

14 December 2022

By online form

## **ABDC submission to the Review of the Australian Research Council Act 2001**

**Q1. 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**

The legislation should stress the ARC's role as the most important funding body in Australia for independent research.

**b. the balance of Discovery and Linkage research programs**

The Discovery Program (DP) enables fundamental research. It is important to maintain reasonable levels of DP funding that are proportionate to funding streams for fundamental research in other leading research nations.

Not all research is, can, or should be applied or have a goal of commercialisation. Therefore, there need to be protections legislated to ensure a reasonable distribution of Discovery funding to future-proof blue sky research in the HASS disciplines.

**c. the role of the ARC in actively shaping the research landscape in Australia**

*Neglect of business school research*

Business school disciplines cut across every part of the economy and are critical to our nation's future. These include running small businesses that make up the bulk of employers; creating new innovative enterprises; skilling up and inspiring strong, transformational leaders; and commercialising major STEM discoveries — to name only a few.

The ABDC is increasingly concerned that the level of funding for FoRs 14 and 15 appears to be declining. This does not reflect the importance of business disciplines in the research landscape. Further, the national interest areas are very much focussed on STEM which understates the importance of business disciplines.

*National Interest Test*

The ABDC welcomes the recent simplification of the National Interest Test by removing a layer of ARC review. The ABDC also applauds the emphasis on plain English and the translation of research for wider audiences. (See our more detailed feedback on translation in our response to question five.)

The ABDC understands the importance of the Minister being the final decision-maker. However, to avoid any real or perceived political bias, any ministerial decisions to override the peer-reviewed grant approvals should be transparent and involve the public release of the well-considered reasons for ministerial intervention when a grant is rejected. Consideration should also be given to a swift independent process of appeal against ministerial rejections to avoid the issue being played out in the media.

The ABDC appreciates the importance of predicting and evaluating the impact of research but suggests that more detailed guidance of what constitutes impact would reduce the number of statements being returned and the impost that puts on the organisations applying for funding.

The ABDC also contends that ensuring Australia's place as a global leader in a research discipline should satisfy the definition of the National Interest Test.

**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?**

Some ABDC members expressed the view that the ARC's current governance model provides inadequate independent oversight and the potential for a lack of transparency in ministerial interventions into peer-assessed funding decisions.

For effective governance, there must be an agile and responsive independent board comprising members with a carefully considered mix of appropriate skills. To avoid actual or perceived political bias, board nominations must not depend solely on ministerial appointment.

From the viewpoint of independence in appearance some members questioned whether College of Expert members should be precluded from seeking funding while they are College members.

Continuous disclosure duties under the *ARC Conflict of Interest and Confidentiality Policy* could be strengthened by making a Register of Interests publicly available.

Colleges of Experts need to include enough members with the depth and breadth of experience to assess applications from each discipline.

There is a need for greater transparency and consistency in several areas — changes that should be easy to implement. These include:

- Making assessor scores available with the comments.
- Concentrating the number of detailed assessors to reduce variability.

- The number of applications by FOR code, and success rates, should be released immediately on grant outcome announcement. Currently, these are only available from the Grants Dataset, which is more than one year out of date.
- More detail should be routinely provided to every grant applicant on their assessment without requiring Freedom of Information requests.

**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 College of Experts seems well suited to ensure contemporary academic expertise. One concern, however, is the workload pressure in terms of peer review requests felt by some academics.

Reduction of the load could come through redesigning grant proposal formats and reviewing requirements to ensure that they are limited to what is strictly necessary for a fair and unbiased assessment, in line with best practices in other leading national science foundations.

This could include:

- **For funding assessors:** Introducing a two-step application process involving an initial two-page expression of interest (EOI), with only those clearing this stage required to submit a full application. This would mean that most assessors would only need to read EOIs, and the number of assessors required to read full applications would be dramatically reduced. Paring back requirements for full applications would mean that the time associated with reviewing them would also be reduced.
- **Recruiting assessors:** Prior grant recipients should be incentivised to assess future grants.
- **For research assessment preparers and reviewers:** Reducing the frequency of research assessments from every three years to every five years. This would be sensible given the stickiness of research performance. The assessments themselves should also be reviewed to achieve automation where possible and reduce the time required to review each submission.

Another way to alleviate workload would be to reduce the number of requests for support sent to academics by, for example, consolidating competitive funding schemes or rounds and reducing the frequency of research assessments.

**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.**

The Act should make clear the importance of peer review in the assessment of research funding applications as well as research assessment submissions.

We welcome the suggestion that ministerial decisions to overturn ARC funding recommendations be explained with published reasons as another way to reduce the potential for political interference.

**Q5. Please provide suggestions on how the ARC, researchers and universities can better preserve and strengthen the social licence for public funding of research?**

The ARC needs to develop a vision for appropriately funding research beyond the STEM disciplines to ensure that Australian research has the potential to be a global leader in all disciplines.

A critical part of strengthening the social licence for public funding of research involves ensuring that the public knows about the research and its impact.

The ABDC is focused on improving the translation skills of researchers. In 2022 the ABDC ran webinars and released a book and series of tip sheets based on in-depth interviews with 35 academics from university business schools, who understand how to build strong public profiles and share their work widely, and journalists who discuss how to overcome communication challenges and create ongoing opportunities. The book also draws on research and the ABDC communications advisor's 40-plus years of experience in journalism and strategic communication.

The ABDC is currently working on and testing with researchers a method to include consideration of communications at every stage of research. The aim is to have future communications and relevant data gathering built into projects from the start with a budget for disseminating the work.

To quote from ABDC book, *Tell us: What are you doing? Improving how you communicate your academic research, relevance and expertise:*

Traditionally, academics have sought relevance within international research communities and higher education institutions, building on the work of one another and staying abreast of deep research being conducted in their field.

Promotions have been heavily influenced by academics' articles and citations in highly ranked peer-reviewed journals that are key to boosting individual reputations and university rankings.

However, for those outside universities, articles in peer-reviewed journals are often of limited or little use.

Without external promotion, the dissemination of research findings may be confined to expert circles.

There is a global move towards more open access but, for those without academic journal subscriptions, the cost of one journal paper locked behind a paywall is often more than they are used to paying for an entire book.

Usually, journal papers are published a year or two after research is completed which – depending on the topic – can make the papers more of historical interest than contemporary relevance to practitioners.

And then there's the format of the journal articles themselves, with vital but lengthy explanations of the rigorous research methodology and a writing style that can be user-friendly only to experts already in the know.

Policymakers, influencers, industry practitioners, journalists and their audiences often need only the key points of the issue in language they understand and in a form that is easily and quickly digestible.

Some view this as 'dumbing down' academic work and providing simplistic explanations that scratch merely the surface of complex issues.

However, the ABDC argues that it is important for researchers to distil the key learnings from their work for wider use:

Communicating publicly, through the media and other forums, can have unpredictable positive and negative results. However, no one will know and comprehend what you are doing unless you tell them in a way they understand. This, in itself, may be reason enough to reach outside your immediate sphere.

There's also the view that public funding brings with it an obligation for universities and academics to work for the public good, which requires external engagement and communication.

John Ross, Asia-Pacific Editor of Times Higher Education, says: 'Academics live in the real world and want to solve real-world problems, so it's important for them to engage.'

But academic research, which stays contained in some sort of academic bubble of well-written and well-crafted journal publications, isn't going to have much impact.

'Academics live in a very competitive field – ever more competitive – and they need as many quivers in their bow as possible to demonstrate their worth,' Ross says.

'What's the point of being an academic if nobody's actually going to read your work? The best way to get people to read your work is to get it out there, and the media are a major source of that,' says Steven Rowley of Curtin Business School.

The National Education Reporter of the Australian Broadcasting Corporation (ABC), Conor Duffy, agrees that the reach of mass media is vital to academics who want to showcase their best work and put the case for public investment in universities.

**Q6. What elements of ARC processes or practices create administrative burdens and/or duplication of effort for researchers, research offices and research partners?**

Applying for funding through most ARC Schemes creates a significant administrative burden for researchers, research offices and research partners, particularly when success rates are so low. As noted in our response to question three, assessing the lengthy and detailed submissions also imposes significant overheads on reviewers.

Research assessments are too frequent and labour-intensive. The metrics they involve, particularly Engagement and Impact, have been identified and defined with STEM in mind, and do not adequately capture all ways in which HASS research is potentially impactful.

**Q7. 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?**

Possible improvements include:

- Introducing a two-stage application process. The first stage would be an EOI that is reviewed so that three-quarters of the field is eliminated and does not need to spend any more time developing a full application. The remaining applicants would be asked to submit a full application (that is considerably shorter than current requirements) with a significantly higher (e.g. ,75 or 80 per cent) success rate. A smaller field of applicants would improve efficiencies by reducing the workload on review panels and administering organisations and researchers. A two-stage process would have the added benefit of reducing the timeline between a full application being submitted and the outcomes being announced.
- Providing grant calendars that include specific dates, rather than the three-to-six-month ranges currently incorporated, to allow for planning by researchers, research support officers and research partners. These calendars need to be published well in advance, rather than in the days immediately before schemes open and should be adhered to in all but the most extenuating circumstances.
- Reducing the time between application submission and the final announcement of funding outcomes.
- Involving external reviewers (e.g., international experts from the field) and potentially incentivising them to review grants using a small stipend (e.g., \$250–\$500) to review grants.
- Abolishing or heavily reducing Research Opportunity and Performance Evidence sections, which currently deter international collaborators from involvement.

- Communicating the quality control principles associated with reviewing assessors.

**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.**

No response given

**Q8. 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?**

There is a role for research excellence and impact assessments, although the frequency and requirements for each assessment can be significantly reduced and many parts automated. Further, any assessment exercise should be as objective as possible with rules and criteria to avoid opportunistic management of submissions.

Current definitions for impact ignore the potential for:

- Impact to predate research. For example, when an academic suggests an innovation adopted by outsiders and the success or potential improvements to the initial idea form the basis of a paper
- Research to have impact twice or thrice removed. For example, basic research gives applied researchers the theoretical framework to undertake testing that demonstrates the value of changes in end-user practice and, ultimately, precipitates this change. Despite having had an impact, the basic research could not be deemed impactful under the current definitions.

Similarly, currently acceptable evidence of impact precludes many impactful pieces of HASS research from being submitted as impact cases. For example, academics whose research has shaped government policy will never be acknowledged as such in policy documents, consultation papers, etc and, unless you can get written confirmation from other involved stakeholders, it is difficult to provide causal evidence.

**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?**

No response given

**c. Should the ARC Act be amended to reference a research quality, engagement and impact assessment function, however conducted?**

This may be a reasonable thing to do, given the social licence for public funding.

**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?**

This reference should include the function of developing new methods in research assessment, and staying abreast of research practice and global insights. In doing so, the ARC should be leading best practice.

**Q9 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?**

While the ARC has a broad view of funded research and is well-informed to demonstrate the value and excellence of Australian research, the ABDC notes that researchers and universities also have an important role to communicate publicly and clearly about the application of research findings to the real world. These activities could be made more prominent in the grant proposal form.

**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?**

Some of our members question the cost-benefit trade-off associated with the ERA.