

THE PSYCHOLOGY FOUNDATION OF AUSTRALIA

(Incorporated in New South Wales)

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8 November 2014

Dear Professor Byrne,

The Psychology Foundation of Australia wishes to provide some feedback regarding the new Australian Research Council (ARC) Medical Research Policy. Psychology, as a hub discipline, has a central role in investigating the basis processes underlying behaviour. These investigations are well covered in the guidelines and clearly remain acceptable for consideration by the ARC. However, the hub discipline role also means that researchers in psychology frequently interact with other disciplines and also i [fZ more professionally-oriented applied psychologists. In many cases those projects do cross the boundary into topics more appropriately considered by the NHMRC, but often projects investigating basic processes of cognitive function produce results likely to have application in wider settings. Indeed it is desirable that they do so. In writing grants it is a common practise to elaborate those broader implications and frequently they will be in aspects of health or clinical settings.

We believe that some minor changes to the criteria would help ensure that the proposed guidelines continue to exclude work which should fall within the ambit of the NHMRC but retain work on basic processes that we believe should remain within the ARC.

Our specific suggestion is that under the heading of 1. Research eligible for ARC support, item b) is reworded as follows (our insertions in italics):

'Research in the natural *or social* sciences, where the goal is the fundamental understanding of biological *or psychological* processes or the development of knowledge and/or technology platforms, that may ultimately have medical application'

This broader definition would include many of the projects that are potentially at risk of falling into a funding eligibility gap; a problem the new guidelines indicate they wish to avoid.

For example, studies of the basic processes underpinning reading inform theories of cognition, perception and memory and often have direct application to the treatment of dyslexia. It would be undesirable for applicants to avoid mentioning this potential application even if it not the central focus of the research. It is also quite common for such studies to use groups of dyslexics and or individuals with brain impairment to facilitate the understanding of these basic processes. Similarly, a psychopharmacology



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grant this year which focused on pharmacological influences on basic memory processes, specifically fear memory, was queried because the applicants drew attention to potential role for these processes in Post-Traumatic Stress Disorder. Such applications have always been within the ambit of the ARC and because they do not have direct health or translational focus are not suitable for the NHMRC.

Our concern is about where the ARC draws the line between projects that are primarily designed to understand basic processes but which have health and medical implications and those more substantially focused on those implications. Across the country we are aware of grants that could fall either side of the line, even though all have been similar to ARC funded projects of the past (We could provide some examples of previously funded projects and some current applications in our forthcoming meeting that we feel should remain eligible in the ARC). In fact, grants on such basic processes are rarely positively considered by the NHMRC who have a much more clinical focus. This too should be addressed but we wish to ensure that a funding eligibility-gap is not created which would defund these areas of Australian research strength.

This concern hinges on how components of basic and applied science are weighted in arriving at the decision. Since such judgement calls will often be difficult we are interested to know what process will be adopted to decide whether projects are eligible or not. Is this going to be a decision made by the Colleges of Experts or a different group? The former would seem to be the most suitable since expert knowledge is likely to be required.

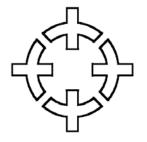
We also seek clarification on the tension between current points

1. b) research in the natural sciences, where the goal is the fundamental understanding of biological processes or the development of knowledge and/or technology platforms, that may ultimately have medical applications; ...

and

2. c) interventional research in humans, particularly clinical or pre-clinical trials of therapeutic goods (including devices), or research aiming to modify the health of the human participants; or,

Our interpretation is that research examining basic biological and psychological processes such as the interaction between stress and decision making or planning would be eligible because it addresses a topic which is not targeted at a health or medical



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intervention. In such cases it is often advantageous to take physiological measures, including blood draws and saliva samples, for later analysis to assess levels of stress.

We are aware of individuals being advised by an institutional research office that such a project would be ineligible for ARC support because biological samples were being taken. However, this advice seems contrary to the overall intent of the guidelines. We request that the guidelines be reworded to clarify this issue, for example by including a statement indicating that:

Decisions regarding eligibility for ARC support hinge on the topic of the research, not the type of measures employed in obtaining pertinent information for answering questions relating to that topic.

We thank you for your consideration and look forward to discussing these implications of the new guidelines.

Yours sincerely

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David Badcock