

March 2017

Question 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 agree with the proposal to maintain an overall continuity of approach with REF2014.

As we stated in our submission to the Stern Review, a key strength of REF is comparability between institutions, UoAs, and exercises. We would be wary of unnecessary tweaking of the parameters used in assessment or destabilising of the system. This would diminish the value of comparison and present institutions with additional burdens; radical changes will result in wasted investment as institutions have already begun preparations.

We further welcome the continued inclusion of impact. Impact was and is a positive development for small and specialist institutions that are embedded in regional knowledge economies and whose research tends towards the translational and applied ends of the spectrum; it has allowed a broader range of activities to be captured and rewarded. Such institutions rely on those just rewards to continue their excellent research activity which contributes to wider economic and societal benefits.

Therefore we embrace the intention of HEFCE and the other funding councils in avoiding the introduction of new aspects to the assessment framework that will increase burden.

Question 2: What comments do you have about the Unit of Assessment structure in REF 2021?

We would welcome as little change to the UoAs as possible to ensure comparison between exercises, and to reduce the burden on institutions who have systems in place which match their researchers and research groups to UoAs as they are currently configured.

For REF 2014 there was no separate sub-profile for outputs for the different areas but reference was made to these areas in the reports made to the HEIs. Subpanel reports also featured useful information on the state of each of the disciplines represented within the larger multidisciplinary subpanels. We would wish to ensure moving forward that helpful, productive feedback is given on different disciplinary areas while always ensuring that staff members working in small subdisciplinary fields are not exposed in ways that might make them vulnerable to institutional performance management.

Most units of Modern Languages have been operating on the basis that subpanel 28 will continue to embrace both Modern Languages and Linguistics. Any change to that structure at this stage would be destabilizing. We support, therefore, continuity in this respect. However, we feel strongly that representation of all relevant subject areas with appropriate critical mass should be represented on the subpanel as full members in order to guarantee the confidence of the academic community. For instance, Lusophone Studies was under-represented in REF 2014. 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 (to criteria-setting, to the evaluation of impact case studies etc.).

In particular, we welcome the approach in para28 which takes note of how interdisciplinary research will be considered across panels. As we argued in our submission to the Stern Review, practice-based research, interdisciplinary, and collaborative research rarely fit easily within the scope of a single UoA, and may therefore be assessed by panels unfamiliar with

the area being researched. The proposal to allow sub-panels to determine sub-profiles for outputs at the criteria-setting stage might go some way in addressing this.

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

We agree that the submissions guidance and panel criteria should be developed simultaneously. This will enable greater synergy between the two processes and could be more cost effective. However, we believe that more than just the sub-panel chair should be formally involved.

It may be desirable to have a number of subpanel members for the criteria setting phase, drawing on expertise from REF 2014. The experience of 2014 should be revisited and built upon. Did the REF 2014 criteria work? How can they be made better? What has changed in the field since that might require amendment to the criteria?

If there is to be genuine 'compatibility' between sub-panels and the main panels, then that comparison must be based on comparability of expertise – that is, on recognition of the equivalence of experts across different disciplinary areas. That means those experts should be given their due, and have a say in the forming of assessment criteria. To ensure expert equivalence requires the bespoke input of disciplinary and specialist expertise at the point of assessment (i.e. the sub panel level).

A calibration or consultation exercise with the more complete sub-panel could be carried out prior to release of the guidance and criteria. Additionally, this approach would mean that recruitment could take place in parallel with the development of the guidance and criteria.

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

We do not wholly support the later appointment of sub-panel members. The sub-panel members need to be appointed earlier in the process in order to inform and be engaged in developing the sub-panel criteria. They have a valuable and expert contribution to make and appointing the sub-panels after the criteria are established will reduce any sense of expert ownership of the criteria.

There is also a practical consideration to take into account - it might be difficult for colleagues taking on such a significant role with only a short time between appointment and the role beginning.

However, if the sub-panels' appointments are delayed, then, as stressed in the REF Manager's 2015 report, it will be *crucial* to have the informal involvement of the wider communities to ensure that the eventual sub-panel members have a sense of buy-in. An additional benefit to this approach may be that the informal consultation with communities actively involves a wider pool of people from a range of institutions than just the sub-panels.

An alternative would involve appointing a subpanel chair and deputy chair, as well as representation from other subdisciplines that may not be covered by the chair and deputy, to work on the criteria before a full subpanel is appointed.

It is also crucial that industry subpanel members are involved early in the process and feed into the development of the criteria. Likewise, in order to optimise the appointment of sufficiently credible (and senior) representatives of 'end-users' of research and impact, a

clear indication of the amount of time they will need to commit to the process, and adequate remuneration, need to be established at an early stage in the process.

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

We welcome the news that selection panels will continue to be appointed using open processes. We welcome the commitment that panel members will receive equality and diversity briefings and unconscious bias training. However, it is important that HEFCE clarifies who is delivering these, and that there is evidence that it was administered. Although we consider it a positive step that demographic data will now be collected, it would also be useful to know how this will be used constructively to improve the selection process.

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

We recognise the tension between the nominations approach used for REF2014 and the open nomination alternative. How do you balance the need for expertise with the desire to increase the diversity of a panel?

We would argue that there is the case for a more open nominations process. Selection however should be based upon ability, capability and expertise. Nominations should still be accepted and encouraged from academic associations and other bodies with an interest in research allowing for the expertise of the applicants to be commented on by bodies/organisations with experience of the applicants' competencies, skills and expertise in the required areas. The intervention of HEIs in the nominating process is not supported by our members.

However, given that there is a significant bias towards leading researchers being white men, it may potentially not have an effect on the representativeness of the candidate pool. This could be mitigated by opening up the process to emerging researchers, who are more likely to fit into more diverse representative groups. More targeting of underrepresented groups could be considered.

Another option is looking at reserving spaces on the panels for certain demographics (such as women or BME). This would guarantee that the panels would be more representative. However such a process would need careful management to ensure that the eventual appointments are not simply tokenistic.

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

We would agree with the proposal to require nominating bodies to provide some equality and diversity information but we would also want to ensure that this is nuanced, not burdensome and not be scaled to large organisations. It could be in the form of a statement about how E&D information has been taken into consideration. Such a statement could include where nominating organisations are involved with formally accredited equality and diversity training programmes, such as Investors in Diversity.

Question 6: *Please comment on any additions or amendments to the list of nominating bodies.*

As noted in the REF Manager's report (2015), there are over 2,000 organisations listed as nominating bodies and whose involvement greatly varies in how they engage with the REF. It would be beneficial to look at increasing engagement with the wide range of organisations, not least as this would aid the impact of research in the wider world.

This list certainly requires a major review; it includes bodies such as RDAs which no longer exist, and new bodies have been created since 2014 which should be included. In the light of the Brexit process, the number and scope of European organisations included should be considered. Not all relevant bodies which may be considered as learned societies are included. It would be helpful to publish criteria to be met by the nominating bodies to be included.

In addition, we would like to see the Creative Industries Federation listed as a nominating body.

Question 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 have significant concerns over the use of HESA cost centres to map research-active staff to UOAs. We do not think that these data currently give an accurate picture of research active staff. Currently most HESA data is collected on the basis of teaching, primarily, and it is difficult to discern the role of professional staff, researchers, and independent researchers such as post docs, in the UOA on the basis of HESA data as it currently stands.

For example, whilst certain subjects (Drama, Music, Dance) are in one cost centre, Media Studies is in another. There would need to be some attention paid to how cost centres correlate to the actual constitution of institutional research cultures. In the case of Media Studies and Design, it may well be worth considering aligning both more closely with drama, music and dance: film is frequently affiliated to drama departments, sharing both departmental infrastructure and resources, as well as methodological approaches – for example, in practice research.

Although some flexibility is possible, the use of HESA cost codes could create 'fences' within which researchers would reside for REF purposes – especially given their effective retrospective application. The philosophies of many of our members is precisely the opposite. As small universities with schools operating in related disciplines, we wish to break down fences when it comes to research. Though, in general, staff can be allocated to UoAs without much difficulty these will not always be the UoAs that would be determined by their school or main teaching activities.

Institutions could be enabled to assign research-active staff to particular UOAs as they see fit, without a system imposed outside. This would give institutions flexibility throughout the REF period to reflect real-world circumstances rather than creating artificial breaks. It is likely that by empowering institutions to make their own choices, this would reduce the instances of game-playing as there would be fewer rules to play with in the first place. Indeed, the REF Manager's report (2015) noted, "HEIs were able to apply the criteria consistently, as indicated by the very low rate of error we found when we carried out sample-based audits of staff eligibility."

If the funding councils wish to use HESA data, we would recommend that HEIs are given the opportunity, within the HESA system, to map academics onto UoAs i.e. to use the 'REF Unit of Assessment' field activated in the HESA return (Oct 2013 census date) prior to the REF2014 on an annual rather than REF-cycle basis.

This would be simple and effective, providing the funding bodies with annually updated information in a consistent format and providing HEIs with the flexibility they need to allocate academics to the UoA most appropriate to their research activity.

Question 8: What comments do you have on the proposed definition of 'research-active' staff?

We note that Stern used the word "significant" in relation to research-active staff. We feel that the question still remains on how this is implemented in practice.

If, as argued in question 7, institutions have flexibility to assign staff to particularly UoAs internally, then they could also have the option to define their "research-active" staff themselves, supported by guidance from HEFCE and the funding councils. In this case, the proposed definition of "research active" and HESA could be used as a cross-check to give an approximate total number of researchers at an institution over the period. Narrative would then be needed to explain any major changes in numbers over the period.

Potential issues with the current definition of "research active":

1. Contractual dilemmas

A substantial number of individuals on academic contracts, particularly in modern universities, in practice only have a minor responsibility for undertaking research and/or scholarship. If the result of the consultation will require all research staff to be submitted then institutions may need to alter their contracts accordingly so that the data accurately reflects the distribution of research, teaching, KE and professional practice, particularly in subjects that are industry-focused or vocational.

It should also be noted that the 'academic employment function' HESA marker is based on the description of the academic's role in the contract of employment rather than the actual activities undertaken.

2. Balance between teaching & research

In teaching-intensive universities, it would never have been intended that all staff with research in their contracts undertake REFable research (still less at the level that would be funded). Rather, it is expected that they contribute to the research environment. To dilute what might be small centres of excellence in such universities with large numbers of staff whose research focus is different from that of the REF would both distort the REF exercise and lead to a large amount of administrative time dealing with and assessing research that has absolutely no chance of getting funded.

3. Capturing applied research more fully

It is worth considering that some HEI staff who have come from industry contribute to the research and impact infrastructure through innovation and KE activities such as public performance and more applied, active research processes, without producing research outputs that might be submitted to REF. How might their contribution (in

view of the aspiration of encouraging greater collaboration with industry) be recognised and acknowledged?

Including such staff in REF submissions should only be done provided that they have the option of submitting zero outputs during the period (see following questions).

Should self-selection not be an option, then up to 25% of all FTE equivalent staff who have research in their contracts to be included in the UoA, but not to be included in the calculation of the number of outputs required and the ultimate average grading.

Question 9: *With regard to the issues raised in relation to decoupling staff and outputs, what comments do you have on:*

- a.** *the proposal to require an average of two outputs per full-time equivalent staff member returned?*

We welcome the proposal to require an average of two outputs per full-time equivalent staff member returned. We would not favour a sampling approach. As we argued in our submission to the Stern Review, decoupling outputs from individuals, and instead allowing institutions to select the best research from the whole cohort of individuals is an attractive proposition. It would allow a more coherent assessment of quality across research areas, and enable all researchers to potentially contribute. The current link to individual researchers has a potential reputational consequence for younger and newer researchers and research groups. They may be excluded from the submission in deference to or 'hidden' behind the principle investigator. As a sector we must recognise the progression path of researchers and value burgeoning, risky and creative ideas. A decoupling of the need to produce four outputs from individuals could enhance the importance of the overall research culture within institutions, and of driving up quality as a collective effort.

- b.** *the maximum number of outputs for each staff member?*

If the number of outputs is based on FTE, there will need to be a maximum number in order to maintain a baseline level of representativeness of the overall unit being submitted. The proposed number seems reasonable, as it could prevent excessive gaming, and minimise the possible detrimental effects of this approach.

We believe a maximum number of six outputs for each staff member to ensure that submissions are not based on the work of only a small number of individuals. Putting a significant amount of pressure on a few senior academics could encourage departments to draw financial support for research 'upwards', depriving mid-career researchers and Early Stage Researchers of much needed institutional support, such as sabbaticals, or loading heavy teaching commitments on mid-career academics. A reasonable approach is one that spreads the responsibility proportionally and fairly – more would be expected of those in a senior position, but not to the detriment of the overall ecology of research in a department or institution. Therefore we might consider a maximum number of five outputs as a suitable alternative.

The proposed number of six should still ensure that the burden of work is spread as it would enable less research intensive institutions to offer a realistic

submission. However, this should be accompanied by a requirement in the 'Environment' assessment to demonstrate how the institution does and aims to develop research capability and activity across the UoA.

c. *setting a minimum requirement of one for each staff member?*

Requiring a minimum output of one for each member of staff would seem to go against the principle of decoupling outputs from staff. Whilst the majority of staff should be able to produce at least one output this proposal could create extreme pressure on staff new to academia who are embarking on an academic career later on in their working lives.

A mid-cycle introduction of the rule will be unnecessarily punitive and part-time/non-traditional researchers will bear the brunt of repercussions. However, a minimum of '0' will provide flexibility for individuals, HEIs and the sector as a whole to adjust to the new idea of 'all staff are submitted' without excessive pressure and the risk of inequitable consequences, particularly for the more vulnerable groups.

The issue of 'non-traditional' researchers:

Individual staff may be engaged in a range of activities which meet their contractual obligations, deliver on their own HEI's strategy and are aligned with HEFCE/Government policy objectives, yet do not produce work that would score highly in REF terms. For example, undertaking short term contract research that solves problems for local SMEs and meets the needs of a local economic regeneration plan is hugely important for HEIs and the economy yet would not yield in itself a high scoring REF output or research impact item.

The issue of 'part-time staff':

There is a particular problem related to part-time staff should a minimum of 1 be implemented. A member of staff on a 0.3 FTE contract has the same minimum requirement as the member of staff on a 1 FTE contract. Furthermore, for staff on a contract of >0.5FTE the situation is the same or less-demanding than REF 2014. Any staff on a contract of less than 0.5 FTE will find themselves in a situation more demanding than REF 2014. This is an unfair demand.

Gameplaying: research passengers

The pressure to achieve a minimum of 1 might lead to authors being added to outputs as 'passengers' rather than researchers that make a significant contribution to an output. This is of course counter to good research practice, however, it would seem reasonable to avoid REF2021 creating pressures and drivers that provide greater benefits for such behaviours.

One compromise position would be to set quota for the maximum number of individuals to be submitted e.g. only 25% headcount of an entry can return '0'; if this is adopted we suggest keeping this quota at a generous level in REF2021 with a view to ramping it up for future exercises. This would address some of the points made in Lord Stern's report about the encouragement of long term research projects.

In summary, if the principle of 'all staff.....' is adopted then we suggest that the REF2021 adopts a minimum of '0' and collects data (e.g. pilot, workshops etc.) to further explore the costs and benefits of moving to a minimum of '1' in the following REF. If another method of selection is chosen, than the number of submissions per staff member must be considered further.

Question 10: *What are your comments on the issues described in relation to portability of outputs, specifically:*

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

We embrace the principle behind the Stern Review's recommendation that outputs should not be portable. However, we do not see acceptance for publication as a suitable marker to identify outputs that an institution can submit for the following reasons.

1. It is extremely hard to show where, precisely, 'an output was demonstrably generated'. For example, consider a book that might have taken six years and would have been put forward for double-weighting in REF2014. Four years of the research might have been spent at one HEI with one sabbatical, and two years at another HEI who granted a second period of sabbatical leave. The institutional affiliation will be with the second HEI but the first may legally claim it was 'demonstrably generated' there and this is where the academic was based when the work was accepted for publication. It is thus extremely difficult to qualify where an output was 'demonstrably generated' because generation could be dispersed across two or even more institutions. (This might especially be the case with chapters or articles submitted to REF 2014 that form part of an extended book project for REF 2021.)
2. Some projects are accepted for publication without any word of the manuscript being written – this may be the case with a monograph or edited collection, or an artistic commission. So it could be accepted while a researcher is at one institution, but researched and written/produced at a second. Would the first institution hold 'ownership'? There is no consideration in what is proposed to the different timetables involved in publishing or disseminating research.
3. There are specific concerns for pieces of work that do not have a single clear acceptance date for publication. This is especially the case for creative practice; indeed, it could be possible for a work to owe its entire existence to experiences of an artist/ academic based at one institution over a number of years, working through informal collaborations with colleagues, discussions, experiments, without any commission at all.

- b.** *what challenges would your institution face in verifying the eligibility of outputs?*

Several of our members would have problems with outputs generated over a period of time by researchers employed across more than one institution.

At present, the role that non-HEIs play in the generation of outputs is not recognised. This creates particular issues for our creative arts HEIs. Artistic production – even where it leads to research outputs – is rarely developed solely

in the context of an HEI and is frequently collaborative, with a variety of external stakeholders including government bodies, NGOs, creative arts organisations and charities.

Research submissions in the creative and performing arts normally consist not merely of a single 'output', but rather a portfolio that may contain evidence of research reaching back a long way (for example, the writing of a major musical work or development of a theatre production). If a researcher leaves an institution, although the 'output' might technically remain with the institution, it would be almost impossible to retain or reconstruct those materials essential to presenting the portfolio as a coherent body of work.

c. *would non-portability have a negative impact on certain groups and how might this be mitigated?*

We welcome the principle behind introducing the non-portable of outputs; however, we believe that for REF2021 non-portability appears on a series of levels to be unduly burdensome. We would welcome non-portability being signalled for future REFs to enable HEIs to put in place efficient systems for recognising investment ethically and robustly, collecting the relevant metadata to map the development of outputs.

While the Stern Review noted that non-portability could prove helpful to those smaller institutions whose staff have been particularly subject to poaching prior to the REF (paragraph 99), we would argue - as a cluster of small institutions - that what is proposed may result in a new stagnation with researchers feeling unable to move because this would actually harm the performance of their new HEI.

Will this just generate a whole new field of gameplaying e.g. researchers hoarding research data/findings and then moving employer to publish? Richer institutions could benefit by having the funds to keep 'prize' researchers with generous salaries. Such behaviours could be hugely damaging to the health and vitality of UK research.

There is a risk that non-portability will impair the career prospects of early career/stage researchers (ECR/ESR). For example, what happens to a PhD completed at one institution, and semi-converted into a book while the author is on a Teaching Fellowship at a second institution; who then owns it? HEIs may be even more reluctant to 'invest' in ESRs if there is concern about whether they bring REFable outputs with them.

For researchers moving to a UK HEI from outside the UK, there is no loss to another UK institution by their being able to bring relevant outputs with them. This could help to attract international researchers during the Brexit period when UK HEIs face the loss of national and international research talent.

We would be concerned to see a situation where an institution's submission may be made up of a very high proportion of outputs from researchers who left the institution but cannot take their outputs with them. How would this give an accurate picture of the vitality and sustainability of the unit?

There are instances where researchers have published outputs at one institution and who then have had an extended period of parental leave or compassionate leave at a second institution. The second institution may have generously supported the researcher.

Possible solutions

We would see mitigation as possible through an effective sharing of outputs. Would it be possible for institutions to have some shared ownership with the researcher concerned so that up to a certain proportion of outputs can remain with an HEI (bearing in mind the difficulties of ascertaining ownership) with a researcher who has moved institutions able to take up to 50% of outputs with them.

It might also be possible to take ESRs out of the portability measure altogether: they could be exempted so that anyone within 5 years of completing a PhD can take their research wherever they go as an ESR.

d. *what comments do you have on sharing outputs proportionally across institutions?*

We would support a fair approach to output sharing, if this could be developed, as a transitional move in the current REF cycle, although we recognise that this will be difficult to manage.

We would therefore argue for shared ownership, rather than proportional ownership, as the most ethical proposition which would allow institutions to ensure all those who had contributed to the output (individual and institution) would have their contribution recognised. This happened in REF 2014 with staff employed on fractional contracts at different HEIs who could submit the same outputs to both institutions.

This may only be workable as an alternative to overall non-portability. For example, where a researcher moves institutions within 12 months of the submission, both institutions are able to select the outputs produced within a set timeframe. This would mitigate the need to implement non-portability by meeting the principles of this proposal, whilst minimising burden and unintended consequences.

Question 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?*

We would support this introduction should information around individual staff member need to be collected.

One reservation that we may have is around the time it might take to implement ORCID and link it to outputs repositories. For E-prints repository users, the plugin configuration can be time consuming and result in an additional financial cost.

Therefore, we would welcome this in the longer term and the next REF. However in the short term, there are institutions which do not yet have the capacity to ensure that all academic staff have an ORCID id.

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

We see the benefits in removing the Category C category but recognise that there may be Emeritus Professors who have made a valuable contribution to a research environment who could be disadvantaged by what is proposed. Perhaps Emeritus Professors who have retired during the Census period could be included?

Furthermore, the inclusion of Category C staff from REF 2014 is relatively recent. It has value in including researchers in partner institutions and in enhancing interdisciplinary research, knowledge exchange and impact. Some members have expressed concern that it would be premature to withdraw this category for REF 2021 in mid-cycle.

Question 13: What comments do you have on the definition of research assistants?

Research assistants in our disciplines found it disempowering that they could not be entered for REF 2014. In view of the emphasis on inclusivity in this document, we would welcome changes that would both ensure greater clarity and allow for the research assistants – often self-defining as ECRS -- to be included in HEI submissions.

Very specific guidance on research assistants and eligibility would be useful so that the process of submitting staff is as unburdensome as possible.

The down-side of including Research Assistants, given their greater abundance in STEM disciplines when compared to AHSS, is that it would dramatically increase the number of Outputs and Impact Case Studies required in STEM UoAs – unless different multipliers were used for STEM and AHSS, with an attendant increase in the complexity of the exercise.

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

0.2FTE is a reasonable cut-off for fractional contracts and is consistent with previous exercises. We do not support the requirement to submit a qualifying statement for 0.2FTE staff.

For our creative arts members, fractional contracts are a key practice, allowing them to encourage and pursue collaboration between HE and industry. Any proposal to shift the 0.2 FTE minimum could really affect, in a detrimental manner, their ability to retain world-leading researchers working at the interface between higher education and industry.

We would ask the funding councils to consider the statement only for staff on fractional contracts who have research posts at HEIs outside the UK or who have been appointed to positions in the final two years of the census period.

Question 15: What are your comments on better supporting collaboration between academia and organisations beyond higher education in REF 2021?

We support the drive to enhance collaborations for research and innovation between HEIs with businesses and other organisations and partnerships outside the sector, and the thrust of the Dowling Review. However Dowling focussed mainly on HEI-corporate partnerships and had little to say about HEIs working with small-medium sized enterprises (SMEs) which constitute a large share of the innovation economy. REF 2021 should propose data

indicators on HEI and SME partner engagement in research, including staff mobility and collaborative projects.

The collaborations between schools and HEIs is welcomed for education departments who are increasingly working with schools to support them in their required research endeavours. A degree of flexibility regarding the number of research outputs to be submitted by a UoA would allow for greater collaboration between academia and non HEIs. The Environment template can offer opportunities for delineating close partnerships with industry. There might also be opportunities for outputs created with industry partners/collaborators to narrate this within an additional information area. There might be a consideration of allowing researchers coming into academic positions from industry to submit 0 outputs to allow for different kinds of contribution to the research infrastructure/culture to be recognised.

We would also support suggestions made by the NCCPE, and as we have argued elsewhere in the consultation, to make it easier for those from outside academia to quickly establish themselves, through:

- Reducing output thresholds
- Broadening the definition of underpinning research to (for instance) recognise work to nurture and sustain research networks

Question 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 postdate the submission deadline?

We would welcome the proposal to allow the submission of a reserve output in cases where the publication of the preferred output will postdate the submission deadline. This suggestion would go some way in helping Early Stage Researchers who have recently moved into academia from another industry achieve tangible research outputs within the review period.

Question 17: What are your comments on the assessment of interdisciplinary research in REF 2021?

The proposals in para 72 [a,b,c] for interdisciplinary champions; mandating interdisciplinary identifiers; and coverage in the research environment template; are reasonable and broadly supported.

However, as noted above, the use of HESA codes may discourage staff undertaking interdisciplinary work if they deem it to be a risky venture. Hence a strong narrative as suggested in para 72 would be necessary and welcomed.

This said, we would encourage the continuation of arrangements made for REF 2014, including cross-referral and a panel structure that brings together cognate disciplines. Our creative institutions have concerns about 'interdisciplinary champions' that might favour a one-size-fits-all approach; that said if the champions across the panel were required to meet, it might ensure a consistency of approach. We would support both an interdisciplinary identifier and building on the arrangements for REF 2014 which encouraged interdisciplinary collaborations to be delineated in the final section of the template. It is worth recognising, however, that not all interdisciplinary research identifies itself as interdisciplinary. There is no clear-cut way of defining what interdisciplinarity consists in and it could be argued that most arts-based research displays interdisciplinary tendencies.

There is a potential concern around introducing a separate section focusing on interdisciplinary research within the environment statement (mentioned in parag. 112). This

might have the unintended effect of seeing research that may be interdisciplinary but does not define itself as such being seen as second-rate. REF should be looking to reward excellent research in all shapes and forms wherever it is found. Definitions around inter-, cross- and multi-disciplinary do vary and there is slippage between these categories. The REF 2014 Panel D report made excellent observations on interdisciplinarity in arts and humanities research.

Question 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?*

We agree with a proposal to use quantitative data to inform the assessment of outputs where considered appropriate for the discipline. It is imperative, however, that subject specialists should determine whether metrics are appropriate, what form they should take, and how much weight they should have in evaluating the output. As we argued in our submission to the Stern Review, metrics should not be substituted for or divorced from qualitative assessment of outputs, impacts and contexts.

We would also wish to reinforce the importance of a robust system of peer review that draws on the expertise of experienced researchers and industry representatives who have an awareness of engaging with (and drawing on) research in their own work. It is essential that the principle of peer review continues as the primary mechanism for evaluating research, informed by concrete, reliable data and other carefully selected indicators.

Question 19: *Do you agree with the proposal to maintain consistency where possible with the REF 2014 impact assessment process?*

We agree with the proposal to maintain consistency where possible with the REF 2014 impact assessment procedures.

Question 20: *What comments do you have on the recommendation to broaden and deepen the definition of impact?*

We welcome the move to unify, broaden and deepen the definition of impact.

Question 21: *Do you agree with the proposal for the funding bodies and Research Councils UK to align their definitions of academic and wider impact? If yes, what comments do you have on the proposed definitions?*

We warmly welcome the proposal for the funding bodies and Research Councils UK to align their definitions of impact.

We welcome the definition of Academic Impact and believe it is important that applies to all educational levels – from early years through to HE Level 8.

We welcome the broadening in the definition of Wider Impact. However, by listing several areas where impact might be expected to occur (eg health), it starts to narrow down the definition. For example, it could be read that “Culture” does not include the “arts”. It would be better to reduce the length of the definition and broaden it to: “Wider impact: an effect on, change to or benefit to the world outside academia”.

We also support NCCPE's recommendation that the definition of underpinning research is deepened: *"Research outputs play a significant role in underpinning impact – but we would welcome a broader definition of what can be submitted as underpinning research. For instance the role of research networks are critical to enable the active uptake of research; individual's or group's embodied expertise (their 'body of work') is often what fuels the impact; research networks act as powerful instruments to generate impact, as do research facilities and resources – whether virtual or physical assets. It would help to acknowledge a greater diversity of research activity."*

Question 22: What comments do you have on the criteria of reach and significance?

We would agree with NCCPE that there is considerable scope to improve the clarity of guidance about 'reach and significance'.

In particular we reference the NCCPE submission as follows:

"Our response is built upon what is acknowledged to be good practice in evaluation. Three questions will typically be in an assessor's mind, which a good evaluation should address:

- 1. What did you do? Please provide me with an indication of the scale of the activity you undertook – tangible measures of what took place (the outputs)*
- 2. What changed? Please provide indicators which make clear the effects / impact that your intervention realised (the outcomes)*
- 3. Why is this significant? Please provide me with contextual information to help me interpret the extent to which the outcomes you are claiming are credible and significant. Can you clarify the context and rationale for your work to help me assess the link between the outputs and outcomes?*

To make a robust judgement of impact, assessors needs to draw on more than just a list of claimed outcomes. They need to be presented with evidence of:

- The reach – what was done; with whom; on what scale*
- The significance – contextual factors to bear in mind when interpreting the activity, participants and claimed impact*
- The outcomes – a precise articulation of the specific benefits / changes which were realised"*

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

We would like to see Public Engagement clearly incentivised in the guidance, as a critical mechanism whereby research can realise impact. We think additional guidance would be extremely valuable, to back up this broad encouragement with some clear frameworks to guide both what is submitted and how it is assessed.

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

We disagree with the suggestion that impacts should remain wholly with the institutions at which the underpinning research was generated.

The impact element of REF2014 enabled many smaller, specialist institutions to articulate these socio-economic benefits of their research for the first time in a consistent way. As the impact agenda matures, we would like to see more flexibility and recognition for the diversity of research conducted by HEIs.

For example, REF2014 impacts generated by applied research and consultancy were not admissible unless the original research was generated by the investigator. This ignores the reality of those disciplines where impact is not always down to single or small sets of evidence from one author, group or institution but from an accumulation of inputs over time. But the ability to lever original research in this way, enhanced by long-term relationships with industry and society, adds significant value by creating additional impact. As was acknowledged in the Nurse Review, applied and consultancy research is a valued and vital part of the UK research ecosystem and as such it should be afforded similar opportunities as discovery research to articulate and be rewarded for the impacts it generates.

It is often difficult, as with impact based on a body of work developed over a long period of time, to attribute ownership of the research to one institution. Researchers did report challenges in tracing information and evidence relating to staff who have left an institution. More worrying, institutions were uneasy about submitting staff whose research might encompass publications/outputs at two different institutions. Impact can sometimes be related to underlying research produced at different institutions and this needs some further consideration. For example, the AHRC encourages collaboration between institutions – not least through the academic collaborations initiated by the Block Grant Partnership/Doctoral Training Partnership Scheme. It is quite conceivable that the issue of complex research configurations operating through partnerships, across fields and institutions, will intensify, and for this reason it will be increasingly important to facilitate ways of sharing impact case studies.

However, we acknowledge for some disciplines introducing portability of impact would incur disadvantages. For example, in agriculture, impacts can take decades to be apparent as a consequence of the long timescale of the production process of agricultural products, which may involve several years e.g. for a crop rotation. Thus the considerable investment by a university needed for this research will be disincentivised by portability of impacts. This is different to portability of outputs, which we support to encourage ESR movement, since these can be produced over a shorter timescale and investment may be much lower.

Question 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?

The proposal to move contextual information about approach to impact to the environment template seems sensible, as the application of the assessment criteria of reach and significance to this type of important contextual information is problematic. Impact strategy, impact types and engagement with stakeholders can be seen as part of the vitality and sustainability of the research environment.

However the impact sub-profile will be driven entirely by the UoA case studies. There is a concern that the inclusion of institutional impact cases may dilute the available pool of excellent UoA case studies in HEIs.

This is because the impact template did allow for a discussion of how all staff (and not simply those whose impact case studies were being presented for assessment) were contributing to the development and realisation of impact within the UoA. If information on the approach to supporting and enabling impact is to be captured within the environment template, this represents a subtle increase in the weight that is placed on impact by

extending it to 'supporting and enabling' within overall environment. In effect the decision to assess impact only on the basis of case studies could undermine the emphasis on inclusivity (with the proposal that all researchers be submitted to REF 2021). Impact would possibly therefore gravitate around the work of a very small number of researchers. So there are some problems in decoupling strategies for generating impact from the impact case studies with the strategies for developing impact now being seen as part of the assessment of environment.

If the template were to be retained we support keeping its word limit to facilitate consistency across universities.

Question 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?

For the number of case studies to be based on research-active staff as defined in HESA may be problematic for the reasons we outlined earlier in the consultation. The case study ratio should be based upon whichever eventual method is used to select and define staff. There are obviously ethical issues involved in the minimum requirement shifting from two to one case study. As the scores for individual case studies would therefore be available, they could be used by HEIs for performance management purposes.

At the same time, we recognise the burden for small institutions of producing two case studies and the required number of case studies for REF 2014 having an effect on staff selection. Perhaps there are longer term benefits to folding environment and impact together that warrant further consideration. Impact would then be widened into an institutional consideration at the level of research environment and how an institution deploys, encourages and supports the realisation of impact.

Question 27: Do you agree with the proposal to include mandatory fields (paragraph 96) in the impact case study template, to support the assessment and audit process better?

In general, we support the mandatory fields proposed in the case study template.

However, we do have a concern with what is proposed here. Not all outputs have DOIs. This needs to be taken into account. The proposed template seems to see research outputs in terms of articles (which do have DOIs). What happens here to practice outputs or other forms of (non-print based) output? We have some concerns about terminology that seems to present articles as the assumed output underpinning the research.

Question 28: What comments do you have on the inclusion of further optional fields in the impact case study template (paragraph 97)?

We would welcome the further optional fields. This might make for a longer template but it would enable the conditions leading to impact to be listed and narrated. Some standardisation would need to be introduced.

Optional fields are reasonable unless they appear to lend particular weighting to criteria that are not relevant to the actual impact assessment criteria. For example, a project that has received external funding may intuitively indicate a 'greater impact' given the normative valuation of research funding in HE, however, this may have no bearing whatsoever on the reach and significance of the impact.

We would prefer if the post-REF analysis was based on other means e.g. smart text searches etc., rather than risking introducing a bias to the assessment process.

Question 29: *What comments do you have on the inclusion of examples of impact arising from research activity and bodies of work as well as from specific research outputs?*

We welcome the inclusion of example of impact arising from research activity and bodies of work as well as specific outputs as this starts to recognise that eventual impact (rather than outcome) is made up many different factors over a period of time. A research output does not immediately lead to a linear output.

Some UoAs struggled in REF 2014 to locate outputs that had generated impact that met the 2* eligibility criterion. In effect the research had to be assessed as meeting the 2* criterion before the impact could be assessed. Any criteria based on standards of rigour will therefore require the outputs to be assessed (burdensome for the panels). Examples of impact arising from research activity and bodies of work might be easier – but the portability issue will discount particular impacts where the body of research might have been undertaken at different institutions. Again, this warrants some consideration. Bodies of work are not always undertaken at single HEIs. The issue of industry partners who are part of the generation of the impact also deserves attention.

For our creative institutions, it is not unusual for impact to feature as part of the whole research journey rather than as an annex conceived after the findings have been disseminated. Where performances, installations, exhibitions etc are placed in front of a public or have involved wider users, feedback from those stakeholders on the process and / or outcome as it relates to an explicit or stated research intention can productively form part of the process of documenting the project's significance, originality and rigour. Impact is thus often embodied within the research and not generated subsequently. 'Associated research' would be a better term for capturing the relationship across research and impact.

Question 30: *Do you agree with the proposed timeframe for the underpinning research activity (1 January 2000 to 31 December 2020)?*

For the majority of disciplines, we do agree that the proposed timeframe is suitable. However for our members specialising in agriculture, impacts can take decades to be apparent as a consequence of the long timescale of the production process of agricultural products, which may involve several years e.g. for a crop rotation. Thus a longer time-period may enable more impacts to be captured with a greater reach and significance.

Question 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?*

Based upon the REF2014 panel criteria methods, the definition of rigour (*the purpose is clearly articulated, an appropriate methodology has been adopted, and compelling evidence presented to show that the purpose has been achieved*) would appear the most relevant of originality, significance and rigour to draw out for special attention in assessing impact.

We would suggest that the standards of rigour should be equivalent to those used to assess outputs for REF. This would simply mean that the 'underpinning research, research activity or a body of work' should be available to the panel for assessment if required, and if not assessed in prior RAE/REF.

However, we do have some concerns. The question of 'how' to assess rigour would seem to require a specific part of the impact case study to attend explicitly to methodological issues. We foresee that it might be difficult to disaggregate the rigour of a methodology from questions of its originality and significance.

We also question whether the threshold of the underpinning research, research activity or a body of work should meet the requirements of 1* rather than 2* i.e. Quality that is recognised nationally in terms of originality, significance and rigour. The focus in impact should be on the quality of impact and not a 'double whammy' effect on outputs.

Whilst the REF naturally focusses attention on 3* and 4* research, the achievement of 1* should not be overlooked – this is still 'national level' research. It is sufficiently original, significant and rigorous to merit recognition at the national level. National level research has just as much potential to generate outstanding 4* impact as research that is recognised internationally.

For example, an academic in business and management undertakes some consultancy with a local SME drawing on their research expertise, they then publish an incrementally interesting but not groundbreaking case-study based article in a more applied but still peer-reviewed journal that meets a 1* rating for REF output. The consultancy itself provides the platform for an SME to launch a new 'healthy lifestyle' Web App that becomes a global bestseller and according to feedback on the App store is helping users change their lifestyle for the better. The research activity is legitimate since it meets the definition of research as activity of direct relevance to industry whose new insights (albeit incremental) are effectively shared in a peer-reviewed journal, and the impact is eligible since there has been a significant and tangible material benefit to the SME and the users of the Web App. Panels are practised and confident in assessing 1* outputs so this should be straightforward to implement for outputs and also for research activity and body of work.

One useful test is to ask, 'Would the impact have been achieved if it had not been for the output, research activity or body of work?' If the answer is no then the output, research activity or body of work is legitimate.

Question 32: *Evaluation of REF 2014 found that provision of impact evidence was challenging for HEIs and panels. Do you have any comments on the following:*

a. *The suggestion to provide audit evidence to the panels?*

There will be concern about any attempt to present standardised measures that could signal a hierarchy of evidence which may not be applicable to certain types of impact. There could be clear guidance on standardised numerical measures – consistent numerical units could support both the panels' assessment and offer indications of best practice to submitting UoAs. A set of guidelines on suggested types and standards of data would be useful. Meaningful audit materials in the case of artistic research impact are potentially hard to provide in quantitative format: so much impact is measured qualitatively.

We feel that this is an area where a sampling based strategy for assessment and audit (for underpinning quality and research and significance) would be sufficient to ensure that HEIs make legitimate claims in their case studies and have readily available the necessary supporting evidence. The template provided opportunity to provide corroborating evidence for underpinning research and impacts, and our experience of the audit process for Impact Case Studies indicated that it was fit for purpose.

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

Guidelines for the use and standard of quantitative data would need to be developed.

Whilst such data could be useful for some impact types, it would not be relevant for all. This would increase the disparity of burden in providing evidence for different impact types. As such, it is likely to further concentrate impact case study types and continue the lack of representation of the breadth of the impact of UK research. It would seem sensible to continue to explore these issues with the Forum for Responsible Metrics, but with a view to introducing them in the post-2021 REF exercise, at which stage the implications and mitigating actions are likely to be better understood. For the upcoming exercise, more detailed guidance on the type of approach expected could be useful.

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

The guidance should encourage clearly-written case studies, with credible accounts of the relation between the research and the resulting impact, supported by persuasive corroborating evidence. Each case study should present the data and information it needs to evidence the benefit.

Impact case studies too often prioritise the role of the unit or HEI to the detriment of a non-HEI project partner. There are ethical issues here that merit consideration. Labour and expertise need to be credited and acknowledged, with the contribution made by non-HEIs to research impact openly articulated.

We would also point out that some larger HEIs employed impact case study writers which would seem unfair. Smaller universities are not in a position to be able to afford to do so, potentially creating an uneven playing field, and placing increased burden on academics.

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

It is valid to include impact cases or examples submitted in 2014 which continue to demonstrate longer-term impact. For additionality they should demonstrate currency [the work remains live and continues to be developed, applied or validated]. They could be expected to demonstrate academic and/or wider impact.

Continuity will necessarily be dependent on a degree of additionality, as with additional beneficiaries/benefits in the 2014-20, new statistics and data, and possibly new research underpinning the impact. The relationship between continuity and additionality cannot easily be disaggregated. It would be a shame if developing impacts identified in the REF 2014 period could not be presented at a further stage of development in 2021. REF should encourage the presentation of impact in any shape or form that relates to the criteria. For our agriculture based members, the ability to submit impact case studies also used in REF2014, without the need for additionality, will allow both greater reach and greater significance to materialise.

Question 34a: *Do you agree with the proposal to improve the structure of the environment template and introduce more quantitative data into this aspect of the assessment?*

We cautiously welcome this proposal where it is designed to reduce burden. However, we are concerned that introducing more metrics may disadvantage smaller and/or specialist institutions where highly productive and innovative islands of excellent research environment exist. Therefore, in each of these metrics it would be possible, and reasonable to give per FTE figures.

The question might be put forward – does the REF wish to recognise highly efficient, innovative and excellent environments that effectively lever their resources or just the largest ones that can, for example, afford many, expensive, highly equipped labs?

Potential metrics that could cautiously be adopted in the environment statement:

- PRES overall scores for institutions over a certain number of PhDs
- External indicators of significant advances related to E&D e.g. Equality Charter marks, Stonewall, Two Ticks (and renamed version), Athena Swann and Juno (for relevant areas)
- PhD completions
- PhD withdrawals
- Research Income
- Facilities investment

Confirmation of institutional signing up for:

- HR Excellence in Research Award (Award and number of years retained)
- Concordat on Public Engagement
- Concordat to Support Research Integrity
- Concordat on Open Research Data

And:

- Progress towards meeting Open Access Policy across whole institution
- Participation in Equipment Sharing Database

REF 2014 did allow for the presentation of HESA data but this was in a separate document that had to be cross referenced by panels to the Environment template. Bringing the data together will be useful as it will allow the data to inform the narrative.

Data should, however, be understood as commensurate to the size of the submitting institution and/or UoA. It is worth considering that there is only so much one can evidence through small data sets. In addition, disciplinary differences need to be taken into consideration. Some narrative information in the environment template will still be required to provide contextual framing for the quantitative data. However, this may be useful for informing strategies for building research capacity in younger institutions.

The introduction of more quantitative data should not be at the expense of undervaluing other significant aspects of the environment that relate to its vitality and sustainability: it is so important that we recognise the benefits of the initiatives put in place to support equality and diversity for REF 2014. These made a huge difference to Early Stage Researchers, those with complex circumstances and staff who had had periods of parental leave. Equality and diversity needs to be given due consideration in the structuring of the environment template.

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

Data used for other external audits may be useful, for example QAA HER. Information on destinations for research degree students might also evidence the vitality of the research environment, as long as this does not only privilege academic job placement, but instead understands successful employment as taking place in a variety of related fields, including cultural industries.

Higher Education Business and Community Interaction (HE-BCI) Survey data might also be drawn on in delineating approaches to impact.

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

Collaborative research with non-HEI partners should be further encouraged. HEIs are highly competitive and do not always have structures in place to encourage interdisciplinary research across different institutions. We would welcome due consideration be given to the ways in which research realised with a range of partners (both HEI and non-HEI) be recognised and further stimulated. Joint submissions with research-active non-HEIs might be considered, as might joint submissions between units in different HEIs. Any changes should ensure that the process not result in additional burden.

We would therefore welcome the opportunity for the environment narrative to provide more recognition to universities' collaboration beyond HE while also recognising that there should also be an opportunity for this information to be presented with research outputs realised with industry and charity partners where appropriate. As these collaborations take many shapes and forms, the funding councils might want to encourage flexibility in how these are documented/narrated with a relatively open section on research collaborations beyond HE. It is important to ensure that collaborations are not then repeated in any impact sections of the template.

Question 36: *Do you agree with the proposals for awarding additional credit to units for open access?*

We are absolutely supportive of the OA agenda and welcome the moves towards it.

There are however a couple of points that do need considering.

The OA requirements for journal articles and conference proceedings with an ISSN, whilst welcome, are challenging and not un-problematic due to diverse publication and publisher practices and the variety of repository systems across the sector.

It is difficult to see how the notion of 'additional credit' would be implemented (also shouldn't this be termed 'additional weighting' since the credit itself is not 'additional'). All things being equal would a research environment that had achieved greater OA 'success' score more highly than a research environment where 'success' had been lesser (and how much should a score be modified for how much difference in OA performance?). Does progress against Open Access trump progress against the HR Excellence Award or research income or PhD completions?

Should an institution with limited resources prioritise OA over researcher development?

Arguably the latter is more relevant to research environment, and has been picked up as a theme by Stern.

This could be problematic for some disciplines, particularly those based in the creative arts. For example, there are at times copyright issues with images or video material when placing an article open access, and the research findings of the piece may be compromised when only textual material is placed open access in an institutional repository. For particular types of performance output, open access may not be possible, as with a performance realised with a number of industry collaborators who may be reliant on box office income or product sales. Would Arts Council England expect a piece of creative practice to be open access – this might bankrupt creative industry organisations and lead to a destabilising of the creative industries ecology in the UK. Would novels or commercial recordings be expected to be open access? How might this affect the livelihood of artist-researchers on fractional positions in HE institutions? Different disciplinary practices need to be respected and taken into consideration into discussions of open access.

We therefore recommend that OA is not singled out as a priority area within the Research Environment Statement but is considered alongside all of the other worthy policy initiatives (researcher development, research integrity, research data, public engagement, equality and diversity), and considered in the round.

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

It is widely seen as a public good for research data to be shared as Open data, and this is increasingly required by funders (e.g. Horizon 2020). However, we believe that it is too early in the sector for a reasonable and fair incentive for Open Research Data to be introduced into the REF.

Any plans for the open access of research data must take into consideration legal, ethical and regulatory frameworks and norms. We would wish to avoid any situation where these issues are compromised or data taken out of context in ways that are harmful or even dangerous.

We are keen to drive this agenda forward. We believe that CREST's involvement in the Research Data Shared Management System Pilot from Jisc will help the open data agenda. Encouraging researchers to use such services offers a way to make research data safely and easily available. The project is keen to make data sharing as simple as possible for the researcher; any other incentives should ensure that they think about ease of use.

Question 38: What are your views on the introduction of institutional-level assessment of impact and environment?

We support the institutional-level environment statement which will recognise the research infrastructure above the UoA levels and counter the reduction in narrative data at the UoA level. This could help capture institutional membership of research networks that enhance individual institutions' (as well as the national) research environment.

Whilst we agree with the increased emphasis on impact, we believe institutional impact assessment is more problematic. There is concern that the requirement for institutional impact cases could remove examples of excellence from inclusion in UoAs.

We would further contend that institutional research impact could very easily be confused with institutional impact – two distinct and separate things – and thus lead to the wrong things being measured in a research excellence framework.

The Institutional Impact case studies would appear to be a solution looking for a problem. There are a number of questions that would need to be discussed before this could be taken forward: How do they differ from UoA impact case study? Is an institutional impact case study simply a ‘supercharged’ UoA study? Does it have to draw from more than one discipline, one department, one Unit of Assessment if so, which and how many? What about specialist single UoA institutions (e.g. Veterinary colleges, Music colleges, Arts Universities Agricultural colleges? Law Schools?). Similar issues may apply to smaller institutions that cover a small number of UoAs?

If the aim is to demonstrate interdisciplinary and collaborative impacts [para 119] then an approach which could achieve this would be to produce an institutional narrative or portfolio which could reference impact case studies which demonstrated these outcomes, and which could also be submitted at UoA level. This could present a more coherent and integrated approach of large-scale interdisciplinarity than simply requiring additional cases.

Institutional level reporting as conceived here might also be weighted to favour large, multi-faculty institutions like those of the Review Steering Committee members. Excellent research is produced at HEIs of different scales and scopes, including small, specialist institutions, and it is this imperative of respecting the rich ecology of research HEIs in the UK that has arguably led to world-leading research.

Some particular concerns follow:

- Since UoA impact case studies can be interdisciplinary, an institutional level interdisciplinary impact case study is not needed.
- An institutional level environment statement could be a duplication in part for small submissions with few UoAs, and a complete duplication for single UoA submissions. There would need to be very clearly distinct criteria for each to avoid this overlap.
- There are also concerns in the sector about who is qualified to review the institutional level environment statements. There are very different economies of scale here and it is key (under diversity and equality criteria) that differences between institutional settings are fairly captured. There needs to be clarity about the relationship between institutional level panels and sub-panels.

Question 39: *Do you have any comments on the factors that should be considered when piloting an institutional-level assessment?*

Further consideration of how this assessment might work in practice is needed before a pilot can begin. It is likely that implementation of institutional level assessment without unintended consequences will only be feasible for implementation in the post-2021 REF.

The main issues, in summary are:

- 1) What benefit is being gained or put another way, what problem is being addressed? The purpose is not yet clear or supported by evidence or by strategic/policy gain?
- 2) Consider the additional burden in institutions and the sector more widely?

- 3) There are specific issues related to the opportunities for internal interdisciplinarity and collaborative work that will have particular impact for smaller and/or specialist institutions that should be explored if a pilot is to be commissioned.

In addition, there is potentially a systemic problem here, in combining institutional and single UoA scores the extremes will be amplified and the middle (which for the sake of argument and adopting the law of averages would be about 50% of the cases) would give a false picture i.e. the REF would gravitate to towards mediocrity for around half of the cases. Illustrated below:

- Strong Institutional Level Statement (ILS) and Strong UoA = the effect is amplified
- Strong ILS and Weak UoA = weaker units are 'masked' in higher performing institutions
- Weak ILS and Strong UoA = stronger units will be diluted by weaker institutional statements
- Weak ILS and Weak UoA = the effect is amplified

We would favour an approach that allows UoAs to delineate how they draw on institutional opportunities/provision in the development of their research environment.

We would have concerns that small specialist institutions or smaller HEIs would be disadvantaged by what is proposed (eg doctoral training centres) and any plans to introduce an institutional level assessment should recognise the different types of HEIs that make up the UK's research culture.

Furthermore, the RCUK Grand Challenges and other high-level integrative themes and priorities such as those in the recent Government Industrial Strategy could also be recommended as themes against which HEIs could demonstrate interdisciplinary impact.

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

As outlined in previous answers, we view institutional-level of environment positively; however, the institutional-level impact submission would prove problematic for smaller and specialist institutions. We feel this would already be sufficiently covered through the environmental template and UoA level impact case studies.

Question 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?

By thinking about research programmes and their interactions with wider society, we have the potential to greatly advance the difference our work makes. REF can help incentivise us to think in this way, through greater linkages to schemes, such as the Global Challenges Research Fund and the new Industrial Strategy Challenges Fund. We must think further about our actual impact in order to justify the investment in all types of research excellence whether it is found.

In order to embrace the findings of the Stern Review (which recommended that impact should be a minimum of 20%, not a maximum) and the Dowling Review, we recommend that the impact weighting should be raised and that the outputs weighting reduced. An impact weighting of 30%, for example, would encourage us to consider both types of research impact further.

However, the change in the ratio could result in larger institutions paying for professional copywriters to produce impact case studies; something smaller institutions would not be able to afford. Care would need to be taken to ensure that this does not unfairly sway the results.

Question 42: *Do you agree with the proposed split of the weightings between the institutional and submission-level elements of impact and environment?*

We agree with the split to an extent.

We are supportive of the weighting for environment.

We do not agree with the weighting for institutional level impact for the reasons outlined above. We would emphasise that this is because we believe the institutional research impact will get too easily confused with overall institutional impact, something that REF does not seek to measure. The effort required in producing artificial institutional case studies would be better spent in achieving higher numbers of beneficial, tangible and visible impacts at UoA level.

Question 43: *What comments do you have on the proposed timetable for REF 2021?*

It needs to be recognised that we are almost at the mid-point of the cycle between the start and end of the publication period. There has already been slippage as a result of the two consultation processes and this has meant HEIs have had to make assumptions in order to plan for REF 2021. The submission period is realistic but it is essential that the decisions on the REF 2021 arrangements are published as promised in 'mid 2017' and do not slip beyond that point.

The publication of submission guidance and panel criteria during 2018 will be essential.

We would want to see details in the next iteration of the appointment of subpanel chairs and subpanel members and assessors which will ensure that those appointed will have ensured they have the time to undertake the work that is required of them.

Other comments

Question 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?*

We would strongly emphasise that excellent research continues to be funded wherever it is found.

We welcome the commitment to continuity but would urge the Funding Councils to ensure that any changes to REF do not compromise any of the following: the Haldane principle; the commitment to excellence identified as the key driver for investment; the commitment to curiosity-driven research; the importance of an independent, expert peer review system; the need to ensure that QR funding continues to fund research across the broadest range of STEM and STEAM subjects, respecting and recognising both interdisciplinarity and diversity

Evidencing and documenting practice research:

Comments in a number of REF2014 Panel D reports (as with those of subpanels 34 and 35) drew attention to the particular challenges involved in presenting the research dimensions of

creative practice. We would welcome a set of agreed principles on the production of portfolios that would ultimately reduce burden, encourage compatibility and allow for the research to be more searchable and accessible.

REF & TEF

The Minister of State for Universities, Science, Research and Innovation has stated his intention that REF and TEF should be complementary. One way to minimise incentivising the division between teaching and research might be to require only submission of staff on 'teaching and research' contracts, and neither staff on teaching only nor research only contracts. We appreciate that this might be something to work towards for 2028.

Open Access:

There is gap in the timeline between the effective date of the HEFCE OA policy (1/4/2016) and the public announcement, via the HEFCE consultation (8/12/17), that it is likely (but not confirmed) that all academic staff will now be submitted to the REF. Therefore, there have been large numbers of academic staff who were undertaking their contracted roles usefully and productively but who were not on a REF trajectory and therefore not covered by the HEFCE OA policy, who now find themselves within its remit.

We recommend that an exemption is applied for such staff falling into this scenario, and that a period of grace be extended beyond 8th December since it shouldn't be assumed that implications of the consultation would reach all corners of all institutions on the day of its publication.

Alternative to REF?

The primary purpose of REF appears to be to guide the allocation of funding to institutions, and there may be simpler ways to achieve this in a fair way. For example, if an aim is to support all institutions in growing their research capability, capacity and impact (thus enhancing competition in the sector in the UK, and enhancing the availability of expertise to the users of research results), then allocating funding on a per capita basis by research-active staff may be an effective mechanism. Funding could thus be realigned across the full range of research-active institutions across the UK no matter their location, supporting research excellence wherever it is found and whatever it looks like.