

# Open Access Australasia Response to ARC Review

14 December 2022

Review of the Australian Research Council Act 2001 is [here](#)

**Q1. How could the purpose in the ARC Act be revised to reflect the current and future role of the ARC?**

For example, should the ARC Act be amended to specify in legislation:

- a. the scope of research funding supported by the ARC;
- b. the balance of Discovery and Linkage research programs;
- c. the role of the ARC in actively shaping the research landscape in Australia; and/or any other functions?
- d. If so, what scope, functions and role?

If not, please suggest alternative ways to clarify and define these functions.

The ARC and other national research funders are critically important in shaping the research landscape, including its culture, in Australia. Other countries' funders have taken a leadership role in open access and open science more generally and this is especially timely given the UNESCO Recommendation on Open Science (<https://en.unesco.org/science-sustainable-future/open-science/recommendation>), which Australia is a signatory to. Open Access Australasia submits that the ARC should be empowered to lead in open science, both through policy but also through supporting national infrastructure for open science.

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

If not, how could governance of the ARC be improved? For example, should the ARC Act be amended to incorporate a new governance model that establishes a Board on the model outlined in the consultation paper, or another model.

Please expand on your reasoning and/or provide alternative suggestions to enhance the governance, if you consider this to be important.

No comment

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

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

No comment

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

Please provide any specific suggestions you may have for amendment of the Act, and/or for non-legislative measures.

The previous ARC act was written at a time when there were limited models of academic peer review and research assessment was largely based on journal ranking systems. There are now thriving alternatives to traditional peer review - through for example review in non-journal open access platforms. These alternatives were recently recognised as being appropriate by the cOAlition S. <https://www.coalition-s.org/statement-on-peer-reviewed-publications/>

Research assessment has now changed substantially with journal ranking being only one of a suite of potential measures that are relevant for research assessment. Open Access Australasia submits that ARC should be actively engaged with relevant initiatives especially as they relate to recognising a diversity of research outputs and ways of assessment that support research openness, integrity and reproducibility.

Relevant initiatives are the San Francisco Declaration on Research Assessment (DORA) <https://sfdora.org/>, the Hong Kong Principles <https://doi.org/10.1371/journal.pbio.3000737>, and national initiatives e.g. 'Room for everyone's talent' from the Netherlands <https://www.universiteitenvannederland.nl/recognitionandrewards/wp-content/uploads/2019/11/Position-paper-Room-for-everyone%e2%80%99s-talent.pdf>

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

As one of the major funders of public research in Australia, the ARC has a key role in preserving and strengthening the social licence for public funding of research. Open Access Australasia submits that one of the most immediate ways that it can do that is by ensuring that the research it funds is made publicly available through a diverse system of open access approaches. Open Access Australasia submits that ARC should be engaged in supporting the future of open access, not just through policies but also by supporting the infrastructure that enables research to be made open. In the Australian context that should include university repositories, local no-fee open access journals and the technical infrastructure that supports these approaches.

Furthermore, as research evolves, especially with the recognition of the now very diverse range of research outputs it is essential that the ARC provides leadership in reforming research assessment beyond its current state which is based primarily on journal-based metrics.

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

Having policies that diverge from NHMRC, including for example for Open Access, is a substantial burden for researchers, research offices and other staff that support research at institutions. Divergent policies also make it very hard to monitor compliance. Aligning policies nationally and ideally, internationally, is also very likely to increase compliance with policies. Open Access Australasia submits that aligning policies should be a priority.

**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?

No comment

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

In response to part b.

Open Access Australasia submits that any evaluation measures for research outputs including any new approaches to automated coding or other data driven approaches should be open and not proprietary to any one specific commercial vendor.

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

The ARC funds a highly diverse range of research and that diversity is reflected in the huge diversity of research outputs. Open Access Australasia submits that it is essential that the ARC develops clear, equitable approaches to assessing the research outputs from the diversity of the research it funds. To do so, Open Access Australasia submits that the ARC should engage with relevant international initiatives such as DORA <https://sfedora.org/> and COARA <https://coara.eu/> to ensure that its research assessment practices are in alignment with international best practices.

Open Access Australasia submits that the ARC has a particular role in ensuring that research assessment practices support and promote and are appropriate for Indigenous knowledges and Indigenous data governance principles, such as the CARE Principles for Indigenous Data Governance <https://www.gida-global.org/care>.

**Q10. Having regard to the Review's Terms of Reference, the ARC Act itself, the function, structure and operation of the ARC, and the current and potential role of the ARC in fostering excellent Australian research of global significance, do you have any other comments or suggestions?**

There is an urgency for the ARC to review its Open Access policy to ensure that it is in alignment with international and national best practices, which is immediate open access with an open licence. Open Access Australasia submits that the ARC should aim to ensure that its open access policy is, as far as is possible, the same as the NHMRC's. In addition, Open Access Australasia submits that the ARC should clarify its position regarding use of grant funds for publication costs.

*Open Access Australasia is a membership organisation of 22 Australian university libraries, eight New Zealand university libraries through the Council of New Zealand University Librarians, Creative Commons Australia, Tohatoha Aotearoa Commons, Australian Library and Information Association (ALIA), Australian Digital Alliance (ADA), Wikimedia Australia and the Australian Citizen Science Association. Its mission is to attain open access to research in Australia and Aotearoa New Zealand through advocacy, collaboration, awareness, and capacity building across the Australian and New Zealand research sectors.*

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