

ASA submission to the Review of the Australian Research Council Act

Discussion Draft

Feedback for the review is via a web form. The questions are given below, as are the proposed responses from the ASA. For more information, consult the Review of the ARC Consultation webpage (<https://www.education.gov.au/higher-education-reviews-and-consultations/review-australian-research-council-act-2001>) and the paper (<https://www.education.gov.au/higher-education-reviews-and-consultations/resources/review-arc-consultation-paper>).

1. Scope and Purpose of the ARC

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.

The ARC plays a crucial role in many aspects of the Australian Research sector. It is the main funding agency for fundamental research, via the Discovery Program, and hence it is critical for astronomical research funding. We remind the Review that without the fundamental research being performed, there is no applied research or application down the track. Further, justifying basic research in terms of later applications is short-sighted and simply impossible for some of the more revolutionary research: even at the time, later applications could not be foreseen (e.g. general relativity corrections included in all mobile phones for GPS application).

A balance between Discovery and Linkage is crucial, but it is the role of the ARC to ensure that the Discovery programs receive appropriate funding and attention, especially in view of the short-term views of most governments seeking rapid financial return. If the balance is lost, then there will be no commercial application in the future, and Australia becomes a user of the intellectual property of other wiser nations.

The ARC CEO (and perhaps members of a newly formed Board) should be more actively involved in research policy and planning. Perhaps the roles of these positions in advisory bodies can be identified in a revised Act.

2. Governance and Management

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

If not, how could governance of the ARC be improved? For example, should the ARC Act be amended to incorporate a new governance model that establishes a Board on the model outlined in the consultation paper, or another model;

Please expand on your reasoning and/or provide alternative suggestions to enhance the governance, if you consider this to be important.

Recent years have seen a substantial increase in political interference in the work of the ARC. We see this review as an opportunity to strengthen the independence of the ARC. We would like to see an ARC Board reinstated, that can serve as an advisory body for the appropriate Ministers. The ARC Board should appoint the CEO, rather than the Minister. This CEO must have extensive research and management experience, having worked within the system so that they are familiar with the problems.

The Board should include the ARC CEO (separate from the Chair of the Board) as well as members who represent many different disciplines from the Australian research landscape. Industry research leaders should be included but should not dominate, due to their distance from the fundamental

research that drives opportunities for later application. The form outlined in the Discussion paper seems very appropriate to us.

3. Academic expertise and peer review

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

How could this be done without the Act becoming overly prescriptive?

Academic expertise is critical to the functioning of a research body, especially for the more fundamental disciplines. Peer review, as a principle, is the best system we have for evaluation (although we recognise that it has imperfections). The ranking of proposals should involve discipline-specific panels, rather than the exceptionally broad panels currently used. To reliably assess proposal quality on more than a superficial level, it is crucial to obtain the services of international assessors. We expect that there will be a higher rate of acceptance from international reviewers if the proposal format is more in line with international standards in terms of length and content. Appointing academic discipline leaders is critical, and a way of enshrining that structure, without being overly prescriptive, is worth pursuing. We note also that industry leaders and experts should not be involved in evaluating fundamental research, such as proposals under the Discovery programs.

4. Grant approval

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.

The Haldane principle should be the guiding principle for funding. We join the vast majority of researchers in calling for removal of the Ministerial veto from the act. Research funding decisions are out-sourced to the ARC and no individual can possibly be sufficiently knowledgeable to overrule that process. This would put us in step with the rest of the international research sector. It also removes the potential (tending to become real in recent years) of political and ideological interference in the research funding decisions.

If the Minister is to take responsibility for the expenditure of public funds, then some oversight is indeed appropriate. If the Minister is unhappy with some decisions then these concerns should be raised with the ARC Board and discussions can take place there which confront the Ministerial concern with the ARC recommendations. If agreement cannot be found then perhaps a separate body needs to be formed for making a decision. However, it should never be a single individual who has the power of veto.

5. National Interest Test

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

We believe that the NIT serves no useful purpose. The entire proposal review process involves evaluating the research from many views, including national interest, as viewed more widely than the current NIT.

Perhaps something addressing potential impact might be more useful – this could include industry applications but may also affect culture and policy making. However, we repeat that in many cases of basic research, the impact may be enormous but impossible to predict at the time of the proposal.

6. Administrative burden

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

The current system is bloated, tedious, and risk-averse. Substantial changes to rules seem to occur with little consultation and they can have huge impacts on the research community (e.g. the disallowing of reference to pre-prints and white papers). The proposals are far too large, ROPE sections produce tens of pages that are of little use in evaluating a proposal, but take time to prepare and check and then review. The onerous requirements for Partner Investigators are usually met with incredulity, especially in view of the fact that they receive no direct funding.

The ASA believes that a Discovery or Linkage proposal can be argued in as few as 4 or 5 pages, rather than 10. An appropriately chosen reviewer will know more about the proposers than is captured in a ROPE section that takes ages to compile. Rather, we suggest that a brief (2 pages?) CV is all that is required – and it is up to the applicant to decide what they include. Perhaps something more in line with the NSF biosketches is appropriate. However it is done, the applications need to be made smaller because at the moment they are an overly onerous task to compile as well as evaluate. We are familiar with many international assessors who refuse to read such long applications, thus removing from the evaluation process the very individuals who are most desired.

7. Process improvements

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?

Please include examples of success or best practice from other countries or communities if you have direct experience of these.

The ASA supports the recent changes to the timeliness of the grant outcomes reporting. These changes should be applied to all ARC programs so that there is some certainty for timelines. There should be complete clarity on these timelines and the dates by which decisions will be finalised. These should not be “flexible” except in extreme circumstances.

[BM: I would favour bringing back eligibility caps (e.g. 1-2 slots at a time across CE, DP program) to increase the success rate of DPs to 25% or more. Experience shows that proposal selection becomes very random and unattractive when success rates drop significantly below 30%. Low success rates also tend to put off good researchers (a EU officer mentioned this explicitly in a presentation on the Horizons program).]

8. ERA and EI

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?

The ERA is an exceptionally costly exercise with very little benefit. We favour its removal.

9. Evaluation capability

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?

ASA comments go here

10. Other Comments

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?

ASA comments go here