

UNIVERSITY OF SUSSEX

REF2021 Code of Practice

Part 1: Introduction

1.1 General Introduction

- 1.1.1 This Code of Practice sets out how the University of Sussex plans to make its submission to REF2021 in a fair, transparent and inclusive way, whilst complying with the REF guidance and developing a submission that represents the excellence of research at Sussex. The Code has been written with careful attention to the requirements described in the published REF guidance, whilst bringing the values and strategy of Sussex to bear on how those requirements are applied within the University.
- 1.1.2 The principles and processes set out in the Code reflect the nature of Sussex as a research-intensive institution with ambitious goals for its research, as set out in its Sussex 2025 Strategic Framework.
- 1.1.3 All staff at Sussex, particularly those engaged in research at any level, are encouraged to read and familiarise themselves with this Code. Postgraduate researchers are also encouraged to read the Code. Questions on it should be raised in the first instance with the Research Quality and Impact (RQI) Team via rqi@sussex.ac.uk.
- 1.1.4 The Code applies to all staff employed by the University of Sussex, including any who may be included in joint REF submissions with other institutions. The Code includes all staff employed by the University of Sussex and who work in the Brighton and Sussex Medical School (BSMS), which is a joint enterprise between the universities of Sussex and Brighton. A note on the role of the Brighton and Sussex Medical School (BSMS) is given in Appendix 3.
- 1.1.5 The University seeks to treat all colleagues who contribute to the REF submission in a fair and transparent way, whilst applying processes to ensure the quality of the submission are robust. This encompasses both colleagues who contribute to the REF submission directly – for example, through having outputs included in the submission under their name – and those who contribute indirectly, which includes all those who form part of the research environment at Sussex, including non-Category A research and research support staff, and postgraduate researchers.
- 1.1.6 Ensuring the Code is supportive of the University's priorities for equalities, diversity and inclusion has been key throughout the development of this document, and the context for this is set out in the following section. The approach to equalities, diversity and inclusion is informed by the principle that promoting equality enables research quality, rather than restricting it.

1.2 Introduction: Equalities, Diversity and Inclusion (EDI)

- 1.2.1 This Code of Practice reflects and adds to a continuously developing equalities and diversity infrastructure at the University of Sussex.
- 1.2.2 This infrastructure is overseen by the University Executive Group and by a dedicated Deputy Pro-Vice-Chancellor for Equalities and Diversity; it is co-ordinated by a dedicated Equalities, Diversity and Inclusion unit, currently composed of 1.95 (soon to rise to 2.55) staff FTE,

based within Human Resources. This infrastructure is supported and extended by a series of EDI-related networks at institutional level, amongst the academic Schools and in Professional Services divisions. This is described in greater detail below.

- 1.2.3 At an institutional policy level, EDI is underpinned by the University's Equality, Diversity and Inclusion Strategy and its Equality and Diversity Policy (included here as Appendix 5); and by several supporting policies, notably the Policy to Prevent Harassment and Bullying at Work, the Mental Health Policy, and the Trans and Non-Binary Equality Policy Statement. The EDI unit manages the updating of these policies in line with national legislation and other external and internal developments, and works to ensure all relevant policies take account of their EDI implications, and recognise and manage these appropriately.
- 1.2.4 The University's leadership positively recognises that embedding structures and a culture that is supportive of EDI is a long-term and ongoing task, as discussed by the Vice-Chancellor and others in several public fora.

1.3 An update of actions taken since REF 2014.

- 1.3.1 Since REF2014, the University's infrastructure and institutional commitments to equalities and diversity have been very significantly enhanced, with an emphasis on providing leadership and meaningful resource capacity to embed EDI within the University. Key actions have included:
- The appointment of a new leadership role, the Deputy Pro-Vice-Chancellor for Equalities and Diversity;
 - The establishment of a professional Equality, Diversity and Inclusion (EDI) unit, based within Human Resources;
 - The introduction of a new institutional EDI Strategy;
 - The appointment of EDI champions across Schools and Professional Services divisions;
 - The appointment of Dignity champions across Schools and Professional Services divisions;
 - The establishment of a LGBT Staff Forum, a Trans and Non-Binary Staff Network, a BAME Staff Network, and a network for staff with disabilities. The University is also in the process of establishing a network for staff who are carers;
 - The embedding of EDI issues into the University's major new Strategic Framework and its four core University-level strategies;
 - The holding of regular staff surveys with a substantial EDI element, including on experiences of bullying and/or harassment, and an infrastructure for taking concerted action in response to the staff survey results, through working groups in each area that make recommendations directly to the University leadership;
 - The commissioning, undertaking and publication of a major research study of the University's institutional culture, with a strong EDI focus - the Changing University Cultures (CHUCL) Report (2018);
 - Progress with Athena Swan – see detail below;
 - Adoption of a Trans and Non-Binary Equality Policy Statement.
- 1.3.2 The University of Sussex holds an Athena SWAN bronze University award (since April 2013, last awarded November 2016, valid until November 2019). Examples of initiatives that have been undertaken as part of the University's Athena SWAN agenda include:

- A revision to the academic promotion procedure to allow individuals to declare personal circumstances (for example, periods of maternity leave) and for these to be taken into account by promotion panels;
- An annual review of all staff in STEMM (Science, Technology, Engineering, Mathematics, and Medicine) Schools employed on fixed-term contracts to assess whether the University can offer them a transfer to an indefinite contract;
- New staff development sessions on unconscious bias;
- A communications masterclass for women in STEMM;
- Workshops on the academic promotions procedure;
- A mentoring circles scheme for female post-doctoral staff in STEMM disciplines;
- Focus groups with women who have recently returned from maternity leave;
- The creation of four Daphne Jackson fellowships for female scientists who have taken a career break.

In addition to the University's institutional bronze award, the following Schools have achieved bronze department-level awards:

- School of Engineering and Informatics (November 2014)
- School of Mathematics and Physical Sciences (November 2017)
- School of Psychology (April 2016)

The School of Life Sciences was the first School at Sussex to receive a departmental silver award (November 2015). The Brighton and Sussex Medical School also holds a silver award (November 2017).

- 1.3.3 A final equalities impact assessment (EIA) on the Code of Practice and processes used for preparation of the University's submission to REF2014 was conducted in February 2014. This found no evidence of unequal treatment of staff within these preparations, although it did note the importance of the appeals processes in addressing some individual cases where staff with protected characteristics had made an appeal against the decision on whether to select their outputs for REF inclusion (as per the REF2014 rules). These findings have been reflected in ensuring that the appeals processes set out here (though they have different purposes to those for REF2014, reflecting the REF2021 requirements) are fair, robust and transparent, and in also ensuring that these are complemented by other mechanisms for staff to raise concerns about conflicts of interest amongst output quality assessors or concerns about possible errors of fact in assessment processes (see 4.1.16-19).

1.4 How the institution is addressing the principles of Transparency, Consistency, Accountability, and Inclusivity in demonstrating fairness.

- 1.4.1 Transparency: The draft Code of Practice has been drawn up in consultation with the University's staff body, and has been published on the University's intranet to facilitate viewing and feedback. Additionally, all relevant staff have had their attention drawn to the Code by emails explaining its significance and encouraging staff to read and comment on the document.
- 1.4.2 Consistency: The Code describes, and the University will implement, consistent processes across the institution, and these will reflect our consistent contractual framework. The University has chosen to recognise all staff on standard teaching and research contracts as

holding significant responsibility for research, thus taking an approach that is straightforwardly consistent and inclusive (see 2.1)

- 1.4.3 **Accountability:** Responsibilities are clearly defined and clear routes for staff to raise questions and concerns with regard to the areas covered by the Code of Practice (as detailed further below) will be publicised via email and the University's intranet.
- 1.4.4 **Inclusivity:** The University's approach to recognising significant responsibility for research is an inclusive one. The University further encourages an inclusive environment by ensuring that Equalities and Diversity training and monitoring, as applied to the areas and processes covered by the Code, is rigorous and comprehensive. The University has already provided, and will continue to provide, tailored communications, and opportunities to raise questions, for early-career researchers, on how the REF and Code of Practice relate to their roles.
- 1.5 **How the code is being communicated to staff across the institution (including to those on leave of absence).**
 - 1.5.1 The Code is being communicated via the University intranet and direct emails to relevant staff, supported by further communication on University social media accounts. Central briefing sessions on the draft Code are available for staff to attend, and these will be matched by briefing sessions on the final Code after this is agreed.
 - 1.5.2 The Code will be referenced specifically in letters (normally sent via email) to individual staff confirming whether they are determined to have significant responsibility for research and/or independent researcher status (see further below), drawing their attention to the standards the University has set in this process and to transparent, straightforward routes to raise concerns and, if necessary, make an appeal.
 - 1.5.3 Human Resources will send specially targeted communications to all staff who are absent from work during the period of the Code's development and application.

Part 2: Identifying staff with significant responsibility for research

2.1 Policies and Procedures

- 2.1.1 The University intends to submit 100% of Category A eligible staff¹ employed on the REF2021 census date of 31 July 2020.
- 2.1.2 Accordingly, all staff on standard Teaching and Research contracts at the University will be considered to have significant responsibility for research. The standard Teaching and Research contract used by the University is deemed to clearly indicate significant responsibility for research.
- 2.1.3 For avoidance of doubt, a job/role title does not in itself necessarily indicate whether someone is Category A eligible and has significant responsibility for research.
- 2.1.4 In any cases where a staff member began their employment on a standard Teaching and Research contract but has since had a formal variation of contract, and the variation clearly demonstrates that the changed contract no longer involves significant responsibility for research, the individual will no longer be considered to hold such responsibility or to be Category A eligible for REF purposes.
- 2.1.5 ‘Clearly demonstrating that the changed contract no longer involves significant responsibility for research’ means that the substantive content of the individual’s responsibilities, as formally set out in contractual documentation, could not reasonably be understood to involve significant responsibility for research. Recognising this will not rely on defined amounts of time assigned to particular duties, but rather on the substantive content of the role as a whole. Such recognition does not constitute an assessment of the individual’s performance in their role, but is rather solely concerned with accurately identifying the formal expectations of the role. Individuals may still undertake some scholarly activity (including publication), and support broader research activity within the University, without having significant responsibility for research.
- 2.1.6 Recognising significant responsibility for research will be based on the individual’s contract as the definitive statement of the formal expectations of their role. It will not be based on an assessment of the individual’s performance or a measurement of their activity.
- 2.1.7 For any individuals who have a variation of contract between the date of submission of this Code of Practice (7 June 2019) and the REF census date (31 July 2020), this will be done through the appropriate existing processes, and the full range of relevant circumstances will be taken into account. A contract can (and will) only be changed by mutual agreement; neither party can change any contract unilaterally. The interests of the REF submission will not alter, reduce or distort the University’s responsibilities in this area, or the integrity of its

¹ The Guidance on Submissions for REF2021 sets out the definition of a Category A eligible staff member on p.29, para. 117: ‘Category A eligible staff are defined as academic staff with a contract of employment of 0.2 FTE or greater, on the payroll of the submitting institution on the census date, whose primary employment function is to undertake either ‘research only’ or ‘teaching and research’. Staff should have a substantive research connection with the submitting unit (see paragraphs 123 to 127). Staff on ‘research only’ contracts should meet the definition of an independent researcher (paragraphs 128 to 134)’.

processes. Re-use of REF outputs assessments in other contexts is restricted by the provisions of the University's existing Code of Practice for Research Assessment.

- 2.1.8 All research-only staff who are deemed to be independent researchers through the relevant processes (see below) will also be deemed to hold significant responsibility for research. All staff deemed to hold significant responsibility for research will also be deemed to be undertaking independent research.

2.2 How decisions are being made and communicated to staff, including timescale.

- 2.2.1 Identification of which individuals hold significant responsibility for research will be undertaken after the Code of Practice is approved. Subject to this approval, the University intends to undertake this identification during autumn 2019.
- 2.2.2 The identification of whether a given individual is Category A eligible and holds significant responsibility for research will be communicated to the individual by letter during autumn 2019 (or later for individuals whose employment begins at a later point but before 01/08/2020). Heads of School will be asked to hold a discussion with the individual in any cases where the identification might be unexpected to the individual (given that the University intends to submit 100% of eligible staff, such cases are expected to be rare).
- 2.2.3 The University will operate an appeals process available to staff from approximately the end of November 2019 to the end of January 2020 (exact dates, and clear guidance on how to submit an appeal, will be included in the letters to staff, and advertised on the University intranet and through staff email). Where individuals wish to make an appeal but were unable to do so during this period (due to their employment beginning later, or due to significant personal circumstances), late appeals will be permitted as far as practically possible (see also 2.6.2).
- 2.2.4 The approach to identifying staff with significant responsibility for research will not vary between units at Sussex.
- 2.2.5 The University may make one or more joint submissions with other institutions whose staff are subject to their own REF Code of Practice; however, all staff employed by the University of Sussex in a Category A role will be treated equally within the processes outlined in this Code of Practice, irrespective of whether they are included in a joint submission or one made by Sussex alone.

2.3 Stages of Approval

The Code of Practice has been developed through a Working Group of Senate, chaired by the Deputy Pro-Vice-Chancellor (REF2021) and supported by the Director of Human Resources, the Director of Research and Enterprise, and the REF Academic and Operational Manager. Draft material for the Code of Practice has been regularly reviewed by the Research and Knowledge Exchange Committee and occasionally by the full Senate. The process of approval is as follows –

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| February 2019: | Key elements of the Code of Practice endorsed by the University Executive Group and shared with Senate. |
| February-March 2019: | The Senate Working Group revises the draft through its deliberations. |

- April-May 2019: The draft Code is shared online with the whole Sussex staff community. Comments are fed back to the Senate Working Group, which considers the feedback and agrees revisions as appropriate.
- May 2019: The Senate Working Group recommends a final version of the draft to the University Executive Group. UEG responds with comments as necessary and the draft is finalised by the Deputy Pro-Vice-Chancellor (REF2021) and the REF Academic and Operational Manager.
- 5 June 2019: The Senate Working Group and University Executive Group jointly recommend a final draft to the full Senate for approval.
- 7 June 2019: The Code is submitted to Research England.

Development of Processes

- 2.4 How processes to be followed have been consulted on and agreed with staff representative groups
- 2.4.1 The University has sought broad agreement from the staff community and particular agreement from specific staff representative groups.
- 2.4.2 The University's principal academic decision-making body is the Senate, which has reviewed key elements of the Code in February 2019 and the full Code in June 2019. Before and during this period, Senate has been represented through a Working Group, primarily composed of elected Senators (see Appendix 2 for the full composition and Terms of Reference), which has closely overseen the drafting of the Code. This group includes UCU's Equalities Representative for Sussex. A key part of the group's role has been to develop and review the processes set out in this Code.
- 2.4.3 The draft Code has also been discussed at the local Joint Negotiating Committee (JNC) with representatives of the University and College Union (UCU). Several queries and concerns raised by the UCU representatives have been taken into account in the submitted version of this Code.
- 2.4.4 The Code has also been reviewed by other key bodies, including the Research and Knowledge Exchange Committee, which is a committee of Senate that includes the Director of Research and Knowledge Exchange for each School.
- 2.4.5 The Code has been shared with the whole Sussex staff community for comment and feedback, via a widely-advertised online release of a draft Code, and through Q&A sessions on the Code open to (and advertised to) all staff, led by the Deputy Pro-Vice-Chancellor (REF2021) and the REF Academic and Operational Manager. Feedback from this process has been reviewed by the Senate Working Group and has significantly informed the submitted version of this Code.
- 2.4.6 Following this process, on 5th June 2019 Senate agreed its support for this Code as submitted.

Staff, Committees and Training

- 2.5 Procedures for appointing designated staff and committees / panels responsible for identifying staff with significant responsibility for research

- 2.5.1 The University is not proposing to convene a specific committee to consider this matter; nevertheless, it will undergo a process of identification as described above. This is because, as all staff on standard Teaching and Research contracts will be regarded as holding significant responsibility for research, and there will be a clear contractual basis for any view that a given individual does not hold significant responsibility for research, the identification of staff with this responsibility is a relatively straightforward task.
- Those with decision-making roles in this process are: The Vice-Chancellor, the Provost, the Deputy Pro-Vice-Chancellor (REF2021), and the Director of Human Resources.
 - Those with advisory roles are: The Director of Research and Enterprise; the REF Academic and Operational Manager; Staff within Human Resources as assigned by the Director of Human Resources; the Heads of School; the Directors of Research and Knowledge Exchange (one per School); Heads of Department (where applicable); and REF UoA Leads.
 - The primary decision-maker for normal business in this area will be the Deputy Pro-Vice-Chancellor (REF2021), acting in collaboration with the Director of Human Resources. The primary advisor for normal business in this area will be the REF Academic and Operational Manager. Business will only be escalated to the Vice-Chancellor and/or Provost if unusually complex or significant decisions on identifying significant responsibility for research arise. None are anticipated at the time of writing this Code.
 - These responsibilities are approved by the Senate, as part of their overall approval of the Code of Practice.
- 2.5.2 Role descriptions for individuals involved in these processes are provided in Appendix 1. Terms of Reference for relevant committees are provided in Appendix 2.
- 2.5.3 Specialist training, on equalities issues as they relate to the REF, for individuals involved in this process (across both key decision-making and advisory roles) will be commissioned jointly by the RQI Team (within Research and Enterprise Services) and the EDI Unit (within Human Resources). This will be delivered primarily during early autumn 2019 and will cover issues relating to equality legislation and relevant employment law (e.g. Equality Act 2010 and Public Sector Equality Duty; fixed-term workers regulations), diversity in the workplace, and unconscious bias, as well as tailored training on how these issues relate to the REF.

Appeals (on identification of significant responsibility for research)

- 2.6 Details of those involved in hearing any appeals (demonstrating their independence from earlier decision processes), timescales, and how decisions are being communicated to staff.
- 2.6.1 The availability of the appeals process will be communicated via the University intranet, through direct emails to the staff community, and through inclusion in the letters sent to individuals explaining whether they have been recognised as holding significant responsibility for research and/or being an independent researcher. Specific instructions on how to request an appeal will also be included in the letters.
- 2.6.2 The appeals process will be available to staff from approximately the end of November 2019 to the end of January 2020. Where individuals wish to make an appeal but were unable to do so during this period (due to their employment beginning later, or due to significant personal circumstances), later appeals will be permitted as far as practically possible. Every

effort will be made to receive and consider such a later appeal, provided that the individual was genuinely unable to make an appeal within the normal window, that it is realistically possible for the panel to convene, and that there is time to process the decision without jeopardising the accuracy of the submission.

- 2.6.3 Appeals may be made either by staff who have been recognised as having significant responsibility for research and wish to dispute this recognition, or by staff who have *not* been recognised as having significant responsibility for research and wish to dispute that decision.
- 2.6.4 Staff members considering making an appeal will be encouraged, but not obliged, to discuss their reasons for querying the decision on identifying significant responsibility for research informally with the RQI Team and/or their Head of School and/or a Human Resources advisor before submitting an appeal, to identify whether the query can be resolved outside the appeals process. This mechanism is wholly optional.
- 2.6.5 Appeals will be submitted directly and confidentially by email to the Chief Operating Officer.
- 2.6.6 Eligible grounds for appeal would include that the decision-makers failed to consider, or were unaware of, evidence which indicates that the appellant is on a teaching and research contract and thus holds significant responsibility for research. Given that 100% of staff on teaching and research contracts will be deemed to have significant responsibility for research, it is anticipated that any appeals on this issue will relate to a disagreement over the factual status of an individual's contract, and will be very rare.
- 2.6.7 Membership of the appeals panel follows below (2.6.8). This is informed by the Research England requirements and by the appeals panel structure used at Sussex for REF2014. A key principle is that decision-makers on appeals are not the same decision-makers leading the REF process as a whole.
- 2.6.8 Membership of the appeals panel:
- The Chief Operating Officer (Chair);
 - One other member of the University Executive Group, not otherwise involved in REF matters, as nominated by the Chief Operating Officer;
 - Two elected members of the Senate, as nominated by the Senate;
 - The Director of Human Resources or their nominee (advisory capacity only).
- 2.6.9 Members of the appeals panel will receive tailored training on the equalities and diversity dimensions of their work, arranged by the EDI Unit, and will also receive training on the REF context from the REF Academic and Operational Manager (but the latter will not participate in, advise on, or otherwise be involved in handling appeals received, other than being informed of an appeal's outcome once a conclusion is reached).

2.7 Equality impact assessment

- 2.7.1 An equalities impact assessment (EIA) on the population of academic staff (including Teaching and Research and Teaching-only staff), reviewing those who are deemed to have significant responsibility for research and those who are not deemed to have significant

responsibility for research, will be undertaken at regular intervals, beginning during the Mock REF in summer 2019. All the EIAs will be made available online for Sussex staff members to view. This EIA will consider all of the protected characteristics for which the University holds robust data. Research-only staff will be subject to a separate but parallel equalities impact assessment, given that they are subject to a specific test of their research independence and that the identification of significant responsibility for research is combined with the latter. Further details on this are given below.

- 2.7.2 The EIA will be designed and delivered by the Equality, Diversity and Inclusion unit (based within Human Resources), working in partnership with the RQI Team.
- 2.7.3 It will be regularly reported to the Research and Knowledge Exchange Committee and to the University Executive Group, and (in summary form) to Senate.
- 2.7.4 As the split between those who are identified as having significant responsibility for research and those who are not should map exactly on to the split between Teaching and Research and Teaching-only, it is not anticipated that immediate action will normally be taken on the basis of the results of the EIA. These results will, however, be used by UEG and the other bodies receiving the analysis to inform the develop of medium- and longer-term internal policy on ensuring that the academic environment is inclusive and supportive for both Teaching and Research and Teaching-only staff, and features active attempts to improve equalities and diversity.
- 2.7.5 If the EIA indicates an especially extreme or unexpected imbalance in the spread of protected characteristics between the staff populations that are and are not identified as having significant responsibility for research, the Deputy Pro-Vice-Chancellor (REF2021), on behalf of UEG, along with the Director of Human Resources and the REF Academic and Operational Manager, will review the process used to identify staff as holding Teaching and Research contracts and therefore as having significant responsibility for research, in order to ensure that it is accurate and robust.
- 2.7.6 'Teaching-only staff' in this context includes those who hold 'Teaching and Scholarship' contracts or equivalent, which are clearly distinct from 'Teaching and Research' contracts.
- 2.7.7 The final EIA will be published online after the submission has been made.

Part 3: Determining research independence

3.1 Policies and Procedures

- 3.1.1 The status of all research-only staff will be systematically reviewed to consider whether or not they are employed as independent researchers, using the full range of potential indicators set out by Research England. Any individual who meets one or more of those indicators, and who is considered to fulfil the substantive nature of being an ‘independent researcher’ by having responsibility for the design and direction of their research, will be recognised as an independent researcher for REF purposes.
- 3.1.2 A researcher who holds a competitively-funded research grant, as the Principal Investigator (including, but not necessarily limited to, a holder of one of the competitive research fellowships listed by Research England as indicating independence) will certainly be regarded as an independent researcher; so too will a researcher who is employed to lead a self-directed research project or programme, irrespective of whether or not they are externally-funded. In the latter case, the individual may or may not be explicitly named as a Principal Investigator, but they must be explicitly employed to undertake self-directed research.
- 3.1.3 An initial view of whether an individual on a research-only contract is or is not an independent researcher will be taken by the Research Quality and Impact (RQI) Team, based on the indicators of the individual’s responsibilities and activities that are visible to the team via the University’s internal data systems. This view will then be checked with the Head of School and School Director of Research and Knowledge Exchange, who will be explicitly asked whether any of the indicators that are less visible in the internal systems might apply to the individual. Following this process, a provisional view of whether the individual is or is not an independent researcher for REF purposes will be taken.
- 3.1.4 A letter will then be sent to each member of research-only staff confirming whether they are determined to be an independent researcher for REF purposes or not. The letter will include reassurance that this determination has no bearing on any matter relating to the individual’s employment and does not constitute a view of their performance in their role, and has no relevance beyond the REF itself. This letter will include an option to query the decision – initially by the informal process of asking the RQI Team to review the decision; if following that informal review the individual remains dissatisfied with the determination made, then a formal appeal may be submitted. Once the appeals process has concluded, the determination of whether or not the individual is an independent researcher will be final.
- 3.1.5 This process will run from approximately October 2019-January 2020. The research independence of new members of research-only staff appointed between January and 31 July 2020 will be reviewed on an individual basis immediately following their appointment.

Staff, committees and training

3.2 Procedures for appointing designated staff and committees / panels responsible for identifying staff who are undertaking independent research

- 3.2.1 The initial view of each research-only staff member’s research independence will be taken by the RQI Team acting under the oversight of the Director of Research and Enterprise and

of the Deputy Pro-Vice-Chancellor (REF2021), in consultation with the Schools as set out above and with Human Resources if necessary. The RQI Team will also be responsible for keeping systematic records of the process, including decisions taken and their rationale. Further information on the role of the RQI Team is provided in Appendix 1.

- 3.2.2 The composition of the appeals panel will be as specified above as per the appeals panel to review appeals relating to significant responsibility for research. There will be a single appeals panel for all REF-related appeals.
- 3.2.3 This process has been approved by the Senate (on 5th June 2019), following particular scrutiny from the Senate Working Group for the REF Code of Practice, which is composed of elected Senators and chaired by the Deputy Pro-Vice-Chancellor (REF2021), with the REF Academic and Operational Manager and the Director of Human Resources (or her nominee) acting in an advisory capacity. Further details on this group and these roles is provided in the appendices to this Code.
- 3.2.4 All individuals involved in this process, whether in decision-making or advisory capacities, will participate in Equalities and Diversity training, covering issues relating to equality legislation and relevant employment law (e.g. Equality Act 2010 and Public Sector Equality Duty; fixed-term workers regulations), diversity in the workplace, and unconscious bias, as well as tailored training on how these issues relate to the REF. This will be primarily delivered in early autumn 2019.

Appeals (on identifying independent researchers)

- 3.3 Details of those involved in hearing any appeals (demonstrating their independence from earlier decision processes), timescales, and how decisions are being communicated to staff.
 - 3.3.1 The availability of the appeals process will be communicated via the University intranet, through direct emails to the staff community, and through inclusion in the letters sent to individuals explaining whether they have been recognised as holding significant responsibility for research and/or being an independent researcher. Specific instructions on how to request an appeal will also be included in the letters.
 - 3.3.2 The composition of the appeals panel will replicate the composition described above for appeals on recognition of significant responsibility for research.
 - 3.3.3 As for appeals on significant responsibility for research, members of the appeals panel will receive tailored training on the equalities and diversity dimensions of their work, arranged by the EDI Unit, and will also receive training on the REF context from the REF Academic and Operational Manager (but the latter will not participate in, advise on, or otherwise be involved in handling appeals received, other than being informed of the outcome of an appeal once a conclusion is reached).
 - 3.3.4 The appeals process will be available to staff from approximately the end of November 2019 to the end of January 2020. Where individuals wish to make an appeal but were unable to do so during this period (due to their employment beginning later, or due to personal circumstances), later appeals will be permitted as far as practically possible. Every effort will be made to receive and consider such an appeal, provided that the individual was genuinely unable to make an appeal within the specified timeframe, that it is realistically possible for the panel to convene, and that there is time to process the decision without jeopardising the accuracy of the submission.

- 3.3.5 The appeals process will be open to both research-only staff who are recognised as independent researchers and wish to dispute this decision, and to research-only staff who have *not* been recognised as independent researchers and wish to dispute that decision.
- 3.3.6 Staff members considering making an appeal will be encouraged, but not obliged, to discuss their reasons for querying the decision on recognising research independence informally with the RQI Team and/or their Head of School and/or a HR advisor before submitting an appeal, to identify whether the query can be resolved outside the appeals process. This mechanism is wholly optional.
- 3.3.7 Appeals will be submitted directly and confidentially by email to the Chief Operating Officer.
- 3.3.8 Eligible grounds for appeal would include that the decision-makers failed to consider, or were unaware of, evidence which indicates that the appellant potentially meets the criteria for being recognised as an independent researcher. This could include evidence about formal expectations of the individual's work as communicated by or agreed with relevant managers and/or reflected in formal structures governing the individual's working activities.
- 3.3.9 A specific EIA on the research-only staff population will be undertaken after the initial decisions on whether or not to recognise an individual as an independent researcher have been made, and then again at the conclusion of this process. If this assessment suggests that there may be disproportionate effects of the process on those with protected characteristics, the process will be reviewed and the independent researcher status of relevant sections of the population may also be subject to further review.
- 3.3.10 The final EIA will be published online after the submission has been made.

Part 4: Selection of Outputs

4.1 Policies and procedures

- 4.1.1 Responsibility for overseeing, and assuring the quality of, internal outputs review lies with the Deputy Pro-Vice-Chancellor (REF2021) on behalf of the Vice-Chancellor, Provost, and University Executive Group; and administrative responsibility for co-ordination of review at institutional level lies with the RQI Team, within Research and Enterprise Services.
- 4.1.2 Responsibility for undertaking and commissioning internal outputs review lies with School outputs review teams managed by the Head of School and the School's Director of Research and Knowledge Exchange, and by the designated UoA Lead for each Unit of Assessment.
- 4.1.3 All selections of outputs for REF submission will be made following a transparent internal review process that also includes expert external input. This process will be transparent to the authors of the work being reviewed, and to the internal academic community in general.
- 4.1.4 The internal review process is based on the principles of transparency and rigour. Its aim is to produce estimates of the likely grade for each output under consideration if and when that output is assessed by a REF panel.
- 4.1.5 For REF2021, each School will review outputs against the remit of one or more Units of Assessment (UoAs) for which the School is the designated lead; this will in some cases include reviewing outputs authored by individuals employed outside the School but whose work is being considered for inclusion in a UoA submission on which the School is leading.
- 4.1.6 Outputs produced by any REF-eligible University of Sussex staff members should be considered for potential selection in the unit(s) of assessment wherever their academic fit, and chances of performing highly in assessment, is the strongest. For a majority of staff there will be a clear alignment between their employing School and/or department and the UoA that is most suitable for consideration of their outputs on the latter criteria. For a significant minority of staff, multiple UoAs will be, in principle, suitable for consideration of the outputs for potential REF selection. The Director of Research and Knowledge Exchange (and/or the relevant UoA Lead(s)) in the employing School will normally be responsible for identifying the range of UoAs for which an individual's outputs are of interest and for referring them to other UoA Leads as appropriate, including those who may be based outside the employing School.
- 4.1.7 Beyond the requirement to submit at least one output for every Category A individual employed on the census date, all outputs in scope for the REF2021 submission will be considered equitably and according to the same criteria. This includes outputs produced by former staff, who were employed by Sussex as Category A at the time of publication during the REF period, including any such staff who have been made redundant; their outputs will be regarded as fully eligible.

- 4.1.8 An individual author may discuss with their Director of Research and Knowledge Exchange (DRKE), or the relevant UoA Leads, the range of UoAs for which they feel their outputs are relevant. If the individual author is dissatisfied with the outcome of the discussion, they may write to the Deputy Pro-Vice-Chancellor (REF2021), via the RQI Team, to request further consideration of the matter. There is no obligation to comply with the individual's wishes, but the request will be given due consideration.
- 4.1.9 In the event that two or more UoA Leads wish to include the individual's outputs in their UoA submission, the matter will be referred to the Deputy Pro-Vice-Chancellor (REF2021), who will give due consideration to the rationale presented by each UoA Lead. In cases of exceptional significance or complexity, the Deputy Pro-Vice-Chancellor (REF2021) may choose to refer the matter to the University Executive Group for review.
- 4.1.10 The process of internal outputs assessment is normal business at the University of Sussex, and not only undertaken for REF purposes, but is adapted to fulfil such purposes as necessary. Key aspects of the process, and provisions to ensure appropriate use of the data produced, are set out in the University's Code of Practice for Research Assessment (approved in February 2017).
- 4.1.11 Schools have scope to design internal output review processes to match their specific disciplinary requirements, but they all operate within the Code of Practice for Research Assessment, and, for REF purposes, they will also operate within this Code of Practice for REF2021.
- 4.1.12 Although output review processes are specific to the relevant UoA, processes are regularly compared and discussed amongst the DRKEs and UoA Leads, who regularly meet (at least monthly) with the Deputy Pro-Vice-Chancellor (REF2021) and REF Academic and Operational Manager. These meetings provide opportunities for sharing good practice and for ensuring an appropriate level of consistency across the institution.
- 4.1.13 Each School and UoA process is also subject to formal scrutiny from the Deputy Pro-Vice-Chancellor (REF2021) and from the University Executive Group, via regular management reporting. A key focus of this scrutiny is on ensuring that the process facilitates rigorous assessment and realistic estimated grades.
- 4.1.14 All School-based internal output review processes, irrespective of areas of variance in practice, include some expert external input. The latter is delivered by 'External Research Advisors' (ERAs). A central template specification for the role of ERAs is managed by the RQI Team (Schools have the option to amend this specification for their particular purposes). It includes clear expectations of ERAs and provides mechanisms to address any potential conflicts of interest. This Code (first in its draft, and then its final approved, form) will be shared with all ERAs and they will be asked to observe its provisions.
- 4.1.15 All Schools are expected to have reasonable subject coverage across the remit of each relevant UoA in the expertise of their internal and external reviewers. Where there are substantive gaps in this coverage Schools are expected to identify and remedy this, including through referral to reviewers used for other UoAs if relevant.

- 4.1.16 All Schools are required to attend to the gender balance amongst their internal and external reviewers, and no UoA should use internal and external reviewers who are all of the same gender.
- 4.1.17 Every staff member whose outputs are reviewed may request one second external opinion (or more in the unlikely event that both existing reviewers have a demonstrable conflict of interest), and the UoA Lead should accommodate this where practically possible. It will not normally be practical to fulfil such requests after August 2020.
- 4.1.18 All outputs finally selected for REF submission will have been externally reviewed at least once and will also be subject to rigorous internal review processes (see below). Schools are free to determine whether or not all outputs in scope for potential REF submission are reviewed, and to determine which sample of them is reviewed; but every individual Category A-eligible member of staff may request that an output is reviewed by an external advisor if this is not otherwise planned, and request a second external opinion if they identify a possible conflict of interest held by the first external reviewer. This is subject to the output being REF-eligible in principle (according to the criteria set out by Research England) and a review being practically possible within the time available. It will not normally be practical to undertake such a review after August 2020. Requests for review are not to be refused unless the output is ineligible for REF or review is impossible within the time available or for other substantial practical reasons.
- 4.1.19 Each School and UoA outputs review team, for which the relevant Head of School has oversight, is responsible for recommending selections of outputs for submission and for the quality assessments associated with those selections. Use of externals does not change this responsibility. School outputs review teams are fully responsible for choosing to accept or reject an external assessment; there is normally no obligation either way, but a reasoned and informed choice must be made. Schools will, however, be obliged to disregard an external assessment if compelling evidence suggests that it reflects personal bias or has been driven by factors other than fair and informed judgement of the work.
- 4.1.20 Schools are free to recommend, and the University is free to decide, the number of outputs in the submission that are associated with a given individual as their author, within the constraints of the REF rules and having due regard to the equalities and diversity profile. Individuals may query an assessment of an output, but the outputs review team within the School is only obliged to respond to this query if a conflict of interest is identified amongst the assessors or if an apparent error of fact is identified. Outputs review teams are not otherwise obliged to respond to, or take account of, views of the quality of an output that differ from those of the assessors, or views of the selection of outputs, including the association of an output with one co-author rather than another in the REF submission. This does not reduce the commitment to full transparency of process, nor does it preclude discussions of output quality with individual authors if all involved agree to engage in such a discussion.
- 4.1.21 Assessment practices must reflect the University's position as a signatory to the San Francisco Declaration on Research Assessment (DORA).

- 4.1.22 The recommended outputs profiles for each proposed UoA submission will be submitted by the lead School to the Deputy Pro-Vice-Chancellor (REF2021) and REF Academic and Operational Manager for review and confirmation at regular intervals following an initial 'REF Trial Run' (or 'Mock REF') in June 2019. The policies and procedures set out here will be followed so far as possible for this Trial Run, and an EIA will be undertaken on the data arising from the Trial Run. Normally the University Executive Group will delegate authority to the Deputy Pro-Vice-Chancellor (REF2021) to review these profiles on its behalf, but the Executive Group will receive regular summary reports and will review the whole profile at least once prior to the final REF submission being made.
- 4.1.23 Outputs selection profiles will be subject to regular Equality Impact Analysis (see further detail below).

Staff, committees and training

- 4.2 Procedures for identifying designated staff and committees / panels responsible for selecting outputs (distinguishing between those with advisory and those with decision making roles). Details of training provided to individuals and committees involved in the output selection process.
- 4.2.1 Outputs selections are ultimately decided by the Vice-Chancellor, Provost, and University Executive Group, who will normally delegate day-to-day responsibility to the Deputy Pro-Vice-Chancellor (REF2021) as described above.
- 4.2.2 The selection of outputs will be based on (but may, if necessary, diverge from) recommendations from the School within which each unit of assessment submission is led, based on the internal and external review processes for that UoA.
- 4.2.3 The REF Academic and Operational Manager is the principal advisor to the Deputy PVC (REF2021) in this process. The RQI Team is responsible for keeping records of the process.
- 4.2.4 The Research and Knowledge Exchange Committee has oversight of the process and will regularly report to Senate on it.
- 4.2.5 The UoA Lead is responsible for convening a review group, one for each UoA, to include both the internal and external output assessors. Each School is responsible for keeping records of each group's activities.
- 4.2.6 Specialist training, on equalities issues as they relate to the REF, for all individuals involved in this process (across both key decision-making and advisory roles) will be delivered primarily during early autumn 2019 and will cover issues relating to equality legislation and relevant employment law (e.g. Equality Act 2010 and Public Sector Equality Duty; The Fixed-Term Employees Regulations 2002, diversity in the workplace, and unconscious bias, as well as tailored training on how these issues relate to the REF.

Disclosure of circumstances

- 4.3 Procedures for taking into account staff whose circumstances have affected their ability to research productively throughout the period in relation to the unit's total output requirement. Procedures for taking into account the effect of circumstances that have had

an exceptional effect on the ability of an individual staff member to research productively throughout the period so that they do not have the required minimum of one output. Procedures for staff to disclose circumstances in a confidential manner.

- 4.3.1 All Category A eligible staff at Sussex will be supported and encouraged – but not required – to disclose individual circumstances that have affected their ability to undertake research during the REF period.
- 4.3.2 There will be an individual circumstances disclosure and review process, established with robust confidentiality arrangements. This will be widely advertised to all staff through the University intranet and by email, and by reminders in various staff meetings such as School Meetings and the VC’s Forum. This will include clear information about relevant circumstances as described in the Guidance on Submissions, as well as guidance on disclosing more complex circumstances. Staff will be invited to disclose their individual circumstances wherever they consider it appropriate (and if necessary, they will be supported by their School in doing so), but there will be no pressure on individuals to do so.
- 4.3.3 The Deputy Pro-Vice-Chancellor for Equalities, Diversity and Inclusion is closely involved in the design and delivery of the individual circumstances disclosure and review process, and will be a key member of the individual circumstances review panel.
- 4.3.4 A pre-disclosure confidential conversation with the REF Academic and Operational Manager and an HR advisor will be available and advertised to staff, to discuss the process prior to their making a formal disclosure of a circumstance to the review group. This may be particularly useful for staff with complex circumstances. To prevent any possible conflicts of interest, the staff member may also request that alternative advisors from the Professional Services participate in the discussion. In this case, the REF Academic and Operational Manager will ensure the latter are fully briefed on the REF guidance and relevant policies and processes.
- 4.3.5 A confidential, easily accessible online mechanism will be available for all staff to formally disclose any individual circumstances they wish.
- 4.3.6 Individual circumstances disclosed through this mechanism will be considered by a review group on an anonymised basis. Only the REF Academic and Operational Manager, RQI Administrator, and HR Advisor will normally have access to the non-anonymised data. This access may be extended to others where a) the individual making the disclosure requests it; b) it is agreed with the individual that additional advice needs to be sought and the nature of the requirement means this cannot be done on an anonymised basis; c) in the unlikely event that in order to meet the University’s legal or ethical obligations it is necessary to share the non-anonymised data with others. All data disclosed will be destroyed by the end of June 2022, unless there is an exceptional requirement to retain data for longer in a particular instance. In the latter eventuality, the data will only be retained for as long as strictly necessary to meet the requirement; Senate will be notified of the extension, and all efforts will be made to ensure the individual who made the disclosure is aware of this. See also Appendix 4 on use of data.

- 4.3.7 The University has no explicit expectations for the contribution of individuals to the REF output pool other than the need to meet the minimum of one output per person (unless circumstances have meant that the individual has been unable to produce an output during the period). The University does not expect all staff to contribute equally to the pool of outputs available for submission, nor is there any penalty or disadvantage for staff who contribute fewer outputs than others. All staff on teaching and research contracts, and staff on research-only contracts who are independent researchers, are expected to actively publish their research; however, specific expectations for individual publication activity are determined between the individual and their Head of Department or equivalent, under the overall guidance of the Head of School. Such expectations take into account other aspects of the individual's work priorities across their teaching, research, and administration portfolio, beyond contribution to REF, as indicated in the University's internal Code of Practice for Research Assessment.
- 4.3.8 Where an individual wishes to declare circumstances for REF purposes, they will be asked at the point of declaration whether they wish for the circumstance to also be disclosed to their Head of School/Head of Department or equivalent, in order for it to be taken into account in adjusting workload expectations, if this has not already been done prior to the declaration for REF purposes. Before the information is shared, the RQI Team will check with the individual (normally via email) whether any elements of their declaration should be specifically excluded from disclosure to the Head of School/Head of Department or equivalent, and information about the specific nature of sensitive circumstances will not be shared unless the individual agrees that this is essential to understand the appropriate workload adjustment.
- 4.3.9 Adjustments to workload expectations will be made as appropriate to the impact of the individual's circumstances, irrespective of whether the circumstances result in a request to remove the minimum of one output requirement, or to reduce the total number of outputs required for a unit, or neither of those outcomes. Where the individual staff member indicates that they are happy for this to take place, the Head of Department (or equivalent) will review the matter and make adjustments as appropriate; guidance from the University's EDI Team, endorsed by the Deputy Pro-Vice-Chancellor (Equalities and Diversity), will emphasise the need to make such adjustments wherever necessary. It will also be highlighted to the individual that if the minimum of one output is removed as a result of their declared circumstance, this fact (though not any details of the circumstance, unless it meets one of the further criteria noted in 4.3.6, above) will need to be shared with those involved in selecting outputs for submission.
- 4.3.10 The review group for submitted individual circumstances will include –
- The Deputy Pro-Vice-Chancellor (REF2021) (Chair);
 - At least two members of academic staff with expertise on EDI issues;
 - An advisor from the EDI unit;
 - A second advisor from Human Resources (as designated by the Director of Human Resources);
 - The REF Academic and Operational Manager.

The individual disclosing their circumstances may request that any group members who have a conflict of interest recuse themselves from the discussion of their circumstances. If this occurs, the group members will be replaced by staff in equivalent roles (or as near equivalent as possible).

- 4.3.11 The review group will be provided with contextual information on the profile of the unit with regard to known circumstances (such as, but not limited to, the proportion of staff who work part time, the proportion who are early-career researchers, and the proportion who have taken maternity leave), and on the profile of protected characteristics (where the data is both held and where the numbers are not so small as to make individuals identifiable). All this contextual data is to be provided on an anonymised basis. Its purpose is to enable the review group to assess the significance of circumstances disclosed by individuals in the context of the unit in which they work, as this is a key part of determining whether to request a reduction in the overall output requirement of the unit.
- 4.3.12 This group will consider whether individual circumstances are such that they should result in a) a reduction in the unit's total output requirement and/or b) removal of the requirement for a minimum of one output to be associated with the individual in the REF submission.
- 4.3.13 The outcomes of the group's assessment will be shared with the individual who made the disclosure by the REF Academic and Operational Manager or RQI Administrator, unless the individual has indicated that they would prefer not to be informed of the outcome.
- 4.3.14 The RQI Team will be responsible for making requests for any reductions in unit circumstances, or removal of the requirement to submit a minimum of one output, as required by the review group.
- 4.3.15 Following the REF submission being made, a summary report on the outcomes and content of the individual circumstances process will be prepared for submission to Research England, and will also be reviewed internally by the Research and Knowledge Exchange Committee as part of a broader 'lessons learned' exercise during 2021.

Equality Impact Assessment

- 4.4 How an equality impact assessment on the spread of outputs across staff (in relation to their protected characteristics) has been used to inform the final selection of outputs to be submitted.
- 4.4.1 An EIA will be regularly undertaken on the spread of outputs across staff in relation to all the protected characteristics where the University holds usable data.
- 4.4.2 This will be undertaken at both institutional and unit level.
- 4.4.3 All staff data used in an EIA will be in anonymised form.
- 4.4.4 The first such equality impact assessment (EIA) will be undertaken in July-August 2019, and at regular intervals thereafter (at least once every three months, and more frequently if and as necessary). A final equality impact assessment will be undertaken in autumn 2020, prior to submission.

- 4.4.5 The EIAs produced will be shared with the Research and Knowledge Exchange Committee, the REF and Impact Strategy and Advisory Group, and with UEG (for the July-August 2019 EIA, the final EIA, and as requested for intervals in between) and Senate (for the July-August 2019 EIA and final EIA, and if requested for intervals in between). The EIAs will also be available to any Sussex staff member who requests to view them, and the final EIA, immediately prior to submission, will be published online.
- 4.4.6 Where the EIA indicates a significant disparity between the profile of protected characteristics as they relate to those staff associated with outputs selected for submission as against the total population of Category A-eligible staff in the same unit, the output reviewers used in that unit will be asked to reconsider a sample of the in-scope outputs, with the sample weighted, where possible, towards authors associated with the under-represented characteristics. In cases of very significant disparity between the profile of protected characteristics as they relate to those staff associated with outputs selected for submission versus the total population of Category A-eligible staff in the same unit, alternative and/or additional output assessors will be sought.
- 4.4.7 Following the latter process, School review teams will be asked to report to the Deputy Pro-Vice-Chancellor (REF2021) and REF Academic and Operational Manager to confirm a) if their recommendations for output selection have changed as a result of the additional review; b) if their recommendations for output selection have not changed, how they have ensured that the process has been rigorous and how it has taken into account the need to mitigate against unconscious or other bias that may have led to the work of some staff being under-represented.

Appendix 1: Role Descriptions for Key Individuals and Teams

Key Individuals and Teams - Institution-wide Remit:

The Vice-Chancellor and President

The Vice-Chancellor and President is the University's chief academic and executive officer. He is also a member of the University's governing body, the Council, and is Chair of the Senate and of the University Executive Group.

The current Vice-Chancellor and President (since September 2016) is Professor Adam Tickell.

The Provost

The Provost is the deputy to the Vice-Chancellor and President, and a member of the University Executive Group (UEG). The Provost acts as the line manager for the Heads of School.

The current Provost is Professor Saul Becker.

The Pro-Vice-Chancellor (Research)

The Pro-Vice-Chancellor (Research) is currently on sabbatical and accordingly is not included within the governance and management structure for REF2021 preparations set out in this Code. Institutional REF leadership is therefore delegated to the Deputy Pro-Vice-Chancellor (REF2021).

The Deputy Pro-Vice-Chancellor (REF2021)

The Deputy Pro-Vice-Chancellor (REF2021) is the institutional lead for all aspects of REF2021 preparations at the University of Sussex. He has day-to-day responsibility for implementation of the University's strategy for REF preparations and plays a leading role in many of the areas and processes set out in this Code. He reports directly to the Vice-Chancellor and President and to the Provost.

The current Deputy Pro-Vice-Chancellor (REF2021) is Professor Gordon Harold.

The Deputy Pro-Vice-Chancellor (Equalities and Diversity)

The Deputy Pro-Vice-Chancellor (Equalities and Diversity) leads initiatives to promote and sustain equalities, diversity and inclusion at Sussex.

The current Deputy Pro-Vice-Chancellor (Equalities and Diversity) is Professor Claire Annesley.

The Chief Operating Officer

The Chief Operating Officer (COO) is responsible for all the Professional Services divisions at Sussex. He is also Secretary to the University's Council and responsible for governance matters.

The current Chief Operating Officer is Dr Tim Westlake.

The Director of Human Resources

The Director of Human Resources leads the Human Resources division and has overall responsibility for staffing matters at Sussex. She also has oversight of the Equalities, Diversity and Inclusion (EDI) unit, which is based within Human Resources.

The Director of Human Resources is Ms Sheila Gupta.

The Director of Research and Enterprise

The Director of Research and Enterprise leads the Research and Enterprise Services division. She has oversight of the REF support functions based within that division and also works with other Professional Services directors to ensure REF is supported by relevant teams across the institution, including ITS and the Library. She manages and supports the REF Academic and Operational Manager in ensuring REF preparations are co-ordinated and robustly delivered across these teams.

The current Director of Research and Enterprise is Ms Susan Angulatta.

The REF Academic and Operations Manager

The REF Academic and Operations Manager is the day-to-day co-ordinator of REF preparations at Sussex and undertakes planning and management across all aspects of those preparations. This includes both academic planning, in close liaison with the Deputy Pro-Vice-Chancellor (REF2021), and operational and technical planning, working closely with the Director of Research and Enterprise and Professional Services colleagues across the University.

The REF Academic and Operations Manager also manages, and directly contributes to, editorial preparation of the narrative sections of the submission, including impact case studies and Environment templates. In liaison with Human Resources and the University's legal counsel, he also co-ordinates REF governance matters, including leading on the preparation of this Code.

The REF Academic and Operations Manager is Dr Dominic Dean.

The Research Quality and Impact Team

The Research Quality and Impact Team includes the REF co-ordination and editorial support functions within Research and Enterprise Services. It includes three full-time staff members working directly on REF preparations, led by the REF Academic and Operations Manager.

Key Individuals and Teams – School and Unit Remit:

Head of School (One per academic School)

Each Head of School provides overall strategic, academic and operational management for their School. They play a key role in setting research expectations and research support within the School, and in designing and implementing strategies for the recruitment and development of staff.

Director of Research and Knowledge Exchange (one per academic School)

The Director of Research and Knowledge Exchange (DRKE) provides research leadership, management, and support in their School, under the direction of the Head of School. This includes oversight of the REF Unit of Assessment leads based within their School and in the assessment processes used there, including the selection and use of external assessors (known as External Research Advisors or 'ERAs'). The DRKE supports the Head of School in ensuring that research expectations are clearly implemented and appropriately supported by structures and resources to help individual staff deliver research, publications and impact of high quality.

Unit of Assessment (UoA) Leads

The Unit of Assessment Leads are academic members of staff tasked with preparing their REF submission to a specific Unit of Assessment. They play the major role in organising and managing

output quality assessments, recommending selections of outputs based on those assessments, drafting Environment Templates and co-ordinating the preparation of impact case studies, and ensuring these processes are robust, fair, and transparent.

Appendix 2: Terms of Reference and Record-Keeping Procedures for Committees and Groups

Senate

Terms of Reference

The powers and functions of Senate, as defined in Statute VI and Regulation 4, include the following: to direct and regulate teaching and examination, promote research, authorise the award or annulment of degrees, regulate admissions and the discipline of students, discuss and declare an opinion on any matter whatsoever relating to the University and "do such other acts as the Council may authorise". Senate will normally exercise these powers and functions by receiving, considering and confirming reports from the Vice-Chancellor and its main committees. Chairs of committees which report to Senate must therefore act as spokespersons: if unable to attend a Senate meeting, they should brief a deputy to report on their behalf. Senate is also responsible for the conduct of academic staff relations with Council and external bodies and receives reports from Council. Members of Senate may approach its Secretary at any time with suggestions for items of business for consideration.

Role of Senators

(a) All members (*ex officio* and elected):

- to be aware of institutional objectives and issues;
- to speak freely on policies and proposals presented to Senate;
- to contribute to making and taking responsibility for Senate's decisions, taking into account of the needs and priorities of the whole University;
- to attend all meetings of Senate unless absence is due to illness, urgent personal reasons or teaching commitments;
- to be willing to be appointed as members of Senate committees or sub-groups;

(b) Additional roles for elected members:

- to attend School meetings;
- to comment on policies and proposals informed by discussions at School meetings and other meetings within the School as appropriate;
- in advance of Senate meetings, to read the papers and prepare for the business to be transacted, to consult their constituents for views on the scheduled business (this is facilitated by Senate papers being openly accessible to all members of staff and students via Sussex Direct).
- during Senate meetings, to contribute as necessary and to report the views of any constituents;
- after Senate meetings, to feedback to their constituents within the provisions of the Standing Orders of Senate bearing in mind that the only official report of the meeting is the Minutes of the meeting.

Composition

The Statute states that, in addition to certain *ex-officio* members, it shall consist of elected members as set out in Regulation 4. The following are at present members of Senate *ex-officio*: the Vice-Chancellor (Chair), Provost, Pro-Vice-Chancellors, Heads of the Schools of Studies, Convenor of the

Foundation Year, Librarian, Director of IT Services, the Director of the Sussex Centre for Language Studies, the President of the Students' Union: the Undergraduate Education Officer of the Students' Union and the Postgraduate Education Officer of the Students' Union.

Council has agreed arrangements for the attendance at Senate meetings of speaking observers appointed by the recognised trade unions.

Senate may establish committees of its members and may appoint as full members of such committees persons who are not members of Senate. Senate may delegate to any such committee any powers or functions which it is itself empowered to perform.

Record-keeping

Formal minutes of Senate are taken by a dedicated secretariat led by the Head of Governance Services. Minutes are published online promptly after the meeting for the University community to view via the 'Sussex Direct' website. Queries on the minutes can be raised by any member of Senate, including elected Senators representing various constituent groups within the academic and Professional Services activities of the University.

The Senate Working Group on the REF Code of Practice

The Senate Working Group is a temporary sub-group of Senate formed to oversee preparation of this Code of Practice.

Terms of Reference

1. To oversee the drafting of a REF Code of Practice that the group is confident to recommend to Senate for approval.
2. To ensure the Code of Practice incorporates and reflects all of Research England's requirements for the conduct of REF preparations.
3. To ensure the Code of Practice is suitably aligned with other University policies and commitments, including legal commitments. This also could require recommending adjustment to other existing policies to bring them into line with the COP.
4. To consider feedback from academic and research staff and from UCU regarding the appropriate conduct of REF preparations and the commitments made in the COP.
5. To ensure the COP commits the University to a process of selection of material for submission to REF that is fair and appropriate whilst maximising the potential quality of the submission, based on rigorous internal assessment.
6. To ensure that matters of equality and diversity are considered in the provisions of the COP, including appropriate training of staff making REF decisions and measures to avoid bias, including unconscious bias, affecting the process of selecting material for the submission.
7. To make a draft version of the COP available to all academic and research staff prior to its consideration by Senate, in order for their comments to be considered in the process.

Membership and advisory roles

1. Deputy Pro-Vice-Chancellor (REF2021) – Chair
2. REF Academic and Operations Manager – Advisor and Deputy Chair

3. 6x elected Senate members from across the Sciences, Social Sciences, and Humanities Schools
4. Director of Human Resources (Advisor)
5. Director of Research and Enterprise (Advisor)

Record-keeping

Minutes of the meetings of the Senate Working Group are produced by the REF Academic and Operational Manager and are circulated to the group after each meeting. All members of the Working Group have the opportunity to raise queries on the minutes. Summary reports on the group's deliberations are made to the full Senate as required.

Research and Knowledge Exchange Committee

Key Role

The Research and Knowledge Exchange Committee shall promote and develop a strong research and knowledge exchange culture and ethos across the University, encouraging activity that is consistent with an internationally outstanding institution and a profile that matches the best universities at home and abroad. To promote and exchange best practice in relation to the development of early career researchers.

Terms of Reference

- (a) To develop, communicate and regularly review the University Research Strategy, including the aim, objectives and operational plan, all of which will complement the University Strategic Plan;
- (b) To identify and draw to the attention of the appropriate University body the resources necessary to support the University Research Strategy;
- (c) To monitor the national and international environment in order to respond appropriately;
- (d) To undertake systematic and regular reviews and to recommend Key Performance Indicators as evidence of research inputs, outputs and impacts and other indicators of research and knowledge exchange vitality within the University;
- (e) To approve School research strategies, to receive regular reports from School Research Committees about progress against the School strategy and to discuss progress with the Heads of Schools; to refer matters of research governance to Research Governance Committee for consideration;
- (f) To disburse funds for research and knowledge exchange as may be allocated by Council;
- (g) To receive reports for information from Research Governance Committee; to provide advice to Research Governance Committee on University policies and procedures for research governance and ethics;
- (h) To approve, on behalf of Senate, the establishment, amendment or closure of university research centres;
- (i) To promote and exchange best practice in relation to the enhancement and management of research and knowledge exchange activities.

Composition

Pro-Vice-Chancellor (Research) (Chair); Director of Research and Knowledge Exchange from each School; Director of Research and Enterprise; Director of Interdisciplinary Research.

Co-opted (as required): Individuals (usually not exceeding the number of School Directors of Research and Knowledge Exchange), distinguished in research and enterprise, reflecting the breadth of skills necessary in promoting and developing a strong research and knowledge exchange culture and ethos across the University.

In attendance: Chair of the Doctoral Studies Committee (if not otherwise a member or nominee); University Librarian (or nominee); Director of IT Services (or nominee);

Reports to: Senate (reports will also be sent to Performance Committee and Council when appropriate).

Note: the frequency of and participation in individual meetings will be determined by the nature and volume of work, ensuring its timely and effective prosecution on behalf of the University community. The full Committee will meet no less frequently than once every academic year.

Record-keeping

Full minutes are taken by the Secretary to the Committee and are made available to all members of the University community via Sussex Direct. The minutes are reported to Senate following every meeting, with and the Committee makes recommendations to Senate as required.

University Executive Group

Terms of Reference

- (a) To advise and assist the Vice-Chancellor in the day-to-day management of the University, in the initial formulation of policy and in the preparation of business for consideration by University statutory and other committees;
- (b) To provide a formal management link between members of the Executive and the Heads of the Schools and other operating units.

Composition

- The Vice-Chancellor and President (Chair);
- The Provost;
- The Pro-Vice-Chancellors;
- The Chief Operating Officer
- The Director of Finance;
- The Director of Human Resources.

Record-keeping

Minutes are taken by the Secretary to the University Executive Group.

REF and Impact Strategy and Advisory Group

The REF and Impact Strategy and Advisory Group is a group of experts from across the academic Schools who advise the Deputy Pro-Vice-Chancellor (REF2021) and discuss REF strategy. The members are selected based on expertise in research strategy and impact, and appointed through

negotiation with UEG, the Deputy Pro-Vice-Chancellor (REF2021), the Head of the School in which each individual is based, and the individuals themselves.

Record-keeping

Notes of the meetings are taken by the REF Academic and Operational Manager and/or the RQI Administrator, and recommendations and report are brought to the Research and Knowledge Exchange Committee as and when there is relevant business.

The REF Appeals Panel

Composition

- The Chief Operating Officer (Chair);
- One other member of the University Executive Group, not otherwise involved in REF matters, as nominated by the Chief Operating Officer;
- Two elected members of the Senate, as nominated by the Senate;
- The Director of Human Resources or their nominee (advisory capacity only).

Terms of Reference

- (a) To review and respond to appeals against a University decision on the recognition or non-recognition of an individual having significant responsibility for research;
- (b) To review and respond to appeals against a University decision on the recognition or non-recognition of an individual on a research-only contract being an independent researcher;
- (c) To ensure that equalities and diversity considerations, reflecting the training given to the panel members, are taken into account in reviewing the appeals;
- (d) In the event of an appeal being upheld, to recommend to the Deputy Pro-Vice-Chancellor (REF2021), RQI Team, and any other relevant teams the appropriate actions to be taken to reflect the upheld appeal.
- (e) To communicate, via the Chair, the outcome of each appeal reviewed.

Record-keeping

A secretary from within the Vice-Chancellor's Office or Human Resources will produce notes of the meetings and decisions taken. These will be kept confidential to the Appeals Panel and (normally following decisions being made) to the Deputy Pro-Vice-Chancellor (REF2021), the REF Academic and Operational Manager, and the RQI Administrator.

The Individual Circumstances Review Group

Composition

- The Deputy Pro-Vice-Chancellor (REF2021) (Chair);
- The Deputy Pro-Vice-Chancellor (Equalities and Diversity);
- Two (or more, if the scale of circumstances reported requires) members of academic staff with expertise on EDI issues
- An advisor from the EDI unit (within Human Resources);
- a second advisor from Human Resources (as designated by the Director of Human Resources)
- The REF Academic and Operational Manager.

Record-keeping

Notes of the meetings and of the decisions will be produced by the REF Academic and Operational Manager and/or the RQI Administrator. Individuals will only be discussed in the meetings in anonymised form, and the notes will reflect this. Along with any information disclosed as part of the individual circumstances disclosure and review process, they will be stored securely in encrypted files and behind password protection. The data protection arrangements described in section 4.3 and in Appendix 4 will apply.

Appendix 3: Note on the Role of the Brighton and Sussex Medical School (BSMS)

The Brighton and Sussex Medical School (BSMS) is a joint venture between the University of Sussex and the University of Brighton, with the relationship governed by a Memorandum of Understanding (MoU). Academic and research staff employed within BSMS are normally employed by the University of Sussex and, wherever this is the case, the University of Sussex REF2021 Code of Practice applies to them in full and on an equal basis with any other Sussex employee. For avoidance of doubt, the REF2021 Code of Practice used by the University of Brighton does not apply to these staff, including in the event that they are included within a joint submission across the two institutions. In such an event, the two universities will co-ordinate to ensure that the preparation of the submission does not compromise adherence to the respective Codes of Practice. In the context of any joint submission and more broadly throughout REF preparations, the two institutions will work together in a leadership team comprising of individuals from both institutions, reflecting their shared and interlinked research environment and the nature of BSMS as a joint venture. This is likely to require the sharing of relevant data between the two institutions. Any such data sharing will be conducted in accordance with each institution's obligations under the GDPR.

Appendix 4: Use of Data and the University of Sussex Privacy Notice

The University will ensure that all personal data used for REF purposes is processed in accordance with the data protection principles outlined in article 5 of the General Data Protection Regulation (EU) 2016/679 (GDPR). All the processes outlined in this Code are subject to the University's Data Protection Policy, which is available from our internal website.

All personal data collected for REF2021 preparations will be destroyed in June 2022, unless there is an exceptional requirement to retain data for longer in a particular instance. In the latter eventuality, the data will only be retained for as long as strictly necessary to meet the requirement, and Senate will be notified of the extension. If the data has been disclosed as part of the individual circumstances process, all efforts will also be made to notify the individual of the extension.

The purpose of the Research Excellence Framework 2021 (REF2021) is to assess the quality of UK research and to inform the selective distribution of public funds for research by the four UK higher education funding bodies. The REF is managed by Research England's REF team, based at Research England (RE), on behalf of the four UK higher education funding bodies. RE is part of UK Research and Innovation (UKRI), and under this arrangement UKRI has the role of 'data controller' for personal data submitted by us to the REF.

If you are a researcher who has been included as part of our submission to the REF 2021, in 2020 and potentially also in 2021, we will send some of the information we hold about you to UKRI for the purpose of making that REF2021 submission. The information will not be in coded form and your name and details such as your date of birth, research group associations, and contract dates will be provided along with details of your research and impact activities. If you are submitted with individual circumstances that allow a reduction in the number of outputs submitted, without penalty, some details of your personal circumstances will be provided. Data transfers between the University and UKRI will be made via the REF2021 submissions website, and the University will take all possible steps to ensure these transfers are done in a secure way.

Further information on the data being collected is available on the REF website, at www.ref.ac.uk in particular publication 2019/01, 'Guidance on submissions'.

Sharing information about you

UKRI may pass data, or parts of it, to any of the following organisations that need it to inform the selective distribution of public funds for research and to carry out their statutory functions connected with funding higher education:

- Department for the Economy, Northern Ireland (DfE)
- Higher Education Funding Council for Wales (HEFCW)
- Scottish Funding Council (SFC).

Some staff data (Unit of Assessment, HESA staff identifier code and date of birth) will also be passed to the Higher Education Statistics Agency (HESA) to enable it to verify coded data returned to it as part of our HESA staff return (see www.hesa.ac.uk). Data returned to the REF will be linked to that held on the HESA staff record to allow UKRI and the organisations listed above to conduct additional

analysis into the REF and fulfil their statutory duties under the Equality Act 2010 (England, Wales and Scotland) or the Northern Ireland Act 1998 (Northern Ireland).

UKRI and the organisations listed above will use the information to analyse and monitor the REF2021. This may result in information being released to other users including academic researchers or consultants (commissioned by the funding bodies), to carry out research or analysis, in accordance with the Data Protection Act 2018 and the GDPR. Where information not previously published is released to third parties, this will be anonymised where practicable.

UKRI will require that anyone who has access to personal data held in UKRI's records, paper or electronic, will respect its confidentiality and will only process it in accordance with instructions issued for the purposes specified by UKRI.

Some personal data will be passed to the REF expert panels and the Equality and Diversity Advisory Panel (whose members are independent of UKRI) for the purpose of conducting a systematic evaluation of submissions, in accordance with predetermined criteria and methods. Panels will make judgments about the material contained in submissions and will not form quality judgments about individuals. All panel members are bound by confidentiality arrangements.

Publishing information about your part in our submission

The results of the assessment exercise will be published by UKRI, on behalf of the four UK higher education funding bodies, in December 2021. The published results will not be based on individual performance nor identify individuals.

Those parts of submissions that contain factual data and textual information about research activity will also be published by UKRI, on behalf of the four UK higher education funding bodies, and will be made available online. Published information is likely to include textual information including impact case studies in which you may be referenced. Your name and job title may be included in this textual information. Other personal and contractual details, including your date of birth and all information about individual staff circumstances will be removed. The RQI Team will undertake a thorough check of all documents submitted to REF2021 to ensure that they comply with this policy. Any personal details that should not be included found at this time will be redacted.

UKRI will also publish a list of the outputs submitted by the University in each UOA. This list will not be listed by author name but may include standard bibliographic data (including the author name).

Data about personal circumstances

Staff may voluntarily disclose personal circumstances, which could permit the University to submit staff information to the REF without the 'minimum of one' requirement (without penalty), or to submit a reduced number of outputs without penalty. In seeking either of these options, the University will need to provide UKRI with data that the individual has disclosed about their circumstances, to show that the criteria have been met for reducing the number of outputs. Please see the *Guidance on Submissions* (paragraphs 151-201) for more detail about reductions in outputs.

Submitted data will be kept confidential to Research England's REF team, the Equalities and Diversity Advisory Panel, and main panel chairs. All these bodies are subject to confidentiality arrangements. Within the University, the RQI Team will ensure that information relating to individual circumstances is handled in anonymised form wherever possible, and that any non-anonymised data, or data that could make individuals identifiable, is stored securely in encrypted files with password protection, and that physical copies of this material are avoided as far as possible, or are held securely and

promptly destroyed after use if their use is unavoidable. Research England's REF team will destroy the submitted data about individuals' circumstances on completion of the assessment phase.

As set out above, unless redacted, the information to be published by UKRI, on behalf of the four UK higher education funding bodies, will include a single list of all the outputs submitted by the University. The list of outputs will include standard bibliographic data (including the author name) for each output, but will not be listed by author name.

Accessing your personal data

Under the Data Protection Act 2018 and the GDPR, individuals have the right to see and receive a copy of any personal information that UKRI holds about you. Further information about the Act and GRPR, and guidance on making a subject access request, can be found on the RE web-site at <https://re.ukri.org/about-us/policies-standards/foi-data-protection/>

If you have any concerns about your information being used for these purposes, please contact:

Data Protection Officer

UK Research and Innovation

Polaris House

Swindon, SN2 1FL

Email: dataprotection@ukri.org

UNIVERSITY OF SUSSEX PRIVACY NOTICE

[Please note that at the time of submitting this Code of Practice, the University's Privacy Notice is currently under review. Therefore, readers are advised to check the University's data protection webpages for the latest version.]

This notice outlines the University's processing activities relating to personal data and covers the following:

- [overview](#)
- [the basis for processing your personal data](#)
- [personal data we collect about you and how we use it](#)
- [retention of personal data](#)
- [disclosure and transfer of personal data](#)
- [your rights including access to information and correction](#)
- [cookies](#)
- [other websites](#)
- [changes to our privacy notice](#)
- [how to contact us.](#)

Overview

The University of Sussex is registered as a data controller with the Information Commissioner's Office (ICO). Our registration reference is Z6428144.

You can refer to the University's [Data Protection Policy](#) for more information about our commitment to processing personal data in a way that is compliant with the General Data Protection Regulation.

The Data Protection Officer for the University of Sussex is Alexandra Elliott, Head of Information Management and Compliance. If you have any queries concerning your personal data and how it is processed, contact the Data Protection Officer at dpo@sussex.ac.uk.

The basis for processing your personal data

We process personal information to enable us to provide education and support services to our students and staff; advertising and promoting the University and the services we offer; publication of the University magazine and alumni relations, undertaking research and fundraising; managing our accounts and records and providing commercial activities to our clients.

We also process personal information via the use of CCTV systems to monitor and collect visual images for the purposes of security and the prevention and detection of crime, for disciplinary proceedings against staff and students, for monitoring security and for assisting in traffic management and parking enforcement.

We will collect and process personal data about you for the purposes described above. Personal data may include "*special categories of data*" as described under the General Data Protection Regulation, such as information about your racial or ethnic origin, religious beliefs or other beliefs, and physical or mental health.

When we process personal data, there needs to be a legal basis for doing so and, if we process special categories of data, we need to meet additional conditions too. Further information can be found on the [ICO's website](#).

The University processes personal data largely on the basis that it is necessary for the performance of our tasks carried out in the public interest or because it is necessary for our or a third party's legitimate interests. The purpose of the University is to advance learning and knowledge by teaching and research to the benefit of the wider community and examples of processing on this basis include monitoring and evaluating the performance and effectiveness of the University and improving the academic, corporate, financial and human resource management of the University.

We may also process your personal data because it is necessary for the performance of a contract with you or in order to take steps at your request prior to entering a contact. For example, this may include interacting with individuals before they are enrolled as a student, as part of the admissions process, or dealing with any concerns a student may have.

We may also need to process personal data to comply with our legal obligations. This can include compliance and regulatory obligations, such as anti-money laundering laws, immigration obligations and safeguarding requirements, or to assist with investigations carried out by the police or other authorities. We may also process your personal data where it is necessary to protect your or another person's vital interests, or in circumstances where we have your specific consent to do so.

Personal data we collect about you and how we use it

Information is collected in several different ways dependent on your interaction with the University and personal data is processed for the purposes outlined below.

Website usage and enquiries

We collect personal data from visitors to this website through the use of online forms as well as when you email us with an enquiry. We also collect information about the transactions you undertake through this site including details of payment cards used. In addition, we collect information automatically about your visit to our website. Further information about 'Cookies' is set out below.

We may process information collected through this website or other electronic networks used by the University, for the purposes of advertising, marketing, public relations and general advice services as follows:

- the identification of recipients for University services and administration of promotional campaigns,
- the advertising and promotion of the University and its services including by direct marketing means,
- the advertisement and provision of general advice to members of the public about University services,
- the advertisement and promotion of the University through third party products and services, e.g. financial sponsorship,
- fundraising for the University and other organisations (excluding fundraising through alumni).

Applicants, students and staff

We collect personal data via student applications through the UCAS system and our own application systems. Should you subsequently enroll as a student at the University, a student record will be created for you.

The data collected from you as a prospective student or student is used by the University for the following:

Accounts and records

- the administration of student accounts and payments
- to maintain a central student record.

Education

- administration of education and training such as registration
- calculation and publication of exam results, provision of references
- provision of education and training such as the planning and control of curricula and exams, and commissioning, validating and producing educational materials
- administration of applications, e.g. receipt and processing of UCAS forms, compilation of statistics, assessments including preliminary and confirmed offers, liaison with UCAS
- preparation of statutory returns
- administration of student awards and fees

- administration of the discipline and academic misconduct processes
- administration of the academic appeals process
- administration of visiting and exchange students and Study Abroad programme.

Student support services

- administration and management of University- and privately-owned property including accommodation services
- administration of grants and loans, e.g. student loans and access loans
- administration and provision of health care services
- administration and provision of library services including membership records, loan/hire records, information and databank administration
- ticket issue/reservation services
- administration and provision of a student card
- administration and provision of welfare and pastoral services
- careers guidance
- provision of creche facilities
- administration and provision of computing facilities
- administration and provision of student union services
- other commercial or information services, such as the University magazines.

Alumni relations

- the promotion of the relationship between the University and its alumni
- University-related fundraising initiatives involving alumni
- advertising and promotion of alumni events and reunions
- distribution of University mailings, e.g. alumni magazines, newsletters, annual reports, and message forwarding (without disclosure of data)
- the promotion of benefits and services available to alumni from third parties
- eliciting non-financial support, such as careers advice to students and help with student recruitment
- advertising, marketing and public relations for others.

For more detailed information about how we use personal data as part of our alumni relations, see our [alumni services privacy notice](#).

Your information may be used to send you details of products or services that we offer that we have identified as likely to be of interest to you, but you will only be contacted according to the preferences you submit when providing your personal data. If you would like to change these

preferences (e.g. opt out of receiving some communications or change channels used for contact) at any point, you can:

- use the link on the bottom of the last email you received from us
- use Study/Sussex Direct to update preferences
- email alumni@sussex.ac.uk if you are a former student.

Employment applications and staff

We collect personal data via the employment application and recruitment process, and when you enter into a contract as an employee of the University. This data is used by the University for:

- administration of payroll and pensions
- provision of occupational health services
- management of absence records
- administration of flexible working arrangements
- providing access to secured buildings and to parking facilities
- ensuring compliance with the University's Equality and Diversity Policy
- reviewing performance and facilitating promotion and reward
- processing expenses and administrating corporate spending accounts.

Basic personal details can be maintained via Sussex Direct and MyView, and/or by contacting your Human Resources representative.

Research

We may process your personal data for the purpose of research. Further information can be found within our [Research policies](#).

Retention of personal data

The University will only keep your personal data for as long as is necessary for the purpose for which it is processed.

Personal data is processed and stored in line with the University's [Master Records Retention Schedule](#) which sets out how long different categories of personal data should be held by the University.

Disclosure and transfer of personal data

We will only disclose your personal data to a third party when we are required to by law, where we have your specific consent, or to the following:

- companies or suppliers with whom we engage to process data on our behalf – if so, we will ensure adequate arrangements are in place to protect your personal data, such as a data sharing agreement

- relevant government departments and agencies such as the Higher Education Funding Council for England, the Home Office (in connection with visas and immigration) and local authorities (for Council Tax and Electoral Registration purposes)
- professional and regulatory bodies in relation to confirmation of qualifications, professional conduct and the accreditation of courses
- legal representatives
- internal and external auditors.

We are also required to send personal data to the Higher Education Statistics Agency (HESA). HESA collects personal data relating to staff, students and leavers from Higher Education. [Details of how HESA will process your personal data.](#)

From time to time, the University will transfer limited personal data outside the European Economic Area. Where this does occur, the University will adhere to the requirements of the General Data Protection Regulation and ensure that adequate technical and organisational controls are in place.

Your rights including access to information and correction

You have a number of rights under the General Data Protection Regulation, including the right:

- to rectify inaccuracies in personal data that we hold about you
- to be forgotten in some circumstances, that is your details to be removed from systems that we use to process your personal data
- to restrict the processing of your personal data in certain ways
- to obtain a copy of your data in a commonly used electronic form
- to withdraw consent where that is the legal basis of our processing
- to object to certain processing of your personal data by us.

Further information about your rights can be found on the [ICO's website](#). You may also contact the Data Protection Officer for further information.

You have the right to ask to see what personal data we hold about you, known as a subject access request. For more information, refer to our [Data Protection pages](#) for guidance on how to submit subject access requests.

You have a right to complain to the ICO about the way in which we process your personal data. [Information on how to report concerns to the ICO.](#)

Cookies

Cookies are files placed on your computer to collect standard internet log information and visitor behaviour information. This helps us to understand visitor behaviour, to remember your preferences and improve user experience.

For further information about cookies you can visit [AboutCookies.org](#) and to find out more about how the University uses cookies, please refer to the further to the [cookie information web page](#).

Other websites

Our website may contain links to other websites that are outside our control and are not covered by this privacy notice. Our notice only applies to the University of Sussex's website so when you link to other websites, you should read their own privacy policies.

Changes to our privacy notice

We keep our privacy notice under regular review and the notice was last updated on 18 May 2018.

In particular, as the General Data Protection Regulation is new law and the extent of the lawful grounds for processing data has yet to be fully understood, the University may review and update this notice. Any updates will be placed on this webpage.

How to contact us

If you have any questions about our privacy notice or the information we hold about you, you can contact the University's Data Protection Officer by email at dpo@sussex.ac.uk or you can write to Alexandra Elliott, Data Protection Officer, University of Sussex, Sussex House, Falmer, Brighton, BN1 9RH.

Appendix 5 Equality and Diversity Policy of the University of Sussex

Equality and Diversity

1. Policy

The University of Sussex is committed to promoting equality and diversity, providing an inclusive and supportive environment for all. In the implementation of this policy the University will:

- Ensure that people are treated solely on the basis of their abilities and potential, regardless of age, disability, gender reassignment or trans identity, marriage or civil partnership, pregnancy or maternity, race², religion or belief, sex, sexual orientation, trade union membership or non-membership, socio-economic background, or any other inappropriate distinction.
- Promote diversity and equality for students and staff and value the contributions made by individuals and groups of people from diverse cultural, ethnic, socio-economic and distinctive backgrounds.
- Promote and sustain an inclusive and supportive study and work environment which affirms the equal and fair treatment of individuals in fulfilling their potential and does not afford unfair privilege to any individual or group.
- Treat part time staff and students fairly and equally.
- Challenge inequality and less favourable treatment and wherever practicable.
- Ensure individuals experience a level playing field for achieving opportunities.
- Promote greater participation of under-represented groups of students and staff by encouraging positive action to address inequality.
- Promote an environment free of harassment and bullying on any grounds in relation to all staff, students, and visitors.

2. Responsibilities

The Pro-Vice Chancellor with responsibility for equalities issues will, as Chair of the Equality and Diversity Committee, oversee the implementation of this policy. The Equality and Diversity Committee is responsible for monitoring the implementation of all equal opportunities policies and procedures and reporting on the progress made in achieving equalities targets to Senate and Council. The following areas of commitment are most relevant to students:

(i) Monitoring

Regular monitoring will be undertaken in respect of gender, age, race/ethnicity and disability in relation to admissions, course documentation, retention, progression, degree outcomes, first destination, complaints, appeals and harassment cases in order to help identify and thus address any unjustified less favourable treatment and/or inequality.

² Race is defined in law as including colour, nationality, and ethnic or national origin.

(ii) Admissions

The University welcomes applications from students irrespective of background. Specific positive action measures may be put in place for particular groups that are underrepresented, such as disabled students and those from disadvantaged socio-economic backgrounds.

(iii) Widening Participation

The University will maintain and review its Widening Participation strategy, seeking to attract and support students from disadvantaged socio-economic, black and minority ethnic and other diverse backgrounds.

(iv) Teaching, Learning and Assessment

Schools and Departments have equality and diversity objectives as part of their overall plans. Subject and curriculum development will take account of equalities issues where relevant; specifically in relation to race, cultural and religious diversity, disability, gender and sexual orientation. Teaching faculty will have staff development support in this area.

Reasonable adjustments will be made to assessment methods to meet the needs of disabled students and those from diverse ethnic and religious backgrounds.

3. Related Policies

All University policies and procedures will be reviewed to ensure that they comply with the Equality and Diversity policy. The following directly relevant policies and procedures support the University's implementation process:

- Race Equality Policy and Action Plan
- Disability Equality Scheme and Action Plan
- Gender Equality Scheme and Action Plan
- Disability Policy
- Harassment and Bullying Policy

October 2006

Updated February 2011 in accordance with the Equality Act 2010 and June 2014 to add "trans identity" to the list of characteristics.