

Australian Catholic University

**Submission to the Senate Education and
Employment Legislation Committee**

**Inquiry into the Australian Research
Council Amendment (Ensuring Research
Independence) Bill 2018**

February 2022

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INTRODUCTION

Australian Catholic University (ACU) welcomes the opportunity to make a submission to the Senate Education and Employment Legislation Committee in relation to its inquiry into the Australian Research Council Amendment (Ensuring Research Independence) Bill 2018 (hereafter “the Bill”).

The Bill proposes to amend the *Australian Research Council Act 2001* (“ARC Act”) to remove ministerial discretion in relation to the approval of research grants and associated expenditure recommended by the CEO of the Australian Research Council (“ARC”) under Division 1, Part 7 – Funding of Research.

In its present form, the ARC Act affords the Minister the power to approve or reject a research grant that has been recommended by the CEO of the ARC, and powers relating to the approval of expenditure on research programs. Essentially, the ARC’s role is to make recommendations to the Minister, who makes the final decision regarding the approval of a proposal.

RECOMMENDATIONS

ACU recognises the underlying intent of the Bill is to prevent political interference in the allocation of research funding. This is a worthy aim.

The ARC is established as an independent body under the ARC Act and has a specialised and dedicated role to scrutinise research grant applications. Its processes are transparent, rigorous and robust.

ACU therefore endorses the rationale underlying the Bill and affirms the strength of the ARC’s existing assessment processes. In general terms, ministerial intervention in decisions relating to research funding grants should be opposed, particularly where such decisions may be politically or ideologically motivated.

Furthermore, ACU stresses that the reputation, quality and ongoing competitiveness of Australia’s world class research rests on the integrity of its research system. Substantially, this includes the integrity of decision-making on the funding of research.

If the government holds concerns about the ARC’s decision-making, these ought to be addressed directly, and transparently, via a coherent review of its assessment processes, rather than ad hoc ministerial interventions.

At the same time, it is ultimately the elected government which must account for the expenditure of public funds. The principle of responsible government is a fundamental tenet of Australia’s Westminster system of parliamentary democracy. Under this principle, ministers are accountable to the Parliament, and ultimately, to the people for decisions taken within their areas of portfolio responsibility. This includes the actions of departments or agencies within their control. The absolute elimination of ministerial discretion over the allocation of public funds – as proposed by the Bill – would break this nexus between responsibility and accountability.

ACU therefore recommends that the Bill be amended to require the Minister to take into account – and give appropriate weight to – the recommendation of the ARC CEO when considering whether to approve a proposal for research funding.

Should the Minister then decide to substitute their own judgement in place of the recommendation of the ARC CEO, the Minister should be required by legislation to:

- make such a decision within a specified time limit; and
- table in the Parliament clear and detailed reasons for their decision in the interests of transparency and public accountability.

Fundamentally, ACU considers that any reforms to the ARC Act should promote the principles of consistency and public accountability regarding the allocation and administration of public funding for research.

Given the ARC's expertise and the rigour of its processes, any exercise by the Minister of discretion to override a recommendation of the ARC should be a solemn and exceptional occurrence. It should also be accompanied by transparency to ensure maximum accountability for such decisions.

Furthermore, the Minister should be required to advise on any decision to exercise their ministerial discretion in a timely manner, in the interests of supporting the efficient administration of research grants. ACU notes that ministerial decisions to veto research grants in recent years has delayed the ARC's grants processes. The most recent decision to veto six research grants, declared in late-2021, was the longest delay to an announcement of ARC grant recipients in 30 years. Such delays have the potential to adversely impact on research projects and researchers, who rely on critical ARC funding to progress their work. Efficient administration is an integral component in supporting the delivery of high-quality research in the national interest.

UPHOLDING THE INTEGRITY OF THE AUSTRALIAN RESEARCH GRANTS SYSTEM

In addition to the recommendations above, ACU endorses statements by Universities Australia that Australia's ongoing international competitiveness in research and innovation requires a strong and respected granting agency.

Decisions around research grants are best made by relevant experts, supported by a strong quality assurance system, and grounded in the principles of excellence, transparency, accountability and the promotion of research quality. The ARC's current assessment processes promote these objectives.

The ARC serves an important function as the primary source of advice to the Federal Government on research matters, including the appropriate direction of public funding to support research in the national interest. This is in keeping with the functions of the ARC as articulated in its founding legislation, namely, to provide high quality recommendations to the Minister with respect to the funding of research programs and the administration of relevant financial assistance regimes (ARC Act, Section 3). The National Competitive Grants Program administered by the ARC constitutes a major component of the Federal Government's investment in national research and development.

The ARC administers rigorous, independent and competitive assessment processes, which have been fine-tuned over time to ensure public funding is utilised efficiently and directed fairly to research which delivers cultural, economic, social and environmental benefits to the Australian community. These processes operate according to established schedules to support the timely administration of research grants.

Appropriately, the ARC draws upon a considerable body of expert assessors to short-list applications for research funding, and scrutinises research grant applications against clearly articulated eligibility criteria, rules and compliance requirements, including a National Interest Test. This is supported by carefully calibrated mechanisms and administrative provisions to ensure applications are fairly assessed, and that the assessment process is sufficiently robust, including through:

- anonymous peer review;
- management of conflicts of interest;
- mitigation of potential bias; and
- opportunity for applicants to respond to written comments by assessors.

ATTACHMENT A - Australian Catholic University Profile

Australian Catholic University (ACU) is a publicly funded Catholic university, open to people of all faiths and of none, and with teaching, learning and research inspired by 2,000 years of Catholic intellectual tradition.

ACU operates as a multi-jurisdictional university with eight campuses, across three states, one territory, and overseas. ACU campuses are located in North Sydney (NSW), Strathfield (NSW), Blacktown (NSW), Canberra (ACT), Melbourne (Victoria), Ballarat (Victoria), Brisbane (QLD), and Rome (Italy).

ACU is the largest Catholic university in the English-speaking world. Today, ACU has around 33,000 students and 2,000 staff.¹

ACU is ranked first in Australia when it comes to graduate employment outcomes.² ACU graduates demonstrate high standards of professional excellence and are also socially responsible, highly employable and committed to active and responsive learning.

ACU has built its reputation in the areas of Health and Education, educating the largest number of undergraduate nursing and teaching students in Australia³ and serving to meet significant workforce needs in these areas.

ACU has four faculties:

- Health Sciences;
- Education and Arts;
- Law and Business; and
- Theology and Philosophy.

ACU is committed to targeted and quality research. ACU's strategic plan focuses on areas that align with ACU's mission and reflect most of its learning and teaching: Education; Health and Wellbeing; Theology and Philosophy; and Social Justice and the Common Good.

To underpin its research intensification efforts, ACU has appointed high profile leaders to assume the directorships, and work with high calibre members, in its research institutes.⁴ ACU is a world-leading research university in its priority areas of education, health, and theology and philosophy.

¹ Student numbers refer to headcount figures while staff numbers refer to full-time equivalent (FTE).

² QILT 2021 Graduate Outcomes Survey, Longitudinal, full-time employment (September 2021).

³ Department of Education, Skills and Employment, *2019 Higher Education Data Collection – Students, Special Courses*. Section 8, Table 8.3.

⁴ See Australian Catholic University, 'Research at ACU' via <http://www.acu.edu.au/>.