



Charles Darwin University

Submission to the Australian Research Council Act Review

December 2022



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Australia's most connected university

Charles Darwin University's (CDU) vision is to be Australia's most connected university by being courageous and making a difference in the Northern Territory (NT), Australia and beyond.

Being a dual sector university allows CDU to meet the education needs of Territorians in campuses in Darwin, Alice Springs, Palmerston and Katherine and in study centres in Nhulunbuy, Jabiru and Tennant Creek. CDU has a proud history of delivering on country in some of the NT's most remote locations, bringing training to communities who need it in places such as Galiwinku, Maningrida, Borroloola, Wadeye and Hermannsburg.

At the heart of CDU is to engage First Nations students and support their attainment of vocational and higher education. The NT spans approximately one sixth of Australia's landmass and yet is home to just one per cent of the population, of whom 30 per cent are First Nations peoples.

CDU embraces the vitality and resilience of the Northern Territory, which is the focus of the nation's most ambitious plans for future development – to unlock the vast potential of Northern Australia and to engage with our neighbours in the Asia Pacific. Due to its location, CDU is in an enviable position to contribute to the future prosperity of Northern Australia through innovative and impactful training, education and research.

CDU supports the NT Government's ambitious goal of reaching a \$40 billion economy by 2030 by leveraging the strengths of the NT and its people.

CDU has established itself as an exciting and progressive research-intensive university with a regional focus that prioritises the complex issues facing Northern Australia and the Asia-Pacific. Research Institutes at CDU including the Research Institute for the Environment and Livelihoods, the Menzies School of Health Research, the Northern Institute, the Energy and Resources Institute and their collaborative research networks, provide a strategic framework for research engagement.

CDU's research outputs consistently outperform for its size and are evaluated as being well above world standards in areas of importance to Northern Australia. In 2022, Stanford University included 24 CDU scientists within the top two per cent of most influential scientists in the world.

The Times Higher Education World University Rankings list CDU within the top 400 universities internationally, with CDU research ranking at 348 globally. Within Australia, this places CDU 28th of 37 ranked universities, despite being one of the smallest. The Times Higher Education Impact Rankings, which assess universities against the United Nations' Sustainable Development Goals, saw CDU ranked within the top 200 participating universities in the world.

Summary of submission and recommendations

The Australian Research Council (ARC) plays a fundamental role in Australia's research development and has immense impact – building Australia's research capabilities and developing career researchers. The ARC is important across the research pipeline, but has an integral role in investing in foundational, 'blue sky' research. CDU supports a strong autonomous ARC which operates under the principle of the supremacy of peer review and is at arms-length from government.

Acknowledging the maturity of the ARC and its place in Australia's research infrastructure, this submission argues there is much of the ARC's practice which could be better incorporated in the ARC

Act, rather than Directions of the Minister. Such amendments would ensure the integrity and longevity of the ARC's work.

More broadly, CDU has also contributed to and supports the Universities Australia submission to the ARC Act Review. A process to develop a Universities Accord was announced by the Minister for Education, the Hon Jason Clare MP on 16 November 2022. These processes have the potential to be highly complementary and together shape the future of higher education and research in Australia.

Recommendations

To better reflect the fundamental role of the ARC in building Australia's research capabilities, CDU recommends that:

1. the purpose of the ARC be broadened to include:
 - promoting research excellence and leadership;
 - promoting translation and impact;
 - promoting effective evaluation of research; and
 - funding projects that demonstrate national benefit.
2. the Act be amended to specifically exclude grant programs that could be funded under the National Health and Medical Research Council (NHMRC) from the scope of the ARC.
3. the Act be amended to give the ARC scope to establish new, smaller grants programs, subject to funding considerations.
4. the Act re-establish a Board to be appointed by the Minister, and a CEO to be appointed by the Board.
5. the ARC Act include the College of Experts and the expectation that appointments to the College be made by the Board.
6. the Ministerial veto be retained for exceptional circumstances with a requirement that the Minister provides a Parliamentary Statement detailing such a decision within 15 days of that decision.
7. the recently announced changes to the National Interest Test (NIT) be reviewed in two years, and consideration be given to including instead a National Benefit Statement within the peer review process.
8. the Act incorporate a stage-gated process for grant applications with an Expression of Interest introduced ahead of the proposal stage.

1. Scope and Purpose of the ARC

CDU agrees the scope of the ARC could be broadened from the existing definition, drawing on definitions elsewhere, such as the ARC's current strategic plan. Expanding the ARC's purpose in the Act would better incorporate the breadth of activities undertaken by the ARC. In particular, the scope should specify the ARC's role in promoting research excellence and leadership; promoting translation and impact; and promoting effective evaluation of research. This could achieve a stronger focus on the medium and long-term impacts of research to ensure researchers maximise the benefits of their research for end-users and other stakeholders.

As outlined at Question 5, the purpose of the ARC should also include funding projects that demonstrate national benefit, without infringing on the importance of foundational research.

CDU argues the current balance of funding between the Discovery and Linkage Program is suitable, however suggests there is an opportunity to consider a smaller grants program to fund pilot research, such as short-term studies or proof of concept research. While funding considerations are outside of the scope of this review, the Act should provide sufficient flexibility for future smaller grant rounds.

Given the strategic focus of the National Health and Medical Research Council (NHMRC), CDU supports an express exclusion of grants that could be funded under the NHMRC. This would exclude duplication of effort.

Recommendation 1

That the purpose of the ARC be broadened to include:

- promoting research excellence and leadership;
- promoting translation and impact;
- promoting effective evaluation of research; and
- funding projects that demonstrate national benefit.

Recommendation 2

That the Act be amended to specifically exclude grant programs that could be funded under the NHMRC from the scope of the ARC.

Recommendation 3

That the Act be amended to give the ARC scope to establish new, smaller grants programs, subject to funding considerations.

2. Governance and management

CDU supports the governance structure outlined in the consultation paper, that includes the re-establishment of a Board to be appointed by the Minister, and a CEO to be appointed by the Board. This replicates a commonly used, effective and efficient governance model.

Recommendation 4

That the Act be re-establish a Board to be appointed by the Minister, and a CEO to be appointed by the Board.

3. Academic expertise and peer review

The principle of the supremacy of peer review is paramount to high-quality research. To actively facilitate peer review and research quality more broadly, CDU supports the role of Executive Directors and the College of Experts. Executive Directors more readily suit an employment model within the ARC and should not need to be preserved in the Act. However, the College of Experts plays a unique role that should be enshrined in law with reference to the principles of independence and the supremacy of peer review. Appointment of the College of Experts should be the role of the Board in line with expectations of appointments under a revised Act that retain flexibility for the appointments to be effective.

Recommendation 5

That the ARC Act include the College of Experts and the expectation that appointments to the College be made by the Board.

4. Grant approval

As outlined in the consultation paper, the ARC has deep and specific expertise in research matters. This submission has already outlined the supremacy of peer review as a principle. Noting the risk of Ministerial veto to the principles of independence and the supremacy of peer review, CDU nonetheless respects the role of Ministerial approval. Ministerial veto should be reserved for exceptional circumstances and should there need to be the exercise of veto, CDU supports the provision of a statement to Parliament detailing such a decision within 15 days of that decision

Recommendation 6

That the Ministerial veto be retained for exceptional circumstances with a requirement that the Minister provides a Parliamentary Statement detailing such a decision within 15 days of that decision.

5. National Interest Test

CDU supports demonstrating national benefit when applying for research funding, although notes foreseeing and demonstrating such benefit is more difficult for foundational research. CDU recommends reshaping the National Interest Test (NIT) into a National Benefit Statement and including such a statement within the peer review process.

CDU welcomed the decision of the Minister for Education, the Hon Jason Clare MP on 1 December 2022 to simplify the NIT test and increase the word limit to 200 words. CDU recommends a review of the NIT in two years to evaluate the impact of this change.

Although not currently included within the ARC Act, CDU sees benefit in including the principle of national benefit within the Act (see Question 1). If legislated, it should be described in a way that allows flexibility for a National Benefit Statement to be incorporated within the peer review process in the future, subject to an evaluation of the recent NIT changes.

This submission has already argued for the benefit of a stronger focus on impacts of research. A tangible way to ensure that national benefit is at the forefront of researchers' applications is to require a post-project review to demonstrate how impacts will be identified and measured in the short and long-term, once the funded project is complete.

Recommendation 7

That the recently announced changes to the NIT be reviewed in two years, and consideration be given to including instead a National Benefit Statement within the peer review process.

6. Administrative Burden

CDU argues strongly for the consideration of a stage-gated approach to applications, and that this stage-gated approach be included within the legislation. Specifically, CDU recommends ARC introduce an Expression of Interest (EOI) stage that includes a smaller application of around 5-8 pages in length. Researchers would only have access once per grant round to the EOI process to ensure high-quality EOIs are submitted. CDU researchers would welcome compulsory feedback on the EOI to allow for effective refinement at the proposal stage, or if rejected, in a refreshed EOI in future grant rounds.

If an EOI is successful, then a full application would be completed. Especially for linkage projects, this would also allow additional work with partners to be completed after the EOI stage.

Recommendation 8

That the Act incorporate a stage-gated process for grant applications with an Expression of Interest introduced ahead of the proposal stage.

CDU researchers also identified administrative activity which is burdensome and/or duplicative and could be improved by the ARC outside of the Review of the Act. Should the Act be amended following this Review process, it would be worthwhile to consider a fulsome review of administrative procedures undertaken by researchers in the application process to reduce regulatory burden.

7. Process Improvements

There are a range of process improvements available to the ARC, largely outside of the scope of the Act. While CDU supports the strengthening of research impact through co-design, collaboration and partnerships, arbitrary collaboration is unfruitful. With this in mind, CDU emphasises the importance of considering the breadth of research and institution size when considering grant requirements. In particular, CDU cautions against any approach that favours research-only academics, as smaller universities may require staff to hold research and teaching loads. It is important also that funding is provided along the research pipeline from early career to senior levels.

8. ERA and EI

CDU agrees with the proposition in the consultation paper that the ERA assessment exercise has served its purpose to shift the focus of Australian research to quality rather than quantity of inputs. The use of ERAs can lead to a ranking exercise which possibly diverts from meaningful and practical research activities.

Noting the ERA and EI processes are not required by the Act, CDU recommends that the ARC Act is amended to reference a research evaluation within its scope (see Question 1). CDU believes there is an opportunity to develop this function utilising best-practice methods and drawing on international expertise.

In terms of quantitative assessment of research excellence, a national repository of research outputs could be captured largely automatically and would provide basis for assessing quality of research across Australian universities and other research organisations. Publication metrics can largely be sourced from bibliographic databases and other public sources, which can often also support allocation of field of research codes. Automated processes could ensure that current reported staffing at universities is cross-referenced to the publications data, along with research income and expenditure to support productivity measures. This would provide opportunity for evaluating, and supporting, collaboration practices across the university sector and internationally.

Where needed, specific additional information could be provided on an optional basis, including for specialised areas, such as across peer review disciplines, non-traditional research outputs and First Nations research. This may also encourage discipline-specific and interdisciplinary discussions on evaluating research excellence and impact in specialist areas.

This approach would lessen the administrative burden on Australian universities. Meanwhile, ARC expertise and insights could provide a function to support universities to enhance their research excellence and quality in specific areas.

9. Evaluation capability

CDU supports including the importance of using its evaluation data to further increase knowledge and disseminate knowledge in the scope of the ARC's functions in the ARC Act. The suggestions incorporated in the discussion paper are such examples of programmatic and project work that could be undertaken by the ARC under such a legislative mandate.

The ARC gathers a wealth of evaluation data that can be mined and used of evidence of impact and return on investment. The ARC's ability to capture this evidence and communicate it widely and effectively is fundamental to strengthening the social licence for publicly funded research. Insights and evaluation from the ARC could support strengthening of research areas relevant to national benefit. This information could be used to identify gaps and opportunities at a national level and to support allocation of funds in an equitable way.

Conventional research publication metrics only provide part of the picture for evaluating research excellence and impact; while a data-driven methodology based on publication metrics may provide indicative relative excellence and academic impact, it does not support equitable evaluation across all disciplines, or take into account local and regional conditions and characteristics.

10. Other Comments

CDU welcomed the acknowledgement of First Nations knowledge in the discussion paper. First Nations knowledge adds critical value to the future research landscape in Australia and CDU would welcome further collaboration with the ARC to improve the acknowledgement and inclusion of First Nations knowledge in research priorities.