Reform of higher education research assessment and funding

Consultation Response Form

The closing date for this consultation is: 13 October 2006
Your comments must reach us by that date.

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The information you provide in your response will be subject to the Freedom of Information Act 2000 and Environmental Information Regulations, which allow public access to information held by the Department. This does not necessarily mean that your response can be made available to the public as there are exemptions relating to information provided in confidence and information to which the Data Protection Act 1998 applies. You may request confidentiality by ticking the box provided, but you should note that neither this, nor an automatically-generated e-mail confidentiality statement, will necessarily exclude the public right of access.

Please tick if you want us to keep your response confidential. ☐

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If your enquiry is related to the policy content of the consultation you can contact Jim Cutshall on:

Telephone: 020 7925 6371

e-mail: james.cutshall@dfes.gsi.gov.uk

If you have a query relating to the consultation process you can contact the Consultation Unit on:

Telephone: 01928 794888

Fax: 01928 794 311

e-mail: consultation.unit@dfes.gsi.gov.uk

Please place an x in the box below that best describes you as a respondent

☐ higher education institutions	☐ university teachers	☐ university administrators
☐ higher education representative bodies	xxxxxxxxx Other (Please specify)	

Please Specify: The Faculty of Public Health is a member of the Academy of Medical Royal Colleges and represents public health specialists in both the university sector and the NHS in the UK

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

Comments:

We feel it is highly undesirable that any of the panels preparing for RAE 2008 should alter their planned mode of working by adopting an enhanced reliance on metrics. This is principally because to do otherwise would potentially bias the planned comparison between the outcome of RAE 2008 and a shadow metrics driven exercise to be conducted in parallel. It is vital in order that sound conclusions are drawn that these two processes do not “contaminate” each other, which would have the undesirable consequence of artificially increasing the apparent correlation between their respective outcomes. In addition it is unreasonable to introduce changes to the proposed panel working arrangements at this relatively late stage in the preparation process for universities

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?

Comments
The proposed metrics at present are highly reliant upon research income, which may be viewed as an important input in the research process. However there is much less detail about the possible use of outputs in metrics driven judgements. One advantage of the current RAE process is that it places most emphasis upon the quality of research outputs in the form of published papers and other media. Closer attention should be paid in the proposals to the quality of outputs. It might be argued that there is a close association between research income and the track record of producing high quality outputs, but this is a relatively long-loop feedback circuit and it is clear that there have been and continue to be highly funded pieces of research whose outputs are widely viewed as disappointing.

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?

Comments:
A general criticism of all the models is that the details are not presented in the consultation document so that is not possible to make a truly considered judgement. As far as one can tell, models C and D seem to have disadvantages both of conserving some of the undesirable attributes of the current funding arrangements and of introducing stepped changes in the funding allocations (one claimed advantage of the 2008 RAE over RAE 2001 is that “cliff edge” effects were removed. Care should be taken not to re-introduce these effects).

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

Comments:

Non-STEM lie outside the area of responsibility of the Faculty of Public Health and therefore further comment is inappropriate.

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

Comments

It is a truism that academics are generally good at gaming and this phenomenon is likely to follow any change to the funding arrangements for research. One possibility is that, in order to increase the research income flow to any given institution there will be a tendency to inflate bids beyond that which is strictly required to undertake the research. Within a fixed pot of funding this will reduce the number of grants awarded and/or increase the administrative effort for research funders in scrutinising research grants closely to try and remove inflated costs. Depending on the hierarchy of esteem attached to different funding bodies there will also be a tendency to increase bidding activity to some bodies (such as Research Councils) whilst reducing the extent of bidding to other bodies. This will have administrative consequences.

In public health we continue to be concerned that the hierarchy of perceived quality of funding sources will value basic laboratory research above the findings from so-called applied research. Although applied research may not have, as its over-riding goal, discovery of new entities or phenomena nor the uncovering of underlying theory, nonetheless it may – as in the case of public health research – be of potentially major significance for the health of populations and hence their economic productivity. We see no clear indications that, despite the emphasis placed upon applied research in the RAE 2008, a metrics based approach will counter these underlying tendencies to implicitly value some knowledge discovery above other forms.

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

Comments
The review acknowledges that the metrics system is unlikely to work across all sizes of institution and on a sub-institution level. What is lacking from the review is any modelling to indicate what is the critical institutional size at which the results of a metrics approach become sufficiently stable to be acceptable. This needs to be explored further before this question can really be answered:

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

Comments:

Over reliance on research income can have the effect of rewarding institutions that have in truth ossified in their approach to research. Funding mechanisms need to be sufficiently flexible to reward innovation and the risk of the system proposed here is that conservatism even greater than in the existing RAE will become ingrained. A review of institutional research plans and strategies may compensate for this tendency by allowing modulation so that innovative strategies are rewarded and – equally – unimaginative strategies are penalised.

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?

Comments:

Many of those considering the metrics proposals outlined in the review have commented that although it will provide a hierarchy of achievement within English HEIs, it will do little to benchmark these institutions against the best in the world. This would suggest that some continuing peer led panel-based review system is needed in parallel with the metrics driven approach to allow this moderation to occur and to ensure that the achievement represented by securing research funds is reflected in the future plans and international cutting edge quality of the work undertaken.

Thank you for taking the time to let us have your views. We do not intend to acknowledge individual responses unless you place an 'X' in the box below.

Please acknowledge this reply x

Here at the Department for Education and Skills we carry out our research on many different topics and consultations. As your views are valuable to us, would it be alright if we were to contact you again from time to time either for research or to send through consultation documents?

xYes ☐No

All UK national public consultations are required to conform to the following standards:

1. Consult widely throughout the process, allowing a minimum of 12 weeks for written consultation at least once during the development of the policy.

2. Be clear about what your proposals are, who may be affected, what questions are being asked and the timescale for responses.

3. Ensure that your consultation is clear, concise and widely accessible.

4. Give feedback regarding the responses received and how the consultation process influenced the policy.

5. Monitor your department's effectiveness at consultation, including through the use of a designated consultation co-ordinator.

6. Ensure your consultation follows better regulation best practice, including carrying out a Regulatory Impact Assessment if appropriate.

Further information on the Code of Practice can be accessed through the Cabinet Office Website: http://www.cabinetoffice.gov.uk/regulation/consultation-guidance/content/introduction/index.asp

Thank you for taking time to respond to this consultation.

Completed questionnaires and other responses should be sent to the address shown below by 13 October 2006

Send by post to: J Cutshall, 1E, Department for Education & Skills, Sanctuary Buildings, Great Smith Street, London SW1P 3BT