Stakeholder Feedback March 2016

PBRF SRG Consultation Paper #11 - Review of the assessment framework (Part 2: further changes to the framework); and updates to the 'new and emerging' researcher criteria

The information below is a summary of the Performance-Based Research Fund (PBRF) Sector Reference Group's (SRG's) eleventh consultation paper on the assessment framework, including applied research and review of the new and emerging researcher criteria.
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	CPIT Aoraki
3	Eastern Institute of Technology
4	Individual
5	Individual
6	Individual
7	Individual
8	Massey University
9	Otago Polytechnic
10	Tertiary Education Union Te Hautū Kahurangi o Aotearoa
11	Unitec Institute of Technology
12	University of Auckland
13	University of Canterbury
14	University of Otago
15	University of Otago - Division of Health Sciences
16	University of Waikato
17	Victoria University of Wellington

Do you support the proposed changes to the Guidelines for Special Input Requirements: Maori Research?

Answer Options	Response Percent	Response Count
Yes	87.5%	14
No	0.0%	0
Partially	12.5%	2

Additional comments

Yes, but note the change of language from ‘Māori world-views (both traditional and contemporary) and Māori methods of research’ in the first paragraph to a more generalised criteria for applying to the MKD panel in the 5th to 7th paragraphs.
‘Research involving Māori, or specifically relevant to Māori.’
‘address an issue of importance for Māori‘
‘able to contribute to the understanding of issues affecting Māori‘
‘or uptake may provide an opportunity to increase the understanding of issues affecting Māori’
Under such generalised criteria most New Zealand researchers could apply to the MKD panel for assessment.

Yes these seem sensible and likely to give panels the information they need

Yes. However the previous consultation documents would imply that if we cross-refer a portfolio to the MKD panel it would be assessed by that panel. However it would appear the Panel Chair can override this if necessary.

We support the proposed changes. We also suggest the MKD Panel guidelines further clarify the approximate threshold for a valid cross-referral to the MKD Panel (for example, if a portfolio has three Other Research Outputs and two Research Contributions that contain research, or research activity, relevant to Māori would this a valid cross-referred to the MKD Panel?). This information would help TEOs reduce unnecessary cross-referral requests. Some examples that help illustrate the below threshold and above threshold points would be appreciated.

Support changes.

The University of Waikato supports the proposed changes designed to assist TEOs determine whether an EP may be cross- referred to the Māori Knowledge and Development Panel (MKD) when the primary panel is not MKD.
However there appears to be a discrepancy on page 3, in the Section 18 textbox.
The first paragraph refers to the MKD panel normally assessing an EP "…. where there is evidence of research based on Māori world-views (both traditional and contemporary) and Māori methods of research."
However further down in the same textbox it says
"The MKD panel would expect that EPs completing the Māori Research element in the EP would contain research involving Māori, or specifically relevant to Māori."

Does this mean research involving, but not specifically targeting, Māori is eligible for referral to the MKD panel. e.g. would generic research on sleeping arrangements of infants, which included Māori among the participants, be eligible for cross-referral?

As long as the primary panel
If the primary panel has a higher weighting eg science and has relevance for Māori will the primary panel ranking be provided?

The changes seem sensible. The cover both researchers who have identified their EP for the MKD panel, and those where this is not specified but outputs have evidence of relevance to Māori knowledge and development. This ensures that every opportunity is afforded to researchers to have their work comprehensively assessed.

Clarify the distinction between the evidence portfolio belonging in the Maori Knowledge and Development Panel (MKD) and being cross referenced. It appears that submission to MKD is for Maori world views or Maori methods of research, and cross reference to MDK is for issues affecting Maori. Is that correct?
Clarify that the 5 research outputs must be at least one NRO and include other research outputs or nominated research outputs. If it's more than 5 is it supposed to be submitted to MDK?

Yes, we support the proposed changes (ie the removal of references to Māori specialist advisers) to the Guidelines for Special Input Requirements: Māori Research.
However, we would also like to register our concern that the Chair of the Māori Knowledge and Development panel does not have the capacity to refer to external expertise, apart from cross-referring to other panels. It is highly unlikely that the MKD panel expertise will include all necessary matauranga Māori to cover all MKD research. We recommend that the MKD chair is given the capacity, in exceptional circumstances, to request permission from TEC to seek external matauranga Māori advice when the specific matauranga Māori expertise required to assess one or more NROs in an EP is not included in the MKD panel.

In general we support the changes to evaluating Māori research.
However, description of the Māori Research element in the EP appears to offer the opportunity for staff members to introduce reference to an additional 5 works, beyond the 4 NROs and 8 ROs. As it would be expected that Panel Members would examine these works, this seems to give staff members who nominate MKD assessment an advantage over those who do not, through the ability to effectively nominate 17 ROs rather than 12.

What is not clear is if the research that is classed as Maori Research should be carried out by Maori or anyone. I personally feel that there should be clear evidence of iwi-affiliation for this category.

Do you support the proposed changes to the definition of 'world-class'?

Answer Options	Response Percent	Response Count
Yes	76.5%	13
No	0.0%	0
Partially	23.5%	4

Additional comments

Yes. One suggestion -
Research contributions that reflect the esteem of peers considered to be global experts in their field, or show how the staff member contributes to a world leading research environment, could be considered 'world-class'.

Yes we think these are much clearer than before. Very welcome improvement.

Yes these guidelines make the meaning much clearer.

Yes we support the proposed definition.

There is a feeling amongst researchers that New Zealand specific research that is published in New Zealand journals is not currently considered by panels to be of world-class standard, even if that is the most appropriate place to publish it for the audience that is being addressed. We are unsure how the current wording will address this issue.
"World class research outputs are those outputs which rank with the best within its broader discipline, regardless of the topic, theme or location" Does the word "location" here refer to where it is published? If so then this should be stated more plainly.

The University of Waikato supports the SRG's proposed changes to the definition of world class.
The University of Waikato was pleased to note the revised definition of 'world-class' specifically mentioning research of a local, regional or national focus or interest.

We are pleased to see much greater clarification, particularly as the term relates to local, regional and Māori and Pacific themes. It is important that the sector is clear that the term refers to a standard, not a type or focus of research. We believe the new description does this.

The definition for ‘world-class’ needs to make specific reference to the definition excluding medium of publication, and instead focusing on the quality of research. There is still the implication that even if the themes of the research are NZ in nature, they should still be on the international stage, published in international mediums. Local publication of world-class research may be the most impactful medium, but this may impact its visibility globally. For example:
“The use of ‘world-class’ in relation to the RO and RC component scoring descriptors denotes a standard, not a type or focus of research. ‘World-class’ refers to the quality of the research, and research can be considered world-class regardless of the medium or location of publication.”

Yes

There is a feeling amongst researchers that New Zealand specific research that is published in New Zealand journals is not currently considered by panels to be of world-class standard, even if that is the most appropriate place to publish it for the audience that is being addressed. We are unsure how the current wording will address this issue.
“World class research outputs are those outputs which rank with the best within its broader discipline, regardless of the topic, theme or location” Does the word “location” here refer to where it is published? If so then this should be stated more plainly.

The proposed wording makes it clear that the term refers to a research standard rather than a research focus, but it does not adequately define the criteria to meet that standard. For example, the criteria for “rank[ing] with the best research” or for being “a world-leading research environment” are missing. This is amplified by the tie-point descriptors which use terms such as “world-class peer recognition” and “world-class research environment” with no further definition.
We suggest:
•Including examples of what makes research “world-class”, such as the development of new paradigms, methodologies or theories that are applicable in other research milieus; major discoveries; and international resonance and recognition from international peers.
•Including the advice that research that focusses on international topics and themes must also rank with the best research of its discipline conducted anywhere in the world in order to be considered of world-class standard. Ie, that although “Research outputs that deal with topics or themes of primarily local, regional or national focus or interest can be of world-class standard”, it is not necessarily the case that outputs that deal with topics of themes of international focus are of world-class standard.

Do you support the proposed descriptors for the Research Contribution component?

Answer Options	Response Percent	Response Count
Yes	56.3%	9
No	0.0%	0
Partially	43.8%	7

Additional comments

Unsure the 2018 Guidelines should continue to reinforce the old PE and CRE terms, especially around scoring the new Research Contribution categories.

We support combining both peer esteem and contribution to the research environment into one category, Research Contribution.
We also support the recommendation that in order to obtain a high score for this category, strong and consistent evidence of both peer esteem and contributions to the research environment would be expected.
We also support the inclusion of instances of community/end-user impact as part of this component.

Yes. In particular we approve of the requirement for both peer esteem and contributions to the research environment to achieve a higher score in the research contribution component.

We commend the SRG on the great work done in merging the historical descriptors in with the new Research Contribution descriptors.
We question whether the term ‘consistently’ should be introduced into the tie-point descriptors and suggest considering that that ‘consistent’ would be a term more appropriately applied to scores higher than the tie-point. For example, a staff member who consistently attracts world class recognition for their research presumably would score a seven rather than a six? The 2012 Guidelines only applied the term ‘consistent’ to activities such as citations and student supervision where a consistent record is relatively normal.
We support the statement that higher scores should have a ‘balance’ of Peer Esteem (PE) and Contributions to the Research Environment (CRE) items in the EP (paragraph 25). There is concern there may be confusion with how ‘balance’ might be interpreted (for assessment) or would look like (for staff completing EPs) given the historical issues with PE and CRE categorisation. To address this we suggest the Guidelines be explicit on which activities will be considered Peer Esteem, Contribution to Research, Outreach or Impact, this being a prerequisite for consistent scoring of the Research Contribution section across all Panels. Much of the categorisation work has already been completed (see Appendix 3 in the Consultation Paper #3 Developing Evidence Portfolios – operational guidance for the Research Contribution component) but we assume ambiguity remains given some the PE and CRE items have been merged.

1.The University of Waikato notes that the Research Contributions in Appendix 2 categorizes the new Research Contribution components in terms of the old Peer Esteem and Contribution to the Research Environment.

2. The University of Waikato supports the SRG's recommendation that
"…higher scores should only be awarded for Research Contribution when the researcher's range of contributions includes both high peer esteem and high contribution to the research environment, not just one or the other."
This is a very important scoring criteria and must be easily understood by researchers when deciding which Research Contribution (RC) components to select for their 2018 evidence portfolio.
Currently the RC components are listed alphabetically.
To ensure there is minimal confusion for a researcher when selecting the appropriate mix of RC entries to include in their portfolio, Waikato strongly recommends that within the 2018 PBRF Guidelines the Research Contribution components be grouped by esteem, contribution and then impact i.e. group the components, rather than simply listing them alphabetically.
This would also be consistent with the esteem, contribution and impact order the RC components are referenced in the proposed 'RC component tie-point descriptors' on page 19 of the consultation document.

3. Waikato seeks clarification over awarding of scores where a researcher has had significant impact outside of academia, and has high peer esteem, but does not necessarily have high contribution to the research environment i.e. does impact hold a lower scoring value than peer esteem and contribution to the research environment.

4. As each score for the RC Component is now worth 30 points, consistent evaluation of this component is going to be influential in the quality grades for individuals.
From the prior PBRF rounds, it is well known that many academic staff received different scores for their PE and CRE components.
Hence, we are concerned at how the review process will handle 'uneven' portfolios.
The RC Component Descriptors make it clear that "to obtain high scores, strong and consistent evidence of both peer esteem and contributions to the research environment would normally expected".
Given that the PE and CRE items have been reorganised and combined into the new RC categories – how will PE and CRE be identified to the reviewers? (NB this links to our comments above on the need to reorder and number the RCs in such a way that the 3 types of RC are clear)
How will this work in practice? For example, for a senior staff member who has accumulated peer esteem, but is no longer contributing to the research environment; or a more junior staff member who is contributing to the research environment, but has not very much peer esteem.
The RC Component tie point descriptors provide examples of what can be considered as examples of PE, CRE and Impact for the 3 major tie points. But these are equivalent levels of achievement for each tie point. What will reviewers do with the examples mentioned above? Given that there are no half marks allocated, will they receive the score for their lower performance level? Or the higher performance level?
What impact will this have on the overall scores for the portfolio?
Given that staff will have to decide what items to report for their RC – what if they only report a small number of significant international activities and do not mention the rest of their less significant but nevertheless very important national and local contributions to the research environment.
This links to the issue of how many world class activities are needed to obtain the higher scores. Should staff be encouraged to report all of their activities (if the space allows) or to use a smaller set that makes them look more important world-class or international?
These matters are important as they will influence staff behaviour. It is important for academic staff to contribute within their own institution, local regional and national activities. Hence we need to create expectations that will motivate staff to remain active in these areas, as well as their more prestigious international and world-class activities.

It is important that the research contribution component takes both peer esteem and contribution to the research environment items into account. However, there is concern that the stated requirement to have high peer esteem and contribution to the research environment examples to achieve an A quality category may limit the ability of some researchers to rightly achieve an A quality category. Will the holistic assessment be able to counter this? For example, where an academic has extraordinary examples of peer esteem combined with good (but not great) examples of contribution to the research environment, will the descriptors and holistic assessment allow the portfolio to be assigned an A quality category?
Some phrases used in the descriptor for an A quality category reflects a bias toward certain kinds of study/research. For example, "undertaking editorship positions or membership of editorial panels or refereeing of top-ranked journals" implies an international bias which may not be appropriate for disciplines that are New Zealand focussed. In disciplines such as Law, the top-ranked journals are international journals, but many academics practicing field of New Zealand law would be disadvantaged as compared to those researching academic theory or international law.

We would suggest that some short examples are provided such as in the outreach and engagement bullet point, reference to use/acknowledgement by community groups.

p18 Recognition of the impact of research is not equally weighted with Peer Esteem and Contribution to Research Environment, as it is necessary to score well in Peer Esteem and Contribution to Research Environment AND MAY include impact. It should be 2 of the 3 components, as time will be spent to making the research have impact. As proposed, it is not consistent with the requirement better recognise and reward applied research.
“More efficient assessment processes will be accompanied by improved operational guidance to better recognise and reward applied research. (Office of the Minister for Tertiary Education, Skills and Employment, Cabinet Social Policy Committee, Improving the efficiency and effectiveness of the performance-based research fund, 2013, p.8)
Research funding and support which provides an indicator of the contribution the staff member makes to the research environment or reflect the staff member’s esteem where the funding/support is competitive
Funding reflects a staff member’s track record not peer esteem. It could be peer esteem if the staff member was commissioned to do work without it going to tender.
In-kind funding needs to be specifically included as it is evidence of strong connectivity with industry/stakeholders.
In the 2012 guidelines the descriptors stated that the level of income was not taken into account.
The final descriptor for impact (p18) should include information from the Professional and Applied Research (PAR) criteria on economic benefit, professional practice benefits, social and health benefits. The wording could be more specific and reflect the PAR criteria e.g.
Uptake and impact through applied research which may include new or improvements to some of the following : a) existing processes, products, services which benefit commerce; b) policy, strategy, planning, design, management, maintenance, monitoring, tools, community engagement which benefit the environment; c) professional practice; d) policy, practice, new insights and active dissemination which provides societal, cultural and health benefits.
It should be a requirement that each panel should give specific examples of uptake and impact.
Appendix 2 Scores and Tie Points
There is a new requirement for a strong and consistent record in all aspects of both Peer Esteem and Contribution to the Research Environment. This is a significant change from last round where the specific requirements for a consistent history were only for
•student supervision under Contribution to Research Environment (score 6)
•citations or reviews under Peer Esteem (score 4 and upwards).
This heavily disadvantages those with less time available for research activities, or who are not supervising research students, as occurs in polytechnics . Staff may have strong evidence, but not consistently over the entire six years, especially for part timers, people employed for less than the 6 years and applied researchers. A one year project for the World Health Organisation would be expected to be strong evidence of Peer Esteem, but such commissions are unlikely to be consistent throughout a six year period.
To ensure staff are rewarded for applied research for end-users/stakeholders :
•Peers outside academia should be defined and included.
•End users and stakeholders should have the same weight as academic peers.
•Income should include in-kind income as it is particularly strong evidence of end user or stakeholder engagement and is already a part of external grant applications.
The descriptions for benefit and impact refer to “research community, business or industry”. The criteria developed for the Professional and Applied Research Group were to be incorporated into the scoring for this component and therefore the descriptors need to explicitly include the benefit to the environment, professional practice, culture and society, including health “through new technology …. tools, policy, improved practice, markets, quality, employment, and reduced adverse effects on health, environment e.g. evidence that keeping cows out of water ways benefits the environment through improved water quality but not industry; research on reducing advertising during children’s TV programming is likely to benefit children but not the industry that advertises.
Leadership was stressed in the previous guidelines but not in these.
Some activities are given as a part of a list and some as a new sentence. The items which are a new sentence could be interpreted as having higher weighting and/or being a requirement
E.g.
1) Demonstrating that graduate students moving into research scholarships or postdoctoral fellowships or junior lectureships in departments …….. This now appears to be a requirement.
2) and/or doctoral examinations when everything else is a list.
Commissioning of reports should be included as in the previous guidelines.

For the most part we agree with the descriptors for the Research Contribution Component. Some of the descriptors overlap, however specific examples provided in the full guidelines will provide guidance regarding this.
However, we have concerns with this final statement:
“To obtain high scores, strong and consistent evidence of both peer esteem and contributions to the research environment would normally be expected. However, it is not expected that all staff members will have or include, examples of community/end-user impact.”
The combining of peer esteem and contribution sections, as well as the introduction of the impact measure, we done to streamline the portfolio, remove instances of overlap and contribute to the ability of researchers to include more applied research (and the impact) in their portfolios. However the statement above clearly favours Peer Esteem and Contribution measures over impact, thus discouraging, and possibly hindering, those whose primary area of research is applied, and therefore their evidence of Research Contribution may fall heavily towards research impact.
High scores should result from demonstrating the strongest examples of Research Contribution, regardless of which type they are categorised into. Because one component is missing in a portfolio it should not be assumed by the panel that this individual is not contributing significantly in that area. It may not have been included due to the limited size of the portfolio, and the researchers desire to include their strongest examples. The advice and descriptors need to be written in such a way as to suggest a variety of strong examples is required, regardless of which category they come from. Equal weight should be given to all three categories. If a researcher has significant contributions in the peer esteem and impact areas, but no examples for contribution to the research environment, then under the current tie point descriptions they could not achieve the anything above a 1, as the descriptors require peer esteem AND contribution to the research environment, and/or impact.
We suggest the descriptor should read:
“The EP would be expected to demonstrate that the staff member’s research has consistently attracted world-class recognition and the esteem of peers considered the experts in their field through the period; and/or that they can demonstrate a strong contribution to a world-class research environment in New Zealand and/or internationally, inside and/or outside of traditional academia; and/or they may have evidence that their research and/or expertise has had a significant impact, influence or benefit on the wide community or end-users.”

These are very useful

We appreciate that the SRG has appropriately recognised that both Peer Esteem and Contribution to the Research Environment are important aspects of this component. A few queries remain outstanding:
1.There is a discrepancy regarding the use of “impact”: the RC component is said to describe “any impact that their research has had outside academia” (emphasis added) yet, an example activity that may be included in the component is: “Uptake and impact which provides an indication of the contribution the staff member’s research has had inside and/or outside of academia.” (emphasis added)
Does “impact” refer to impact both within and outside of the academy, or only that outside the academy?
It would be very useful for impact to be defined. The Cabinet Paper may be a good starting point for such a definition: “…evidence of research application, including impact on policy, professional practice, or business processes, products or services.” (also see Applied Research feedback below). This wording suggests that the Cabinet decision intended to refer to impact outside academia.
A query was also raised during internal University consultation on this submission about the status of research that has an impact within academia but outside the researcher’s own discipline - for example, basic research in one field is often taken up in applied research in other fields. The SRG may like to consider whether it is appropriate for these contributions to also be considered ‘impact’ for Research Contribution purposes.
2.A few more specific examples of activities would be useful. For example “being on the editorial board of a journal” could be added to the list starting “Reviewing, refereeing, judging, evaluating and examining…” and “custodian of major research equipment/facilities” could be added to “Contribution to research discipline and environment…”

I am concerned about the importance of research grants in this category. It is well known that some research requires little funding while others require a considerable amount of funding. Research outputs should weighted against the funding level achieved. There are many excellent researchers in NZ who have to get by on very small grants and yet output per dollar can often be higher than for this individuals who are continually winning large amounts of funding from several different sources.

Do you support the proposed guidance on the holistic assessment stage of the assessment process?

Answer Options	Response Percent	Response Count
Yes	47.1%	8
No	11.8%	2
Partially	41.2%	7

Additional comments

Yes, but consultation paper 11 doesn’t mention how the holistic score will affect the final quality category. Does it replace the calibrated quality score or does the panel review the calibrated and holistic score together before coming to a decision?
Should part time researchers also go the holistic stage as they can no longer use the Extra-ordinary circumstances? If not, the panel reviewers need to be aware that this is a part time staff member in the portfolio details.

Yes.

Yes but it should include reference to part time employment

Yes, however expecting a fractional appointment to be included in the Platform of Research component risks the information getting lost. This should be included in the Extra-ordinary circumstances component to for better visibility.

Fully support this change. We believe this approach is more efficient and transparent process than used previously.

Part-time employment
We acknowledge that many people who are employed on a part-time basis manage to produce a lot of research. This is not the case for all part-time staff and we do not think that this is a reason why their small FTE should not be taken into account. Not having any provision at all for part-time employment has implications for women returning to the workforce after maternity leave, which is difficult enough as it is for those in research careers. We strongly believe that FTE should be displayed somewhere on the EP and FTE <0.5FTE should be taken into account in the scoring system.

The University of Waikato supports the SRG’s proposed guidance on the holistic assessment stage of the assessment process.
With the removal of the employment arrangements from the extra-ordinary circumstances provision, these now need to be addressed through the holistic assessment process.
The University recommends there be a stated location where this information should be recorded to ensure panel members know where to look for this information. Part time employment impacts a researcher e.g. access to funding and quantity of research outputs and contributions. Panel members should be made aware of this when assessing the EP.

The criterion of “uncommon factors” should be made more explicit to make it clear that unusual circumstances outlined in the Platform of Research – Contextual Summary, such as part-time employment (amongst others), are included here and can trigger an holistic assessment. Many academics have expressed concern that part-time employment does not appear to be taken into account under the proposed guidelines (i.e. they are no longer included under extraordinary circumstances and do not appear to be included under the holistic assessment).

We are supportive of the Holistic Quality category guidelines overall. With regard to the exclusion of employment arrangements, we think this is one of the areas that are poorly understood by TEO management, including HR and line managements in schools and departments and so have some concerns at its exclusion. There seems to be a misperception at some TEOs that (for example) a part-time employee or an employee who has been on extended leave is required to produce the same amount of research outputs as a fulltime employee. We hope the reduction in required NROs will help with clarifying this as well as the work on guidelines for researchers the TEC is undertaking.

Yes holistic assessment could be particularly important for assessing the impact of applied research and the input of panel members with wider experience in applied research can provide a better assessment of the value of the research and research contribution. It is also important for Exceptional Circumstances owing to the Canterbury earthquakes.

Do you support the proposed guidance on the holistic assessment stage of the assessment process
In principal, however some more work needs to be done regarding the detail contained within the criteria.
For example; a low RO score but a high RC score – this will be need to qualified to ensure it is applied consistency. Is a low RO score 2, but a high RC score 4?
How will unusual or uncommon research outputs/and or research activities be identified? What is considered unusual? What is unusual to one panellist may not be unusual to another. Specific examples by panel should be given.
Any other comments
Terms like 'minor' and 'major' may be problematic in relation to impact. From whose perspective is this being assessed? An end user may consider this to be a major impact in relation to their small business, however when quantified it may appear minor. This needs to be taken into account when writing the guidelines and when assessing portfolios.

Part-time employment
We acknowledge that many people who are employed on a part-time basis manage to produce a lot of research. This is not the case for all part-time staff and we do not think that this is a reason why their small FTE should not be taken into account. Not having any provision at all for part-time employment has implications for women returning to the workforce after maternity leave, which is difficult enough as it is for those in research careers. We strongly believe that FTE should be displayed somewhere on the EP and FTE <0.5FTE should be taken into account in the scoring system.

We support the guidance as outlined, but with one concern: it is missing guidance on part-time employment, which has been taken out of extraordinary circumstances provision in favour of the holistic assessment process. (Section 35 of the consultation paper : "The SRG believes that where employment arrangements such as part-time employment have a direct impact on the quality and/or quantity of research these can be addressed through the holistic assessment process.") Some more guidance on how these issues are to be addressed would be very helpful.

I think the holistic assessment is critical. For example lab based biomedical research is very expensive. When human samples are needed it takes additional time to gather these. Outputs may not necessarily be indicative of research excellence or funding level. It is difficult to obtain research funding for basic biomedical research on rare disorders. This situation does not necessarily mean that research carried out is of poor quality because it does not attract research funding, or it takes longer to achieve outputs because of limited funding. It is simply because there is not enough research funding available and many excellent researchers miss out or take longer to achieve the required outputs. This situation would not be unique to biomedical research. A closer look needs to taken where a researcher is winning many research grants with an average output compared to a researcher with very little funding also with an average output. I am not sure that these factors can be taken into consideration with the rubrics used without the holistic assessment.

Any other comments

There is widespread concern that the limited application of extraordinary circumstances will negatively impact on the assessment of researchers who have not been employed full-time throughout the PBRF period.

No other comments

The overall process of the PBRF can have negative consequences for the good solid citizens of the NZ research academic community, who are every bit as talented and able as the apparent highflyers. While I can see the value of having the PBRF system for evaluation of research, it does not necessarily reward all researchers at the level appropriate to their true value or indeed potential.

What other aspects of the Quality Evaluation process need specific consideration and review in order to address concerns about the inclusion and assessment of applied research?

We think good progress has been made on the consideration of applied research.
Some researchers are in applied fields in which the majority or even all of their assessable output is in the form of reports or white papers, and these are often not quality assured. For some, there are real barriers to producing quality-assured outputs. The assessment guidelines should ensure that these people are not unduly disadvantaged in the quality evaluation.

We have some concerns with the expertise needed to evaluate applied research in some Panels which have a diverse range of disciplines, such as the Health Panel.

We appreciate the efforts to be more inclusive of Applied Research. However, there is still some way to go to achieve parity in the assessment of what is meant by 'applied research'. Consider, for example, the standard academic output: a research paper in a peer-reviewed journal. This is the well-recognized (and ubiquitous) assessment and immediately achieves endorsement against the standard PBRF assessment criteria. In contrast, applied research does not necessarily meet with the same level of merit. The consultation paper attempts to address this in a holistic way by drawing on the many possible contributors in order to draw a net around applied research. This is too loose, because 'holism' will struggle against 'precision' in an assessment process. Therefore, as we believe has been the case, holism becomes an after-thought, invoked when the precision assessment appears too low. This means it will tend only to capture renowned individuals, i.e., those known to panelists, who have apparently scored too low against the standard criteria. We need a system, which assesses 'applied' and 'non-applied' research with parity that, at the outset, is independent of individual and discipline.
The proposed PBRF panel framework also does not have parity. Having applied researchers on panels immediately puts them on the back foot. They will feel like advocates, selected to speak up and defend applied research.
We believe there is a simple way to achieve parity. Staff, when submitting their EPs, should be able to state their balance of 'applied' to 'non-applied' research, say a 60:40 ratio. Assessment of 'applied NROs or OROs' should be against 'applied criteria', and similarly the 'non-applied' outputs have their own (existing) criteria. The scores are then weighted accordingly. In this way holism and precision are independently assessed and so have parity. We believe the panels will be capable of conducting assessments with this division. Also, importantly, this approach will allow the TEC to determine the relative success of 'applied' and 'non-applied' assessment, which was not possible in their review (stated as 'inconclusive' in paragraph 40). Clearly, some further work is needed to ensure the non-applied criteria are credible, but this task is easier when the non-applied and applied assessments are divided and not being directly compared.

The consultation paper details a number of initiatives that are clearly designed to help encourage the inclusion of applied research and improve the assessment applied research. The only observation we make is in relation to the assessment of applied research.
With reference to the 2012 PAR EAG assessment criteria we note that the primary criteria used to assess applied research was one of change, uptake or application. This focus of outcome or application assumes all high quality applied research will be recognised with high uptake, significant change or widespread application, this is patently incorrect. Moreover the primary assessment criteria should not be one of impact or outcome, it should be one of quality. The PAR EAG appear to have used uptake or change as a proxy for quality in the same way that a journal article might be considered high quality only if highly cited.
While much of the discussion on applied research has been to ensure it is included in the assessment, we believe further work needs to be done on how the quality of applied research might be assessed in the absence of any impact. If impact is the only measure of quality then much applied research will be poorly served by a system with a strict window of assessment with those applied research outputs produced close to the end of the assessment period having little opportunity for impact or application and would be further disadvantaged by being ineligible for the following assessment.
Furthermore, in reviewing some results from the 2012 quality assessment we noted significant differences in some PAR EAG scores and those of the Primary Panel. The 2012 ETA Panel report noted the value of the PARE EAG expertise but also noted that “There were concerns, however, with the consistency and general calibration of the PAR EAG assessments” (page 70). It is the assessment of outputs that we believe needs much further work.
We look forward to reviewing the panel-specific guidelines and trust these will cover the concerns raised.

We agree broadly with most of the suggestions. However, panel members must be people who participate in research in their day to day jobs. Some government funding agencies have recently populated their assessment panels with people who have never undertaken research, which means that a lot of pressure is put on the few remaining panel members who actually understand how research is done.

The University of Waikato supports the changes that have been made to the ways in which applied research is recognised and rewarded as listed in Clause 50. Taken together these provide appropriate guidelines for applied research. In particular, the panel specific guidelines for applied research will be very important in future reviews.

No comment.

The changes made to applied research guidelines should go a considerable way towards addressing concerns about inclusion and assessment of applied research. Continued emphasis that academic citations in ‘A’ international journals, both in written material and in interactions with TEOs are only one way of assessing research impact may help.

Ensure panels include members with applied research expertise and if insufficient members appoint them through a nomination process for applied researchers.
Panel guidelines varied widely in terms of information in the last round. They should all be of a high standard and include specific information on applied research written by experts in this area.

There is still some way to go to achieve parity in the assessment of ‘applied research’. Consider the standard academic output, a research paper in a peer reviewed journal. This is the well-known ubiquitous assessment and immediately achieves tick, tick, tick against the standard PBRF assessment criteria. In contrast, applied research does not have clear tick boxes. The consultation paper tries to address this in a holistic way by drawing on the many possible contributors in order to pull a net around applied research. This is too loose, because ‘holism’ will struggle against ‘precision’ in an assessment process. Therefore, as I believe has been the case, holism becomes an after-thought, invoked when the precision assessment appears too low. This means it will tend only to capture renowned individuals, i.e., those known to panellists, who have apparently scored too low against the standard criteria. We need a system which assesses ‘applied’ and ‘non-applied’ research with parity which, at the outset, is independent of individual and discipline.

The proposed PBRF panel framework also does not have parity. Having applied researchers on panels immediately puts them on the back foot. They will feel like advocates, selected to speak up and defend applied research.

I believe there is a simple way to achieve parity. Staff, when submitting their EPs, should be able to state their balance of ‘applied’ to ‘non-applied’ research, say a 60:40 ratio. Assessment of ‘applied NROs or OROs’ should be against ‘applied criteria’, and similarly the ‘non-applied’ outputs have their own (existing) criteria. The scores are then weighted accordingly. In this way holism and precision are independently assessed, and so have parity. I believe the panels will be capable of conducting assessments with this division. Also, importantly, this approach will allow the TEC to determine the relative success of ‘applied’ and ‘non-applied’ assessment, which was not possible in the review (stated as ‘inconclusive’ in paragraph 40).

Clearly, significant work is needed to ensure the non-applied criteria are credible, but this task is easier when the non-applied and applied assessments are divided and not being directly compared.

50. (bullet point 3). As noted above the descriptions used in the Research Contribution section do not treat all types of Research Contribution as equal as this aim states.
Also, as noted above the perspective in relation to applied research and impact needs to be taken into consideration.

We agree broadly with most of the suggestions. However, panel members must be people who participate in research in their day to day jobs. Some government funding agencies have recently populated their assessment panels with people who have never undertaken research, which means that a lot of pressure is put on the few remaining panel members who actually understand how research is done.

1.The date of eligibility for granted patents must be specified. Is it the date of first publication, or the date of the granting of the patent or another date? Please ensure that all vocabulary re patents is consistent and legally sound. We recommend seeking advice from an experienced patent lawyer in developing all aspects of the guidelines around patents and intellectual property.
2.i. “Impact” (meaning impact external to academia) needs clear definition that includes multiple examples and takes into account (a) that impact may be “downstream” and not immediately following from or in the same general topic area as the research, (b) that impact is difficult to assess and (c) that it is difficult to audit.
ii. Levels of evidence required for audit need also specifying for “impact”.
iii. Dates of eligibility also need to be specified, for anybody using the “impact” sub-category within the Research Contribution component. We recommend that all impacts that take place during the assessment period should be eligible for inclusion in that sub-category, regardless of when the research took place. The alternative, which is that impact is eligible for inclusion if the research took place within the assessment period, would make it possible to include only very short-term impact of research undertaken very early in the assessment period in this category.

My main concern about the applied categories is that individuals in the categories mentioned in point #39 are often highly qualified and respected instructors. Many are professionals with a wealth of practical experience that cannot be easily evaluated by the current PBRF assessment criteria. In my opinion, these individuals who do little or no research should be exempt from the PBRF. What PBRF has done has forced some professionals to undertake research that they do not necessarily want to. This in fact may distract them from their all important duties of educating the new generation. Academic institutions work in teams. Each member of the team has an equally important although different role. It is not all about research. Teaching can still be research-driven or research-informed without every teacher having to have their own research programme. Basically non-performers should be dealt with at the TEO level not the TEC level.

Can you include something that covers support of Research and Development within professional bodies and industry that is different from outreach.

Any other comments

It is critical that final panels include an adequate number of people able to assess applied research. The initial cohort does have some strong people in this regard, but there are still some gaps and these should be considered in the final composition of the panels. It is very important that there are people on panels who can speak for the quality of outputs claimed in applied researchers' portfolios.

No other comments

Do you support the proposed eligibility criteria and guidance, and evidence requirements for 'new and emerging' researcher?

Answer Options	Response Percent	Response Count
Yes	40.0%	6
No	26.7%	4
Partially	33.3%	5

Any other comments

We have some concerns. While we understand that if a person has been employed because they have a strong current independent research track record, they should not be considered 'new and emerging', there are cases where people who may have published a small amount early in their careers (even as PhD students) could inadvertently be denied new and emerging status when in reality, they have not conducted independent research for a very long time, or ever had the employment circumstances to do so. The problem is the very wide range of circumstances which can lead to even senior academic appointments from outside academia. This makes it difficult to write general criteria which always lead to the most appropriate designation.
We strongly disagree with the third bullet point on page 13: "are identified as a sole author/producer of an output that meets the PBRF definition of research, and this output was publicly available prior to the assessment period". We think this should be removed. This definition would unfairly exclude someone from NE status who may have produced an output as e.g. a PhD student many years ago, but who has not had the opportunity to conduct independent research since.
We think this needs more discussion before the eligibility rules are finalised.

No. There are a number of criteria we do not support.
Eligibility
Regarding the eligibility for being 'new and emerging' (paragraph 64), we fundamentally disagree with criterion (b) "be appointed to a PBRF-eligible or equivalent position for the first time on or after 1 January 2012" and propose this is removed from the eligibility criteria. Instead we suggest the 'new and emerging' eligibility criteria should simply be those PBRF eligible staff who commenced, for the first time, substantive and independent research on or after 1 January 2012 (i.e. within the assessment period).
Acknowledging this is a major shift in the new and emerging criteria we nonetheless believe this is an appropriate course of action for the following reasons:
1. Criterion (b) contradicts the key principle for new and emerging researcher eligibility i.e. "that the staff member is undertaking substantive and independent research for the first time in their career" (paragraph 62 of the consultation paper).
2. It fails to fully address the Minister for Tertiary Education, Skills and Employment desire for TEOs to "develop new and emerging researchers" (2014 Cabinet Social Policy Committee paper – Improving the efficiency and effectiveness of the PBRF. pg 2) and support the sustainability of the tertiary education research workforce.
The existing criteria for 'new and emerging' explicitly excludes staff in TEOs who have been employed in degree level teaching for some time, potentially due to their professional expertise (e.g. nursing) but have only just embarked on an independent research programme. Typically these staff will be supported through postgraduate degree study by their TEO with fee waivers significant time allowance for study and more, a particularly expensive development exercise. Unfortunately this group of new researchers are not well supported by the PBRF, rather a TEO is incentivised to ignore developing this part of the workforce and instead are encouraged to recruit new staff i.e. those that meet the proposed criteria, this being much more cost-effective. In our view this is not in the best interests of the sector.
Instead, TEOs should be encouraged to develop their existing workforce as well as recruit new staff when appropriate. This would also incentivise TEOs to embark on the expensive course of developing the research potential of their practitioner staff who typically have been relegated into roles that were either not PBRF eligible (historically a contentious issue) and/or be estranged from the main research and teaching workforce.
Eligibility Exclusions
Further, we do not support the proposal (paragraph 64 of the consultation paper) that:
A staff member is not considered 'new and emerging' if they:
• were PBRF-eligible in a previous Quality Evaluation;
or
• are employed in a role with a higher status and/or salary than a Lecturer or equivalent.
We do not support the first point for the reasons covered earlier.
We do not support the second point, where appointments are employed with a higher status/salary than a Lecturer are not eligible as 'new and emerging' for the following reasons:
1. It is unworkable, in our view as it is vague (i.e. higher status?) and assumes there is consistency of job title and role across the entire sector.
2. It discourages appointments from the professions or industry that often need to be made at a level above that of Lecturer for reasons of remuneration and/or the appointee's professional profile.
3. In our TEO, nearly half of those staff that were classified as 'new and emerging' were at Senior Lecturer level or similar, thus disproving the idea that only Lecturers could be 'new and emerging'.
The exclusion criteria are, in our view, unnecessarily complex and would be redundant if the simplified eligibility criteria we proposed were adopted. These being:
To be considered a 'new and emerging' researcher, a staff member must:
a. meet the requirements of the staff-participation criteria;
AND

AND
b. commenced, for the first time, substantive and independent research
on or after 1 January 2012 (i.e. within the assessment period).
Point b. addresses many of the exclusions listed in the consultation paper and significantly reduces complexity. We also believe it supports the Minister's intent in the redesign of the PBRF.
Evidence requirements
Some staff found the consultation paper description of the evidence requirements confusing when compared with the 2012 requirements. We hope this is clarified in the 2018 PBRF Guidelines and the Panel specific guidelines.

A staff member is not considered 'new and emerging' if they:
(a) were PBRF-eligible in a previous Quality Evaluation; or (Agree)
(b) held a PBRF-eligible equivalent position outside a TEO, including self-employment, prior to 1 January 2012; or (Agree)
(c) are identified as a sole author/producer of an output that meets the PBRF definition of research, and this output was publicly available prior to the assessment period; or (needs clarification)
(d) are employed in a role with a higher status and/or salary than a Lecturer or equivalent (Disagree)
To clarify points (c) & (d)
(c) This needs more clarity and is going to be difficult to administer.
• We interpret this as meaning this only applies to single-authored publications- is this correct?
• It will be difficult to administer. Many clinicians will write editorial material about clinical conditions in journals like the NZMJ that on the surface may look like research but are really professional discussions. The TEO will take the word of the staff member as true. These people may never have participated in research in a substantive way.

(d) This is not sensible.
• Most professional starting salaries are higher that a lecturing salary. First day out of Med School most doctors will earn more that a Lecturer.
• TEOs have no right to ask people what they were earning in their previous employment and will not be able to get this information.
• What is the definition of "higher status" and why should that make any difference if their previous roles did not include research?
We believe that it is legitimate to count people coming into academia and research for the first time as New and Emerging even if they have had a previous professional life as, say, an engineer or a lawyer or a doctor as these jobs do not require people to undertake research. Undertaking independent research for the first time should be the criteria. Professionals do not have some sort of advantage over people coming the PhD route- in fact they often have less experience in research that those who have undertaken a PhD. It is unfair not to classify them as New and Emerging.

1.The revised guidelines about production of research (even as a co-author) prior to an academic appointment will effectively rule out any staff coming from government organisations into academia to meet the NE criteria. Staff in such roles may not have 'research' as the main purpose of their job but may have been involved in the production of reports. The same issue would arise with staff who come from a professional practice background (e.g. a clinical psychologist). Clinical psychologists (and other registered health professionals) frequently carry out small research projects to present at conference and to meet the requirements of registration. They may then wish to move into academia and even though they were in a non TEO and were not teaching / conducting a large amount of research, they would not meet the NE criteria.

The limitations of the employment in a role equivalent in status and/ or salary to lecturer will also cause problems for those who have come to academia from applied professions. Those in private organisations (eg health professionals, or finance positions) often earn much more than University salaries – so they may be appointed at a higher level, which would then rule them out of the NE category. This rule will possibly impact the health related and applied areas (such as finance) more than others, where specific clinical or professional expertise is required. This appears to negate the original intent of the NE category as allowing new academic staff a period of time to develop a research portfolio(RO) and profile (RC).

These criteria will mean that several of our staff will no longer meet the criteria for NE and the only people classified as NE are those that have academic jobs straight from PhD/ post-doc. Those who have worked outside of the TEO after their PhD, before coming back to academia would not be eligible for NE even if they only had a couple of minor co-authored outputs, even though research / teaching may not have been a major part of their role.

We would also like to know how they will know if outputs were produced prior? Particularly if outputs are non-standard (e.g creative and performing arts).

2. The University of Waikato notes the below inconsistency.
Section 64, point c., page 12 indicates that to be considered a new and emerging researcher the staff member would need to
"… undertake substantive and independent research on, or after, 1 January 2012 for the first time in their career. "

However page 13 refers to staff not being considered new and emerging if they were PBRF-eligible in a previous round.
This does not factor in those new and emerging staff who joined a TEO in the second half of the Census Period i.e. 1 January 2012 – 14 June 2012. These staff were included in the 2012 PBRF round but are for all intents and purposes, still new and emerging.

The proposed new and emerging criteria work well for 'traditional' academics who go from thesis level study to academic positions. Further, the revised evidence requirements are positive for new and emerging researchers. The proposals are supported for these academics.

However, there is concern regarding how the new and emerging researcher criteria will be applied to Creative & Performing Arts researchers. As creative and performing arts researchers will be producing creative works throughout their study, and this work is not done under supervision, creative and performing researchers will never be able to be classified as new and emerging. Further, the requirements for a C(NE) quality category do not address how a creative and performing arts new and emerging researcher might be assessed if they have not produced a thesis.

Provides a lot more clarity that was not apparent in previous round guidelines and impacted negatively on the organisation I currently work for.

No comments for this section

56. Conditions of employment should specify “substantive” degree level teaching (p11)
58. keep terminology consistent - specify quality assured outputs as nominated research outputs.

The criteria for ‘new and emerging’ researcher needs more clarification. 64 (b) no longer has the ability for a new and emerging researcher to become research active as the result of changes to their conditions of employment. This statement should be reinstated.
64 (c) substantive and independent:
The threshold for this is very low. A researcher may be named on a paper due to their involvement in a project (such as participating in data collection or analysis) but have had no role in the design of the project, nor have the capacity to initiate and lead their own research projects. We would not consider being named as co-author on a paper as evidence of substantive or independent research, and for emerging researchers or industry professionals new to academia, their inclusion may be the result of them participating in a developmental or support role, rather as an independent researcher in their own right.
The example of supervised or support role is also too limited. Staff who are new to academia from industry may engage in research under the mentorship of another researcher, acting in a support role, for a number of years, before engaging on a research career of their own. These individuals may have been included on publications, but at no time were they engaging in independent research.
In the ITP sector we have a number of staff who may have been employed at the institution, in a non-PBRF eligible position, acting in a support role for other researchers as part of their own professional development, prior to 2012. Changes in employment status has made them eligible for the 2018 PBRF assessment, however under the current definition they would not meet the requirements of a new and emerging researcher due to being named on articles. The definition of ‘support role’ should be broad enough to not just include individuals engaged in study, but also individuals who engage in very minor roles within research projects.

This statement needs further explanation:
“are employed in a role with a higher status and/or salary than a Lecturer or equivalent.” The level at which someone enters academia should not determine their new and emerging status, particular in applied tertiary institutes. Many of our Deans, who hold senior academic appointments, have no formal research training or qualifications, and are appointed into those roles due to their industry expertise. They may become research active as a result of their appointment, however they should then qualify for new and emerging status, as long as they meet all the other requirements.

Evidence requirements:
It should be made clear that a thesis does not need to be submitted as part of the portfolio for a individual to be considered new and emerging. There are many circumstances in which an individual has completed their thesis outside the assessment period, and engaged in their first academic appointment many years after their research qualification was completed. The evidence requirements for C (NE) need to be re-written to reflect the fact that not all qualifications lead in a straight line to academic appointments. The wording of this section implies that a thesis is a requirement for consideration in the C(NE) category.

A staff member is not considered ‘new and emerging’ if they:
a.were PBRF-eligible in a previous Quality Evaluation; or (Agree)
b.held a PBRF-eligible equivalent position outside a TEO, including self-employment, prior to 1 January 2012; or (Agree)
c.are identified as a sole author/producer of an output that meets the PBRF definition of research, and this output was publicly available prior to the assessment period; or (needs clarification)
d.are employed in a role with a higher status and/or salary than a Lecturer or equivalent (Disagree)

C) This needs more clarity and is going to be difficult to administer.
•I interpret this as meaning this only applies to single-authored publications- is this correct?
•It will be difficult to administer. Many clinicians will write editorial material about clinical conditions in journals like the NZMJ that on the surface may look like research but are really professional discussions. The TEO will take the word of the staff member as true. These people may never have participated in research in a substantive way.

d) This is not workable.
•Most professional starting salaries are higher that a lecturing salary. First day out of Med School most doctors will earn more that a Lecturer.
•TEOs have no right to ask people what they were earning in their previous employment and will not be able to get this information.
•What is the definition of “higher status” and why should that make any difference if their previous roles did not include research?

We believe that it is legitimate to count people coming into academia and research for the first time as New and Emerging even if they have had a previous professional life as, say, an engineer or a lawyer or a doctor as these jobs do not require people to undertake research. Undertaking independent research for the first time should be the criteria. Professionals do not have some sort of advantage over people coming the PhD route- in fact they often have less experience in research that those who have undertaken a PhD. It is unfair not to classify them as New and Emerging.

No. We are strongly opposed to the proposed eligibility criteria and guidance, and evidence requirements for ‘new and emerging’ researchers. Indeed, we consider that they are considerably less helpful than the definition used in the 2012 PBRF round and are unworkable as currently drafted.
There are three main concerns:
1.Their purpose is unclear and the proposals offer perverse incentives.
2.Criteria would be impossible to audit, being subjective, non-specific and sometimes undefined.
3.The criterion of “sole author” is not fit for purpose.
Overall there seems to be unnecessary complexity: the proposed guidance includes both inclusionary criteria and exclusionary criteria, which do not entirely align with each other, and the terminology used is to be defined elsewhere (in panel specific guidelines), according to SRG in-principle decisions in paper 2.

Concerns re perverse incentives
It is not clear to us what “evil” the SRG are attempting to address by the proposed changes in definition.
i.A staff member is not considered ‘new and emerging’ if they…are identified as a sole author/producer of an output that meets the PBRF definition of research, and this output was publicly available prior to the assessment period
The intent of this criterion appears to be to exclude from being considered “new and emerging” those practitioners who have produced outputs while being employed (including self-employed) outside academia, regardless of whether these outputs are relevant to employment in a PBRF-eligible position, have been research-informed, or have been supervised, contracted or independently produced. The implication appears to be that TEOs could be financially penalised for employing experienced practitioners over junior non-practitioner academics. This seems perverse, and explicity contrary to the Government’s stated aim for the research system of creating more connections between academia and industry, end-users and communities.1
If the SRG’s concern is that allowing experienced practitioners outside academia to be employed as new and emerging academics will incentivise TEOs to employ more of these as a form of “gaming”, we suggest that the financial realities need further consideration. Experienced practitioners command high salaries and are therefore generally employed because their expertise is essential for the TEO’s mission. A TEO hiring new academic staff purely for the purposes of maximising PBRF revenue would rationally employ the most junior postdoc or equivalent who is likely to meet the criteria for C(NE). There is no “gaming” disincentive in making experienced practitioners ineligible for this category.
We also note that the SRG’s in-principle decisions for consultation paper 2 re eligibility included a proposal that “better guidance regarding PBRF-eligible research outputs and creative outputs completed as part of standard professional practice… be implemented by panels in the panel-specific guidelines due to different disciplines’ interpretation of standard professional practice.” Our concern is that, with the lack of clarity in the eligibility criteria for “new and emerging”, this potentially allows for different disciplines to have inequitable interpretations, resulting in disadvantage to some disciplines over others.
ii.A staff member is not considered ‘new and emerging’ if they…are employed in a role with a higher status and/or salary than a Lecturer or equivalent.
This criterion disincentivises TEOs from promoting and rewarding those new and emerging researchers who are exceptional. For example, a “superstar” appointed low on the lecturer scale at the beginning of the assessment period could easily be promoted to senior lecturer by the end of that period but this should not require them to forfeit their new and emerging status as researchers. “New” refers to length of career, not quality of output. This proposed criterion directly contravenes the primary purpose of the PBRF which is “to ensure that excellent research in the tertiary education sector is encouraged and rewarded.”
In addition, pay and position scales are impacted by more than just research, and are not a clear indicator of research experience. For example, in medicine and similar professional disciplines, the starting level for appointment as academics is normally at senior lecturer, partly in recognition of their long professional training and to address issues of parity with their professional colleagues. Their salary and position are more a reflection of professional experience and teaching than their research, in which field they remain new and emerging. Once again, this criterion would differentially disadvantage researchers in some disciplines over others, and is unacceptable.

Concerns re ability to audit
i.A staff member is not considered 'new and emerging' if they… held a PBRF-eligible equivalent position outside a TEO, including self-employment, prior to 1 January 2012
"PBRF-eligible equivalent position" is not defined. We note that the SRG's in-principle decisions for consultation paper 2 re eligibility included a proposal that "the definition of an 'equivalent PBRF-eligible position' be implemented by panels in the panel-specific guidelines due to the specific nature of what is considered an 'equivalent PBRF-eligible position' in different disciplines" in order "to ensure that this definition is unambiguous and applied consistently". We consider that developing panel-specific guidelines is almost certain to produce definitions that are ambiguous and/or inconsistent. All terms required to define eligibility should be clearly defined to withstand rigorous audit (and potential legal appeal).
We reiterate a point from our submission to SRG paper 2: "The aspects of an equivalent position outside of a TEO that make it PBRF-eligible should be as similar as possible to the aspects that make a TEO position PBRF-eligible; namely, teaching at the equivalent of tertiary level and/or PBRF-eligible research."
In addition to this issue of definition, we consider the criterion is problematic, because TEOs do not always have specifically detailed knowledge about the former positions of new staff, particularly staff coming from overseas. We consider that it would not be possible for TEOs and their CEOs/Vice-Chancellors to certify historic non-academic employment for such staff.
ii.Staff members are considered to undertake substantive and independent research if they undertake the design of research activity and/or the preparation of research outputs (e.g. as a co-author/co-producer), and as a result are likely to be named as an author (or co-author/co-producer) of research outputs.
Staff members who have produced outputs when in a supervised or support role, such as research Masters or PhD study, are considered to be working under the close guidance of a lead researcher. This would not be seen as undertaking independent research.
These two criteria are not helpful. Postgraduate research students are commonly named as authors (or co-authors/co-producers) of research outputs, and these outputs are commonly produced in the public domain after the period of supervision is finished. These criteria suggest that such outputs would disqualify a new postdoctoral academic from being "New and emerging" .
iii.Staff members who have produced outputs when in a supervised or support role, such as research Masters or PhD study, are considered to be working under the close guidance of a lead researcher.
"Support role" is not defined. It should include, for example, technical and clinical staff, or postdoctoral fellows working in support of a group project.
iv.A staff member is not considered 'new and emerging' if they…are employed in a role with a higher status and/or salary than a Lecturer or equivalent.
"Higher status" and "equivalent" are not defined. See comments above about academic roles.

Concerns re "sole author" criterion
A staff member is not considered 'new and emerging' if they…are identified as a sole author/producer of an output that meets the PBRF definition of research, and this output was publicly available prior to the assessment period
i.Identification as a sole author/producer reflects discipline differences not criteria for eligibility. Many STEM researchers, throughout distinguished careers, never produce research outputs as a sole author. So this criterion of exclusion is irrelevant to STEM.
ii.It is entirely possible for postgraduate students (whether (STEM or non-STEM) to produce sole-author research outputs; if they have done so before the assessment period, this criterion renders them ineligible to be considered new and emerging.
iii.This criterion will exclude practitioners in some disciplines (such as architects, musicians, artists, creative writers, lawyers), where sole authorship is the norm, but not those in other disciplines (such as scientists, engineers, doctors, allied health professionals) where joint authorship is more common. A definition that applies differentially to different disciplines, and is therefore likely to disadvantage some disciplines over others, is completely unacceptable.

In addition to the concerns above, we are concerned that the quantity of research outputs required in order to be considered C(NE) has been lowered from the 2012 requirements. The 2012 PBRF guidelines were not always unambiguous and a brief survey of 2012 panel chairs suggests they were interpreted differently by different panels. However at one point in the 2012 guidelines it is made clear that at least two research outputs other than a thesis are expected: "…new and emerging researchers who have completed a PhD and two quality assured research outputs (ie. are eligible for the award of the "C(NE)" Quality Category) will not be disadvantaged if they include evidence of peer esteem in their EPs." 2 (This is a higher quantity threshold than that proposed in the current consultation paper: "If a Doctoral, Masters or professional qualification thesis is submitted as evidence within the Research Output component, it is normally expected that at least one other quality-assured research output should also be included, in order for a new and emerging researcher to be considered for the Quality Category "C(NE)".)
We would prefer that the quantity be at least: a doctoral/masters/professional qualification thesis or equivalent and two (rather than one) other quality-assured research outputs; or the equivalent of these. Given the increased funding weighting for C(NE), this is more appropriate, and it is in line with the most usual interpretation of the guidelines in the 2012 round. In addition, keeping the 2012 phrasing that "a minimum of two quality-assured research outputs would normally be expected" (emphasis added) gives panel chairs leeway to award a C(NE) status in unusual cases, such as when a researcher only has a thesis plus one other research output but they are very recent outputs and of exceptional quality.
Notes:
1. For example: "we need to focus on building scientific excellence and relevant connections with end-users – including industry, public service providers, other research organisations, iwi and communities." 2015 National Statement of Science Investment, MBIE, p13.

We think there should be a period of grace for staff coming direct from industry and who have never taught before; while they may have produced outputs that could be classified as research they are not experienced in understanding research from an academic perspective and may not be able to describe what they do in research terms. Can you extend the NE to apply to staff if they haven't taught on a degree or undertaken any research in an academic setting before Jan 2012.

Please describe and detail any areas or issues relating to the review of the assessment framework, applied research, or the 'new and emerging' researcher eligibility criteria and evidence requirements that require our attention.

We think it is very important that part time employment is considered in the holistic process in all cases where part-time employment has had an impact on the quantity of research activity claimed. In the current draft guidance, it is not explicitly addressed.

Cross-referrals:
We question whether a cross-referral should be scoring an entire section of an EP, e.g. Research Outputs, when the EP might contain just two outputs germane to the expertise of the cross-referral Panel. An alternative is for the Panel receiving the cross-referral to score just the selected items – the items for which they have expertise to assess - and for the Primary Panel to then incorporate this information into their assessment, and scoring, of the complete EP.

There are no other matters we wish to bring to your attention. Thank you for consulting.

In my opinion the weighting on RO is too high. The contribution from RO and RC should be more equal. This is because RO results from obtaining grants to supply consumables, equipment or personnel. There is not enough grant funding so those researchers with little funding cannot be expected to have as many outputs. They can have just as much if not more in the RC category.

While it has been signaled that more guidance will be provided in the guidelines on applied research, this also needs to be consulted on well in advance.