

Consultation on the second Research Excellence Framework

Page 1: Respondent details

Q1. Please indicate who you are responding on behalf of

Subject association or learned society

Please provide the name of your organisation

Arts and Humanities Alliance Professor Susan Bruce, Co-Chair Professor Martin Halliwell, Co-Chair

Page 2: Overall approach

Q2. 1. Do you have any comments on the proposal to maintain an overall continuity of approach with REF 2014, as outlined in paragraphs 10 and 23?

We are in favour of continuity with REF 2014 and are pleased with the decision to retain peer review at the heart of assessment. The desire to avoid burdening HEIs that underpins this approach is broadly welcomed. We anticipate that the changes proposed in the Stern report will nevertheless result in an overall increase in work, since the move to full staff return will probably outweigh the reduction caused by the lower average number of submissions per colleague.

Page 3: Unit of assessment structure

Q3. 2. What comments do you have about the unit of assessment structure in REF 2021?

Insofar as the arts and humanities subjects in Panel D are concerned, we think it important that REF 2021 entails no further amalgamation of panels.

Subpanels 25 and 36: There is widespread dissatisfaction with Music and Drama being combined in Subpanel 25. The results should be disaggregated either at national/REF or institutional level. The same applies to Museum Studies in Subpanel 36 – if this is retained then the name of this subpanel should be adjusted.

Subpanel 27: Area Studies should retain its own subpanel: work submitted to Subpanel 27 in REF 2014 could not have been assessed adequately by other Panel D subpanels. There are crucial distinctions between the outputs and impact work submitted to Subpanel 27 and Subpanel 28 (Modern Languages and Linguistics), and it is important to recognize that American Studies, African Studies and Chinese Studies (among others) were all submitted to Subpanel 27.

Subpanel 28: We note with concern that Portuguese and Brazilian Studies was underrepresented on Subpanel 28 in REF2014. The subsequent appointment of an assessor in Portuguese ensured relevant expertise in the evaluation of outputs, but full membership would extend expert input more broadly.

Subpanel 17: In Panel C, Archaeology and Geography should have their own subpanels, rather than being combined in the same subpanel. Combining Geography and Archaeology in a single panel in REF2014 created more work than would have been incurred by retaining separate panels. Furthermore, comparisons with RAE 2001 and 2008 show that environment scores for Archaeology were distorted in REF2014 by the smaller average size of Archaeology departments compared to Geography.

We strongly believe that cross-panel referral for interdisciplinary work should be encouraged.

Page 4: Expert panels

Q4. 3a. Do you agree that the submissions guidance and panel criteria should be developed simultaneously?

No

Comments:

Absolutely not. See 3b.

Q5. 3b. Do you support the later appointment of sub-panel members, near to the start of the assessment year?

No

Comments:

It is essential that full subpanels should be actively involved in the drawing up and agreeing of subpanel criteria to capture the full range, depth and granularity of the distinct research fields. Consultation by a panel chair falls far short of a working panel which (i) has the confidence of the community, (ii) has appropriate representation across a range of subjects and institutions, and (iii) can draw upon the experience of a group of subpanellists who served for the first time in REF2014. This is particularly pertinent in any subpanel which may incorporate more than one constituency. In Subpanel 28, for example, the Chair will inevitably be drawn from one of two distinct constituencies, Modern Languages or Linguistics, and would neither have, nor be perceived to have, full knowledge of or sensitivity to issues pertinent to the constituency of which s/he is not a member. 'Consulting the subject community' would pose insuperable difficulties in the field of Modern Languages where there is no dominant single association that could speak for the community, since each language has its own subject association (or associations), differing enormously in size and in remit. Historians need to ensure expertise in several sub-fields, for instance, quantitative methods and languages. For planning purposes, panel and subpanel members will need to give their HEIs time to adjust workloads. This was a problem for the output assessors who were added late in the process to the History and English subpanels in REF2014 and must be avoided in REF2021. This may be particularly important for colleagues in more teaching-intensive institutions and hence, if adopted, may impact on the diversity of panels. If appointment of sub-panel members is delayed, training in Equal Opportunity matters may be reduced. Historically, matters such as provision for reduced outputs to take account of, inter alia matters such as maternity leaves have happened relatively late in the process; moreover, late appointment of sub-panel members reduces the time available to seek panel members of under-represented groups where that is necessary.

Q6. 4. Do you agree with the proposed measures outlined at paragraph 35 for improving representativeness on the panels?

Yes

Comments:

Yes, but with reservations. The proposals to enhance equalities and diversity may not be robust enough to ensure better representation. We would suggest that main and subpanel chairs be given a target for panel member representation benchmarked against the statistics for disciplines utilised for parallel processes such as, inter alia, Athena SWAN.

Q7. 5a. Based on the options described at paragraphs 36 to 38 what approach do you think should be taken to nominating panel members?

We believe the best approach to take is continuous with REF2014: i.e. that major subject associations should be invited to put forward nominations after consulting widely in their subject area(s) and then for subpanel chairs to select from a list of nominees, with license to seek additional nominations where necessary to ensure coverage of specialisation, and in view of equalities and diversity considerations.

Q7. 5a. Based on the options described at paragraphs 36 to 38 what approach do you think should be taken to nominating panel members?

To be eligible to nominate a scholarly association or society should have a clear Equalities and Diversity statement, but we believe that this should not become an additional burdensome bureaucratic layer (indeed, the process should avoid burdens where at all possible). Where subpanels are permitted to include additional 'output assessors' at a later stage in the process, as was the case for REF 2014, subpanel chairs should be expected to address Equality and Diversity issues as well as appropriate subject and institutional coverage. Representation should also ensure that diversity across the university sector is taken into consideration.

We think that neither institutional nor mission group nomination should be permitted. Self-nomination should only be invited in cases where subpanel chairs have been unable to constitute E&D balanced panels from nominees nominated by scholarly associations and learned societies. We strongly recommend that REF2021 adopts the 'two sub-panel principle' utilised by many subpanels in 2008 and 2014, whereby half the subpanel members are retained to serve in the next exercise. This is important as it will provide continuity between the exercises and afford the opportunity to share experience with new subpanelists.

It is not clear from the consultation document if 'users' will be attached to REF2021 subpanels for impact assessment, as was the case in REF2014. Without guidance about users, panels and subpanels will not have robust processes in place.

Q8. 5b. Do you agree with the proposal to require nominating bodies to provide equality and diversity information?

Yes

Comments:

Yes – see the response to question 5a. However, many nominating bodies would find it difficult to provide E&D membership characteristics in the manner anticipated by the consultation document. Some subject associations have memberships composed of departments, not individuals.

Q9. 6. Please comment on any additions or amendments to the list of nominating bodies, provided alongside the consultation document.

We believe that the Arts and Humanities Alliance (representing over 50 arts and humanities scholarly associations) should be a nominating body, as should Black British History Education Project; Imperial War Museum (Research Department); British Association of South Asian Studies; Black and Asian Studies Association.

University English is the new title of the Council for College and University English, so this should be amended on the list of nominating bodies.

Page 5: Staff

Q10. 7. Do you have any comments on the proposal to use HESA cost centres to map research-active staff to UOAs and are there any alternative approaches that should be considered?

HESA data is not of sufficient accuracy to provide the necessary precision to carry the confidence of the subject communities. It is particularly unhelpful in identifying cross-departmental and interdisciplinary research areas of the sort that the REF2021 exercise is anxious to capture and encourage. Staff may do teaching in one HESA area and research in another, so HEIs will need to choose where to submit them. Moreover, the proposal raises particular difficulties for staff in post -92 HEIs, which we elaborate further in 8 below.

Q10. 7. Do you have any comments on the proposal to use HESA cost centres to map research-active staff to UOAs and are there any alternative approaches that should be considered?

We suggest that HEIs should be required to provide an explanation of relationship between their choice of UoAs and HESA cost centres.

We note that for disciplines such as Creative Writing, Museum Studies and some Area Studies units, HESA data is not helpful or precise. No HESA cost centre can be reliably assigned to Linguistics, while historians frequently find themselves in Business Schools or Languages or Area Studies departments. HESA data is inhospitable to interdisciplinarity.

Q11. 8. What comments do you have on the proposed definition of 'research-active' staff described in paragraph 43?

We agree with the proposal that all research-active staff should be submitted and we applaud the desire to reduce divisiveness. However, we are concerned that using the HESA codes of 'research only' and 'teaching and research' may encourage institutions to attempt to move some academic staff to teaching-only contracts as suggested in paragraph 44.

The proposed definition of research-active staff using HESA activity codes is too blunt a tool to distinguish research-active staff and capture the variations in practice across the sector. Many staff in post-92 universities fall into the 'teaching and research' category but have contracted duties which do not allot time for the production of research outputs; such staff may, however, be in the process of being developed as researchers, returning to research after a career break, or undertaking research to inform teaching. Combined with a minimum requirement of 1 item per individual (cf. 9c), the use of these codes would force the reclassification of many staff and/or prolonged contract negotiations. This would be a major unintended consequence.

This would have attendant cost implications. It would be hugely divisive. It would militate against the development of more research-rich environments by imposing a drastic split between research and teaching, a split that was not envisioned by Stern, and which would be hugely detrimental to Arts and Humanities disciplines, for whom that intrinsic connection is fundamental. It would damage morale, and impact upon a unit's capacity to provide research-informed teaching (including research into pedagogy). It might entail equal opportunity consequences, as those most likely to be disadvantaged in this way would be staff with caring responsibilities.

The proposal that 'a measure of independence be also included in the definition of research-active staff' may help to discourage HEIs from attempting proactively to reclassify staff in this manner, but inadequate detail is afforded in the document on what this 'measure of independence' would be (or how widely it might extend).

The suggestion that HESA data might be used to identify shifts in employment patterns over time might helpfully curtail an HEI's appetite for contractual amendments. We suggest that if such a practice is adopted, E&D considerations be explicitly signalled in data reporting arrangements (i.e. reclassifications broken down by protected characteristics). We also suggest that submitting units be required to provide a full list of their staff, regardless of type of contract, so that assessors can judge the depth of the research culture.

Q12. 9a. The proposal to require an average of two outputs per full-time equivalent staff returned?

An average of 2 outputs, while designed primarily to avoid any increase in the burden on panels, is workable. An average of 2 will better nurture production of high-quality, long projects, but conversely, may skew submissions to such outputs at the expense of other, shorter, output forms. If the average of 2 outputs per FTE over the assessment period is used, it is essential that clear guidelines are given, and rules established, to ensure that the resulting submission reflects the real extent of the research activity in the submitting UoA in that period. The total number of outputs required from a UoA should be reduced to take account of ECRs and those returning from parental and other forms of long-term leave.

We would not want the financial baseline to be at the 4* level because 3* activity also needs to be rewarded for its intrinsic excellence. The migration of finances to these higher reaches would be

Q12. 9a. The proposal to require an average of two outputs per full-time equivalent staff returned?

deleterious to the research community and have unintended consequences on the self-confidence and careers of many researchers, and perhaps especially on Early Career Researchers.

Q13. 9b. The maximum number of outputs for each staff member?

In Arts and Humanities disciplines (Panel D and some parts of Panel C) this seems a reasonable upper limit. We are assuming that 6 is the FTE maximum, and that the figure will be pro rata for individuals on fractional contracts. However, some of our members think that 4 should be the maximum number, better to ensure an even distribution of responsibility across a UoA.

Q14. 9c. Setting a minimum requirement of one for each staff member?

It is not unreasonable to expect research active individuals to produce 1 output of REFable quality over the course of seven years of funded research. However, some of our members have expressed the firm view that the minimum be zero; others have articulated the concern that the combination of 100% return of staff deemed research active and a minimum requirement of 1 output per FTE staff member may be more likely to result in institutions attempting pro-actively to move staff onto teaching-only contracts than would a requirement of 0.

Accordingly, if 1 is the chosen minimum, it is essential that consideration is given to exemptions: for instance, to those on fractional contracts, or with particular circumstances, such as significant periods of illness, maternity, caring responsibilities, etc. In such cases, 0 should be permitted.

Q15. 10a. Is acceptance for publication a suitable marker to identify outputs that an institution can submit and how would this apply across different output types?

No. Using the date of acceptance as the point of census is likely to give rise to multiple challenges and complications – as is the recommendation that outputs be shared between different HEIs. The date of first publication would be a less complicated marker. However, some outputs (for instance exhibitions, performances etc) do not have publication dates.

Q16. 10b. What challenges would your institution face in verifying the eligibility of outputs?

There should be a full range of criteria for all potential outputs including performances, software, and all varieties of output covered by REF 2014. REF 2014 will have resolved most of the issues around verifying the eligibility of outputs, but questions may still remain around some creative output genres.

Q17. 10c. Would non-portability have a negative impact on certain groups and how might this be mitigated?

We believe non-portability would have a negative impact on the subject community, and on academics at all stages of career, from ECR to late career researchers. We understand the general principle, and why it has been proposed: non-portability would ensure the work of senior scholars is returned by the HEIs that funded that research. However, wealthier HEIs with the resources to offer lucrative retention packages to hold staff could benefit unduly; while in other institutions we have canvassed academic staff could be stuck there for their whole career, possibly in unhappy circumstances. We note that mobility of ECRs is an important criteria for international funding schemes such as the ERC. Non-portability discourages the ambitions of individuals and the need of units to nurture them. For all these reasons we argue that portability should be permitted up to 12 months of the REF census.

If the REF want to bring in non-portability it has to be before the beginning of a REF research cycle in order that institutions can hire and retain staff based on agreed national criteria.

Q18. 10d. What comments do you have on sharing outputs proportionally across institutions?

In principle this seems to be a good idea, but in practice it is likely to be difficult to administer, especially in the case of long-form outputs which may have been researched over many years, and in several institutions.

Will the number of outputs an individual puts forward be increased if they have two or more institutions to return to? And what are the implications for environment statements?

Q19. 11. Do you support the introduction of a mandatory requirement for the Open Researcher and Contributor ID to be used as the staff identifier, in the event that information about individual staff members continues to be collected in REF 2021?

No

Comments:

Yes, in the long term, but not for REF2021. Many smaller journals do not yet carry ORCID identifiers.

Q20. 12. What comments do you have on the proposal to remove Category C as a category of eligible staff?

This seems to be a sensible proposal.

Q21. 13. What comments do you have on the definition of research assistants?

A clearer definition will be helpful.

Q22. 14. What comments do you have on the proposal for staff on fractional contracts and is a minimum of 0.2 FTE appropriate?

We agree with the 0.2 FTE minimum. We agree with the requirement of a short statement outlining the connection of such staff to the submitting unit.

Page 6: Collaboration

Q23. 15. What are your comments in relation to better supporting collaboration between academia and organisations beyond higher education in REF 2021?

We strongly believe that there should not be any 'value-added' for UoAs who are better equipped to support collaborations of this kind than others. The increasing emphasis on collaboration needs to be regarded with some caution. Badly handled, it may threaten theoretical research in fields such as in Philosophy and Linguistics.

Page 7: Outputs

Q24. 16. Do you agree with the proposal to allow the submission of a reserve output in cases where the publication of the preferred output will post-date the submission deadline?

Yes

Comments:

Yes. The practice adopted in REF2014 should be continued.

Q25. 17. What are your comments in relation to the assessment of interdisciplinary research in REF 2021?

The idea that a single champion or interdisciplinary assessment panel can assess and promote interdisciplinarity is misguided. REF panels and subpanels are intended to match fields of research; interdisciplinarity is not a field of research. Instead, interdisciplinarity should be recognized by all subpanels.

We suggest that each panel appoints some members with a proven record of interdisciplinary working: this is particularly important in the case of American Studies as interdisciplinary work in this field was submitted to five subpanels in REF2014 (Subpanels 21, 27, 29, 30, 36) and for Linguistics that cut across six subject areas (including Psychology).

Cross-referral between subpanels remains necessary, and should remain part of REF2021, although it needs to be carefully managed so that the workload is not significant for any single subpanel.

Q26. 18. Do you agree with the proposal for using quantitative data to inform the assessment of outputs, where considered appropriate for the discipline? If you agree, have you any suggestions for data that could be provided to the panels at output and aggregate level?

Yes

Comments:

We applaud the fact that peer review remains the primary approach to assessment and agree that the use of appropriate metrics should be determined at sub-panel level, so long as metrics remain subordinate to peer review. . We regard quantitative data to be acceptable only when it is considered appropriate for all sub-groups within a submission to a sub-panel and when it does not discriminate against other sub-groups. We would be very concerned were there to be any attempt to standardise practice in the field of metrics; it would reduce the confidence of the sector in the rigour and value of the REF exercise. We note that bibliometrics are almost exclusively Anglocentric, and so have a disproportionately negative impact on Modern Languages. We must continue to encourage and support researchers to publish in languages other than English.

Page 8: Impact

Q27. 19. Do you agree with the proposal to maintain consistency where possible with the REF 2014 impact assessment process?

Yes

Comments:

Yes, this is important.

Q28. 20. What comments do you have on the recommendation to broaden and deepen the definition of impact?

We welcome the broadening of the definition of impact but request that clear guidelines regarding the nature and scope of the changes be issued early in the process. We especially value the broadening of the definition to include academic impact, research-led teaching, and public engagement, including media work. We recommend clear guidance be given on the scope and nature of the ways that both will be assessed.

Q29. 21. Do you agree with the proposal for the funding bodies and Research Councils UK to align their definition of academic and wider impact?

Yes

If yes, what comments do you have on the proposed definitions?

Academic impact: add: 'pedagogy' and 'curricula' The constituent terms ('economy, society, culture' etc) should be listed alphabetically ('culture, economy, environment' etc) so as not unconsciously to privilege any particular realm of impact. It would be beneficial if REF and the research councils could align their definition of 'early career'.

Q30. 22. What comments do you have on the criteria of reach and significance?

The definitions provided in REF2014 worked effectively and we recommend that these criteria are retained for REF2021. Some respondents, however, have expressed a desire that the term 'reach' be replaced by 'depth', since it is more hospitable to local impact.

Q31. 23. What do you think about having further guidance for public engagement impacts and what do you think would be helpful?

Definitional guidance early in the process is required on:
'public engagement',
'outreach',
'knowledge exchange'
'knowledge transfer'.

We support maintaining explicit inclusion of public engagement work on endangered languages and with the communities that speak them.

Of particular use would be a digest of high-scoring 2014 impacts; and indications of forms of evidence that were judged to be convincing or unconvincing in REF 2014.

Q32. 24. Do you agree with the proposal that impacts should remain eligible for submission by the institution or institutions in which the underpinning research has been conducted?

Yes

Comments:

Yes, in principle, but in practice this may be problematic should the recommendation that impact be linked to 'a research activity/ body of work' be adopted.

Q33. 25. Do you agree that the approach to supporting and enabling impact should be captured as an explicit section of the environment element of the assessment?

Yes

Comments:

We agree with this proposal. Additional space must be provided within the revised environment template for enough meaningful, and evidence-based, detail to be given. Guidance should be provided to ensure the statement is evidence-based.

Q34. 26. What comments do you have on the suggested approaches to determining the required number of case studies? Are there alternative approaches that merit consideration?

We believe that there should not be significantly more case studies in REF 2021 than were required in REF 2014. A loosening of the rigid numerical relationship between staff and case studies would be welcome, especially in the case of small units. If institutional level case studies are to be submitted, this should lead to a reduction in the number required from individual UoAs. Again this requires early guidance.

We note that small units that may only be required to submit one case study will be able to link a particular grade profile to an individual. REF need to think carefully about this as staff generating impact case studies for larger UoAs should not be disadvantaged. Conversely, a weaker case study from a small unit that only submits a single case study could have a very negative impact on the career prospects of that member of staff.

We agree with Lord Stern that there should not be significantly more case studies in REF 2021 than were required in REF 2014. However, we do not believe that HESA data are a good proxy for research activity. For the purposes of assessing requisite impact case study numbers HESA data may serve, but if it is used, some appeal process should be available for units whose research activity (and hence numbers of case studies required) may be inflated by the use of HESA data.

Q35. 27. Do you agree with the proposal to include a number of mandatory fields in the impact case study template to support the assessment and audit process better (paragraph 96)?

Yes

Comments:

Yes. In particular, E&D data, as some members believe that E&D considerations were particularly problematic in respect to impact submissions.

Q36. 28. What comments do you have on the inclusion of further optional fields in the impact case study template?

We don't believe that further optional fields are required as these are likely to prejudice the assessors from the intrinsic merit of the impact case study.

If such information is sought because it will be useful after the end of the exercise, than it should be gathered in a form which does not go to the panels. That kind of process happens all the time (for instance, with equal ops forms on job applications, which do not go to appointing panels). It is not that difficult to do, a fact which is widely understood. So if further optional fields, such as funding bodies, are required on a template which is to go to the panel, people will draw their own conclusions, and assume that impact will score better if it derives from (say) RCUK-funded research. That will have all sorts of knock-on effects for which case studies get nurtured in future and which ones don't.

Q37. 29. What comments do you have in relation to the inclusion of examples of impact arising from research activity and bodies of work, as well as from specific research outputs?

We would welcome the inclusion of impact arising from research activity and bodies of work and agree that this would generate a far richer picture of the interface of academic research and the outside world.

Q38. 30. Do you agree with the proposed timeframe for the underpinning research activity (1 January 2000 - 31 December 2020)?

No

Comments:

If case studies from REF 2014 are to be resubmittable in REF 2021 (see question 33), all impact case studies, whether new or continuing, should be allowed to stem from underpinning research conducted since 1 January 1993. This is especially important given that this consultation posits the acceptance of new kinds of impact (academic, teaching, etc) which were not allowable last time.

Q39. 31. What are your views on the suggestion that the threshold criterion for underpinning research, research activity or a body of work should be based on standards of rigour? Do you have suggestions for how rigour could be assessed?

We believe that the threshold criteria of the equivalent of 2* seemed to work well in REF2014. The idea that rigour can be readily disambiguated from the other criteria of significance and originality in the assessment of research quality, and that it would be useful to attempt to do so in order to assess the impact of such research is fraught with difficulties. It would be much more sensible to retain the methodology of REF2014.

Q40. 32a. The suggestion to provide audit evidence to the panels?

If evidence is gathered it makes sense to have it available for subpanels to assess.

Q41. 32b. The development of guidelines for the use and standard of quantitative data as evidence for impact?

We welcome the development of guidelines on the use of quantitative data, but we do not wish to see a hierarchy of evidence or would want quantitative data to overwhelm text based narrative. Guidelines are welcome, but not standardisation of data, which would not help in the assessment of diversity.

Q42. 32c. Do you have any other comments on evidencing impacts in REF 2021?

No. But we would like clarity on whether users will be attached to subpanels as they were in REF2014. Standardised quantitative data has its place but should not replace free text narrative in evidencing impact. Experience suggests that narrative and quantitative data helpfully complement each other.

Q43. 33. What are your views on the issues and rules around submitting examples of impact in REF 2021 that were returned in REF 2014?

Case studies submitted in REF2014 that are still producing demonstrable new impact should be submittable in REF2021 as part of a balanced portfolio of case studies. REF2021 should not bar the assessment of genuine impact created by research in the period or insist that such case studies need to be substantially different from the REF2014 submission.

Q43. 33. What are your views on the issues and rules around submitting examples of impact in REF 2021 that were returned in REF 2014?

An extra section within the template should be provided to allow a summary of earlier impacts and evidence in order clearly to distinguish subsequent evidence.

Page 9: Environment

Q44. 34a. Do you agree with the proposal to change the structure of the environment template by introducing more quantitative data into this aspect of the assessment?

No

Comments:

We think that PGR completions and grant acquisition should be the two fundamental categories for informing environment assessment. Where a UoA shows progress from one REF cycle to the next it should not be penalised if it falls short of its peer HEI group. The use and value of quantitative data should be determined at subpanel level in order to reflect the needs and practices of the disciplines concerned, with the exception of Equality and Diversity data, which should be applied consistently across all panels and subpanels.

Q45. 34b. Do you have suggestions of data already held by institutions that would provide panels with a valuable insight into the research environment?

The following have been suggested by our members:

- Research leave provision
- Individual research funds
- Library spend per discipline
- Workload models for T&R staff
- Research postgraduate and ECR support and facilities
- Equalities and Diversity policies of UoA
- Equalities Charter levels

Q46. 35. Do you have any comment on the ways in which the environment element can give more recognition to universities' collaboration beyond higher education?

Non-HEI partnerships where these are embedded (rather than superficial) should be highlighted, but so too should productive research relationships between HEIs: for example, as facilitated by membership of a research council DTP or CDT, often regionally.
One possible way to encourage this would be to reduce the submission of information relating to individual scholarly distinction (invited keynotes, plenary addresses etc) in favour of information on the UoA's contribution to the discipline and/or subject of enquiry as well as collaborations within and beyond academia.

Q47. 36. Do you agree with the proposals for providing additional credit to units for open access?

No

Comments:

No. If open-access is to be rewarded, clear guidelines and criteria need to be set out, in very good time, to describe how this will be assessed, by what criteria, and how it will be rewarded. Vague statements about 'additional reward' for UoAs going beyond the requirements for this activity should not be permitted. It is imperative in REF2021 and future REF exercises – and for the health of UK research – that articles

Q47. 36. Do you agree with the proposals for providing additional credit to units for open access?

published in international journals and monographs published by presses based in other countries are not penalised.

Q48. 37. What comments do you have on ways to incentivise units to share and manage their research data more effectively ?

More work needs to be done to demonstrate the benefits of sharing research data. The Concordat on Open Research Data is an important step in this roadmap towards open research data, acknowledging that it requires considerable efforts over the medium term.

It might be useful to include information on policies and practice around open data alongside those on open access. We suggest that this should be part of the institutional environment statement rather than at unit level.

Page 10: Institutional level assessment

Q49. 38. What are your views on the introduction of institutional level assessment of impact and environment?

We are concerned that the new 7.5% weighting for 'institutional' impact within each UoA will favour richer universities, flatten outcomes, lower the possibility of differentiation, and depress the final scores of exceptional small departments in less research-intensive universities. This is of particular concern for arts and humanities subjects, which can sometimes thrive despite, rather than because of, financial support from institutions. The planned cross-disciplinary submission required from institutions for the next REF already provides a measure of institutional research activity, making the additional 7.5% weighting unnecessary.

Some of our members do not support the introduction of institutional-level environment and impact statements at all, fearing that it would have unwelcome consequences for strong UoAs situated in relatively weak institutions.

Q50. 39. Do you have any comments on the factors that should be considered when piloting an institutional level assessment?

Any pilot must include an account of the resultant administrative burden of such a scheme. It should be representative of the HE landscape, including good representation from post-92 HEIs.

Page 11: Outcomes and weighting

Q51. 40. What comments do you have on the proposed approach to creating the overall quality profile for each submission?

We do not like the proposal mooted in paragraph 127 wherein institutional-level assessments of impact and environment are considered as two additional 'sub-profiles' when constructing the overall quality profile for each submission. We prefer the proposal articulated in paragraph 128 wherein the elements of the institutional-level assessment are considered separately.

Q52. 41. Given the proposal that the weighting for outputs remain at 65 per cent, do you agree that the overall weighting for impact should remain at 20 per cent?

Yes

Comments:

We would not want to see the weighting for outputs being any lower than 65 per cent. Impact weighting should remain at 20 per cent to ensure comparability with REF2014.

Q53. 42. Do you agree with the proposed split of the weightings between the institutional and submission level elements of impact and environment?

No

Comments:

We have concerns about the split between UoA and institution for both impact and environment. The allocation of 5% of the total return to institutional case studies seems very high given the untested nature of this aspect. We recommend that the institutional impact percentage be reduced, perhaps to 2.5%. We would suggest that the environment total is split 5% institutional and 10% UoA, to avoid giving too much weighting to a new aspect of REF.

Page 12: Proposed timetable for REF 2021

Q54. 43. What comments do you have on the proposed timetable for REF 2021?

It is essential the sub-panels are in place by late 2017/beginning of 2018 for the reasons given to question 3b. Early guidance in those areas of proposed change, such as portability, and minimum number of outputs is particularly critical to minimize uncertainty and job insecurity for early career staff.

Page 13: Other

Q55. 44. Are there proposals not referred to above, or captured in your response so far, that you feel should be considered? If so, what are they and what is the rationale for their inclusion?

1. If 'user' assessors are to be used again, HEFCE should consider paying its impact user assessors. This would improve the diversity and spread of user assessors.
2. Retaining the principle of double-weighting (for books etc.) is crucially important; the opportunity to triple-weight is recommended by some of our members
3. We note that there is no mention of multiple or joint submissions within the consultation and hope that this absence is merely a sign that these are not being considered for removal (and hence not requiring discussion), rather than a sign that they will no longer be allowed.
4. Not much is said in the consultation document about the international quality and impact of research. Nor is there any comment on the support for, contribution and impact of PGRs and ECRs on institutional and UoA research environments.
5. REF guidance should do all it can to encourage institutions to conduct their own audit of all protected characteristics (as defined by the Equality and Human Rights Commission).
6. Commitment to consistent and equitable application of exemptions, reductions etc through a centralised system, such as the equalities measures which informed REF 2014 (decision-making of this nature should not be left with individual HEIs). REF should include an E&D audit in relation to submitted staff, and should also record whether submitted staff are on fixed-term or open-ended contracts.

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Q56. If you would be happy to be contacted in the event of any follow-up questions, please provide a contact email address.

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