

Submission from the Australasian Research Management Society (ARMS) Consultation on the Draft 2026 NHMRC Funding Agreement

ARMS appreciates the opportunity to contribute consolidated feedback on the draft 2026 Funding Agreement through our Directors of Research Special Interest Group. As the peak professional body representing more than 5,000 Research Management Professionals across Australia, New Zealand and Singapore, ARMS provides a sector-wide perspective grounded in operational experience, regulatory compliance, and engagement with national policy frameworks. While individual institutions will make their own submissions providing further detail, our submission summarises key themes raised consistently across our membership. ARMS also notes its ongoing participation in sector working groups relevant to these matters, such as the Universities Australia Partnering for Research Integrity Reform Working Group.

Key Themes from Sector Feedback

1. Research Integrity Provisions: Role, Remit and National Alignment

Members expressed concern regarding the draft clauses related to NHMRC review of institutional research integrity processes. Common sector positions included:

- The need for clearer alignment with the national integrity framework and existing external review mechanisms.
- Uncertainty about the NHMRC's intended role and the scope of its authority within integrity reviews.
- The risk of duplicating functions already undertaken by nationally recognised bodies.
- A need for detail on triggers, procedures, boundaries, and expected outcomes of any NHMRC-led review process.

Sector feedback emphasised that the responsibility for managing institutional integrity processes must remain clearly defined and that any NHMRC involvement should be transparent, consistent with procedural fairness, and limited to established intervention points.

2. Disclosure of Alleged or Suspected Misconduct

The broad provisions allowing disclosure of alleged, suspected or untested integrity matters were a consistent area of concern. Members highlighted that:

- Disclosure prior to substantiated findings could cause serious reputational and procedural harm.
- Any disclosure obligations must be carefully limited, confidential, and grounded in principles of privacy and natural justice.
- Only confirmed or upheld findings should be subject to external reporting.

We strongly support re-examining this clause to ensure clarity, proportionality and alignment with national integrity guidance.

3. Training Requirements and Child-Related Risk Assessment

Members raised concerns related to:

- The proposed training requirements and whether they are clear, achievable, or duplicative of existing frameworks.
- Provisions relating to risk assessments involving children, noting significant variability across state legislation.
- The importance of ensuring any national requirement is workable, evidence-based and reflective of practical institutional environments.

There was broad support for modifying these clauses to better reflect the diversity of state legislative contexts.

4. Timeframes for Reporting Integrity Matters

The sector agreed that proposed reporting timelines, particularly around integrity and fraud matters, are unrealistic. Members noted:

- Integrity matters require preliminary assessment, triage and expert review prior to external notification.
- Rigid five-day deadlines are unworkable and may compromise quality, accuracy and procedural fairness.
- More reasonable, flexible timeframes would better support both compliance and due diligence.

5. Intellectual Property and Licensing Requirements

Members expressed ongoing concern about the operational impact of IP clauses, particularly:

- The expanded license to Incorporated Material - any existing material incorporated within Application and formal reports, which could include third-party content, may be problematic for commercial arrangements and may act as a disincentive to innovation and investment

The sector recommends a review of these provisions to ensure they are proportionate, practical and supportive of collaborative research.

6. Commonwealth Purposes, Definitions and Consistency

Feedback noted several definitions that require further clarification or refinement, including:

- The breadth of the updated “Commonwealth Purposes” definition and its potential to enable wide sharing of personal integrity-related information.
- The need for greater internal consistency across terminology, including references to committees and advisory groups.
- Ensuring definitions align with legal, privacy and confidentiality obligations.

Members emphasised that clearer definitions would help reduce ambiguity and compliance risk.

7. Foreign Interference Requirements – Clause 27

Members requested clarification on how the foreign interference provisions apply to different types of institutions, including medical research institutes. Questions centred on:

- The practical implications of the clause.
- The scope of disclosure required.
- How the clause aligns with existing national security and foreign interference frameworks.

Further guidance would ensure institutions understand their obligations and can comply effectively.

8. Interest Income and Financial Governance

Sector feedback reiterated long-standing concerns about interest income clauses across Commonwealth research funding agreements. Members noted that:

- These provisions create inconsistencies with accounting standards and institutional financial reporting.
- Managing interest at the project level introduces administrative and governance challenges.
- A coordinated, cross-agency review would help ensure a consistent and workable approach.

Conclusion

ARMS remains committed to working collaboratively with the NHMRC to develop a Funding Agreement that is clear, practical and aligned with national policy settings. We believe that refinements to the provisions outlined above will help ensure the agreement remains workable for institutions while supporting high-quality research and strong national governance frameworks.

We welcome continued dialogue and invite the NHMRC to engage with ARMS via our Directors of Research Special Interest Group as the consultation progresses.

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