



Review of the Australian Research Council (ARC) Act 2001

The University of the Sunshine Coast (UniSC) welcomes the opportunity to provide a submission to the independent review into the Australian Research Council Act 2001 (ARC Review).

With five campuses from Moreton Bay to the Fraser Coast in Queensland, UniSC is a rapidly growing, comprehensive university focused on excellent teaching, ground-breaking research, championing sustainability, and producing award-winning alumni. We're one of Australia's highest-rated public universities in key areas of overall experience, skills development, student support, teaching quality, social equity, first generation, learner resources (undergraduate and postgraduate) and learner engagement (postgraduate). Our research explores the timeliest topics of our era, those with the most significance for the future, with a focus on environmental impact, mental and medical health, technology, and human behaviour.

UniSC is a strong supporter of the ARC and the critical role it plays in funding competitive peer reviewed research and research training that benefits all Australians. With the passage of over 20 years since the ARC Act was legislated, it is timely to consider whether the enabling legislation remains fit for purpose in a rapidly changing domestic and global economy. We acknowledge this review does not cover the administrative activities of the ARC, including grant processes, program reviews and funding, and that this is being separately considered via an updated Letter of Expectations from the Minister.

If you would like to discuss UniSC's views further, we invite you to contact Professor Ross Young, Deputy Vice-Chancellor (Research and Innovation), UniSC at DVCRsearch@usc.edu.au.

1. Scope and purpose of the ARC

UniSC is supportive of the Act being amended to specify a balance of basic and applied research and ideally that the ARC needs to have an active role in research advocacy.

We know that the Australian economy must better utilise our innovation ecosystems to drive leadership in key industries and increase our economic diversity. Our present economy is overly reliant on raw materials, particularly in mining and agriculture. However, evidence shows that Australia performs well above its size in terms of academic excellence.

In recent times, the Government has implemented a range of initiatives to encourage further industry engagement in research and innovation and to remove real and perceived barriers. The ARC remains a key mechanism to clearly and consistently measure research impact, facilitate research co-investment from government, industry, and the research sector, manage schemes that drive the direct application or uptake of research findings in industry.

2. Governance and management

UniSC believes there is merit in re-establishing a Board to improve ARC governance consistent with the suggested approach in the consultation paper, however, this would inevitably increase the administrative burden in an already resource constrained organisation, i.e. the secretariat functions required to support an effective Board. Therefore, additional resourcing would need to be provided so as not to distract existing ARC officers from their core deliverables.

The current legislation does not require the CEO to have a research background and thus it is left to the Minister to consider a candidate's expertise when making appointments. UniSC suggests the functions of the CEO as set out in the legislation require a strong research background.

There is also an argument that the legislation should provide the ARC CEO with a higher level of independence and protection from political interference, including stronger dismissal protections.

3. Academic expertise and peer review

The current practice of appointment of Executive Directors and the ARC's College of Experts does maintain and ensure that academic and research expertise is used to support the ARC's activities.

The only aspect UniSC believes would strengthen this process is the use and integration of industry partners into Linkage program scheme Selection Advisory Committee memberships and into the College of Experts.

It is critical that the Act maintain the peer review process.

4. Grant approval

UniSC strongly supports the role of peer assessment and believes the Act should be amended to consolidate the pre-eminence or importance of peer review.

In addition, consideration should be given to assessors including more potential end users who should include those who will consider the ideas in the context of their business or organisations and ideally receive the benefits.

With respect to Ministerial discretion to intervene and/or overrule ARC recommendations, UniSC believes this power should be removed by amending the Act. If it is retained, then the Act should require the Minister to provide a detailed explanation to Parliament, particularly decisions related to the National Interest Test.

5. National Interest Test

UniSC is supportive of the intent and social licence benefits of the National Interest Test.

We acknowledge the recent changes to the National Interest Test that give responsibility to Deputy Vice-Chancellors (Research) to approve the statements at institutional level and that those statements will be used by assessors in the peer assessment process

However, we believe the National Interest Test process, which is separate to the assessment process, could be further improved and we are supportive of the consultation paper suggestion that "The astute use of national benefit provisions in the selection criteria may be appropriate."

6. Administrative burden

UniSC acknowledges the actual or perceived administrative challenges outlined in the consultation paper and would welcome amendments to the Act or ARC governance arrangements that dealt with these issues.

We also note that variations to applications are complex and time consuming to prepare, review and receive approval for.

Finally, we recommend removing the requirement for letters of support from the applying university (in fellowship applications). The extraneous information could instead be included in relevant sections of the application (e.g. D2), otherwise, it is fairly repetitive.

7. Process improvements

UniSC welcomes the move by the ARC to publish its grants calendar for the remainder of the 2022-23 financial year.

As the Panel may be aware, the UK government recently commissioned an independent review of national research support with a final [report](#) delivered in July 2022. This report delivered some compelling findings that are relevant to Australia as we contemplate similar issues in our research ecosystem, including the following seven principles for cutting unnecessary bureaucracy:

- Harmonisation - Reducing the volume of administration through the use of common processes between different funders to make essential work easier.
- Simplification - Reducing the complexity of individual processes to address unnecessary bureaucracy.
- Proportionality - Ensuring that the obligations placed on researchers and institutions are commensurate with the size of the risk or reward.
- Flexibility - Supporting and embracing excellence wherever it is found and not excluding research that does not fit within narrowly defined parameters.
- Transparency - Communicating the rationale for systems and processes which have a bureaucratic burden.
- Fairness - Developing approaches to systems and processes that support fairness, rather than erode it.
- Sustainability - Cutting bureaucracy in ways that avoid destabilising the system to deliver a more efficient system over the long term. For example:

With the above principles in mind, UniSC makes the following process improvement recommendations:

- All grants become a two-step process, where an initial concept note or “Expression of Interest” is created, with an invitation to develop a full proposal in the second stage if the concept note is approved.
- The notion of eligibility should be reconsidered, i.e. a world class proposal should not be rejected due to not meeting very strict compliance requirements. For example, rejecting a proposal due to minor formatting discrepancies such as margin or font size is not seen as supporting good science. Readability and conceptual soundness should be emphasised in assessing application quality.
- Consider a whole of government approach to harmonise digital platforms to assist applicants and government stakeholders to have a more consistent approach. This will allow greater applicant agility in navigating the application process and is especially important if more end users are engaged in the application process.
- Leveraging the whole of government harmonised digital platform approach, ensure data is submitted once and can be used for multiple purposes. Research data is critical, not just for research providers but also for government to understand the impact of its investments. Currently, higher education providers must submit multiple data collections to the ARC and other areas of government.

8. ERA and EI

UniSC understands there is value in measuring the impact and excellence of Australian research and ensuring quality over quantity.

However, we agree with the proposition in the consultation paper that the ERA has driven a stronger focus on quality research and given the significant administrative burden on institutions and the ARC, it should be discontinued and replaced with a greater value for money assurance process.

With respect to alternative options for evaluation measures or approaches, there are a range of commercial products that could be considered and assessed for suitability.

UniSC believes that the Act be amended to reference a research quality, engagement and impact assessment function and that reference should require the ARC to keep pace with international best practice.

9. Evaluation capability

UniSC agrees that, irrespective of the future of the ERA, there is merit in evaluating research excellence and impact to demonstrate its value to the public, government, policymakers, and industry.

Whatever process is determined, we recommend it maintain the following principles:

- Comprehensive
- Focus on excellence and accuracy
- Connected to other data
- Automated where possible

10. Other comments

UniSC notes that in the UK [model](#), they have split research and innovation but included both 'streams' under one administrative umbrella. We suggest this approach be considered in terms of how the Australian Government approaches the research funding landscape.