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Acadamh Ríoga na hÉireann
Royal Irish Academy

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A response from the Celtic Academies Alliance to the Independent Review of Research Bureaucracy

Summary

The information sought during the research grant application process should be no more than necessary to enable the research funder to make an objective assessment on the merit of the application.

The level of application bureaucracy and oversight required should be commensurate with the level of risk and funding available.

The review should consider whether a staged approach to research funding applications can be deployed more extensively in order to minimise demands on researchers and reviewers, and to expedite decision making. There are existing examples which can be considered and rolled-out more widely. A one-step process could be used for small grants while a staged process would be a reasonable expectation for large strategic and collaborative grants.

All stages of the review process must involve reviewers with relevant expertise and experience in the research area. The review should consider whether the status and value of peer review can be enhanced to increase the number of reviewers and the timeliness of reviews. It should also explore the payment of reviewers, and whether there is an opportunity to pilot and test an approach where peer reviewers are paid.

Once live, research funding processes and application forms should not be changed unless absolutely necessary.

Decision-making timelines should be streamlined to provide certainty to those involved in the process and to minimise delay. Where there is a commitment to, and expectation of, a fast turnaround on research funding decision making, government and research funders need to deliver that.

Consideration should be given to having a time limitation on when an applicant can next apply to the same research funder following an unsuccessful bid in order to restrict applicants re-submitting unsuccessful bids and burdening the review system. There are existing examples of application limitations being applied that can be rolled-out more routinely.

There is a need for better coordination and signposting of research funding opportunities to help address the complexity of the UK's research funding landscape.

Universities need to review their internal processes to ensure that they do not add unnecessary bureaucracy to already complex processes of application, review and post-award administration.

The quantum of research funding must remain at a level where it meets the rising costs of undertaking research.

Introduction

1 The Celtic Academies Alliance welcomes the opportunity to respond to the call for evidence from the Independent Review of Research Bureaucracy.[1] This response draws on the views and experiences of a group of multidisciplinary mid and senior career researchers from Scotland, Wales and Northern Ireland, convened through the Celtic Academies Alliance. It builds on the ongoing engagement which the Alliance has had with the Department for Business, Energy and Industrial Strategy (BEIS) and with UK Research and Innovation (UKRI) on the UK R&D Roadmap and the Future Research Assessment Programme. We would be pleased to discuss further our response with the independent review team.

2 The review is timely. It provides an opportunity to ensure that the research application and review process operates as efficiently and effectively as possible. The Alliance supports the use of proportionate and robust processes to safeguard the use of public funds and to support high quality research. It is crucial to develop a culture of trust across all parts of the system, including government, funders, universities and individual researchers. This would mean that all those involved understand how their requirements and actions have an impact on others in the system and would help to ensure that levels of bureaucracy and oversight are proportionate to need. We address these points in more detail in response to the consultation questions.

What are the main sources of unnecessary bureaucracy that need to be taken into account by the independent review?

Research Funding application process

3 **The information sought during the research grant application process should be no more than necessary to enable the research funder to make an objective assessment on the merit of the application. Application forms should not require the applicant to input repetitive information.** More detailed information which is immaterial to assessing the merits of the application, including that relating to detailed budgets and data management plans should be kept to the post-award stage. Requiring applicants to provide from the outset detail which can be considered supplementary to the application is labour intensive in a climate where the average rejection rate for UKRI applications is 80%.[2]

4 **Once a funding call is issued, the application form or process should not be changed unless absolutely necessary.** We are aware of a recent call where the application form was changed by the funding body once issued resulting in additional work and uncertainty for the applicant.[3]

5 **It would be instructive if the independent review were to review a sample of research fund application forms in order to provide advice to the sector on the nature of the content and on the level of detail required.** This would help ensure that only the information required to assess an application is sought.

6 Many research projects involve collaborative partners, including industry, who are often required to submit supporting statements. **Consideration needs to be given to streamlined processes that would minimise resource demands on them** so that unnecessary bureaucracy does not result in the disenfranchisement of external partners.

Implementing a staged approach

7 **The review should consider whether a staged approach to research funding applications can be deployed more extensively.** Under such an approach, the first stage would require the applicant to make a succinct application which would be independently peer reviewed and an assessment made as to whether the proposal meets the threshold for the applicant to be invited to submit a stage two detailed grant application. Stage one should be as simple and concise as far as possible to minimise demands on reviewers and researchers. Sufficient detail would allow reviewers to assess the project fit and collaboration suitability. While a light touch first stage might result in a greater number of applications than an extensive, single stage application process, stage one proposals in a two-stage system could be reviewed quickly.

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1 The Celtic Academies Alliance brings together the Royal Society of Edinburgh, Learned Society of Wales and the Royal Irish Academy, the national academies for Scotland, Wales and the island of Ireland. More information about the Celtic Academies Alliance is available at: https://www.rse.org.uk/launch-celtic-academies-alliance/

2 UKRI competitive funding decisions in 2020-21
https://www.ukri.org/about-us/what-we-do/funding-data/decisions-on-competitive-funding/2020-21-data/

3 See, for instance, the recent AHRC-DFG 2nd joint call (2019/20). The AHRC required the impact summary (as a separate section on Je-S) and the impact workplan as part of the case for support within the proposal at the opening of the call in November 2019. However, this requirement was discontinued at the time of the closure of the call in February 2020, meaning that the impact component of the applications were not assessed by the reviewers, thereby disadvantaging those applicants who had invested time and effort to include material on impact as part of their applications.

8   Staged approaches to research applications already exist. The Leverhulme Trust Research Project Grants are assessed using a two-stage approach involving expert review panels.[4] The Engineering and Physical Sciences Research Council (EPSRC) Programme Grant applications involve an initial 2-page pre-outline and a 4-page outline stage, before applicants are invited to submit a full proposal.[5] These approaches help to minimise the amount of information that applicants need to provide at the pre-proposal stage: only those who are invited to submit a full proposal need complete a full application. A two-stage process could help reduce anxiety among researchers on applications since they should expect to receive an initial determination relatively quickly. It could also help improve relations between academic and industry partnerships, where industry is likely to desire quicker turn-around on decisions.

9   **The demands of the application process should be commensurate with the level of funding available.** A more detailed application process should be used for larger grants; a proportionately light touch process for relatively smaller grants. **It might be sufficient to have a one-step process for small grants while a staged process would be a reasonable expectation for large strategic and collaborative grants.**

Peer review

10   **All stages of the review process must involve reviewers with relevant expertise and experience in the research area.**

11   **Anonymous peer reviewers are essential to the quality and integrity of the research funding system.** The colleges of peer reviewers broadly represent the diverse spread of knowledge and expertise within the research communities they serve. The peer review process works on the basis of trust, reciprocity, and a shared commitment to the advancement of knowledge, with reviewers expected to give freely of their time to review extensive research applications. Given the demanding nature of the role and the frequency of requests, it can be a challenge to identify sufficient peer reviewers to review a proposal. This can lead to bottlenecks in the research assessment and determination process.

The review should consider the peer review process, including whether the status and value of peer review can be enhanced to increase the number of reviewers and the timeliness of reviews. The review should also consider ways in which the rigour of peer review can be enhanced, including reducing any reviewer bias. This could include, for example, anonymising the application to help ensure the proposal is assessed only on its merits.

12   Peer reviewers are not normally paid for their work. There has been discussion about the potential of paying peer reviewers for the service they provide. This remains a contested topic and it is not clear where the burden of payment would fall and how it would impact on the funding available for research. **The review should consider the payment of reviewers, and perhaps pilot and test an approach where peer reviewers are paid.** There is an opportunity to look at alternative models from elsewhere. For example, the Swedish Research Council does pay its peer reviewers.

Decision-making timelines

13   **Decision-making timelines should be streamlined to provide certainty to those involved in the process and should aim to minimise delay.** A long delay between application and decision presents uncertainty for the researcher, for collaborators and can hinder the uptake of research.

14   **Consideration should be given to having a time limitation on when an applicant can next apply to the same research funder following an unsuccessful bid.** This should restrict applicants re-submitting unsuccessful bids and burdening the review system with applications which have previously been considered un-fundable. For example, the European Research Council has restricted the number of proposals that can be submitted by applicants who are repeatedly unsuccessful in order to minimise the number of uncompetitive proposals and to manage the demand on reviewers.

4   https://www.leverhulme.ac.uk/research-project-grants
5   https://www.ukri.org/councils/epsrc/guidance-for-applicants/types-of-funding-we-offer/programme-grants/how-to-apply/

15 The UK research landscape is complex with a wide range of research funding bodies. While not an exhaustive list, research funding in the UK is available through a wide-range of sources, including: that funded directly by government departments; UKRI and its own programmes including Strength in Places, the Industrial Challenge Funds, Global Challenges Research Fund, and the Strategic Priorities Fund; UKRI research councils; Innovate UK; the catapult network; the research councils and funding bodies in the devolved nations; research charities and trusts; and the national academies. This can present challenges for researchers to navigate, particularly early career researchers and potential external collaborators including business. **The review should consider whether there are ways in which the complexity of the landscape can be addressed through greater coordination and signposting of research funding opportunities.**

16 **It will be important that the quantum of research funding remains at a level where it meets the rising costs of undertaking research.** Should this not be the case, aspects of research may become unviable and/or researchers will need to apply more frequently.

What specific changes do you think could bring the biggest reduction in unnecessary bureaucracy?

Simplifying, aligning and integrating processes and requirements from funders

17 In our responses to the previous question, we have set out several ways in which the research funding process could be simplified. This includes:

- **Streamlining the application process** so that it requires no more information or detail from the applicant than that required to enable an objective assessment of the proposal to be made. This includes holding-over requests for more detailed and supplementary information including data management plans, detailed budgets and impact assessments to the post-award process and ensuring that the application process does not ask for redundant information and/or requires an applicant to duplicate information.

- **Making greater use of a multi-staged application process**, particularly for larger grants with a view to increasing the efficiency of the system.

- **Placing time limitations on when an unsuccessful applicant can next apply** to the same research funder following an unsuccessful bid. Unsuccessful applicants should be provided with sufficient feedback to aid higher quality and more relevant resubmissions.

- **Better coordination and signposting of research funding opportunities** to help address the complexity of the UK's research landscape.

Funders acting proportionately with the size of awards

18 **We firmly believe that the level of application bureaucracy and oversight required should be commensurate with the level of risk and funding available, and that a staged approach should be considered for larger grants.**

Greater flexibility and agility in the funding system

19 The response to the Covid-19 pandemic has demonstrated the agility within the research system to bring forward a range of research funding to support pandemic-related research. While government funding was made available quickly, we are aware of concerns that the responsiveness thereafter to review and select funding applications was slower than anticipated, thereby potentially hindering progress in developing interventions.[6]

20 **Where there is a commitment and expectation for a fast turnaround on decision making, it is important that government and research funders are able to deliver on that.** The independent review should help ensure that in future processes operate as effectively and timely as possible.

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6 See, for example, the RSE response to the House of Commons Science and Technology Committee's Inquiry into *UK Science, Research and Technology Capability and Influence in Global Disease Outbreaks*; August 2020 https://www.rse.org.uk/wp-content/uploads/2020/09/AP20-12.pdf

21 In early 2021, the Royal Society of Edinburgh (RSE) launched its Research 'Re-Boot' (Covid-19) research grants to support academics who had experienced reduced capacity to carry out research and/or to submit research proposals due to the impact of Covid-19.[7] The RSE kept the application process light touch, including an online application form, assessors from within the RSE Fellowship, kept the grants to a maximum of £15k per application and gave priority to early career researchers. This approach helped ensure the rapid assessment of grants, encouraged applications from across the sector, and was seen as a welcome stimulus. The RSE would be pleased to share its learning from this process with the review team as well as looking at ways we can continue to improve our approaches to grant funding.

Addressing bureaucracy within individual institutions

22 **Universities need to review their internal processes to ensure that they do not add unnecessary bureaucracy to already complex processes of application, review and post-award administration. Any moves to a more proportionate approach on the part of research funders needs to be accompanied by proportionality within universities' auditing and review processes.** As part of this, universities need to review their procurement rules so that they do not result in unnecessary bureaucracy. In addition, long-standing issues related to the value, ownership and use of intellectual property (IP) arising from the research can act as a barrier, especially for inter-institutional research, and can delay the research process. **The review should consider whether common frameworks or templates can be developed for research collaboration and partnership agreement.**

Improving digital platforms and systems

23 **There is scope to improve online application portals to streamline the application process.** There is existing good practice in the UK that can be considered and implemented more widely, including, for example, the EPSRC SmartSurvey that enables users to complete webforms. Consideration should be given to rolling out use of the SmartSurvey across the UKRI research councils. The review should consider whether a single, joined-up portal could be used to document the impact of research grants as opposed to the current situation where researchers need to enter the same information on different systems including Researchfish[8] and universities' internal REF systems.

24 **The review should consider the best practice elements of systems and approaches outwith the UK.** For example, the Australian Research Management System, developed by the Australian Research Council in partnership with the Australian research community, is a web-based system used by multiple agencies to manage the research grant process, including submission, assessment and acceptance. The system is also used to support post-award activities and reporting.[9]

What would make the greatest difference to the application process?

25 **It is crucial that the application process requires no more information and detail than that required to objectively assess the quality of the proposal.** We recognise that the type and level of information required will differ from one research funder/scheme to another. The review panels for each funding scheme would be well placed to advise on what information is critical to the assessment process, what should no longer be sought and what can be held over to the post-award process. **Ensuring that internal university research management and auditing processes are proportionate to the level of risk and funding is important. The comments made on the peer review system** are also pertinent here.

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7 https://www.rse.org.uk/awards/research-re-boot-covid-19-impact-research-grants/

8 https://researchfish.com/

9 https://www.arc.gov.au/grants/rms-information

What could address the current issues with post-award assurance processes?

26 **In relation to data management, the research funder should make clear the level of data compliance required rather than leaving this to the interpretation of the researcher or their institution.** It should be recognised that some research data of a personal or ethically sensitive nature cannot be shared or made available via a public repository. It is therefore important that data sensitivity distinctions are recognised in post-award processes and do not require the researcher to spend disproportionate amounts of time in their justification.

27 **Consideration needs to be given to straightforward procurement rules.** Complex procurement processes can increase bureaucracy particularly in research consortia where a collaborative partner may have been specifically identified and brought into a bid on the basis of a service that they can provide, but where procurement rules mean that an open tender is required.

28 The review should also consider whether a differential in overheads and estate costs across research institutions in the UK has a detrimental effect on cross-institutional collaboration. The review could consider whether a standardised rate for overheads could be introduced across the whole of the UK.

29 It is important that staff overseeing the operation of research funding programmes and those supporting internal university research processes have the expertise and skills required. These research management and support staff should be supported to access ongoing professional development to enable them to fulfil their roles and meet the needs of a dynamic research system.

Would you like to add any evidence and examples of best practice in removing or preventing unnecessary research bureaucracy?

30 In addition to the examples of good practice we have provided elsewhere in this response, we would draw attention to the **Alexander von Humboldt Foundation fellowships** which generally require a short research outline, CV and a list of publications. We have already highlighted RSE research awards' programmes, and the review should consider research programmes offered by the other national academies, including the Royal Society's Research Fellowships.

Additional Information

For more information contact:

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