Stakeholder Feedback November 2015

PBRF SRG Consultation Paper #7 - Review of the general and Canterbury Earthquakes Special Circumstances provisions

The information below is a summary of the Performance-Based Research Fund (PBRF) Sector Reference Group's (SRG's) seventh consultation paper on the review of the general and Canterbury Earthquakes Special Circumstances provisions.

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

A. General Special Circumstances

13 Individual

1. Do you support renaming the provision 'extra-ordinary circumstances'?

Answer Options	Response Percent	Response Count
Yes	90.9%	10
No	9.1%	1

Comments

Yes, support this submission. The term 'extra-ordinary circumstances' should replace the term 'special circumstances'. This term is much more explicit and effective in communicating the intent of this provision.

Yes because of the very high number of applications citing special circumstances

Yes. We believe it is essential that any provision for accommodating special circumstances is better defined so as to indicate that these circumstances are created by "extra-ordinary" events, or more precisely those events that are explicitly "beyond the control" of the researcher. Within that renaming to "extra-ordinary circumstances", we acknowledge the retention of the Canterbury Earthquakes Special / Extra-ordinary Circumstances category. The ability to retain such an additional category (as circumstances might from time to time require) would reflect those events that affect a group, institution, region, etc. and that might otherwise be called unexpected extra-ordinary circumstances. The Canterbury Earthquakes falls within this latter classification.

We believe this clearer definition of these two sets of extra-ordinary circumstances is necessary, as different circumstances will likely require different assessment procedures and subsequently different responses and solutions that are fair to all.

The TEU supports re-naming the Special Circumstances provision to Extraordinary Circumstances. This emphasises that the provision should only be sought in very exceptional cases.

The University of Waikato supports the TEC's proposal to rename the 'special circumstances' as 'extra-ordinary circumstances'. Waikato agrees that this renaming provides a clearer signal to submitters that these circumstances need to be uncommon and unexpected.

The University of Auckland has no preference regarding the provision name.

The title is not particularly important to me, but I do think the term "extra-ordinary" it too extreme. There are many significant circumstances that affect a person's productivity that are not extra-ordinary or unexpected.

2. Do you support establishing a minimum time period of three years (non-contiguous) during the assessment period over which the circumstances need to have occurred?

Answer Options	Response Percent	Response Count
Yes	72.7%	8
No	27.3%	3

Comments

Yes, support this submission. This threshold will help to clarify the eligibility of a particular circumstance.

Yes as long as it is clear that it is also over all circumstances.

We proposed a minimum duration of two years not three. In particular this would better allow for the severity and nature of the extra-ordinary circumstances. For example, a short, intense; but never-the-less severe; event might affect an individual for only two years (33.3% of assessment period) and not three.

A fairer system would not only describe the basis of the consideration of extra-ordinary circumstances (as described above), but might also schedule the nature of the consideration process in the context of the duration and severity of the impairment. This level of scheduling has its parallel in insurance policies, whereby the insurance policies commonly describe the criteria for assessing the duration and severity of impairment, and the response to that impairment is also clearly enunciated by the insurer in defined schedules. Furthermore, if the duration of impairment is a sanctioned as a consideration, then a balance will need to be struck on whether the extra-ordinary circumstances affect the quality of the research activities, or merely their quantity.

We recognise that it would be helpful to be able to place a timeframe around these circumstances however we are uncertain whether this is the solution. We also think that three years is too long. Additionally it is difficult to measure the impact of an event or circumstance. As well, the timing of the event or circumstance could be material - for example if it happened in the middle of the PBRF cycle, it may have more impact than at the beginning.

Waikato supports the TEC's proposal to establish a minimum time period of three years (non-contiguous) during the assessment period over which the circumstances need to have occurred.

The University supports this suggestion. We agree that it aligns with 2012 understandings and practice while helpfully formalising advice, assisting to ensure clarity and transparency.

We think that three years is too long. We would favour a period less than 3 years to better accommodate shorter duration but high impact events which have a continuing impact on research (for instance, suicide of a child).

The minimum of three years should be much lower if this policy is to achieve its stated goal. I believe that a minimum or 1 or 1.5 years is reasonable. Otherwise the policy will miss a number of people who do have sustained and significant circumstances and deserve equal treatment. The three year requirement would discriminate against women (who, on average, have two children). It is unreasonable to place a woman (or any parent) who took care of new babies for a total of 2 years, in the same group as those who had no time off work and no family responsibilities whatsoever.

3. Do you agree that submissions of extra-ordinary circumstances where the EP has no reduction in quantity in either the Research Output component or the Research Contributions component are not allowed?

Answer Options	Response Percent	Response Count
Yes	90.9%	10
No	9.1%	1

Comments

Yes, fully support this submission. This is consistent with previous evaluations.

Yes. However, potentially someone might claim special circumstances but not list all of their outputs for the period. This will introduce a need for additional resources to check this.

Yes. However, in the case that someone claims special circumstances but does not list all of their outputs for the period will introduce a need for additional resources to check this.

Yes as it is only about quantity of research outputs or research contributions. If the person has the maximum number it is not evident that quantity has been affected. This needs rewording - that submissions of extra-ordinary circumstances are not allowed where the EP has no reduction in quantity in either the Research Output component or the Research Contributions component.

It would depend on how would that be determined or triggered?

Yes - given that the criteria for extraordinary circumstances is quantity of outputs or contributions, not quality. To do otherwise would be misleading for individuals.

The University of Waikato supports the TEC's proposal to formalise the basis for special circumstance assessment by not allowing submission of extra-ordinary circumstances in 2018 evidence portfolios where the portfolio contains no quantity reduction in either the Research Output or the Research Contribution component.

The University disagrees with this proposal for the following reasons:

- 1.It is unworkable and would be ineffective: it would not reduce the number of researchers claiming extra-ordinary circumstances, instead it would merely compel those researchers claiming extra-ordinary circumstances to hide research outputs and contributions to the research environment in order for their claims to be considered. It might even incentivise a reduction in research activity or research contributions. That is surely not desirable.
- 2.It falsely assumes that extra-ordinary circumstances can affect only the quantity of a researcher's outputs, not each output's quality (or the proxies for quality such as place of publication). The purpose of the "Other Research Outputs" section is to provide some context for the NROs (i.e. to show how the NROs fit into a "platform" of research). The person whose EP is being assessed might have produced the "maximum" allowable number of outputs, but the quality of those outputs might not give as good a context as would have been possible otherwise. The same problem pertains to the "Research Contributions" component. To prohibit someone from claiming significant and legitimate special circumstances is simply not fair, and would reduce the consistency and credibility of the PBRF, violating two of its founding principles.
- 3.Point 2 is exacerbated as "The PBRF is primarily concerned with the quality of research and not the quantity of research output" (2012 PBRF guidelines, p117). The quality of each item will influence assessment in the current round even more than it did in 2012, given the reduction in the number of Evidence Portfolio items. Given this well-placed emphasis on quality, it is important that researchers in extra-ordinary circumstances have the right to explain their situation, even if they have been able to produce the maximum number of EP items.

Who decides whether there has been a reduction in quantity?

4. Do you support aligning the circumstances allowed for in the provision with the prohibited grounds of discrimination set out in the Human Rights Act 1993?

Answer Options	Response Percent	Response Count
Yes	91.7%	11
No	8.3%	1

Comments

Yes, support this submission. Consistent with alignment to relevant legislation.

Yes but should include part time employment - see below

The 3 types do reflect exceptional circumstances that could affect the quantity of the research undertaken during the assessment period.

The University of Waikato supports aligning the circumstances allowed for in the extra-ordinary circumstances provision with the prohibited grounds of discrimination set out in the Human Rights Act 1993.

Nonetheless, the University of Waikato remains concerned that workers who only have part-time employment may have reduced outputs. In this regard, it may be useful for TEC to consider appropriate modalities to equitably consider their interests.

The circumstances allowed for in the provision should of course cover all the prohibited grounds of discrimination set out in the Human Rights Act 1993, but they should not be limited to these grounds. The Human Rights Act outlines only the legal minimum required by law. It does not outline what is appropriate in any and all contexts.

In the context of the Research Output component, the circumstance of a substantial leadership position should also be covered by the provision. The consultation paper's reference to "claiming leadership positions as a negative impact then using the same position as a Peer Esteem or Contribution to the Research Environment" as a "misuse" of special circumstances in the 2012 round is incorrect. This is not a misuse. It is clear that a substantial leadership position could have significant impact on the RO component of an EP (the most important component), while on the other hand, appointment to such a position could be viewed as evidence of research contributions. Researchers should be given the opportunity to explain this. For example, someone may become a Dean or DVC or similar during the assessment period; even if they can still provide a high quality EP, they may need to claim special circumstances for a sudden reduction in output or other contributions.

We agree that the criteria around this type of extra-ordinary circumstance need to be tightened, but do not agree that this circumstance should be removed completely.

Possible criteria could include a minimum FTE time commitment to the leadership position. For example, 0.4FTE would seem an appropriate minimum, as it is likely to reduce research time by 50% on the basis of a standard 40:40:20 (research, teaching, service) workload allocation (0.2FTE of the leadership position would be covered by service; the teaching load is likely not to change).

I agree with the sentiment above but it is not adequate as described below

5. Do you support with the three proposed circumstances types:

- Long-term illness or disability of a nature that would reduce the quantity of research outputs or activities.
- Extended personal leave of a nature that that prevents research activity from occurring.
 This includes sick leave and parental leave. Sabbatical leave is not considered in this circumstance
- Significant family/community responsibilities of a nature that prevents research activity from occurring. This includes responsibility for dependents and/or to specific communities, such as iwi and/or Pacific communities.

Answer Options	Response Percent	Response Count
Yes	37.5%	3
No	62.5%	5

Comments

Partial support. Support the three listed circumstance types but with respect to the SRG's view, we strongly submit that 'Part-time employment' should be a valid circumstance type to ensure equitable assessment.

Where staff have been employed on a part-time basis (either reduced FTE or employed for only part of the time of the assessment period - i.e. new research active staff) the expectations for the quantity of research outputs is naturally less than staff on full-time employment. While part-time employment might not be considered 'exceptional' it might certainly not be the choice of the staff member to be employed part-time if that is all that's available. This contrasts with a staff member who chooses to have children (parental leave) or one who chooses to take on roles in their community.

For 'New and Emerging' staff there is no explicit mechanism to indicate to the assessment panel how long they have been research active, there is a significant difference between be research active for one year or versus nearly six years. We also disagree with the notion raised in the consultation paper that the circumstance of being research active for the first time would "appear to be part of the normal expectation of an academic staff member's activity" (pg. 7, paragraph 29). We accept every staff member must be 'new' at some time, the issue here is the potential inequity of a staff member who becomes active early in the assessment period versus becoming active very late in the assessment period. A potential solution to the issue of how long a New and Emerging staff member has been research active to is provide this information in the portfolio for the assessment panel members, the start date of each New and Emerging staff member is already required for the PBRF census so there would be little effort required to indicate the years and months the staff member has been 'PBRF eligible' or 'research active' within the assessment period.

With regard to part-time staff this population could be 'contained' by setting a minimum threshold of FTE over three years or more. For example only being able to report as part-time if the FTE is less than 0.6 for three or more years of the assessment period.

The number of staff submitting a substantive exceptional circumstance will be limited by the 10% threshold. Any exceptional circumstance types should be validated by Panel Chairs as to whether such a circumstance ever influences a quality category change. It is important that the available circumstance types ensure staff are assessed on an equitable basis and the inclusion of a circumstance for part-time or new staff (where appropriate) would help address an inequity for a marginalised group.

No. We do not agree with the removal of part-time employment as a special circumstance. While most part-time University will probably be able to generate the maximum or near-maximum outputs/items allowed, we would argue that Polytechnic/ITP staff on part-time employment are less likely to be able generate a full list of outputs/items over the 6 year period because of workload and facilities, thus disadvantaging them.

No. The discussion paper suggests that part-time staff have the same opportunities for research that full-time staff do, and that is reasonable. What does not follow, though, is that they also have the time to pursue an equal number of research opportunities, nor that they have the time to produce an equivalent number of refereed outputs. I believe leaving part-time employment out of the special circumstance list disadvantages those academics.

However, in my experience in 3 rounds on the Health Panel, part-time employment was virtually dismissed as a valid special circumstance. This suggests a need for both a policy and Panel training in this area.

We support these types, however, it is problematic that a reduction in content due to part-time employment is not specifically recognised. Although part-time employment is not an 'extraordinary' circumstance in the sector, it is a valid explanation for why a portfolio may have reduced content and should be recognised in some way. This recognition does not necessarily need to be via the special circumstances provision; perhaps an alternative would be to list the FTE on the portfolio for panellists to consider the impact that a researcher's reduced FTE might have on their portfolio.

Part-time employment should be included as it will affect the time which can be dedicated to research, especially if the person has another job, or is a contractor. Many types of research also require access to specific facilities, such as laboratories, equipment, software, computing power and consumables which are only accessible at the tertiary institutions, in a wide range of disciplines e.g. sciences, engineering, technology, health, medicine, computing or humanities research.

At the level of the "General Special Circumstances" provisions, while we cannot disagree with the general statements and directions, and have no issue with the quantity versus quality determination. We do however have issue with some of the detailed circumstances. Our comments are also informed by the Cabinet's decision to reduce special / extraordinary circumstances to 10 per cent of submitted portfolios.

- Long-term illness or disability of a nature that would reduce the quantity of research outputs or activities.
- Yes, but with the proviso that long-term illness or disability didn't exist prior to the assessment period and had also previously been accommodated in employment arrangements for the researcher. The treatment of these might simply be to pro-rate adjust outputs to reflect the proportion of FTE commitment to research.
- Extended personal leave of a nature that that prevents research activity from occurring. This includes sick leave and parental leave. Sabbatical leave is not considered in this circumstance.
- No. We note, however, within the above definition parental leave is a contested area.
- Subject to the comment above, we feel care is needed in giving ANY consideration to special circumstance based on the claim of "parental leave" given that having children is something people chose to do. While it is necessary to work within the provisions of the Human Rights Act of 1993, and in the context of other law around parental leave, it is our suggestion that researchers (female or male) be allowed at most to claim one year of impairment (as measured by reduced output) per child born over the assessment period. Claiming that parenthood is a special circumstance (and presumably for both males and females) is unfair for those who purposefully choose not to have children.

We have difficulty distinguishing between determining care for children at the commencement of their lives, or the elderly in the twilight of their's, where both can be seen as separate or necessarily 'extra-ordinary'.

The exception would be if the parent is required to care for a sick or disabled child over the assessment period and is unable to be engaged in full-time employment. This in turn could be best reflected in a weighted consideration of FTE status across the census years.

• Significant family/community responsibilities of a nature that prevents research activity from occurring. This includes responsibility for dependents and/or to specific communities, such as iwi and/or Pacific communities.

No. We similarly believe real care is needed as regards special consideration around "significant family/community responsibilities". Since research is part of our jobs, claiming that community responsibilities got in the way of doing part of our job, is an employment not a PBRF matter. The consideration needs to be based on whether the affected researcher willingly has chosen to take on those family/community responsibilities and/or whether that has been already accommodated in their employment contract.

Yes. As mentioned in point 4.

Yes - but please see below for our comments with regard to part-time staff and other circumstances - our agreement with removing part-time from the special circumstances category would be contingent on this.

The University of Waikato recommends the circumstance

- "Extended personal leave of a nature that that prevents research activity from occurring. This includes sick leave and parental leave. Sabbatical leave is not considered in this circumstance." To be amended as follows
- Extended personal leave of a nature that prevents research activity from occurring. This includes sick leave, parental leave and periods of unemployment or reduced employment. Sabbatical leave is not considered in this circumstance.

Waikato acknowledges the TEC's comment about part-time employment of a nature that reduces the quantity of research outputs /activities is often the result of circumstances that can be claimed under the provision, e.g. staff members who are employed part time due to recovering from long-term illness. However as it is currently written the provision does not cover periods of unemployment, or periods of reduced employment e.g. the staff member is willing to work but the TEO is unable to offer the staff member a full time position. Accordingly, this may require reconsideration.

The University supports these three proposed circumstances, and strongly recommends also including "substantial leadership positions", as outlined in the response to question 4 above.

We think that part time employment should be included as an allowable special circumstance. The PBRF allows TEOs to put forward portfolios from part time staff, and so the system must be able to recognise the limitations of part time work. We do agree that if a person is working part time for the institution submitting the portfolio, but full time overall (eg more than one employer) in academic roles, then it would not be appropriate to claim special circumstances since there should not be any impact on the quantity of research activity. But if the person is part time overall, then it would be unfair not to consider this as a special circumstance.

But will employers hold it against staff if they admit that these responsibilities prevented research from occurring?

I agree with the above however these do not reflect the reality of staff employed part time for other reasons which are equally valid. For example, how can a staff member working half time on a single longitudinal study running over years eg 4 years and doing much of the study design and set up, contributing to field work and quality control of study be expected within that role to also be producing published papers? There are 2 issues here, one is the nature of the study and length before publishable outcomes are available, and the other is that part time work does have a very real impact of what can be legitimately expected in the way of worker outputs (regardless of if these are published or not)

Any other comments relating to general special circumstances

"Other special circumstances" such as delivery at sub-degree level should be included as the system currently favours institutions where delivery at degree and above dominates. Teaching loads are heavier below level 5, and, in polytechnics, staff may teach a mixture of levels. It does therefore "reduce the opportunities that person has to undertake research or research-related activities".

Our discussions have highlighted concerns about how a "10 percent" threshold might be enforced. We do not believe this can be administered at the individual institution level, as there may be regional effects or effects that adversely affect small institutions.

We also have concerns that if each institution is instructed to internally assess individual special circumstances this again adds to their compliance costs.

Alternatively, if assessment occurs at the national level what incentives might apply for compliance, or sanctions for non-compliance?

We wondered how a situation like a catastrophic fire/break down of IT systems resulting in loss of data and material would be acknowledged under these types of circumstance?

We do think that a much clearer statement about the impact of circumstances such as working part-time, secondment, and high teaching or administrative workload needs to be developed, and that institutions be required to brief all staff who are involved in managing PBRF with their staff.. Currently we have had members report to us that they are being pressured to produce the equivalent of a full-time academic's outputs when they are part-time or otherwise not available to do research (teaching/administration).

B. Canterbury Earthquakes Special Circumstances

1. Do you support maintaining a separate Canterbury circumstances provision for the 2018 Quality Evaluation?

Answer Options	Response Percent	Response Count
Yes	100.0%	11
No	0.0%	0

Comments

Yes the effects have been multiple, severe and on-going in some cases.

The effects of the Canterbury Earthquakes are diverse, considerable and long lasting for people living and working in the Canterbury region. There are numerous public indicators of this. Failure to acknowledge these

Yes - clearly the impact of the earthquakes is ongoing and disruptive to home, work and personal life for Canterbury residents.

The University of Waikato agrees the effects of the Canterbury Earthquakes in 2010 and 2011 have, and continue to be, systemic and long-term and with impacts extending throughout the community. Therefore Waikato supports the TEC's proposal to maintain a separate Canterbury circumstances provision for the 2018 PBRF round.

The University supports maintaining a separate provision as long as its criteria are specific and robust. It should not be a blanket provision; every individual affected should argue their own case.

I have no opinion.

2. If so, do you agree that the provision: a. be referred to as the 'Canterbury extraordinary circumstances' provision; and b. have the same minimum time period and EP quantity restrictions as the general provision?

Answer Options	Response Percent	Response Count
Yes	100.0%	11
No	0.0%	0

Comments

The University of Waikato supports re-naming the provision as the 'Canterbury extra-ordinary circumstance'.

Waikato also supports applying the minimum three year time period and EP quantity restrictions to the 'Canterbury extra-ordinary circumstance' which keeps it in line with the general provision 'extra-ordinary circumstances'

The Canterbury provision should be aligned with the general provision. However, as explained in the general provision section, the University has no preference regarding the name, and disagrees strongly with the EP quantity restrictions, for both Canterbury and general provisions.

3. Do you agree that Accepted Manuscripts included in the 2012 Quality Evaluation as eligible outputs as under the Canterbury Earthquakes provisions are eligible for inclusion in the 2018 Quality Evaluation in their final publicly accessible form?

Answer Options	Response Percent	Response Count
Yes	36.4%	4
No	63.6%	7

Comments

No. This permits the same output to be claimed in two subsequent evaluations. If this is allowed, why are you not allowing pre-prints which appeared in late 2011 to be claimed in the 2012-17 round?

No. This permits the same output to be claimed in two subsequent evaluations. If this is allowed, why are you not allowing pre-prints which appeared in late 2011 to be claimed in the 2012-17 round?

Only from the point of simplicity, as the reason they were accepted was the assumption that they would have been published in 2011.

No. This would be akin to double-dipping and we suspect that it would only be of any consequence to very small number of researchers. We believe there needs to be very clear lines of separation between periods and that "retrospective" consideration from a prior period is inappropriate.

No. This exemption was valid only when applied to the specific alternative time period used during the last round. I do not see this featuring this time and thus this should not be eligible.

The University of Waikato would be uncomfortable with Accepted Manuscripts that had been included in a 2012 evidence portfolio also being eligible for inclusion as an output in its final publicly accessible form, in a 2018 evidence portfolio. Waikato is of the view there are already provisions for portfolios with reduced component quantities due to impacts of the Canterbury earthquakes. Allowing the same research to be used in both a 2012 and a 2018 evidence portfolio may amount to unjustifiable double counting.

The only possible way in which it would be acceptable would be if there were no other Canterbury provisions; that is, no other ways in which the earthquakes are taken into account when the EPs are being assessed.

No. We think that it should be a general PBRF principle that publications only be counted once, so if an accepted manuscript was used in 2012, it should not be able to be used in 2018. But I don't feel very strongly about it.

4. Do you support continuing enhanced panel training on the assessment of the provision?

provision?		
Answer Options	Response Percent	Response Count
Yes	100.0%	12
No	0.0%	0

Comments

Yes, it must be difficult for people outside Canterbury to understand the cumulative effect of the extended period of stress and difficulties.

Yes - it is important that panellists understand the long-term impacts and possible effects of a large-scale civil disaster such as the earthquakes.

The University of Waikato supports the TEC's proposal to continue enhanced panel training on the assessment of the provision. This would be particularly important for any new Panel members.

Yes, the University supports this.

The assessment should look at whether people who truly deserve protection/special consideration are indeed the targets. Assessing whether the 10% target is hit should not be the goal, because 10% is an arbitrary number.

5. Do you agree that a Special Advisor should be appointed to support the Moderators and panels, and monitor the effectiveness of the provision through the Moderation process?

Answer Options	Response Percent	Response Count
Yes	100.0%	12
No	0.0%	0

Comments

Yes it is important for there to be an effective way to support Moderators and ensure the provisions are applied evenly across all panels.

Yes. We understand that this was very helpful in socialising the extent and depth of impacts in the 2012 assessment.

The University of Waikato supports the TEC's proposal to appoint a Special Advisor to support the Moderators and panels, and to monitor the effectiveness of the provision.

Yes, if those with oversight of the PBRF agree that it is necessary.

This person should be neutral and selected/agreed upon by all involved policies. This person should be an academic.

6. Do you support the five impact types proposed?

Answer Options	Response Percent	Response Count
Yes No	90.9% 9.1%	10 1

Comments

A discussion on types of evidence and level of detail would be helpful. Some investigation into this would be required to ensure it's not too onerous. Some documentation may have already been discarded.

Yes. We understand that this was very helpful in socialising the extent and depth of impacts in the 2012 assessment.

5.Do you support the five impact types proposed?

Yes, With some additional comments:

Concern over the type of evidence that might be required especially for type 1 - long-term illness or disability.

Proposed change to type 1 description

Ongoing trauma, stress or fatigue due to the Christchurch earthquakes, which could include personal injury; a personal psychological impact; or on-going fatigue or stress.

Has consideration ever been given to nominating Special Circumstances advisors to panels - perhaps not necessarily every panel, but a small team with responsibility for assessing these situations?

The University of Waikato supports the TEC's five proposed Canterbury Earthquake impact types of on-going trauma, stress and fatigue; loss or damage to house and/or contents; disruption related to facilities/resources; significant additional responsibilities and/or reduced research opportunities. The University of Waikato agrees that the above impact types reflect the nature and on-going earthquake-related issues experienced by staff at the Canterbury-based TEOs.

The University does not support all of the five impact types proposed. There are repetitions between types, some impact types are already covered by general extra-ordinary circumstances, and some categories should also pertain to researchers not affected by the Canterbury earthquakes if they are to be used at all, in order to fulfil the PBRF principle of consistency.

1.On-going trauma, stress and fatigue

University's support: As a general provision or not at all

This should be included in general extra-ordinary circumstance provisions, if at all. For example, if researchers who lost family members in the earthquake are covered, then all researchers who have lost family members suddenly and unexpectedly should be covered.

2.Loss or damage to home and/or contents

University's support: As a general provision or not at all

This should be included in general extra-ordinary circumstance provisions, if at all. For example, if researchers who had their homes damaged in the earthquake are covered, then all researchers who have had their homes damaged by fire or natural disaster (such as cyclones) or in other ways should be covered. "Care and advocacy for extended family who have been displaced or need support" should be covered by the general circumstance of "Significant family/community responsibilities of a nature that prevents research activity from occurring".

3. Disruption related to facilities/resources: Supported by the University

The University agrees with this impact type.

4. Significant additional responsibilities

Not supported by the University, as covered elsewhere.

This impact type is an amalgam of situations already covered under: 1. Disruption related to facilities/resources; 2. General provision "Significant family/community responsibilities of a nature that prevents research activity from occurring"; 3 the University's recommended additional general provision "Substantial leadership positions".

5. Reduced research opportunities

Not supported by the University, as covered elsewhere

This entire category should be covered by "Disruption related to facilities/resources", as the interest is solely in the reduction of opportunities due to the disruption to facilities and resources. This also makes the criteria for extraordinary circumstances more robust.

C. Please describe and detail any areas or issues relating to the review of general and Canterbury earthquakes special circumstances that require our attention but have not already been included in the consultation paper.

Yes, fully support all of the Canterbury earthquakes circumstance submissions i.e. 1-6 above. We believe it is important for the New Zealand research and tertiary education community to continue to support the re-development of research and tertiary teaching capability and capacity in the Canterbury region.

We would support the submission that the Canterbury Earthquakes circumstance provision is exempt from calculation of the 10% threshold of portfolios allowed to contain a special circumstance.

We submit that more explicit guidance be developed and given to TEOs and Panel members in the application of 'extra-ordinary' circumstances. For example, it is assumed that a valid and substantive circumstance would only be effective in possibly converting a quality category to the next category when that portfolio is on the scoring 'threshold'. Clarifying this would help TEOs decide which portfolios might be allowed to state an extra-ordinary circumstance and help panel members apply the extra-ordinary circumstance provision. The TEC is familiar with the portfolios that were 'converted' and this would be useful in informing this material.

It is assumed that the 10% "exceptional circumstances" doesn't include Canterbury Earthquakes.

Propose some penalty for EP which are not consistent with the requirements of "exceptional conditions" where the requirements are clear e.g. can't have full quota of research outputs or contribution to research environment, workload (except for Canterbury Earthquakes).

Leave as an option the quality score from 2006-2011, or take it as a mitigating factor where there are significant discrepancies between rounds.

Some might argue that everyone in Canterbury should be in an extra-ordinary category, and as it currently written the door is open to such claims. There remains, however, general concerns about 'evidencing' such claims, while retaining appropriate privacy requirements.

A second level of concern arises around the assessment of impact / effect - notwithstanding the proposed 2 year threshold (in keeping with all 'extra-ordinary circumstances'). For these reasons we strongly concur with the need for panel training and the appointment of a special advisor (as for the 2012 Assessment).

Finally one suggestion is that the special circumstances be assessed only at the final moderation phase of the overall assessment. Thus all Evidence Portfolios (EPs) would be assessed on their content and any extraordinary circumstance considerations be applied post that assessment. This might give an additional robustness to the assessment process.

In regard to paragraph 42, the University agrees with the SRG that allowing researchers affected by the Canterbury Earthquakes to reuse their 2012 Quality Category results is unwarranted, and supports the decision not to turn 2018 into a partial round.

Events that are discrete but have long-lasting implications. E.g., the death of a child.