



Response

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

Universities UK response to Commission staff working document: Simplification in the 7th Framework Programme

We are pleased to be able to respond to this consultation and very much welcome the Commission's commitment to simplification of EU research through the Framework Programme. We have provided a response to each of the ten action points outlined in the Commission staff working document.

The working document can be found at:

http://europa.eu.int/comm/research/future/pdf/ec_2005_0431_1_en.pdf

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Universities UK response to Commission staff working document: Simplification in the 7th Framework Programme

About Universities UK

1. Universities UK represents all UK universities and some higher education colleges in the United Kingdom. Our 121 members are the executive heads of these institutions. Universities UK works to advance the interests of universities and to spread good practice throughout the higher education sector. Our mission is to be the essential voice of UK universities by promoting and supporting their work.

Summary

2. We are pleased to be able to respond to this consultation and very much welcome the Commission's commitment to simplification of EU research through the Framework Programme. We have provided a response to each of the ten action points outlined in the Commission staff working document. In summary we would like to make the following key points:
 - The UK higher education sector welcomes the Commission's commitment to simplification of EU research support through the three principles outlined in the paper. Efforts to provide continuity in FP7 with FP6 are also welcome.
 - We would encourage the Commission to set down service level statements that commit them to performance standards in relation to simplification. This would send out an important message that the Commission are fully engaged and willing to be judged on the simplification agenda.
 - There needs to be a clearer up front focus in the paper as to how the simplification measures outlined will improve the Framework Programme for users, both scientists and those managing and administering activities. Providing a timely and efficient service to applicants should be the prime rationale for this simplification exercise. As currently drafted, many of the measures that have been proposed seem to focus on improvements for the Commission rather than users.
 - We are very concerned over the proposed move towards the greater use of lump sum and flat rate financing. We do not believe that this will provide any significant simplification, indeed it could work against the principle of continuity and create more problems than it is

intended to solve. Flat rate and lump sum financing would also work against the need to create a more financially sustainable research base in universities.

2.1 A simple set of funding schemes allowing continuity with the instruments of FP6 and providing a broad flexibility of use

3. We agree with the need to provide participants with the flexibility to determine the most appropriate instrument to address a specific research question. This is very much in line with the Marimon recommendations.
4. Problems due to restrictions on which instruments are eligible under particular research themes have been detrimental in the past; therefore greater flexibility in this area would be beneficial. The most effective instruments are those that the research teams select and not those that have been pre-allocated by DG Research.

2.2 Consistent, high quality communication

5. We welcome the approach outlined by the Commission to put a greater focus on ensuring clear and consistent communication with a reduction of the use of jargon. We support the proposal that all information materials should be reviewed by external users and communication experts prior to publication. It is also important that information materials are standardised across DGs operating research funding programmes.
6. We welcome the move to avoid the unnecessary duplication of information in different documents, to exclude the possibility of differing interpretations. In this vein guidance material should be rationalised. In many instances it is not always clear to applicants which, or how many documents they ought to read and at which stage, documents should therefore be clearly signposted.
7. Calls should be published with a clear timeline giving applicants an idea of when key stages will take place and indicating the level of information that will be required at each given stage. Applicants should be able to monitor the progress of their proposal via a web-based system. This is becoming the norm with many sponsoring bodies. This would introduce full transparency to the system, indeed it is often the lack of access to this kind of information that is at the root of many problems.
8. We support the setting up of a 'clearing house' system for providing information on the legal and financial provisions of contracts. It is important that this is underpinned by a clear procedure for deciding which queries should be referred to the clearing house. The success and usefulness of these new developments will rest on their being set up in good time and the help desk being staffed properly, both in terms of the number and level of training of those individuals deployed.

2.3 Rationalisation of the requests for information addressed to the participants

9. The UK HE sector endorses the extension of the two-stage submission procedure to any relevant call for proposals. It is important that this should include an outline proposal at the first stage i.e. an application that is significantly shorter and less complex than a full second stage proposal. Requirements for each stage should be set out in advance, and additional requirements should not encroach on the process during the life of the Framework Programme. Clear evaluation criteria need to be used for both stages. There is also a need to make sure that the two-stage process does not lead to excessive increase in time to evaluate proposals.
10. The proposed introduction of an electronic registration desk and single identifier system to rationalise requests for information from participants is encouraging. It is important the Commission ensure that the system can deal with registering different parts of a single large organisation, such as a university, and avoid duplication. It is also important that any system does not allow access through unauthorised channels within large organisations. The UK Research Councils, who have just moved over to an electronic system, will be able to provide valuable expertise and advice in this regard. All electronic systems must be tested properly and piloted in advance of being rolled out. This may also require running systems in parallel.
11. FP7 must be consistent across all parts of the programme with respect to reporting requirements, we would therefore support the efforts to simplify and clarify this. Current reporting requirements under FP6 put a significant burden on consortia and in many cases the number of reports that co-ordinators have to prepare are unreasonable and disproportionate.
12. We welcome the move to review the number of audit certificates. It is important to ensure that audit requirements are proportional. For some smaller partners, for example in a NoE, the costs of audit can on occasion outweigh costs incurred. This type of situation represents a waste of time and money for all involved. It is important that in situations like these there is sufficient flexibility in the system to ensure that disproportionate costs are not imposed.

2.4 Guaranteeing the protection of the Community's financial interest without imposing an undue burden on participants by reducing a-priori controls to a bare minimum

13. We agree with the principles, as set out in this section, to protect the Community's financial interests. A clear definition of public bodies and any specific procedures or regulation that apply to them must be set out in the Rules for Participation.
14. A definition of universities is required that covers all universities, and does not exclude UK universities because they are not government owned, as is the case with universities in other countries. A lack of clarity in this area caused a number of problems under FP6, leading to over bureaucratic requests for proof of legal status and other supporting material.

2.5 Full operational autonomy entrusted to consortia

15. We would strongly endorse a move towards ensuring greater flexibility without excessive reporting and micro-management by the Commission. It is important to promote manageable consortia combined with appropriate operational and financial autonomy
16. FP6 allowed consortia to have a much higher degree of autonomy and flexibility in operation. This autonomy, however, led to an increase in the management and administrative burdens. Within the context of a 7% ceiling on management costs this became quite hard to manage for many. One solution for large consortia that may have difficulty managing administrative burdens, such as audit costs, within the 7% ceiling of management costs, might be to index the percentage of management costs to the number of participants above the 7% ceiling.

2.6 Streamlining the selection process

17. It is important that the role of Programme Committees is assessed in an open and transparent way. Such an assessment does not appear to have been undertaken (or at least is not referenced in the paper). If it is deemed that this aspect of the process is superfluous then it should be reviewed. It is however important that transparency and confidence is maintained by light touch oversight procedures.

2.7 Most effective possible use of the budget dedicated to the research policy

18. We have no specific comments on this proposal, as it does not outline a clear or specific way in which the Framework Programme could be simplified. Instead it appears to be a statement on financial management. We would welcome further clarity on the intentions behind this 'principle'.

2.8 A more extended use of flat rate financing within a simplified framework of forms taken by Community financial contributions

19. We have concerns over the Commission's proposal to increase lump sum financing. Whilst this would provide a means to facilitate simplification for the Commission it is not conducive to appropriate budget planning and management by participants. The costing and pricing of research is currently relatively straightforward for applicants and well understood, changing this would work against the stated aim of continuity and provide no significant benefits. We would therefore urge the Commission to rethink this policy.
20. In the areas of FP6 where a form of lump sum or flat rate financing is used i.e. NoEs and the Marie Curie Actions, feedback from participants suggests that it does not result in any

significant improvements in finalising contracts. In this vein this initiative would represent a change rather than a simplification and should be reconsidered.

21. We foresee that lump sum financing could also run in to a number of other difficulties:

- Rates may need to be differentiated according to scientific discipline (depending on which elements of the project were included in the flat-rate), as clearly there are significant cost differences. It is likely however, that categorisation of disciplines will prove problematic. If the categorisation of research areas is too general, it will not sufficiently take into account differences between areas within a single discipline, or differences between projects in an area. This will lead to projects being either under- or over-funded. If a categorisation system is developed that takes into account such differentiation and involves multiple funding rates, it will be extremely complicated system;
- Funding based on scale of unit costs may also work against supporting inter-disciplinary research. Inter-disciplinary projects will either involve multiple rates within a single project, or researchers using the rates set for another discipline. The implications are that this could introduce undue complexity and confusion if these rates are significantly different. Far from simplification this added complexity could deter participants from undertaking this activity, at the very time that we should be encouraging it;
- It is possible that lump sum financing would attract similar problems to those experienced by participants in FP6 NoE, namely the confusion and difficulties in consortium management due to the fact that the grant calculation does not equate to project spending.

2.9 Removing the need for complex cost reporting models and clarifying definition of eligible costs

22. We are concerned that changing the cost models would work against continuity and actually make the system more complex for universities. We feel strongly that continuity is crucial to the success of FP7 and adapting existing procedures, rather than introducing new ones, is the most effective method of simplification for participants.
23. Flat-rate financing for certain individual project element (such as indirect costs) is feasible, though it is essential that rates are fixed at a level that can ensure the financial sustainability of the research base in universities. It is important that the goals of the ERA are not achieved at the expense of the university infrastructure, or else we will be stocking up problems for the future. Therefore, a flat rate of 20% would be wholly insufficient.
24. In the UK, increased use of lump sum and flat rate financing would run in direct opposition to the move towards Full Economic Costing. Full Economic Costing in the UK has been a welcome policy, which is enabling universities and sponsors of research to work towards a more sustainable research base. We believe that participation on the basis of the real cost of

research is essential for a sustainable European Research Area, and it is vital that the Commission, as a major funder of research, engage fully in this agenda.

2.10 Simplified support rates per type of activity

25. We would welcome further clarity on the statements outlined in this section. It is not clear how the proposed modifications of support rates would offer any concrete improvements in terms of simplicity of levels of financing, since participants would continue to calculate eligible costs incurred and the principle of co-financing based on the state aid framework would still apply.

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