



Response to the Reform of Higher Education Research Assessment and Funding Consultation

The 1994 Group (see Annex) welcomes the consultation on the Reform of Higher Education and Research Assessment. The Research Assessment Exercise (RAE) has enabled the UK to prove its demonstrable excellence in research in all fields of study. We strongly support the Government's desire to reform the RAE in order to lighten the burden on Higher Education Institutions but would emphasise that such reform must strengthen not weaken our ability to demonstrate the excellence of UK research.

Before answering the questions listed in the consultation document, we would like to make the following key points.

1. Research Assessment is, and must continue to be, about supporting research excellence, wherever this is found. Excellence is primarily measured by research output, and there must be peer oversight of the assessment process.
2. The RAE has been vital for quality benchmarking and branding, particularly in International markets. It allows reliable comparisons to be made between subject units, institutions, and countries. It is essential that this aspect is preserved if the UK is to retain its position as a world leader in higher education research.
3. We hold the independence of the current RAE as critical. There is a continuing role for higher education institutions and the Funding Councils in any future assessment and funding system. We strongly endorse the Government's continued support for the Dual Support system. The continuation of QR funding is critical to enable Institutions to manage their research strategically. It should not, however, provide a direct subsidy for research funders, that would be in conflict with the principles of full economic costing.
4. The basic principles and framework underlying any future system for assessing quality and allocating funding needs to apply to all disciplines.
5. A revised research assessment exercise must be based on a basket of appropriate and robust measures of research quality, with the greatest weight placed on indicators of research output.
6. The outcome of RAE 2008 needs to lead to a rational and stable funding system. The results of the exercise should inform funding allocations until an appropriately robust new assessment mechanism that covers all disciplines is in place. If, in the future, allocations are determined annually, they need to be based on rolling averages over a period of time.

Our detailed response (attached) covers each of the questions raised in the consultation document. We have chosen to respond to some of these out of order in order to present what we consider a more rational argument.

We welcome the Review Group's positive and open engagement with the sector in the development of its reform proposals. We look forward to further opportunities for us to positively engage with the Group as it begins the detailed work required to develop a robust and sustainable metrics informed assessment system.

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

- 1.1 We strongly welcome the announcement in 1.10 that the '2008 RAE should proceed largely as planned.' We are concerned, however, at suggestions that panels might adopt a greater or wholly metrics-based approach in the 2008 exercise. We do not believe it appropriate for panels to change their approach to the 2008 exercise at this late stage. The detailed results of this consultation process will be available until November 2006. As the deadline for submission to the 2008 RAE is 31 October 2007, this would leave less than a year for institutions to factor in substantial changes to the 2008 RAE into their institutional submission strategies. We would not consider it acceptable to change the operation of the RAE at such short notice.
- 1.2 Research-intensive universities are well into the final stages of planning for their RAE submissions based on the individual panel criteria statements released in January 2006. These statements were finalised following an extensive consultation process that included questions relating to the appropriate contribution of metrics to the UoA graded profile. We believe, therefore, that the sector has already had adequate opportunity to debate this question and that the consequences of this are reflected in the final panel criteria statements for which, in some cases, metric data will contribute up to 50 per cent of the assessment. A change of criteria at this late stage would lead to a loss of confidence in, and undermine the credibility of, the current system.
- 1.3 We are very concerned about the proposal that a new metrics based system 'would be phased in from 2009/10 in England.' When, and how, 'metrics' are phased in will depend on the outcome of the shadow exercise being conducted alongside RAE 2008 and a consideration of these results amongst the subject communities.

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?

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

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

- 2.1 The results of a new metrics-driven research assessment exercise must serve the dual purpose of assessing research quality and be used by the Funding Councils to distribute their QR funding allocations. We would not support the establishment of a new research assessment system which had no connection to the allocation of QR funding.
- 2.2 We believe that a fundamental principle for the operation of any research assessment and funding system is that it operates for all subject areas and all institutions. This is a critical strength of the existing RAE and must not be lost in any new system. The common assessment system used in the RAE has consistently produced results respected by the entire sector enabling easy judgement of relative research performance across all subject areas.
- 2.3 The estimated costs associated with the operation of the RAE include costs incurred by institutions in the management of research. It must be recognised that whilst the replacement of the RAE with a metrics-driven assessment system would lighten the institutional burden of assessment considerably, the new system would not remove

the substantial cost and workload associated with the management of international quality research.

- 2.4 We suggest that the following process should be used to develop and operate an assessment system appropriate for use across all subject areas and all institutions:
- (i) Peer oversight is a fundamental strength of the current RAE and must not be lost within any future assessment and allocation system. Despite some of the negative comments in our response in relation to the individual metrics outlined in paragraph 5, we strongly support the potential for the development of a basket of subject specific input and output measures for use in research assessment across all subject areas. It must be noted, however, that there is currently no proxy measure to measure research output. Until a robust measure can be found, a 'light touch' system of peer review of research output would need to sit within the wider metrics driven assessment framework;
 - (ii) The RAE 2008 main panels should be asked to undertake work to develop a basket of subject specific measures, for use in a future system. The main panels would have responsibility for determining the appropriate measures and their relative weightings, within given constraints;
 - (iii) In future years, the RAE main panels or nominated individuals from subject communities would retain control of the decision making process surrounding the appropriate measures to be collected and weightings between the measures used to determine research quality, adjusting them according to experience and the development of the subject area;
 - (iv) The Funding Councils play a fundamental role in determining how the results of research assessment are translated into institutional funding. Under any future funding mechanism this fundamental role must not be lost nor subject to interference from central government departments.

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?

- 3.1 The RAE has enabled the UK to prove its demonstrable excellence in research in all fields of study. It is extremely important that a future metrics-driven research assessment system enables the continued international benchmarking of UK HE. We are worried, however, that the removal of the simple quality grades in the 2008 RAE has already reduced the effectiveness of the RAE as a tool for international benchmarking. Thought should be given in any future system to the reintroduction of a simple comparative measure at subject (rather than institution) level. We believe that the subject specific baskets of appropriate input and output measures could provide robust data for use in this benchmarking process.

Should the funding bodies receive and consider institutions' research plans as part of the assessment process?

- 4.1 We strongly support the Government's determined drive to reduce requirements on institutions to provide information when there is no clear reason for its collection. If it can be demonstrated, however, that the expert panels would find institutional research plans helpful in determining research quality within a metrics-driven subject level assessment process, we would be supportive of its provision. However, we suspect that the expert panels will determine that such contextual information is of little use.

What are the possible undesirable behavioural consequences of the different models and how might the effects be mitigated?

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?

5.1 We are seriously concerned that any model overly dependent on the influence of one metric will distort institutional behaviour. For example:

- (i) *RCUK & Charity Grant Allocations:* If QR allocations slavishly followed RCUK charity grant allocations, institutions will encourage academic staff to chase this income. There is a substantial variation of RCUK and Charity income available across and even within disciplines. Over-reliance on this metric would have a substantial distorting effect on the range of research activity undertaken in UK HEIs. In addition, there is evidence that the grant applications process is less cost efficient than the current RAE. Placing additional strain on the research councils and charities has the danger of apparently reducing costs in one area whilst substantially increasing them in another. In particular, a substantial increase in grant applications not matched by increased funding to RCUK would result in huge wasted costs to both institutions and the research councils;
- (ii) *Contract Income:* We strongly support the inclusion of a metric to measure the quality of translational/applied research. There are, however, substantial technical difficulties associated with the use of contract income from industry for this purpose. If there was to be substantial credit under a new assessment system for contract income there is concern that substantial under cutting of FEC pricing would occur to ensure that institutions win contracts. This price war would work against welcome reforms to FEC, as it would seriously threaten the sustainability of research and not be in the long-term interest of the Treasury or institutions. In addition, there is a wider concern over the reliability of the data. Contracts are often issued for work that should not be defined as research and it would be difficult to differentiate this from genuine applied research;
- (iii) *Additional effects:* If the only metrics to be used are based on research income, there will be pressure on HEIs to focus their research activity towards subjects and, indeed, sub-areas of subjects, where it is possible to generate significant external grant income, resulting in a bias against particular types of, or approaches to, research. Within departments there will be pressure towards recruiting staff that have strong records of winning external grant awards. This will lead to a bias against the employment of new researchers who have not yet established such track records. A strength of the 2008 RAE is that considerable efforts have been made to ensure that there is no bias against such staff. Similarly, unless the metrics are extended to include PGR student numbers and completions, there will be less incentive for Departments to take on such students. Their staff would be better off spending their time supervising research assistants.

5.2 The basket of metrics in section 4 and in Appendix 2 covers most of the areas we believe appropriate for incorporation into a basket approach to a metrics-based assessment. We offer the following comments on the relative appropriateness of some of the metrics suggested:

- (i) *Staff Submitted:* One of the key strengths of the 2008 RAE is the panels' ability to recognise and reward a department's overall research environment.

There is a strong danger that this element will be lost in a metrics-driven system. We believe that the simplest and clearest indicator of the depth in quality of departmental research is the proportion of research-active academic staff that were submitted for assessment. We strongly support the incorporation of this indicator into any new funding mechanism;

- (ii) *PHD Student Numbers*: There is a danger that institutions will be tempted to artificially increase enrolled student numbers to improve performance on this metric. Any metric incorporating the numbers of postgraduate students must therefore incorporate the numbers of completions as well as total FTE student numbers. Both sets of data should be normalised per number of research active staff FTE.
- (iii) *TRAC Data*: We do not consider an estimate of the time spent on research activity declared through TRAC to be an appropriately metric for the assessment of research quality;
- (iv) *Bibliometrics*: We think that bibliometric measures have a role to play in the assessment of disciplines or sub-disciplines where they are accepted by the subject community as sufficiently robust. It is unlikely, however, that it will ever be possible, or cost effective, to develop suitably robust bibliometrics for all disciplines;
- (v) *HEIF Data*: As with the use of TRAC data above, we are concerned whether data collected through the Higher Education: Business and the Community Interaction Survey are suitable for use in assessing research quality. We are also concerned that the incorporation of HEIF data into the QR allocation mechanism would effectively result in a merger of the two distinct funding streams. We strongly support the continuation of a separate HEIF funding stream and would not support its incorporation into QR;
- (vi) *Research Council Reports etc*: The possible metrics listed in Section 4.6 cover a wider range of different measures. We are not clear how the mostly qualitative data identified might be incorporated into a quantitative metrics based allocation mechanism. There is currently so little comparability in Research Council end of grant reports in terms of the requirements for and assessment of these reports that the data is of no use;
- (vii) Finally we were confused, and somewhat concerned, about the final sentence of paragraph 4.2 in the document, which states that metrics could be weighted against “any outcomes that it is considered desirable to incentivise”. We hold the independence of the Funding Councils in the management of the research assessment system and in the allocation of QR funding as critical. This ‘independence’ needs to be preserved in future assessment and funding systems in order to maintain the integrity of the system.

Annex

The 1994 Group is made up of nineteen internationally renowned research-led universities. Each member undertakes diverse and high quality research, while at the same time ensuring excellent levels of teaching and student experience.

The 1994 Group provides a central vehicle for member institutions to protect their common interests in the higher education market, to respond quickly and efficiently to key policy issues, and to share best methods and practice for the smoother running of their own institutions. The Group, while working on this collaborative basis, recognises the need to preserve the distinct character and traditions of each individual member. There is ongoing assessment of how the Group's shared strengths and each member's distinctive elements can be promoted to best meet the diverse needs of students and staff, employers and industry, research councils, government agencies and all other stake-holding groups in the higher education sector.

Current members of the 1994 Group are Bath, Birkbeck, Durham, East Anglia, Essex, Exeter, Goldsmiths University of London, Lancaster, Leicester, Loughborough, Queen Mary University of London, Reading, Royal Holloway University of London, School of Oriental and African Studies University of London, St Andrews, Surrey, Sussex, Warwick and York.