

# Submission to Australian Research Council Act 2001 – Proposed Amendments

06 NOVEMBER 2023





## ABOUT THE REGIONAL UNIVERSITIES NETWORK

The Regional Universities Network (RUN) welcomes the opportunity to make a submission to the Australian Research Council Act 2001 (ARC Act) – Proposed Amendments Consultation Paper.

RUN is a national collaborative group of seven regional Australian universities: Charles Sturt University, CQUniversity Australia, Federation University Australia, Southern Cross University, University of New England, University of Southern Queensland, and University of the Sunshine Coast.

## OVERVIEW

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Overall, RUN is support of the proposed amendments to the ARC Act, while raising several important considerations. Although RUN welcomes the opportunity to provide feedback on this important raft of impending legislative amendments and while RUN is aware of the deadlines associated with this reform, RUN believes that the less than five-working-day submission turnaround deadline is insufficient for considered and meaningful consultation.

RUN, and our member institutions look forward to working with the Government in providing feedback to the Exposure Draft when it is released for consultation in due course.

RUN supports the submission from Universities Australia.

For further information please contact RUN on 0408 482 736 or [execdir@run.edu.au](mailto:execdir@run.edu.au).

# ROLE AND PURPOSE OF THE ARC

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RUN welcomes a more robustly defined and mission-based purpose of the ARC beyond that of grants processing, as reflected in the proposed legislative amendment. RUN supports having the additional functions of the ARC reflected in the ARC Act. RUN believes that the activities outlined in the Consultation Paper are a sufficient and accurate representation of ARC's core activities.

RUN suggest that in the interests of transparency the Act be amended to require the prompt publication on the ARC website of any directions from the Minister to the ARC Board or CEO.

## **I RUN RECOMMENDS**

*The inclusion of a timed clause for publication of Ministerial direction to the ARC Board or CEO.*

# ESTABLISHMENT OF AN ARC BOARD

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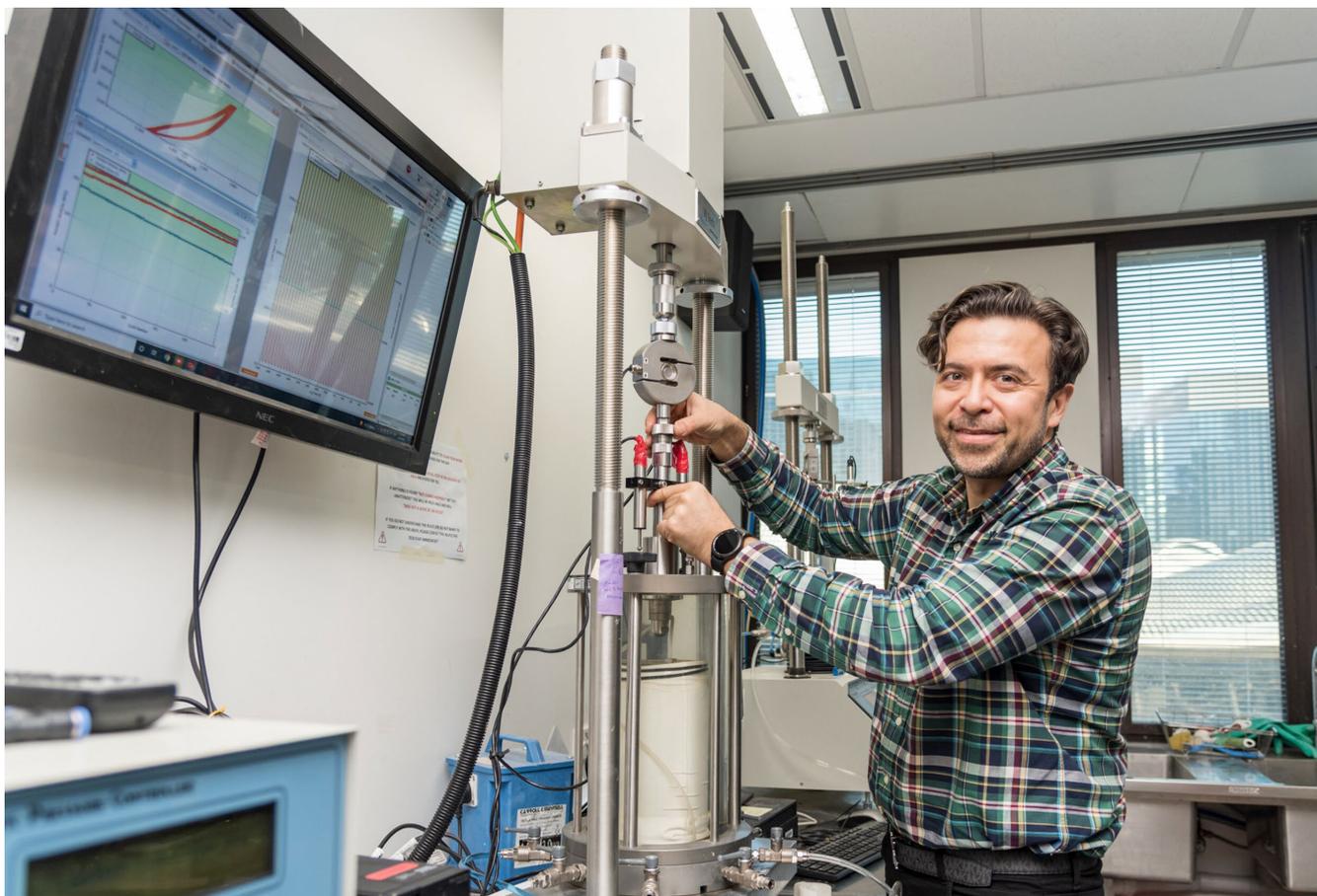
RUN is supportive of legislative amendments that ensure specific ARC grant decisions are made independently by experts based upon the peer review process, rather than the Minister.

RUN welcomes the legislative amendment that establishes an ARC Board as the accountable authority responsible for the administrative functions of the ARC. RUN supports the dedicated inclusion of a First Nations Board representative. However, RUN urges the inclusion of a dedicated appointee that can represent the needs/opportunities of regional researchers and institutions. RUN also argues the importance of ensuring a diverse range of experts are appointed to the College of Experts to ensure that perspectives of Australians who have been traditionally underrepresented in Australia's research capabilities are considered.

## **I RUN RECOMMENDS**

*The inclusion of a dedicated appointee that can represent the needs/opportunities of regional researchers and institutions on the ARC Board.*





RUN is concerned about the proposed size of the Board. Three to five members is likely to be insufficient to meet the breadth of expertise required to perform all the functions expected of it.

**I RUN RECOMMENDS**

*Increasing the size of the ARC Board.*

Finally, RUN would like to see the powers vested to the board to include a clear role in the evaluation of research.

**I RUN RECOMMENDS**

*The inclusion of the evaluation of research being an additional function vested to the Board.*

## CEO APPOINTMENT AND ROLE

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RUN supports the amendment to devolve the appointment process for the CEO to the ARC Board. This measure enhances the transparency, accountability and integrity of the process that determines the leadership of this vitally important public role.

# APPROVAL OF FUNDING RULES & GRANTS

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As a mechanism to achieve greater scrutiny and integrity in the setting of ARC funding rules, RUN disagrees with the introduction of the proposed disallowable legislative instruments as part of these legislative amendments. Making ARC funding rules disallowable by Parliament introduces a risk of delays to, or political interference with, the operations of the ARC. This would be consistent with the operations of the NHMRC and would reduce the legislative burden on the ARC.

## **I RUN DISAGREES**

*With the introduction of the proposed disallowable legislative instruments.*

RUN does not have any substantive issues with the Minister for Education retaining the ability to approve funding for nationally significant investments, in recognition of their role in creating research capability, rather than programs that award individual research grants. RUN advocates for the need for the creation of research capability to occur in Australia's regions.

## **I RUN RECOMMENDS**

*The legislative need for research capability building to occur across Australia.*

# FUNDING ARRANGEMENTS

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Increasing funding flexibility and certainty is much needed for ARC funding grants and RUN support the proposed amendments contained within the consultation paper. RUN support the proposed changes to the ARC Research Endowment Account and the changes to Special Appropriation.

RUN supports the intention to reduce the legislative burden upon the Minister by amending section 30 of the ARC Act to have the division of funding between different categories of research move from the Minister to the ARC Board. While this is not outlined directly in the Consultation Paper, RUN supports this change.

RUN would like to see a more reliably consistent, and transparent split of funding between different ARC programs as to enable a degree of surety for Australia's research sector, especially between basic and applied research. RUN recommends introducing maximum/minimum proportions of allowed funding splits between the different grant programs. Therefore, one program would not receive an excessive majority of funding, i.e. a 90/10 split. This could be established as a 65 per cent or 70 per cent maximum.

## **I RUN RECOMMENDS**

*The establishment of a maximum/minimum proportion clause in the amended ARC Act to ensure that the ARC grant programs are not unduly weighted one way or the other to maintain a healthy balance between Discovery and Linkage Programs.*

# NATIONAL SECURITY REPORTING

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RUN supports the intent of the legislative amendments that make the functions of the ARC more responsive to Australia's evolving security needs in the most transparent manner possible.

In supporting these important measures however, RUN urges that the implementation of this amendment be undertaken in such a way that minimises the administrative and regulatory burden upon individual universities while maintaining a risk-based approach to regulation and reporting.

