

Review of the Australian Research Council Act

Response to the consultation paper

Introduction

On 30 August 2022, the Hon Jason Clare MP, Minister for Education, announced an independent review of the ARC Act to consider the role and purpose of the ARC within the Australian research system so it can meet current and future needs and maintain the trust of the research sector.

The Expert Panel appointed to undertake the Review issued a consultation paper which included specific questions respondents were asked to address. The Expert Panel will deliver an interim report to the Minister for Education by 31 December 2022, with a final report with recommendations due by 31 March 2023.

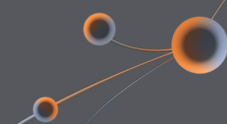
Research Australia is the national alliance representing the entire health and medical research (HMR) pipeline, from the laboratory to the patient and the marketplace. Research Australia works to position Australian HMR as a significant driver of a healthy population and a healthy economy.

Research funding from the Australian Research Council (ARC) is relevant to Research Australia's membership because, while the ARC does not fund 'medical research', the ARC funds much of the basic research that underpins health and medical research, as well as supporting the broader research ecosystem.

Research Australia's submission

Responses to the consultation were sought by electronic survey. Research Australia's responses were directed to specific questions relevant to our membership. Research Australia's submission was lodged on 14 December 2022. The survey questions addressed by Research Australia and responses are reproduced below.

Research Australia acknowledges the contribution of Research Australia member, Asthma Australia, to this submission.



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

For example, should the ARC Act be amended to specify in legislation:

- a. the scope of research funding supported by the ARC;
- b. the balance of Discovery and Linkage research programs;
- c. the role of the ARC in actively shaping the research landscape in Australia; and/or
- d. any other functions?

If so, what scope, functions and role?

If not, please suggest alternative ways to clarify and define these functions.

Response:

Research undertaken in higher education is funded from a range of different sources. Even within the Commonwealth Government, funding is provided by a many different agencies and programs from numerous portfolios. These include, for example, the NHMRC and MRFF (Health Portfolio), the Cooperative Research Centres Program (Industry, Science and Resources) and Defence. While each provides valuable funding, these sources have grown independently; each program has its own goals and eligibility criteria with little inter-scheme coordination, resulting in duplication of effort and inefficient allocation of funding in some places.

Funding from each program affects the overall mix of research undertaken in our universities. This, in turn, influences the mix of skills and capabilities in our research workforce and the type and location of research infrastructure that is required.

The ARC has programs which help respond to these pressures and needs, such as the Industrial Transformation Training Centres. What is not evident is how the ARC considers these external funding sources. The tendency for all Government research funding programs, from numerous portfolios, to operate in isolation from each other leads to a fragmented research funding ecosystem. This situation could be improved, in part, by the ARC developing a strategy which takes into account the other sources of research funding.

Research Australia is not suggesting this doesn't happen to some extent already, but we are proposing that the Act should be amended to explicitly describe the ARC's role in, as the question above says, 'actively shaping the research landscape in Australia'. The development of Strategy should include consultation with universities, the research community, industry and the public.

Research Australia submits that the ARC Act should be amended to require the CEO of the ARC to develop a strategy for the ARC's funding programs and support for higher education research. In developing the strategy, the Act should explicitly require the CEO to consider the existing funding provided from other sources, with

the aim of ensuring the continuing vibrancy, viability and relevance of the Australian higher education research sector.

Should the ARC Act be amended to consolidate the pre-eminence or importance of peer review? Please provide any specific suggestions you may have for amendment of the Act, and/or for non-legislative measures.

Response:

Research Australia accepts the right of the Government to set the criteria for research funding programs, including the eligible applicants and research areas, and the amounts of funding available.

Research Australia does not believe the Minister should have the power to refuse to fund individual research proposals that are recommended by the CEO of the ARC under an approved funding program.

The assessment of individual funding proposals is best undertaken by individuals with expertise in the subject matter area, and this is the case with the assessment process employed by the ARC. While recognising that it has a long history of more than a century and has been subject to change, Research Australia supports the Haldane Principle as stated in the UK's Higher Education and Research Act 'that decisions on individual research proposals are best taken following an evaluation of the quality and likely impact of the proposals (such as a peer-review process).' [Higher Education and Research Act UK 2017, section 103]

Research Australia supports amending the ARC Act to remove the Minister's responsibility under section 53(4) of the Act for deciding which individual research proposals should be approved for funding.

In relation to non-legislative measures, providing the public and early career researchers with greater visibility of the peer review process would support better understanding of research processes and help increase public understanding of, and support for, the ARC's research programs. This could include inviting observers to peer review processes and /or publishing materials for a general audience which explain the peer review process, the advantages of peer review, its history and how it is used internationally.

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

Response:

Open Access publishing has the capacity to preserve and strengthen the social licence for publicly funded research. Currently, research funded by Australian taxpayers cannot be accessed by them. While not all Australians want to read or engage with published research there is a significant group who would like to do so and are currently regularly confronted by paywalls.

The move to Open Access publishing provides the opportunity to make research available in different formats, and to provide summaries and more accessible versions of research across a field. Clear and unambiguous support for Open Access publishing and for Open Data from the ARC is a key way the ARC can preserve and strengthen the social licence for public funding of research.

The ARC should provide support for open access, through policies and also by supporting the infrastructure that enables research to be made open. In the Australian context that should include university repositories, local no-fee open access journals and the technical infrastructure that supports these approaches.

As the range of research outputs continues to evolve, it is essential the ARC provide leadership in reforming research assessment beyond its current state which is based primarily on journal-based metrics to encompass other outputs.

Citizen Science is a growing trend and has the potential to improve science as well as community engagement with science. Specific support for citizen science by the ARC is another way of improving the social licence for publicly funded research.

Research Australia submits the ARC Act should be amended to provide a commitment to Open Access to the research fundings and outputs of ARC funded research.

Research Australia submits the ARC Act should be amended to create a positive obligation on the ARC to support the dissemination and promotion of Australian publicly funded research.

Research Australia submits the ARC Act should commit the ARC to engaging the Australian community and recognise the value in engaging the public in the conduct of research.

The ARC can play a greater role in showcasing research it funds and explaining its value and relevance to the Australian public. The National Interest Test statements should be a useful starting point for this work. The ARC can also support researchers in their own efforts to publicise their research to a general audience, and develop resources for use by media outlets on research topics and the research process.

The outcome the ARC should seek to achieve is an increase in research literacy in the Australian public and a greater understanding of the research plays in all our lives- through better health and social outcomes, new technologies and changes to government policy.

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?**

The ARC strategy should be informed by Government policies and programs in other areas, including 'downstream' from research, such as the National Reconstruction Fund and the Australia's Economic Accelerator. The ARC's objective could be to identify 'gaps' that exist between its own programs and other Government initiatives, and what appropriate actions the ARC can take to help close these gaps. For example, how can the Linkage Program support researchers to utilise the Australian Economic Accelerator?

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?

Response:

Research Australia proposes the ARC investigate the opportunity to utilise AI to design and support robust application and assessment processes, and engage Australia's own research community in their development and design.

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