

## The University of Queensland Response to the Discussion Paper: A New Plan for ARC-Funded Research (Policy Review of the National Competitive Grants Program (NCGP))

The University of Queensland (UQ) welcomes the opportunity to provide feedback to the Discussion Paper: A New Plan for ARC-Funded Research (Policy Review of the National Competitive Grants Program (NCGP)), hereafter referred to as “the Paper”. UQ appreciates the bold vision put forward by the ARC Board, acknowledging that the Paper refreshes the scope by which stakeholders might envisage how the ARC continues to play a major role in the research, development and innovation of Australia’s future. UQ would welcome further discussion with the ARC as the consultation process continues.

### 1. Does the proposed model provide a strong and clear basis for the NCGP over the next 20 years?

UQ affirms the leadership role of the ARC in guiding, influencing, and funding excellent research, enabling discoveries that industries, governments, and other organisations can adopt and translate into practical outcomes and innovations. While the University acknowledges the ARC’s proposal to remove the divide of research activities between fundamental and applied research, it comes with the caveat that the ARC will need to protect investment in fundamental research that may not require non-academic partners. UQ welcomes the proposed rebalancing of project quality and innovation against researcher track record and understands the proposed model offers a streamlined structure that could potentially enhance accessibility, equity, and efficiency in grant allocation. Further, the introduction of an Initiate scheme that supports projects at a smaller scale will align with the ARC’s ambitions to support humanities and social sciences research, in particular, and further provide opportunities for emerging researchers establishing partnerships across all disciplines.

However, UQ has grave concerns regarding the financial sustainability of the model. It appears that the model assumes that the ARC’s financial resources can be distributed widely, with external parties covering funding shortfalls. The Paper consequently presents a model that operates in isolation from the broader research ecosystem, at a time when Australia faces significant challenges in securing industry investment in research, and the full economic cost of research is inadequately funded. Universities receive insufficient research block grant funding to cover indirect costs, and agencies rarely provide full budgets for direct research expenses.

Without clear guidance in the Paper, and a strategic commitment from governments to address these issues, universities will inevitably bear a major financial burden in order to co-invest in the NCGP options presented in the Paper. Further detail is required to understand the funding models the ARC is presenting, and asking for, in order for UQ to have assurance that the model and vision provides a sustainable, strong and clear basis for the NCGP over the next twenty years.

### 2. Does the proposed model adequately address your concerns or those expressed in the initial consultations?

The model presents some intriguing concepts that begin to address the concerns expressed in the initial consultations. However, the vision presents new concerns, including — but not limited to — sustainability; flattened and/or diffuse career pathways; a commitment to the breadth of research excellence under the ARC’s remit, the removal or potential under-funding of critical schemes, and operationalisation of the initiatives.

The ARC’s vision to support fundamental research while retaining agility to respond to government priorities, is akin to the juxtaposition of the NHMRC and MRFF. Without an injection of funding, the University is unconvinced that there is likely to be sufficient funding to achieve the ARC’s vision for bold, sustainable reform with the necessary balance of fundamental and translational research to the immediate and future needs of Australia.

### 3. Do you foresee any unintended consequences or significant risks which have not been accounted for in the proposed model?

#### 3.1. Embedded Fellowships

Federal and State governments have charged universities with the accountability and responsibility of executing both teaching and research. However, the embedded fellowships structurally and operationally devalues teaching and fails to provide sufficient career development opportunity.

Further, while UQ recognises that embedding fellowships within projects aligns with the focus on projects rather than individual researchers, the embedded fellowships concept remains unconvincing and risks reintroducing talent loss at a time when Australia is seeking to build sovereign capability in research.

Some key issues are explored below:

- The embedded fellowships appear to be more focused on teaching and administration relief, rather than on the development of academic careers. The implication is that teaching is a secondary activity to research and a distraction for our most talented researchers. This is at odds with key messaging in the Universities Accord and goes against universities' social licence and responsibilities to wider society.
- The embedded fellowships do not recognise the full diversity of academic pathway entry points into research, including enabling scholars based overseas (including Australian scholars working overseas) to establish academic careers in Australia and attracting researchers from industry and other non-academic professions into the sector.
- Structural limitations in funding opportunities mean that:
  - Grant duration lengths are insufficient to enable researchers at all career stages, particularly ECRs, to develop the research program and leadership skills that support the emergence or continued independence of career pathways.
  - By tying fellowships to project funding and mandating an ECR fellowship in every project that includes fellowships, the model inadvertently deprioritises MCRs. While UQ applauds the ARC's commitment to the ECR cohort, this restriction exacerbates an existing bottleneck where researchers struggle to transition from early- to mid-career and beyond. Without dedicated support for MCRs, there is a risk of losing experienced researchers who are unable to secure stable funding between the ECR and senior researcher stages.
- The prominence of teaching relief as a mechanism for facilitating research, combined with the shorter term and embedded nature of the proposed fellowship replacements, means that universities will need to employ additional staff to ensure teaching obligations are upheld. In many instances, this will mean an increased casualisation of the teaching workforce, directly at odds with changing Government and societal expectations in this domain.
- The Paper is silent on whether the embedded fellowship will be fully remunerated in line with higher education salary scales.

#### 3.2 Formally linking grants to national priorities and research that favours an “end-user”

- This may inhibit large-scale, multi-party research collaborations that foster research excellence and create the pipelines for research translation, ultimately stifling innovation.
- Many research outcomes include intangible benefits that extend beyond commercialised, measurable products. Nonetheless, they contribute to the wellbeing and prosperity of Australia and are intrinsic to the types of research that the ARC is beholden to sustain. As such, it is imperative that the ARC invest in a solid basis of lower technology readiness levels and fundamental research as part of our intergenerational contract with future Australians.

### 3.3 Peer Review and Assessment

- Transparency in the peer review and assessment process, with discipline-specific details, needs to be considered as part of the reforms. This aspect is perceived as obscure by some, yet it is vital to the success of an application.
- The commitment to reducing burden and increasing efficiency should not come at the cost of transparency and value of the peer review and assessment process. UQ is firm in its view that the review process should still lean heavily on experts in the field as well as the College and should maintain the rejoinder process and moderation of reviews/scores.
- The two-stage and blinded assessments concept needs to be considered carefully; for example, 'idea first' may not be viable if, at the second stage, project and/or team feasibility issues mean the idea may not be delivered. It will need close monitoring to ensure that all project positions are considered and that its evolution supports one of lower risks, higher rewards or both.
- With previously separated aspects such as industry participation and MCR vs ECR being consolidated, it is unclear how these would be assessed in the review process compared to projects without these aspects. Similarly, it is unclear how research excellence, interdisciplinary research, and applied versus fundamental research will be equitably supported.

### 3.4 Administrative Burden

- The ARC has not addressed the practical administrative burden of embedded fellowships; UQ's experience with DORAs shows that these models require significant post-award oversight and often result in compliance challenges for institutions and researchers.
- While the proposed model aims to streamline the NCGP, several elements – such as increased involvement of industry, end-users, and international partners – will almost certainly increase administrative complexity post-award. Managing Commonwealth funding with these partners involves significant contracting, variations, reporting, and compliance obligations. This is already evident in current industry-facing schemes and is likely to increase under the new model, especially in light of the recent changes to the ARC Act.

## 4. What issues would need to be addressed in the transition from the current NCGP schemes to the new model?

- Clear guidance on what is permitted and expected within each proposed scheme is essential. Given the Paper's significant departure from the current model, the transition would demand considerable time and effort from both academic and administrative personnel. To support this shift, operational guidance must be provided well in advance, allowing the sector adequate time to transition. A phased rollout, incorporating iterative feedback, would help minimise research and researcher disruption, reduce administrative strain, and mitigate unintended disruptions.
- The proposed structural changes would provide greater opportunities for conflicts of interest to arise. While UQ is of the view that the Administering Organisation (AO) should be responsible for managing conflicts of interest, the ARC should continue to support AOs by providing clear guidance on conflicts of interests.

## 5. Are there any features that you would add to, or remove from, the model?

UQ advises that substantial additional detail is required in order to address this question in an informed manner. However, some features that should be added include:

- Certainty provided as to how investment in fundamental research will be maintained sustainably.
- Stand-alone fellowships should be retained for all career stages, including senior researchers, but streamlined, and funding allocations should be reconsidered. Fellowship models such as those adopted by the [European Research Council](#) could be considered.
- Increased funding and flexibility for working with Indigenous organisations, irrespective of the scheme.
- An explicit scheme for fundamental research infrastructure is required in isolation of the proposed schemes. This would enable institutions and partners to strategically align and leverage institutional

research infrastructure priorities with ARC investments as well as aligning with and complementing state and federal initiatives.

- PhD scholarships should be maintained in all schemes and funded at the institutional rate. The proposed scheme lengths should be amended to align project length with that of PhD candidature, typically from three to four years.
- Schemes that support programmatic, excellent multi-party, multidisciplinary research programs of scale, independent of current government research priorities.
- Grants should be permitted to commence prior to all partners being bound.
- UQ supports the ARC's commitment to trialling funding tiers on the assumption that there is greater flexibility in spend. This removes substantial administrative burden and provides research flexibility within the scope of eligible funding expenditure.

Some features UQ proposes to be removed:

- Flexible embedded fellowships and teaching relief in lieu of fellowship salaries.

## 6. Do you have any feedback on the proposed grant schemes and their likely effectiveness?

The University recommends that the grant number and duration across the schemes needs to be reconsidered. Further selected feedback on the proposed schemes is below:

Scheme	Selected Feedback
Initiate	<ul style="list-style-type: none"> <li>• While the emphasis on innovative and unproven research is commendable, the two-year funding period is insufficient to achieve research outcomes for many disciplines and EMCR career development, let alone project start-ups (e.g. equipment lead times).</li> </ul>
Breakthrough	<ul style="list-style-type: none"> <li>• There is an implication in the proposal that <u>Initiate</u> grants would lead to <u>Breakthrough</u> or <u>Collaborate</u> projects, which would scale-up the research that was 'initiated' in the Initiate grant. UQ seeks clarity as to how this would work in practice. Further, the limited number of grants proposed in this scheme means it would be highly competitive. It is unclear how EMCRs will benefit from escalating through Initiate to Breakthrough.</li> </ul>
Realise Indigenous Capability	<ul style="list-style-type: none"> <li>• This scheme is highly beneficial for Indigenous researchers. However, there is concern that the limited number of awards will make the scheme too competitive. To be effective, it must support the full pipeline of both emerging and established researchers.</li> <li>• Adminstrating Organisations, Research Councils and their Indigenous advisors will need to partner closely together to support the eligibility requirements associated with this scheme.</li> </ul>
Lead and Mentor	<ul style="list-style-type: none"> <li>• UQ applauds the intent of the scheme but considers it non-viable in its current form, without appropriate incentives. UQ also seeks clarification on whether this scheme is intended for both MCR and SCR.</li> </ul>
Collaborate	<ul style="list-style-type: none"> <li>• UQ proposes that the Collaborate scheme should be run annually as the priming scheme for larger-scale, multi-disciplinary, multi-partner research activity.</li> <li>• Further, in the form the Collaborate scheme has been proposed, it does not appear to warrant being a designated program.</li> </ul>
Prioritise	<ul style="list-style-type: none"> <li>• This scheme fails to provide funding for excellent multi-party, multidisciplinary research programs of scale, independent of current government research priorities.</li> <li>• Long-term funding commitments should be established to provide stability and ensure continuity in research agendas.</li> </ul>