



Australasian Research Management Society

"ENABLING GLOBAL RESEARCH EXCELLENCE"

## Response by the Australasian Research Management Society Inc to the Review of the Australian Research Council Act 2001

### Consultation Paper - 14 December 2022

The Australasian Research Management Society (ARMS) welcomes the opportunity to make a submission on the Review of the Australian Research Council Act 2001.

#### PREAMBLE:

The [Australasian Research Management Society](#) (ARMS) Inc is an internationally connected community of research management professionals<sup>1</sup> operating at the highest standards to influence, support and enhance the global delivery of research and innovation excellence and impact. The Society seeks to develop and promote international best practice in research management, enhance the connections between researchers and research management professionals and support and enable the profession of research management.

With almost 70% of ARMS' corporate members representing the higher education community in Australia, ARMS maintains an abiding interest in the efficiency, transparency, effectiveness, and coherency of the Australian research ecosystem for funding all forms of research for societal benefit.

#### RECOMMENDATION:

ARMS supports amendments to the ARC Act that will empower the ARC to operate transparently and effectively and reduce the administrative burden on the ARC, university researchers and university research management. Examples include the ability of the ARC to make funding decisions and manage funding without seeking approval by the Minister.

#### RESPONSE TO THE CONSULTATION:

Our response to the consultation is via the lens of Research Management as follows:

As an advocate for the profession of research management, ARMS welcomes post-review engagement with the ARC to support efficient administration in line with the new ARC Strategy, rather than the review of the Act.

#### *Scope and Purpose of the ARC*

Under the Act, the Minister formally approves the funding rules, the allocation of funding across programs, the proposals for funding and variations to funded projects. We query the necessity for this which creates an additional procedural level for the ARC. Conversely, under the NHMRC Act, funding decisions are made by the NHMRC and not the Minister.

ARMS **RECOMMENDS** that the Act be largely focused on empowering decision making by the ARC under broad direction of the Government via the Minister. The Act should be less prescriptive with public transparency achieved through the already well-established ARC communication channels, annual reporting and via oversight by the ARC Board.

The Minister and Government would be able to provide broad direction through the consultation, identification and establishment of national research priorities and other policy directions which would be

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<sup>1</sup> Research Management Professionals are defined as individuals who provide specific management, technical, administrative, or other assistance to support the research and innovation endeavour.

reflected in the ARC's Strategic Plan.

Where the Australian university research sector can contribute to new Government priorities, as may arise from time to time, Government can provide new research funding appropriations to the ARC which can be implemented through Special Research Initiatives.

We also consider that the ARC should have the explicit ability to form international partnerships and to provide joint funding schemes with other like funding agencies internationally. To the extent that the Act impedes such activities, it should be amended to enable the ARC to achieve these objectives.

ARMS **RECOMMENDS** that the ARC follows the lead of the NHMRC in addressing gender equity of research funding and other forms of diversity including for indigenous research and indigenous researchers. To the extent that the Act constrains the ARC in effectively achieving such objectives, it should be amended.

It is important that the ARC continues to support research funding across all non-health/medical disciplines and all research career stages.

We also consider that the ARC can play a much broader role in sharing its significant skills, funding management expertise and research funding platform (ARC RMS) to provide support for funding programs as a delivery partner for other government agencies. This could provide an opportunity for the Government to streamline its grant management systems for the benefit of all end users. The Act should enable both Government and the ARC to do this if this is perceived as a barrier. Thereafter, it would be a choice by Government as to whether it wishes to utilise the ARC for this purpose.

Based on our extensive experience, ARMS strongly supports the role and purpose of the ARC in fostering the national research and innovation system including collaboration with industry. However, ARMS **RECOMMENDS** better clarity around the definition of Defined Purpose. The ARC supports pure basic, strategic basic and applied research, but not experimental development, as defined by the ABS. It would be helpful to more clearly articulate the difference between applied research and experimental development. The latter is currently outside of the ARC's scope, and it is appropriate for this to remain as such. Nevertheless, experimental development and subsequent translation are natural extensions of applied research and greater clarity on funding pathways for experimental development would be of value.

Our members support any amendments to the Act which consolidate the pre-eminence and importance of peer review as a core principle of grant application assessment.

Finally, ARMS **RECOMMENDS** amendments to the Act which enable the provision for the CEO to act independently without approval from the Minister; and that the roles and procedures for appointing the ARC Executive Directors and College of Expert Members are clearly defined.

#### *Grant Approval*

We note that the NHMRC Act and the UK's Higher Education Research Act 2017 provide comprehensive examples of alternative grant approval processes which the ARC should consider. ARMS **RECOMMENDS** that a closer review of these two systems be used to better inform a revised grant approval process that enables and empowers the ARC to make funding decisions without Ministerial approval.

#### *Administrative Burden*

ARMS **COMMENDS** the ARC for its ongoing and constructive collaborative engagement with our members to refine pre- and post-award practices with an end goal of reducing the administrative burden for all parties.

While this has resulted in a number of key refinements to existing pre-award and post-award processes, ARMS also **RECOMMENDS** a number of key changes to help further reduce the administrative burden as follows:

- Greater support by the ARC in agreement negotiations with non-university partners. It would be highly beneficial if the ARC could provide a stronger voice around the expectations relating to IP ownership, for example particularly with regard to Linkage Projects. Additionally, some terms originating from the Funding Agreement which universities need to pass down to partners are particularly problematic and result in significant time and effort outlay. We are able to provide further information in discussion with the ARMS Contract Working Group.
- There remains significant opportunity to improve post-award management of projects, especially in relation to project variations.
- Changes to the Act to enable the ARC to make changes to the funding rules and funding agreements such that universities and ARMS are able to review and provide feedback on draft versions of guidelines and agreements are recommended. Currently, the ARC seeks feedback from the sector but is unable to provide the actual drafting for review as final approval is made by the Minister. The 2021 pre-print matter could have been avoided if the sector had been consulted about the proposed drafting to provide feedback.

ARMS **RECOMMENDS** that the Act should be amended to empower the ARC to act more proactively and responsively to improve the support for non-university partner relations and the management of funding.

#### *Process Improvement*

Please also refer to ARMS' response under Administrative Burden.

ARMS **RECOMMENDS** that an expression of interest (EOI) will have limited benefit and may not reduce workload in the long term. Instead, it might be more beneficial for the ARC to consider the NHMRC's Minimum Data Type approach as an alternative. Any introduction of an EOI process needs to be undertaken in a manner that enables equal opportunity for all researchers and reduces the burden placed on the College of Experts and university administration.

Any process improvements that help to reduce the number of poor-quality grant applications is supported by our members. Furthermore, ARMS members value the importance of having clear and transparent application assessment processes as being synonymous to good governance and constructive feedback mechanisms. Any legislative or non-legislative changes that enable this are supported.

#### **CONCLUSION:**

The recommendations made by ARMS reflect the experiences of Research Management Professionals, who operationalise the research funding system on a daily basis. Our members are employed across the diverse research and innovation enterprise and yet share a common concern to facilitate Australia's research community to undertake discovery and invention for public benefit. To this end, ARMS remains an active and willing partner to enable constructive solutions arising from this review. ARMS and our members look forward to continuing engagement with the ARC to improve the management of research funding for the benefit of Australia.

**CONTACT:** To discuss further, please contact ARMS President, Dr Tania Bezzobs,

[ARMSPresident@researchmanagement.org.au](mailto:ARMSPresident@researchmanagement.org.au)