

# 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.**

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If your enquiry is related to the policy content of the consultation you can contact Jim Cutshall on:

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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](mailto:consultation.unit@dfes.gsi.gov.uk)

Please place an x in the box below that best describes you as a respondent

|   |  |  |
|---|--|--|
| <input type="checkbox"/> higher education institutions          | <input type="checkbox"/> university teachers               | <input type="checkbox"/> university administrators |
| <input type="checkbox"/> higher education representative bodies | <input checked="" type="checkbox"/> Other (Please specify) |  |

Please Specify:

ALT – <http://www.alt.ac.uk/> – is a professional and scholarly association which seeks to bring together all those with an interest in the use of learning technology. With over 200 organisations and over 500 individuals in membership we:

- \* promote good practice in the use of learning technology in education and industry;
- \* represent the members in areas of policy;
- \* facilitate collaboration between practitioners, researchers, and policy makers.

ALT aims to establish the area of learning technology as a discipline in its own right. For this reason we have made particular efforts to influence RAE 2008 (see, for example, a number of the documents which can be accessed at <http://www.alt.ac.uk/documents.html>) alongside forming a Research Committee, a list of whose members can be found here: [http://newsletter.alt.ac.uk/e\\_article000565141.cfm](http://newsletter.alt.ac.uk/e_article000565141.cfm). The ALT Research Committee has contributed to the production of this brief consultation response.

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

Comments:

STEM subjects. However, Learning Technology research is frequently highly interdisciplinary, in which case assessing it when it falls between a panel using a metrics-based approach and one which does not would be problematic.

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:

QA rating of journals in each discipline.

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:

Model B seems the least 'unpreferred'. Would it not prove feasible to run light touch annual review based on metrics that are already gathered, for example for the purpose of annual returns?

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

Comments:

The alternative approach outlined in Appendix 2 has some merit. Any system in which, for example the PhD completion-rate is used as a metric, needs to take account of the institutional context, for example where an institution has an access mission. Measures of impact on users (in the case of learning technology this means, typically, students and teachers) is important, but difficult to measure, since "STEM-style" impacts such as patents or spin-off company start-ups are not the norm.

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

Comments:

All of the models will focus even more pressure on the selection processes for funded research. The 'solution' is to spread the determinants over as wide and large a number of metrics as possible.

In fact, the current RAE processes have many more undesirable consequences than those listed in the Consultation document. They have certainly led to the proliferation of second rate journals and journal articles, and to the poaching of senior academics. The proposed models will undoubtedly have undesirable effects as well, and many are 'unforeseeable'. Nevertheless, as least the proposed models will be less costly and time consuming.

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

Comments:

No comment

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

Comments:

No, submissions to funding bodies are complex enough already. Reference probably will be made to them and that is sufficient.

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:

Yes, still important but it is also important that the process be 'slimmed down'.

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 x**

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?

X 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](mailto:rae.consultation@dfes.gsi.gov.uk)