

Stakeholder Feedback November 2015

PBRF SRG Consultation Paper #9 - Review of the TEO Audit process

The information below is a summary of the Performance-Based Research Fund (PBRF) Sector Reference Group's (SRG's) ninth consultation paper on the review of the TEO Audit process.

Where the organisation is not identified in the comment, the TEC has not attributed those comments to any organisation. Each line of commentary denotes a separate response from an organisation or individual.

Number	Organisation name
1	Auckland University of Technology
2	Christchurch Polytechnic Institute of Technology
3	Eastern Institute of Technology
4	Individual
5	Lincoln University
6	Massey University
7	Otago Polytechnic
8	Tertiary Education Union Te Hautū Kahurangi o Aotearoa
9	University of Auckland
10	University of Canterbury
11	University of Otago
12	University of Waikato
13	Victoria University of Wellington

Review of the TEO Audit process

A. Should the 2018 Quality Evaluation audit process follow similar timing as the 2012 Quality Evaluation?

Answer Options	Response Percent	Response Count
Yes	92.3%	12
No	7.7%	1

Comments

Audit Questionnaire – This questionnaire was completed in May 2011 with only 10 working days. This timeframe was extremely tight considering the amount of information required. I would suggest that the Questionnaire is available to TEOs from early May and returned to TEC on 22 June 2017 – five working days after the 2017 staff census begins.

Process Assurance Audit – no issues

CEO Declaration – Page 7. For 2012 the CEO declaration was two weeks after the final submission date. The suggested 24 hours is too tight and does not include the five working days TEOs have to check the uploaded portfolios in the TEC Portal. If the final submission day is 6th July then the CEO declaration should be returned to TEC on Monday 16th July.

Data Evaluation Audit – no issues.

We are happy with using a similar timing for the next round. However it was felt that the preparedness audit data was possibly requested too early in the period. Some of the data submitted by TEOs were not consistent and thus misinterpreted which caused some concern.

Yes, in general we support the timing of the quality evaluation audit.

For our TEO we found the 2011 Process Assurance audit not particularly useful, it appeared to be as much a training and exploration exercise for the auditors as an examination of preparedness of our TEO. However we support continuation of the preliminary Process Assurance audit and recognise the auditors do need to become familiar with TEOs and their processes.

It worked well in 2012

This seems to provide sufficient time for identifying areas or concerns that can then be addressed before the Quality Evaluation itself begins.

B. Are there any other aspects of the Quality Evaluation that should be included in the TEO audit process?

Answer Options	Response Percent	Response Count
Yes	33.3%	4
No	66.7%	8

Comments

Academic staff contract changes in the 12 months prior to the census date? i.e. changes which have the effect of including or excluding academic staff from the census.

Waikato recommends Ministry of Education-sourced data used in PBRF Average Quality Score denominators also be included in the TEC's audit.

Waikato recommends the TEC continue to work closely with Symplectic, the provider of the PBRF software for currently six of the 8 NZ universities. It could be appropriate to extend the TEC's process assurance audit to include Symplectic's preparedness.

Yes, the following should be considered by the SRG for inclusion in the audit process:

1. Review the listed conflicts of interest by all peer review panel members, exploring possible unlisted conflicts.

2. The denominator for the new AQS is, we understand, to be derived from the annual staffing return. We believe this return should be subject to some form of audit given its importance in determining the PBRF AQS. We suggest the SRG raise this with the TEC and the Ministry given the importance of the denominator and the behaviour of some TEOs regarding staffing matters.

New and emerging staff evidence portfolios as these now have higher weighting.

Where papers are co-authored there should be some checking that the contributions are consistent.

Research Contribution should be verified using more sources in the data audit. It is where the impact of the research will be evaluated. TEO should have evidence of Research Contribution which can be verified, but not be required to submit the evidence.

The requirement to audit Research Contributions will have a significant overhead on TEOs as this information is not currently held centrally. Collecting information on research outputs has benefits outside the PBRF process (e.g. accuracy of data held on staff profile pages, annual reporting of output counts etc.), research contributions are used only for PBRF.

We wonder if there is any way that the 'gaming' behaviour in terms of moving staff to different roles, starting and finishing fixed term appointments and so forth could be addressed in the audit. It would be particularly interesting to see if there are trends from one audit to another.

C. Are the broad categories of 'fundamental' and 'serious' errors appropriate?

Answer Options	Response Percent	Response Count
Yes	90.0%	9
No	10.0%	1

Comments

(Fundamental errors section): Clarification on where advance online publications stand at either end of the assessment period. For example, advance online publication available publicly in 2017, but the final print version is not published until 2018 – is this to be included? If so, this contradicts the bullet point – “the final version of a research output being publically available outside the assessment period for the 2018 Quality Evaluation”. Clarification is needed here. We just need to make sure that by “final version” it is understood that this might be an advance online publication.

(Serious errors section): Need to ensure full classification inclusion and exclusions are given in guidelines – 2012 guidelines are vague in some areas on this.

Waikato considers the term 'similar content' (pg 9) to be very broad and further elaboration would be helpful. For example some early career researchers research outputs have similar content. Are these to be excluded from an evidence portfolio? How similar is similar?

This could possibly be addressed by changing

“a research output with similar content to other research outputs submitted in the EP;“ (pg 9)

To

“a research output with substantially the same results as another, without having any additional research importance” (pg 9)

Yes, in we support broad categories of 'fundamental' and 'serious' errors.
 More clarity needs to be provide for Fundamental errors of the following types:

1. the final version of a research output being publicly available outside the assessment period for the 2018 Quality Evaluation;
 Issue: the term 'final version' is ambiguous and contentious.
 Suggestion: Definition of 'final version publicly available' requires clarification.

2. a research output with similar content to other research outputs submitted in the EP;
 Issue: This error is inconsistent with advice provided in the 2012 PBRF Guidelines. The 'guidance' given on page 53 states that "When selecting their NROs, staff members should not include outputs that are identical, or virtually identical, in nature and content to other NROs assessed in their PBRF evidence portfolios. This includes revised or modified versions of outputs that were submitted in previous Quality Evaluations and republished in the current assessment period. Staff members may include outputs to which there have been minor changes in their list of 'other' research outputs, although the general criterion of selecting their best work still applies. If such an output is selected for inclusion, the Description field of the output should note that it is a modified version of another output."
 Suggestion: That such items are re-categorised as 'serious' rather than fundamental. Moreover panel members should be able to pick up that near identical NROs through reading the evidence provided. Some guidance on how staff who submit a theses where the following publications are clearly derived would be useful.

More clarity needs to be provide for Serious errors of the following types:

1. identification of research outputs as quality assured when they are not;
 Issue: Raised in another consultation paper the definition of 'quality assured' is sometimes a relative term and can be interpreted differently by various disciplines. For 2012, the only output type that required to have evidence of having been 'quality assured' was a report. To implement this error category there will need to be full specification for what qualifies, or is required as evidence for, quality assurance for every research output category across all disciplines (there are different standards across the disciplines). TEOs currently do not document the quality assurance process, or retain evidence of such a process, for each of the research outputs recorded. To do so at this stage of the PBRF publication period (year four of the six year publication period) would be a significant burden on TEOs.
 While it is unlikely this item is an issue of significance, it nonetheless does require full consideration.

2. failure to include the names and/or contributions of co-authors;
 Issue: This error is ambiguous in suggesting that the 'contributions' of co-authors must be included. This is not a requirement from the 2012 Guidelines. We assume the statement was meant to mean failure to list all 'contributors' to the item (i.e. artist, author, designer etc.).
 Suggestion: Clarify error statement to "failure to include the names of all the contributors of a research output (as determined by the published version of the item)". We do not agree that the contributions of all contributors/authors needs to be explained in the 'My Contribution' section.

For the Research Outputs component, they are appropriate, clear and understood. However, the category of "fundamental" errors should not apply to the Research Contribution component; at most, errors in this component should be "serious" (for example, having no evidence to confirm the Research Contribution activity is existent). This is because errors in this component will be difficult to audit. It may already be too late to save robust evidence of some Research Contribution activities, given the assessment period is already well underway.

Yes, although we wish to query the classification & consequences for two of the fundamental errors. We are not sure how "a research output with similar content to other research outputs submitted in the EP" can be viewed as an audit related problem, this may be ill advised but does not actually represent an error as such? Certainly it should not "render staff ineligible to participate in the Quality Evaluation, and research outputs or contributions ineligible for assessment." We think that where an output "doesn't meet the definition of research" should be considered as a serious error rather than a fundamental error, as long as it only occurs once in an EP

D. Are there any other changes to the process for managing errors that need to be considered?

Answer Options	Response Percent	Response Count
Yes	38.5%	5
No	61.5%	8

Comments

During the 2012 round we had problems with staff being overseas when the audit requests came in and support staff could not complete the inquiry until the staff member returned. It is possible to request for a brief extension with the auditors if the circumstances were of a genuine nature.

Waikato recommends the TEC refrain from making last minute blanket changes in the 2018 PBRF round
 Waikato would support any future sanctions being targeted to the specific TEO(s) causing concern

TEOs should demonstrate how there systems avoid errors. The tolerable level for errors needs to be identified. If new and remerging staff don't meet criteria it should be a fundamental error, as it has higher weighting now. If a research output that doesn't meet the definition of research is a fundamental error, there needs to be more information in the Panel Guidelines. In some areas e.g. creativity it could be a matter of opinion. Similarly if the overlap of content is a fundamental error, there needs to be guidelines on how to present items of similar content e.g. exhibitions in different countries/venues could be different outputs – how much is acceptable.
 Misrepresentation of research contribution is a serious error, but it is not really proposed to audit research contributions apart from TEO reports and grants.

Application of sanctions needs to be appropriate to the weighting of the elements within the portfolio.

Overall consideration needs to be given to the extent of errors in EPs, even for those classified as fundamental errors. If an error pertains to a single output then the consequences should be less indicating that this was a simple mistake rather than an intent to deceive.

E. Are there other sanctions that need to be considered? For example, not reporting the average quality scores for TEOs where there have been systemic errors identified.

Answer Options	Response Percent	Response Count
Yes	30.0%	3
No	70.0%	7

Comments

Perhaps a one-off fine against the first revenue year of the 2018 Quality Evaluation round.

More explicit information on the sanctions for systemic errors would be useful.

Reporting of error rates as in the current system is a strong incentive against error

Yes, we support the proposal of more substantive sanctions being applied than what has been in applied in the past. In particular when systematic or orchestrated manipulation of information or false information is submitted. We recognise the Guidelines do allow for the extreme case of “possible exclusion of all EPs submitted ...” however believe sanctions for instances where false information is provided be detailed in the audit Guidelines, specifically a threshold for when sanctions would be applied. For example, rather than just ‘removing’ a staff member who was listed as eligible when the staff member was known to be not eligible, the TEO should have some substantive penalty applied such as having two eligible staff also excluded, in addition to public notification of the action. The current ‘sanction’ regime, in our view, fails to adequately address systematic or considered manipulation of data as evidenced in 2012 with the late change to the AQS calculation due to TEO staffing ‘changes’.

There are no other sanctions that need to be considered. The example given would not be considered a sanction by most TEOs.

If the errors can be shown to prove that the institution is engaging in deliberate ‘gaming’ then yes, they should be sanctioned, and the behaviour widely publicised – it is this kind of behaviour after all that brings the process into disrepute and jeopardises the sector’s international and national research standing.

Please describe and detail any areas or issues relating to the review of the TEO Audit process that require our attention but have not already been included in the consultation paper.

We would like more guidance on who should prepare and submit an evidence portfolio. The 2012 Guidelines were vague on the subject. How many outputs would be considered the ‘minimal’ amount of evidence of research activity and which publication categories are considered as having ‘limited or no significance/impact’?

In the 2012 round ‘Serious’ errors were attributed to TEOs in the categorisation of New & Emerging, based upon decisions made by TEC/PBRF after portfolios has been submitted. We are referring to the decision to not accept staff in the creative arts in their first academic appointment as N&E if they had been professional artists prior to the start of the round. We do not disagree with that decision, but only with the subsequent published claim by the auditors that our TEO had made ‘Serious’ errors.

One issue: when we provide preliminary data to help in preparing for 2018, it would be good to have opportunities to address any issues with the data before it is published in reports.

•Page 8 (1st paragraph): NROs electronically accessible – what formats and are multiple files per NRO allowed?
Accessibility via doi, and or pdf?

Transparency of decisions made, and interpretations of the PBRF Guidelines. On more than one occasion universities have requested there be an open forum of questions and responses to queries regarding PBRF related issues, something akin to how questions and responses to public tenders are managed. The lack of a transparent information forum we believe resulted in inconsistent information provision to TEOs, particularly on detailed eligibility and other ambiguous issues. We strongly suggest the SRG encourage the TEC to have ‘query and response’ area, formally logging queries and responses that is available to all participating TEOs to ensure there is a transparent and equitable exchange of information.

TEO declaration (p. 7)

The following TEO confirmation point should be deleted: “the TEO has appropriately applied the PBRF Guidelines to ensure no EP likely to receive a funded Quality Category been excluded from assessment in the Quality Evaluation”.

This is because it is inconsistent with the point that “The staff eligibility audit will only be on those staff submitting EPs.” If the confirmation point is not deleted then, at best, a definition of “likely to receive...” would have to be agreed upon and its application audited for consistency across TEOs. This would seem to achieve very little.

Research Contributions (p. 8)

TEO research reports and annual reports are unlikely to be useful as audit tools, as they rarely record individuals’ activities at the level of detail required, if they exist at all. It is inevitable that auditors will have to request evidence from individual researchers themselves. Therefore, it will be necessary to issue clear guidelines on the nature of evidence and record keeping required. Given that we are already halfway through the assessment period, this is a matter of some urgency.

Serious Errors (p. 9)

The list of serious errors includes an anomaly; the EPs no longer record FTEs.

In regard to the statement that “The TEC expects TEOs to establish internal procedures that will ensure EPs submitted to the 2018 Quality Evaluation do not contain these kinds of errors”, the University agrees that robust internal procedures are vital. However, even with the most watertight procedures in the world, it is not possible to guarantee a 100% error-free submission, and this would be an unreasonable expectation.

Process for Managing Errors (p. 10)

A process is briefly described for managing errors found in advance of the panel meetings, but a clear process is also needed, and should be made public well in advance, for those errors discovered during or after the panel meetings.

Evidence requested by auditors

We seek assurance that no auditor requests for evidence will compromise the ability of TEOs to comply with the Privacy Act. There are limits and restrictions on the types of personal information about staff members that TEOs can legally release to third parties, and this needs to be acknowledged by the auditors. TEOs should not be sanctioned for refusing requests that require non-compliance with any law.

As the inclusion of outputs with similar content is considered a fundamental error, it would be useful to have guidelines regarding how ‘similar content’ is interpreted.

We noted our concern about ‘gaming’ of the system, and hope that there is room in the audit process to be able to address this directly.