

## Australian Research Council's consultation on changes to funding rules

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### Submission by the Early- and Mid-Career Researcher Forum (EMCR Forum) of the Australian Academy of Science

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#### 1. Discovery Program schemes:

##### a. Eligibility

###### **Proposed Changes**

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.

###### **The EMCR Forum's Response**

We agree that the Chief Investigator (CI) eligibility requires simplification and clarity, and the proposed changes appear equitable. In the same vein, it would also be fair for this aspect to be reinforced in the Research Opportunity and Performance Evidence (ROPE) criteria where such a CI's either limited or potentially diverse opportunities are considered in the ranking.

## **b. Cross-scheme limits**

### **Proposed Changes**

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.

### **The EMCR Forum's Response**

The proposed change to ensure CI limits of two current grants within the entire Discovery Program schemes is very reasonable. This will create consistency. However, a number of proposed programs are within the Linkage Program schemes, which means that carefully and clearly stated limits would be required. Moreover, maintaining these consistently for a long period of time would be suitable.

#### **CI Limit**

One of the key statements appears inaccurate:

*"To date this [the CI limit] 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."*

CIs on ARC Centres of Excellence (CoEs) were allowed to be named as CIs on only one Discovery Project (DP) during the period 2006-2014. Please refer to ARC DP Funding Rules: 2006 – 3.6(a,iv), 2007 – 3.6.1.2(d), 2008 – 3.6.1.2(d), 2009 – 6.6.1.2(d), 2010 – 6.6.2(d), 2011 – 6.6.2(d) which explicitly refers to relinquishing a DP, 2012 – 9.1.1, 2013 – 9.1.1, and 2014 – 9.1.1.

The change to the 2015 Discovery Program scheme rules, which excluded the CoEs from the list (as they reside within the Linkage Program), has resulted in this ambiguity.

#### **Relinquishment of DPs**

Relinquishing a DP post-award to maintain the CI limit of two current grants is a valid consideration. It should only be favoured for selected elite programs such as the Australian Laureate Fellowships and the CoEs.

The ability to relinquish a DP in the event of a successful grant needs to be clarified and retained for a sustained period. In this regard, it would be good to clarify whether relinquishment of a DP applies only to Centres of Excellence and Laureate Fellowships or to the Industrial Transformation Research Program (ITRP) scheme as well.

Beyond this, researchers should be encouraged to plan the timing of their application(s) strategically, rather than enabling a scatter-gun approach (this would also favour the assessment process with slightly fewer proposals).

The ARC position on potential unintended consequences of relinquishing DPs post-award needs to be clarified. In the event of a DP with other CIs (including early-career researchers), is the relinquishment related to the entire project, or only to the CI role related to the project for the CI who has exceeded the limit? There are three potential flow-on effects:

1. If projects are allowed to continue with the CI position relinquished, will the ability of the remaining CIs to be re-evaluated solely by the Executive Director (ED) of the relevant discipline decide whether it can continue? If project continuation by default is allowed, it could be unfairly used as a mechanism to use a CI's track record to win a DP.
2. If the entire project is to be relinquished, it can potentially affect the other CIs. It affects their time, effort, and related significance of the DPs. It could also result in a lost opportunity for those CIs where they could have applied for another DP. Under this scenario, the relinquishment would require all CIs to agree to it.
3. If the entire project is relinquished, which will always be the case for sole-CI DPs, what happens to any postdoctoral researchers employed on this project? Is their employment terminated or is the onus on the Administering Organisation to resolve this? This might create a culture of offering very short-term contracts to the researchers employed (in order to prevent complications), which would severely disadvantage EMCRs.

For these and other reasons, encouraging relinquishing DPs routinely should not be favoured.

## 2. Future Fellowships schemes:

### a. Scheme objectives

#### **Proposed Changes**

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.

#### **The EMCR Forum's Response**

In principle, we strongly support the intent of this proposal. It would reward researchers being picked by their peers as among the best and brightest, and to be retained. However, its implementation could be *via* Selection Criteria, rather than Funding Rules.

It should be noted that the assessment process for the FT is influenced by the Eligible Organisation's commitment to the Fellow. Assessors should be encouraged to consider this aspect, which they are through Selection Criteria c(iv):

*'Is it likely that the Future Fellowship Candidate will transition to a continuing position within the Administering Organisation at the end of the Future Fellowship?'*

This could be the potential area of focus in attaining the goal of this proposed change.

Making this a requirement through the Funding Rules will tend to pose two complications:

1. **Interference with the autonomy of Eligible Organisation's research and recruitment strategy.** Requiring Eligible Organisations to offer continuing appointments to every FT candidate can skew their academic/staffing profile (while impacting research output), and affect the staff numbers available for teaching in universities. On the flipside, it will encourage focused growth in areas of research strengths (aligned with the goals of the ERA assessment), but this can be addressed via effective Selection Criteria.
2. **Assessment of performance or non-performance.** A guarantee from an Eligible Organisations of a continuing position to a Future Fellow at the end of their Fellowship would need to be linked to satisfactory research performance of the Fellow. This would imply the need for standards by which discipline-specific non-performance would be identified, and transparency in the implementation of such processes.

## **b. Eligibility**

### **Proposed Changes**

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 they would still be eligible to apply for a fellowship.

### **The EMCR Forum's Response**

The EMCR Forum **strongly objects** to the change as proposed.

The standard definition of a mid-career researcher is one who is within 15 years of being awarded their PhD (accounting for interruptions). The ARC proposal assumes that a person who is in a continuing position for more than 3 years, irrespective of stage beyond being awarded their PhD, is not mid-career and is an established researcher.

This proposal has numerous pitfalls, unintended consequences and anomalies as listed below. We would **strongly recommend**: (i) reconsidering this proposal and (ii) undertaking further consultation (with a longer response period) before what can only be viewed as a drastic change. Our reservations stem from the following:

1. **Fails to recognise and reward excellence.** The fundamental principle of all ARC Fellowships has been to reward research excellence and achievements. Filtering the

scheme to a selected group of applicants will go against this principle, and potentially reduce the value and recognition of Future Fellowships.

2. **Fails to recognise the impact of securing a Fellowship on a researcher and research outcome.** A fundamental question to be considered is: 'Why do Fellowships matter to researchers?' Beyond the opportunity of securing a salary to continue pursuing a research career for non-continuing staff, a Fellowship is recognition of research achievements. It allows excellent researchers to focus full-time on research and attain high impact outcomes. The value of Fellowships in this context to continuing staff (normal definition: 1.0 FTE academic, with 40:40:20 split of research:teaching:admin) is that it allows them to reduce their teaching load to do more research. As Fellowships reward research excellence, it can be expected that this will enable continuing staff to achieve significant research outcomes, otherwise not possible within that time-frame.
3. **Will fail to *retain* the best researchers.** If existing researchers cannot apply for Fellowships in their mid-career despite demonstrating research excellence with limited opportunities, it will result in them looking for opportunities overseas (despite being in continuing positions). This will mean a loss of excellent researchers at the prime of their career – a career in which their Organisations, potentially the ARC, and taxpayers have invested. The inability to retain excellent researchers in Australia goes against the objectives of the Future Fellowship scheme.
4. **Could entrench a culture of differentiating fixed-term and continuing staff.** Australia is fortunate to have a culture that does not significantly differentiate between fixed-term and continuing staff. This applies to salary levels and employment benefits. Introducing schemes and Fellowships which seed such differentiation will encourage discrimination.
5. **Penalises successful researchers and strategic Organisations.** Excellent researchers could have worked hard and convinced Organisations to offer them continuing positions for stability (often at the expense of taking on significant teaching loads). Likewise, Organisations might have had foresight and strategic planning to select and reward emerging research leaders (the original target applicant pool of the Future Fellowship scheme). This proposal penalises both parties and undermines ability to pursue strategic decisions. It also potentially penalises 'younger' universities which undertake bold recruitment strategies and favours only 'older' universities which generally appoint staff in continuing positions 9 to 12 years post-PhD.
6. **Creates further insecurity for EMCRs.** Being an early- or mid-career researcher poses plenty of challenges, especially in attaining a secure and stable career to focus on excellent research outcomes. The proposed change will potentially create more insecurity as it will force an unsavoury strategy on Organisations. It would not be far-fetched to state that Organisations will tell researchers at the cusp of attaining continuing positions to hold off as it would enable them to apply for Future Fellowships and benefit their career. This could mean EMCRs being held in contract positions for longer, and greater insecurity as a changing environment could mean that the offer of a continuing position never eventuates.
7. **Creates anomalies in the scope of Fellowships.** The proposed change creates anomalous situations and questions whether Fellowships are purely not to enable and sustain excellence. The change appears to state continuing staff are not mid-career, albeit potentially with the meaning that they are established. Based on such a principle, one could say that no established researchers require Fellowships (such as the Australian Laureate Fellowships), but these rightly exist to reward excellent researchers and enable them to undertake even more significant research. The proposed change would also create a further anomaly where an individual who secured a continuing position early in their career is eligible to apply for a DECRA but is ineligible to apply for Future Fellowships.
8. **Could set an undesirable upper bound.** The proposed removal of the upper bound of 15 years is potentially suitable if the upper bound is set by academic level instead. A potential recommendation is that this upper bound could be Level D on the academic scale. Applicants already at Level E could be considered ineligible to apply for the Future Fellowships, as being promoted to a Professor is recognition of being past 'mid-career' and



of being well-established. Applicants at Level E also potentially have the opportunity to apply to the Australian Laureate Fellowships scheme.

As stated above, one can see the proposed changes will have a number of unexpected and undesirable impacts for EMCRs. It will potentially undermine the only scheme available (given the ARC DORA scheme's discontinuation) for excellent mid-career researchers to focus purely on research to attain game-changing outcomes for scientific research and Australia. All stakeholders encouraged the government to retain the scheme for the benefit of all mid-career researchers, and not just a selected few, to encourage people to stay in research in Australia.

### c. Salary levels

#### **Proposed Changes**

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.

#### **The EMCR Forum's Response**

The streamlining of salaries awarded with Future Fellowships would be useful. The change proposed appears to relate to 'levels', meaning a Level C academic would be awarded a FT at Level D, and likewise, a Level D academic a Level E salary.

This proposal has one positive outcome, and two challenges:

##### *Positive outcome*

**Enables Fellows to focus on research.** One could assume a researcher who secures a Future Fellowship has sufficient research outcomes and excellence to be easily promoted from Level C to Level D. The proposed change would save the Fellow a significant amount of time in preparing promotion application materials, which would allow more productive research activities.

##### *Challenges*

**Interferes with Eligible Organisation autonomy.** This proposal will circumvent the Eligible Organisation's promotion processes. Except for the time-saving positive, there are many drawbacks. It interferes with the autonomy, internal processes, and standards of the Organisation. The Future Fellowship does not assess the full spectrum of capabilities required for a promotion (detailed in the next point).

**Selection criteria too research-focused to establish leadership capabilities.** The Future Fellowship selection criteria aim to assess broader contributions rather than just research excellence through Selection Criteria a(iv), a(v), and b(vii). However, this is very limited in the context of leadership and it is also questionable whether Assessors are seriously evaluating leadership capabilities and broader contributions to research policy alongside research outputs. Unless these aspects are effectively considered, the award of a Future Fellowship cannot be reasonably expected to allow a step up in academic levels.

If the proposed change relates to salary award at the next academic classification step (C2 awarded C3-C6, for example), it would be perfectly reasonable.