

# Universities New Zealand's feedback

## on the PBRF Review Report

Electronic submission to [PBRF.Consultation@education.govt.nz](mailto:PBRF.Consultation@education.govt.nz)

### Introduction

This submission is made by Universities New Zealand – Te Pōkai Tara (Universities NZ<sup>1</sup>) on behalf of the eight universities. It was prepared after extensive consultation with multiple representatives of the university sector, recognising that each university will also make its own submission expanding on the contents of this submission and raising additional issues.

We have chosen to structure the UNZ submission to reflect high-level affirmations and concerns about the PBRF review panel's ('the panel') recommendations in the PBRF review report ('the report'), instead of using the detailed feedback template provided by the Ministry of Education (MoE).

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### Executive summary

Universities strongly support several of the recommendations made by the PBRF review panel. We particularly welcome the panel's recommendation that the PBRF fund receive a significant increase in government investment. This will address the decline in the investment in real terms and further incentivise tertiary institutions to deliver excellent research that will help to maintain New Zealand universities' international competitiveness. UNZ notes that the current PBRF fund value has remained unchanged since 2018—the longest period without fund increases since 2006.

There are, however, significant concerns about several recommendations that would, in our view, have or lead to unintended negative consequences. These concerns include the definition of excellence; the conflation of excellence with impact; the implementation of several recommendations, and the efficacy of inclusion and equity measures.

It is important that these potential unintended negative consequences are further understood and mitigated to preserve the appropriate emphasis on the fundamental objective of the PBRF: to reward excellence in research. This in turn is critical to driving the behaviours necessary to ensure universities continue to deliver for the country and to be internationally recognised institutions. We have therefore suggested ways, primarily through expanding the scope of the sector reference group, to investigate and mitigate these anticipated unintended consequences, while still giving effect to the panel's intentions.

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<sup>1</sup> Universities NZ is the operating name of the New Zealand Vice-Chancellors' Committee, a body established under Part 19 of the Education Act 1989. It has statutory responsibilities for university quality assurance, the approval and accreditation of university academic programmes, entrance to universities, and scholarships. It also represents the interests of the universities on a wide range of other matters, such as education and research policies.

It is critical that many of the recommended changes to the PBRF are introduced after the 2025 Quality Evaluation, following careful consideration and consultation with the sector.

We have chosen, in this submission, to respond primarily to the review report rather than MoE's discussion document. However, we are also concerned about the misalignment between these two documents and outline these concerns in greater detail below.

## Affirmations

New Zealand universities welcome several recommendations made by the panel:

1. retaining the Quality Evaluation and Research Degree Completion measures (recommendation 20)
2. retaining the six-year timeframe between Quality Evaluations (recommendation 25 [except for the 2024 round, which is postponed by one year because of the impact of Covid-19 on the research workforce])
3. retaining external peer review (recommendation 22)
4. retaining the assessment focus at the level of the individual rather than at a group or institutional level (recommendation 24)
5. emphasising the importance of research based on kaupapa Māori, mātauranga Māori and Pacific-based research methodologies
6. the additional investment of \$100 million into the PBRF fund (recommendation 32)
7. the removal of the Average Quality Score (recommendation 33).

## Concerns

We are concerned that several of the panel's recommendations, while directed at important matters that warrant further attention, will potentially have unintended negative consequences. These are explained below. We also want to highlight the misalignment between some aspects of MoE's associated discussion document and the panel's recommendations in its report.

### 1. The purpose of the PBRF

Several recommendations by the panel, if adopted, will result in a fundamental shift in the scope and purpose of the PBRF.

It is important that the PBRF is not used as a mechanism to achieve all current objectives of government-funded research. The PBRF was intended primarily as a capability fund for institutions of higher learning "to maintain and lift their competitive rankings relative to their international peers" and "support world-leading teaching and learning at degree and postgraduate levels".<sup>2</sup> We recommend the preservation of these core objectives. We consider that if the PBRF core objectives are broadened *and* the funding per unit of assessment is not substantially increased, the PBRF will become less relevant and less engaging for the sector. This will ultimately make the PBRF less effective in helping deliver its primary objectives.

All eight universities believe strongly in the principles of equity and diversity. This is evidenced by the fact that Universities New Zealand has outlined targeted options (eg, fully funded post-doctoral positions for Māori and Pasifika early career researchers) for addressing inequalities in

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<sup>2</sup> Terms of Reference for PBRF Review, 2019. <https://www.education.govt.nz/assets/Documents/Further-education/PBRF-Review/Terms-of-Reference-for-the-PBRF-Review.pdf>

the tertiary system as a part of every briefing to incoming Ministers, and in suggestions made to Government in each of the last six Budget rounds.

While we strongly endorse the panel's recommendations that equity issues in research must be addressed, we do not believe that the PBRF should be the only mechanism to do so. A careful balance must be struck to preserve the PBRF's objective to reward excellent research while also addressing inequities in the research sector. This is *not* to say that excellence and equity are mutually exclusive, but rather that careful consideration is required to avoid de-emphasising excellence and risk losing or diminishing the international competitiveness of our New Zealand universities, while addressing issues of equity.

In fact, if the PBRF changes are designed correctly, excellence and equity might indeed be mutually reinforcing. We believe that such changes should be carefully investigated by the Sector Reference Group before MoE or Government agrees to implement them. It may require substantial time to do this properly, but we consider this will be well worth the investment. In the interim, we suggest that MoE considers other mechanisms in addition to the panel's recommended changes to the PBRF to expedite progress towards achieving equitable outcomes.

## **2. Excellence and impact**

The panel recommends the nominated research output section should be replaced with a new section that allows researchers to present examples of excellence in research, including scholarly and (broadly defined) non-scholarly impacts of the research (recommendation 2).

We believe that research excellence is different to research impact and the panel's recommendation risks conflating the two.

Excellent research is a precursor to high-impact research; therefore, they warrant separate assessment at different times (full impact can occur even decades after excellent research is complete) and at different levels (individual versus institutional, respectively). Impact is often not linearly linked and attributable to a single line of research and is, in fact, often the sum of divergent research streams running over different timescales.

There is also a difference between excellence as an action and excellence as an outcome. This distinction should be taken into consideration if excellence for the purposes of the PBRF is redefined. In this case, there will also be implications for describing the qualifying non-research outputs.

Furthermore, it is UNZ's view that excellence can only be truly judged by the scholarly community within the relevant disciplines. Therefore, any new or more broad definition of excellence must allow for the scholarly judgement of the assessment panels to take precedence.

Universities are, and will remain, strong advocates for research that has an impact on society, the environment and economy, but a shift away from research outputs as the key evidence of 'excellence' is problematic. We agree that impact matters—and the PBRF already provides the opportunity for impact to be articulated and rewarded through the Quality Evaluation (eg, via strong evidence statements in the Research Contributions section of Evidence Portfolios).

As many government funds focus heavily on impact (eg, National Science Challenges, Centres of Research Excellence and the Endeavour Fund), introducing additional impact metrics risks diminishing the vital contribution researchers make to push knowledge frontiers where the time to impact of extremely important work may be outside the timeframe of the related PBRF assessment period.

Climate change research and longitudinal health studies are prime examples where research undertaken in the 1970s and 1980 is now producing societal impact. It would seem perverse to incentivise research in universities that precludes this type of long-term fundamental research, which might require decadal scale observation and where impact might seem abstract when the research is originally conceived and initiated.

As discussed in our 2019 PBRF submission (see Appendix 1), not only is there already scope to record research impact in the existing research contributions section, but measuring impact is fraught with challenges (definitional, audit, attribution of impact and timeframes over which impact is demonstrated for example) and—as highlighted by the UK RAE experience—it is also expensive. Measuring impact does not significantly alter the overall distribution of funding across institutions, also evident in the UK.

We wish to emphasise that the proposed replacement of nominated research outputs with evidence of excellence and impact could lead to the creation of an industry around impact statements instead of focusing on concise, auditable information. Impact can only be consistently and appropriately measured at the level of the academic unit or institution rather than the individual. Therefore, we consider that the PBRF is not the right mechanism to assess and reward impact.

The retention of nominated outputs (and their excellence) is one way of ensuring that universities continue to develop intellectual independence, are repositories of knowledge and expertise, and are undertaking teaching and research of international standing. These activities are consistent with the unique and specific attributes of being a New Zealand university as stipulated by Clause 4(a) Section 162 of the Education Act (1989).<sup>3</sup>

We do agree that a broader definition of excellence could be explored further, but this should be done with careful consideration of internationally relevant assessment systems and measures that enable researchers and institutions to benchmark the quality of their work. If the definition of excellence is too tightly tailored to a New Zealand context, we risk losing the ability to demonstrate our international competitiveness.

We wish to continue to be recognised as internationally relevant and competitive organisations. The PBRF is one of very few mechanisms and sources of funding that rewards research excellence. Its focus on excellence, using the appropriate mechanisms, should be preserved.

### **3. Operationalising the panel's recommendations**

We welcome the panel's recommendation to establish a sector reference group (recommendation 34). We strongly advise that the scope of this sector reference group (or

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<sup>3</sup> "In recommending to the Governor-General under subsection (2) that a body should be established as a college of education, a specialist college, a university, or a wananga, the Minister shall take into account—  
(a) that universities have all the following characteristics and other tertiary institutions have 1 or more of those characteristics:

(i) they are primarily concerned with more advanced learning, the principal aim being to develop intellectual independence:

(ii) their research and teaching are closely interdependent and most of their teaching is done by people who are active in advancing knowledge:

(iii) they meet international standards of research and teaching:

(iv) they are a repository of knowledge and expertise:

(v) they accept a role as critic and conscience of society;"

groups, if need be) be expanded *before* several of the panel’s recommendations are adopted, and that the sector reference group/s give careful consideration to the way in which the recommendations are operationalised/implemented.

Many of the panel’s recommendations will be difficult to operationalise and therefore risk compromising the realisation of the intent of the changes. These recommendations include:

- redefining and measuring research excellence (recommendations 1, 9 and 15)
- shaping the composition of peer review panels (recommendation 6)
- the simplification of the early career researcher definition (recommendation 26)
- the training of assessment panels accordingly (including, but not limited to, recommendation 7).

We also wish to highlight that any changes to definitions should be done well before Quality Evaluation rounds so the research sector can adapt to these changes. It is also important—and only fair to researchers—that the guidance that assessment panels receive is totally transparent.

The sector reference group should also explore pragmatic ways to recognise the important interdisciplinary, transdisciplinary and multidisciplinary shift in research. The discipline-specific panel structure obviously provides easy reference for funders and universities to assess the strength of research through the time, but this should not be a constraint on nor a disincentive to the development of transdisciplinary research, and its subsequent fair and transparent assessment in the PBRF process.

#### **4. The review of subject-area weightings**

We do not support the panel’s recommendation 14 to review subject-area weightings. Any changes that result from a review will just create inequities in other subject areas. A review of this scale would also require substantial effort on the part of Government and the sector over several years while adding no value to the PBRF process.

#### **5. Misalignment of the associated discussion document with the panel’s report**

MoE’s discussion document contains several instances where there is a notable misalignment with the panel’s recommendations. The most concerning is the substantially greater emphasis on research impact in the discussion document. As noted above, we do not support any further emphasis on impact than the PBRF process already allows.

The discussion document is also silent on the recognition that the PBRF is overdue a significant financial boost from the Crown. The case for a substantial increase in PBRF funding was supported by MoE’s 2019 analysis of the PBRF,<sup>4</sup> which showed that “the increased number of staff...and the increased number of research degree completions has outpaced increases in PBRF funding” (p 1).

The discussion document also does not acknowledge that the core purpose of the PBRF is—and should continue to be—to reward excellent research “to assist New Zealand’s TEOs to maintain and lift their competitive rankings relative to their international peers”. We believe it is important that the behaviours that MoE and the Government seek from the research community—to continue to strive for excellence in research—are deliberately restated.

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<sup>4</sup> Smart, W. (2019) Government funding for research-led teaching and research performance - an analysis of PBRF and research top-up funding allocations, Ministry of Education, New Zealand.

## Appendix 1. Excerpt from UNZ’s 2019 submission to the PBRF review

“We do not support any move to introduce further measures of impact in the PBRF.<sup>5</sup> Several reasons for our position are described below.

### **The PBRF already adequately supports impact assessment, so no additional measures of impact are required.**

Research impact can take many forms and there are several ways in which the PBRF adequately supports impact assessment; some direct and others more indirect:

- Research impact can be, and has been, reported in the existing ‘Research Contributions’ components of the Evidence Portfolios. In the 2018 QE round, the ability to recognise “contributions outside academia” equally alongside “peer esteem” and “contributions to the research environment” was added. This allows researchers who have made strong research contributions that have led to economic, social environmental or other impacts to be recognised.
- The PBRF’s measurement of research degree completions has driven universities to grow their postgraduate student numbers and increase completion rates. As institutions of higher learning, the greatest impact a university can make is through its graduates’ contribution to society.
- Impact is also captured indirectly through the PBRF’s measurement of external research income. This source of funding is secured only if the funders/stakeholders are confident that the research will have the desired impact.

### **Measuring impact is fraught with challenges and is expensive.**

No consistently used, valid and reliable way of measuring impact exists that is not fraught with unintended consequences—such as a highly selective representation of research being considered for assessment and high costs associated with preparing case studies.<sup>6</sup>

There is extensive literature on the challenges of trying to measure impact—particularly for basic research where any impact may not be seen for decades and where predicting likely or potential impact earlier is effectively impossible. Much university research is aimed at developing scholarship and/or the research history that allows more junior researchers to develop the reputation necessary to successfully pursue research relationships and research funding later in their careers.

### **Measuring impact doesn’t significantly alter the overall distribution of funding across institutions.**

The extensive (and expensive) addition of impact case studies to the United Kingdom’s Research Excellence Framework had limited overall effect on distribution of funding. This is, in part, because in most disciplines, there is a strong correlation between impact over time and quality as measured by the current PBRF metrics. Thus, indirectly, the current PBRF already provides some measure of impact.

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<sup>5</sup> UNZ letter to Minister Salesa, 6 November 2018.

<sup>6</sup> Bornmann, L. (2017), Measuring impact in research evaluations: a thorough discussion of methods for, effects of and problems with impact measurements, *High Educ*, 73 (5), pg 775–787, <https://doi.org/10.1007/s10734-016-9995-x>

**The potential for impact is already a focus of several government research funds.**

Excluding the proportion of university research funding that comes from PBRF and SAC, 74% of university research funding is from the Crown through funds awarded based on an assessment of both quality and likely impact. We would argue that there is already enough incentive for impact through other Crown funds.

It is also important that the PBRF is not used as a mechanism to achieve all known objectives of government-funded research—to become ‘all things to all people’. This will put the PBRF at risk of not delivering on its core objectives. The PBRF is primarily a capability fund for institutions of higher learning and we recommend the preservation of the PBRF’s core objectives.

Furthermore, given the many government funds that focus heavily on impact, introducing additional impact metrics risks further restricting the little freedom researchers have to push knowledge frontiers without fearing they may fail to deliver on impact measures. Universities have the discretion to invest this bulk, untagged funding in whatever way they think will contribute to the production of quality research. This can include PhD scholarships, research facilities, library resources, and/or funding for research-active teaching staff. It also includes all the things identified as strengths of the bulk-funded system back in 2001—namely the ability to support early-career research, fundamental research in areas that are interesting but where there is significant uncertainty about impact, etc. Together these create eco-systems that foster the production of capable researchers and excellent research as evidenced by the 92% increase in the proportion of PBRF ‘A’ and ‘B’ rated researchers between 2003 and 2018.<sup>7</sup>

The rationale that shaped how PBRF was implemented in 2002 is still fundamentally relevant in 2019. The 2001 Tertiary Education Advisory Commission (TEAC) report that led to the establishment of PBRF<sup>8</sup> noted that it was important that research funding existed over which universities had a high degree of discretion. Discretionary funding would enable universities to easily support:

- (a) new academic staff who were not yet in a position to compete for external funding
- (b) disciplinary areas where little external funding was available
- (c) new areas of research that may have struggled to attract funding
- (d) academic staff in their role of critic and conscience of society.

However, the TEAC also wanted to ensure there were incentives for research excellence and adequate public accountability over how the highly discretionary research funding was spent. PBRF was designed and implemented to balance these factors.

**If impact is given greater weighting in future PBRF rounds, careful consideration should first be given to the definition and measurement of impact.**

If the review panel recommends that research impact receives greater focus in future PBRF QE rounds, we urge that before this is implemented, careful consideration be given to defining both ‘impact’ (in a way that is appropriate for all fields of research including kaupapa Māori research), and what may be required to assess quality. We also urge the panel to consider the way in which the unintended consequences can be minimised, for instance, by recommending a low-cost, low-

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<sup>7</sup> Improving Research Quality - The interim results of the PBRF 2018 Quality Evaluation (April 2019) Tertiary Education Commission.

<sup>8</sup> <https://education.govt.nz/assets/Documents/Further-education/Policies-and-strategies/Performance-based-research-fund/PBRFHistoryAndOverview.pdf> - see tables 1 and 2 on page 3.

compliance method of assessment. Assessing the impact of research is possible through the existing 'Research Contributions' components of the Evidence Portfolios. In future QE rounds, better guidance and exemplars for appropriate impact statements and supporting evidence could be provided."