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# Response

**Joint consultation on the review of research assessment:**

**Consultation by the UK funding bodies on the review by Sir Gareth Roberts**

Universities UK's response to the Joint consultation on the review of research assessment as commissioned by the four funding bodies for UK higher education. Submitted in September 2003, the response should be read in the context of Universities UK's key principles, which are available online at <http://www.universitiesuk.ac.uk/principles/> and considered in the light of other government proposals on research, including the Consultation on reforming parts of the Dual Support System: available online at <http://www.universitiesuk.ac.uk/consultations/responses/downloads/dualres.pdf> and the response to the HEFCE Formal Consultation on improving standards in Postgraduate Research Standards; available online at <http://www.universitiesuk.ac.uk/consultations/responses/downloads/hefceres.pdf>

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**Joint consultation on the review of research assessment:  
Consultation by the UK funding bodies on the review by Sir Gareth Roberts**

**Universities UK's response**

1. This is Universities UK's response to the Joint consultation on the review of research assessment as commissioned by the four funding bodies for UK higher education.
2. Universities UK has consulted widely with its members on the proposals contained in the consultation in preparing its response.
3. UUK members have not found the structure of the consultation questions helpful as there are fundamental objections to the need for a 'new' process for assessing basic research capability. The consultation questions are insufficiently connected to each other and our responses must therefore be seen in the context of our previous overarching comments. While we have commented on each of the recommendations in turn, we have not completed the ratings 'agree, strongly agree, disagree' and so on.
4. Our response can be found below in Annex A, as set out in the consultation document.

## Annex A

### Review of research assessment: response form

#### Recommendation 1 (see paragraphs 113-116 of the review)

Any system of research assessment designed to identify the best research must be based upon the judgement of experts who may, if they choose, employ performance indicators to inform their judgement.

##### Comments on recommendation 1:

Universities UK endorses the evaluation of research proposals based on peer review as a 'tried and trusted' approach which is founded on relevant expertise. In the case of RAE assessment the peer review process has broadly worked with large numbers of Units of Assessment in the past. In the new proposals there are caveats regarding panel structure. We are concerned that panels risk being too small to provide a broad basis of expertise, and that they may not be suitable for the assessment of cross-disciplinary, "risk-taking" research. Members of Universities UK have suggested that panels should include users and experts from outside academia. Further clarification is needed regarding rules for the choice of international experts and users and experts from outside academia. This is necessary in order to avoid the introduction of bias from those with potential vested interests.

We are generally in favour of using performance indicators but have two main concerns, firstly, that performance indicators should only be used to the extent that they are appropriate and specific to a given discipline, and that they should be developed in close consultation with the higher education sector. Secondly, that decisions regarding the use and nature of performance indicators must be communicated to Higher Education Institutions (HEIs) as soon as possible, and well in advance of the assessment.

#### Recommendation 2 (see paragraphs 117-126 of the review)

- a. There should be a six-year cycle.
- b. There should be a light-touch 'mid-point monitoring'. This would be designed only to highlight significant changes in the volume of activity in each unit.
- c. The next assessment process should take place in 2007-8.

##### Comments on recommendation 2:

- a) We are broadly in agreement with the proposal for a six-year cycle. However, we are concerned that the proposed cycle would not be in phase with the turnover rate amongst academics and teams, the Spending Review cycle, and with the emerging five-year cycle of the Research Councils. However, phasing the exercise with turnover rate may

be difficult to achieve in practice.

- b) Universities UK is completely opposed to the idea of 'mid-point monitoring'. Even though the intention is for a 'light-touch' approach, this would place a greater administrative burden on institutions and increase the complexity of the exercise. There is no evidence that this approach would produce additional benefit as opposed to duplicating existing processes. Furthermore, such a process would be likely to hamper institutional autonomy in planning. Research volume is already covered by the annual Research Activity Survey.
- c) While there are concerns about the purpose of the RAE as a whole, the date of 2007/8 for the next research assessment process seems reasonable, but only if details of the process are known in time for strategic planning to be possible. We suggest early 2004 as a deadline. The details include panel composition, assessment criteria and performance indicators. Under the current timescale there is a fear that time will run out and it is already quite late to be fundamentally revising the rules of the RAE.

**Recommendation 3 (see paragraphs 127-133 of the review)**

- a. There should be an institution-level assessment of research competences, undertaken approximately two years before the main assessment.
- b. The competences to be assessed should be institutional research strategy, development of researchers, equal opportunities, and dissemination beyond the peer group.
- c. An institution failing its assessment against any one of the competences would be allowed to enter the next research assessment but would not receive funding on the basis of its performance in that assessment until it had demonstrated a satisfactory performance.

Comments on recommendation 3:

- a) We are strongly opposed to the proposed institution-level assessment of research competences and the consultation provides insufficient information on what is being proposed. Our opposition is based on two arguments: that the assessment would represent a considerable additional burden, especially for smaller institutions, and secondly, that whilst the competences themselves are valuable, their assessment should be carried out in a wider context than that of a research review (especially as within the research context, competences can already be assessed via the QAA, the Funding Councils, and through existing RAE practices).
- b) The requirement for institutional research strategies and measures to develop researchers is reasonable as these are areas in which HEIs should already be able to demonstrate their competency. It is not clear what is meant by "dissemination beyond the peer group" and there needs to be further clarification as to the inclusion of equal

opportunities in this particular context.

- c) Universities UK does not agree with this proposal. There is a possible deleterious effect of a continuous process of external review in the case of failing institutions aspiring to enter RQA. Smaller institutions could be at a disadvantage in putting procedures for the process in place. The proposed assessment may amount to nothing more than a “tick-box” exercise which most institutions are expected to pass.

**Recommendation 4 (see paragraphs 134-155 of the review)**

- a. There should, in principle, be a multi-track assessment enabling the intensiveness of the assessment activity (and potentially the degree of risk) to be proportionate to the likely benefit.
- b. The least research intensive institutions should be considered separately from the remainder of the HE sector.
- c. The form of the assessment of the least research intensive institutions would be a matter for the relevant funding council.
- d. The less competitive work in the remainder of institutions should be assessed by proxy measures against a threshold standard.
- e. The most competitive work should be assessed using an expert review assessment similar to the old Research Assessment Exercise.

Comments on recommendation 4:

This recommendation is seen as particularly controversial amongst members because of the effects that these proposals may have on funding allocations, with the consequent effect of greater concentration of funding allocation to the top-rated institutions.

- a) Members have differing views on the question of multi-track assessment; on the one hand multi-track assessment would ensure that the burden of assessment is proportional to the likely benefits. On the other hand, the prior classification of candidates pre-judges the outcome of quality assessment and goes against the principle of free competition among HEIs. If departments were allocated at the mid-point to QR, capability funding or no funding, would there be an appeals process? Universities UK strongly recommends that the methodology is published well in advance so that institutions can decide between the different options. Similarly, the Funding Councils need to make clear the amount of funding that is being allocated to each “pot”. It is clear that information regarding the RQA and RCA tracks must be provided well in advance to allow universities time to calculate the benefits/risks of each route.
- b, c) We strongly disagree that there should be separate treatment for the least research intensive institutions. Members are concerned that this would undermine the prospects of promising units, threaten the equality of institutional opportunity and lead to the ossification of the system as a whole.

- d) Universities UK strongly disagrees with the proposal to assess less competitive work by proxy measures. More detail is needed as to what these measures might be as well as clarification regarding the amount of funding accessible through this option. Consideration also needs to be given to what types of proxy measures could be used in the arts and social sciences; reliable proxy measures in these areas may be very difficult to determine. We would want to know, echoing our point in a) above, whether there would be an appeals procedure for institutions left without or with too little funding to do research.
- e) We have no comment to make on this point; please see our response to Recommendation 1 on institutions' support for the principle of expert review. For controversy over multi-track assessment, see point a) above.

**Recommendation 5 (see paragraphs 156-171 of the review)**

- a. The output of the Research Quality Assessment should be a 'quality profile' indicating the quantum of 'one star', 'two star' and 'three star' research in each submission. It will not be the role of the assessment to reduce this profile to summary metrics or grades.
- b. As a matter of principle, star ratings would not be given to named individuals, nor would the profile be published if the submission were sufficiently small that individual performance could be inferred from it.
- c. Panels would be given guidelines on expected proportions of three star, two star and one star ratings. These proportions should normally be the same for each unit of assessment. If a panel awarded grades which were more or less generous than anticipated in the guidelines, these grades would have to be confirmed through moderation.<sup>1</sup>

Comments on recommendation 5:

While we are generally in agreement with the proposal of a "star" grading system, we are concerned that given the group-based nature of much modern research, these proposals could potentially 'atomise' departments. The individualistic metric based approach does not help in the development of long-term research strategies.

- a) Members are generally supportive of the "star" grading system, welcoming the move towards a continuous grade number and the identification of research excellence within

<sup>1</sup> This consultation question reflects an edited version of recommendation 5. The recommendation in the review report also states that 'the funding councils should provide institutions with details of the relative value, in funding terms, of one star, two star, and three star research, and of research fundable through the Research Capacity Assessment in advance of the assessment. These ratios might vary between disciplines.' In the event that the review recommendations are accepted, each funding council will develop its own policies for reflecting the assessment results in funding, taking proper account of Sir Gareth's recommendation.

units of assessment, rather than average quality of a unit. There is a need for guidelines on how star ratings should be awarded. We are concerned about the possibility of the introduction of a 'grade point average' for a given Unit. A highly-rated sub-unit of assessment could potentially be disadvantaged if linked in with other cognate sub-units with lower ratings. We are somewhat concerned that the more detailed grading will weigh heavily on the individual researcher and thereby threaten collegiality and support for young researchers.

Furthermore, there is an implicit link, not stated in the proposals, between funding allocations and 'star ratings', so that the highest level of funding would go to departments rated 3-star, the next highest would go to 2-star and the lowest would go to departments rated 1-star. Presumably there would be no funding for departments with no star. Without the latter there is no behavioural disincentive to submitting all staff, nor operational meaning to the 80% sanction. Clarification is needed as to how star ratings and funding will be linked.

- b) Universities UK supports the principle of not giving star ratings to named individuals, for the reasons presented in paragraph 163 of the consultation. However, in practice this may not be possible because of the difficulty of safeguarding anonymity in practice, differences in group and individual work between disciplines, the element of differential treatment introduced by the proposal not to publish the rating of "small submissions" and the difficulty in dividing funds awarded for joint work between departments or across institutions. There may be also be difficulties of preserving anonymity where the size of a research group is small. It has been suggested, however, that for reasons of transparency and freedom of information individuals should be identified.
- c) We reject the idea of guidelines on proportions of star ratings. Firstly, the criteria for the guidelines are insufficiently clear. We would also need reassurance that, were this to happen, expected proportions and associated funding must be announced well before the assessment. Our argument against pre-set proportions is that they would presuppose the international quality of British research in a given subject, deprive assessment of an objective frame of reference and thus be unfair to towards expert assessors and institutions. Furthermore, the distributions may differentially affect some subject areas and may be driven by funding issues.

**Recommendation 6 (see paragraphs 172-197 of the review)**

- a. There should be between 20 and 25 units of assessment panels supported by around 60 sub-panels. Panels and sub-panels should be supported by colleges of assessors with experience of working in designated multidisciplinary 'thematic' areas.
- b. Each panel should have a chair and a moderator. The role of the moderator would be to ensure consistency of practice across the sub-panels within the unit of assessment.

- c. Each panel should include a number of non-UK based researchers with experience of the UK research system.
- d. The moderators of adjacent panels should meet in five or six 'super-panels' whose role would be to ensure consistency of practice between panels. These 'super-panels' should be chaired by senior moderators who would be individuals with extensive experience in research.

Comments on recommendation 6:

a) We are in general agreement that the existing panel structure is worth retaining for the next exercise. The introduction of structures that increase consistency of practice and take into account multidisciplinary work is welcomed in principle. However, we are doubtful that this can be achieved as the system is too complex, burdensome and time-consuming. We have serious reservations regarding the capacity of the system to measure research outputs from multidisciplinary units of assessments as problems could arise where submissions are made from groups who have used more than one unit of assessment. There needs to be greater clarification regarding the selection of panels.

b) We acknowledge that there may be advantages and disadvantages regarding the proposal to have a chair and a moderator for each panel. There is support from some institutions for the proposal to have a moderator. On the one hand this could work to ensure consistency as long as moderators meet throughout the process. On the other hand such a system could lead to tensions. In a conflict situation, does the chair or the moderator hold sway?

c) The inclusion of international researchers is accepted in principle and could provide further objective assessment. The RAE must provide an objective measure of the international stature of research in institutions and it has proved to be a useful quality indicator in international relationships. We would, however, challenge the mechanism underpinning this proposal. There are practical problems posed by the length and complexity of the proposal and there is a risk of tokenism, with a few international researchers asked to judge a range of disciplines at panel level. Furthermore, we would need to ensure that such researchers would have a sufficiently good understanding of the UK research system to bring benefit to the exercise.

d) We remain concerned that moderators would need both independence and expertise. However, we agree that consistency of approach across the panels is important and the development of 'super' panels including senior moderators would be one mechanism by which this could be achieved. Nevertheless, the benefits of this additional "layer" of administration may be outweighed by the extra bureaucracy involved.

**Recommendation 7 (see paragraphs 198-204 of the review)**

- a. The rule that each researcher may only submit up to four items of research output should be abolished. Research Quality Assessment panels should have the freedom to define their own limits on the number and/or size of research outputs associated with each researcher or group.

- b. Research Quality Assessment panels should ensure that their criteria statements enable them to guarantee that practice-based and applicable research are assessed according to criteria which reflect the characteristics of excellence in those types of research in those disciplines.

Comments on recommendation 7:

- a) Members have a number of points to make with regard to the proposed abolition of the four publications rule. Different limits may be appropriate for certain disciplines, but we would request early clarification of the new rules. Quantity should be limited to take into account individual circumstances such as discipline and workload. Quality criteria, however, need to remain universal. Staying with the old rule would be useful from the point of view of stability, clarity and comparability.
- b) We overwhelmingly support the proposal to enhance the recognition of applied and practice-based research. We urgently request the publication of transparent guidelines to assist this process, so that applied research is properly captured in the metrics applied.

**Recommendation 8 (see paragraphs 205-213 of the review)**

- a. The funding councils should work alongside the subject communities and the Research Councils to develop discipline-specific performance indicators.
- b. Performance against these indicators should be calculated a year prior to the exercise, and institutions advised of their performance relative to other institutions.
- c. The weight placed upon these indicators as well as their nature should be allowed to vary between panels.

Comments on recommendation 8:

In addition to our comments below, we discuss the introduction of performance indicators in our response to Recommendation 1.

- a) We are cautious about the introduction of discipline-specific performance indicators. We welcome this proposal on the following conditions: that indicators are only used as far as they are appropriate to, and recognised within, the different disciplines. This implies close collaboration with the subject communities in their development. Whilst this development may take some time, indicators will need to be clearly defined in time for institutions to prepare for the next assessment.
- b) Regarding the calculation of performance a year prior to the exercise, we are concerned that this does not leave enough time for appropriate decision-making. We recommend that these indicators are calculated three years prior to the exercise. A further concern of members is that this calculation will add to institutions' burden of work.
- c) In accordance with comments on a), varying weighting of indicators is welcomed, on the

condition that subjects communities are involved in determining this weighting, and that the specifics of this process are clarified.

**Recommendation 9 (see paragraphs 214-234 of the review)**

- a. Where an institution submits to Research Quality Assessment in a sub-unit of assessment all staff in that sub-unit should become ineligible for the Research Capacity Assessment, even if they are not included in the Research Quality Assessment submission.
- b. The funding councils should establish and promote a facility for work to be submitted as the output of a group rather than an individual where appropriate.
- c. The funding councils should consider what measures could be taken to make joint submission more straightforward for institutions.
- d. Where an institution submits a sub-unit of assessment for Research Quality Assessment, no fewer than 80% of the qualified staff contracted to undertake research within the sub-unit of assessment must be included in the submission.
- e. All staff eligible to apply for grants from the Research Councils should be eligible for submission to Research Quality Assessment.

Comments on recommendation 9:

a) We are generally in favour of this proposal. However, there are practical problems regarding the classification of units with staff involved in joint projects with other institutions that are less or more research-intensive or regarding more and less advanced research groups within the same unit. It is difficult to discern at present whether such a rule would enhance or reduce game-playing.

b) We are broadly supportive of the introduction of a facility for the submission of group work. Again, we would like more specific information, for example, on the definition of a group and whether this refers to intra- and/or inter-institutional groupings. It is possible that this could be achieved through the old assessment system. Game-playing could result from this proposal.

c) We also support the idea to facilitate joint submissions, however we have practical reservations. Rules for joint submission need to be thoroughly considered regarding the assessment process and equality of treatment. These should be made clear as early as possible. It may be that few partnerships would be willing to take on the administrative burden involved.

d) Universities UK is opposed to the proposal of compulsory inclusion of at least 80% of research staff in sub-units, where 'staff' is defined as those both contracted to undertake research and eligible for inclusion in the assessment (footnote 23, paragraph 229). This would only be acceptable in certain institutes or centres. There are a number of reasons for

our lack of support for this proposal: the likelihood of game-playing through changes in contracts, it is unfair to teaching-only staff, it undermines the principle of recognising excellence wherever it is found and the numbers of staff involved should be irrelevant in an assessment that determines the "absolute" strength of a research unit.

e) We agree that all staff eligible to apply for grants from the Research Councils should be eligible for submission to Research Quality Assessment. However, it should be borne in mind that researchers' ability to apply for grants varies across the Research Councils.

### **Recommendation 10 (see paragraphs 235-238 of the review)**

Each panel should consider a research strategy statement outlining the institution's plans for research at unit level.

Comments on recommendation 10:

Universities UK believes that research strategies would be a good signal of research in less research intensive settings, but it is hardly an 'output' measure. However, it is unlikely that such a proposal would contribute to the exercise as HEIs already have research strategies in place. Furthermore, the value of this proposal would be questionable if the research strategy and the research assessment took place at two stages that were several years apart. Clear guidelines would need to be produced on how panels would use the research strategies.

### **Question 11 Burden for institutions**

The review proposals have been designed to make the burden of assessment proportionate with the possibility of financial reward.

Comments on question 11 – burden for institutions:

We believe that in order to answer this question, institutions would require much better knowledge of assessment mechanisms and the distribution of financial rewards. At present these are unclear. Prompt publication of these details is needed. A major difficulty with the proposal is that it threatens the financial stability incentive provided by research assessment, thus serving to discourage developing and aspiring research.

### **Question 12 Value of research assessment**

What value do you place on the research assessment if the financial reward is likely to be small?

Comments on question 12: value of research assessment

The views we have had on this are mixed to date. Generally it seems the value is low, but that the assessment provides valuable incentives for improvement. This merit is, however, threatened by the new proposals. If the financial reward is likely to be small, then the incentives for improvement would be driven by a competitive marketplace; a system that appears to work in the USA.

### **Question 13 Equality of opportunity for all groups of staff**

The funding councils wish to promote equality of opportunity for all staff regardless of age, sexual orientation, political belief, disability, gender, race or religion and seek to ensure that its research assessment policies are compatible with this objective.

Comments on question 13 – equality of opportunity for all groups of staff:

Universities UK agrees with the intention that research assessment objectives should be compatible with promoting equality and diversity. However, more evidence is needed as to how this is being achieved. There is insufficient consideration paid to the circumstances of young researchers, part-time staff and late entrants to higher education. The proposed concentration of funding may disadvantage less research-intensive institutions working to widen participation and may lead to further segregation of research.

### **Question 14 Overall approach of the review**

Notwithstanding your views on any specific recommendations, and given the responses to the earlier 'Invitation to contribute', do you agree or disagree with the broad approach taken by the review to the question of research assessment?

Comments on question 14: overall approach to the review:

Universities UK is critical of the exercise as its overall aim is not clear and it is, essentially, a form of competition. The exercise has a tendency to be exclusive and narrow, is liable to separate teaching from research and is inadequate in terms of assessing lone researchers. It has the potential to be detrimental to future diversity and the development of the new universities and their students and staff. The burden of implementing the proposed changes is likely to outweigh the benefits for institutions. The necessary full advance publication of the funding methodology is unlikely to be achieved.

### Question 15 Further comments

Question 15 – any further comments

We have two points to make, firstly the review's lack of openness regarding funding implications. We would ask HEFCE for a "commitment to openness" prior to the submission of entries for the assessment. We are also concerned about the consequences of the concentration of research funding, the adverse effects of which can only be countered by sufficient RCA funding. So far this point has not been made clear. Overall, Universities UK believes all the worthwhile recommendations of the review could and should be introduced within the framework of the existing review.