# Lord Stern’s review of the Research Excellence Framework - response form

The call for evidence is available at: [www.gov.uk/government/consultations/research-excellence-framework-review-call-for-evidence](https://www.gov.uk/government/consultations/research-excellence-framework-review-call-for-evidence)

The closing date for responses is **Thursday 24 March 2016**.

Please return completed forms to:

Hannah Ledger  
Research Strategy Unit  
Department for Business, Innovation and Skills   
1 Victoria Street  
London  
SW1H 0ET

Email: [REFreview@bis.gsi.gov.uk](mailto:REFreview@bis.gsi.gov.uk)

Information provided in response to this consultation, including personal information, may be subject to publication or release to other parties or to disclosure in accordance with the access to information regimes. Please see the consultation document for further information.

If you want information, including personal data, that you provide to be treated as confidential, please explain to us below why you regard the information you have provided as confidential. If we receive a request for disclosure of the information, we shall take full account of your explanation, but we cannot give an assurance that confidentiality can be maintained in all circumstances. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as binding on the department.

I want my response to be treated as confidential

Comments:

Click here to enter text.

## Questions

Name: Dr Ian Carter

Email: i.carter@sussex.ac.uk

Address: Sussex House, Falmer, Brighton. BN1 9RH

Name of Organisation (if applicable): University of Sussex

Please check the box that best describes you as a respondent to this consultation

|  | **Respondent type** |
| --- | --- |
|  | Alternative higher education provider  (with designated courses) |
|  | Alternative higher education provider (no designated courses) |
|  | Awarding organisation |
|  | Business/Employer |
|  | Central government |
|  | Charity or social enterprise |
|  | Further Education College |
|  | Higher Education Institution |
|  | Individual (Please describe any particular relevant interest; teaching staff, student, etc.) |
|  | Legal representative |
|  | Local Government |
|  | Professional Body |
|  | Representative Body |
|  | Research Council |
|  | Trade union or staff association |
|  | Other (please describe) |

If you selected ‘Individual,’ please describe any particular relevant interest; teaching staff, student, etc.

Comments: Click here to enter text.

If you selected 'Other,' please give details

Comments: Click here to enter text.

### Section 1

The primary purpose of the REF is to inform the allocation of quality-related research funding (QR).

1. What changes to existing processes could more efficiently or more accurately assess the outputs, impacts and contexts of research in order to allocate QR? Should the definition of impact be broadened or refined? Is there scope for more or different use of metrics in any areas?

Please tell us your thoughts in no more than 500 words:

This question presupposes that the purpose of REF is solely, or at least primarily, to allocate QR. We contend that this is the case, as there are other substantial effects, direct and indirect: to inform allocation; to provide accountability; to provide benchmarking information; in influencing research cultures and behaviours; and in supporting institutional management.

If it were solely for allocation purposes, then it might be possible to reduce its scope quite considerably. However, there would be strong arguments against such an approach, in particular in terms of credibility within the sector.

A simplistic approach would be to use a small number of proxy measures, which would tend to be volume-based, as they are more acceptably measured. Quality-based measures, such as various forms of bibliometrics, do not adequately represent the full range of subject areas, nor of all forms of output (see The Metric Tide report); and need to be interpreted, rather than used directly. Equally, the measurement of impact is not consistently reducible to simple metrics. Relevant volume measures might be number of staff, amount of research income, number of PhD awards, for example. This might be a lot less costly, but would be much less accurate in terms of a measure of ‘quality’, and would not address impact at all. It also removes the possibility of providing the other effects noted above, and hence removes policy levers from Government.

As we responded to the Green Paper, we believe that the formal link between outputs and people should be broken, to remove the process of staff selection. The assessment is of the institution and its units, not of individuals (we would absolutely not support a move in the direction of New Zealand’s PBRF, which assesses individuals). The 2014 REF introduced a decoupling between the impact cases and the staff ‘submitted’. This approach should be extended to outputs, which would address a number of issues and mitigate concerns about the (perceived) transfer market effects. The future REF should therefore include all activities in that period, from that unit, regardless of whether the individuals involved are still in the unit on a particular, arbitrary, census date. There would thus be a consistent approach to all of the elements of the assessment. Please see Q9 for further information.

A more radical view on the assessment of outputs could be to require evidence-based narratives about the contributions to knowledge in a given subject area. The emphasis of assessment would be on the significance of the findings, the rigour of the research and the standard of supporting evidence. The types of evidence used to demonstrate significance could be similar to those used for impact, such as testimony from experts in the field, while rigour could be demonstrated by a strictly limited number of cited research outputs, data, and other forms of contribution. Institutions that build on breakthroughs elsewhere would be able to submit such work – just as more than one institution is permitted to claim the same impact. Similarly to impact, the period over which the contribution took place may need to be extended, to reflect the long-term development required in some subjects. This approach would support rather than undermine cross-institutional and interdisciplinary collaboration. It would also boost confidence in the REF’s rigour. Since quality judgements would fundamentally be based on the case study narrative itself, panels would have no option but to carry out genuine peer review of the submitted material.

The breadth of definition of impact should be retained, if not extended to be clearer about policy and cultural impacts, and to reflect bodies of work and hence influence, rather than creating a potential impression of relying on a linear model. The effect on pedagogy and educational practice should be more explicitly enabled. It should also be clearer that impact arising from action-based research, where the publication may come after the impact has started, is acceptable.

Where possible, the data used for the assessment process should come from existing collection processes, such as HESA returns (which themselves should evolve to meet current business needs rather than historical sector structures). If there were a national repository for outputs, or a means of creating a virtual one from institutional repositories, that might serve as the vehicle for this purpose, rather than requiring submission of output information as part of a REF process.

1. If REF is mainly a tool to allocate QR at institutional level, what is the benefit of organising an exercise over as many Units of Assessment as in REF 2014, or in having returns linking outputs to particular investigators? Would there be advantages in reporting on some dimensions of the REF (e.g. impact and/or environment) at a more aggregate or institutional level?

Please tell us your thoughts in no more than 500 words:

Any allocation of QR to an institution is likely to require a formula that takes account of disciplinary mix within the institution. In order for that formula to be adequately informed, it will need to have relevant information at a disciplinary or similar level. This has led to the assessment being based on Units. Conversely, if the formula operated only at the institutional level (which might have some advantages with respect to subsequent internal allocation, as a ‘mirror model’ could not be operated), it would need to assume a single cost basis for all subject areas, which would cause a range of obvious problems. Equally, an institutional level assessment result loses the granularity of information that provides many of the benefits identified in Q1, including the ability to identify and support pockets of excellence.

With respect to the outputs element, notwithstanding our comments in Q1 and Q9 about decoupling staff from outputs, we believe that it should be possible to present ‘bodies of work’, which potentially stretch across multiple disciplinary areas. The constraints of the disciplinary-based UoA structure inhibits the presentation of such work. This raises a fundamental question about the nature of the UoA, and whether it is actually only relevant for certain aspects of the environment. The proposal in Q1 to present narratives on the contribution to knowledge also supports the presentation of bodies of work.

We believe that there could be advantages of submission and assessment at aggregated levels, both for reasons of efficiency, and to reflect the institutional nature of some of the issues, policies and approaches, which would otherwise need to be covered in each unit submission. This may be a better way of being able to recognise institutional responses to substantive policy requirements, such as research integrity, equalities and diversity, staff development, open access, and infrastructure provision. Specific aspects of the environment statements may therefore be more appropriate at institutional or main panel levels, with only subject-specific information and contextual data at unit level.

We also believe that there may be merit in considering whether the case studies should be tied to units of assessment, or whether they should be related to broader categorisations, such as economic, public policy, health, and so on. Whilst this undermines the argument about assessment of the unit, it would better reflect the cross-disciplinary nature of the outcomes of research, as evidenced in the 2014 case studies. Ensuring a reasonable balance of contribution across all of the institution’s units would need to be addressed. A first level approach might be to use the main panels, rather than the sub-panels as the unit of assessment.

There would be effects of these approaches on the funding formula, as some of the funding would be allocated at institutional level, some at main panel level, and some at unit level. This change should not be seen as a barrier.

### Section 2

While the primary purpose of REF is QR resource allocation, data collected through the REF and results of REF assessments can also inform disciplinary, institutional and UK-wide decision making.

1. What use is made of the information gathered through REF in decision making and strategic planning in your organisation? What information could be more useful? Does REF information duplicate or take priority over other management information?

Please tell us your thoughts in no more than 500 words:

The REF, and its predecessor RAEs, have provided substantial incentives to individual institutions and to the sector more generally to understand and manage actively its research. Through successive exercises, institutions have been able to identify strengths and weaknesses as a consequence of the reviews that they undertake and the benchmarking that the exercise provides. Many institutions have taken positive and constructive action as a consequence of their improved understanding of their own capabilities, addressing planning, staffing and infrastructure. To a significant extent, these approaches and processes have become a regular part of the natural, active management of research and knowledge exchange and its quality, which is what one would expect in the context of the stewardship of public (and other) funds.

The reputational effects of the REF (at institutional and UK levels) have direct influence on the attraction of people and funds. High quality researchers wish to work in the UK (although some aspects of our environment, including the REF, may be dissuading some), overseas institutions wish to work with UK institutions, and companies use the information to identify collaborators and support investment decisions. The inclusion of impact in 2014 has demonstrated the breadth and depth of socio-economic benefits and value across all subject areas, in terms of public good as well as specific private good (be that commercial or governmental). The inclusion of impact has also spurred engagement, by individuals and institutions, and hence is helping to accelerate the achievement of beneficial socio-economic outcomes. Impact is now becoming embedded in research practice and institutionalised in policies and processes, such as recognition and promotion criteria.

Where there are inefficiencies, it is because of multiple formal requests for information, whether that be the REF, HESA, Research Councils, or other funders or regulators. This can also lead to confusion as to what is the ‘correct’ measure of research activity or performance.

There needs to be rationalisation of data collection, with promotion of re-use. The relationship between HESA records, Research Council records, and the information used for REF and other similar purposes should be improved. The differences in definitions should be removed, and the data quality should also be improved. One might also ask about the relationship of these various records with the ONS, and we would wish to ensure that the information captured as part of the science and innovation audits are appropriately integrated into a single record. As examples, subject classifications should be aligned, and the Research Council provision of information about the use of shared facilities for RAEs and the REF, which has always been problematic, needs to be systematised and made regular. The Nurse Review makes an observation about recognition for peer review service; at a practical level, the Councils could make this information more transparent, and it could be a feed into the REF environment data.

1. What data should REF collect to be of greater support to Government and research funders in driving research excellence and productivity?

Please tell us your thoughts in no more than 500 words:

Whatever data is to be collected, it should be undertaken on a regular and consistent basis. One of the challenges with REF and RAE before it has been the variation between the different reporting requirements, as noted against Q3. Whilst supporting the use of HESA data, we have some concerns that some of its structures are inappropriate for current and future requirements. The structures of HESA returns substantially drive the structures of institutional systems, which can mean that they are less appropriate for managing current business. The separation of research and other services activities, for example, might have been appropriate in the past, but in the context of the impact agenda, both are relevant, hence our suggestion below that HE-BCI data at unit level is considered, even though it is not currently collected at that level. A related concern is the potential divergence of data collection requirements as a consequence of the future Office for Students having principle responsibility with, presumably, Research UK also having some responsibilities.

Collection of additional data will naturally raise the question of the burden of doing so. It must therefore be clear what the uses and benefits of that data are. ‘Nice to have’ is not sufficient.

Our most recent experiences of submission to ResearchFish has undermined the sector’s belief in the ability of relevant agencies to operate an integrated data collection process. Aside from the operational inefficiencies, there are some specific data protection questions arising from the current processes.

Possible areas of additional or alternative data (generally longitudinal, not just single points) might include:

* Number of technical support staff
* Destinations (by sector) of PGR students (although potentially useful, this does represent a collection challenge)
* Proportion of PhDs awarded within specific timescales
* Funding for postgraduate research
* Number of non-academic partners (by sector) formally engaged in funded projects
* Number / proportion of funded projects that are collaborative with other UK universities
* HE-BCI data at unit level

As a note of caution, we observe that the changes in income reporting required by FRS102 could make research income figures incomparable both longitudinally and between institutions. Other approaches to the use of research income data may therefore be required.

### Section 3

The incentive effects of the REF shape academic behaviour, such as through the introduction of the impact criteria.

1. How might the REF be further refined or used by Government to incentivise constructive and creative behaviours such as promoting interdisciplinary research, collaboration between universities, and/or collaboration between universities and other public or private sector bodies?

Please tell us your thoughts in no more than 500 words:

The essential structures of the REF, and of project proposal mechanisms, engender competition between individuals and institutions. We would not wish to remove the competitive element, but it needs to be in balance with the support for collaboration, and the benefits that brings. Shifting the mechanisms of REF to a simple, institutional funding mechanism would remove the ability to use it to incentivise behaviours.

As noted in Q2, the disciplinary UoA structure inhibits the presentation of bodies of work that support a field, rather than a discipline. It might be argued that the organisation of the REF is for the convenience of the assessment and funding process, rather than as a means of best assessing the activity, however it is formed. Further decoupling of the elements of the assessment and funding process might help. Would it be possible to assess the outputs in isolation from the environment, and vice versa, for example? Of course, the creation of ad hoc groupings of relevant experts to assess each submitted element from each institution is unlikely to be practical, but thought should be given to how to assess the research as it is performed in each institution, not as it might be presented in an artificial structure of units.

If institutions, units and individuals believed that the structures and processes responded positively to desired features such as collaboration or interdisciplinarity, then they may be more prevalent in what is submitted and how it is described. The recent report on team science from the Academy of Medical Sciences provides some thoughts on this topic. Including environmental data relevant to the desired features would be one way of addressing this. However, a caveat to this approach is that constraints on access to certain funding mechanisms (e.g. DTPs) would disadvantage the assessment of those institutions that were outside those mechanisms.

Based on our experiences, metrics-based approaches can misrepresent collaborative arrangements. For example, the Research Councils’ data does not accurately represent the partners’ receipt of funding in a collaborative project, whereas the institutional reporting through HESA is more likely to do so.

### Section 4

Previous studies have focused on the costs of REF with respect to the time and resources needed for the submission and assessment processes. The Review is also interested in views and any associated evidence that the REF influences, positively or negatively, the research and career choices of individuals, or the development of academic disciplines. It is also interested in views on how it might encourage institutions to `game-play’ and thereby limit the aggregate value of the exercise.

1. In your view how does the REF process influence, positively or negatively, the choices of individual researchers and / or higher education institutions? What are the reasons for this and what are the effects? How do such effects of the REF compare with effects of other drivers in the system (e.g. success for individuals in international career markets, or for universities in global rankings)? What suggestions would you have to restrict gaming the system?

Please tell us your thoughts in no more than 500 words:

The REF does have an effect on individuals’ choices, and can help to encourage thoughts about quality. However, there are other drivers at work in terms of appointment and promotion, where the perception of the need for quantity rather than quality can still hold. Any move towards reporting the volume of outputs would not be helpful.

Rightly or wrongly, the RAE and the REF have been used as a means to promote particular policy requirements. It is recognised as perhaps the most powerful such policy tool. The most significant current example is Open Access, in which the eligibility of outputs is constrained by the policy. Other, more subtle requirements include approaches to career development, and equality and diversity. Such policy tools will have an effect on individuals and institutions, as that is their purpose.

Comparing the REF to international league tables is problematic, in that the latter are much less nuanced or transparent. A simple rank order of institutions gives no sense of closeness of performance, whereas the profile and even a GPA provides more subtle information.

The current REF structures, based around individuals and a census date, create more possibilities for game-playing than would a structure based on the performance of a unit across the full census period. The greater use of longitudinal data would help to address this. For example, the use of the average FTE of staff on Research & Teaching contracts over a period (whether the whole census period or the most recent two or three years) to determine the required number of outputs and the number of impact case studies; and the inclusion of outputs based on where they were produced would mitigate concerns about the (perceived) transfer market effects.

Using the author’s location at time of publication would also make use of published records easier, as the review would be based on the author’s attribution on the publication itself. It would thus remove the need to match staff lists to authors, but would require the publication’s author attribution to be accurate and complete. It might alternatively be worth considering using location at time of submission or acceptance (which is also relevant to the open access requirement), in order to reflect where the work was actually undertaken, subject to that information being routinely and systematically available.

Selecting the best outputs for the unit correlates with the purpose being to assess the unit, not the individual. In this context, one could choose to select an output that was authored by someone who would have been ineligible in 2014, such as a postdoctoral researcher or a postgraduate student, thus widening inclusion but preventing debates about eligibility. The ‘eligibility’ of the author is less of an issue, because they are not automatically part of the FTE that drives the profile or the funding formula, but the output is part of the research output of the unit.

1. In your view how does the REF process influence the development of academic disciplines or impact upon other areas of scholarly activity relative to other factors? What changes would create or sustain positive influences in the future?

Please tell us your thoughts in no more than 500 words:

The REF can be perceived to constrain disciplinary development, because of the UoA structures and because of inherent conservatism. However, this is probably no more than similar constraints caused by institutional structures and project funding mechanisms. Indeed, within an institution, disciplinary development from a research perspective can be constrained by the naturally teaching-defined organisational structures and by resource allocation mechanisms, both of which can inhibit cross-boundary collaboration and operation.

Approaches to REF that allow greater flexibility in configuration of submissions might help to address this, as well as accommodating interdisciplinary work. The flipside to this is that it will provide challenges to what might otherwise be disciplinary-based panels.

As already noted, the case studies in 2014 were based on a significant proportion of cross-disciplinary research, and hence it might be appropriate to consider impact at the level of the main panel. Ensuring an open definition of impact will help to encourage further engagement, and hence the evolution of disciplinary activities to encompass a wide range of societal outcomes.

In the digital age, research outputs are increasingly non-standard, despite the trend within the REF for a greater proportion to be journal articles. This suggests a possible constraining influence of the REF and similar processes, even though the REF guidance was permissive in this regard. If the REF is genuinely a peer review-based process, then the inclusion of material that has not been through a separate previous peer review process (e.g. self-published or social content) ought to be acceptable. As noted earlier, the ability to include bodies of work, potentially with some narrative explanation as was used for some types of output in 2014, may be helpful.

Section 5

Much of REF focuses on the retrospective analysis of success achieved by institutions either through output or impact. Yet the resources provided anticipate continued success based on that track record. Are there means of better addressing forward-looking institutional plans and priorities, and how these might feed in to national policy?

1. How can the REF better address the future plans of institutions and how they will utilise QR funding obtained through the exercise?

Please tell us your thoughts in no more than 500 words:

The current process is indeed based substantially on an assessment of prior achievement, with a small element of a forward look, as part of the environment.

It would be dangerous to put too much weight on future plans, as that would suggest that very much more detailed planning would be required as part of the REF submission process, and that the exercise would be turned into a macro-project proposal. Such a change would potentially remove the inherent flexibility of the current funding system, in which institutions are able to deploy resources against opportunities as they emerge. Indeed, prior hypothecation would reduce the responsiveness of institutions to external requirements, including those of national policy.

Conversely, there is potential to make better use of the materials submitted. Each sub-panel produces a report on the state of their discipline(s), and perhaps these should be taken further by the Funding Bodies and Research Councils, by drawing on and aggregating the individual submitted plans themselves to create something more substantive. To make this feasible, it may be necessary to require a more structured approach to the narrative description of the current capabilities and plans. These disciplinary and cross-disciplinary landscapes could be linked to the science and innovation audits to give a rich evidence base for national policy.

### Final thoughts

The Review is keen to hear of creative ideas and insights and to be open in its approach.

1. Are there additional issues you would like to bring to the attention of the Review?

Please tell us your thoughts in no more than 500 words:

As already noted in our response to Q1, we believe that the link between outputs and individuals should be removed. The following description provides a little more detail on how this could be achieved, and is drawn from our response to the Green Paper (see <http://www.sussex.ac.uk/staff/research/documents/160112-green-paper-response---research---sussex---final.docx>).

With particular reference to the burden and other effects of staff selection:

* 1. Use the average FTE of staff on Research & Teaching contracts over a period to determine the required number of outputs and the number of impact case studies. HESA data could be used for this purpose. Senior independent researchers in substantive posts might also be included in this figure, if their identification was automatically possible from HESA data.
  2. Select outputs to be reviewed on the basis of the unit where they were produced, not on the basis of the current location of an author.
  3. Allow the selection of the best outputs for the unit, rather than requiring selection against an existing member of staff. For some types of outputs, this may allow for a level of automation.
  4. Use bibliometrics (where valid and appropriate) at the aggregated level of the unit’s submission, not at the article level. This is consistent with expert advice that field-weighted and time-normalised citation counts are more reliable at higher levels of aggregation.

The effects of a, b and c would be to remove staff selection. This would substantially reduce both equality and diversity issues and the burden of adequately addressing those issues: reporting of individual circumstances would not be required because the selection is of outputs, not of individuals. This would also remove the language of staff being ‘submitted’ to the REF, which causes many of the negative side-effects of the process. A further benefit would be not to disadvantage staff moving between HE and non-academic organisations, or those ‘discipline hopping’ (as promoted by the Dowling report).

We note the Government’s announcement in relation to ‘anti-lobbying’ clauses in government funding agreements. We hope that a suitable exception will be agreed for the research base, in the broadest possible terms, otherwise significant elements of the impact agenda will be undermined. It would be ironic if a commercial publisher were able to seek to influence Government with respect to metrics for research assessment, but that a HEFCE-commissioned group were prohibited from informing policy.

Thank you for taking the time to let us have your views. We do not intend to acknowledge receipt of individual responses unless you tick the box below.

Please acknowledge this reply

IND/16/1a