

**Drew Menzies-McVey**

Assistant Secretary, Australia's Economic Accelerator  
Australian Government Department of Education

**ARCReview@education.gov.au**

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Dear Ms Menzies-McVey

The Australian Technology Network of Universities (ATN) welcomes the opportunity to provide a submission on the Australian Research Council Act 2001 – Proposed Amendments Consultation Paper.

ATN welcomed the release of the review into the Australian Research Council Act 2001 (Sheil Review) because it is crucial that the ARC can do its job with confidence and with the backing of the higher education sector. It is important that the ARC provides a trusted and stable cornerstone for Australia's research system so our universities can deliver what Australia needs in terms of research and innovation.

ATN's principal recommendation to the review was that significant reform of the ARC needs to be done in conjunction and alignment with the Universities Accord, which will seek consensus on what we want from our national research ecosystem and how it interacts with other pillars of the higher education and university system.

The Accord ought to engender significant reforms of the system, so it is appropriate that the reform of ARC is part of that.

We would welcome further engagement and consideration of the interaction of the Universities Accord and the ARC and these proposed legislative changes. Specifically, how this legislation may intersect with the Accord Panel's recommendations about research funding and the establishment of a Tertiary Education Commission and its remit.

ATN makes the following comments in response to the Consultation Paper:

1. Establishing a clear purpose for the ARC

The purposes listed for the ARC tend to be focused on assurance and regulation functions. The Objects should make it clear that the ARC has a role in promoting innovation in research.

While the ARC's contribution to research quality in Australia should not be overlooked, it may be a better use of resources to concentrate its efforts towards research funding administration. This is in line with Recommendation 10 of the Sheil Review that ARC's "resources could be more effectively redeployed and utilised to guide the current and future design of the NCGP and the identification of future research priorities."

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2. Establishment of an ARC Board

The proposed Board membership of five to seven people (including the Chair and Deputy Chair) is potentially too few to adequately represent the diversity of the research sector and broader Australian community, and incorporate the range of skills and expertise required. The Board will have broad and extensive powers and so some more guidance on the diversity, background, experience and skills that must be considered when appointing Board members would be useful.

3. Approval of funding rules

While it is appropriate that the Parliament has oversight of the funding rules, the Government should consider what mitigations are in place if the funding rules are disallowed. What consequences would this have funding rounds that have been allocated, are in progress, or are due to commence shortly?

4. National security reporting

Given that opacity and a lack of knowledge sharing is a known issue in relation to national security, and the paper notes that “Australian universities hold a primary role in identifying national security risks associated with grant applications and research”, it is a missed opportunity that the proposed revisions do not appear to provide any greater transparency to universities.

The revisions would benefit from further consideration to provide appropriately secure briefings to universities themselves, which would in turn enable them to proactively identify and address national security concerns at a local level. This approach fosters greater due diligence and complements the proposed revisions.

We look forward to further engagement on changes to the ARC and the broader research and innovation system. If you need any further information from ATN or our member universities, please contact me at [info@atn.edu.au](mailto:info@atn.edu.au).

Yours sincerely,

Luke Sheehy

ATN Executive Director