

POLICY REVIEW OF THE NATIONAL COMPETITIVE GRANTS PROGRAM

RESPONSE TO NCGP DISCUSSION PAPER: A NEW PLAN FOR ARC-FUNDED RESEARCH

11 April 2025

About Science in Australia Gender Equity (SAGE)

SAGE is Australasia's leading advocate for equity, diversity and inclusion (EDI) in the education and research sector. Founded by the Australian Academy of Science and the Australian Academy of Technological Sciences and Engineering, we provide institutions with Gender EDI accreditation under the world-respected Athena Swan program.

This submission is supported by SAGE's Research Grants and Funding Advisory Group.

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This submission addresses Questions 1, 2, and 3 from the "Have Your Say" section of the NCGP Discussion Paper. Specifically, it examines whether the proposed model offers a solid and clear foundation for the NCGP over the next 20 years, whether it adequately addresses the concerns raised during the initial consultations, and whether there are any unintended consequences or significant risks that have not been considered in the proposed model.

SAGE acknowledges and commends the Australian Research Council's (ARC) commitment to fostering a diverse and inclusive research environment in the following areas:

1. **Advancing Indigenous Research and Researchers:** The introduction of the "Realise Indigenous Capability" scheme, developed in consultation with the ARC Indigenous Forum, focuses on supporting Aboriginal and Torres Strait Islander researchers and research. This initiative addresses historical underrepresentation and enhances diversity within the research community.
2. **Improved Assessment Processes:** The ARC proposes enhancements to assessment processes to ensure transparency, fairness, and efficiency. These improvements aim to reduce biases and barriers that may hinder the participation and success of diverse researchers, including those from underrepresented groups.

We note, however, that the proposed model outlined in the Discussion Paper does not adequately address the concerns and recommendations expressed in SAGE's May 2024 submission in the initial consultation round. Furthermore, we are concerned that the lack of gender-specific interventions and support will result in unintended consequences or significant risks by increasing gender inequities. The proposed model offers some positive reforms but does not go far enough in embedding gender and diversity equity within funding mechanisms to provide a strong and equitable basis for the NCGP over the next 20 years.

By integrating SAGE's recommendations—especially linking funding to gender equity, diversity and inclusion (EDI) commitments, revising merit-based criteria, and enhancing data transparency—the NCGP can become a global leader in fostering a truly inclusive and equitable research environment in Australia. Doing so would ensure the ARC meets its stated goal to provide targeted support for underrepresented groups:

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*The ARC will identify cohorts which are currently underrepresented in the grants programs, and in such circumstances, examine how best to encourage more research proposals from them (NCGP Discussion Paper: 2025, p. 18).*

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

The ARC's proposed model lacks a professional development focus, whereby research outcomes are prioritised to the detriment of developmental researcher professional growth.

### 1. Support and Establish Meaningful Academic Career Pathways

The loss of stand-alone fellowships for Early Career Researchers (ECR) and Mid-Career Researchers (MCR) and the limit of Embedded fellowships to 2 years risks dramatically undermining the ARC's capacity for 'supporting academic career pathways' and fostering the Australian research landscape over the next 20 years.

#### *Action A: Address the proposed model's reduction in practical, meaningful opportunities for ECR & MCR*

- Include (retain existing) stand-alone 3-4 year postdoctoral and mid-career fellowships.
- Increase the Initiate scheme to an optional 2-3 years of funding to facilitate PhD opportunities, ECR and MCR career progression, and return on investment.

### 2. Support Proposed National Standards for Safe and Equitable Research

The ARC has the opportunity to establish structures to actively address the proposed national standards to prevent and respond to gender-based violence (GBV) in Australia in Higher Education. Embedded fellowships will impact ECR's ability to undertake independent fellowship projects. Embedded fellowships emphasis on team-based research will likely result in ECR being beholden to more senior researchers' agendas and biases. The model poses a risk to the proposed National Code for the Prevention and Response to GBV by perpetuating differential power imbalances. Women ECR and MCR, especially those in traditionally male-dominated disciplines, face additional risks when they are reliant on senior group leaders for their career development. In addition, the proposed model will reinforce sexism and unconscious biases through the Lead and Mentor scheme. This scheme sends a troubling message about the extent to which supporting the next generation should be a core principle across the research ecosystem. SAGE does not believe a separate scheme for research leadership and mentoring should exist. Instead, these activities should be embedded within every scheme.

#### *Action A: Embed Structures that Ensure Safe and Equitable Research*

- Facilitate independent fellowships for ECR and MCRs.
- Embed 'leadership and mentoring' as a core component of every scheme rather than administering a stand-alone Lead and Mentor scheme.

## Question 2: Does the proposed model adequately address concerns?

The ARC's proposed model makes strides toward supporting equity and diversity in research; however, it falls short in explicitly addressing gender equity and broader EDI considerations. SAGE's recommendations highlight areas where the ARC can better leverage funding mechanisms to drive equity, remove systemic barriers, and enhance data transparency.

### 3. Use Funding as a Mechanism to Improve Equity in Research

The ARC has a unique opportunity to use its funding power to reshape the research landscape toward greater equity. However, the proposed model does not sufficiently integrate mechanisms that ensure a proactive commitment to gender equity, diversity and inclusion (GEDI).

#### *Action A: Link Funding to a Commitment to GEDI*

- The ARC should require research institutions applying for funding to demonstrate a tangible commitment to GEDI through their institutional policies, leadership, recruitment, and career progression data.
- International examples, such as the European Union's Horizon Europe and Ireland's Athena Swan accreditation requirement, show that linking funding to institutional EDI commitments is an emerging best practice.
- Domestically, the Snow Medical Research Foundation and National Health and Medical Research Council (NHMRC) have set a precedent by requiring gender balance benchmarks and targets.
- The ARC should follow suit by mandating a Gender Equality Plan (GEP) that is evidence-based, publicly available, and integrated into institutional strategy.
- At the project level, funding should be prioritised for research teams that demonstrate diverse representation and incorporate an EDI lens in study design and impact assessment.
- Align the Kathleen Fitzpatrick and Georgina Sweet awards to the Collaborate or Breakthrough scheme to accurately reflect the value of women's research leadership and its power to achieve significant outcomes (including and beyond nurturing others).

#### *Action B: Establish Diversity Targets and/or Quotas*

- The proposed model lacks affirmative action in funding allocation necessary to accelerate gender and diversity parity.
- The NHMRC achieved gender equity in Investigator Grants within a year by implementing targets; the ARC should follow this approach.
- An intersectional approach is required, addressing gender alongside cultural and linguistic diversity, disability, sexuality, and First Nations identity.
- Specific funding streams should be dedicated to underrepresented groups, ensuring their representation in grant allocations reflects their presence in the research workforce.

### 4. Remove Barriers to Support a Strong and Diverse Research Sector

Although the ARC proposes a simplified grants process, it does not adequately address biases and structural barriers that impede equitable participation.

#### *Action A: Revise Merit-Related Assessment Criteria*

- The current merit-based system disproportionately disadvantages women and other underrepresented researchers.
- A Canadian Institutes of Health Research study found that women were less likely to receive grants when assessments focused on the principal investigator rather than the research itself.
- The ARC should shift evaluation criteria to prioritise research quality over applicant track record to mitigate systemic biases.
- Introducing explicit EDI criteria—such as rewarding contributions to mentoring, teaching, and service—can reduce the 'minority tax' on underrepresented researchers who are often overburdened with institutional EDI work.

#### *Action B: Address Biases in Peer Review Processes*

- Peer review panels must be more diverse, reflecting Australia's research demographics.
- All peer review panel members must undertake EDI and unconscious bias training.
- Canada's Research Chairs Program has committed to ensuring peer reviewers represent the national population's diversity. Australia should implement a similar approach.
- De-identified assessment will make unconscious bias significantly more challenging to acknowledge and account for and will likely have a disproportionate impact on women researchers. The Australian research community is too small to support a de-identified two-stage assessment process safely. Anonymisation can inadvertently hinder affirmative action efforts, as seen in the Australian Public Service and limit a researcher's ability to communicate relative to opportunity and career disruptions.

### Question 3: Unintended Consequences and Significant Risks

If the ARC does not implement gender-specific and intersectional equity measures, several unintended consequences are likely to arise:

#### 1. Risk of Perpetuating Gender Inequities

- While maintaining the Kathleen Fitzpatrick and Georgina Sweet awards, the proposed model does not introduce new structural mechanisms to advance gender equity.
- The lack of specific interventions may result in the continued underrepresentation of women in senior research leadership roles.
- Failure to integrate gendered analysis into funding criteria will sustain systemic disadvantages for women researchers.

#### 2. Missed Opportunity to Leverage Funding for Systemic Change

- Without requiring institutions to commit to gender EDI, progress toward equity will be slow and inconsistent.
- The absence of targets and quotas means that underrepresented groups will continue to face hurdles in accessing research funding.
- Affirmative action policies, such as NHMRC's gender-balanced funding allocation, should be replicated in the NCGP model.

#### 3. Data and Transparency Gaps

- The current proposal lacks robust mechanisms for tracking and reporting EDI outcomes.
- Improved data collection, reporting, and monitoring of diversity in grant applications and success rates is essential to identify disparities and inform policy.
- The ARC should annually publish intersectional diversity metrics on funding distribution, disaggregated by (at least) gender, career stage, cultural background, and disability status.

### Summary of Key Recommendations to Strengthen the proposed NCGP Model

1. Support and Establish Meaningful Academic Career Pathways
2. Enable Proposed National Standards to ensure Safe and Equitable Research
3. Strengthen the Use of Funding to Drive Gender EDI
4. Actively reduce Systemic Barriers in the Research Sector
5. Improve Intersectional Data Collection and Transparency

\* References for recommended actions: [SAGE References](#).

\* Further details, examples and evidence supporting SAGE recommendations: [17 May 2024 Submission](#).