

11 April 2025

The Regional Universities Network (RUN) welcomes the opportunity to provide feedback to the *Australian Research Council's (ARC) Policy Review of the National Competitive Grants Program (NCGP)*.

RUN is a national collaborative group of seven regional Australian universities:

- Charles Sturt University,
- CQUniversity Australia,
- Federation University Australia,
- Southern Cross University,
- University of New England,
- University of Southern Queensland, and
- University of the Sunshine Coast

Overview

Notwithstanding various changes that improve the NCGP, the RUN believes that the longer-term net effect of the new model will likely result in diminished NCGP grant success amongst regional universities, leading to:

- Fewer opportunities to grow the research capabilities, research infrastructure, and research services relied upon by regional Australians.
- Reduced opportunities for regional Australians to train and enter Australia's research-trained workforces – particularly those Australians from underrepresented backgrounds, who are considerably more likely to already be enrolled at a regional university.
- A continued and accelerated concentration of national research opportunity, capacity, infrastructure, and workforces towards a small handful of metropolitan universities.

In 2023, just five of Australia's 42 universities – located in Sydney, Melbourne and Brisbane – received 50 per cent of Australia's total research income¹. In contrast, the seven RUN universities – servicing a combined geographic footprint of 38 campuses – accounted for just four per cent².

Australia's most pressing R&D challenges and opportunities of the 21st century will be primarily place-based within regional Australia. Such as: the growing national interest of food, soil, water, mineral and energy security; climate change and disaster resilience; border and biosecurity; defence assets and capabilities; and our Closing the Gap targets. Regional Australia plays host to more than one-third of Australia's working-age population, generates more than one-third of national economic output, and accounts for two-thirds of Australia's export wealth³. Despite this, regional Australia has been underrepresented in Australia's research activity and sovereign R&D capabilities. Australia's R&D mindset has simply not followed the growth path and economic contributions of Australia's regions.

The Australian Universities Accord revealed the national priority and economic imperative of redistributing to regional Australia. There must be an immediate focus on a more equitable redistribution to the regions of Australia's research capabilities, infrastructure, and research-trained workforces. Smaller scaled regional universities are often unable to attract research grants due to a lack of infrastructure and/or human capital, and equally unable to build infrastructure and/or human capital due to lack of research grant funding.

RUN views the new NCGP model as a missed opportunity to arrest the continued gravitation of research opportunities towards metropolitan Australians, at the expense of regional Australians. The new NCGP will almost certainly result in Australia's largest metropolitan universities increasing their already

1 Australian Government Department of Education. Research and Development Income Time Series. 2023. Accessed via: <https://www.education.gov.au/research-block-grants/resources/research-income-time-series>

2 ibid.

3 Regional Australia Institute. Research and Policy. 2025. Accessed via: https://www.regionalaustralia.org.au/Shared_Content/Smart-Suite/Smart-Library/Public/Smart-Library-Search.aspx

disproportionate share of NCGP grant success. As such, the new NCGP should be viewed as largely incompatible with the objectives of the Australian Universities Accord.

RUN universities are disappointed that the new NCGP model contains no dedicated scheme, nor collaborative requirements or incentives, that seeks to support the research infrastructure, research capabilities, or research-trained workforces of Australia's regions and the university services they rely upon.

NCGP improvements aligned to previous concerns

RUN acknowledges and supports the proposed changes that seek to reduce the administrative burden of engaging with NCGP processes. This is especially important for regional universities whose social missions determine their sub-scaled operating environments. It also benefits the industry partners who collaborate with RUN universities. It would be particularly useful to examine ways to simplify the highly-detailed budget requirements characteristic of existing schemes.

The elevated focus on growing Indigenous research capability and capacity (including the Realise Indigenous Capability scheme), alongside more targeted support for the under-represented participants of the NCGP, is welcomed. RUN acknowledges that the highest concentrations of student cohorts from underrepresented backgrounds – tomorrow's researchers – are already enrolled at a regional university. RUN also acknowledges that a majority of First Nations Australians – approximately 60 per cent – live in Australia's regions⁴. RUN therefore supports the equity objectives of the NCGP, if pursued in an effective and meaningful way. Within the Realise Indigenous Capability, it is currently unclear whether grants will be individually awarded, or awarded to teams led by an Indigenous researcher. There is a need for greater clarity, or a consideration of ways in which appropriate teams can be formed to ensure there is support for Indigenous researcher leads. These funded projects need to genuinely build capability, research leadership, and a program of work for Indigenous research leaders. Growing Indigenous research capability also requires more Indigenous post-graduate students trained in a wide variety of methodologies across all disciplines. Encouraging Indigenous HDR scholarships in projects would therefore be worthwhile.

The utilisation of a 'two-stage, idea-first, double-blind assessment' for Initiate is supported, and RUN hopes that it will lead to assessments leaning more towards merit and less towards reputation or track record. An expansion of schemes that fund longer-duration research projects is a reflection of previous RUN advocacy. This is particularly welcomed by regional researchers who, for instance, work alongside First Nations communities, where partnership-building takes time.

RUN supports the stronger focus on supporting Early Career Researchers (ERCs), as well as the heightened risk tolerance towards funding applications. RUN had previously advocated for such a focus. And while RUN is supportive of the principle of providing more embedded fellowships, particularly if provided to ECRs, there are concerns that the model achieves this at the expense of employment certainty for the recipients. The proposed two-year fellowship duration is not long enough to build the profile of ECRs, nor provides sufficient time to deliver solid research outcomes.

The inclusion of Mid-Career Researchers (MCRs) along with ECRs in the Initiate and Realise Indigenous Capability schemes as likely leads is welcomed. While ECRs are an important focus, it is often in the MCR phase that it is challenging for researchers to continue their research momentum, with limited focused research funding or support.

Risks and unintended consequences of the new NCGP model

Today, one in every four First Nations Australians studying a bachelor degree in Australia, and one in every four students from a low-SES background, are enrolled at a RUN university. Despite the rich research talent potential currently residing within the underrepresented student cohorts of RUN universities, regional

⁴ Australian Institute of Health and Welfare, Profile of First Nations people, July 2024, accessed via: <https://www.aihw.gov.au/reports/australias-welfare/profile-of-indigenous-australians>

universities remain highly limited in their capacity to provide transition opportunities toward post-graduate research and research-trained careers due to an ongoing legacy of unscaled operations and the resultant limitations upon research infrastructure, research capacity, and research grant success. The new NCGP model does little to address these limitations to the detriment of Australia's future research workforces. In the absence of any dedicated regional scheme, or regional partnership incentives/requirements explicitly embedded within other schemes (such as Collaborate), it is difficult to see how the NCGP will deliver upon its equity objectives.

While a halving of schemes may go some way to reduce the complexity of the system, it may result in an even greater concentration of successful grants awarded to larger and more resource-intensive universities (and their ability to resource significant research office capabilities). This may also result in fewer opportunities for smaller/regional universities to find support for their pockets of emerging or established world class research with more modestly-resourced research offices.

The NCGP model fails to address the issue of inadequate PhD stipend rates, and how this prevents talented individuals from underrepresented backgrounds – including regional Australians – from embracing opportunities to participate in NCGP funded research.

The Discovery Early Career Researcher Awards (DECRA) have enabled smaller, regional universities, who lack the scale and resources of larger metropolitan universities, to overcome the financial risk of investing in a promising ECR researcher under a longer-term (three year) trial before tenured appointment considerations could be made. The shorter (two year) funding duration of the 'Initiate scheme' will erode the ability of smaller and regional universities to maintain their support of emerging regional research talent, with opportunities likely to fall instead to larger metropolitan universities who hold the resources to take higher risks and offer greater job security to cultivate their emerging research talent.

The removal of salary support in many schemes and the capping of salary contributions is a significant concern for RUN researchers who form part of high-performance research centres. This places an additional burden on existing resources, a circumstance that disadvantages smaller/regional universities.

RUN holds concerns that the absence of Linkage grants will make it more difficult for regional universities to resource new partnerships with the major place-based industries within their footprints.

The removal of the Linkage Infrastructure Equipment and Facilities Grant (LIEF) closes one of the few opportunities that regional universities had to receive funding for key research infrastructure. Despite RUN universities having underrepresented success in LIEF allocations (receiving just over 1 per cent of total LIEF funding allocations since 2021⁵), it has nonetheless been an important – and one of the few – opportunities for RUN universities to be supported in their development of critical research infrastructure via the Australian Research Council. With the funding of research infrastructure now falling under the Collaborate scheme, many RUN universities are concerned their previous success in developing critical research infrastructure and capabilities under LIEF are unlikely to be replicated via the Collaborate scheme.

Similarly, RUN is concerned the design of the Lead and Mentor scheme will also favour larger metropolitan universities, given it is more difficult – and may become increasingly more so – for smaller/regional universities to develop the stocks of Senior Career Researchers required to mentor/supervise ECRs at a scale that may lead to more proportionate grant success. Embedding most fellowships within larger projects (such as those under Lead and Mentor) may potentially lead to ECRs becoming too dependent upon a senior researcher, at the expense of developing their own project/people management skills. It is likely that larger metropolitan universities will secure a disproportionate allocation of grants with embedded fellowships, leaving smaller/regional universities with fewer pathways to develop and retain research talent, thereby compounding the drain of talented regional researchers towards our largest cities. The Collaborate and Prioritise schemes are proposed as a designated program under the ARC Act, of

which the Minister has final decision-making authority. RUN fundamentally supports the ARC Board's independence and views the risk of political interference here to be regrettable.

Currently, LIEF and Linkage grants only require a 25 per cent cash contribution, however Collaborate grants must be matched by the combined cash contributions of partners (with exceptions noted). This has the potential to be problematic, particularly for infrastructure purposes as industry partners typically do not contribute, leaving the shortfall to be absorbed by universities. This would limit the involvement of smaller/regional universities due to budget constraints. The 50 per cent cash contribution would also limit the involvement of SMEs in large collaborative projects, and most would require the involvement of larger companies, or multiple smaller companies, to meet requirements.

The opportunity for industry to participate in lower-cost research is important. In the humanities and social sciences, there needs to be greater consideration of the nature of the not-for-profit education and social service sectors who tend to have very limited discretionary R&D spend. Appropriate allowances ought to be made in these sectors for in-kind only contributions by industry partners. This is noted in the Collaborate scheme, but clarification is required to ensure it also applies to the Breakthrough scheme.

Overall, RUN believes that the short-term funding horizons, the underfunding of projects, the diminished opportunities to fund research infrastructure, and the institutional resourcing required to pursue uncertain outcomes of competitive funding programs are conditions that favour universities that are able to subsidise their research activities with income from scaled, single-campus operations within dense student markets. RUN does not believe the new NCGP is designed to meet the research needs of regional Australians, nor the university providers they rely upon to be able to participate in Australia's R&D landscape on an equitable footing to metropolitan Australians.

Recommendations to ensure the transition to the new NCGP model is made more effective

RUN provides the following recommendations to the Policy Review of the NCGP:

1. Introduce a 7th scheme dedicated to supporting the development of regional research infrastructure, regional research capabilities, and regional research-trained workforces.
2. Larger, multiparter grants administered by the NCGP – such as those funded via the Collaborate or Prioritise schemes – should carry either requirements or incentives to involve a regional university as a major partner.
3. The extension of the Initiate scheme's 'two-stage, idea-first, double-blind assessment' to as many schemes as possible, while balancing matters of researcher/institutional capability.
4. Consideration should be given to where NCGP grants can be tethered to the institution, rather than to the researcher, to address the frequent problem of emerging research talent being poached by other universities upon the successful acquisition of an NCGP grant.
5. Extending the duration of 'Initiate' scheme allocations for ECRs from two to three years (alongside the corresponding increase in funding) would represent more realistic timeframes for ECRs to establish reputation and build track record.
6. Provide a clearer transition plan outlining the timeline of implementation for the new NCGP to provide greater sector certainty.
7. When transitioning to the new NCGP model, funding and conditions for current NCGP projects must be maintained for the life of the grant, to maintain certainty for participants.
8. Examination of mechanisms that allow consumables and staff costs, incurred by offshore collaborators, to be covered by the NCGP.
9. Consideration of discipline-specific funding mechanisms to ensure fair competition between HASS and STEM fields.
10. A clarification of funding priorities to ensure that both curiosity-driven and applied research projects are supported.