

14 December 2022

RUN Submission to the Review of the Australian Research Council

The Regional Universities Network (RUN) welcomes the opportunity to comment on the Terms of Reference for the Review of the Australian Research Council. RUN is a national collaborative group of seven regional Australian universities: Charles Sturt University, CQUniversity Australia, Federation University Australia, Southern Cross University, University of New England, University of Southern Queensland, and the University of the Sunshine Coast.

How could the purpose in the ARC Act be revised to reflect the current and future role of the ARC?

The scope of research funding supported by ARC should be supported by legislation, without being overly prescriptive or inadvertently limiting potential future funding schemes. ARC funding schemes such as the discovery program and linkage program need to be free from legislation to allow flexibility for future changes and developments in line with the ARC supporting the production of the highest quality research possible across Australia.

As the national body that administers research funding grants (excluding medical) and that oversees research assessment, the ARC's role actively shapes research in Australia. The ARC has the potential to monitor, understand, advise, and report on the impact of research across Australia. RUN strongly recommends an aspect of the ARC's role be committed to championing Australian research. The ARC is best placed to advocate and provide guidance and expertise on research both within the Australian government policy context and internationally. Ensuring the ARC is responsible for promoting university research is vitally important as Australia's universities conduct research that enhance the productivity of Australia's industry, laying the groundwork for new innovative industries and processes that drive Australia forward. The advocacy role of the ARC to champion Australian research should be prescribed as part of the ARC Act and recognised as such.

Do you consider the current ARC governance model is adequate for the ARC to perform its functions?

RUN firmly believes in the importance of a strong and independent Australian Research Council. RUN is supportive of amending the ARC Act to strengthen the governance measures of the ARC. The proposal to re-establish the ARC Board has merit for the operational and strategic functions of the ARC, however, requires careful consideration to ensure the governance measures add value to the ARC without creating additional bureaucracy.

The proposed governance functions will add value to the effective functioning of the ARC. Other key attributes for strengthening the ARC's governance include transparency and accountability, with a defined scope for decision making. Any new governance measures should not include onerous administration or deter from existing ARC resources or investment. In the event the ARC Board is re-established and appointed by the Minister, RUN recommends the criteria for selecting Board Members ensure adequate representation from Australia's research sector, including regional representation, and that Board Members have a strong research background.

RUN is concerned about potential strategies and policies that advocate a one-size-fits all approach for research in Australia. Regional universities are recognised for hosting many highly successful and collaborative research clusters, however, there continues to be geographic imbalances in the distribution of national research funding, activities, and infrastructure. A revised ARC governance

model is an opportunity to include and consider research and innovation perspectives from across Australia. Regional representation is crucial for strengthening the ARC's governance.

How could the Act be improved to ensure academic and research expertise is obtained and maintained to support the ARC?

To ensure appropriate expertise is available to the ARC, RUN supports the development of guiding principles to be reflected in the Act, rather than the Act becoming overly prescriptive. The current practice of appointment of Executive Directors and the ARC's College of Experts does enable academic and research expertise to be used to support the ARC's activities. To strengthen this further, RUN recommends equitable representation from all disciplines within the ARC College of Experts. There are also opportunities to consider the integration of industry partners and experts, including into the Linkage Projects scheme, Selection Advisory Committee (SAC) memberships, and/or the ARC College of Experts.

It is important the ARC maintain a research grants process system where research grant applications are assessed utilising a robust peer review process. The utilisation of a peer review process in determining the success of research proposals is internationally recognised for the high level of rigor applied to the proposals by subject matter experts. In Australia, the grant application process is highly competitive and has, in part, resulted in the Australian research grant process having a substantial international reputation. This is reflected in the excellent research performance of Australia's universities on the global stage.

Should the ARC Act be amended to consolidate the pre-eminence or importance of peer review? the need for greater numbers of skilled migrants and

As outlined in the response to question 3, RUN strongly supports a system in which research grant applications and the allocation of research funding is decided by a rigorous peer review process where subject matter experts identify excellence in applications. RUN believes this system can be established via non-legislative measures, such as a guideline sitting within the ARC.

Please provide suggestions on how the ARC, researchers and universities can better preserve and strengthen the social licence for public funding of research?

The implementation of frameworks such as the National Interest Test provide a means to safeguard that scarce public funds are spent in the national interest. Having a quality assurance system in place, ensures that only the highest quality applications are funded and has led to Australia's stellar reputation for a strong, fair, and competitive research ecosystem that supports research, both basic and applied, across a myriad of disciplines. RUN supports initiatives that educate and advocate, particularly to those outside the Australian research sector, the high quality of work researchers and universities are undertaking while utilising public funding.

What elements of ARC processes or practices create administrative burdens and/or duplication of effort for researchers, research offices and research partners?

RUN supports the review of ARC processes and practices to reduce duplication and administrative burden, noting the organisational capacity within regional research offices varies to the resources available at larger metropolitan research institutions.

In addition to the feedback already received by the Panel, RUN notes the following areas for administrative improvement:

- Advanced notice or warning for new or changed processes or announcements.
- Reduce prescriptive financial and budget reporting processes.

- Review and streamline administrative tasks for submitting Expressions of Interest.
- Simplify the variations to grants procedures as they require significant coordination and time to prepare.
- Remove requirement for letters of support from the university for fellowship applications. This information is repetitive and can be included in other sections of the application.
- For international partner investigators (PI), reduce the repetition within the Research Opportunity and Performance Evidence (ROPE) statement; and simplify the foreign interference disclosures.
- Further guidance on how ARC processes and practices align with government policy

What improvements could be made:

- a. **to ARC processes to promote excellence, improve agility, and better facilitate globally collaborative research and partnerships while maintaining rigour, excellence and peer review at an international standard?**
- b. **to the ARC Act to give effect to these process improvements, or do you suggest other means?**

RUN recommends the ARC undertake genuine consultation with the sector inform the ARC's implementation of acceptable timelines. This improvement will increase agility and better facilitate more effective working practices within institutions. It will enable the sector to understand what activities and scope of work are required, and with advanced notice can plan and allocate resources accordingly. Reducing bureaucracy and excessive administrative procedures are further improvements that can be achieved with advanced communication and implementing acceptable timelines.

Improvements to ARC processes can be achieved through management and governance initiatives, rather than prescribing such items within the ARC Act. RUN recommends resources such as guidelines or procedures be developed and reviewed to sit within the ARC to further improvements, set standards, promote excellence, and increase agility and engagement across sector.

In considering international excellence and to ensure the Australian research system is well supported to produce the highest quality research, RUN proposes the ARC refer to the Independent Review of Research Bureaucracy that was commissioned by the UK Government. The final report was released in July 2022 and provides several compelling recommendations for improvement. There are opportunities to consider this report in the Australian context, including the seven principles for cutting unnecessary bureaucracy: harmonisation, simplification, proportionality, flexibility, transparency, fairness, and sustainability.

RUN strongly supports the review and implementation of processes and technologies that provide simple and streamlined solutions for the sector, including the removal of complex application processes and unnecessary bureaucracy. The final report for the UK's Independent Review of Research Bureaucracy provides various recommendations that can be considered by the ARC. RUN notes the opportunity for process improvement, by reviewing how grants are awarded. The final report suggests funders trial different application processes to reduce burdens for applicants, including the concept of a two-stage application process – where the information and details required would increase with the likelihood of being funded. This two-stage funding application process is already utilised by other state and federal government grant funding schemes in

different sectors across Australia. RUN recommends the ARC trial a two-step funding application process, to reduce unnecessary or complex administrative procedures currently tied to research grant application processes. RUN recommends consideration be given to aligning the digital platforms used by the ARC, to provide the sector with a consistent approach to streamline different functions including but not limited to grant applications, data collection, and understanding the impact of Australia's research investment.

RUN commends the Minister for Education for acknowledging the importance that all future grants rounds are delivered on time, to a pre-determined timeframe. RUN also commends the ARC for publishing the 2022/23 grants calendar for the remainder of financial year and recommends this advanced notification of upcoming announcements and application timeframes be continued going forward.

With respect to ERA and EI:

- a. **Do you believe there is a need for a highly rigorous, retrospective excellence and impact assessment exercise, particularly in the absence of a link to funding?**
- b. **What other evaluation measures or approaches (e.g. data driven approaches) could be deployed to inform research standards and future academic capability that are relevant to all disciplines, without increasing the administrative burden?**
- c. **Should the ARC Act be amended to reference a research quality, engagement and impact assessment function, however conducted?**
- d. **If so, should that reference include the function of developing new methods in research assessment and keeping up with best practice and global insights?**

RUN supports the use of frameworks that identify, promote and drive excellence and impact across the full spectrum of research activity occurring across Australia's research institutions. The purpose and implementation of retrospective assessment exercises that are not linked to funding, requires careful consideration to ensure any process is not burdensome or complicated. If peer review is to be used, RUN recommends a robust and transparent blind peer review process be considered.

RUN supports amending the ARC Act to reference a research quality, engagement, and impact assessment function. This amendment would guide the strategic and policy setting for the ARC and its future governance structure.

To ensure Australian research efforts continue to be recognised and to drive high quality research RUN supports the ARC implementing new methods for research assessment that align with contemporary international practices and global insights to the extent that they are relevant.

With respect to the ARC's capability to evaluate research excellence and impact:

- a. **how can the ARC best use its expertise and capability in evaluating the outcomes and benefits of research to demonstrate the ongoing value and excellence of Australian research in different disciplines and/or in response to perceived problems?**
- b. **what elements would be important so that such a capability could inform potential collaborators and end-users, share best practice, and identify national gaps and opportunities?**
- c. **would a data-driven methodology assist in fulfilling this purpose?**

As the national body that administers research funding and collects data on all these research grants, the ARC is best placed to champion and demonstrate the value of Australian research including its excellence and impact. RUN recommends a national strategic reporting format and timeframe be considered which may include a biannual or 3-to-4 yearly report presented to the

Minister from ARC, with the purpose of highlighting the impacts of Australia's research, including the impacts on areas of industry productivity and innovation. The ARC should investigate strategies to utilise technologies and tools available to further educate and champion the significance of Australia's research quality and impact.

For the ARC to drive the strategic importance of Australia's research, there are opportunities to develop a specific program of work with which the ARC evaluates the outcomes of its grants to demonstrate value and excellence of ARC-funded research. This program of work also establishes the environment to increase and expand best practice across domains, while meeting the needs of government stakeholders and informing policy.

Implementing a data-driven methodology will assist in removing administrative burden and provide a meaningful set of criteria across sector. RUN notes a steering group has been established to consider this topic. RUN is open to exploring data-driven methodologies and looks forward to working with the steering group as consultation progresses.

Having regard to the Review's Terms of Reference, the ARC Act itself, the function, structure and operation of the ARC, and the current and potential role of the ARC in fostering excellent Australian research of global significance, do you have any other comments or suggestions?

RUN welcomes opportunities to increase and improve the ARC's engagement with regional institutions. While acknowledging that regional areas are not as easily accessible as metropolitan locations, RUN universities host many highly successful and collaborative research clusters who are recognised as performing at, above or well above world standard in multiple key research areas. Meaningful engagement with regional institutions is imperative for the ARC to fully understand and champion Australia's research capabilities.

Regional Australia and its universities must play a lead role in reshaping Australia's industries, technologies, and workforces for the transition to a 'green economy' and net zero emissions by 2050. The ongoing sustainability of regional universities as accessible, equitable, and high-quality providers of teaching and innovative research is crucial. RUN has previously called for the establishment of a dedicated regional research fund that seeks to build regional Australia's understanding of, and ability to respond to, the opportunities and challenges of the net zero energy transition. This research would not only drive capacity for regional innovation and resilience, but also inform the teaching and training of transitioning regional workforces. For the ARC to understand and support this strategy, increased active engagement with regional universities is essential.

As outlined in the response to question 7, RUN welcomes the trial of a two-step ARC funding application process, to reduce unnecessary or complex administrative procedures currently tied to existing research grant applications. The trial will provide useful insights from the funder and applicant perspectives, to help determine if it is an effective alternative to the current process.

It is in the national interest to have a strong, independent research granting agency. RUN notes that the ARC has recently appointed a new CEO and series of Directors. It would be beneficial for the ARC, in the future, to frequently reflect on their organisational structure and determine if it still appropriate to carry out its mission, and question if they continue to have the capabilities and resources in place to carry out the role as defined or will be defined in the Act.

As part of the Tertiary Education Quality and Standards Agency's (TEQSA) threshold standards framework, Australian universities have set threshold levels they must demonstrate for their breadth and quality of research. ARC's ERA demonstrates that excellence in research happens

across the country regardless of the size of the institution. RUN notes the interdependency between the two frameworks, and recommends that ARC and TEQSA met to determine how the threshold standards and any changes to ERA will work in practice.