



15 January 2024

**Senate Education and Employment Legislation Committee
Australian Research Council Amendment (Review Response) Bill 2023 [Provisions]
Submission from the Council for the Humanities, Arts and Social Sciences (CHASS)**

About CHASS: we are a peak body with a membership of over 50 humanities, arts and social sciences (HASS) organisations, including academic discipline associations, universities and members from HASS associated industries.

This submission was authored by Matthew Champion, Ilana Mushin, Dan Woodman and Frank Bongiorno on behalf of the Board of CHASS.

(a) Promoting a Strong and Vibrant Research Culture

CHASS welcomes the expanded definition of the role of the ARC's role, notably to 'promote and conduct activities to shape and foster the Australian research landscape and community'. This addition, advocated strongly by the CHASS in its submission to the review of the *ARC Act 2001*, brings the ARC's role more closely into line with similar bodies and councils elsewhere. We believe the new ARC Board will be ideally placed to play a leading role in this important mission, which must include the strengthening of the academic research workforce. One major challenge will be to **devise adequately funded programs and activities that operationalise the goals of strengthening Australia's research culture and demonstrating to the public the 'economic, social, environmental and cultural benefit' of ARC-funded research.** This will depend, in the first instance, on much closer collaboration and consultation between 'the centre' – the ARC itself – and the individuals and organisations engaged in funded research, including through representative bodies such as our own. It will also demand more productive dialogue between the ARC and the wider community, which has sometimes only learnt of the existence of the organisation when Ministers have vetoed grants, most commonly in the humanities, arts and social sciences (HASS). Raising the profile and enhancing the social license of Australian research will also necessarily depend on improving public access to ARC-funded research through better funding of its dissemination via Open Access arrangements.

We note that the legislation includes provision for the ARC's role in 'evaluating the excellence, impact and depth of Australian research'. The ARC must be able to ensure that the projects which it funds have been carried out in accordance with their terms. There is also a need to support the necessary data collection and articulation of benefit that will underpin successful advocacy for research to the Australian public. **CHASS does not, however, support elaborate reviews of research impact and assessment.** The experience of such reviews, e.g., REF in the UK, and the ERA in Australia, suggests that these exercises are costly, often gamed by institutions, and waste resources that would be better deployed elsewhere. They are a drag on research and innovation.

(b) Scope of Research Funding

The *ARC Act* has previously been unclear about the scope of research funding supported by the Council. From the point of view of the HASS fields, to which basic research is integral, this lack of clarity raised the concern that resources were too easily shifted to applied areas that marginalised HASS disciplines. CHASS supports research across basic and applied fields. We therefore welcome the inclusion of the following purpose: to 'administer funding of excellent pure basic research,

strategic basic research and applied research in all disciplines under the National Competitive Grants Program, except experimental development'. We note that the Minister will be responsible for approving funding rules consistent with the Act and that central to this task will be 'to rebalance the focus of the ARC between basic and applied areas of research'. The international evidence reveals that basic research in HASS and STEM drives innovation across multiple spheres essential to the flourishing of social life. **The Council should be required consult regularly and widely within the university sector in setting priorities that will strike this critical balance between pure and applied research, recognising their interdependence.**

(c) Ministerial Veto

CHASS endorses the initiative of an ARC Board to secure 'the independence and integrity of the ARC and its decision-making processes' and welcomes the transfer of responsibility for approving grants from the Minister to the Board. HASS disciplines have been the principal targets of Ministerial interference in the past and should therefore gain a measure of protection from this change, which will reduce the confusion between academic and political judgement. We welcome the preservation and strengthening of peer review and agree that decisions about funding should be based on research excellence. Grant rounds should not be opportunities for political performance.

We welcome the move towards some codification of these situations in the Act and agree that there should be a process for Parliamentary oversight. The veto should only be possible in certain bounded (and highly unusual) circumstances:

1. Where the Board has failed to follow the due process;
2. Where additional information about a grant or proposed grant holder has come to light that may require an application to be reassessed;
3. Where the project can be shown to pose a genuine threat to national security.

Ministerial justifications of a veto should address at least one of the categories.

We note that the Minister can decline to approve a grant where the 'security, defence or international relations of Australia' are relevant, but we also see dangers in an expansive understanding of these fields, especially 'international relations'. It is essential to academic freedom and a democratic society that the decisions of funding bodies facilitate critique founded on evidence-based research in HASS disciplines. It is not their role to enhance Australia's international relations or to act as purveyors of 'soft power'. **We suggest that the legislation should retain the Minister's power, in exceptional circumstances, to decline to approve a grant in relation to 'security' and 'defence' but that 'international relations' might be amended to 'international obligations of Australia'.**

(d) Composition of the ARC Board

We find the provisions for appointment of members of the Council lacking in clarity in relation to the expertise required of Board members. While we understand the need for some flexibility here, and recognise the potentially important role to be played by members drawn from industry and the wider community, the provision that 'a majority of the Board members are persons whom the Minister is satisfied have substantial experience or expertise in one or more fields of research or in the management of research' does not specify standing in the academic community or any familiarity with specifically university-based research systems. It is an unfortunate reality of modern life that the term 'research' is applied to many activities that are not regarded by reputable experts as sufficiently grounded in sound methodology to warrant such a label. We are concerned by the lack of any specific provision for experience of, or familiarity with, university-based research systems and practices in the bill. We believe, therefore, that **there should be some specific provision for university standing and expertise for a majority of members. This would be achieved by the addition of the words after 'research' to 12(4)(a): 'in a university environment'.**

While welcoming the other provisions for diversity, such as those involving Indigenous representation, regional, rural and remote Australia, and ‘the general community’, we are unable to understand why no specific provision is made for experience in the broad areas of research represented by the ARC. Specifically, **there should be provision for expertise across HASS and STEM disciplines to ensure diversity in the Board's composition. This would be achieved by adding a provision: ‘ensuring that the members reflect the diversity of fields of research’.**

More generally, the Board structure should be articulated to codify requirements of meaningful consultation with the sector, including peak bodies, learned academies and universities, so that the ARC Board is trusted as representative of the country’s most significant thinkers and academic leaders.

In accordance with this basic principle, **appointment of the College of Experts by the Board should continue to occur via a process of application with an emphasis on transparency of process.**

(e) Conclusion

CHASS welcomes this opportunity to contribute to recalibrating the ARC's structure and function by commenting on the Australian Research Council Amendment (Review Response) Bill 2023 [Provisions]. We are hopeful that the future of the ARC will allow further avenues for peak bodies such as ours to contribute to its success.