

Department for Business, Energy, and Industrial Strategy
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29 September 2021

RE: Independent review of research bureaucracy call for evidence

1. With about 45,000 members in over 100 countries and a knowledge business that spans the globe, the Royal Society of Chemistry is the UK's professional body for chemical scientists, supporting and representing our members and bringing together chemical scientists from all over the world. Our members include those working in large multinational companies and small to medium enterprises, researchers and students in universities, teachers and regulators
2. We welcome the government's commitment to taking a system-wide review of unnecessary bureaucracy in research, and believe there are steps that could be taken to reduce excessive burdens on researchers during the application and delivery of research. At the same time, it is vital that efforts to reduce the burden of work do not stymie ongoing efforts to improve equality, diversity, and inclusion (EDI) in research. The R&D People and Culture Strategy rightly identifies the importance of a diverse and inclusive research culture, and the RSC has long championed this cause, gathering data to inform evidence-based recommendations as well as policies of our own. It is only through prioritising EDI, in research application and awarding processes, that the UK will be able to create a research environment that attracts and retains highly-skilled talent.
3. It is not currently clear how this review will link into planned similar reviews. The People and Culture Strategy does not explain how this review will take into account the UKRI review regarding expert peer review, nor the review related to full economic costing. These issues are related and should be considered as a package.
4. The key issues that we wish to bring to your attention in response to this consultation are:
 - i. **Greater alignment between funders** in the UK landscape and clear criteria for funding would make application and reporting processes simpler for researchers and innovators;
 - ii. **Where the burden falls:** It is essential that data collection, application, and assessment processes designed to support EDI do not disproportionately burden people from underrepresented communities with the work of delivering them;
 - iii. **Protecting national datasets:** Progress in EDI objectives is underpinned by comprehensive data collection, and government should seek to improve upon and strengthen this evidence base, rather than reducing the amount of information collected;
 - iv. **Understanding the health of the landscape:** Any efforts to streamline duplicate grant schemes should take account of a range of factors, including place, discipline, and EDI;

Greater alignment between funders

5. The RSC recognises the assurance and accountability requirements placed on funders, but greater alignment between funders in the UK landscape would reduce the complexity of application and reporting processes, freeing up time for researchers on the ground. The UK research and innovation system currently places a diverse range of requirements on researchers and research organisations which often seek to collect the same information in a number of different ways. This places additional burden on researchers during the application and delivery of research.
6. This significantly impacts chemistry researchers because chemistry has applications in such a wide range of fields: recent RSC research, [Science Horizons](#), which captured the views and experiences of over 750 active chemical sciences researchers around the world found that 90% had collaborated in the last five years with people outside their field or subfield. This interdisciplinarity is also evident in the fact that, even within UKRI, chemistry receives some level of funding from almost every research council, with different information requirements for each.
7. The RSC has commissioned the Enterprise Research Centre to carry out a research project work on 'What works for innovation', to gather evidence on chemistry-intensive SMEs and their R&D and innovation activities, including the key drivers and barriers to innovation. This research is indicating that there are some bureaucratic burdens for SMEs which can be a barrier to applying for public funding. One of these is that criteria aren't always clear. The research is currently at the testing stage, but we would be happy to discuss findings with you pre-publication.

Where the burden falls

8. We believe that resourcing processes designed to support EDI have demonstrated great value in supporting a more holistic understanding of the research landscape. The RSC has brought together 44 publishing organisations in a joint commitment that sets a new standard to ensure a more inclusive and diverse culture within scholarly publishing, including commitments to better understand our diverse community. However, it is important to acknowledge and address that research has shown that individuals who self-identify as members of currently underrepresented groups are more likely to experience a disproportionate burden in the delivery of these processes.
9. UK research organisations need to review their approaches to these processes, and government should consider how any future changes to data collection, as well as application and assessment requirements, will be implemented by research organisations, to ensure that engagement with this important agenda does not affect researchers from underrepresented groups disproportionately. For example, our joint commitment with other publishers sets out that we will work towards a collective and compliant system so that researchers only need to self-report data once. Overburdening these groups risks a perception that people from all backgrounds are not equally supported in application and assessment, hampering our ability to inspire the broadest possible talent pool into research and innovation.

Protecting national datasets

10. The RSC recognises the burden placed on research organisations in the collection and consideration of EDI data in the research sector. However, reducing the amount of information collected risks negatively impacting progress in this area.
11. An evidence-led approach to EDI ensures organisations and individuals can reflect on their practice and be held accountable for progress against their own EDI commitments, alongside their legal obligations. In order to achieve this, it is essential that the right data is collected at the right time. Although we welcome commitments to supporting EDI, we are keen to reinforce the importance of ensuring continued improvements in the national equality and diversity data collected. Reducing the bureaucratic burden must be achieved through improved processes, rather than a reduction in the information collected.
12. For example, recent changes made to data collection by the Office for Students has resulted in data about technicians being re-categorised as a voluntary rather than required data item. Over time this will reduce the comprehensiveness of the data available on the research workforce, making it difficult to plan and mitigate for potential shortages, and widen the ever growing technical skills gap. This is of particular concern in heavily lab-based subjects like chemistry where technical expertise is an essential, underpinning skillset within the research and innovation pipeline of future workers and will risks undermining efforts to develop skills needed to achieve net zero and to deliver increased research and development activity.

Understanding the health of the landscape

13. The RSC recognises the needs and benefits of streamlining duplicate grant schemes to simplify the application and management of awards. In reducing burden on researchers and research organisations it is important to consider the role of place as well as disciplines and interdisciplinarity and how this can be interrogated from the data and information available. Characteristic tagging including discipline, region and EDI would be a legitimate ask for substantive value.
14. The UK research landscape demonstrates strength across disciplines and can collaborate effectively internationally because of this breadth and vitality. When streamlining funding approaches and the data collected to support their award and evaluation, monitoring and understanding the different elements of the landscape will ensure a holistic understanding of the health of the whole.
15. As part of driving a positive research culture change, requiring researchers to move towards more transparent and open research practices, for example Open Access publishing and Open Data is welcome. However, the processes that enable and support these changes must be adequately resourced so undue burden is not placed on researchers and cohorts of researchers (i.e. early career researchers) are not disproportionately impacted.
16. We hope this submission will be useful in your review, and we would be happy to discuss further any of the issues raised.

Kind regards,

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