

## Russell Group response to the independent review of research bureaucracy call for evidence

### 1. Summary

- 1.1 Research bureaucracy has grown due to a lack of shared understanding of its impact. This has been accompanied by a lack of 'ownership' of the creation of research bureaucracy. There has been no shared drive to regularly review, sunset and otherwise minimise bureaucracy, resulting in a lack of coordination and an excess of duplication at sector level.
- 1.2 The Department for Business, Enterprise and Industrial Strategy (BEIS) could play a leading role in championing a risk-based, proportionate approach to research bureaucracy, encouraging funders and research organisations to take shared responsibility for reducing unnecessary bureaucracy. This will require joint working beyond the lifetime of the independent review and it is recommended BEIS be given responsibility for leading the implementation of the review's findings. The Funders' Forum should be given permanent status in order to support BEIS in this work.
- 1.3 Not all research bureaucracy is bad, but in order to understand what we can reduce and sunset, we need to understand what we have, the purpose it serves and whether it is still necessary. The independent review should consider whether it can conduct a comprehensive mapping exercise of the current research bureaucracy landscape in order to identify inconsistency and duplication. If not, the review should recommend such a mapping exercise to help actors understand its impact and cost at sector level.
- 1.4 It would be helpful if the review could consider the change in the balance of funding between QR (and its equivalents in the devolved nations) and Research Council funding and the impact this has had on increasing administrative costs and on researchers applying for Council grants. Little evidence has been collected on the staff costs associated with preparing failed Research Council bids, obscuring the impact of this burden from funders.
- 1.5 Other specific ideas for how bureaucracy could be reduced include:
  - viewing universities as partners in research; working with and consulting research organisations before the introduction of new requirements or T&Cs
  - working with the sector to establish common standards in compliance in order to reduce duplication
  - more streamlined grants processes and improving digital platforms
  - considering the merits and implications of longer funding periods
  - reviewing the burgeoning landscape for trusted research regulation and VAT.

### 2. Overarching themes

#### A need for shared ownership across the system

- 2.1 Russell Group universities' feedback suggests research bureaucracy has grown due to a lack of shared understanding of its impact on the system's efficiency and a corresponding lack of 'ownership' or responsibility for reducing it, resulting in a lack of coordination and an excess of duplication.
- 2.2 Multiple organisations including government departments, Research Councils and charitable funders are responsible for the creation of research bureaucracy – and individual research-performing organisations (universities, institutes and public sector research establishments)

also add their own layers. This means no single organisation has a strategic overview of the type and volume of research bureaucracy borne by research organisations or the financial impact this bureaucracy has on the UK system as a whole.

- 2.3 It is important to emphasise research burden is not solely the creation of public bodies. The importance of research charity funding means their requirements and conditions are a major factor for researchers to consider, alongside those of the Research Councils, legislative and other requirements. As a result, research charities are effectively acting as quasi-regulators in this space – but this is not always well understood.
- 2.4 As research charities may not recognise their role as quasi-regulators, they may not be considering the principles of good regulation when setting new requirements. These principles include ensuring a risk-based approach to regulation (proportionality), accountability and a commitment to consult those bodies they regulate.
- 2.5 Similarly, government departments beyond BEIS (the main public research funder) can have a significant impact on research bureaucracy. For example, previous National Institute for Health Research (NIHR) requirements triggered widespread engagement with Athena SWAN, and Home Office requirements relating to the use of animals in research have helped ensure UK research establishments address challenges and learn from best practice. But as far as we are aware, there has never been any systematic cross-departmental/agency approach to review and sunset policies that have served their purpose. Other regulatory burdens, such as those created by increased government focus on research security issues, also require better scrutiny to understand their cost and impact in practice.
- 2.6 **BEIS could usefully take a leadership role in this area, working with existing bodies such as the Funders' Forum, to:**
  - promote greater awareness of funders' roles as quasi-regulators
  - link up other government departments and agencies to better understand the impact their policies have on research organisations
  - understand the impact of research bureaucracy
  - encourage funders and others to work with research organisations to audit, monitor and address bureaucracy
  - champion good practice
  - work with stakeholders to sunset policies that have served their purpose.

### **Duplication and a lack of consistency across funders**

- 2.7 Since the impact of additional bureaucracy may be invisible to the organisations which create it, there are few drivers in place for funders to co-ordinate efforts in this area, leading to unnecessary duplication across the system. For example, researchers can be required to enter the same information on a research project into multiple systems on numerous occasions, depending on the frequency of reporting required by different funders.
- 2.8 The Nurse Review called for harmonised processes across UKRI and there has been welcome progress on this front in recent months. However, there are still separate terms and conditions and funding guidelines for each Research Council. This can result in additional burden, particularly for interdisciplinary research projects. **Greater consistency and co-ordination between the Research Councils and across other funders could greatly reduce the burden** associated with applications for funding, outcome reporting requirements, bullying and harassment policies and reporting and collaboration agreements (by creating sector-wide templates).

## A need for a systems-wide mapping and audit of research burden

- 2.9 While research bureaucracy is recognised as a significant burden which diverts funding from research, the drivers of its creation and the impact of its burden are not well understood. This lack of understanding around the impact of research bureaucracy can be a barrier to making progress in reducing it: while research funders can be the creators of bureaucracy, they may also be shielded from the impact of policies which are sub-optimal.
- 2.10 To address this issue, the sector needs a better understanding of the bureaucracy researchers currently contend with. **The independent review could undertake this activity itself or recommend a comprehensive mapping of research bureaucracy be conducted.** This information would be highly useful in helping funders understand and quantify the impact of unnecessary bureaucracy on the system as a whole.

## Shifting burden to other actors within the HE system

- 2.11 The review should also recognise the importance of **ensuring attempts to reduce burden do not result in bureaucracy being shifted to other parts of the system.** For instance, the UKRI Funding Service replacement for the Je-S system should be carefully tested with university research offices to ensure burdens are being reduced rather than transferred.

## Ensuring effective implementation

- 2.12 To tackle research bureaucracy effectively, Government, funders and universities will need to commit to working together beyond the period of this review – identifying and agreeing where processes and reporting can be streamlined will be a complex process which will take time to implement. An action plan for implementation, timelines for delivery and buy-in from multiple funders and research organisations will likely be required. **As the most significant public funder of research, BEIS could play a hugely valuable role co-ordinating this effort across the sector, leading the implementation of the review’s recommendations the review and ensuring stakeholders are able to work together to take shared responsibility for managing and reducing research bureaucracy.**
- 2.13 This work will have the most impact if all major funders are engaged and share ownership of the bureaucracy agenda. The new Funders’ Forum is an excellent opportunity to develop a culture of information sharing, collective working and intelligent regulation. **We would like to see the Funders’ Forum given permanent status and built into plans for implementation of the review’s recommendations.** We would also like to see the Forum work on issues relating to sector-wide standards and duplication. Progress in this space will also be closely tied to wider work on research culture and REF reform, and any implementation plan will need to take this into account.

## 3. What specific changes do you think could bring the biggest reduction in unnecessary research bureaucracy?

### Addressing changes in the balance of funding between QR and Research Council grants

- 3.1 QR funding (and its equivalents in the devolved nations) is a competitive and low bureaucracy source of funding for research. Indeed, the cost of REF 2014 has been estimated to be only around 2.4% of the £10.2bn in QR research funds projected to be distributed between 2015/16 and 2020/21, compared to up to 6% for the Research Councils.<sup>1</sup>

---

<sup>1</sup>Technopolis (2018), [Review of the Research Excellence Framework: Evidence Report](#)

- 3.2 In addition, only 21% of competitive funding bids to UKRI bodies were successful in 2020-21, falling from 24% in 2019-20 and 27% in 2018-19.<sup>2</sup> This means the significant cost (often funded through QR funding) and effort of preparing and bidding for Research Council grants usually results in no return, while also potentially negatively impacting research culture and researcher morale. **A higher share of QR funding in the UK's excellent dual support system would likely reduce burden on both UKRI and researchers.**
- 3.3 The Higher Education and Research Act recognises the importance of the dual support system by providing a legal reference to the balanced funding principle. However, when looking at the relationship between these two arms, the balance of funding between QR and Research Council funding has fallen from 80p in the pound in 2007 to 64p in the pound in 2021/22.<sup>3</sup> This has meant since 2010, QR funding has declined by 17% in real terms at a time when funding for R&D has increased from £9.7bn in 2007 to £14.9bn in 2021.
- 3.4 It would be helpful if the review could consider this change in the balance of funding and the impact it has had on both increasing administrative costs associated with supporting Research Council grants and on researchers applying for Research Council grants. In the Russell Group's recent report on research culture, interviews with researchers suggested the high burden associated with failed Research Council bids was having a negative impact on researcher morale.<sup>4</sup> Research into these costs and their impact on researchers could help Research Councils better understand the impact of the change in the balance of funding over time. This change may also explain why UKRI is finding it increasingly difficult to find peer reviewers, as the amount of work requiring peer review has grown substantially.
- 3.5 We are also conscious that QR increases in England are not always passed on to universities in the devolved nations via their own equivalent funding mechanisms. It is imperative that this be addressed if the UK as a whole is to tackle issues of research sustainability and resilience and remain internationally competitive.

### **Sector-wide standards on assurance and due diligence**

- 3.6 Universities must meet a series of requirements in areas such as bullying and harassment and equality, diversity and inclusion (EDI). This is right and important, but we would like to ensure that these requirements are as consistent as possible – and, indeed, are consistently robust – across funders. It would be useful if BEIS, working with the Funders' Forum, could consider the degree to which policies and practices in these areas could be standardised.
- 3.7 Duplication, and its associated bureaucracy, is particularly conspicuous in outcome reporting, with requirements to enter data on outputs into Researchfish, Research Excellence Framework (REF) impact case studies, and a range of other statutory reports. It is also common in grant applications, where universities must provide material repeatedly – for instance, for some Innovate UK bids, researchers have to submit data in two separate systems via Je-S and apply through the Innovation Funding Service portal. **We hope this will be addressed as part of the work to create new simplified grant application processes.**
- 3.8 To this end, it **would be helpful if BEIS could work with the sector to establish common standards in compliance and security-related areas of research management** in order to work as a sector to manage sector-wide risks. This would help avoid unequal burdens, and any associated 'weak spots' from a security perspective, without creating fresh waves of unnecessary bureaucracy. This might include shared processes for due diligence instead of

<sup>2</sup> UKRI (2021), [Annual Report 2020-21](#)

<sup>3</sup> BEIS (2021), [R&D budget allocations 2021/22](#), footnote 16

<sup>4</sup> Russell Group (2021), [Realising Our Potential: Backing Talent and Strengthening UK Research Culture and Environment](#)

universities duplicating effort. For example, a known entity list, as in the US and Australia, would be helpful, ensuring UK researchers are not put at a disadvantage with competitors and collaborators overseas.

### Viewing research organisations as partners in research

- 3.9 There are a number of examples where unclear guidance or poor-quality regulation has led to unnecessary bureaucracy, or the back-tracking of new guidance and terms and conditions. The painful process of amending new regulation could be avoided if **funders could work with universities as partners and co-regulators** in research and if a shared understanding of the desired outcomes to be achieved could be agreed upfront. In this way, different approaches might be considered that would achieve the same aims in a more effective and/or less burdensome way. Consultation before the introduction of new requirements could help funders iron-out practical implementation issues before difficulties arise.

### Proportionality

- 3.10 Funders could be encouraged to apply a **principle of proportionality** to funding calls, whereby the work required to apply for funding is aligned to the level of funding on offer. This would complement commitments to minimise duplication and to align processes between funders, ensuring a focus on essential requirements.
- 3.11 More widely, **a risk-based approach to regulation** across funders would help to eliminate unnecessary bureaucracy. For example, financial audit processes used by many funders often treat low-value transactions (such as £20) in the same way as high-value transactions worth over £10,000. This results in significant expenditures of time and effort in ensuring the eligibility of each purchase. The benefit for funders is negligible, and compliance teams within universities have to increase resourcing to check every single transaction.

### Improving digital platforms and systems

- 3.12 Data systems – and specifically the introduction of data systems able to engage with each other and/or harvest data from publicly available information which already exists – are a key means of reducing bureaucratic burden. **Ensuring, as far as possible, that online data collection can be automated for any output recording system** (eg ResearchFish or any replacement) would have significant benefits in terms of reducing the need for minor entries.
- 3.13 The planned replacement for Je-S is a welcome opportunity to streamline processes and reduce overheads. **If the new system can support integration and be interoperable with commonly used grant management solutions such as Worktribe**, this would eliminate a significant amount of administration and reduce errors from re-keying data.

### Streamlined grants processes

- 3.14 More generally, **grants processes could be streamlined**, striking a sensible balance between a strong competitive process and eliminating the inefficiency of preparing and assessing too many failed proposals. The funding bodies cannot cope with current volumes: UKRI's difficulties in finding peer reviewers are a symptom of the wider problem. We recognise this issue is already being addressed in part by UKRI's Simpler and Better Funding review, which is welcome.
- 3.15 The Independent Review might also **consider the merits of more agile models of peer review**. The European Research Council's proof of concept calls, for instance, have relatively short applications, with reviewers scoring only specific aspects of proposals. Scoring is largely numerical, and the ability to discriminate between proposals comes from

taking scores from a relatively large number of reviewers (the burden on each one being greatly reduced). We take no fixed view here, but would welcome conversations with researchers and funders to understand the potential advantages and disadvantages.

### Considering the impact of introducing longer funding periods

- 3.16 The review could usefully **consider the merits of introducing or piloting the use of longer funding periods for Research Council grants**. Funders such as Wellcome for example have moved to provide longer funding periods as the norm.<sup>5</sup> A three-to-five- or five-to-seven-year norm could give researchers more space to focus on their research and reduce pressure to return potentially suboptimal results, or to structure their research in ways which might not work as well, due to relatively tight timescales. For some, it could afford them space to build more ambitious proposals, with potentially greater impact. The Government has rightly recognised the importance of high-risk, high-reward research in the context of ARIA: allowing researchers more scope for bigger projects would align with this.
- 3.17 There would be trade-offs in doing this within a fixed budget envelope. If funders lengthen grants, they may be able to fund fewer of them. Shorter grants and posts can also be a useful stepping-stone for postdoctoral researchers and other staff looking to build up experience. Fewer, longer awards might also have unintended EDI consequences. Given the Government's commitment to increase funding to £22bn by 2024/25, however, it could be possible to increase both their length and their number.
- 3.18 Further discussion with funders would assist in understanding the implications of longer funding periods. To provide accountability for longer grants, funders could consider greater use of a two-stage funding system, with a light-touch review process partway through to ensure projects are meeting expectations before confirming further funding. A helpful model is the UKRI Future Leaders Fellowships, which provide funding for four years with the option to extend for a further three years 'to support long-term focus on a particular area of research or innovation and continued career development'. **We would welcome a full discussion on longer-period grants, making use of the collective expertise within the Funders' Forum.**

### Trusted research

- 3.19 The regulatory environment for trusted research has grown in complexity over the last twelve months. A selection of new guidance, legislation and new systems of oversight has been put into place. As different parts of government have been responsible for these different measures, there would be benefit in the review taking a strategic overview of the new system, in order to ensure new guidance and legislation compliments each other, rather than acting as a disincentive to conducting R&D. New developments include:
- new guidance on export control legislation for research organisations<sup>6</sup>
  - the National Security and Investment Act and related guidance for HE organisations<sup>7</sup>
  - guidance from the Centre for the Protection of National Infrastructure, created in consultation with the HE sector, on Trusted Research<sup>8</sup>
  - new requirements from UKRI on UK Research and Innovation Trusted Research Principles<sup>9</sup>

<sup>5</sup> Wellcome, '[How our funding schemes are changing](#)' (accessed 1 October 2021)

<sup>6</sup> Department for International Trade and Export Control and Joint Unit (2021), '[Export controls applying to academic research](#)'

<sup>7</sup> BEIS (2021), '[National Security and Investment Act: guidance for the higher education and research-intensive sectors](#)'

<sup>8</sup> Centre for the Protection of National Infrastructure (2020), '[Trusted Research Guidance for Academia](#)'

<sup>9</sup> UKRI (2021), '[Trusted Research and Innovation Principles](#)'

- Universities UK's 'Managing risks in Internationalisation: Security related issues' guidance.<sup>10</sup>

## Other issues

### 3.20 It would be useful if the review could examine issues relating to VAT and research.

This is a highly bureaucratic area, often due to a lack of clarity regarding where VAT charges should be applied. The point at which universities should charge each other VAT when undertaking collaborative research for example is not always clear, while VAT complexity has also acted as a bar to universities sharing equipment. The rules surrounding what costs can be zero-rated as part of a research project are also inconsistent: for instance, refrigeration equipment is treated as eligible for VAT relief, while sterilising solutions are not. In addition, qualifying items must predominantly be for use in medical or veterinary research, ignoring the national benefit derived from research related to issues such as climate change. The British Universities Finance Directors Group (BUFDG) could be a useful source of information on this issue and the review may wish to consult them further on how bureaucracy can be reduced in this area.

### 3.21 The review could helpfully consider the impact of requirements for match funding of research grants on overall levels of burden. Tracking and recording match funding, and ensuring its eligibility, adds considerably to research bureaucracy and can increase the risk of a post-completion audit identifying ineligible costs due to technicalities. These requirements may skew the competitive landscape, excluding some organisations who may be best placed to deliver the most relevant research and support the most valuable innovation.

### 3.22 The amount of time made available for calls can be an additional barrier to researchers. It also risks reducing the scope of applications which can be submitted, damaging the prospects of more innovative and less 'shovel-ready' projects, while making it harder to allocate available funds. Industrial Strategy Challenge Fund (ISCF) grants are a good example of some of the challenges: the National Audit Office (NAO), pointing to a 14% underspend in 2019-20, reported that 'delays in getting new challenges approved and up and running was having a knock-on impact on UKRI's ability to spend against the monies allocated for the new challenges and that the underspend had increased between Waves 2 and 3.' The NAO noted that it took UKRI, BEIS and HMT 72 weeks to move from identifying the challenges to the approval of those challenges in Wave 3.<sup>11</sup>

### 3.23 The distinction between rigour in assessing research bids and how prescriptive the conditions are for using funds once awarded would benefit from further consideration. For instance, some funders will not permit laboratory consumables – bottles or petri dishes, for example – to be covered by grants, however relevant they are to the research. **The Review may wish to consider the experience of overseas jurisdictions which, while rigorous in deciding who should be funded, tend to afford greater freedom to researchers once the initial decision has been made.**

October 2021

<sup>10</sup> Universities UK (2020), [Managing risks in Internationalisation: Security related issues](#)

<sup>11</sup> National Audit Office (2021), [UK Research and Innovation's management of the Industrial Strategy Challenge Fund](#)