Review of the Australian Research Council

A response by the Australian Council of Deans and Directors of Creative Arts (DDCA) in consultation with Australian Council of University Art and Design Schools (ACUADS) and The Australasian Association of Writing Programs (AAWP)

Suggested Introductory text if there is a place for this – if not to be included in response to first question

This submission is made on behalf of the Australian Council of Deans and Directors of Creative Arts (DDCA), representing practice-based disciplines spanning visual and performing arts, creative writing, screen production and design, with specific input from the Australian Council of University Art and Design Schools (ACUADS) and The Australasian Association of Writing Programs (AAWP). Reference to DDCA in the following responses includes ACUADS and AAWP as primary contributors.

1. Scope and purpose of the ARC

Q1. How could the purpose in the ARC Act be revised to reflect the current and future role of the ARC?
   a. **the scope of research funding supported by the ARC;**

   The DDCA does not advise that the scope of research funding supported by the ARC be amended in legislation, however it urges the ARC to include specific reference to the need for all research disciplines and methodologies to be supported and, unless specifically stated for a limited number specific schemes, the ARC should aim to seek an equitable balance of funding allocation across disciplines. This is especially important in relation to practice-based creative arts disciplines as there is still a significant gap in coverage of creative arts-based research and research leadership support. We acknowledge that flexibility in the scope of research funding is necessary to reflect the changing research landscape, the emergence of new disciplines, and developments in interdisciplinary research. In these areas at present, the lines between the ARC's current approaches to included and excluded research areas are becoming increasingly blurred. We would urge the ARC to seek to ensure that practice-based creative arts research is fully represented in all that the ARC does.

   b. **the balance of Discovery and Linkage research programs;**

   The DDCA does not believe that the balance of Discovery and Linkage research programs be mandated in the Act. While a balance between diverse modes of research is critical to a healthy research ecology, there should be flexibility across the schemes to ensure that if new opportunities or critical demands arise there is flexibility to respond**.**

c. **the role of the ARC in actively shaping the research landscape in Australia;**

The ARC's role in actively shaping the research landscape in Australia should not be specified in amended legislation. It is not possible for the ARC to have oversight over that immensely complex research landscape, across all disciplines, partnerships, institutions and opportunities. It is therefore not appropriate that it be formally charged in legislation with shaping the Australian research landscape or 'system' as implied by the ARC Strategy 2022-25. However, as suggested in previous responses, the ARC should seek to include explicit reference to providing support across the range of disciplines and methodologies to assist those areas that have not fared well to date.

d. **any other functions?**

The DDCA suggests that there is also reference to research capacity building, research mentoring and research leadership, to position the ARC in a competitive and more collegial space of collective national interest. The ARC may also wish to consider, in consultation with First Nations researchers, the need for the Act to include an explicit objective to support funding of research by Aboriginal and Torres Strait Islander Peoples as individuals and teams through providing funding to research projects that aim to expand Indigenous knowledge systems and provide economic, commercial, environmental, social and/or cultural benefits for Australia.

2.   Governance and management

Q2.   Do you consider the current ARC governance model is adequate for the ARC to perform its functions?

DDCA does not consider the current ARC governance model as adequate to perform its functions.

If not, how could governance of the ARC be improved?

The DDCA recommends a new governance model to establish a Board to oversee all ARC matters and report to the Minister. A Board will provide a greater level of oversight, representation, transparency, responsiveness and accountability than the current governance model. The Board must be inclusive of a range of disciplines and methodologies/knowledge systems. Members of the Board should have earned their place in research and research leadership, be informed about what it is like to interact with the ARC (and undertake research more broadly). It is crucial that it be written into the governance model that the position of the CEO is, in the opinion of the Board, experienced in research, knowledgeable and supportive of different disciplinary methodologies, and held in high regard by the academic research community as a whole. Relatedly, to the extent possible in the Act, provision should

be made to ensure that the position of CEO includes an attractive remuneration package so as to genuinely attract high-profile members of the Australian research community .

Please expand on your reasoning and/or provide alternative suggestions to enhance the governance

Board membership expertise might be garnered from areas of strategic importance, such as interdisciplinary research and end-user-informed/partnered research. The DDCA considers it imperative that the creative arts be represented – noting that 'the arts' more broadly is not the same as the creative arts; while they are research companions, they have different methodologies and research output types. We wish to reinforce that the position of CEO is an important national leadership role, and it is crucial the appointed person is experienced in research and research leadership, has the full confidence of the Australian research community (and the Board), and is adequately remunerated for their work.

3.   Academic expertise and peer review

Q3.   How could the Act be improved to ensure academic and research expertise is obtained and maintained to support the ARC?

There should be a clear expectation that Executive Directors and College of Expert members have excellent academic credentials and are experienced in the peer review and mentoring of research. This is because those involved with the ARC's leadership should have experience in mentoring and/or leading research teams and groups rather than individual-based 'solo' researchers. The ARC may wish to consider those who have been part of discipline peak bodies and associations, to encourage those who have actively championed research for others and who have built the research discourse of a field. This will help to get the best and most collegial players at the table – those who have a track record in research service (national) and researcher development, not solo researchers with little experience in leadership.

How could this be done without the Act becoming overly prescriptive?

Selection Criteria should include 'evidence of research leadership and impact on the capabilities and achievements of others', equally important as receipt of research funding (which may privilege certain disciplines) and ERA results (which may privilege certain disciplines and research output formats). The ARC should seek to appoint active researchers with recent research experience to leadership positions.

To the extent possible in the Act, provision should be made to ensure that working conditions, salary provisions, fractional appointments to allow researchers to maintain active research careers, and secondment arrangements for Executive

Directors and members of the College of Experts, are suitably attractive and workable so as to genuinely attract Australia's most highly respected researchers to these important roles.

4. Grant approval

Q4. Should the ARC Act be amended to consolidate the pre-eminence or importance of peer review?

The DDCA strongly supports the proposal for the ARC Act to be amended to consolidate the pre-eminence and importance of peer review. The Act should make it clear that the College of Experts is the pre-eminent authority and that Ministerial interference should occur in extraordinary circumstances only. In such cases, the Minister must be obliged to notify that intervention and give reasons in detail to the Parliament, in addition to their obligations under guidelines, senate orders and the provisions of any other legislation.

5. National Interest Test

Q5. Please provide suggestions on how the ARC, researchers and universities can better preserve and strengthen the social licence for public funding of research?

The DDCA strongly rejects the need for a National Interest Test as part of funding assessment. The value and potential benefit to the community of a proposal is already taken into account, judged against the selection criteria by peer reviewers, selection advisory committees, and the ARC CEO and Executive Directors. This is how it should be. It is not possible, nor should it be, for the benefits of all research to be reduced to a simple nationhood statement. The ability to write a national benefit statement is an exercise in research translation and written communication skills and should not be required of researchers whose skills in conducting the proposed research to experts able to assess the capacity of success for the research is more important than providing simplistic descriptions to lay readers. While university research offices might be required to provide a plain English summary statement for the benefit of the Australian public for funding announcement purposes, such a statement should not be used as a test, should be written in collaboration with qualified communications professionals, and should NEVER prevent an application that has already been recommended through peer review processes from receiving ARC funding.

6. Administrative burden

Q6. What elements of ARC processes or practices create administrative burdens and/or duplication of effort for researchers, research offices and research partners?

Research Grant Funding: Applications for Category 1 funding never cover actual costs associated with producing them. When taking into account academic time, research office support, and grant development and editing, such grants always run at a loss. Much time is spent developing and submitting grants, which makes the process cumbersome and very inefficient. We suggest an EOI process for large competitive grants – perhaps a short overview/Project Description and CVs – to save significant amounts of time, energy and anxiety associated with ARC funding applications. This would also support a more equitable field of applications, eg supporting those with caring or community responsibilities. The ARC may also wish to explore whether a return to the previous "ARC Small" grants scheme may be appropriate for some aspects of research, whereby the institutions themselves are allocated funding to fund smaller projects, with a requirement of reporting to the ARC on disbursement.

The ARC should strive to ensure that budget requests be fully funded. If a budget is considered overblown, that should be addressed in the assessment process, pushing that application further down in the ranking and preventing projects without efficient, transparent and properly costed budgets from being awarded grants. Budget cutting of properly designed and costed projects only damages the capacity of researchers to properly fulfill their vision for the work.

The scope, currency and usage of Australia's Science and Research Priorities needs urgent review. These priorities routinely and structurally disadvantage researchers in the humanities and creative arts. Further, important global (or indeed local) scale research does not necessarily display an immediate distinct **national** focus yet will contribute benefit to Australia. Timeliness and urgency of a research project, along with its benefit (national, local or international), is already articulated in funding applications and assessed by peer review: accordingly, peer reviewers and the College of Experts must be trusted to be able to judge current research priorities for their own disciplines. The DDCA, in consultation with its member peak bodies, argues strongly for the dissolution of Australia's Science and Research Priorities as a way of prioritising one application over another.

The amount of administrative time that is spent on submitting applications is increased by the institutional requirements to submit pre-application proposals internally to secure 'permission' to submit to the ARC. This institutional 'second-guessing' adds to the administrative burden, can act as a disincentive to submission, and raises concerns that certain disciplines or projects may be privileged over others. The ARC may wish to explore ways in which it can ensure and encourage transparent and less onerous internal processes that allow all disciplines equality of opportunity to apply for ARC funding.

7. Process improvements

Q7.   **What improvements could be made:**

a. **to ARC processes to promote excellence, improve agility, and better facilitate globally collaborative research and partnerships while maintaining rigour, excellence and peer review at an international standard?**

b. **to the ARC Act to give effect to these process improvements, or do you suggest other means?**

The DDCA suggests that the ARC explore mechanisms to expand opportunities and activities for researcher development and research excellence, particularly ECRs, MCRs and interdisciplinary teams, beyond the current major grants funding schemes. We support the re-introduction of the ARC Research Networks scheme, to seed-fund important capacity building and/or strategic projects (e.g., up to $50k). This may include dedicated travel grants for groups to meet and develop programs of research. Like the UK's AHRC Network Grant scheme, this could also foster international collaborations for bi- or multi-lateral research excellence. The ARC could also consider a small funding scheme similar to the British Academy's Travel Grant scheme to allow researchers to collaborate with national or international colleagues, for example through the form of a research residency program.

The DDCA is strongly in favour of all grant rounds being delivered on time, to a predetermined time frame. Grant announcements should not be delayed to meet government or ministerial preferred announcement timetables.

The DDCA is in favour of introducing changes that are designed to diversify the age, gender and cultural background of grant recipients as well as the range of disciplines and institutions being funded.

In the 2022 Future Fellowship round there was a disproportionate number of male applicants to female applicants (209 female to 415 male) indicating that the burdensome process of application or other factors may be creating this impact upon prospective applications from women. The ARC should urgently explore the reasons for this inequity of opportunity and develop interventions to address them. It should consider significant revision to the application sections addressing achievement relative to opportunity. The current process of fragmenting and quantifying individual career interruptions does not reflect the lived experience of those interruptions, intersectional experiences or the cumulative impact of these circumstances on career opportunities.

The current ARC schemes and guidelines also disadvantage certain disciplines. The significantly disproportionate number of STEM applications, relative to HASS, and overall funding investment points to significant issues within the ARC's processes. In the creative arts, the history of lack of ARC funding, and guidelines that do not recognise or equitably weight outputs in much practice-based creative arts research, has acted as an entrenched disincentive to apply for research support from the ARC. Not only does this remove equality of opportunity for these disciplines, the ultimate cost of these disincentives is also paid by the Australian community and industry,

which is unable to capitalise on the benefits that Humanities and Creative Arts research provides. The ARC should seek to rectify this unfortunate position quickly.

It may wish to consider, for example, schemes that prioritise historically underfunded disciplines, categories of researcher or even institution, through more targeted and regular use of Special Research Initiatives, or through the use of 'lottery' schemes to allocate funding for projects that have been included in the top quartile of 'fundable' applications through peer assessment.

The DDCA is in favour of a review of the Linkage Project scheme rules to consider how applications in the Humanities and creative arts might be better supported. For example, the scheme currently advantages cash-rich sectors of the economy such as mining and construction, where one dollar of industry partner cash enables a request of up to four dollars of ARC funding to match. In the drastically underfunded creative arts sector, industry organisations are more likely to be not-for-profits, for whom cash contributions are not feasible. Current Linkage Project rules limit funding requests to one ARC dollar for every in-kind dollar amount contributed by an industry partner, effectively limiting the ARC's capacity to invest in arts-industry Linkage Projects to comparatively modest amounts compared to other sectors. We ask the review to consider how 'exempt organisations' such as non-for-profit Linkage Projects partners might better leverage their in-kind contributions, thus enabling more ambitious ARC funding of impactful, industry-linked projects in the arts and creative industries.

8. ERA and EI

Q8. **With respect to ERA and EI:**

a. **Do you believe there is a need for a highly rigorous, retrospective excellence and impact assessment exercise, particularly in the absence of a link to funding?**

While a process to guide researchers towards quality is important, the administrative burden that it requires produces no material benefit (except esteem and stronger research environments for ARC grant applications). If the current ERA and EI processes remain, albeit revised, the ARC should explore ways for this activity to have more immediate material outcomes – for example, if not additional or weighted research funding then perhaps additional PhD scholarships.

In general, however, there are many existing mechanisms for assessing research excellence and impact, including:

- return on investment reporting to funders and partners;
- a range of reputable international university rankings (which assess different aspects of research excellence and impact);

- formal processes of expert peer review for traditional and non-traditional outputs;
- citations;
- peer-reviewed awards and recognitions for NTROs (including scholarly and industry awards).

In many ways, ERA and EI rely on the outcomes of these other international assessments adding a significant layer of cost and administrative burden with no added benefit. Moreover, there is very little value in an additional Australian assessment. Australian universities need to perform well against international benchmarks and international competitors, rather than be ranked against one another.

b. **What other evaluation measures or approaches (e.g. data driven approaches) could be deployed to inform research standards and future academic capability that are relevant to all disciplines, without increasing the administrative burden?**

New data driven approaches are not appropriate for Humanities and the Creative Arts, which rely on and require processes of peer review. Those systems of peer review are already in place through highly ranked journals and other publication outlets, competitive awards, and processes of expert peer review specific to the discipline.

Much of the current evaluation process is built around prejudicial understanding and expectations of the research environment itself. For example, in the creative arts: regional universities that have less access to major cultural institutions may be penalised for not having NTROs in 'high-quality venues'; and institutions with a higher proportion of ECRs may be unfairly judged against those with large Professoriates in the ERA evaluation. Could the ARC develop a way to better value and reward a university's research context, for example scale of evidenced community support (including in-kind), 'value for money' or 'performance against staff capacity'?

c. **Should the ARC Act be amended to reference a research quality, engagement and impact assessment function, however conducted?**

Like the UK's REF, it might be more efficient to combine ERA and EI for a collective outcome, rather than having two separate exercises. Could there also be additional measures of public engagement and training/mentoring built into this, rather than an engagement focus on dollar support (e.g., from industry).

d. **If so, should that reference include the function of developing new methods in research assessment and keeping up with best practice and global insights?**

A significant amount of academic time and institutional money is spent on preparation for ERA. From a DDCA perspective, the handling of non-traditional

research outputs (NTROs) at an institutional level, and then again at an ERA peer review level, adds a significant burden to researchers and institutions. While some disciplines use databases and data to quickly and fairly accurately gather data (on quality, impact, etc.), this is not the same in the NTRO space. Indeed there are no nationally agreed standards or processes for a) eligibility and b) quality in relation to NTROs.

The DDCA strongly recommends that a national NTRO submission and review (eligibility check) platform be developed by the ARC to ensure a level playing field across research disciplines and institutions.

The oversight of such measures to date exemplifies the lack of equity of opportunity and recognition that the ARC has accorded to practice-based creative arts disciplines, and may explain the longstanding lack of engagement by researchers in this discipline in applying for funding from the ARC, which in turn reduces success rates for this sector.

A national working party on NTRO submission, weighting and review, drawing on suitably qualified experts from relevant disciplines, could provide valuable input to such a review. Only with such a level playing field can there then be robust discussions about how NTROs are assessed for ERA. DDCA strongly recommends that 'major NTROs' – however they are defined and verified – are weighted the same as monographs, with a volume count of five. Creative researchers are disadvantaged when it comes to major research outputs, and this can cause volume threshold issues for institutions. Relatedly, there should be a review of procedures for loading NTROs into ORCiD and RMS as this currently places a considerable administrative burden on researchers in creative arts disciplines, requiring extensive manual handling.

While the DDCA supports a more cost-effective way to benchmark quality research nationally, we caution against the use of automated quantitative data approaches that will disadvantage the humanities and creative arts, where qualitative peer review remains the best measure of quality

9. Evaluation capability

Q9. **With respect to the ARC's capability to evaluate research excellence and impact:**

    a. **how can the ARC best use its expertise and capability in evaluating the outcomes and benefits of research to demonstrate the ongoing value and excellence of Australian research in different disciplines and/or in response to perceived problems?**

The ARC should actively recruit members to the College of Experts with expertise in different modes of research, including practice-based modes. First Nations researchers and communities, and developing and emerging disciplines, should not

be unduly prejudiced by the lack of representation on the College of Experts and other bodies. The failure to adequately interrogate and redefine how expertise is defined by the ARC places community benefit in research at risk.

b.   **what elements would be important so that such a capability could inform potential collaborators and end-users, share best practice, and identify national gaps and opportunities?**

The creative arts could, indeed already does, play a major role in this, bringing to the general public experiences of research that they can more easily understand. The ARC could advocate, explicitly or implicitly, for this value of the creative arts in large research projects. It could actively expand this approach to increased public understanding of research through dedicated schemes that target interdisciplinary teams and strong research participation (end-user co-design) and dissemination.

c.   **would a data-driven methodology assist in fulfilling this purpose?**

For many creative arts disciplines, a data-driven approach is entirely inappropriate and potentially damaging to disciplines that rely on processes of peer review. It also fails to take into account the complex ways in which excellence and impact in research are assessed and valued today.

For emerging disciplines, a data driven approach may have limited potential and so there would need to be much nuance and specialised 'data sets' for this approach. Again, a national working group specifically for the measurement of NTRO excellence could be developed – or NTRO representatives should be part of other working groups – to ensure that what is a leading mode of research internationally is given the focus it deserves nationally.

10. Other comments

NO OTHER COMMENTS PROVIDED