

Private Submission: Strategic Review of Health and Medical Research

Please accept my submission addressing knowledge governance issues contained in the *Terms of Reference* questions:

- *Why is it in Australia's interest to have a viable, internally competitive health and medical research sector? (Reference 1 and 6); and,*
- *How might health and medical research be best managed and funded in Australia? (Reference 2, 3 and 7).*

It is beyond debate that innovative, ethical Australian research and continuing education should be supported to contribute to improved health and well-being globally.

This contribution is, however, impeded by fragmented tertiary governance requirements and unenforceable '*Guidelines*' and '*Codes*' outside the National Health and Medical Research Council (NHMRC) funded research in Australia, resulting in varying quality, failure to comply with aspirational statements and no mechanism to achieve compliance with consistent national research standards, thereby detracting from the standard of research.

In particular, while each Australian University is expected to comply with the NHMRC research '*Guidelines*' and '*Codes*' and establishes individual Human Research Ethics Committees (HREC), breaches of research guidelines are dealt with by the individual Universities internally with no enforceable compliance with national standards.

To illustrate the systemic difficulties in enforcing consistent research standards, I have attached a copy of a complaint made against the Wollongong University Human Research HE 02/274 to the NMHRC, that could not be investigated by the Council because the research had been funded by the Australian Taxation Office (ATO). [**Note - not attached due to confidentiality**]

I therefore submit that the Review recommends the establishment of a single national Australian University health and medical research governing body that:

1. Replaces the '*Guidelines*' and '*Codes*' with consistent, quantifiable, enforceable national standards of research conduct;
2. Mandates compliance for all research approved by individual University HRECs with national standards of research conduct and non-compliance be subject to investigation by the single national governing body;
3. Establishes a national database of Australian University's registered Human Research applications, approvals, completions and investigative reports that are regularly audited to facilitate the most effective use of Australian Human Research nationally and internationally;
4. Requires full research funding disclosure so that a complete financial picture of Human Research in Australia can be quantified;

5. Utilises current and future technology to support and facilitate the translation of all Human Research into information and evidence underpinning ethical, empirical, transparent policy and legislation nationally.

Thank you for the opportunity to attend the public consultation in Canberra on 19 April 2012 and accepting this submission.

Nancy-Louise McCullough
(02) 6295 1428
blackjack2002@bigpond.com