

University of Sydney feedback on the 2023 Excellence of Research for Australia (ERA 2023) Draft Submission Guidelines, and associated ERA-SEER technical specifications, business rules and discipline matrix.

General comments

The University of Sydney welcomes the opportunity to provide feedback on the ERA 2023 Draft Submission Guidelines.

Overall, the University is pleased with the proposed changes to the guidelines, which largely respond to the recommendations of the ERA EI Review and the adoption of the ANZSRC 2020. Significant changes to the ANZSRC have occurred between the 2008 and the 2020 iterations, including updates to Fields of Research (FoRs) and the introduction of the new FoR 45 Indigenous Studies. Adopting the ANZSRC 2020 will introduce significant change to the 2023 submission, compared with 2018, and minimising other changes to the ERA process would help identify the effects and implications of these coding changes, while limiting the related increased complexity in preparing the submission.

Progress towards automated data collection in future rounds will be extremely welcome, as this will reduce the opportunity cost to universities of preparing ERA submissions.

The University of Sydney appreciates the ARC's acknowledgement of the COVID-19 pandemic and the impact it has had on research activities since early 2020. We support the temporary measure being implemented for ERA 2023 described in section 2.5 (*Response to the impact of the COVID-19 pandemic*), which recognises that the impact of the pandemic differs across disciplines and universities, and particularly welcome the opportunity to explain the impact of COVID-19 on the discipline in the explanatory statements.

Peer review sample representative set

Relaxation of the requirement that the 30% ERA peer review sample must be representative of the submitted research output types for each four-digit FoR (section 3.6, p13) is a welcome acknowledgement of the impact of the COVID-19 pandemic on different disciplines and categories of research output.

It would be helpful if the definitions associated with other requirements for selection of the 30% peer review sample were clearer. For instance, the guidelines should be explicit about what defines a "representative sample of the institution's eligible researchers for that four-digit FoR" for the peer-reviewed Units of Evaluation (p13).

The guidelines should explicitly state, in distinct sections, the data requirements for both the 30% peer review sample and for the remaining 70% of the submission from a peer review discipline. The guidelines as drafted outline the requirements for the peer review sample in relation to traditional outputs in section 4.4.7 (p27), and NTROs from section 4.4.9.1 (p33). They also state that all eligible outputs must be included in the full submission (p23, 4.4.1: "If research outputs are eligible, institutions must submit them"). While it is possible to infer from the guidelines as currently drafted what is *not* required for the remaining 70% of the submission from a peer review discipline, explicit clarification in the form of a sentence like "there is no requirement for the remaining 70% of the submission to include the following..." would be welcome.

Non-Traditional Research Outputs

The University recommends that the wording under section 4.4.9 on p32 (NTROs) is revised to "A portfolio contains items that alone **may** not represent research but combined demonstrate coherent research content" so that it is consistent with the definition of portfolio given in section 4.4.9.7. (Portfolio) on p36 "A portfolio is a collection of research outputs that institutions submit as a single NTRO. It is made up of research outputs from the same underlying research endeavour that on their own **may** not meet the definition of research, but when collected together have coherent research content".

Section 4.4.9.6 Research reports for an external body

The clarification provided by the addition of “*Portfolios are eligible for submission in this subcategory only within FoRs flagged with ‘other NTRO’ (see the ERA 2023 Discipline Matrix)*” in this section of the guidelines (p35) is welcome. This addition is consistent with the draft Discipline Matrix and confirms that portfolios of CW5s would not be allowed in the full range of peer review codes. This is a helpful clarification of information that was previously contained in the Discipline Matrix.

Clarification regarding the Extent field

Inconsistencies exist between the Draft ERA 2023 Submission Guidelines and parts of the Draft ERA-SEER 2023 Technical Specifications as to whether ‘Extent’ is a mandatory or optional field for NTROs. In Appendix F5 (*Summary of data requirements for NTROs*) of the draft submission guidelines (p65), the field is listed as Optional. In section 3.3.7 (*Non-traditional research outputs*) of the draft SEER technical specifications the Extent field is shown as Mandatory in Figure 11 (*Non-Traditional Research Output Data Structure*) on p38, but as Optional in the associated table on p39. The same inconsistency occurs in section 3.3.8.6.2 (*Non-traditional research outputs within a portfolio*) of the draft SEER technical specifications between Figure 13 (*Non-Traditional Research Output Data Structure within a Portfolio*) on p50 and the associated table on p51.

NTRO weighting of major works

Non-Traditional Research Outputs (NTROs) are a significant and growing component of the research outputs of Australian universities. In the case of those NTROs other than Research Reports, their inclusion in the ERA arises out of a long process of formally recognising that creative practice-based research methods and forms can generate important new knowledge that contributes to scholarship across many fields of research.

It has been noted that, whereas for traditional research outputs, scholarly books have a weighting of 5:1 compared to other research outputs for the purpose of low volume threshold determination in recognition of the amount of work involved in preparation of a major scholarly monograph, no such distinction rises with NTROs. All original creative works, regardless of scale and significance, are weighted at 1 point each. This includes portfolios of creative works, which can constitute major retrospectives of an artist’s ongoing work.

The case has been made that this is grossly inequitable for creative practitioners, as it rests on the assumption that a novel involves less work, or makes less of a scholarly contribution, than a non-fiction work, or that a documentary film is not the product of equivalent work to a scholarly monograph. This would suggest an interpretive bias in the definition of what constitutes ‘research’ that works to the disadvantage of the many creative practitioners working in Australian universities, and arguably distorts the outcomes for those disciplines in the ERA.

The University of Sydney notes that one issue is the heterogeneity of outputs that come within the category of NTROs, and the difficulties that this can present in generating comparative weightings, particularly across different art forms and design practices. The University recommends further discussion as to what would be deemed to constitute a ‘major work’ in the creative practice disciplines, which could form the basis for a reconsideration of these weightings.

Indigenous research related elements of the Draft Guidelines

Section 4.4.3.2 Apportionment (reassignment exception 4.4.3.1)

The University recommends removal of the 50% reassignment exception for 45 Indigenous Studies four-digit codes. The purpose of introducing the new 45 Indigenous Studies codes was to improve the visibility of Indigenous research. Introducing a 50% reassignment requirement, while a lower threshold than for other FoR codes, does not support this aim. Analysis of publication data across Australian universities, and within the University of Sydney, has found that publications with Indigenous Studies content are spread across a broad set of journals that are not considered to be predominantly Indigenous Studies outlets, and therefore may not be coded to an Indigenous Studies FoR code. The threshold of 50% Indigenous research content will be considered too high in many cases to warrant coding an output to the appropriate Indigenous Studies code, which will adversely impact on an institution’s ability to meet the low volume threshold in that Unit of Evaluation. We recommend removal

of the reassignment exception rule to achieve improved visibility of Indigenous research in ERA 2023. This removal should be reflected too in the relevant Business Rules (BR059, BR113).

Section 2.3 Data collection - Sensitivity flag

The wording of attribute numbers 2 and 3 to describe the presence of sensitivities relating to women's and men's business is too broad and would be difficult to implement in practice. Moreover, these attributes as drafted do not correspond with current practice around sensitivities in Indigenous communities. The following wording, corresponding to common use of sensitivities, is suggested instead:

2. Indigenous/First Nations people should be aware that this output is about **secret sacred** women's business.
3. Indigenous/First Nations people should be aware that this output is about **secret sacred** men's business.

Appendix D – Notes relating to the contents of research statements for NTROs selected for peer review in Indigenous Studies.

Following consultation with Indigenous researchers at our university during 2020 and 2021, the University of Sydney has formulated requirements for research contribution and research significance relating to NTROs resulting from Indigenous research:

- Innovation from an Indigenous perspective has been interpreted to mean that Indigenous research is embedded in Indigenous ways of knowing, being and doing, which come in many forms and often differ from western research approaches.
- Indigenous research is governed by community protocols. It is commonly co-created with Indigenous individuals and/or their communities and outcomes may be disseminated locally through embodied forms and practices that are negotiated between the researcher and communities. This is because Indigenous research is driven by a desire to benefit community and the well-being of participants. We recognise that this kind of NTRO, which, on the surface, might appear to be of solely local significance, is actually contributing to national and global cultural development and knowledge production.
- Community recognition is an important form of peer recognition and research excellence applicable to NTROs resulting from Indigenous research. These NTROs are commonly co-created in response to community-identified needs. Community recognition and responding to community-identified needs should be explicitly recognised as evidence of excellence.
- Even when these NTROs are disseminated locally, resulting in benefits and significance for specific communities, we recognise that they also have the capacity to contribute to national and global knowledge and culture, i.e. they can have significance or value beyond a specific community.

Under the **Research contribution** heading (Innovation sub-heading), instead of the current proposed note, the following wording is suggested:

*“Note – for Indigenous studies consider how innovation is **generated from Indigenous ways of knowing, being and doing, which may include co-creation of knowledge through embodied forms and practices**”*

Under the **Research significance** heading, instead of the current proposed wording, the following wording is suggested:

“Note – for Indigenous studies consider to what extent the research output:

- ***was co-created in response to community-identified needs***
- ***resulted from authentic engagement on a research question that Indigenous people want investigated***
- ***provided communities with solutions to their concerns or otherwise benefitted the community or participants***”