



 **ADVOCACY**

UMSU Feedback on the Draft Responsible Conduct of Research Policy (MPF1318)

12 December 2025



Introduction

The University of Melbourne Students Union (UMSU) welcomes the opportunity to put forward our views on the amendments to the draft *Responsible Conduct of Research Policy* (MPF1318).

The University of Melbourne's newly published Strategy: 2030 recommits to improving the student experience as one of its areas of focus and action. As it states:

“Reaffirming students at the heart of our academic mission, we will create an environment where every student, regardless of background, can flourish. Through our distinctive curriculum, underpinned by an outstanding on-campus experience, our students will take charge of their own learning, and develop the analytical skills and mindset needed for a rapidly changing world.”¹

We support and endorse this recommitment by senior leadership at the University of Melbourne, especially as the University scored poorly in the 2024 Student Experience Survey².

This recommitment by the University is an opportunity to ensure its policies that oversee disciplinary and integrity matters include safeguards for procedural fairness and empower the graduate researcher to respond and participate in any integrity matters.

How policy is written, interpreted and implemented has a direct impact on the student experience. Student success and engagement is directly influenced by institutional support, and the rules tertiary institutions adopt to govern themselves. Policy that does not centre or empower the graduate researcher experience can create an alienating force which reduces institutional trust within the graduate researcher population³.

We have grave concerns that the policy changes proposed for the Responsible Conduct of Research Policy by the Policy Office may further obfuscate processes for students facing questions of research integrity, erode the right to procedural fairness and may further entrench the imbalance of power between supervisors, the institution and graduate researchers by unnecessarily concentrating the decision-making power of this policy within the office of the Deputy Vice-Chancellor (Research).

We urge the Policy Office to take our recommendations seriously during this consultation period and slant policy provisions that govern research integrity matters towards protecting rights to procedural fairness for graduate researchers and empowering the graduate researcher in their relationships with their supervisors and the organisation.

¹ [Strategy 2030: Resilience](#), p 7.

² [2024 Student Experience Survey](#), Final Report, September 2025, p 24.

³ Daniela Pinto et al, '[Institutional Policies and Practices to Improve Access and Success in Higher Education: The Students' Proposals](#)' [2024] *European Journal of Higher Education* 1.

Summary of Recommendations

1. UMSU recommends that both the policy and any ancillary processes must be subject to formal consultation requirements. Graduate researchers must be included in the consultation process for all procedures that directly affect them.
2. UMSU recommends that all ancillary process documents should be subject to Academic Board oversight.
3. UMSU recommends that the policy should include a mechanism that prevents the DVC (R) from modifying the policy and any ancillary documents unilaterally without a formal consultation process.
4. UMSU recommends the establishment of clear timeframes and thresholds for training obligations to prevent unrealistic demands on graduate researchers.
5. UMSU recommends the implementation of formal processes to review training requirements with direct input from graduate researchers.
6. UMSU recommends incorporating provisions that comply with the University's inclusion requirements that provide extra support for graduate researchers with accessibility issues or facing equity-related barriers.
7. UMSU recommends that the draft policy should clearly define the phrase 'certain circumstances' and include safeguards to uphold privacy and procedural fairness by including prior notification to any graduate researchers before disclosure occurs and establish review mechanisms for disclosure decisions that graduate researchers can access.
8. UMSU recommends that the draft policy should clearly define the scope and powers of assessment offices to 'obtain information' and include the guarantee that graduate researchers can challenge information requests. The policy should include a provision for the support of an advocate during this process.
9. UMSU recommends that the draft policy should establish reasonable time limits for monitoring corrective actions and create a formal review process to prevent indefinite surveillance.
10. UMSU recommends that the draft policy should include clear provisions to prevent retrospective application of DATs by introducing grandfathering provisions for existing research, so current graduate researchers are not penalised for requirements introduced after the start of their candidature.
11. UMSU recommends that the draft policy should include further guidance and clarity for graduate researchers who wish to either quarantine their pre-enrolment research from University of Melbourne affiliation or wish to affiliate their pre-enrolment research with the University. The draft policy should also provide clarity in this space for researchers enrolled as visiting scholars or undertaking joint programs.
12. UMSU recommends that the draft policy should ensure clearly defined parameters for crediting and acknowledging authorship with community organisations and include a dispute resolution mechanism should disagreements arise about appropriate authorship attribution.
13. UMSU recommends that the draft policy should include explicit protections for graduate researchers who fail to report breaches due to fear or intimidation.
14. UMSU recommends that the draft policy must go beyond prohibiting victimisation by providing scope for an independent body to investigate matters involving retaliation against graduate researchers involved in reporting research misconduct.
15. UMSU recommends that the draft policy should provide clear compliance standards for protecting Indigenous knowledge and include mandatory support and training requirements for graduate researchers to ensure cultural sensitivity and to prevent unintentional breaches.

Separation of Policy and Breach Management Processes

The draft policy delegates critical breach management procedures to four separate 'process' documents (A-D) that will be approved by the Deputy Vice-Chancellor (Research) (DVCR) without formal consultation requirements or other governance oversight.

The Explanatory Memo provides that

These policies will be approved by the Deputy Vice Chancellor (Research). While not subject to formal consultation requirements per the University's Policy Framework (MPF1308), these processes are provided for information and context.

Effectively this means that graduate researchers lose the right to formal consultation on procedures that directly affect them. Additionally, the DVCR can unilaterally change investigation and penalty processes at any time, and the processes can be modified without accountability to the Academic Board and without student representation input. This represents an erosion of procedural safeguards where students facing allegations will be subject to processes they had no voice in creating or modifying.

Recommendations

1. Both the policy and any ancillary processes must be subject to formal consultation requirements. Graduate researchers must be included in the consultation process for all procedures that directly affect them.
2. All ancillary process documents should be subject to Academic Board oversight.
3. The policy should include a mechanism that prevents the DVCR from modifying the policy and any ancillary documents unilaterally without a formal consultation process.

Mandatory Training

The draft introduces mandatory training requirements determined solely by the DVCR. While UMSU acknowledges that training forms an important tranche of responsible research, however for the purpose of the policy which has material impacts on students' future careers, greater specificity is required. The current draft lacks:

- specification of time limits or reasonable thresholds for training requirements
- review mechanisms if training requirements become difficult or unsustainable
- consideration of training accessibility for students living with disabilities or facing other equity barriers.
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Recommendations

4. Establish clear timeframes and thresholds for training obligations to prevent unrealistic demands on graduate researchers.
5. Implement formal processes to review training requirements with direct input from graduate researchers.
6. Incorporate provisions that comply with the University's inclusion requirements that provide extra support for graduate researchers with accessibility issues or facing equity-related barriers.

Information Disclosure to Third Parties

The draft includes a new provision which acknowledges that while research integrity processes are managed confidentially, information may be disclosed to third parties in 'certain circumstances'.

This does not conform to the University's own proactive privacy and privacy by design commitment set out in its *Privacy Policy* (MPF1104) where the University commits to privacy protection by anticipating and preventing invasive events before they occur.

In this draft policy, there is no clear definition of 'certain circumstances' and there is no requirement to notify students before disclosure. Given the potential material impact this may have on the career prospects of graduate researchers, we would urge the Policy Office to include a review/appeal mechanism for disclosure decisions enshrining the rights graduate researcher have to procedural fairness.

Recommendation

7. The draft policy should clearly define the phrase 'certain circumstances' and include safeguards to uphold privacy and procedural fairness by including prior notification to any graduate researchers before disclosure occurs, and establish review mechanisms for disclosure decisions that graduate researchers can access.

Expanded Powers

The draft policy introduces several new powers where assessment officers and investigators are empowered to 'obtain information' without defining the limitations of these powers. There is not right for graduate researchers to refuse or change information requests. In addition, there is no scope for legal or advocacy representatives to assist with, and attend investigation meetings with graduate researchers.

In addition, there are no time limits on monitoring of corrective actions and there are no review processes for excessive monitoring, which removes the rights of graduate researchers to be able to challenge any of these processes that may greatly affect their future careers and further increases the power imbalance between graduate researchers and their mentors and supervisors. This has the potential to provide for indefinite surveillance of graduate research work.

Recommendations

8. The draft policy should clearly define the scope and powers of assessment offices to 'obtain information' and include the guarantee that graduate researchers can challenge information requests. The policy should include a provision for the support of an advocate during this process.
9. The draft policy should establish reasonable time limits for monitoring corrective actions and create a formal review process to prevent indefinite surveillance.

New Digital Assistance Technology (DAT) Requirements

New obligations require documentation of all Digital Assistance Technologies be kept in line with compliance protocols that are yet-to-be published.

There is no provision that limits the retroactive application of this requirement nor any sections that speak to grandfathering provisions for existing research placing current graduate researchers in a difficult position should they be required to present DATs without

being informed of this requirement at the beginning of their candidature or having received training on this requirement.

Recommendations

10. The draft policy should include clear provisions to prevent retrospective application of DATs by introducing grandfathering provisions for existing research, so current graduate researchers are not penalised for requirements introduced after the start of their candidature.

New Restrictions on University Affiliation

The new rules specifying detailed conditions for when University affiliation can or cannot be utilised can impact potential graduate researchers as it may place retrospective restrictions on pre-appointment research and restrict what graduate researchers can publish especially as it related to pre-enrolment work. Similarly, students wishing to attach University affiliation for pre-enrolment research may not be able to do so.

Additionally, there are no provisions that provide clarity regarding affiliation rights for graduate students that are visiting researchers or enrolled in joint programs.

Recommendations

11. The draft policy should include further guidance and clarity for graduate researchers who wish to either quarantine their pre-enrolment research from University of Melbourne affiliation or wish to affiliate their pre-enrolment research. The draft policy should also provide clarity in this space for researchers enrolled as visiting scholars or undertaking joint programs.

Community Engagement Requirements

The new requirements for graduate researchers engaging with community members includes treating those individuals and organisations contributing to the research fairly by giving credit, acknowledgment, and authorship where appropriate.

This statement is subject to interpretation and may provide space for community partners to claim authorship inappropriately, especially as graduate researchers are vulnerable to power imbalances with community organisations. There is also no reference to any clear dispute resolution mechanism should a disagreement arise in this area.

Recommendations

12. The draft policy should ensure clearly defined parameters for crediting and acknowledging authorship with community organisations and include a dispute resolution mechanism should disagreements arise about appropriate authorship attribution.

Mandatory Reporting Obligations and Insufficient Whistleblower protections

The draft policy requires that 'University staff, students, honorary appointees and academic visitors must notify OREI of potential breaches'. However, there are no protections for students who fail to report for fear or intimidation which does not consider the intense pressures of the power imbalance graduate researchers experience, especially if observing supervisor misconduct. Under the current draft provisions, failing to report creates a breach in of itself.

In addition, while the policy prohibits 'victimisation', it doesn't identify concrete enforcement mechanisms or any independent body to investigate retaliation or protection of graduate researchers from being subject to academic progression matters due to reporting supervisor misconduct.

Recommendations

13. The draft policy should include explicit protections for graduate researchers who fail to report breaches due to fear or intimidation.
14. The draft policy must go beyond prohibiting victimisation by providing scope for an independent body to investigate matters involving retaliation against graduate researchers involved in reporting research misconduct.

Expanded ICIP Requirements

While protecting Indigenous knowledge is crucial, and the new requirements are welcomed, the lack of implementation detail raises some concerns, including the lack of clear guidance on compliance standards which raises the potential for subjective interpretation of these requirements.

In addition, the draft policy does not include requirements to support graduate researchers to navigate these complex requirements. This is instrumental to avoid unintentional breaches due to lack of training in cultural sensitivity and safety.

Recommendations

15. The draft policy should provide clear compliance standards for protecting Indigenous knowledge and include mandatory support and training requirements for graduate researchers to ensure cultural sensitivity and to prevent unintentional breaches.

Conclusion

The proposed policy represents a concerning shift toward administrative discretion and away from transparent, consultative governance. While the explanatory memorandum frames this as promoting 'responsible research practices', the practical effect is to:

- **Concentrate power** in the DVCR office
- **Reduce transparency** in procedural development
- **Eliminate consultation requirements** for critical processes
- **Increase surveillance** and reporting obligations
- **Remove specific protections** for vulnerable researchers

To ensure fairness and accountability, the policy must not be approved without restoring the following procedural safeguards:

- **Right to representation** explicitly stated for all proceedings
- **Time limits** on all investigations and corrective action monitoring
- **Notification requirements** before any third-party disclosure
- **Grandfathering provisions** for research commenced under previous policy
- **Clear definitions** of all subjective terms and standards
- **Referral to advocacy service** for graduate researchers facing allegations
- **Academic progression protection** during investigations
- **Establish independent appeals body** separate from DVCR oversight

Additionally, we urge the Policy Office to restore formal consultation requirements for all breach management processes.

The delegation of breach management procedures to non-consultative 'process' documents represents the most significant threat to student rights. These documents will govern investigations, penalties, and appeals which are areas where students are most vulnerable. However, as it stands in the current draft provisions, they can be changed without any student input or Academic Board oversight.

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