

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.

department for

education and skills

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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.

Name

Organisation (if applicable) Royal College of Nursing

Address: 20 Cavendish Square
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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

Other (Please specify)

Please Specify: Professional Organisation

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

Comments:

Science, Technology, Engineering and Mathematics are possible panels. The draft document points out the difficulties in using metrics to assess research quality / assign funding in medicine given the large proportion of charitable funding awarded to medicine (90% according to point 5.6), as this approach may lead to 'positive feedback' where medicine receives increasing proportions of health related funding due to its initial high funding capture. This may lead to relative overinvestment in some areas of health research over others.

One concern is the unintended effect of using different methods of assessment across different disciplines, particularly when these might straddle the conventional divide of 'medicine' and non-medicine, for example nursing and other health professions. This could lead to unintended effects of health researchers being considered as contributing to medicine when they are successful at attracting Research Council grants, and to be contributing to discipline specific areas when not. This has the potential to undermine the emerging research capacity in the health professions.

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:

Input metrics such as funds awarded potentially serve to reward grant income without considering output, impact or quality. As such it could perversely reward expensive research with little useful output of high quality. Given this potential anomaly, it should be dropped as a metric.

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:

There are important limitations with each of the five models proposed and we do not think that any of them, as they stand, are acceptable. As they appear to correlate well with current QR funding only in larger institutions, then these model should not be considered as fit for purpose, as the variation in assessments with the smaller institutions indicate they are not a valid replacement for the current mixed methods approach of using metrics and peer review.

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

Comments:

The proposal in Annex two, for the non-STEM subjects has some merit, but the list of metrics includes some items deemed to be undesirable (e.g. input metrics, and bibliometrics) are problematic. We feel that peer review with an international contribution is the key to establishing a benchmark for research quality in the UK.

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

Comments:

Using a model including Research Council application success rates may have the unintended consequence of discouraging new and emerging disciplines from applying for these funds, therefore leading to a further 'positive feedback' mechanism where funds are awarded to well established groups with a track record, thus making capacity building more difficult.

Using a model where bibliometrics are used may lead to publication in journals for their impact on this metric rather than on the profession. It may also lead to game-playing at department level with respect to authorship and potentially slow down the advances over the past decade in attributing academic publications to an appropriate body of contributors. As health professionals may work in a team of researchers with different discipline backgrounds, some of whom have greater power in the research arena due to their professional background, then the allocation of authorship may fail to reflect the contribution of health professionals to research.

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

Comments:

No – small institutions are not well served by the systems proposed.

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

Comments:

Yes. This will be a useful confirmation of the perceived strength of individual departments.

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:

It is very important that research quality is assessed by peer review, as this is the measure by which researchers continually are gauged (in applying for funding, publication etc) and inclusion of this within the research quality exercise allows us to determine a benchmark against other countries.

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

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?

Yes

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

Send by e-mail to: rae.consultation@dfes.gsi.gov.uk