

6 November 2023

**ARC Review Implementation** Department of Education CANBERRA ACT 2600

## Submission by ARMS to the "ARC Act – proposed amendments consultation"

The Australasian Research Management Society (ARMS) is the premier Australasian association of research management professionals. Since its founding in 1999, the ARMS network has grown to involve more than 3500 members from universities, independent research institutions, government and health and research organisations from across the Australasian region including Australia, New Zealand and Singapore.

All Australian universities that are funded through the Australian Research Council are members of ARMS. In that regard, Directors of Research Offices as well as research management professionals actively involved in ARC Grant development, review, submission and management are members.

Please find below brief responses based on our experiences in research management.

## Establishing a clear purpose for the ARC and the role of the Board

ARMS supports the amendments to the Objects of the ARC as set out in the Consultation paper. Our only comment is that we note that there are discussions in a national security setting context (eg Defence Trade Controls Act Review) which may result in potential modifications to definitions in relation to fundamental/basic/applied research. We urge the Australian Government to adopt a consistent approach to definitions across Acts and agencies to avoid confusion for both researchers and research management professionals.

In respect of the role of the Board, the proposed functions are appropriate for the Board, but we query the process for the approval of funding rules as discussed further in the next section. With respect to the composition of the Board, which is intended to be skills-based, it is important to acknowledged that research management is a significant skill in its own right. In that regard, we urge that this is acknowledged in the skills-mix of the Board. Some ARMS members with over 20 years' experience will have seen tens of thousands of funding applications and through their institutions, will have had responsibility for billions of dollars of ARC funding.

## **Approval of Funding Rules**

ARMS notes that the intention is that the Board will provide advice to the Minister in respect of funding rules (grant guidelines) and that is proposed that the approval process for funding rules will be to place them before Parliament as disallowable instruments. The intent of this is to strengthen the integrity of the grant allocation process and protect the system from unwarranted political interference. In this regard, ARMS would like to express our concern with disallowable instruments.

AUSTRALASIAN RESEARCH MANAGEMENT SOCIETY













## Concerns with disallowable instruments

As set out in the Parliamentary procedural advice, Funding Rules are tabled in Parliament for 15 sitting days and during this time period, any member of Parliament may seek to disallow the Guidelines through a motion placed before Parliament. If anyone raises an issue in that 15-day period, then unless the motion is withdrawn (i.e. the person making the motion is convinced to withdraw), it would then be voted on by the Senate, so the Senate needs to sit and vote (hence the timing needs to also work for the Senate being available). It is not clear whether this process would occur every time there is a change to the Funding Rules. Our concerns are as below:

This process is not timely

- As per the current <u>calendar</u>, no house sits for 15 days at a time, so normally the tabling
  of Funding Rules would cross over into the next month. If the issue is tabled, and the
  motion is carried, then the Guidelines cannot return to Parliament for a further six
  months
- This potentially puts at risk Australia's national funding program for all non-medical research.

This process does not guarantee unwanted political interference

• When the Government does not hold a majority in its own right, it may need to negotiate with other parties and elected representatives. While the approval of ARC Funding Rules should be non-controversial, it is possible that this approach will subject the ARC to more politicisation, rather than less, and may create significant uncertainty for the ARC in terms of implementing programs. It places the research funding system at greater risk than the current approach.

As the peak body for research management professionals, who seek to ensure the effective and timely operation of ARC's funding programs, ARMS is very concerned that this approach will not deliver the outcomes that are intended especially when an overarching intent is to deliver greater agility and flexibility.

We note that this proposed approach was not discussed in the ARC Review or government response – but most researchers and organisations (at an institutional level) are not as concerned with the implementation mechanisms of the Funding Rules as are research management professionals who deal with them on a daily basis. We suggest that the Board considers and recommends directly to the Minister approval of the Funding Rules. Parliamentary scrutiny can occur through the tabling of the ARC Annual report, the Minister's Statement of Expectations before Parliament and regular reporting via the Senates Estimate Committee, as occurs now.

We thank you for the opportunity to make a submission to the review. If you require any clarification, please contact us via <a href="mailto:ARMSCOO@researchmanagement.org.au">ARMSCOO@researchmanagement.org.au</a>.

Yours sincerely

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