risk what constraints should be built into the new arrangements?**

Within the Arts, Social Sciences and Humanities (ASSH) sector, a relatively limited number of students receive RTP support beyond the minimal amounts required (the norms are smaller scale top-up payments which fall well within the proposed funding ranges to provide incentives in certain fields/areas or for work on particular research
projects). Hence the approach to defining RTP benefits would not adversely affect our cohorts or our abilities to recruit high quality PhD students. However, if the flexibility to set maximum stipend rates creates incentives within universities to allocate larger top-ups to students in higher cost disciplines, then it will have an adverse effect on our disciplines and thus reduce the total number of funded HDR candidates in ASSH disciplines. The option in the consultation paper of limiting higher value support to HDR students in fields of research with demonstrable industry engagement such as a formal program of industry placements again raises concerns about the risk of narrow interpretations of ‘industry’ or inflexible approaches to industry placements.

8. **Is the proposed length of RTP support a better approach to meeting the goals of the program? Are there likely to be any unintended consequences?**

   The proposal to make RTS, IPRS, and APAs consistent in terms of length of candidature would be welcomed by the ASSH sector as it establishes a more equitable and consistent system which also is easier to implement and promotes higher levels of research excellence. We foresee no adverse consequences in our sector.

9. **Is the proposed approach a better approach to meeting the goals of the program? Are there likely to be any unintended consequences?**

   The new approach in allowing HEPs to determine their own competitive processes will allow broader criteria to be used and greater flexibility to the institution and will encourage distinctiveness and autonomy of research directions. Requiring research policy to be advertised publicly is critical to the success of this new approach and would ensure transparency and equity across the sector. The real challenge is ensuring sufficient institutional support for HDR programs in ASSH disciplines.

10. **Would the proposed provide clarity to students regarding RTP processes and entitlements? Are there likely to be any unintended consequences?**

    The proposed approach could provide clarity and transparency to students because the institutional Scholarship Policy would be written by each HEP and would be read in conjunction with that institution’s existing academic regulations. There would need to be some national consistency on some of the elements because students transferring between institutions may otherwise be adversely affected.

11. **Are the proposed transition arrangements sufficient for continuing students? Are there likely to be any unintended consequences?**

    The transition arrangements appear sufficient and there do not seem to be any unintended consequences. Institutions have been proposing and communicating transition arrangements to students in coursework programs and are well versed in advising students in this domain. However, DASSH does stress the need to ensure that arrangements are clear for intending applicants for 2017.
12. Would the proposed arrangements help the monitoring and benchmarking of student outcomes? Should the department consider collecting any other types of HDR student data such as level of support provided and a stipend amounts for individual students?

While the proposed additional data collection is appropriate, DASSH believes that the purpose of benchmarking student outcomes needs to be clarified. Definitions of end-users need to be appropriately inclusive, not narrowly defined, to effectively understand and monitor the range and impact of HDR students’ engagement. It is currently difficult to track HDR alumni. DASSH hopes that one of the benchmarking aims would be to make this easier.

13. Would the proposed changes to Categories 2, 3 and 4 result in more appropriate and reliable measures of research engagement? Should the department consider collecting any other types of engagement data?

The current proposals relating to Category 2-4 income as a proxy for engagement/impact are problematic for the ASSH disciplines. Our sector’s engagement with external partners (including engagement through Category 1 grants) is underpinned by significant in-kind support from external partners: the most valuable contribution made is the time, expertise and informed advice of both the academic and end-user partners. Failure to recognise in-kind contributions will disadvantage our sector as researchers rely heavily on in-kind support for Category 2 and 3 projects, with industry partners typically drawn from the public sector; the Galleries, Libraries, Archives and Museums sector (GLAM); and Non-Government Organisations. Therefore, DASSH advocates the collection of data on in-kind contributions to research (noting that such data is available, for example, in ARC Linkage grant applications).

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About DASSH

The Australasian Council of Deans of Arts, Social Sciences and Humanities (DASSH) is the authoritative agency on research, teaching and learning for the Arts, Social Sciences and Humanities (ASSH) in Australian and New Zealand universities.

DASSH supports those within these institutions who have responsibility for the governance and management of research and teaching and learning in their universities. DASSH also supports those who aspire to these positions through a Network of Associate Deans (Learning and Teaching) and a Network of Associate Deans (Research).