Submission to the Australian Research Council consultation on Funding rule changes

The Australian Academy of Science welcomes the opportunity to provide comments on the proposed changes to the Funding rules. The Academy would like to offer the following specific comments in response to the proposed changes.

(1) Discovery Program schemes
(Covering Discovery Projects, Discovery Indigenous, Australian Laureate Fellowships, Discovery Early Career Researcher Award and Future Fellowships)

**ARC Proposal**

a. Eligibility

After the merit selection process itself, eligibility is the most difficult and time consuming component of the grant rounds. Additionally the ARC is being presented with increasingly complex employment relationships. We are aware that these issues cause serious concerns within the sector.

The current rules around Chief Investigator eligibility have a number of different components (see for example, section C6.2 of the Funding Rules for the Discovery Program). We are proposing that the rule be reduced to:

i. a CI must be employed at a minimum of 0.2 FTE at an Eligible Organisation; or

ii. hold an Emeritus appointment at an Eligible Organisation

The 0.2 FTE limit is the broadest condition within the existing rule-set and we believe that this has been working well in areas where it has been applied. It is also our view that implementation of this rule will avoid the need to modify the Eligible Organisation list.

We have removed eligibility for Adjuncts, but it should be noted that these people may still be included as Partner Investigators.

**Academy response**

In attempting to harmonise eligibility requirements the Academy supports the decision to take the broadest condition and apply this across the different disciplines. This is a fair and measured approach that should be sufficiently flexible to meet the most varied, and sometimes complex, working relationships of researchers with their institutions.

**ARC Proposal**

b. Cross scheme limits

The streamlining process undertaken last year highlighted a number of inconsistencies in the schemes under the Discovery Program, one of which was cross-scheme eligibility. The ARC has an
expectation of level of CI participation in grants that results in a limit of two concurrent grants within the Discovery Program. To date this has not applied to CIs who are members of Centres of Excellence or other similar initiatives, notwithstanding a similar expectation of commitment for these awards. It is proposed that:

CIs on ARC Centre of Excellence, Industrial Transformation Research Hub, Industrial Transformation Training Centre, or Special Research Initiative may only apply for or hold one additional Project/Award/Fellowship, under the Discovery Program.

Note that in these cases the rule may be applied post-award. That is, a CI may apply for a Centre of Excellence whilst holding two DP grants, but one must be relinquished should the Centre bid be successful. A current member of a Centre of Excellence will not be able [to] apply for a second DP grant if they already hold one.

We are also intending to reinstate post-award relinquishment to applicants for Laureate Fellowships, allowing researchers who hold two Discovery Projects to apply for a Laureate Fellowship and relinquish one DP should they be successful.

Academy response

The proposed change to cross scheme limits to bring ARC Centres of Excellence and other similar initiatives in line with the Discovery Program appears to be a sensible move, and will make understanding eligibility requirements more straightforward for researchers.

The ARC states that the rule ‘may be applied post-award’. This text is confusing as it could be read to mean that it will be at the ARC’s discretion as to whether or not this rule will be applied, or alternatively that the CI may choose to relinquish a grant should that be necessary. The ambiguity should be removed.

The Academy strongly supports the ARCs intention to reinstate post-award relinquishment to applicants for Laureate Fellowships who hold two Discovery Projects so that they can take up a Laureate Fellowship, and relinquish one DP should they be successful. Given the status of these Fellowships and the level at which they are targeted, is essential that the program is open to the very best applicants, and that eligibility requirements do not unnecessarily hinder Australia’s very best researchers from applying and being assessed on their merits.

(2) Future Fellowships scheme

ARC Proposal

a. Scheme Objectives

The ARC proposes that an objective of the Future Fellowships scheme be clarified as follows:

“To ensure that outstanding mid-career researchers are recruited and retained, by Eligible Organisations in continuing academic positions.”

To this end, the ARC would require Eligible Organisations to commit to retaining successful Future Fellows in continuing positions, subject to appropriate performance during the fellowship.
Academy response

The Academy does not support this proposed change and seeks clarification on what level of commitment the Eligible Organisations are being asked to make in this regard. There are two interrelated points that the ARC should keep in mind if this proposed change is being considered.

1. Changing funding environment for Eligible Organisations

The funding environment for Eligible Organisations is very volatile.

a. The changes proposed by the ARC are asking for future financial commitments in an environment where circumstances may change significantly in the intervening period. Whilst the Academy strongly welcomes the creation of continuing academic positions, care must be taken that this is not to the detriment of other researchers or the Eligible Organisation in question.

b. The imposition of a requirement for a guaranteed ongoing position could well serve as a significant disincentive for institutions to support some strong applicants for Future Fellowships.

c. We suggest a wording along the lines - “institutions should provide the opportunity for continuing appointment at the end of the Fellowship”.

2. Inadvertently setting the strategic direction for Eligible Organisations

a. Either directly or inadvertently, the ARC is partly setting the staffing direction for Eligible Organisations. The proposed change has the potential to reduce each Eligible Organisation’s ability to set its own strategic direction.

b. Over time a significant number of continuing appointments in Eligible Organisations will be set by the outcomes of ARC Future Fellowship rounds, rather by the strategic interest that Eligible Organisations wish to pursue.

c. Particularly for the larger organisations, where there are a significant number of Future Fellowship applicants, the success in Fellowships (particularly by discipline) cannot be predicted and the success is not often uniformly distributed across an institution.

ARC Proposal

b. Eligibility

The Future Fellowships scheme is specifically targeted at mid-career researchers. Again we are seeking to simplify eligibility requirements. It is proposed to retain the lower bound on the eligibility, namely 5 years since PhD, but remove the upper bound (currently 15 years). Instead it is proposed that:

*Only researchers employed on a non-continuing basis, or those who have held continuing positions at Eligible Organisations for a total of less than three years will be eligible to apply for a Future Fellowship.*

There is a view that applicants who already hold continuing positions and have done so for a number of years are beyond the scope of “mid-career” researchers and awarding fellowships to such applicants does not sufficiently address the scheme objective as articulated above. In the last round
of Future Fellows nearly 50% held continuing appointments. Fewer than 14% would have been excluded under this rule.

Note that our ROPE principles would apply in this case. For example, if an applicant had held a continuing position for four years, but two of those years were on maternity leave the would still be eligible to apply for a fellowship.

Academy response

The Academy has strong reservations about the proposed changes to eligibility for the Future Fellowship Scheme.

This change will potentially have unintended consequences that should be carefully thought through. Given the short amount of time available before the funding rules need to be released the Academy recommends the ARC undertake a longer consultation on this particular change with a view to implementing any changes next year.

The aim of the Future Fellowship scheme is to provide “research only” opportunities to Australia’s best and brightest mid-career researchers.

The ARC has recommended that eligibility be restricted to researchers who do not have a continuing position or who have held a continuing position for less than three years. There are many early- and mid-career researchers who have held continuing positions for more than three years who would benefit from a research-only fellowship. Apart from the elite Laureate Fellowships, there are now no other research-only fellowships available through the ARC.

Part of the original purpose of the ARC Future Fellowship scheme was to help retain Australia’s most talented and gifted researchers. The Fellowship provides the holders with an unrivalled opportunity to focus on research.

The proposed changes indicate that those who hold continuing positions at Eligible Organisations (that is universities and research institutes in Australia) will be ineligible to apply for Future Fellowships, but the rule does not apply to researchers employed in continuing positions at overseas institutions or outside the university/medical research institute sector.

Whilst the Academy notes that recent statements from the ARC suggest that the scheme will now be restricted to Australians, presumably Australians living overseas are still eligible to apply. This proposed change does discriminate against those who have already made a substantial commitment to the research system through their career in Australia.

The use of three years employment on a continuous basis as a measure to exclude researchers is a relatively blunt instrument. There are many types of continuing employment that exist within an eligible organisation: research only, research and teaching, and teaching only. There needs to be clarity in the definition of ‘continuing positions’ and how this applies to those employed on contracts at less than 1.0 FTE.

ARC Proposal

c. Salary Levels
The current partition of the Future Fellowships into three levels has caused confusion for the applicants. We are attempting to address this by tying the level awarded to the academic level of the applicant at the time of application. Specifically:

*Successful applicants would be awarded a Future Fellowship at the academic level one step higher than their academic level at the time of submission*

Applicants who are already awarded at Level E would be awarded a fellowship at Level E.

**Academy response**

ARC fixed salary levels are already significantly below that of most universities at the same level of appointment. The ARC should review their salary levels to bring them in line with the university median average salary levels.