

Independent Review of Research Bureaucracy

Final Report Annex C:
Call for Evidence Responses



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Introduction

This annex provides an overview of the responses to the Review’s Call for Evidence that ran from 23 August 2021 to 1 October 2021. It does not represent the full evidence base for the review. The review also benefited from extensive engagement across the sector and across the UK to gather evidence and develop the final recommendations presented in the main report.

The annex is in two parts:

- i. the first is a summary of findings that analyses and quantifies the responses; and
- ii. the second provides a summary of the written comments submitted.

Generalisability

The results in this paper are only representative of those who completed the survey, and we do not have an overall population to compare response with, so we cannot quantify whether non-responders would share these views or generate different perspectives.

This means views on bureaucracy cannot be taken to represent all individuals and organisations within the UK research system. For this reason, and given the sample size, statistical significance testing has not been used to analyse the results. Where possible, differences between groups have been identified. We do not have an overall population for research bureaucracy to compare this sample to the wider researcher landscape. Data on university researchers exists, but not all of this sample consists of individuals responding from universities, and because of the small sample sizes in this call for evidence, we have chosen not to compare diversity between this sample and the HESA dataset.

Summary of findings – Questions 12-15

The Call for Evidence was launched to seek views on ways to substantially reduce research bureaucracy, primarily for the benefit of individuals and teams conducting research.

This summary analyses the responses to the following questions:

Question 12: what are the main sources of unnecessary bureaucracy that need to be taken into account by the independent review?

Question 13: what specific changes do you think could bring the biggest reduction in unnecessary bureaucracy?

Question 14: which of the following would make the greatest difference to the application process?

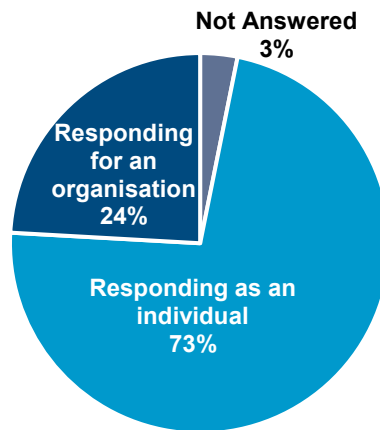
Question 15: which of the following could address the current issues with post-award assurance processes?

Respondents could select more than one response from a list in response to these.

Summary of responses received to preliminary questions – by number, location, organisation type, and diversity of respondents

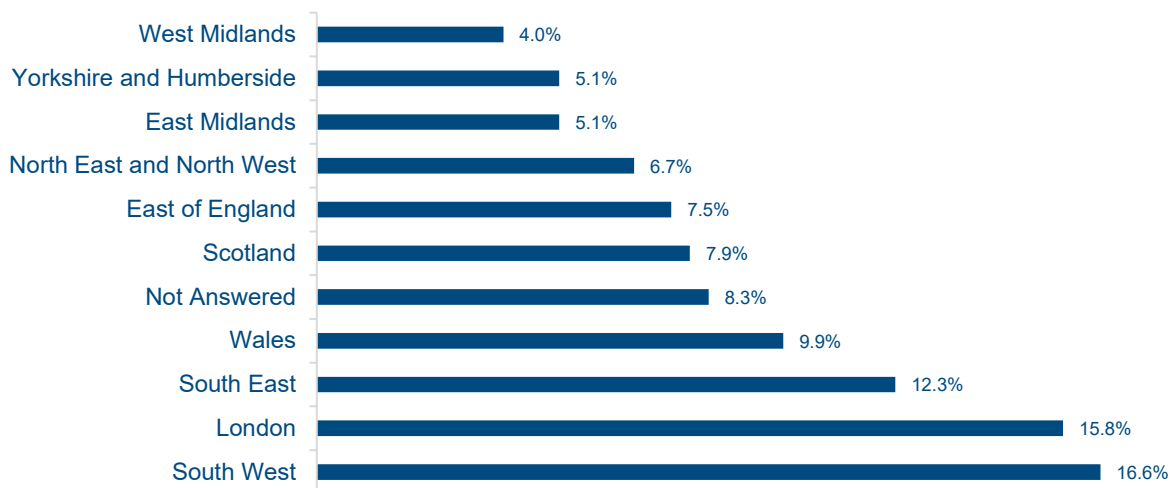
In total 253 responses were received between August 2021 and October 2021. Figure 1. shows that most responses were from those responding as individuals (184 individuals) and just under 25% were from organisations (61 organisations). A small number of respondents did not select whether they were responding as an individual or for an organisation. Where it was possible to identify if it was an individual-level or organisation-level response, those who did not answer were assigned accordingly.

Figure 1. Breakdown of responses received (N=253)



For 20 organisations, an organisational response was received as well as responses from individuals within them.

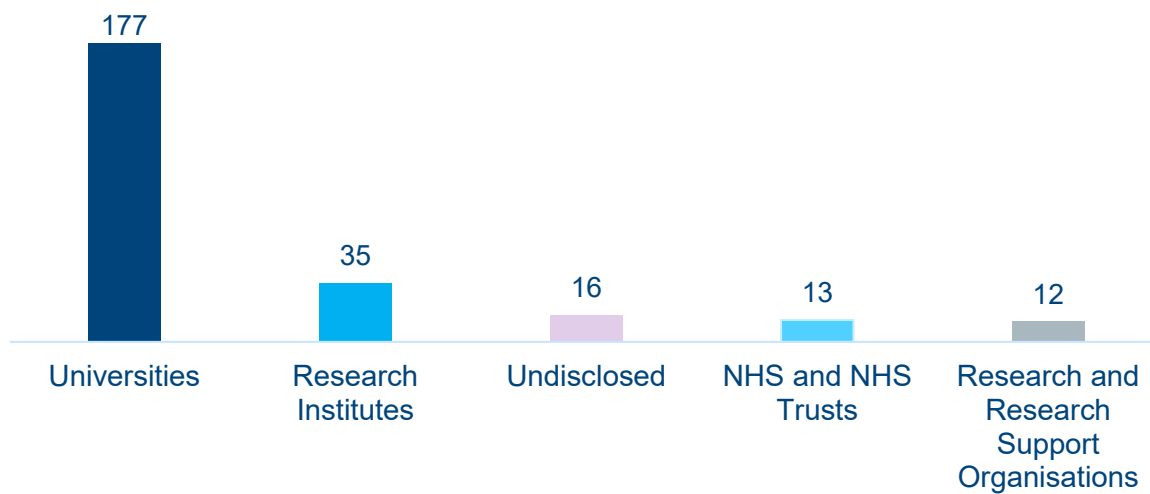
Figure 2. Nation or region of England the individual or organisation is based in (N=253)



Note: The proportion of respondents answering ‘Other’ to this question are not displayed given low counts. North East and North West have also been combined due to low counts.

Figure 2. displays the regional breakdown of the responses received showing that almost half of all responses to the call for evidence were from individuals or organisations based in London, the South East and the South West. Nearly 70% of responses from individuals and organisations were from universities (see Figure 3.), with just over half (32 responses) of organisational responses coming from universities.

Figure 3. Breakdown of individual and organisation responses by organisation type



Of the individuals responding, 50% identified as male and 43% as female. A small proportion identified as non-binary, did not answer or preferred not to disclose.

Around 80% of those who responded as individuals identified as White and just under 7% did not provide an answer to this question. The remaining respondents identified as Asian or Asian British, mixed or multiple ethnic groups, Black, Black British, or African or other ethnic group. Breakdowns have not been provided given the low counts of respondents across these groups.

Nearly 60% (105 individuals) of responses received from individuals were from ‘Researchers’ working within universities. Fewer responses were received from ‘Senior University Leadership (Academic)’ roles across all organisations, excluding those who did not disclose their organisation type.

The full list of questions and the responses that individuals and organisations were able to choose from can be found here: <https://www.gov.uk/government/consultations/independent-review-of-research-bureaucracy/independent-review-of-research-bureaucracy-call-for-evidence-document>. Responses where respondents were able to specify other options in free text will not be covered in this paper.

Question 12: what are the main sources of unnecessary bureaucracy that need to be taken into account by the independent review?

Respondents were asked to identify what they thought were the main sources of unnecessary bureaucracy that need to be considered by the review. They were able to select all sources that they thought applied.

Figure 4. Main sources of unnecessary bureaucracy identified by respondents



Most individuals responding (74%) selected ‘Institutional Research Bureaucracy’ as a main source. This was identified by just under half of organisational responses (49%).

‘Applying for Funding’ was one of the most selected sources amongst both individuals and organisations, 66% and 89% respectively. A high proportion of organisations that responded also selected ‘Reporting and Monitoring’ and ‘Digital platforms for the application, management and outcome reporting of awards’ as additional main sources.

There was most variation between individual and organisational responses selecting ‘Communications with Funders’, 43% of organisations compared with only 14% of individuals.

Question 13: what specific changes do you think could bring the biggest reduction in unnecessary bureaucracy?

Respondents were asked about which changes they think could bring the biggest reduction in unnecessary research bureaucracy. Similarly, respondents were able to select all that applied which should be taken into account when considering the findings.

Figure 5. Specific changes to reduce bureaucracy identified by respondents

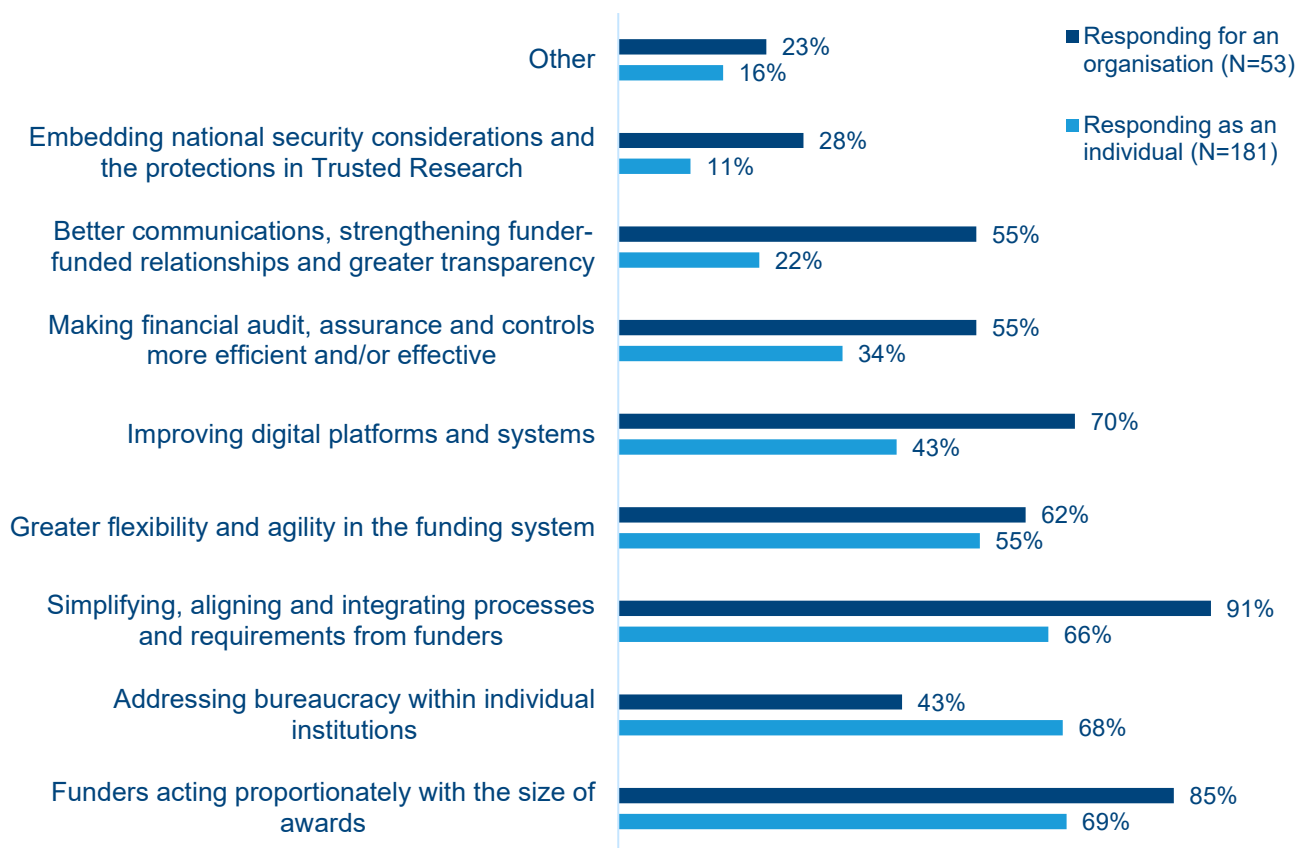
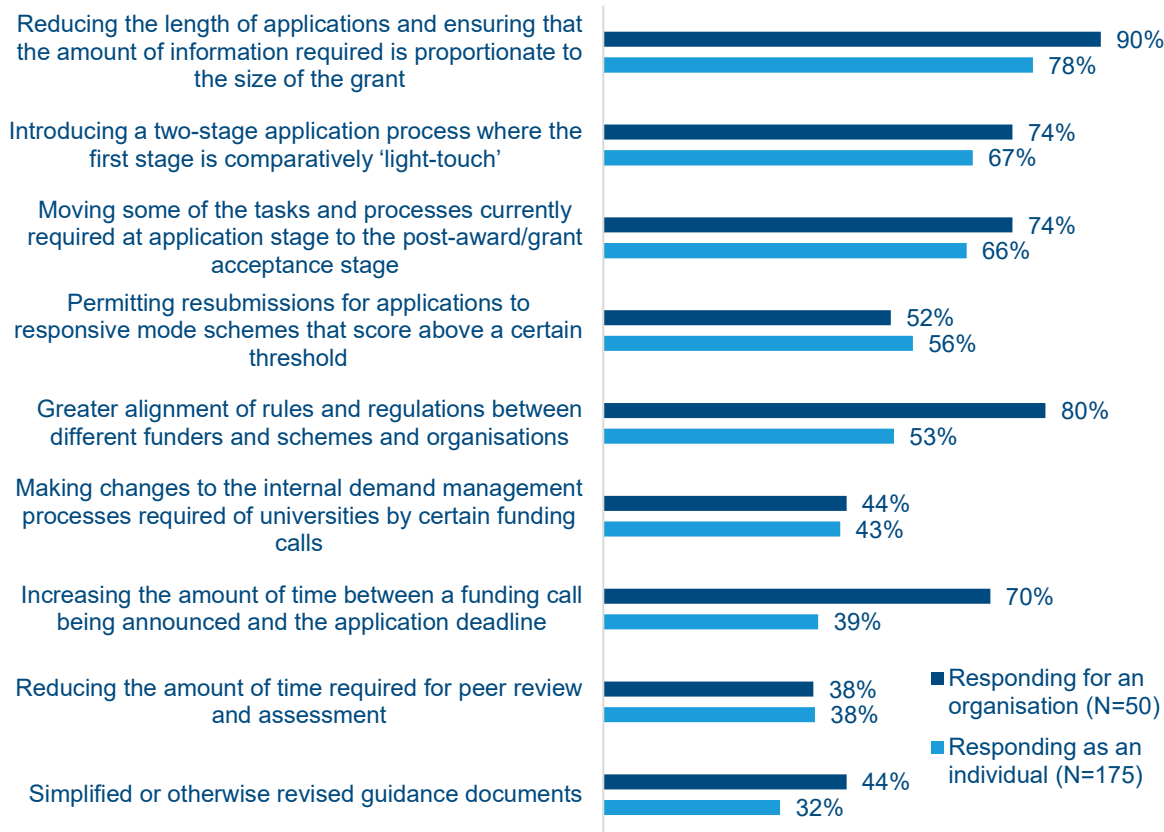


Figure 5. shows that ‘Simplifying, aligning and integrating processes and requirements from funders’ and ‘Funders acting proportionately with the size of awards’ were both selected by the majority of organisations that responded (91% and 85% respectively). Nearly 70% of individuals responding also selected these two changes, with a similar proportion of individuals also selecting ‘Addressing bureaucracy within individual institutions’. However, only 43% of organisations recognised ‘Addressing bureaucracy within individual institutions’ as a change that could reduce bureaucracy. ‘Improving digital platforms and systems’ was additionally selected by a high proportion (70%) of organisations.

Question 14: which of the following would make the greatest difference to the application process?

More specifically, respondents were asked about changes that could make the greatest difference to reducing unnecessary bureaucracy in the funding application process. Respondents could also select all that applied for this question.

Figure 6. Overall responses on what would make the greatest difference to the application process



Note: The proportion of respondents answering 'Other' to this question are not displayed given low counts.

Figure 6. demonstrates broad agreement across responses to this question between organisation-level and individual-level responses. The most selected changes to make the greatest difference to the funding application process were:

- Reducing the length of applications and ensuring that the amount of information required is proportionate to the size of the grant;
- Introducing two-stage application processes where the first stage is comparatively light touch; and
- Moving some of the tasks and processes currently required at the application stage to the post award/grant acceptance stage.

The most marked difference between organisation-level and individual-level responses is around ‘Increasing the amount of time between a funding call being announced and the application deadline’ 70% of organisation responses identified this compared to 39% of individual responses.

80% of organisations also called for ‘Greater alignment of rules and regulations between different funders and schemes and organisations’.

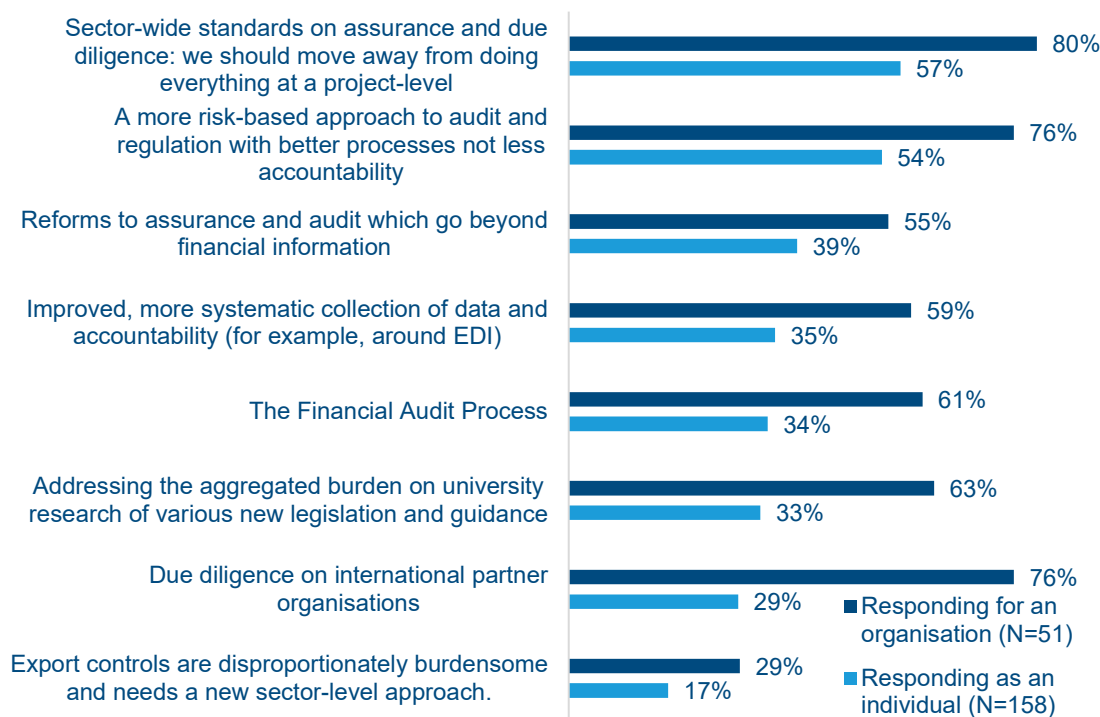
Question 15: which of the following could address the current issues with post-award assurance processes?

Finally, respondents were asked about changes that could address the current issues with post-award assurance processes. As with the previous questions, respondents could select all that applied.

In this section the closed responses that respondents could select from have been shortened for the purpose of displaying the data, for full responses please see:

<https://www.gov.uk/government/consultations/independent-review-of-research-bureaucracy/independent-review-of-research-bureaucracy-call-for-evidence-document>

Figure 7. Responses on what could address the current issues with post-award assurance processes



Note: The proportion of respondents answering ‘Other’ to this question are not displayed given low counts.

Figure 7. shows that a higher proportion of organisation-level respondents selected the options here compared to individual respondents. This may reflect the applicability of this question to certain groups and in certain organisations. Most notably, around 76% of organisations identified ‘Due diligence on international partner organisations’ as a solution to reduce bureaucracy in the post-award assurance process. However, the same issue was only identified by 29% of individual responses, suggesting that this may be more of an organisation-level issue.

The two most selected of these amongst both individuals and organisations were ‘Sector-wide standards on assurance and due diligence’ and ‘A more risk-based approach to audit and regulation with better processes not less accountability’ with around half of individuals selecting these and just over 74% of organisations.

Summary of written comments by question

Question 12: what are the main sources of unnecessary bureaucracy that need to be taken into account by the independent review?

120 respondents left additional comments to the list provided. They included:

On applying for funding: The need for simplified, quicker processes and assessments and faster response times were prominent themes. It was argued that 2-stage application approaches with light-touch initial applications which can be rapidly assessed should be the standard approach. It was also said that funding calls should be longer to support EDI and multidisciplinary research.

On audit and assurance processes, including reporting and monitoring: Reporting requirements were reported to be excessive and duplicative. The need to standardise costing models, monitoring and data requirements, and final project reporting was also mentioned. As part of a system-wide approach to assurance, it was said that more emphasis should be placed on institution-level assurance rather than project-level. A number of respondents focused on the complexity and duplication in health-related research approvals.

On digital platforms: A number of shortcomings were raised. These included a lack of interoperability across UK funding systems and lack of integration between third party systems.

Communications with funders: Responses suggested there should be greater coordination, signposting of research funding opportunities and clear guidance across funders and in how queries are addressed and shared to remove duplication.

Institutional bureaucracy: A number of respondents commented that institutional bureaucracy often stems from layers of external bureaucracy which build up but are not stripped back. However, it was also noted that some institutions over-interpret duties placed on them with local processes, for example on disproportionate governance and sign-off requirements.

Other requirements related to other (non-research) duties: The burdens associated with academics' wider responsibilities, for example teaching, were raised.

Question 13: what specific changes do you think could bring the biggest reduction in unnecessary bureaucracy?

101 respondents left additional comments to the list provided. They included:

Making financial audit, assurance and controls more efficient and/or effective: Audit, assurance reporting requirements and controls should be standardised and be proportionate to the risk and the value of the award. Comments also included the need for better coordination across funders and regulators to remove duplication. The regulation of clinical trials and ethical approvals should be proportionate to level of risk and nature of research.

Simplifying, aligning and integrating processes and requirements from funders: Processes should be simplified and aligned across funders, from application process, reporting requirements, terms & conditions, to audit. A sector-wide approach to assurance would remove the duplication resulting from an individual project approach.

Funders acting proportionately with the size of awards: Two stage processes should be standard. Length of grants should be increased with more time given to prepare for calls and with faster decisions from funders. The length and complexity of the application form should be proportionate to the amount of funds being spent.

Greater flexibility and agility in the funding system: Greater flexibility would allow teams to be more responsive to opportunities and would support the development and retention of researchers. It would however need to be tested to ensure the rigour of assessment is not compromised. An alternative, broader base of research funding sources, including those not tied to a specific project, would support a wider range of research, researchers, and support staff.

Addressing bureaucracy within individual institutions: More support is needed on a range of issues, from finance, health and safety and corporate responsibility to sustainability. There is also a need for more rapid and efficient processes for agreeing contracts between universities. Standard collaboration agreements should be implemented for use by all research organisations and other partners.

Improving digital platforms and systems: Systems need to be improved and better integrated. Greater interoperability of systems, for example through common data standards, would minimise the burden of reporting.

Better communications, strengthening funder-funded relationships and greater transparency: Improvements in the clarity, transparency and agility of communications and guidance was a general theme. There is also a need for consultation and support for HEIs before new requirements are introduced.

Embedding national security considerations and the protections in Trusted Research: The management of Trusted Research should be proportionate to the risk. A central platform to support due diligence assessments should be investigated further.

Question 14: which of the following would make the greatest difference to the application process?

89 respondents left additional comments to the list provided. They included:

Permitting resubmissions for applications to responsive mode schemes that score above a certain threshold: There were differing views on the merits of permitting resubmissions. Some thought it could be a good idea and save time if the threshold was set high enough. However, other comments noted that resubmission just adds burden for reviewers and funders.

Reducing the length of applications and ensuring that the amount of information required is proportionate to the size of the grant: Supporting comments noted that reducing the length of applications would help remove duplication and save reviewers' time.

Introducing a two-stage application process where the first stage is comparatively 'light-touch': Although there was broad support for a two-stage process a number of cautions were raised by respondents. The application length at stage one should not be reduced unless the review panel's expectation of detail change has changed accordingly. A number of respondents noted that 2-stage applications can add more time to the overall application process, with some noting it may increase bureaucracy.

Reducing the amount of time required for peer review and assessment: Comments included the need for consistent, high-quality and detailed feedback from peer reviewers. The idea of financial reimbursement for peer reviewers to speed up the process was also suggested.

Moving some of the tasks and processes currently required at application stage to the post-award/grant acceptance stage: It was noted that financial details and HR information could both be moved to post-award. However, there was a counter view that the post award stage was already too onerous.

Increasing the amount of time between a funding call being announced and the application deadline: A number of respondents noted that increasing call lengths would make the system fairer and that funders should avoid announcing calls before school/national holidays with deadlines just after the holiday period.

Making changes to the internal demand management processes required of universities by certain funding calls: There should be faster institutional approvals and responses and with more trust and flexibility given to lead researchers. There should be more resource and support for administration departments.

Simplified or otherwise revised guidance documents: Language used in calls should be simplified with common terminology and supporting, clear guidance.

Question 15: which of the following could address the current issues with post-award assurance processes?

56 respondents left additional comments to the list provided. They included:

A more risk-based approach to audit and regulation with better processes not less accountability: A number of comments focussed on health-related research. They included the need to simplify and streamline ethical approvals processes. Other more general comments recommended a proportionate approach to reporting and audit based on risk and financial value.

Improved, more systematic collection of data and accountability (for example, around EDI): It was noted that data collection is a significant burden. There should be greater use of standardised reporting platforms and central repositories of data.

Addressing the aggregated burden on university research of various new legislation and guidance: Specific mention was made of a number of policies on national security where more could be done to engage higher education institutions early in the development of policies and in supporting compliance.

Reforms to assurance and audit which go beyond financial information, including data management, concordats, harassment policies, animal use, proof of ethics, and collaboration with non-academic partners: Despite attempts to simplify, the audit burden has increased substantially. Clarity of reporting requirements and reporting only once would remove significant strain from the system. Funders should leverage the audit programmes undertaken by internal and externally appointed auditors.

Sector-wide standards on assurance and due diligence: There should be a move away from doing everything at a project-level: Streamlined processes and sector-wide standards and approach on assurance and due diligence should extend to the devolved nations. There should be alignment of terms and conditions between different funders.

The Financial Audit Process: Retrospectively applying new terms and conditions to awards should end and the financial audit process should be risk-based, consistently applied and proportionate.

Due diligence on international partner organisations – the Association of Research Managers and Administrators (ARMA) proposal for a central repository should be advanced with thought given to whether this might cover the broader requirements associated with Trusted Research: There is increasing burden on universities through new legislation and guidance, examples include due diligence of partners (particularly those overseas) and Trusted Research. Where possible, there should be sector wide, standard processes to avoid duplication at the level of the institution.

Additional comments: Responses noted a gap in the list of issues in this section around contractual bureaucracy which is a considerable burden. In addition, the issue about the delays

in the system such as gaps between notification of award and the transfer of monies and the impact this can have on recruitment was raised.

Question 16: please provide examples of funding models, processes, and infrastructure considered to support the Review's goal of reducing unnecessary research bureaucracy.

There were 134 responses to this open question. The main themes raised included:

Funding models: Funding models that made use of two-stage application processes were the most frequently cited example of ways to reduce unnecessary bureaucracy. A number of comments focussed on the reduction of bureaucracy through more block grant funding.

Greater flexibility and agility in the funding system: Ideas included placed-based research calls, longer programmes of research, direct core funding of research staff and devolving a proportion of funding to institutions to allocate themselves. A number of respondents promoted rolling cycles of open funding calls.

Processes: The harmonisation of funding bodies' assurance, financial audit, controls and administrative processes and procedures was a common general theme, as was making these more efficient and proportionate. To support harmonisation of reporting, processes should be supported by the use of templates and with the reuse of information wherever possible.

Infrastructure: Digital interoperability was raised as a route to reducing unnecessary bureaucracy. For example, this would include the role of ORCID to allow future reuse of personal data. The role of digital innovation to provide end-to-end admin support was also raised.

Timing: Examples were provided of funders publishing future grants schedules and running pre-call announcements to help potential applicants prepare. It would also avoid the clustering of awards and the impact this has on those seeking to apply. A number of respondents raised the issues around limited time to apply and the need for quicker decisions by funders. There were also a number of comments about the need for better communication and support by funders.

Communication: Simplified, clear information and closer working and support on funding schemes, harmonised across funders, would benefit applicants. Better feedback both on the content of proposals and how close they got to being funded will help both applicants and research development staff in supporting future applications.

Question 17: in addition to your responses to previous questions, would you like to add any further evidence and examples of unnecessary research bureaucracy which could be streamlined?

There were 121 responses to this open question. The main points raised included a mix of issues and solutions, and in a number of areas repeated responses to Question 16. The points were:

General: A key theme in responses was a lack of harmonisation across funders of policies and practices. There should be better consultation and communication between funders and the funded. The importance of Equality, Diversity and Inclusion data must not be compromised in efforts to reduce unnecessary bureaucracy.

Assurance: External audits can vary in their level of detail and there is duplication across funders. The need for multiple monitoring reports should be reduced. The audit process would benefit from examples of what is required backed up by training. To encourage collaboration, administrative requirements across disciplines and institutions should be rationalised. A number of respondents mentioned impact reporting with suggestions of how this could be done differently. A final point was on the sustainability of systems and user understanding with the suggestion that there should be no changes to reporting requirements for a set period of 5 years.

Funding models and application processes: It was noted there was a lack of alignment of funding cycles. The administrative burden of the Research Excellence Framework was mentioned though some respondents thought more block grant funding to universities would reduce bureaucracy. A general point was made that the distribution of funding itself was overly bureaucratic, and that alternatives such as a lottery or randomised system might be as effective. Several concerns were raised about peer review processes, including on inefficiencies and delays.

Institutional bureaucracy: A number of respondents followed a similar theme with the vast majority of the bureaucracy issues with institutions being driven by funder requirements, government requirements, and other similar obligations. Others noted risk aversion within universities as a driver of bureaucracy. In addition, some university processes (including HR and procurement) were highlighted as being overly burdensome.

Post-award stage: It was noted that implementing research contracts between the increasing number of parties involved in projects had become particularly complicated. Clearer definitions and consistency by funders on terms and conditions would reduce the bureaucratic burden. The process for applying for grant extensions or changes to projects should be streamlined.

Health: A number of specific issues on health-related research were raised, including disproportionate processes and approvals and forms and systems that are not user friendly or are duplicative.

Digital systems: There was a need to remove duplication and streamline digital reporting systems. There were a number of references to issues in using Je-S and Researchfish, and the limitations of NHS digital accounts.

Additional points raised: A number of respondents raised issues around Open Access reporting and compliance. Application submissions are made more difficult by inconsistencies around funder expectations on demand management, and a further point was on UK visa policies as obstacles to research.

Question 18: in addition to your responses to previous questions, would you like to add any evidence and examples of best practice in removing or preventing unnecessary research bureaucracy? What lessons can you share in identifying and bringing in effective changes?

There were 83 responses to this open question. A large number of examples were submitted across a number of themes spanning different funding models and approaches, digital systems and data reuse, on audit and assurance, specific international examples, and the speed, streamlining and flexibility of processes during Covid-19.

Question 19: are there any other issues relating to the review that you wish to bring to our attention?

There were 97 responses to this open question. The main points raised included a number of areas also raised in response to other questions:

General and cross-cutting: A number of comments related to the drivers of excessive bureaucracy, such as the ethical, legal, regulatory, or extra data reporting requirements by government. However, a point was raised around the perception versus the existence of bureaucracy, and what is internally driven by HEIs and what is externally driven. Other points mentioned that a general driver of bureaucracy was the overall growth of audit and reporting – including for the Research Excellence, Knowledge Exchange, and Teaching Excellence Frameworks. The role of artificial Intelligence in automating parts of the review and administration process was noted as a route to speed up processes.

On approaching reforms: There should be greater transparency, consistency, and standardisation across funders. When combined with better use and access of data this would support more interdisciplinary research and researchers. There should be regular, open dialogue between funders and research organisations to support new policies and their likely impacts.

Avoiding unintended consequences: Reforms must avoid displacing bureaucracy and compromising the rigour of assessment processes and the UK's global standing. Reducing

bureaucracy should be across the board (involving funders, universities, peer reviewers, applicants, and across the research life-cycle). Significant changes to current systems will inevitably increase the time researchers are required to devote to applications in the short and medium term. Reducing bureaucracy must safeguard and promote EDI and guard against only giving grants to “safe pairs of hands”.

Any reforms should be evidence based: The overall costs and benefits of activities across the whole system, and their interactions, should be the starting point for steps to reduce bureaucracy. An Equality Impact Assessment should form one test of both current practice and any changes.

The impact on researchers: It was the cumulative impact of bureaucracy in the system that was most detrimental. It was noted that staff turnover itself generates bureaucracy. Issues on bureaucracy are tied to research culture and therefore the Review’s implementation must be aligned with the People & Culture Strategy. A number of respondents mentioned that fixed term contracts for ECRs mean a disproportionate amount of time is spent applying for funding rather than focusing on the research.

Central resources: Funders should unite in a programme of work to promote shared repositories or a single UK-wide repository for publications arising from funded research, or draw on existing data sources to inform assessment exercises.

Health: A number of points were raised on where reductions in bureaucracy were underway and those areas that still needed to be addressed in health research.

Peer review shortcomings: The quality of the review process needs reform. The volume of requests for reviewing studies (and reports and publications) is excessive.

Deadlines and timings: The deadlines for submissions should be lengthened and rolling funding calls with deadlines provided 18 months ahead. There needs to be greater flexibility with either more lead time built in to complete agreements, or more flexibility in the overall project timeframes.

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