

For more information about the inquiry, please visit <https://www.gov.uk/government/publications/review-of-research-bureaucracy>

The Minister for Science, Research and Innovation has commissioned Professor Adam Tickell, Vice-Chancellor of the University of Sussex, to lead this review. The overarching goal of this review is to advise on a substantial reduction in unnecessary research bureaucracy in government and the wider sector, supporting our researchers to focus on research and related activities which contribute to a healthy research base.

The goals of the review will be to:

1. Identify the reasons behind real and perceived growth in research bureaucracy over recent decades, learning lessons from the past while challenging our collective assumptions about what is really necessary
2. Identify a wide range of specific reductions in overall research bureaucracy and in the bureaucratic tasks that researchers themselves undertake, which will be for government, funders and research organisations to consider and implement; they should consider objective measures of success from the point of view of frontline research staff
3. Ensure that government can continue to fulfil the requirement at an appropriate level of aggregation that can demonstrate impact and value for public money spent on research and provide evidence to support efficient and effective future investment
4. Support the wider UK research system to work more productively through this review
5. Identify effective funding models, processes and infrastructure, whether existing or new, that will support the UK research environment to be more dynamic, diverse and transparent
6. Ensure mandatory national security considerations and the protections in Trusted Research are embedded in research.

Summary:

- Relationship between grant funding and in vivo licence applications needs to be streamlined to prevent delays, waste, loss of skills and outsourcing of research or researchers to countries with lower standards of regulation
- Easier to resubmit failed funding applications in the style adopted by the NIH
- There is currently insufficient time to pull big consortia together and would likely stifle interdisciplinary working
- Members are strongly against a 'two-stage application' process. This is seen as adding more bureaucracy and time to a process that is already labour-intensive and is seen as a barrier to interdisciplinary applications being successful.
- Processing of licences for working with animals in research needs to be more straightforward, clearer and standardised between institutions to prevent bureaucratic creep and unnecessary duplication

Consultation response:

What are the main sources of unnecessary research bureaucracy that need to be taken into account by the Independent Review? Tick all that apply

Applying for funding

Financial audit processes

Reporting and monitoring

Security related risk management

☒ Regulatory requirements

Digital platforms for the application, management and outcome reporting of awards

Communications with funders

☒ Institutional research bureaucracy

Requirements related to other (non-research) duties

Other – please specify

Add any comments here

What specific changes do you think could bring the biggest reduction in unnecessary research bureaucracy? Tick all that apply

Making financial audit, assurance and controls more efficient and/or effective

☒ Simplifying, aligning and integrating processes and requirements from funders

Funders acting proportionately with the size of awards

☒ Greater flexibility and agility in the funding system

☒ Addressing bureaucracy within individual institutions

Improving digital platforms and systems

☒ Better communications, strengthening funder-funded relationships and greater transparency

Embedding national security considerations and the protections in Trusted Research

☒ Other changes which benefit researchers and research teams

Add any comments here

Relationship between grant funding and licence applications

Members have recently noticed a trend for Home Office Project Licence applications to be approved for a period shorter than the standard of 5 years based on whether funding is in place, or not, for the project. In the cases of which we are aware, the PPL has been awarded only for 1 year. The Animals (Scientific Procedures) Act 1986 (ASPA) does not stipulate funding as a condition for holding a PPL.

In the situations where this occurs, researchers could be in a situation where funding is dependent on having a PPL in place, and the PPL approval is dependent on funding, leading to a Catch-22 situation where a researcher has to apply for a PPL which is given only for a short time, then generate preliminary data, and apply for funding by which time the initial PPL may have run out. As funding and PPL applications could both take ~1 year (if successful) to secure, this massively increases the workload and bureaucracy for researchers using and training others in vivo research

skills, which are recognised by the APBI as being in short supply in the UK. Scientific

This leads to unnecessary delays and bureaucratic waste, particularly for early career researchers. Our concerns are threefold: that this increased barrier and bureaucracy will lead to outsourcing animal research to collaborators in other countries where welfare standards are not as high as the UK; the loss of training in highly sought after research skills, and the loss of researchers to other countries where barriers to research progress are not as high.

Better communications and greater transparency are particularly important for researchers outside the golden triangle, who can't easily meet programme officers informally face-to-face.

Which of the following would make the greatest difference to reducing unnecessary bureaucracy in the funding application process? Tick all that apply

Permitting resubmissions for applications to responsive mode schemes that score above a certain threshold

☒ Reducing the length of applications and ensuring that the amount of information required is proportionate to the size of the grant

Introducing a two-stage application process where the first stage is comparatively 'light-touch'

Reducing the amount of time required for peer review and assessment

☒ Moving some of the tasks and processes currently required at application stage to the post-award/grant acceptance stage

☒ Increasing the amount of time between a funding call being announced and the application deadline

Making changes to the internal demand management processes required of universities by certain funding calls

Greater alignment of rules and regulations between different funders and schemes and organisations

Simplified or otherwise revised guidance documents

Other (please specify)

Add any comments here

In relation to the resubmission of applications to panels, an NIH-like process would greatly enhance the ability to a) ensure that the best applications/ideas eventually receive funding support, and b) that funding is awarded more transparently and based on merit. This increased transparency and flexibility would not only reduce burden, it would also address the lower number of awards to underrepresented groups and level the playing field, as the evidence show that these groups often feel deterred from repurposing or resubmitting rejected applications.

Members have noted that many Expressions of Interest (EOI) now have a six week turnaround which is insufficient time to pull big consortia together and would likely stifle interdisciplinary working. Additionally, members are strongly against a 'two-stage application' process. This is seen as adding more bureaucracy and time to a process that is already labour-intensive and is seen as a barrier to interdisciplinary applications being successful.

Which of the following could reduce unnecessary bureaucracy in post-award assurance processes. Tick all that apply

☒ A more risk-based approach to audit and regulation with better processes not less accountability

Improved, more systematic collection of data and accountability (for example, around EDI)

☑ Addressing the aggregated burden on university research of various new legislation and guidance: this includes Trusted Research (and funder requirements based on this guidance), Academic Technology Approval Scheme (ATAS) reform, the National Security and Investment Act, and new proposed legislation to counter state threats.

☑ 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. Sector-wide standards on assurance and due diligence: we should move away from doing everything at a project-level

☑ The Financial Audit Process - retrospectively applying new terms and conditions to awards should end as it makes it exceedingly difficult for Research Offices to comply.

☑ Due diligence on international partner organisations

☑ Export controls are disproportionately burdensome and needs a new sector-level approach.

Other – please specify

Add any comments here

Processing of licences for working with animals in research

The serial processing approach of Home Office Project Licences (where local Animal Welfare and Ethical Review Bodies (AWERB) review has to be completed before the Home Office will review licence applications but then Home Office feedback has to be resubmitted to local AWERBs) stifles progress and is present at both application and amendment stage. Some of our members have reported the Home Office quoting 20 working days for a response on often minor amendments such as specific information on materials used. The Home Office could approve licences

The Physiological Society also supports the development of clearer guidance to stop bureaucratic creep occurring as a consequence of institutional non-compliance. Some members have reported duplication of PPLs and amendments in equivalent local paperwork. Members have also reported delays on 'pre-study briefing' (PSB) approval to order animals as a result of the briefing not including certain procedures despite those procedures being covered by PPL protocols.

Overall, in order to address bureaucracy in licence processing and issuing, ASRU should engage fully with the regulated community to ensure bureaucratic processes are proportionate and fit for purpose. ASRU should also be prepared to give advice to AWERBs on what they expect them, and importantly what they do not expect them, to do. This is because local 'gold plating' is in part designed to mitigate the potential effects of changes in ASRU and less interaction between the regulator and the regulated community which has always enabled more effective working. The bureaucracy review is a timely opportunity to reduce waste in the system by developing a two-way engagement process rather than purely a top-down compliance monitoring relationship.

Burden on university research of various new legislation and guidance

Members have noted that they are now required to declare all collaborations with 'suspect' countries, and subject those collaborations to risk assessment and scrutiny under new legislation. Members noted that this was already occurring prior to the introduction of new legislation but that institutional burden has increased.

Audit process

There is a disconnect between paperless approaches demanded at host institution and then requirement for a paper audit trail by UKRI.

Please provide examples of funding models, processes and infrastructure that you consider could support the Review's goal of reducing unnecessary research bureaucracy.

The Physiological Society members have identified the NIH model of funding as an example of a funding model and process that could support the Review's goal of reducing unnecessary research bureaucracy. The NIH funding model includes expert panels, transparent ranking of proposals, clear funding cut-off points, publication of the cut-off and communication to the applicant of the centile in which the proposal sat along with the ability to revise and resubmit in response to reviews, rather than having to make the project 'substantively' different for resubmission.

These processes clearly allow funding in the USA to be more widely spread, not only concentrated in the elite and are not based on applicant track record but on the merit of the project. Provided efforts are made to minimise bias in review and panels, it can also address the known inequalities in funding award for women and underrepresented groups.

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?

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?

Are there any other issues relating to the Review that you wish to bring to our attention?

The Physiological Society's is actively involved in promoting interdisciplinary research and equality, diversity and inclusion (EDI). It is clear that some additional bureaucracy is required within the Research Excellence Framework (REF) process to ensure these important elements of publicly-funded science are not overlooked.

A prominent example is the move towards a fully bibliometric-based REF. This would disadvantage women and researchers with other protected characteristics, who tend to have smaller networks, and are known to accumulate lower citation rates compared to their white and/or male colleagues, rendering H indices, for example, as inherent biased metrics.

Furthermore, our analysis of interdisciplinary research within the REF has identified that interdisciplinary research faces additional barriers for its inclusion and assessment. As part of our

report on REF and interdisciplinary research, we recommended that the REF outputs in future cycles contain an option for an additional context narrative to explain the interdisciplinary context of research outputs. While optional, this will ensure that the impact of interdisciplinary collaboration is recognised and included in the REF in a clearer, more uniform way than the 'Interdisciplinary flag' which was used in the most recent REF assessment.