1. Thank you for the opportunity to comment on the possible options for demand management being considered by the Council. We recognise the difficulty of this issue, but also the wastage of resources and lowering of morale that the current success rate of 15-20% implies. The following comments are made on behalf of the University of Sussex.

2. We welcome the approach that the Council has adopted, in introducing an initial set of measures, along with this consultation on further measures. We support the introduction of invited resubmission and the greater use of outline applications and office sifting. We also welcome the prospect of full performance data being provided to the institution. On this latter point, we would reinforce the need for this to include relevant referee/panel comments, so that we are able to support our applicants in improving the quality of their proposals.

3. We also wish to encourage the Council to seek to achieve harmonisation across all the Research Councils wherever possible. This will have efficiency benefits for both the Councils and institutions.

A. Which main demand management options are worthy of further development and why?

A.1 Individual Sanctions

4. If further measures are required, of the options provided we would support the use of individual sanctions. We believe individual sanctions would directly affect individual behaviours in ways that approaches at higher levels of granularity would not. We support the use of an absolute quality measure (i.e. that applications meet an alpha grade equivalent), rather than being in the upper half of a ranked list.

5. We suggest that a similar approach be taken by the Council towards individuals as is suggested in the approach towards institutions, namely the use of a warning letter and a period for improvement. This would provide the supportive environment that should characterise the sector.

6. We agree that the Future Research Leaders scheme should not be included in the sanction calculations.

7. We note that data to be used in any sanctions process is to be collected from summer 2011. If two-year averages are to be used, this implies that sanctions could not be introduced until 2013, which gives the sector sufficient time to respond.

8. We also note that the proposed sanction (no applications for 12 months) is harsher than that of the EPSRC, which allows one application in the period.

9. The paper suggests that the main disadvantage of researcher sanctions is that it reduces the responsibility of HEIs. We do not agree, and would suggest that the publication of success rates and relative gradings would have a direct effect on institutional behaviours. The Council might also wish to consider publishing by institution the numbers of staff sanctioned at any given time. In addition, having an
individual barred from applying means no income to support their research, and potentially reduced outputs as a consequence. Whilst the relationship between income and outputs is not quite as strong in social sciences as in many physical and life sciences, it nevertheless exists. Researcher sanctions will thus elicit an equally strong institutional response as would other methods.

A.2 Institutional Sanctions

10. We continue to have concerns about institutional sanctions. Most universities are diverse organisations, and hence sanctions at an institutional level are likely to be contentious (i.e. performance in one subject area affecting the ability of another to apply). It might therefore be better to apply the analysis and outcome at a sub-institutional level, e.g. department (with the choice being the institution’s to make). Whilst this is likely to be fairer, and enable finer-grained attention, the volume of activity at departmental level might make the statistics problematic. This would also allow recognition of different patterns of activity between social science subject areas.

11. If sanctions were to be used, we support the use of a warning letter and period for improvement. We are pleased to see that the Council would use a quality threshold rather than success rate or ranked list. We would like to see this approach adopted by EPSRC, because success rates are dependent on criteria outwith the control of the institution (e.g. funds available and the specific competition in a given round).

12. In terms of the proposed criteria, a 50% threshold seems to be reasonable, but it would be useful to see what proportion of institutions would have been affected (and for a given institution, if they would have been affected) if this had been in place. The consultation paper says that modelling of data suggests that institutional sanctions have the potential to make a difference, but no details have been provided.

13. We would note that the proposal that all participating institutions would be affected by an unsuccessful (below quality threshold) application might have some unintended consequences with respect to discouraging collaborations. It also reinforces the requests that institutions have previously made to the Councils to enable each partner institution to sign off in Je-S any application in which they are a part. Those previous requests (by ROCG to RACG) have been in the context of ensuring resources are correct; this now introduces a requirement to be able to assure ourselves about the quality of all proposals, and hence amplifies the need.

14. We agree that the Future Research Leaders scheme should not be included in the sanction calculations.

15. We do not believe that it is wholly likely that institutional sanctions would lead to an increase in applications as suggested. This implies a more managed situation than typically applies.

B. How might those options be further developed and refined?

16. The Maximising Transparency section of the consultation document provides a minimum set of information that will be provided. It is not clear whether the Council intends to make institutional performance public, i.e. the relative performance (based on grades) of each institution (possibly by subject area). Such transparency might help to concentrate institutional and departmental minds in ensuring quality in all applications. As already noted, publishing the number of sanctioned individuals by institution might also act as an incentive.
17. With respect to sifting mechanisms, we recommend that outline applications are not included in the sanctions policy. This will then prevent the threat of sanctions from inhibiting potentially good outline applications to be made, and hence support engagement from all areas of the academy. In making this comment, we recognise the issue of “kite flying”, and hence the Council might wish to consider including outlines in the metrics on a weighted basis.

C. Which, if any, of the main demand management options would you not consider for further development and why?

C.1 Charging for Submission of Applications

18. Of the mechanisms suggested, we strongly believe that payment for applications should not be pursued in any form. As noted, there is no evidence of it being used anywhere else, the fee would increase the indirect costs of research at a time when we’re being required to reduce them, and there would be a cost of administration, in both ESRC and research organisations. In addition, the ability to pay will not necessarily reflect research excellence, which should be the driving criterion, and any fee could disadvantage weaker areas of the social sciences. Trying to use the fees for positive incentives (e.g. payment of referees) would only serve to add to the complexity and to the administrative costs.

C.2 Institutional Quotas

19. We do not support the use of institutional quotas, in general, although they might have a place for certain managed schemes (e.g. Centres). General quotas would have the effect of entrenching previous patterns and may not reflect research excellence as it develops and evolves, especially across subject areas. Creating and managing the bands would be problematic and contentious. Institutional quotas might encourage restrictive practices, and also increase the potential of missing innovative proposals.

D. Overall, which of the options offers the best opportunities to effectively manage demand whilst ensuring the flow of high quality research applications?

20. We believe that greater use of outline applications, plus researcher sanctions along with appropriate publication of performance are the most appropriate options to pursue. If not already contacted, the Council might wish to discuss the operation of an outline process with the Leverhulme Trust, who have been operating that way for a number of years.

E. Are there any further options which are not included in this paper which should be considered by us as part of our demand management strategy?

21. We do not have any further suggestions.

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