



Response

A Universities UK response on behalf of Membership
to a consultation by another organisation

Universities UK's response to the DfES consultation on the reform of higher education research assessment and funding

Universities UK is pleased to respond to the Department for Education and Skills consultation document *Reform of higher education research assessment and funding*. Key points in this consultation response include:

- UUK fully supports the need for a fundamental reform of the RAE process.
- Universities UK strongly supports the dual support system, and welcomes the government's commitment that this principle should continue within a reformed system.
- UUK have real concerns about all of the models outlined in the consultation. Metrics will have a key role to play in any future system, but we are worried about an approach that is based solely on research income, and which excludes peer involvement entirely.
- Any new system should continue to be UK wide and provide universal coverage across discipline areas.
- It will be important that we do not rush this and fact that RAE2008 will now proceed as planned provides ample time within which to develop a robust alternative.
- The transition to a new system should be managed and moderated to avoid any destabilising effects.

For further information please contact Chris Hale
chris.hale@universitiesuk.ac.uk
02074195490





Universities UK's response to the DfES consultation on the reform of higher education research assessment and funding

1. Universities UK is pleased to respond to the Department for Education and Skills consultation document *Reform of higher education research assessment and funding*. This submission follows extensive consultation with Universities UK members and has been informed by advice from a small working group of Pro-Vice Chancellors Research from across the sector¹.

Key principles

2. UUK fully supports the need for a fundamental reform of the RAE process. We do, however, feel that there is a need to broaden the scope of the debate. We have therefore developed a set of 'key principles' on research assessment and funding, which we strongly believe should shape and direct further policy discussion and developments in this area. These principles were sent to the Secretary of State for Education, Alan Johnson, on 26 September, and have informed this fuller, more detailed response. The key principles are included as Annex B to this document.

Introduction

3. It is worth putting this response in context by emphasising that the UK remains the second most important research power in the world. The UK produces nine per cent of the world's scientific papers with a citation share of 12 per cent, second only to the USA, and has continued to strengthen its share of the world's most influential papers, from 12.9 per cent to 13.2 per cent. The continued strength of UK research is present across the full range of scientific disciplines from engineering and physical sciences through to the arts and humanities. The UK's universities, from across the whole sector, have underpinned this success, which has been achieved with relatively lower investment than competitors. UK research is not only strong internationally, but also relevant to research users at regional and national levels. Any new mechanism should seek to sustain and build upon this outstanding success.
4. The success of the UK's university research has been underpinned by the dual support system, which provides public funds to institutions in two streams, one as part of their block grant provided by the Funding Councils, and the other in the form of project based grants, provided by Research Councils. A key strength of the dual support system is that the Funding Council grant is unhypothecated allowing university leaders the freedom to take strategic decisions about the research activities of their own institutions. It also means that there are multiple sources of funding for research, with multiple decision points about what research should be supported and where

¹ This group was set up under the then UUK Research Policy Strategy Group and chaired by Professor Stuart Palmer, Deputy VC University of Warwick, a full membership list can be found at Annex A.

research resources should be concentrated. This creates a healthy and dynamic research base in the UK. Universities UK strongly supports the dual support system, and welcomes the government's commitment that this principle should continue within a reformed system.

5. Universities UK very much welcomes the substantial additional funding provided in the last two spending reviews to support university research, specifically the additional funds to ensure that we can work towards redressing the historic imbalance in the dual support system, making the university research base more sustainable in the long term. However, the pressures on dual support are still significant, as HEIs work to ensure that the research base is sustainable across all activities. Therefore, in parallel with discussion around the reform of the system for assessing and allocating research funding, a key priority for the next and future spending rounds will be to continue to work towards redressing the historic under-funding in the dual support system, particularly on the QR side.

The current system- cost, benefits and rationale for reform

6. QR funds are allocated on the basis of quality through the periodic RAE. The RAE is an *ex post* system, based on informed peer review. A study comparing systems for university research evaluation and funding internationally, conducted in 2003 by the Science Policy Research Unit (SPRU) at the University of Sussex², shows that the UK has developed one of the most advanced research evaluation systems in Europe, and is one of only a few countries that have implemented a performance based system to allocate research funding, although the trend is in this direction. There are clear advantages to this approach, which are highlighted in the study, and have been evidenced through the RAE.
 - It has allowed selective funding of research, based on excellence.
 - It has created a strong incentive to improve individual as well as institutional performance.
 - It has helped institutional management and strategic planning processes and increased efficiency.
 - It has provided greater accountability for public funds invested in research (as opposed to system based, for example, on numbers of students and institutional size).
7. However, in recent years there has been a growing dissatisfaction with the RAE system, and increased calls for reform. UUK feels that it is important to first explore some of the issues that have driven this reform agenda. The two key drivers for reform, as have been expressed in the government's *Next Steps* document, have been the burden imposed on the sector by the RAE process, and the deleterious distortions the current RAE process has created.

² Geuna A & Martin B R *University research evaluation and funding: an international comparison*, *Minerva*, Vol.41 (2003) pp.277-304



8. Before looking at the levels of burden the RAE puts on the sector it must be recognised that it is difficult to separate out the general dissatisfaction with the RAE from the way in which, certainly in England, it has selectively allocated funds and the impact this has had on individuals, teams, and institutions. The results of the 2001 RAE exceeded expectations, but the failure of the Government to fund fully the results caused extreme concern to the academic community. In many cases, Vice-Chancellors had invested heavily prior to RAE 2001 in the expectation that if they were successful in raising the quality of research in a department to a level of national and some international excellence, funding would follow roughly in proportion to past RAEs. Indeed, of the research submitted at the last RAE, 64 per cent was found to be of national or international excellence, a rise from 43 per cent at the previous RAE. This outstanding success of UK research in universities made the impact of the actual funding decisions following the 2001 RAE doubly hard to bear. These changes have had a significant impact on the finances of those institutions affected by the cuts. It is still not clear how the outcomes of RAE2008 will be used to distribute funding. This means that HEIs are playing the game blindfolded, which has implications for planning/strategy and creates further uncertainty and dissatisfaction with the system. As outlined in UUK's key principles, any new system must provide a sufficiently stable financial framework that allows institutions to invest and plan on the basis of some reasonable assumptions about future levels of income.

9. In terms of the level of bureaucracy imposed by the RAE the funding bodies have calculated that the direct costs of RAE2001 (i.e. costs to the funding bodies) came to £5.6 million, and the expected figure for RAE2008 is £10-£12 million³. Calculating the indirect costs to HEIs is difficult, as there are problems involved in correctly calculating the costs of the RAE as separate from the costs of the management of research activities in a university i.e. how much of what is done for the RAE would have taken place anyway (for example, keeping departmental and institutional research plans up to date, and maintaining information about the research activity and outputs of individual staff). A survey of the costs to the sector of the 1996 exercise produced an estimate of £30 million. A later study of costs produced an estimate (including opportunity costs) of £37.5 million for all HEIs in England - or 0.8 per cent of the total funds allocated on the basis of the RAE's results⁴. HEFCE considers that these estimates reflect the amount of work that HEIs need to undertake for the exercise, over and above what might otherwise be expected of a well-managed institution, and that the costs to HEIs of the planned approach in 2008 will not be radically different. Although this study did not cover HEIs in other parts of the UK, there is no reason to suppose that their ratio of costs to benefits would be substantially different. The results of the next exercise will be used to allocate some £8 billion of research funding across a six-year period. If the total cost were £45 million, this would represent around 0.6 per cent of the resources allocated, comparing favourably with the costs associated with project-based grant allocations using expert review through the Research Councils. UUK recognises that these figures are likely to be an underestimate. However, it was felt that even if

³ HEFCE evidence quoted in 2003-04 House of Commons Science and Technology Committee report *Research Assessment Exercise: a re-assessment*

⁴ Ibid



the costs represented 1 per cent of the resources RAE is used to allocate, an assumption made in a recent HEPI⁵ report on the government proposals, it could still be seen as a reasonable burden within the context of good regulation. These factors would suggest that it is important to keep the administrative burden of the current RAE in perspective when considering reform.

10. Despite this analysis of the direct and indirect 'cash' costs, it is important not to overlook the 'wear and tear' caused by RAE, notably the burden and pressures that it places on individuals and institutions. The problems this has caused are not insignificant. The RAE has also come to dominate and often distort academic and institutional culture and activity. The distortionary effects of the RAE are well documented⁶ and include:

- It can put pressures on universities to only employ staff that can immediately contribute to the assessment exercise, consequently disadvantaging young researchers and those who have taken career breaks.
- It has been criticised for being biased against applied research. To address this panels in RAE2008 have been instructed to give equal weighting to all research, whether basic or applied and to focus upon quality of outputs, though there is still some concern over how this will be catered for in practice.
- The current process still suffers from a difficulty in assessing the value of multi and inter-disciplinary research. The panels also have few international members who can really judge the international standing of research being assessed.
- The perception is that the current system is susceptible to grade inflation.
- The incentives for games playing are significant, meaning that the RAE can lead to short-term, and sometimes unsustainable, distortions in behaviour and decision-making. It also creates fixed investment cycle, which can distort institutional planning and strategies.
- The RAE has been criticised for separating research from teaching, creating an academic culture where teaching has a lower status.
- The RAE is more likely to discourage experiments with new approaches, often rewarding 'safe' research.
- The process has been criticised for lacking accountability between RAEs.
- The RAE takes top researchers (panel members) out of productive research for a significant period of time.

11. A SPRU study⁷ puts the costs and benefits of the RAE within a useful framework that helps understand how, over time, it will produce diminishing returns and ultimately raise questions over the

⁵ Bekhradnia, B & Sastry T *Using metrics to allocate research funds* (Oxford, Higher Education Policy Institute, 2006)

⁶ See, *Supporting basic research in science and engineering: a call for a radical review of university research and funding in the UK* (Royal Society, London, 2003) & House of Commons Science and Technology Committee *Research Assessment Exercise: a re-assessment: eleventh report of session 2003-04*, TSO, Norwich

⁷ Ibid



need for reform. Initially, due to costs involved in setting up and adapting to a new system, the costs of a performance-based approach will outweigh the benefits it brings. Over time, however, the benefits will grow as universities develop clearer goals and strategies and efficiency and performance is increased. After a number of iterations returns will diminish as strategies have already been put in place, and poor performance addressed. Pursuing further full-blown exercises will therefore mean that benefits fall away at an ever-decreasing rate. The SPRU report suggests that for the RAE the benefit curve has peaked and diminishing returns have set in. The scope for further gains by pushing ahead with additional processes is limited. Whilst the SPRU study looks primarily at the direct costs outlined in paragraph 8, it is also possible to categorise the distortionary effects outlined above as additional costs, which would become less easy to accept or justify as the benefits diminish. This produces a compelling argument for reform, but one that would indicate that any new system should seek to maintain and build upon the benefits the RAE has already brought about.

12. UUK therefore agrees with the government that a fundamental reform the RAE is now required. Reducing the burden of a research assessment process on the sector would be welcome. The effort involved in transforming the system would, of course, need to be proportionate to the gains. The need to lighten the burden will also need to be weighed against the requirement for a robust system that is fit for purpose and has the confidence of the academic community. Cost reduction is not the only driver for change and the current review provides a crucial opportunity to examine how the distortionary effects and problems outlined above, such as the way in which user and applied research is recognised and supported, can be addressed. The challenges are significant, and UUK looks forward to working with the government to develop a robust process that can command the confidence of the sector. It will be important that we do not rush this. The fact that RAE2008 will now proceed as planned provides ample time within which to develop a robust alternative.

Response to questions

Question 1- which, if any, of the RAE 2008 panels might adopt a greater or wholly metrics-based approach?

13. Planning for RAE2008 is well advanced, we therefore welcome the announcement that RAE2008 will proceed as planned. It will be important to achieve an early resolution to the issue of whether current RAE panels will make greater use of metrics in the coming exercise. The panel criteria and working methods have already been published by HEFCE and institutions' planning for RAE2008 is well advanced. Our preference would be for minimum disruption to the 2008 exercise.
14. UUK believes that the outcomes of RAE2008 should be the primary quality mechanism informing funding for at least a 3-4 year period. This will ensure that there is relative stability in the system, and that confidence in the coming exercise is maintained. Using RAE2008 as the prime driver for funding for this period will also provide sufficient time to develop a robust alternative. UUK



recognises that a new system that attempts to address the criticisms of the RAE, particularly in relation to applied and user focused research, is likely to produce different outcomes. Therefore, once a new system is agreed, is fit for purpose, and has the confidence of the academic community it is vital that its introduction is managed and moderated to avoid any destabilising effects. Changes will also need to be synchronised across the UK, although the nature and timing of the changes to funding allocations could be applied differently by the different funding bodies. The sector will need to be consulted fully on how this transition process is taken forward.

Question 2- Have we identified all the important metrics? Bearing in mind the need to avoid increasing the overall burden of data collection on institutions, are there other indicators that we should consider?

15. UUK would not support the use of a single metric based on research income. However, a broader set of metrics will have a key role to play in any new mechanism, as they do in the current system, and their use can be further enhanced to bring about significant benefits. It will be important to remember that the type of metrics used, and the way in which they are applied and moderated, is likely to differ between discipline areas due to subject distinctiveness.
16. Most of the metrics suggested to date are proxy indicators of quality, rather than measures of quality. Therefore, expert assessment must also continue within the process, for example overseeing the validity and selection of the metrics, interpreting and, where necessary, moderating their outcomes. If there is no peer involvement it will be difficult to get any mechanism accepted by the academic community. Indeed, in the absence of any formal expert assessment the academic peer community will make its own informal judgements and where there are clear disagreements the metrics-only conclusions would be seriously discredited. Noting that many metrics are UK-centred (such as external income earnings) peer involvement is also needed to ensure that robust internationally benchmarked quality indicators are available for the full range of external customers. We should emphasise that expert assessment would not mean replicating the current full peer review based system, with its myriad of panels. However, as is recognised in the *Next Steps* document, this may involve some high-level light touch structure to verify and moderate outcomes, though the level and extent of peer involvement may vary across broad discipline areas. These considerations indicate a holistic approach to assessment in which metrics play a key role, but where they are not relied on exclusively.
17. The advantages of an increased focus on metrics within any reformed system are that they would introduce simplicity, transparency and reduce bureaucratic burden for universities. Concerns are that metrics may not cover all disciplines adequately, for example Arts and Humanities and the Social Sciences, and could lead to unforeseen behavioural changes and distortions. As suggested above, this would indicate that the type of metrics used and the way in which they are applied will need to be tailored to different discipline areas (even within STEM). Another key challenge will be to identify and develop the metrics themselves. Bearing these points in mind we strongly believe that the relevant peer communities should, at the very least, be involved in selecting appropriate metrics



across broad discipline areas. The commentary below outlines thoughts on some of the key indicators that could be considered as part of this process.

18. Good indicators, which can support and inform any new mechanism, emerge naturally from the research process, so they must be linked to one or more of: inputs > activity > outputs > outcome. It is important that when looking to develop indicators the following are taken into account:
 - relevance;
 - the feasibility of data collection;
 - the quality of the data;
 - the meaning of any metrics generated from the data – in particular, the values that indicate improvement or excellence.

19. Sourcing useful data is a non-trivial consideration. HESA collects data from institutions to a specified format and covers funding, students and staff. Output data are collected from a number of sources that include HESA (PGR students) and others that do not involve institutions (such as book catalogues, journal articles and patents). The most robust metrics relate back to peer review, which is what most academic researchers identify as the 'gold standard'.

20. The five proposals put forward by the government are based wholly or mainly on income metrics, which are input measures, and therefore would represent five variations on a single model. Although various additional metrics are discussed in chapter three of the consultation paper these do not appear to have been incorporated into the final models. Our views on the exclusive use of income-based metrics are outlined in response to question three, and the rest of this section is dedicated to consideration of other indicators.

21. Esteem indicators are only loosely tied to the process and often impossible to validate. They would be unreliable as foreground measures, or used in isolation. They are also difficult to scale: no one claims to have been invited to give a 'minor' presentation at a conference, nor do they give a record of 'fleeting visits' by overseas researchers. Nobel Prizes are clearly highly competitive and peer reviewed but not many people get them. Journal editorships are an option, as are senior roles in learned societies. However, there are eminent people who have done none of these things. Prizes from learned societies could theoretically be a good indicator but only because they are normally not measured. If they became a national indicator then they would proliferate and it would then be necessary to apply a value judgment as to which were genuine and significant (and thus to rule out others). Activity measures are less informative in themselves, although the presence of a substantial PGR population is usually a reflection of a beneficial research environment as is the number, age profile and turnover of research staff, or the number of fellows of learned societies.

22. Output and outcome are therefore often a common basis for analysis:



- PhD awards are a good output measure, because of the examination process. In this instance and in the case of PDRAs, it would be useful to have more and better information about subsequent employment. This would help to add some 'quality' depth to simple numbers.
 - Publications and their impact tend to be the focus for metrics. They have the advantage of always having the key attributes of time, location and discipline so they feed readily into statistical comparisons. However, the patterns of publication (eg. number of papers expected of researchers, the number of authors per paper, the number and acceptance of "leading" journals) differ so widely across disciplines that it is doubtful that such metrics can be used as a major indication of output. Citation data might be more relevant, but these too are subject to similar problems.
 - a. For books, cataloguing is simple enough but there is no quality variable. Number of pages is a weak indicator, sales are inappropriate and the citation data are difficult to collate and probably inappropriate.
 - b. For journal articles, there is an international database for leading journals. The data are accessible, standardised and the background database is recognised as a research resource in its own right. The citation data are detailed, and citation indices are generally (though not always) accepted as a valid metric for a number of STEM disciplines.
 - c. Conference proceedings are important as an output in many disciplines and as a key output in technology areas, where rapid communication with users is important. However, the data are less effectively collated and citation metrics are uncertain.
 - d. Policy reports are an important form of output and may often have high impact, especially when delivered to government departments and used in policy development. There is no central catalogue, however, and the analysis of the impact side is complex.
 - Patents are a specialised form of output, but are difficult to analyse and the information is not universally linked to origin. Furthermore, if patent applications or patents granted were used as metrics, this could rapidly lead to distortions of behaviour.
 - Other forms of output are not currently centrally catalogued in any form.
23. Citation analysis of journal articles can be regarded as a marker of 'performance'. However, changes to the structure of publication brought about through new technologies will in due course supersede traditional journals. Developments in this area will bring their own advantages and create opportunities for the development of new indicators. Much of the work in this area, and the opportunities it presents, is not currently on the radar of policy makers. It is essential that this is explored further before progressing.
24. A key question is the extent to which citation metrics are appropriate as a resource allocation model, because of the impact this could have on behaviour (citation metrics would be open to manipulation). As with input measures, it is likely that they could be used productively, but possibly combined with reduced expert assessment or as part of a basket of indicators. It is also important to



remember that much of the data is based on averages, and will not always get at underlying patterns of performance.

Question 3- which of the alternative models described in this chapter do you consider to be the most suitable for STEM subjects? Are there alternative models or refinements of these models that you would want to propose?

25. Universities UK supports the need for a fundamental reform of the current process. This consultation document has started an important debate about how reform of the Research Assessment Exercise (RAE) can be taken forward post-2008. UUK agrees that the status quo, or marginal changes to the status quo, are not options and the government's willingness to think more radically in this area is very encouraging.
26. As stated in response to question two, the five proposals put forward by the government are based wholly or mainly on income metrics. UUK would not support a system that allocated QR funding wholly or mainly on the basis of research grant and income. We would therefore not support any of the options put forward in the consultation document. There are a number of reasons why we would not support this approach.
27. Crucially, a mechanism that directly relates all Funding Council research support to the income earned through grants and contracts can no longer be regarded as dual support, and would not be consistent with the government's commitments in this area. The dual support system allocates funding against different criteria and assessment processes. As stated above, this means that there are multiple sources of funding for research, with multiple decision points about what research should be supported and where research resources should be concentrated. This creates a healthy and dynamic research base in the UK. We would want this to continue.
28. The justification for a greater reliance on income metrics was initially outlined in the government's *Next Steps* document. In summary, this document proposed that an analysis of research income, at institutional level, shows a high degree of correlation between grant and contract income and QR income, which presents a justification to 'de-duplicate' peer review that takes place under each arm of the dual support. This is an interesting analysis, but is not without its problems. The analysis works well at institutional level, though not so well when looked at the subject level. It also assumes a high level of homogeneity across the sector, failing to recognise differences in institutional size. Concern over the impact on the Arts and Humanities are recognised, but it is likely that these concerns could hold for a wider number of subject areas. In summary, whilst the analysis put forward in *Next Steps* has a useful role to play in the discussion around reform, in itself it does not provide a sufficiently robust basis from which to take things forward.
29. Another key problem with the proposed models is the extent to which they fail to link funding to quality. The consultation document recognises that the quality measures generated by the models

are not very highly correlated with individual RAE UoA ratings. UUK's own modelling⁸, using models B & D and based on the outcomes of RAE2001, would confirm this. Whilst we would accept the criticisms of the RAE, which raise questions over how appropriate it may be as a 'benchmark' for any new system, this does still throw into question the extent to which the models can claim to generate true 'quality indicators'. As stated in our key principles UUK believes a more robust link to the quality of research is required.

30. This would also include developing a more sophisticated way of reflecting the impact or value of applied and user focused research to ensure that it is properly recognised and supported. The reliance on income as an indicator could provide some misleading results, given that some types of research are more costly than others and that some collaborative work may be undertaken on a low or no cost basis. Metrics in this area will need to be robust and indicators of quality, as well as quantity, will need to be included. There will be challenges in developing robust output and impact measures, but it will be important to work with the academic and user communities to understand how these can be incorporated into the system. Whilst government have a laudable intention of promoting applied and user focused research the current proposals deploy a very crude mechanism, which will not allow for this activity to be effectively recognised, supported and incentivised in any meaningful or consistent way.
31. At present research income is aggregated at a fairly coarse level, and there are also issues around data continuity and completeness. It will be important to have robust, reliable and transparent data. Securing this may take some time and involve revisions to current data collection mechanisms in the HE sector. It might be difficult to collect additional data from institutions, particularly if the data also need to be validated, and there will be some initial costs associated with this. We would not support the suggested use of TRAC data to estimate research volume until such a time as this data is sufficiently robust.
32. Under an income based model there would also be a real danger of driving up volume. A key question when using income as a metric is the impact that it would have on grant applications to the Research Councils and other funders, and the possibility of massive over subscription. The move to full economic costing will help take some of the heat out of any potential over subscription, as institutions look to manage their portfolios on a more sustainable basis (as required by the funding councils' financial memorandum), but this problem should not be underestimated. In addition, individual experiences of the Research Councils differ across the sector and between Research Councils. This lack of consistency could be a problem if there were to be a greater reliance on Research Council income as a key metric. Income from Research Councils and different sources will also fluctuate, indeed the advantage of QR based on the periodic RAE is that it has allowed for a stable planning horizon. The time scale used to allocate resources will therefore be important.

⁸ Prof. Andrew Walker, Heriot-Watt University, undertook modelling for the UUK PVC Research subgroup, which is attached as Annex C.



33. An income-based system would also fail to recognise and support those without explicit financial support. This would work against the appointment and progression of less established 'early stage' researchers. UUK also has concern that each of the five models in the government consultation would create an unsustainable transfer market for those academics with a particularly successful track record of winning grants. It is likely that such a system would put significant pressures on individuals.
34. It is interesting to note that the recent consultation on the government's *Next Steps* document sought views on how funding mechanisms can be made more responsive to new research challenges. The focus on income generation could restrict the incentives to carry out and/or support more high-risk research with less obvious benefits or potential.
35. Universities UK has been considering a number of alternative models, but it will be important that we can work closely with the funding councils to expand and build upon work to date, so as to arrive at an assessment and an associated funding process that is fit for purpose and has the confidence of the academic community. We look forward to further dialogue on the way forward.

Question 4- what, in your view, would be an appropriate and workable basis for assessing and funding research in non-STEM subjects?

36. The consultation correctly recognises that an income metric based approach would be largely unsuitable for a number of subject areas, particularly in the Arts and Humanities. However, the distinction made between STEM and non-STEM is vague and appears to lack a clear discussion of the Social Sciences, or clearly identify other areas where this approach may not be appropriate.
37. We are aware of the HEFCE/AHRC working group that is due to report later in October and the suggestion that a 100-point scale be employed which would score: supervision of PhDs, PhD funding, hosting postdoctoral researchers, spending on facilities, number of successful research grants, number of publications and conference papers and other esteem indicators. In general, if metrics were adopted within the Arts and Humanities disciplines, these would indeed need to cover a broad spread of activity – such as that described above. It will also, however, be important that peer review continues to play a significant role in this area. UUK looks forward to seeing the outcomes of this work and being involved in further discussion and consultation.
38. UUK is concerned about the explicit development of two completely different assessment systems. If separate systems are developed it could prove divisive and difficult to operate for institutions. It could also create barriers for collaboration, and would have a negative impact on essential multi and inter-disciplinary research. It could lead to an ossification of the system if different parts of the research base become 'compartmentalised'. Any new system has to provide scope for change and evolution of the research base.



39. UUK believes that there should be a single overarching assessment framework that would allow discipline specific quality assessment, but at the same time would allow sufficient commonality to facilitate comparisons between discipline areas.
40. There is also no explicit recognition in the consultation of what would replace a fundamental aspect of the current system – the provision of a UK wide assessment of research quality that is internationally recognised and can be used to inform the subsequent distribution of research funding.
41. It will be important to have a review mechanism that provides robust quality measures, which each of the devolved Funding Councils can subsequently use to allocate funds on the basis of their own policies. This will also ensure that a single UK wide system is available for international benchmarking and to promote the capability and reputation of the UK research base.

Question 5- what are the possible undesirable behavioural consequences of the different models and how might the effects be mitigated?

42. Systems that measure, and reward, performance or quality will affect behaviour; this is the purpose. It will, however, be important when designing a new system to be aware of and minimise negative distortions. The possible distortionary implications of a solely income based system are outlined in answer to question three.
43. It is interesting to note that there is no explicit outline in the consultation of what the *desirable* behaviour is and how this might be incentivised within a new system. As outlined in the introduction to this response UUK believes that ultimately the prime driver must be to strengthen the ability of universities to sustain and develop research capability, from blue skies through to user and applied, across the spectrum of discipline areas. It is essential that any new system also provides scope for change and evolution of the research base. This will enable the UK to respond effectively to global challenges and ensure that university research continues to play a fundamental role in supporting the UK's economy, health, society and culture.
44. The consultation focuses on a number of specific questions relating to the proposed models, but it will be equally important to understand how any new system fits within and impacts upon broader issues around research funding and policy. For example, UUK has expressed concern over the potential impact that any further radical concentration of research funding would have on the UK's performance, and on what we believe is the necessary integration of research and teaching at university level. The effect of any new system on these and other fundamental policy issues must be considered and tested. Any new system will also impact upon the way that institutions collaborate, either nationally or at an international level.



Question 6- in principle, do you believe that a metrics-based approach for assessment or funding can be used across all institutions?

45. In our key principles document UUK has stated that all subject areas and institutions must be incorporated within the same assessment framework. It will therefore be important that any new mechanism is transparent and even-handed across all sizes and types of institution. Separate systems for different institutions could undermine the prospects for promising units, threaten the equality of institutional opportunity and lead to the ossification of the system as a whole.
46. It is likely that a metrics based system, which is tailored to the needs of different discipline areas, with peer involvement, could be applied across all institutions. The current proposals would not be appropriate because the outcomes they generate are largely a function of quantity rather than quality. A system that is more focused on assessing quality wherever it is found will be more appropriate to universal application.

Question 7- should the funding bodies receive and consider institutions' research plans as part of the assessment process?

47. Research plans are already considered as part of the current process. We would not expect them, however, to play a greater role than they currently do. How these plans would be assessed and weighted within the process would need to be explicit and transparent. The requirements of the plans would need to be light touch and as standardised as possible.

Question 8- how important do you feel it is for there to continue to be an independent assessment of UK higher education research quality for benchmarking purposes? Are there other ways in which this could be accomplished?

48. The current process has two different but related components, internationally benchmarked quality assessment, which then informs the allocation of funds. This has been valuable in encouraging the quality of research activity in UK higher education. The current proposals only deal with the issue of allocating funds. Some form of quality measurement needs to continue, but we would suggest that this must not be completely separated from the funding allocation method.

Annex A

Membership of UUK Research Policy Strategy Group sub-group on RAE reform

Professor Stuart Palmer Deputy Vice-Chancellor University of Warwick (Chair)
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Professor Phil Nelson Deputy Vice Chancellor University of Southampton
Professor Rob Massara Deputy Vice-Chancellor and PVC (Research & Business Development) University of Essex
Professor Neil Halliwell Pro-Vice Chancellor Research Loughborough University
Professor Kevin Edge Pro-Vice Chancellor Research University of Bath
Professor Graham Hooley Senior Pro-Vice Chancellor Aston University
Professor Roger Kain Deputy Vice-Chancellor Research University of Exeter
Professor Peter Blood Pro-Vice Chancellor Research Cardiff University
Professor Sheila Scraton Pro-Vice Chancellor / Director of University Research Leeds Metropolitan University
Mr David Sweeney Vice-Principle Communications Enterprise and Research Royal Holloway University of London
Professor Andy Walker Deputy Principal Resources Heriot-Watt University
Professor Sir Lawrence Freedman Vice-Principal Research Kings College London
Professor Bill Brammar Senior Pro-Vice-Chancellor Research University of Leicester

Annex B

The future of research funding and assessment- UUK key principles

UUK fully supports the need for a fundamental reform of the RAE process. We do, however, feel that there is a need to broaden the scope of the debate that has been initiated by the DfES consultation published in June 2006. We have therefore developed a set of 'key principles' on research assessment and funding, which we strongly believe should shape and direct further policy discussion and developments in this area. These principles will inform a fuller, more detailed, response to the consultation questions, which UUK will submit before the 13 October deadline.

Dual Support

Any new system should be consistent with the government's commitment to continuation of the Dual Support System. UUK agrees with the government that dual support is an effective mechanism to sustain research excellence. A mechanism that directly relates all Funding Council research support to the income earned through grants and contracts can no longer be regarded as dual support. It would also be likely to undermine moves towards recovering full economic costs from grants and contracts, as funders could argue the associated QR is part of the total support package.

QR

Any new mechanism driving QR allocations should be appropriate to the uses that QR is put within a dual system. Whilst the consultation recognises the unique role QR has, this does not appear to have been a central consideration in the design of the proposed system outlined in the consultation. Specifically any new system should support the continuation of the unhypothecated nature of QR, which would be consistent with the block grant principle and the effective operation of the dual support system.

Quality assessment and peer involvement

Funding allocations should be selective and based on a judgement of quality, with peer involvement. The current process has two different but related components, internationally benchmarked quality assessment, which then informs the allocation of funds. The current proposals only deal with the second of these. Some form of quality measurement needs to continue and should not be separated from the funding allocation method.

Metrics will have a key role to play in any new mechanism, as they do in the current system, and their use can be further enhanced to bring about significant benefits. However, most of the metrics suggested to date are proxy indicators of quality, rather than measures of quality. Therefore, expert assessment must continue within the process, for example overseeing the validity and selection of the metrics, interpreting and, where



necessary, moderating their outcomes. If there is no peer involvement it will be difficult to get any mechanism accepted by the academic community. Indeed, in the absence of any formal expert assessment the academic peer community will make its own informal judgements and where there are clear disagreements the metrics-only conclusions would be seriously discredited. Noting that many metrics are UK-centred (such as external income earnings) peer involvement is also needed to ensure that robust internationally benchmarked quality indicators are available for the full range of external customers. We should emphasise that expert assessment would not mean replicating the current full peer review based system, with its myriad of panels. However, as is recognised in the *Next Steps* document, this may involve some high-level light touch structure to verify and moderate outcomes. These considerations indicate a holistic approach to assessment in which metrics play a key role, but where they are not relied on exclusively.

Universality

Any new system should continue to be UK wide and provide universal coverage across discipline areas. It will be important to have a review mechanism that provides robust quality measures, which each of the devolved Funding Councils can subsequently use to allocate funds on the basis of their own policies. This will also ensure that a single UK wide system is available for international benchmarking and to promote the capability and reputation of the UK research base.

Equally, all subject areas and institutions must be incorporated within the same assessment framework (though there may be differences of detail in subject areas as there are in the current system). Different systems that produce different quality measures for some discipline areas, or specific types of institution, could prove divisive and difficult to operate. It would be difficult to draw any meaningful line to separate different systems, it could create barriers for collaboration, and would have a negative impact on multi and inter-disciplinary research. It could lead to an ossification of the system if different parts of the research base become 'compartmentalised'. Any system has to provide scope for change and evolution of the research base.

Applied and user focused research

An appropriate and effective mechanism is needed within any new system to ensure that applied and user focused research is recognised and supported. There is a need for a more explicit recognition of this type of activity. Metrics in this area will need to be robust and indicators of quality, as well as quantity, will need to be included. There will be challenges in developing robust output and impact measures, but it will be important to work with the community to understand how these can be incorporated into the system. Expert involvement should not be limited to the academic community and any new system should have a more robust role for the user and business communities than is currently the case. Whilst government have a laudable intention of promoting this type of research the current proposals deploy a very crude mechanism, which will not allow for this activity to be effectively recognised and supported in any meaningful or consistent way.



Behavioural impact

Any new assessment system should seek to limit the deleterious impact on institutional behaviour.

Systems that measure, and reward, performance or quality will affect behaviour; this is the purpose. It will, however, be important when designing a new system to be aware of and minimise negative distortions. Specifically, any new system should:

- ***seek to limit the incentives for institutions to simply 'chase money'***. If this is not achieved then it could lead to an increase in volume and undo much of the good work in recent years to create a more sustainable research base. UUK is not convinced that any of the models put forward in the consultation would address this in any significant way, indeed there is a serious concern that it would be worse than under the current system;
- ***seek to limit the incentives which have the potential to distort human resource and recruitment practices. Specifically, it should not hamper the development of the next generation of researchers.*** In recent years significant steps have been made to make research careers more attractive and sustainable, and it will be important that we do not take a retrograde step. A solely input based metrics system would work against the appointment and progression of less established early stage researchers. Similarly, much work has been undertaken in recent years to address equal opportunities concerns and this should continue, and underpin any new system. Any new system should also seek to reduce the incentive that creates an academic 'transfer market'. There is the potential that each of the 5 models in the government consultation would create an unsustainable transfer market for those academics with a particularly successful track record of winning grants. It is likely that such a system would also put significant pressures on individuals.

Transition and financial stability

The transition to a new system should be managed and moderated to avoid any destabilising effects.

Any new system should also provide a sufficiently stable financial framework that allows institutions to invest and plan on the basis of some reasonable assumptions about future levels of income. UUK

believes that the outcomes of RAE2008 should be the primary quality mechanism informing funding for at least a 3-4 year period. This will ensure that there is relative stability in the system, and that confidence in the coming exercise is maintained. Using RAE2008 as the prime driver for funding for this period will also provide sufficient time to develop a robust alternative. UUK recognises that a new system that attempts to address the criticisms of the RAE, particularly in relation to applied and user focused research, is likely to produce different outcomes. Therefore, once a new system is agreed, is fit for purpose, and has the confidence of the academic community it is vital that its introduction is managed and moderated to avoid any destabilising effects. The sector will need to be consulted fully on how this transition process is taken forward.



Cost and simplicity

Any new system should seek to reduce the administrative burden on HEIs and the effort involved in transforming the system will need to be proportionate to the gains. Although not the only driver for reform, UUK very much welcomes the government's efforts to reduce the burden of research assessment. Before progressing it will be vital to undertake a thorough assessment of the likely impact of any new model. Such an assessment would need to take into account aspects of research management in HEIs, currently associated with the RAE but which would, in its absence, need to be continued for internal purposes.

Policy fit

There needs to be a more thorough understanding of how the government proposals for reform align with, and impact upon, other policy initiatives and objectives. UUK has some concern that debates around reform of research assessment and funding are taking place within a 'policy vacuum'. Other areas where the implications need to be understood are the development and implementation of full economic costing and the Higher Education Innovation Fund (and equivalent knowledge transfer funding streams under the devolved administrations).