

## Review of the Australian Research Council, December 2022

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**The Australian Academy of the Humanities is the national body for the humanities in Australia. As one of the nation's five Learned Academies, we are a unique resource for government, working to ensure cultural, creative, and ethical perspectives inform Australia's plans for now and the future.**

### Introduction

A review of the Australian Research Council (ARC) Act is overdue. This has been necessitated most recently by the loss of sector confidence in the ARC's governance and management, and the ways in which the Ministerial veto powers and the application of the National Interest Test (NIT) has politicised its grants approvals processes.

The Academy welcomes the opportunity to contribute to this process. Over decades, the Academy has worked collaboratively with the ARC, partnering on outreach activities to facilitate humanities engagement with ARC programs; we've been the recipient of funding through the Learned Academies Special Projects Scheme; and we've responded to reviews, consultations and requests for advice.

We believe it is in everyone's interests to have a strong ARC with a renewed reputation for delivering programs with integrity and innovation.

This submission draws on several of our earlier contributions to relevant reviews and consultations (see Appendix A). We consulted with our Fellows and wider humanities networks, many of whom have extensive leadership experience at the ARC (as College of Experts members, panel chairs and members (including of the ERA and EI exercises), and former Advisory Council members), with the newly established SHAPE Futures EMCR Network,<sup>1</sup> and exchanged advice with the other Learned Academies.

The Academy would be happy to convene further input and access to humanities' expertise and advice.

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<sup>1</sup> See <https://shapefutures.com.au>

## Scope and purpose of the ARC

### Q1: HOW COULD THE PURPOSE IN THE ARC ACT BE REVISED TO REFLECT THE CURRENT AND FUTURE ROLE OF THE ARC?

The Academy of the Humanities **supports the unique role of the Australian Research Council (ARC) as the principal source of merit-based funding for non-medical research in Australia**, supporting excellence in research across all fields and across a spectrum of research activities. Alongside its medical counterpart – the National Health and Medical Research Council (NHMRC) – the ARC is the lynchpin in Australia’s pursuit of competitive advantage and world-class outcomes from research.

The **single most important function of the ARC is supporting fundamental research across the disciplines**. This is the ARC’s unique role in the system, no other agency performs this function. It is this support for fundamental ‘basic’ research across all research fields – the humanities, arts and social sciences (SHAPE)<sup>2</sup> and science, technology, engineering and mathematics (STEM) – that gives the research and innovation system its core capacity. It provides the platform for multidisciplinary approaches to problem-based research, and ultimately enables Australia to identify emerging opportunities in its global engagements and to prepare for and respond to unforeseen societal challenges.

**The ARC’s commitment to supporting high-quality pure basic research needs to be explicit in the Act.**

As a publicly funded research agency with a national remit, the ARC should inform strategic priorities for research of benefit to the nation, innovate on program design, and build enduring research capability for Australia.

The Terms of Reference for the ARC Review correctly point out: “Successive governments have wanted to see demonstrable value for research investment and that areas of national significance are adequately funded and reap dividends for society and the economy.”

It is important that these goals are not interpreted in a way that makes it difficult to secure funding for the pure basic research on which applied research depends. Given constant government-imposed changes of policy and focus, there is a growing perception amongst researchers that ARC Discovery projects now need to have a substantial applied content to be competitive for funding. As the Consultation Paper rightly acknowledges, “The ARC also plays a critical role in having a component of its funding dedicated to Discovery or fundamental research.” An explicit emphasis on this needs to be retained.

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<sup>2</sup> SHAPE is a new collective term to describe the humanities, arts, and social science disciplines, and originated from a coalition of organisations in the UK, including the British Academy, the London School of Economics, and the Arts Council England. It’s the new name for the SHAPE Futures Network for early and mid-career researchers in the humanities, arts and social sciences, see <https://shapefutures.com.au>

**In terms of legislative change**, we agree that the ARC Act should be amended to specify in legislation:

1. The scope of research funding supported by the ARC, to make explicit that: **The ARC supports excellent research across all disciplines (with the exception of health and medical research funded by the NHMRC).**
2. The balance of Discovery and Linkage research programs has been a major cause for concern over the last ten years. The encroachment of applied and commercial research funding has come at the cost of fundamental research. The Academy is supportive of a form of words which specifies that: **The ARC supports pure basic, strategic basic and applied research through its grant programs, and that, a dedicated proportion of ARC funding supports fundamental research (through the Discovery program).**

The current ARC Act specifies that the Minister must divide funding caps between different categories of research programs. We think there is a case for this to be **as high as 75 per cent annually for Discovery, and certainly no less than 50 per cent**, to recognise and reinstate the value of fundamental research.

3. In terms of the role of the ARC in actively shaping the research landscape in Australia, **we agree that the ARC has a leadership role which should be made explicit in the ARC Act. This would reinforce the need for proper governance and signal the skills, capabilities and experience required of the CEO of the ARC.**

We suggest that the public good and national benefit are expressed not only in the research the ARC funds, but in its leadership role across the sector in the following areas:

- a. **Building research capability** – providing support for underpinning infrastructure, research training, and workforce development, especially for early and mid-career research cohorts.
- b. **Leading and driving cultural change and transformation to:**
  - i. support Indigenous Knowledge and research
  - ii. address gender equity and workforce diversity
  - iii. ensure Australia's publicly funded research meets FAIR and CARE principles<sup>3</sup>
  - iv. embed research integrity and responsibility.
- c. **Facilitating international collaboration and engagement.**
- d. **Collecting and sharing data and analyses** to inform sector understanding and decision-making.

<sup>3</sup> FAIR: <https://www.go-fair.org/fair-principles/>; CARE: <https://www.gida-global.org/care>

- e. **Advising and consulting on research priorities** with the Minister and the sector to ensure that priorities reflect deep knowledge of how research works, and that programs are meeting needs.
- f. **Engaging with the sector** on current schemes, design of schemes, improvements to application processes, ways to ensure processes are more transparent – to encourage confidence in the agency.

The ARC Act should not specify these functions too prescriptively. There needs to be the ability to change in response to new priorities and circumstances as the ARC has effectively done in the past.

## Governance and management

**Q2. 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?**

**No. The ARC lacks an effective governance structure that engages key sector stakeholders and provides robust advice to the CEO.**

To function effectively and credibly, the ARC needs the trust of the Minister but also the higher education and research sector and stakeholders. Over the last five years, the ARC has lost credibility and sector trust. Leadership and governance are the big issues needing redress.

The current situation has been exacerbated by resource constraints and under-funding. We acknowledge this is out of scope of this review but needs to be understood if the necessary reforms are to be made and sustained.

We **agree that the ARC Act should be amended to include the mission, membership and operation of key committees such as the ARC Advisory Committee** (cf. NHMRC) to ensure transparent, accountable and effective governance as free as possible from political interference. The role and function of the ARC Advisory Committee needs to be revamped and its terms of reference strengthened. **The Board model has merits, and we would be supportive of functions along the lines outlined in the Consultation Paper.** The **Board needs to have explicit guidelines for including representatives of the research community across all of the disciplines.** The most important stakeholders in the ARC's management of the research system are the researchers, so the Board needs to include actual researchers. This is a diversity dimension of its leadership and expertise, which goes to the heart of organisational culture.

When the new Advisory Council structure was announced by the former Minister on 31 March 2022, there was no humanities representative. We wrote to the then Minister to outline our concerns that the lack of humanities leadership and representation at the highest levels of the ARC jeopardises the quality and authority of this Committee's advice. That this appointment was only made after advocacy and a change of government means that 'going forward' the guidelines for the composition of the

Advisory Committee or a Board needs to explicitly mandate research leadership from across the disciplinary spectrum in its membership.<sup>4</sup>

**The ARC CEO’s experience and profile should reflect the ambitions we have for the ARC itself and to ensure the ARC has the leadership profile and culture to engage, challenge and support the broader research community and be an effective advocate with the Government.** We support the position outlined in QUT’s submission to the Senate Education and Employment Legislation Committee Inquiry in February 2022 that the CEO needs to have research leadership experience along with a demonstrated vision for developing the sector.<sup>5</sup> This is not just an administrative role. Successful incumbents have been able to lead the research sector, in part because of their experience as researchers and their long-term understanding of the system. The ARC is the institution best placed to provide disinterested, sector-wide leadership. This is an important and nationally beneficial element of the position.

The ARC has recently announced the appointment of a new Chief Research Officer (CRO) whose role is to report direct to the CEO and advise on research matters at the highest level. This role is in part seen as “reaffirm[ing] the ARC’s commitment to strengthening the Council’s engagement with researchers and universities.”<sup>6</sup> It is our view that this should be one of the primary roles of the CEO, not grounds for creating a new role.

**The other issue of major concern for us, with material impact on the quality of advice within the ARC is the diminution of Executive Director (ED) roles.** In recent years these roles have been diminished in public service level, in scope for outreach, and in contribution to policy and leadership. As a result, the ARC has had difficulty recruiting and therefore long vacancies especially in Social and Behavioural Economics (SBE) (vacated in February 2020) and Humanities and Creative Arts (HCA) (vacated in mid 2021). We have made representations to the ARC’s CEO and successive Ministers on this issue. In the past these roles have had a vital sector engagement function and appointees need to be strong communicators and research leaders. We’re appreciative that new ED appointments have now been announced and that both are senior research professors (noting that the HCA role needs to be re-advertised because that person has since been appointed to the newly created CRO role).

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<sup>4</sup> Cf. composition and function of NHMRC’s Council <https://www.nhmrc.gov.au/about-us/leadership-and-governance/council>

<sup>5</sup> Available at

[https://www.aph.gov.au/Parliamentary\\_Business/Committees/Senate/Education\\_and\\_Employment/ARCBill/Submissions](https://www.aph.gov.au/Parliamentary_Business/Committees/Senate/Education_and_Employment/ARCBill/Submissions)

<sup>6</sup> See announcement: <https://www.arc.gov.au/news-publications/media/media-releases/new-chief-research-officer-further-build-research-excellence>

## Academic expertise and peer review

**Q3. 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?**

**The Act should consolidate the general principle of and primary importance of peer review, and the role of the College of Experts.**

A stronger ARC, better governed and headed by a research leader with deep sector experience, should be a world leading agency when it comes to its grants and assessment processes, able to lead and innovate on what constitutes excellence.

The governing Board and the committees it appoints should have the primary responsibility for policies and procedures for recruitment of expertise, grant guidelines and implementing review systems.

Peer review is the foundation of the ARC's grant processes and research assessment exercises, but it is also important to acknowledge that the proliferation of programs, the volume of applications and timing of ERA and EI has put pressure on peer review, and stretched resources beyond capacity. **Process improvements are urgently required to improve workloads for peer assessors and panels.**

## Grant approval

**Q4. 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.**

**Yes.**

This year we joined forces with Australia's Learned Academies in a Joint Statement to urge bipartisan **commitment to a research system that is consistent with world's best practice, where expertise in both conducting research, and evaluating which research to support is essential.** This "provides confidence to the community that pays for it, the politicians who prioritise it, and the researchers who conduct it, that the outcomes of our research support a culturally rich, economically prosperous and secure Australia".<sup>7</sup>

Under the ARC Act, the Minister for Education is responsible for funding and approving research proposals. Our submission to the Senate Inquiry in February 2022 raised concerns about the ways in which the Minister can use their power to reject proposals recommended for funding by the ARC, which have otherwise met lengthy and strenuous tests of excellence, national benefit, and value for money.<sup>8</sup> The system currently has no

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<sup>7</sup> Joint Statement from the Learned Academies <https://humanities.org.au/news/joint-statement-from-the-learned-academies-regarding-arc-funding-veto/>

<sup>8</sup> [https://humanities.org.au/wp-content/uploads/2022/02/220225-AAH-ARC-Bill-Independence\\_final.pdf](https://humanities.org.au/wp-content/uploads/2022/02/220225-AAH-ARC-Bill-Independence_final.pdf)

checks and balances to ensure that the veto power cannot be used arbitrarily on personal preference or political grounds.

While there may be circumstances where the Minister needs the power to not approve a recommended grant (e.g. classified national security issues), these should be exceptional, with a legislative requirement for the Minister to provide detailed reasons to Parliament within a prompt, specified timeframe. A new governing Board for the ARC should also be charged with ensuring the integrity of the research assessment system is maintained and provide reassurance to the Minister on that front.

We support the collective position from the university sector (developed at a plenary meeting of Universities Australia) on this matter during the Senate Inquiry:

Universities Australia recommends the Senate **supports amending the *Australian Research Council Act 2001* to remove Ministerial decision-making on individual research applications.**

Universities Australia recommends that, if the Senate decides that Ministerial decision-making on individual research applications should continue, then a predictable, transparent and informed process be in place for those decisions.<sup>9</sup>

We also support the submission made by QUT at the time that **parliamentary oversight remains an important principle** and could be assured through a range of different means, including:

- make it difficult for ARC advice to be overturned by Minister without giving reasons and impossible to do without being accountable to Parliament. Parliament must have explicit oversight of the exercise of Ministerial discretion, tabling decisions (within 15 sitting days), including details of the Minister's reasons and the process by which the Minister arrived at their decision and the criteria used to override ARC criteria.
- The "ARC Act must be amended to align more closely with the NHMRC Act to provide the reasons for any Ministerial direction under section 33(1)."<sup>10</sup>

The **major funding agencies of research systems in the US, UK and Canada uphold basic principles of independence and integrity, are seen as strong advocates of basic and applied research, and consult widely on research priorities.** There are also usually legislative safeguards, which hold to a standard of integrity for the assessment of research, such as the UK's Haldane Principle:

- researchers are best placed to determine detailed priorities;
- the government's role is to set the over-arching strategy; and

<sup>9</sup> See <https://www.universitiesaustralia.edu.au/wp-content/uploads/2022/02/220225-FINAL-UA-Submission-ARC-inquiry.pdf>

<sup>10</sup> QUT's submission available at

[https://www.aph.gov.au/Parliamentary\\_Business/Committees/Senate/Education\\_and\\_Employment/ARCBill/Submissions](https://www.aph.gov.au/Parliamentary_Business/Committees/Senate/Education_and_Employment/ARCBill/Submissions)



- the research councils are guardians of the independence of science.

The Group of Eight and others have called for the adoption of the Haldane Principle “to ensure the allocation of public funding for individual research proposals are best taken following evaluation by an independent council of experts and not directly by a Government Department or Minister.”<sup>11</sup> We **endorse this as a general principle, whether it is Haldane or something Australia develops independently.**

## National Interest Test

### Q5. PLEASE PROVIDE SUGGESTIONS ON HOW THE ARC, RESEARCHERS AND UNIVERSITIES CAN BETTER PRESERVE AND STRENGTHEN THE SOCIAL LICENCE FOR PUBLIC FUNDING OF RESEARCH?

**Our preference is for seeing this as a public accountability and transparency issue and not social licence** – which is imported from the corporate sector, and runs the risk of being revoked by a Minister.

We are supportive of making research as accessible as possible to a wide range of audiences. This is the most effective accountability and transparency measure.

The NIT has been a damaging, costly and confusing accountability measure.

The concept of the national interest is inherently political, it is what elections are fought over. So, the introduction of the national interest as part of the assessment process politicises it. This is at odds with the rigour afforded to the other key parts of the process.

There are other ways of capturing information about the national interest in research, with panels doing it as part of their assessment. Recent changes to the NIT whereby DVCRs now sign off and the College of Experts has carriage of assessment goes some way towards addressing our concerns. The College is best placed to evaluate whether applications provide research value for money, rather than it being the additional administrative burden that it became for the ARC and universities.

While these changes are welcome, they are not yet tested across ARC programs (we believe only piloted in the new Industry Fellowships assessment) and nor has the ARC Review’s deliberative/consultative process run its course.<sup>12</sup>

We are also concerned that there has been a **lack of a clear, transparent process for updating Australia’s research priorities, and we welcome recent moves by the Government to do so.** Our strong preference is that the government take a holistic, whole-of-sector approach to identifying key national priorities for *research* – and not only science and manufacturing – that harnesses all the strengths of our research

<sup>11</sup> See <https://go8.edu.au/go8-submission-to-the-senate-education-and-employment-legislation-committee-review-of-the-australian-research-council-amendment-ensuring-research-independence-bill-2018>.

<sup>12</sup> See recent announcement: <https://www.arc.gov.au/news-publications/media/media-releases/simple-national-interest-test-nit-statement-will-help-researchers>



community across the disciplines to address the grand challenges that Australia faces over the next decade. There is an opportunity in this process for the Government to highlight the importance of genuinely multidisciplinary research for addressing key areas of priority.

**The Academy supports the development of inclusive and forward-looking national research priorities that are in the long-term national interest.** We agree that the nation's research effort should support work in areas prioritised for social, environmental or economic development. **While short to medium term priorities should set the agenda for strategic programs, this must be balanced by resourcing for longer-term fundamental research.** Proposals to allocate high fixed proportions of program expenditure against specific sets of priorities (such as the Manufacturing Priorities) are likely to have unintended consequences, which may prejudice the capacity of the ARC to meet overall public policy objectives. It is crucial that the breadth of the research sector be actively involved in the process used to determine what these priorities should be.

## Administrative burden

### Q6. WHAT ELEMENTS OF ARC PROCESSES OR PRACTICES CREATE ADMINISTRATIVE BURDENS AND/OR DUPLICATION OF EFFORT FOR RESEARCHERS, RESEARCH OFFICES AND RESEARCH PARTNERS?

The **time-commitment burdens on researchers and administrators in assembling a competitive grant application are high**: researchers in our disciplines see them as having grown steadily in recent years. This does help to assure the ARC of the quality of funded research. However, it absorbs a large quantity of time that could otherwise be spent doing research. In a system that funds fewer than one in five applications, this is a considerable inefficiency. **We need greater innovation and agility on the part of the ARC to refine and revise its existing programs, as well as respond to sector concerns.** For example, moving to a two-stage application process with an initial less burdensome qualifying stage should be considered, at least for some schemes. New Zealand's Marsden Fund grant scheme and Sweden's Riksbankens Jubileumsfond for the Advancement of the Humanities and Social Sciences provide models worth considering.<sup>13</sup> There are also many opportunities for streamlining applications.

Another example is around collaboration. **Collaboration Agreements and multi-institutional agreements** are required for ARC funding between partners, increasingly with multiple partners. However, agreements must be approved by the ARC before they

<sup>13</sup> Marsden Fund (New Zealand), administered by the Royal Society <https://www.royalsociety.org.nz/what-we-do/funds-and-opportunities/marsden/>; Riksbankens Jubileumsfond (Sweden): <https://www.rj.se/en/about-rj2/>. In past submissions we have also pointed to the targeted and strategic support for humanities collaboration with industry (broadly defined) in the UK, see in particular our submission to the Review of Australia's Cultural and Creative Industries and Institutions, [https://www.humanities.org.au/wp-content/uploads/2020/11/201928-AAH-Policy-Creative-Cultural-Industries\\_final.pdf](https://www.humanities.org.au/wp-content/uploads/2020/11/201928-AAH-Policy-Creative-Cultural-Industries_final.pdf). The AHRC's Towards a National Collection program is a recent standout, see <https://www.ukri.org/what-we-offer/browse-our-areas-of-investment-and-support/towards-a-national-collection-opening-uk-heritage-to-the-world/>

can be considered by partners. This **can cause extensive delays** both with the ARC's resourcing to review these in a timely manner, and if partners require revisions which require return to the ARC. If we want a system to encourage collaboration and academic-industry research, we need to address these requirements and how they are resourced.

## Process improvements

### Q7. WHAT IMPROVEMENTS COULD BE MADE:

- **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?**
- **TO THE ARC ACT TO GIVE EFFECT TO THESE PROCESS IMPROVEMENTS, OR DO YOU SUGGEST OTHER MEANS?**

The ARC Act could require the ARC to **publish a rolling grants calendar every 6 months for the following 12 months** and to stick to it in terms of application deadlines and announcement dates. That would allow the research community to plan effectively and for administering organisations to deploy resources efficiently.

**The one-size-fits-all model for grant programs, operating with a single set of rules across all academic disciplines, does not work well.** The ARC should introduce a discipline-specific (or cluster specific) scheme that retains rigorous assessment processes but has higher success rates and lower funding limits. Here, an example worth considering is the Insight Program administered by Canada's Social Sciences and Humanities Research Council. This program is divided into Stream A and Stream B for low- and high-cost research projects in social sciences and humanities (both of which are inexpensive relative to the cost of STEM projects). The lower and upper thresholds for Stream A projects are \$7,000 and \$100,000. Stream B funding ranges from \$100,001–400,000 and the duration of the funding for both streams is two to five years. Both streams are subject to the same assessment process, but the success rate for projects in Stream A is higher.<sup>14</sup>

The differences between 'high cost' and 'lower cost' research are not necessarily mapped onto differences between SHAPE and STEM disciplines. In the humanities, for example, a discipline like archaeology will have equipment, fieldwork, and laboratory expenses akin to many of the sciences. Increasingly, media studies, economics and many of the social sciences have fieldwork and infrastructure costs, related to greater use of experimental methods and computational approaches. Supporting multidisciplinary research between STEM and SHAPE fields often involves a combination of different approaches and thus different kinds of funding requirements.

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<sup>14</sup> See [https://www.sshrc-crsh.gc.ca/funding-financement/programs-programmes/insight\\_grants-subsventions\\_savoir-eng.aspx](https://www.sshrc-crsh.gc.ca/funding-financement/programs-programmes/insight_grants-subsventions_savoir-eng.aspx)

The ARC needs new funding processes that reflect a bigger vision of excellence in SHAPE research. In the SHAPE fields, we have seen the dominance of project-based funding (typically three-year, individual projects) rather than program funding (longer-term, collaborative funding aimed at building critical mass). **One of the missing pieces of the puzzle is funding within the Discovery program that is explicitly geared towards building collaborative research programs** (including with international partners) that might lead to future Centres of Excellence, or other at scale research initiatives. Once more, a one-size-fit all approach is preventing more innovative and flexible funding opportunities, including those that help build research capability across disciplines, as opposed to incentivising over-concentration in a narrow range of fields (perceived to be the most likely to be funded).

There are improvements to make to application and assessment processes at various points in the process, including at the university level.

For universities, the **incentives are heavily geared to the generation of research income and therefore effectively work to multiply the number of grant applications**. This has several knock-on effects: success rates have declined significantly as a result; and at the individual researcher level, there is undue pressure to submit applications annually.

The Academy is aware that many institutions factor the number of grant applications submitted (and success rates) into performance reviews and metrics. Grant applications processes at the university level can therefore focus on the quantity of applications rather than on developing excellence. The Academy believes there is capacity for universities to take on greater quality control.

## ERA and EI

### Q7. WITH RESPECT TO ERA AND EI:

- 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?
- 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?
- SHOULD THE ARC ACT BE AMENDED TO REFERENCE A RESEARCH QUALITY, ENGAGEMENT AND IMPACT ASSESSMENT FUNCTION, HOWEVER CONDUCTED? IF SO, SHOULD THAT REFERENCE INCLUDE THE FUNCTION OF DEVELOPING NEW METHODS IN RESEARCH ASSESSMENT AND KEEPING UP WITH BEST PRACTICE AND GLOBAL INSIGHTS?

**We believe some form of national research assessment is still of value, but the current ERA process is no longer fit for purpose** and far too burdensome for universities to undertake. **We believe a major overhaul of the existing ERA and E&I processes is required**, including trials of data-driven and more centrally harvested approaches, as

well as engagement with the SHAPE sector on new approaches to peer-review disciplines. On this point, we suggest specific attention to a more systematic study of which metrics might be useful in the humanities, and for what purposes (e.g. Google Scholar, which picks up books). This could then be used in concert with peer review.

We are aware the ARC's working group has been considering how best to streamline and revamp the ERA review and has recently submitted its advice to the Minister.<sup>15</sup> **We strongly encourage this review to ensure the different review processes are integrated and aligned on the question of the future of the ERA.** At the very least, the ARC should be explicitly referenced as providing expert advice, support and best practice in relation to research assessment for any future ERA and EI processes.

Concerns we have with ERA in its current form and possible areas for redress are as follows:

- The scale of the exercise is simply too big to be manageable now. It would be better if there was a review of how the ERA might proceed in the future via a sample of outputs from each organisational unit – not the disciplines.
- The shortage of qualified peer reviewers severely compromises the process. The design now seems unrealistic; we just don't have the capacity to do the amount of peer review being required. Rather than reduce the imperative for peer review, we should reduce the scale of the exercise.
- Selecting items in peer review disciplines as the UK's REF does would help in that the quantum of assessment could be more manageable. There may need to be some modelling done on that, especially with fields of research like History and Education where outputs returned are authored by staff who come from far beyond a departmental structure. It would also need to be somewhat cross-sectional of all relevant staff.
- A dashboard/template approach that the ARC provides could work to streamline and capture the essentials, once they're agreed to. This would take some development, testing, and socialising.

As for the 'data-driven' approach – we are not supportive of a reliance on the major journal rankings and citation ranking systems that currently operate in the university sector and in particular Scopus/Scimago, and Clarivate Analytics/Web of Science. While these systems are well accepted and accurate in regard to many citation-heavy disciplines that publish in journals captured by these providers, they are, as is well recognised, poor in relation to the humanities and arts and areas of the sciences.

**We are supportive of a 'data informed' approach**, in recognition of the diversity in publishing now and the more complex environment. Any future research assessment will

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<sup>15</sup> <https://www.arc.gov.au/news-publications/media/network-messages/era-transition-new-working-group-advice>

need to build towards the metrics needed – given bibliometrics are of limited utility, and institutional repositories and data infrastructure are not currently set up to collect diversity of output.

## Evaluation capacity

### Q8. WITH RESPECT TO THE ARC'S CAPABILITY TO EVALUATE RESEARCH EXCELLENCE AND IMPACT:

- 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?
- 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?
- WOULD A DATA-DRIVEN METHODOLOGY ASSIST IN FULFILLING THIS PURPOSE?

Our response here follows on from Q8.

**The ARC's evaluation capability may be able to be deployed to other areas, but its first priority should be to train that expertise on the research sector.**

The ARC collects and generates unique data and this could be used to inform targeted and strategic approaches to research development.

**We think there is merit, in place of ERA, of a 'State of the Research Sector' approach.** As a retrospective assessment the ERA is not necessarily a good indicator of strengths at the time of assessment or of future performance. The ARC could continue to collect data annually and get better at sharing that data with the sector, and on a five-yearly schedule produce a 'State of the Research Sector' report which would provide evidence of value to the Minister and the sector – for workforce development, capability assessment, and strategic planning. A thorough report would include indicators on gender equity, workforce diversity, and research environments.

## Other comments

### Q10. 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?

We wish to raise five further issues for consideration:

1. **Take a system-wide approach.** The ARC cannot be viewed in isolation, it needs to be understood in the wider context of Australia's higher education and R&D system. We welcome the Panel's advice that the outcomes of this review will 'connect' with the other reviews currently underway: including the Universities Accords process, and the

review of the National Science and Research priorities. We look forward to further advice and consultation on how that will happen.

2. **Address the decade long decline in real ARC funding.** The ARC is the only major Government funder of non-health and medical discovery research in Australia.
3. **Encroach of applied and commercial research funding.** The balance between Discovery and Linkage programs has shifted significantly. We are concerned that this drift has compromised support for fundamental research, and as argued above, we believe there should be a specific mandate for ensuring at least 50 per cent of all ARC funding should be dedicated to basic research and the Discovery programs. The focus on commercialisation is important, but it should not come at the expense of core ARC funding, and nor should any potential increase in ARC funding be limited to supporting applied research and the commercialisation of research.

Also, even within the Linkage programs, there has been a narrowing of focus to all but exclude SHAPE fields. For example, SHAPE fields have effectively been written out of Industrial Transformation Research Hubs and Industrial Transformation Training Centres. The ITRP has a remit to engage “Australia’s best researchers in issues facing the new industrial economies and training the future workforce”. The research training component is literally in the business of building future workforces. To date the scheme has aligned to the former Government’s Industry Growth Centres, which is too narrow a focus. Linkage programs should be explicitly mandated to remain open to SHAPE fields. Otherwise, Australia’s research sector risks underperforming in areas of real significance for Australia, including:

- creative and cultural industries – already fast-growing areas of the economy that could be supercharged by innovative research
- Australia’s Asia knowledge capability
- the subjective and social aspects of adopting new technologies such as AI – SHAPE disciplines extend opportunities and minimise harms.

4. **Provide for flexibility in grant programs:**
  - a. In renovating a ‘one size fits all’ grants funding programs, we suggest a more graduated program of funding starting at lower levels for disciplines where the same amount of funding goes further.
  - b. Reconsider the balance between projects and fellowship funding. There is evidence that the fellowship programs need to be revisited – DECRA’s, Future Fellowships and Laureates.
  - c. One of the areas of most need is funding for collaborative research in the Discovery program that sit between fellowships and Centres of Excellence, a program akin, for example, to former network funding but reimagined and as

a way of facilitating multidisciplinary research in Australia some of which may scale up to CoEs.

5. **Support ECRs:**

- a. DECRAAs are no longer any kind of postdoctoral scheme, they are being awarded to Senior Lecturers and Associate Professors. The scheme needs to be revamped and turned into a genuine postdoc scheme for those fresh out of PhDs. One way forward it is to make it a pure fellowship scheme with limited project funds and/or ask universities to co-invest.
- b. Currently, **there are unclear career pathways at the end of these fellowships.** Fellowships programs need to be re-thought to be better matched for the workforce we have now. The current system is built around a 'feast' or 'famine' model. ECR talent is being lost to the system. Consideration should be given to spreading these resources over a larger number of smaller fellowships.



## APPENDIX A

Australian Academy of the Humanities previous submissions related to the Australian Research Council:

1. Response to the Australian Research Council's 2023 Excellence in Research for Australia (ERA) Benchmarking and Rating Consultation Paper
2. Australian Research Council Amendment (Ensuring Research Independence) Bill 2018
3. Australian Research Council ERA EI Review Consultation Paper
4. Australian Research Council implementation of the National Science and Research Priorities
5. Increasing the Diversity of Australia's Research Workforce: A Pathway to Gender Equality in ARC Grant Funding Processes
6. Australian and New Zealand Standard Research Classification Review
7. House of Representatives Standing Committee on Education, Employment and Training's Inquiry into Australia's Research Funding
8. Australian Research Council's Engagement and Impact 2018 Consultation
9. Australian Research Council's Research Opportunity and Performance Evidence (ROPE) Consultation
10. Australian Code for the Responsible Conduct of Research
11. Engagement and Impact Assessment Consultation Paper
12. Review of Research Policy and Funding Arrangements for Higher Education
13. ARC Centres of Excellence Scheme for Funding Commencing in 2017
14. ARC Funding Rules for Discovery Program schemes and the Future Fellowships scheme
15. Draft Excellence in Research for Australia (ERA) 2015 Submission Guidelines
16. Assessing the Wider Benefits of University-Based Research Discussion Paper
17. Australian Research Council, Excellence in Research for Australia 2012 Review

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