Joint response by Universities UK and the UK HE Europe Unit to the Department for Business, Innovation and Skills Call for Evidence on the Framework Programme.

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Introduction

1. This document is the response of Universities UK (UUK) and the UK Higher Education Europe Unit to the Department for Business, Innovation and Skills (BIS) call for evidence on the European Union's Framework Programme for research.

2. The UK higher education (HE) sector is a major research player in Europe, engaging actively in and benefitting substantially from European funded programmes and initiatives. UK researchers have, to date, been awarded a total of €1.83 billion (£1.64 billion) under the successive Framework Programmes.

3. The UK HE sector is committed to engaging constructively with the European research agenda. The sector supports the continuation of research and development as a major spending priority for the European Union (EU), and believes it is important not to lose sight of the EU's goals for R&D intensity, set out in the Europe 2020 agenda.

4. UUK and the Europe Unit are representative organisations that work on behalf of UK higher education institutions (HEIs). The document draws on submissions by UK higher education institutions, and has been written in consultation with sector bodies. As such, this document highlights those policies and priorities where consensus exists across the sector.

Responses to questions set out in BIS call for evidence on the Framework Programme

Q1 What should the UK's high-level objectives be for FP8?

Sustainable Funding

5. The UK HE sector urges BIS to call on the European Commission to expand the budget for the next Framework Programme, both as a proportion of the EU budget and in real cash terms. Only a substantially increased level of funding would accurately reflect the greater recognition of the importance of research and innovation to achieving the goals of the Europe 2020 agenda. The sector highlights the

importance of sustainable funding for European research ahead of other more traditional budget concerns, such as the Common Agricultural Policy.

Continuity

6. The UK HE sector draws attention to the accumulated expertise that has been built up in European HEIs over the period of the successive Framework Programmes. So as to retain as much continuity as possible in the transition to the next Framework Programme, the sector recommends that rules and procedures should only be changed where change is really necessary. Where a procedure is working it should be retained or improved.

Excellence

7. The UK HE sector continues to support the use of excellence as the prime criterion for determining receipt of research funding in Europe. At a time of fiscal constraints and increasing competition from other regions of the world, research quality has to be the over-riding factor in the distribution of research funding at the European level if we are to compete on the international stage. There is widespread support from across the UK HE sector for the next iteration of the Framework Programme to expand the use of excellence in the allocation of funding, so that the whole of the Framework Programme is premised on funding the best work.

European Research Council

8. The sector continues to be a strong supporter of the European Research Council (ERC), and would like to see it afforded a significantly greater proportion of Framework Programme funding after 2013. The sector warns against changes to the basic concept of the ERC, which has been highly successful.

Marie Curie Actions

9. The HE research community in the UK is strongly supportive of the continuation of the Marie Curie Actions into the next Framework Programme. The sector urges BIS to support the retention of the flagship Marie Curie Actions without any significant change being made to them.

Innovation

10. Development of the innovation component of the Framework Programme could potentially offer enormous opportunities for UK HEIs and businesses. At the same time, the Commission should take steps to ensure that the primary focus of the Framework Programme remains on research.

Grand Challenges

11. The sector is supportive of the Grand Challenges Agenda. While the sector agrees that the next Framework Programme should be open to new societal challenges, it is crucial that the Programme retains both the element of thematic focus – along the lines of the FP7 Cooperation Programme – and ‘space’ for research into new and emerging areas.

Simplification

12. The sector urges BIS to call on the Commission to take steps towards a more trust-based system of regulation, in which nationally approved certification, accounting and management practices are accepted.

Q2 How can FP8 help deliver economic growth throughout the life of the Programme and beyond?

13. The Framework Programme plays a key role in enabling HEIs to contribute towards the EU collectively achieving a level of research capacity and excellence capable of securing Europe as a world player in research and development. Research and innovation in Europe underpin both short and long-term economic growth. The Framework Programme should sustain and expand its focus on supporting the best research, so as to ensure the highest levels of competitiveness and impact, particularly in the light of increasing competition from the United States, China and Japan.

14. The Framework Programme is a crucial element in the training of the researchers which drive research and innovation activity, and provide the teaching that equips the European workforce with the skills necessary to sustain economic growth. FP8 should continue to fund the training of researchers through, for example, the people Programme (Marie Curie Actions), both as a way of supplementing researcher careers, and as a means to attract researchers to Europe.

15. The direct contribution of the Framework Programme to economic growth depends to a large extent on the capacity to be innovative with the results of research funded by the Programme. It is looking increasingly likely that the next Framework Programme will seek to implement not just the European Research Area, but the broader European project of the Innovation Union. This development offers a substantial opportunity to bring about a step-change in the contribution of the Framework Programme to economic growth. FP8 should continue to support collaboration and knowledge transfer between research organisations and business. One possible way forward in this regard could be the development of a 'follow-on' fund similar to that pioneered by the Engineering and Physical Sciences Research Council.[1]

Q3 How should FP8 support the wider European context including Europe 2020 and the European Research Area?

FP8 budget

16. With the move towards the development of the European Union as an 'Innovation Union', research and innovation have become central to the overarching agenda of the EU. As the Framework Programme is the EU's primary instrument for funding

[1] For more information on the 'follow-on fund', visit http://www.epsrc.ac.uk/funding/grants/business/schemes/Pages/followonfund.aspx

research, it is crucial for the success of the Innovation Union agenda that FP8 is sufficiently funded. The UK HE sector urges BIS to call on the European Commission and the European Parliament to expand the budget for the next Framework Programme, both as a proportion of the EU budget and in real cash terms.

17. Only a substantially increased level of funding would accurately reflect the greater recognition of the importance of research and innovation to achieving the goals of the Europe 2020 agenda, in particular the objective for 3% of the EU's GDP to be invested in R&D by 2020. The sector calls on BIS to highlight the importance of sustainable funding for European research ahead of other more traditional budget concerns, such as the Common Agricultural Policy.

Innovation and excellence

18. The role of the Framework Programme as the EU's main instrument for funding research means that it will be a prime site where the balance between innovation and research takes shape. As such, FP8 will have a crucial role in safeguarding EU competitiveness by retaining the primacy of excellent research alongside innovation objectives.

19. It is likely that the next Framework Programme will seek to couple the Programme's existing objective of bringing about the European Research Area with a new set of objectives orientated towards innovation. Research and innovation are closely linked, and the UK HE sector is broadly supportive of the EU's efforts to enhance the value of research results through initiatives such as the development of a single European patent.

20. At the same time, it is important that the introduction of new objectives and initiatives designed to bring about the Innovation Union do not detract from the primacy of excellence in research at the European level. As outlined in the Europe 2020 agenda, the capacity of EU researchers to produce world-class research is central to the EU remaining competitive in the face of increasingly intense competition from other regions.

Q5 How can FP8 make a positive contribution to the UK economy? Q6 How can FP8 support innovation in the UK?

21. UK researchers have so far been awarded a total of €1.83 billion (£1.64 billion) under the successive Framework Programmes. In times of economic difficulty and cuts in higher education, the Framework Programme provides a valuable source of funding for research, both for HEIs and private organisations.

22. The Framework Programme should continue to promote the engagement of UK research organisations and businesses with the best European and third-country partners. In this way, FP8 can contribute to the UK economy by facilitating

international R&D relationships, and establishing the UK as a research- and business-friendly country.

23. The Framework Programme provides a mechanism for HEIs and businesses to cooperate in research and innovation activity. FP8 is likely to include enhanced ways of supporting small and medium-sized enterprises (SMEs), a development which the UK's Technology Strategy Board (TSB) should take advantage of in its efforts to encourage cooperative relationships between HEIs and SMEs in the UK.

24. The current Framework Programme supports innovation in the UK by providing funding for bottom-up frontier research through a number of its programmes, including Future and Emerging Technologies (FET), the Ideas programme (European Research Council), and the People programme (Marie Curie Actions). FP8 should continue to support innovation in the UK by making funding available for 'blue skies' research.

Q7 What are your views on the split of the FP7 budget between these specific programmes? Should this change in FP8?

25. The balance between specific programmes should reflect the primacy of excellence as the principle criterion for awarding funding within the Framework Programme. There is widespread support from across the UK HE sector for the next iteration of the Framework Programme to expand the use of excellence in the allocation of funding, so that the whole of the Framework Programme is premised on funding the best work.

26. There is strong support from the UK HE sector for the expansion of the European Research Council and other mechanisms within the Framework Programme that support risk-friendly frontier research. The balance of specific programmes in FP8 should reflect this.

27. While the UK HE sector agrees that the next Framework Programme should be open to new societal challenges, it is crucial that the Programme retains the element of thematic focus – along the lines of the FP7 Cooperation Programme – and 'space' for research into new and emerging areas. Such a balance of directed and non-directed research is necessary to ensure that those fields not fitting within selected Grand Challenges are not diminished by attention to more politically driven priorities.

Q8 Which areas of Framework Programme funding provide the most EU added-value?

The European Research Council

28. The European Research Council embeds the principles of excellence and bottom-up research at the heart of European research, and raises the standards of national research efforts by setting a clear and inspirational target for frontier research in Europe, demonstrating the real added value that can come from EU funded activities.

Marie Curie Actions

29. The Marie Curie Actions programme is highly valued by the HE research community in the UK, which strongly supports the continuation of Marie Curie into the next Framework Programme. With regard to added value, the UK HE sector is concerned that the transfer of the Marie Curie Actions from the Commission's Directorate General for Research to its Directorate General for Education and Culture may have implications for its continuation as part of the next Framework Programme. Marie Curie funds high quality *research*, albeit with a training and mobility focus, and positioning it as removed from the Framework Programme could compromise the European added value of Marie Curie for EU researchers.

Q10 What are the arguments for and against FP8 moving towards funding research and development which addresses grand challenges? Q13 Should FP8 still provide some thematic focus e.g. in areas such as space and transport? Should any of the current themes be re-visited over the course of FP8 – and if so, how?

30. The UK HE sector is supportive of the Grand Challenges agenda. The sector recognises that research is critical to solving shared societal challenges, and that efforts to meet such challenges can have a greater impact when the endeavours of member states are coordinated.

31. While the UK HE sector agrees that the next Framework Programme should be open to new societal challenges, it is crucial that the Programme retains both the element of thematic focus – along the lines of the FP7 Cooperation Programme – and 'space' for research into new and emerging areas. Such a balance of directed and non-directed research is necessary to ensure that those fields not fitting within selected Grand Challenges are not diminished by attention to more politically driven priorities. It would also help to ensure that the Framework Programme continues to fund research that contributes towards identifying the unknown Grand Challenges of the future.

32. The UK HE sector is concerned that smaller research actors may become excluded from the bidding process for projects related to Grand Challenges and effectively be disenfranchised, thus undermining the creation of the ERA. One option would be to ear-mark funding within the next Framework Programme for smaller projects.

Q14 What should be the role of key enabling technologies e.g. ICT and nontechnology in FP8?

33. The use of ICT in research is a particular strength in the UK, and UK HEIs are keen to see it continuing to underpin the whole range of funding priorities in FP8. There is broad support from across the UK sector for research focussed specifically on the development of new enabling technologies to be connected to the disciplines they

seek to enable, so as to maximise the value of ICT research, and to avoid the development of superfluous technology.

Q16 What are your views on how the Framework Programme allocation for collaborative research should be apportioned between themes; enabling technologies and underpinning areas of research e.g. social sciences and humanities?

34. There is strong support from many HEIs across the UK sector for the continuation of support at least at the current level for social sciences and humanities research. Social sciences and humanities research is a key strength in the UK, and is crucial in the development of the cultural understanding necessary to inform the understanding of new technologies for sustainable social and economic change.

Q17 To what extent should ERC funding focus on supporting frontier research? Are there other areas in which ERC could add value? Q18 Should ERC's current emphasis on funding a single investigator continue into FP8?

35. The UK HE sector continues to be a strong supporter of the European Research Council, which has become a 'beacon' for excellence across Europe. The ERC embeds the principles of excellence and bottom-up research at the heart of European research, and raises the standards of national research efforts by setting a clear and inspirational target for frontier research in Europe, demonstrating the real added value that can come from EU funded activities.

36. To enable the ERC to continue to make a real difference to the EU research landscape, the sector would like to see it afforded higher priority after 2013, with a significantly greater allocation of Framework Programme funding.

37. While the UK HE sector wishes to see an expanded ERC after 2013, the sector warns against changes to the basic concept of the ERC, which has been highly successful. Any move away from bottom-up research led by a principle investigator, for example, would risk creating overlaps with other areas of the Framework Programme. It would also detract from the distinctiveness of the ERC's particular brand of research, thus diminishing its capacity to function as a benchmark for high quality research in Europe.

Q19 Are there any options that could better link ERC activities with private sector interests?

38. It is crucial that any requirement for or expectation of private sector involvement with the ERC does not undermine the ethos of bottom-up, high-risk research. This is already recognised in the current arrangements regarding private sector interests, which provide for private sector involvement as a subsidiary part of the scheme.

Q20 What priority should researcher mobility and skills development have in FP8? What is the best way to address this?

39. Mobility among researchers enables the cross-fertilisation of ideas, methods and techniques, and encourages the development of linkages across sectors and with international industries. It also brings with it wider academic social and cultural advantages, such as the benefits to students of being taught by staff who have been mobile. Therefore, the UK HE sector believes that mobility should retain a high level of priority in FP8, without impinging on national initiatives in such areas as social security and pensions.

40. The Marie Curie Actions programme is highly valued by the HE research community in the UK, which strongly supports the continuation of Marie Curie into the next Framework Programme.

41. There is scope for rationalising the Marie Curie schemes to concentrate on those with the most added value. The sector urges BIS to call on the Commission to retain the flagship Marie Curie Actions (Initial Training Networks, Incoming International Fellowships, and Intra European Fellowships) without any significant change being made to them. The sector would be against any dilution of the flagship Marie Curie actions in favour of the more recent Cofund Scheme.

42. As set out in response to question A, the UK HE sector is concerned that the transfer of the Marie Curie Actions from the Commission's Directorate General for Research to its Directorate General for Education and Culture may have implications for its continuation as part of the next Framework Programme. Marie Curie funds high quality *research*, albeit with a training and mobility focus, and positioning it as removed from the Framework Programme could compromise the European added value of Marie Curie for EU researchers.

Q22 What should be the relative priority for the Joint Research Centre under FP8? On which activities should it focus?

43. The UK HE sector is supportive of the Joint Research Centre as a scientific and technical centre of reference for the Directorates General of the European Commission. The JRC's first priority should be to continue to support the work of the Commission.

Q23 Please comment on the COST framework and its links with the Framework Programme.

44. The COST framework is popular among those HEIs in the UK that have had contact with it. COST funds important bottom-up networking activities that often lead to the initiation of new Framework Programme projects. It is viewed as highly successful at encouraging the development of connections at the EU level, and many UK

academics feel that the links developed through COST between early career researchers are valuable and long-lasting.

45. The current status of COST as a partially detached part of the Framework Programme strikes many UK HEIs as inefficient and unnecessary. There is a general feeling across the sector that COST could be easily absorbed into the thematic priority areas of the Framework Programme, potentially as a suite of Networks of Excellence.

Q24 Should FP8 directly support activities aimed at integrating the three sides of the knowledge triangle e.g. KICs?

46. There is concern among UK HEIs that the current economic climate may increase pressure to draw together key funding streams currently outside the Framework Programme, such as the EIT's Knowledge and Innovation Communities (KICs), under the umbrella of the next Framework Programme. While a strong argument exists for the increased strategic coordination of a currently fragmented EU research landscape, it is crucial that measures to increase strategic coherence do not divert funding available for mainstream Framework Programme research activity, specifically collaborative research and frontier research undertaken with support from the ERC.

47. The UK HE sector does not object to allowing KICs to bid for Framework Programme funding. However, the sector is strongly against a system of preferential allocation of Framework Programme funding to KICs ahead of other Framework Programme consortia. The criteria for allocation of Framework Programme funding must be the same for both KICs and 'traditional' Framework Programme consortia.

48. One way to take this forward would be for the Commission to carry out an inventory of instruments and initiatives, to ensure that those taken forward to the next Framework Programme are fit-for-purpose. Further, it may be appropriate to look at education programmes alongside this, so that all three elements of the knowledge triangle – research innovation and education – fit together.

Q25 Which instruments (e.g. JTIs, article 185 initiatives) should be retained for FP8? Are any new instruments required?

49. It will be important to ensure that recent progress by the Commission in acknowledging the scale of the bureaucratic complexity of the Framework Programme is not reversed by the introductions of new funding instruments and measures to embed innovation within the next Programme. The sector urges BIS to call on the Commission to adapt, where possible, existing funding instruments before introducing new ones.

50. As outlined in response to Question 24, one way to take this forward would be for the Commission to carry out an inventory of instruments and initiatives, to ensure that those taken forward to the next Framework Programme are fit for purpose.

51. The UK HE sector is concerned that the current funding and reimbursement arrangements for participating in some Joint Technology Initiatives (JTIs) is dissuading UK HEIs and researchers from participating. It is crucial that those instruments retained for FP8 are subject to sustainable funding and reimbursement mechanisms.

Q27 What should be the balance between funding large-scale programmes eg. The article 185 programmes above smaller projects individually administered by the Commission?

52. As outlined in answer to Question 13, in the light of the evolving Grand Challenges agenda, the UK HE sector is concerned that smaller research actors may increasingly become excluded from the bidding process and effectively be disenfranchised, thus undermining the creation of the ERA. One option would be to ear-mark funding within the next Framework Programme for smaller projects.

Q 29 What lessons from evaluations of previous Framework Programmes can help with the development of FP8?

53. Past evaluations have indicated that organisations are frustrated by the administrative burden associated with the Framework Programmes. The fact that it has been necessary to address this issue again in the present period has led to concern among UK HEIs that recent measures to bring about the simplification of the Framework Programme will not result in a real reduction in the administrative burden. UK HEIs call upon the Commission to bring about a step change in efforts to simplify the Framework Programme by moving towards an administrative system based on trust (see response to Question 33 for more on this point).

Q30 What steps could be taken to ensure that knowledge gained from FP8 is disseminated and exploited – and remains easily accessible over time?

54. At present knowledge dissemination approaches occur primarily in an ad-hoc manner at the level of individual projects. Most UK HEIs agree that an overarching Commission strategy in this area would be a welcome development.

55. One common suggestion is that the Commission should only grant Framework Programme funding where a coherent dissemination and exploitation plan has been included in the application. However, the nature of research is such that it is not always possible to determine in advance the best way to go about the exploitation of research results. As such, potential beneficiaries of the Framework Programme should be able to demonstrate an awareness of appropriate dissemination and exploitation strategies, according to the range of probable research outcomes.

56. The UK HE sector is supportive of the recent establishment by the European Commission of an open access infrastructure for the European Union (OPENAIRE). It is likely that the next Framework Programme will benefit substantially from this.

57. The UK has a wealth of experience in the exploitation of research activities, such as the 'follow-on fund' for Framework Programme projects pioneered by the Engineering and Physical Sciences Research Council (EPSRC).[2] EU activities to encourage such developments are welcome, and should build upon and be informed by the valuable experience the UK has to offer in this area.

Q31 Would any proactive effort to alter the current balance of funding between universities, research organisations and businesses be appropriate or effective? If so, what might be involved?

58. The majority of UK HEIs support increased efforts to incentivise UK industry to participate more fully in the Framework Programme, in particular through increased levels of collaboration with HEIs. This could be facilitated by the simplification of application processes, shorter contract negotiation times, and a reduced administrative burden. There is a role for UK HEIs in collaborating with industry to share expertise and knowledge about how best to engage with the various funding programmes.

59. With regard to proactive effort to alter the current balance of Framework Programme funding, the UK HE sector feels it is important to ensure that no rigid quotas are introduced, so as to allow the principle of competition to continue to underpin the Framework Programme.

60. Efforts to incentivise UK industry to participate more fully in the Framework Programme need not lead to a corresponding reduction in participation by UK universities, which have been highly successful in securing funds under successive Framework Programmes. Rather, the objective should be to increase the overall proportion of the Framework Programme budget secured by the UK, relative to its nearest competitors (Germany and France).

61. The responses to Question 32 are also directly relevant to Question 31.

[2] For more information on the 'follow-on fund', visit http://www.epsrc.ac.uk/funding/grants/business/schemes/Pages/followonfund.aspx

Q32 What could be done at EU level to encourage more businesses – especially SMEs – to apply?

62. The complex administrative arrangements of the current Framework Programme and the excessive timescales for decision-making by the Commission have acted as disincentives for SME involvement. As such, reducing the administrative requirements for bidding under the Framework Programme would help to encourage SME involvement.

63. SME participation in Framework programme projects is most often not as a full partner but as a sub-contractor. SME contribution is often via the provision of specialist services necessary to the wider work of the project. It should be taken into account that for many SMEs, interest in new knowledge, technology and innovation occurs further downstream, where outputs are closer to the market. It follows that consideration needs to be given to the balance between concentrating new resources on encouraging SME participation in RTD projects, and support that can encourage participation in the development and commercialisation of the results of RTD projects.

Q33 What could the Commission do to reduce bureaucracy of FP8 over and above the current simplification proposals (including changes to the Financial Regulations and Implementing Rules)?

64. The UK HE sector welcomes the importance assigned by the Commission to simplification of the Framework Programme. The Commission should ensure that its activity in this area will result in *real* simplification for beneficiaries.

65. The Commission should take steps to ensure that under the next Framework Programme there is a higher level of consistency in the application of rules across schemes, programmes, DG units and Directorates General themselves. This could be facilitated by ensuring the standardisation of some aspects of training for project officers, financial officers and auditors, to bring about greater uniformity of advice and information offered by Commission officers working on the Framework Programme.

66. Other suggested simplification measures widely cited by UK HEIs include:

- extension of the Unique Registration Facility and Participant Portal to all programmes;
- avoiding the use of Coordinating Actions and Collaborative Projects in the same project;
- while the Commission has taken steps towards the use of technology to simplify administrative processes within the Framework Programme, there is scope for greater/improved use of electronic tools and systems, for example through the introduction of electronic signature documents, grant agreements and reports; and
- the introduction of a transparent mediation service for disputes of interpretation.

Development of a trust-based system

67. The UK HE sector acknowledges the importance of the work done by the Commission in centrally regulating the administrative dimensions of Framework

Programme projects. At the same time, however, public and political attitudes towards accountability and regulation vary considerably through time and across the EU, and are at present high on the agenda in a number of member states. The Better Regulation in Higher Education Group in the UK, for example, is engaged in updating voluntary national HE frameworks, mapping the emerging accountability and regulatory framework for HE, and supporting engagement between the HE sector and national regulatory bodies such as the higher education funding councils. The continuation of highly centralised administration by the Commission could lead to the regulation of Framework Programme activity becoming detached from and out-of-step with the important advances in regulatory practice being made at the national level across the EU.

68. The next Framework Programme presents an opportunity for the Commission to take steps towards a more trust-based system in which nationally approved certification, accounting and management practices are accepted. The UK HE sector would be strongly supportive of such a measure, which would contribute substantially towards simplification of the Framework Programme by reducing centralised bureaucracy. It would also enable the Framework Programme to benefit from simplifications embedded within national systems, such as the increased use of national certification systems.

69. An important part of any move towards trust-based certification and management practices within the next Framework Programme would be the increased recognition of the practices and methods operated within individual HEIs. The UK HE sector urges BIS to call on the Commission to take advantage of the next Framework Programme to instigate a number of practical steps to increase recognition of 'own practices'. One option would be to substantially simplify the Certificate of Methodology and expand it so that, rather than being only a validation of overhead use, it could become a certification for the institution as a whole. This would allow the Commission to ratify institutions on a trust basis.

70. Further suggestions commonly cited by UK HEIs include:

- the recognition of full costing methodologies, where these are nationally accepted and quality assured; and
- the reduction of reporting requirements from the current requirement to repeat the content of previous reports, to concentrate instead on progress since the last report and deviations from the project plan.

Q34 Is there a role for a two-stage application process analogous to that used by the Technology Strategy Board?

71. A two-stage application process could offer the possibility of filtering out projects that do not demonstrate rigorous scientific quality. However, it is crucial that any move towards a two-stage process does not create an additional level of bureaucracy.

Q35 Should the programme move away from a cost/input-based funding model to one based more on results/outcomes/performance?

72. UK HEIs are concerned that any move to a results-based funding regime may deter risky research such as that encouraged by the European Research Council. A system based on payment against objective milestones could also lead to quality control issues, for example around a publishing objective where worse than expected results lead to a weaker paper. There is also concern that a focus on objectives and outcomes may increase the levels of reporting required, precisely at a time when a reduced institutional reporting burden in the next Framework Programme is a priority objective for UK HEIs.

Q37 Is the proportion of overheads funded by FP7 appropriate? Should this be adapted in FP8 to create more consistency with other sources of funding?

73. UK HEIs derive major non-financial benefits from participating in the Framework Programmes, and these benefits encourage participation in shared-cost programmes. However, a key challenge for the next Framework Programme is the extent to which funding mechanisms support and reinforce the move in European HEIs towards identifying their full costs and achieving greater financial sustainability.

74. For example, the UK HE sector is concerned that the current funding and reimbursement arrangements for participation in some Joint Technology Initiatives (JTIs) and the wider Framework Programme could dissuade UK HEIs and researchers from participating.

75. By using a sector-wide Transparent Approach to Costing (TRAC), UK HEIs have accumulated experience of identifying and calculating the full costs of their activities[3]. The UK HE sector will work with other countries, the European University Association EUA, and the European Commission to advance the case for full costing, improved recovery and sustainability of funding from the Framework Programme and other research activities. This is the only way to secure long-term commitment to European research activity and guarantee its sustainability.

76. Universities UK would be happy to provide further information on the development of TRAC for use in EU Framework Programmes.

77. Flat rate and lump sum options can be useful in particular circumstances, and should be increased in size under the next Framework Programme to reflect actual project costs more realistically. However, flat rate and lump sum options should be retained on an optional basis, and should not be mandatory.

[3] Transparent Approach to Costing (TRAC), http://www.hefce.ac.uk/finance/fundinghe/trac/

Q38 Within the current UK public expenditure constraints, could the UK do more on a cost-neutral basis to encourage participation in FP generally? Q39 How effective are the current UK support services?

78. Research Council programmes do offer opportunities for synergy with EU programmes. For example, beneficiaries of Marie Curie awards often go on to receive Research Council or Royal Society fellowships. While support and information is available for subscribers to the UK Research Office, it would also be helpful if BIS and RCUK could make clear statements on where they see overlap and complementarity, and on how they see UK research fitting with the EU agenda.

Q42 Please add additional comments here in relation to UK interests in the Framework Programme.

Innovation

79. With the publication of the European Commission's Communication on Innovation Union and the accompanying 'European Innovation Partnerships' concept[4], it appears likely that the next Framework Programme will seek to couple the Programme's existing objective of bringing about the European Research Area with a new set of objectives orientated towards innovation.

80. This move towards innovation could potentially offer enormous opportunities for UK HEIs, such as new mechanisms for the more effective use of research results, leading to a greater level of impact. However, the Commission should take steps to ensure that the primary focus of the Framework Programme remains on research, and that any incorporation of innovation-based objectives into the next Framework Programme does not lead to the Programme becoming excessively complex and inaccessible.

81. The bringing together of ERA and innovation objectives under the umbrella of the next Framework Programme may involve the extension of the Programme to include instruments and initiatives currently external to it, such as the Competitiveness and Innovation Programme (CIP) and the European Institute for Innovation and Technology (EIT). UK HEIs have often voiced the concern that the European research landscape is overly fragmented, and recognises the potential benefits of measures to increase the strategic coherence of research instruments. However, it is crucial that the configuration of the next Framework Programme does not threaten either the integrity of individual instruments, or the amount of funding available for 'traditional' Framework Programme activity.

[4] For more on European Innovation Partnerships, see page eight of the Europe Unit's E Note on Innovation Union, available at http://www.europeunit.ac.uk/sites/europe_unit2/resources/E-2010-12_InnovationUnion.pdf

Joint Programming

82. National engagement with Joint Programming is gathering pace across the EU. While Joint Programming is intended to work on a variable geometry basis and the Framework Programme is not, it is highly likely that Joint Programming will play a significant role in the next Framework Programme. The UK HE sector acknowledges the potential advantages of achieving a critical mass of research efforts in particular specified areas.

83. The UK HE sector welcomes recent strategic developments such as the definition by the European Council of a clear set of criteria for the Joint Programming of research programmes. The convening of a High Level Group for Joint Programming, on which the UK HE sector is represented, and the ongoing development of framework conditions are also important. The UK HE sector calls on the European Commission to continue the increased level of communication with member states on Joint Programming, to include consultation and the timely provision of further information on the specific details of the Joint Programming process as it develops.

84. However, it is important that Joint Programming activity is not allowed to distort the priorities of national funding bodies, or dilute the funding national bodies have at their disposal. The UK HE sector calls upon the Commission to recognise that, in the context of the Framework Programme, Joint Programming may sometimes lead to a blurring of the lines between national and European research priorities. While the UK HE sector respects the Commission's stance that ultimate responsibility for Joint Programming should lie with the member states, it asks the Commission to take steps, in the development of the next Framework Programme, to ensure that clear lines of distinction are retained between research activity that takes place as part of a Joint Programming Initiative, and that which does not. This will help to ensure that the post-2013 Framework Programme is still perceived by potential beneficiaries as a source of funding for programmes/projects not supported at national level.

85. The UK HE sector recommends that a longer term 10-20 year perspective on Joint Programming is developed. This does not need to be binding, but will allow a strategic approach and clear underpinning principles to be articulated. The UK HE sector is likely to only participate in Joint Programming activities in areas where UK funding bodies, such as the UK Research Councils, are active.

Synergies between programmes

86. Differences in auditing requirements, legal wording and structure represent a major barrier to taking advantage of synergies between programmes. The UK HE sector is supportive of aspirations set out in the Commission's Innovation Union Communication to harmonise conditions between programmes.

87. The Commission could do more to clarify and facilitate synergies between the different funding streams. This would require better communication between the different parts of the Commission.

Addendum: Universities Scotland case study

Universities Scotland, representing the 20 Higher Education Institutions in Scotland, endorses the response of Universities UK and the International and Europe Unit. In particular Universities Scotland would like to draw attention to a specific feature of the Scottish research landscape, 'research pooling', which often helps our members and their researchers gain the high profile and critical mass necessary to participate in Framework Programmes; namely, research pooling.

The research pooling initiative was created by the Scottish Funding Council in 2003 to encourage researchers across Scottish higher education to pool their resources as a way of responding to increasing international competition. By concentrating investment on networks of excellence, this has created powerful, well resourced communities that are now attracting research talent from across the world. These dynamic collaborations between research departments can provide Scotland's universities with a competitive advantage which other countries would find difficult to replicate.

The research pools undertake basic and applied research, and most also aim to commercialise research in partnership with business.

The current Pooling initiatives are:

- Scottish Universities Physics Alliance (www.supa.ac.uk)
- ScotCHEM (Chemistry, www.scotchem.ac.uk)
- Edinburgh Research Partnership in Engineering and Mathematics (www.erp.ac.uk)
- Glasgow Research Partnership in Engineering (www.grpeng.ac.uk)
- Marine Alliance for Science & Technology for Scotland (www.masts.ac.uk)
- Northern Research Partnership in engineering (www.northscotland-research.ac.uk)
- Scottish Alliance for Geoscience, Environment and Society (www.sages.ac.uk)
- Scottish Institute for Research in Economics (www.sire.ac.uk)
- Scottish Universities Life Sciences Alliance (www.sulsa.ac.uk)
- Scottish Imaging Network: A Platform for Scientific Excellence (www.sinapse.ac.uk)
- Scottish Informatics and Computer Science Alliance (www.sicsa.ac.uk)
- Energy Technology Partnership (www.etp-scotland.ac.uk)

There are similar initiatives, including partners outside the university sector, in Applied Education Research, Nursing, Midwifery and Allied Health Professions Research, Criminal Justice, and Policing Research.

For further information on the Universities Scotland position on the future of the Framework Programme, please contact Dr Charles Marriot, Senior Policy Officer, Universities Scotland, at charles@universities-scotland.ac.uk

The UK Higher Education International and Europe Unit

The UK Higher Education International and Europe Unit (IEU) is a central observatory and intelligence unit on HE internationalisation and European policy developments for UK higher education institutions. The IEU works to support the development and sustainability of the UK HE sector's influence and competitiveness in a global environment and to represent the sector's distinctive strengths within Europe and internationally. It provides analysis on all aspects of HE internationalisation from international research collaboration to student recruitment to the various forms of 'transnational education' by which UK education is delivered overseas. The IEU supports and promotes the UK HE sector's engagement in European Union and Bologna Process policy debates.

www.europeunit.ac.uk www.international.ac.uk

Universities UK

Universities UK (UUK) is the major representative body and membership organisation for the higher education sector. Its members are the executive heads of UK universities. Together with Higher Education Wales and Universities Scotland, UUK works to advance the interests of universities and to spread good practice throughout the higher education sector.

www.universitiesuk.ac.uk