



The Co-ordinator,  
ERA EI Review: Public Consultation,  
Australian Research Council,  
Canberra, ACT 2601

28 September 2020

Dear Sir/Madam,

The Australasian Consortium for Humanities Research Centres welcomes the opportunity to provide comment on the ERA EI Review Consultation Paper (2020). As a peak Australasian body focused on research in the humanities, we can speak with authority on university-based humanities research and the nexus with the major cultural institutions. It would be improper to attempt to speak for all our member centres across the Survey's 98 questions, so we will focus instead on a small number of terms of reference where we have strong representative views.

The central point that we make loudly and unanimously is that, for the humanities disciplines, peer review of submissions is essential for the national and international credibility of the ERA exercise. Citation practices in the humanities internationally simply do not perform the same relatively consistent and predictable function they perform in the physical sciences. Moreover, the centrality of books, rather than articles, to core excellence in the humanities is another limit on the validity of citation indices which, we note, only cover humanities journals in a very uneven and superficial manner. A purely quantitative assessment, either of excellence or impact, would create severe distortions and undermine the reputation of Australian research internationally.

Beyond this, while ERA has attained broad respect across the sector, we question the opportunity cost of the exercise for universities and note that there have been some unintended outcomes that should be addressed, if at all possible. In particular, we deplore the idea that assessment should be made more frequent than the current triennial schedule. ERA only has credibility among researchers because it considers performance over time and is able to generate broadly predictable results. Annual assessment risks introducing meaningless variations in assessment and would provide no more information than triennial or longer, at much greater expense to the university sector. Indeed, increased frequency might well lead to an increase in gaming activities.

There are also unintended and undesirable consequences of the relatively high low-volume threshold of 50, accentuated by the prevalence of single authorship in humanities. This threshold makes many humanities disciplines in smaller, regional institutions invisible. While we acknowledge that there has been inflation in the number of outputs submitted in the exercise and that the larger metropolitan universities struggle with the opposite problem of wanting to hide activities in areas they do not want ranked, there is a risk that institutions outside the major cities will cease to fund those areas of the humanities where there is already very little research undertaken. This may be part of ERA exercise's overall strategy, but it reduces the opportunity for new strengths to develop over time. A lower threshold would permit a truer picture of the national research profile to emerge, and encourage greater diversity of research, something potentially of higher value in the humanities than in some other areas.

When it comes to impact and engagement, we argue that the humanities are much better served by narratives of value than by measurement. The very large element of public rather than commercial benefit in our sector means that contract research is a very unreliable proxy for success. Impact and engagement are important to humanities researchers, but they only have meaning within an explanatory context. Consequently assessment of a selective number of rigorously evidence-based narratives would give a much better account of society's return for investment in humanities research than any falsely homogenising measures.

Finally, we are an organisation comprised of humanities research centres and institutes around Australia and New Zealand where innovative interdisciplinary research most often occurs. So we note with sadness that ERA's structural dependence on FoR codes means that it will always be a relatively poor mechanism for evaluating interdisciplinary research, in the humanities as elsewhere. The gravitational pull of discipline-based codes cannot be counteracted without generating a very different system (no doubt one with other biases), so this should simply be recognised as a limitation of ERA as an evaluative exercise.

Yours faithfully,

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