

# Australasian Council of Deans of Arts, Social Sciences and Humanities

## Australian Research Council review submission

Wednesday December 14, 2022

### Q1. 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.*

DASSH proposes the Act be recrafted to provide the ARC with the scope to determine the nature of the programs it funds with a particular focus on establishing a wider range of grant programs. All funding categories are currently named in the legislation however removing this from the Act and charging the Council with responsibility to provide a wide array of programs to support pure, applied, and collaborative in both large and small scale would significantly improve the research landscape.

Many arts, social sciences and humanities projects do not require large funding components and thus are excluded from ARC program or are forced to artificially 'scale up' projects to meet the requirements of the narrow range of programs. The cost burden of many arts, social sciences and humanities research projects is lower than that of other disciplines but they have significant impact making them extremely good value for money and yet the ARC is unable to support these works.

Reconstituting the legislation to provide the Council with the ability to determine its programs will also allow it the flexibility to adapt to a rapidly changing environment.

## **Q2. 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.*

DASSH is in favour of a reinstatement of the ARC Board. Our members believe decisions relating to research funding should sit with a diverse group of people drawn from the research sector in Australia and reflect our global standing as a nation of world leading researchers. While Ministerial discretion exists, decisions about how our research dollars are spent should be made based on the recommendations of a Board, not the CEO.

DASSH proposes the Board include an Indigenous scholar, the Chief Scientist, at least one Deputy Vice Chancellor of Research and at least one active researcher who has held an ARC grant in the last five years. The Board will be drawn from and need to reflect the whole of the Australian research sector. It is imperative that the Board includes First Nations representation as well as equitable opportunities for men, women and people from gender diverse backgrounds.

## **Q4. 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.*

DASSH made a submission to the Senate Education and Employment Legislation Committee in 2022 and later addressed the committee to argue for the removal of Ministerial intervention in grant funding decisions.

DASSH maintains its position that the politically expedient practice upheld by some governments of vetoing some projects (that were almost exclusively in the arts, social

science and humanities) is not only bad for the Australian research community, and Australian society, but Australia's standing internationally.

Given legislation allows for this practice, and that it has been used for political purposes, we believe there is a strong argument for legislative reform. DASSH strongly argues that the Act should be amended to consolidate the pre-eminence of academic judgement in the allocation of funding. This should centre around a process of peer-review and through oversight of the ARC board.

The discussion paper notes: *"The panel is seeking recommendations that may give confidence to the academic community such that when a Minister intervenes in genuine and extraordinary circumstances, they would be obliged to notify that intervention and give reasons in detail to the Parliament, in addition to their obligations under guidelines, senate orders and the provisions of any other legislation."*

DASSH acknowledges that the recommendation of the Committee was to retain Ministerial vetoes, and as such the proposal that the Minister would be obliged to notify Parliament of any intervention and give reasons would be welcome.

Peer review remains the gold standard of academic assessment, however, the system used by the ARC has perverse incentives as well as allowing reviewers a degree of anonymity from those they are assessing. The ARC should revise its peer review system to reflect the latest research into the most effective and equitable forms of peer review.

#### **Q5. National Interest Test**

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

The revisions to the NIT that were recently introduced mark an improvement in the way it is applied but it remains highly subjective and open the shortcomings of the current peer-review process of skewed incentives.

The research community must constantly explain the benefits of public funding of research but should do so not through small-bore 'tests of benefit' but through regularly and systematic demonstrations of impact, utility and social contribution.

#### **Q6. 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 discussion paper outlines many administrative issues academics face when engaging with the ARC. Our members specifically note the following areas of concern:

Academics in Australia depend on top tier funding to commence and progress major projects. Work plans and livelihoods depend on funding announcements— particularly Discovery Grants. It was during the week leading up to Christmas in 2021 that the Federal Government announced its intention to veto several approved projects leaving applicants in a precarious position with only weeks until the funding was supposed to commence. This instability is damaging not only to those involved directly but also to the perception of the program in Australia and internationally. DASSH welcomes the Minister’s commitment to the delivery of programs on time and to a predetermined time frame.

DASSH members are also calling for a streamlined application process. Applicants spend many weeks and months writing applications every year with the majority being unsuccessful. This amounts to thousands of hours that could be better spent on other work if the process were streamlined.

We are advocating for the introduction of a two-step process, particularly for the large programs. DASSH proposes there be a short expression of interest stage initially and only once an application clears that hurdle is a full application developed. Timeframes for assessment would need to be considered if this avenue were pursued as wait times on decision making are already an issue for many applicants.

There is also potential for the development of smaller grant programs with significantly truncated application processes – for example a ‘Fast Fifty’ – a five-page application for \$50,000.

#### **Q7. 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 rigor, 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.*

Interdisciplinary collaborations in the research setting are becoming more and more commonplace and play a vital role. The ARC must become better equipped to assess multidisciplinary, interdisciplinary and transdisciplinary work. The peer review process and the metrics used to report on funding allocation are very discipline specific. DASSH would welcome the introduction of constructive guidelines on how to better assess and incentivise this diverse and important collaborative work. Additionally, DASSH members encourage the Panel to consider the implementation of a process whereby applicants self-identify as belonging to either a specific discipline or as being interdisciplinary.

#### **Q8. 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?

DASSH believes the ERA process has shown conclusively that research in Australia is of an extremely high standard. However, ERA is extremely costly to run and its larger purpose remains unclear as it does not have any direct correlation to funding.

DASSH recognizes the ongoing need to assess the quality of research being undertaken in Australia and its impact. However, the process for doing so needs to be cost-effective and linked to a clear sense of the ends to which the assessment of research quality is being put. The assessment should also put a strong emphasis on social impact of scholarship broadly understood and not focus only on narrow issues such as patents or funding that a project or area has been able to attract from the private sector.

#### **Q10. Other comments**

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Collaborative  
Influential  
Connected  
Knowledgeable

*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?*

DASSH members believe the ARC should be not only about cutting edge, world leading knowledge, but also about developing the next generation of scholars. We would like to see dedicated resources made available for early and mid-career researchers in a bid to cultivate the emerging talents of younger generations.

Inflation caused by the current labor market is also an issue that needs to be addressed. ECR and MCR schemes are not fit for purpose. The fellowship schemes should be reconfigured to reflect the reality of the academic labour market. Post-doctoral fellowships for humanities, arts and social sciences are desperately needed as the gap between finishing the PhD and what it takes to be competitive for a Lev B position has blown out dramatically. A possible solution to this problem could be to impose a condition of the award whereby limits are set – for example one to two Level Es who must include same number of Ds, Cs, Bs in the application as CIs.

The strength and resilience of Australian research is intimately connected to the ARC, which has not been politicised or as desperately defunded as the comparable US funding agencies have. It has not had to navigate Brexit, as the UK/European funding agencies have. It needs changes as outlined above, and it deserves extra funding because across our disciplines – particularly when we work in cross-disciplinary ways – Australia performs very highly in a global context. This is a pivotal moment in which Australia can boost itself above the UK and the US.