REF 2029
Research Excellence Framework

REF2029 CODE OF PRACTICE

Institution name: University of Sussex

Date of first submission: May 2026

Date of re-submission: September 2026

Part 1: Introduction

This Code of Practice sets out how the University of Sussex will develop its REF2029 submission in a robust, transparent, equitable and inclusive way, complying with the REF guidance, whilst ensuring it represents the excellence of our research. The Code has been written with careful attention to the published REF guidance, while bringing the values and strategy of Sussex to bear on how the REF requirements are applied within the University. All staff at Sussex, particularly those engaged in or supporting research at any level, are encouraged to familiarise themselves with this Code.

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 BSMS is included in Appendix 2.

Postgraduate researchers are also encouraged to read the Code. Questions on it should be raised in the first instance with the Research Information, Quality and Impact (RIQI) Team via rqi@sussex.ac.uk.

The University is committed to the delivery of its charitable objectives, which are set out in our founding Charter. Our Statutes commit us to ensuring that academic staff have freedom, within the law, to carry out teaching and research, including the publication of the outcomes of research, in a way which questions and tests established ideas and received wisdom, and presents controversial or unpopular points of view, without placing themselves in jeopardy of losing their jobs or privileges.

How your CoP supports the principles of:

Robustness

- The inclusion of 100% of our Education & Research staff as having significant responsibility for research demonstrates robustness through the simplicity and inclusivity of approach. The role contains a clear expectation that all staff on Education & Research contracts have responsibility to conduct research, in order to stimulate an inclusive and high-performing research culture.
- Our approach to determining the independence of Research-only staff similarly aims for simplicity, inclusivity and transparency of approach, while allowing a degree of nuance in how this is interpreted for a subset of these staff, as described further in Section 3. For that subset, the approach taken is based on a robust process and clear set of indicators. The process and indicators have been subject to a detailed review since REF2021 and the conclusions of that review have informed this Code of Practice.
- We have more broadly reviewed our processes on the relationship between REF and HESA in view of the use of HESA staff returns to determine the REF volume measure, and have made a number of adjustments to process, allocation of responsibilities, and oversight, all of which support our robust approach to REF data and process (described in Part 4).

Transparency

The draft Code is being communicated by:

- Being published on the University intranet (the final version will be published externally)
- Being highlighted and linked in all-staff update emails from the Vice-Chancellor, the Pro-Vice-Chancellor (Research & Innovation) and Internal Communications team
- Through direct communication to colleagues with specific REF responsibilities such as Associate Deans for Research & Innovation (ADRIs) and Unit of Assessment (UoA) Leads. Being highlighted in events and special sessions for the internal community held by the Pro-Vice-Chancellor (Research & Innovation).
- Being included on the agendas of Faculty-level Research & Innovation Committees, the University Research & Innovation Committee (URIC) and Senate.
- The general communication detailed above will reach all colleagues, including those based outside of the UK. Additionally, 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, linking to it and highlighting the key messages.
- On publication of the Code to the University's staff intranet, users will have the option to request alternative formats of the document, to enhance readability, by emailing rqi@sussex.ac.uk.

Equity and inclusion

Ensuring the Code is supportive of the University's priorities for equality, diversity and inclusion is a key theme of this document. The approach to equality, diversity and inclusion is informed by the principle that promoting equality enables research quality, rather than restricting it.

- Faculty Executive Deans (or their nominees) will be required to review and examine the demographic data of their outputs (in terms of the known characteristics of the authors) on multiple occasions during the output selection for submission process, and their reviews will be discussed at the institutional and Faculty REF Steering Groups.
- Any review of output selection will give thought to representativeness in terms of the broader academic population and the interdisciplinary nature of the University's research.
- The University mandates training in the following areas:
    - Diversity in the Workplace (an introduction to the University's approach and commitment to equality, diversity and inclusion).
    - Unconscious Bias (to increase awareness of unconscious bias and how it impacts people with protected characteristics – mandatory for Grades 7 and above).
    - Recruitment and Selection (all staff involved in recruitment are required to complete this course within one month of employment start date, or upon taking on recruitment responsibilities).
    - In addition to the mandatory training modules, further EDI-related training is available to all staff covering the following areas: disability awareness; trans and non-binary awareness; supporting trans and non-binary people at work; disabled adventures in work and recruitment; Introduction to race equity; neurodiversity: an introduction.
- The University recognises staff circumstances can be diverse and it promotes equal opportunity for all staff, including those who work part-time, flexibly or on fixed term contracts, through its Inclusive Sussex Framework. As a pillar of the Sussex 2035 strategy, the aim is "to become a university in which every student and member of staff can feel that they are in the best place to realise their goals, where they can develop, be themselves and do their best work, and where we fully embrace diversity of background, identity, belief, thought, discipline and method." The framework extends to this Code of Practice, to ensure the review of materials for, and their eventual submission to, REF2029 is carried out in a transparent, consistent and equitable way.

- All Equality Impact Assessments (EIAs) used to support and evaluate our REF2029 approaches will be in line with, and inclusive of, the core EIA questions as laid out in the REF 2029 Equality Impact Assessment Guidance, including the EIA to support the development of this Code. The EIA will be designed and delivered by the RIQI Team supported by the Equality, Diversity and Inclusion unit (based within Human Resources).

Contextualisation within Institutional Policies:

This Code of Practice reflects and adds to a continuously developing equality, diversity and inclusion infrastructure at the University of Sussex:

- This infrastructure is overseen by the University Executive Board and by a dedicated Pro-Vice-Chancellor for Culture, Equality & Inclusion; it is co-ordinated by a dedicated Equality, Diversity and Inclusion (EDI) unit based within Human Resources. This infrastructure is supported and extended by a series of EDI-related networks at institutional level, amongst the academic Faculties and in Professional Services Divisions. This is described in greater detail below.
- Our approach is currently underpinned by the Inclusive Sussex Framework and the Dignity, Respect and Inclusion policy (included here as Appendix 5) supported by a range of guidance, processes and codes of practices related to specific protected characteristics and initiatives. The EDI unit manages the updating of these policies in line with legal and regulatory development and works to ensure all relevant policies take account of their EDI implications, and recognise and manage these appropriately.
- 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.
- Specifically on Strategy, People & Research Environment (SPRE):
    - The University launched its new Sussex 2035 Strategy in September 2025 which reaffirms both research, outlined in the Research and Innovation strategic plan, and EDI to be key institutional priorities.
    - The University's Research Culture Steering Group, which reports in to University Research & Innovation Committee, is a reviewer of this Code of Practice and acts as a point of referral as part of its role in supporting the enhancement of research culture across the institution.
- On responsible research assessment:
    - We are a signatory to the Declaration of Research Assessment (DORA).
    - We have a nuanced and inclusive approach to the assessment of output quality for potential inclusion in the REF submission, as set out further in Section 4.
- On academic workload allocation policies:
    - The University implemented a University-wide approach to academic workload allocation, which set out a number of core principles [PDF 100KB] agreed by Senate in November 2022 and ensures a fair, equitable and appropriate balance of activities relating to education, research and knowledge exchange, scholarship, administrative duties, leadership and management as well as other areas of academic service.

Update on Actions Since REF 2021

The list below is not exhaustive but designed to illustrate the significant range and depth of actions and initiatives which have been put into place since REF2021, either through strategic prioritisation or as items identified as part of the concluding activities of our REF2021 process:

- The leadership of REF sits with the PVC (R&I), with the PVC for Culture, Equality & Inclusion as a permanent member of the University Executive Board.
- The University commissioned and undertook a final Equalities Impact Assessment (EIA) on the REF2021 Code of Practice and processes used for preparation of the University's submission. This was conducted in June 2021 and found no evidence of unequal treatment of staff within these preparations. However, the EIA determined a series of actions to be taken that would enhance EDI either in the immediate aftermath of REF2021 or as necessary steps in our approach to developing our REF2029 submission. The themes covered were:
    - Provision of tailored training on REF and unconscious bias from Advanced HE.
    - Delivery of REF-specific career planning sessions for early-career researchers.
    - A review of the burden of REF on staff relative to EDI-related characteristics as part of the REF2021 Lessons Learned exercise.
    - Communications encouraging wider take-up of the options to record relevant circumstances and to self-declare the protected characteristics amongst the staff community.
    - Workshops for REF-relevant staff on how the EIA and our Lessons Learned exercise can inform local planning to improve EDI support within departments.
    - Integration of experiences of delivering REF during the pandemic and integrating these into working policies and practices.
    - A review of impact and other REF-related training workshops and development programmes for the researcher community.
- Continued support and development in a professional Equality, Diversity and Inclusion (EDI) unit, based within Human Resources (first established in the previous REF period).
- The EDI governance structure has evolved, including a new EDI Board, and a Culture, Equality and Inclusion Leadership Team.
- The University launched its new "Sussex 2035" strategy, in September 2025, which includes substantial EDI strands. The strategy is supported by complementary initiatives, such as the Inclusive Sussex Framework.
- There has been an expansion of, and enhanced focus on, dedicated Staff Forums for colleagues with particular characteristics and/or EDI-related interests, with the number of these increasing from four in the previous REF period to six as of the date of submission. These are our LGBTQ+ Staff Network, Trans and Non-Binary Staff Network, Ethnic Minority Staff Network, Neurodiversity Staff Network, Parent and Carer Staff Network, Staff Disability Network (with a support group for Long Covid).
- There has been a sustained, deeper embedding of a network of Staff EDI Leads across Faculties (with the appointment of 0.5FTE Associate Deans for Culture, Equality and Inclusion in each Faculty) and EDI Champions in Professional Services Divisions (first established in the previous REF period).
- Staff surveys are held at regular intervals with substantial EDI elements, including on bullying and harassment, and an infrastructure for taking concerted action in response to survey results.
- The academic promotions process has been reviewed with the aim of streamlining the process in light of the new Faculty structure. The review is designed to strengthen fairness and transparency.
- The University has established a Race Equality Charter (REC) Steering Group which has worked to secure the University's first REC Bronze award. During the application, the Race Equality Charter (REC) Steering Group undertook a systematic review to evaluate and understand race equity at the

University. Between 2019-23 the REC Steering Group scrutinised institutional culture and processes, using a variety of methods including surveys, focus groups and data collection and analysis. The Steering Group oversees progress against the institution's REC five-year action plan.

- The institution has also made significant progress with the Athena SWAN gender equality scheme. The University continues to hold an institutional Bronze award, running until November 2026, and has an action plan to enable us to achieve a Silver award. In this REF period, we have achieved two Gold awards for our Schools: The Brighton and Sussex Medical School, awarded in 2024, and the School of Psychology, awarded in November 2025, and every School now holds an Athena Swan award. The award levels across our Schools have improved from two Silver and three Bronze awards at the time of REF2021 to two Gold, one Silver award (Life Sciences) and seven Bronze awards (for Mathematical and Physical Sciences, Engineering and Informatics, Education and Social Work, Global Studies, the Business School and Media, Arts and Humanities, Law, Politics and Sociology) in January 2026.
- There has been progress in the Stonewall Workplace Equality Index: Inclusive Sussex set a target of achieving a top-100 ranking in the Stonewall WEI by 2025. The University's first application to the 2020 WEI resulted in a ranking of 407th, followed by an improved ranking of 264th in the 2022 WEI. In 2023-24, Sussex submitted its third application to the index and was awarded gold status, ranking 30th and placing the University within the top 100 employers, successfully achieving our target. This recognition highlights Sussex's commitment to eliminating inequalities for LGBTQ+ staff and fostering an inclusive culture.
- The University set a target to become a Disability Confident Leader (the highest of three levels in the Government-run scheme which aims to help employers successfully recruit and retain disabled people and those with health conditions). This was achieved in 2024, reflecting our commitments to, and ongoing work to support employing disabled people, leadership activities and reporting on disability, mental health and wellbeing. A revised reasonable adjustments toolkit has been introduced, and a new Disability Leave procedure.
- The Sussex School for Progressive Futures, which has been created as part of the new Sussex 2035 Strategy, is the University's flagship hub to catalyse and coordinate a distinctive, world-changing programme of interdisciplinary education, research, and global and civic engagement bringing together researchers, educators, students, and professional practitioners from across our University, with collaborators from business, industry, government, the arts and the third sector.
- Our pay gaps have reduced across all protected characteristics reported on (gender, ethnicity, disability and an intersectional view of gender and ethnicity), reflecting increased representation of staff and more even distribution throughout the pay levels. There has been an institutional increase of women from 53% to 58% between 2017 and 2024. Academic representation has changed from 44% female to 49% female and there has been an increase of female academic representation in grade 10 from 31% to 37%, and in grade 9 from 38% to 49%. In terms of ethnicity, the overall percentage of racially minoritised staff has increased from 13% to 18%, the percentage unknown has reduced from 10% to 7%, and numbers have increased from 398 in 2017 to 656 in 2024. Amongst academics, the percentage has increased from 18% to 23%, with numbers increasing from 310 to 430. The percentage of racially minoritised academic staff in grade 10 has increased from 6% to 11% and in grade 9 from 22% to 24%. In terms of disability, those declaring a disability has increased from 6% to 14% between 2017 and 2024, with numbers increasing from 171 to 496. Amongst academics, the percentage has increased from 6% to 11%, with numbers increasing from 99 to 193. The percentage of academic staff declaring a disability in grade 10 has increased from 3% to 8%, and in grade 9 from 3% to 10%.

- There have been targeted projects, which include the five-year Black at Sussex project, which aims to improve the experience of Black students and staff at Sussex; the Open Listening Programme, which aims to build a culture of listening and understanding; and a British Council-funded reciprocal mentoring project in partnership with the University of Ghana. The University also signed the Gypsy, Roma, Traveller, Showmen and Boater pledge, signalling the support for staff and students from GTRSB communities.

Part 2: Identifying Staff Contracts with Significant Responsibility for Research (SRR)

All Education & Research contracts at Sussex (ACEMPFUN 3), as submitted in our HESA staff return, represent staff with Significant Responsibility for Research.

Part 3: Determining Research Independence

Our approach to assessing Research Independence for those on research only contracts (ACEMPFUN 2) aims to maximise clarity, inclusivity, and transparency. It also seeks to ensure consistency with how individual roles are defined in contracts of employment and in promotions processes. With this in mind -

- Research-only staff on Grade 9 and above are considered independent for REF purposes;
- Research-only staff on Grades 7 and 8 are considered as having variable independence, and thus subject to a judgement of how far they meet the agreed criteria;
- Research-only staff on Grade 6 and below are considered as not independent.
- Staff undertaking research on Clinical Academic contracts are considered as not independent, unless in individual cases they meet agreed criteria for independence (the same as for Grade 7 and 8 Research-only staff).

This strikes a balance between favouring consistent relationships between employment grade and independence, where possible, and recognising that Grade 7 and 8 Research-only staff work in varying contexts that may or may not involve independence.

Independence is assumed to be persistent, i.e. once an individual is an independent researcher, they should be assumed to remain as such throughout their career. Therefore, if a Grade 7 or 8 colleague has been recognised as independent in one year, they should remain recognised as such in future, without being subject to re-checking against the criteria. In the unlikely event that an individual is recognised as independent but subsequently takes a research-only post at Grade 6 or below, a case-by-case decision on whether to recognise their current independence should be made.

Criteria for determining the independence of Research-only staff on Grades 7 and 8

An independent researcher is one who has responsibility for the design and direction of the research that they undertake in their employed role. This can be demonstrated by the individual meeting one or more of the following indicators:

- Acting as the lead applicant on externally funded research projects, and noting that:
    - If the individual is not officially recorded as 'PI', they may still be treated as such if they are *de facto* the PI;
- Holding one of the competitive research fellowships listed by the REF Team as indicating independence; or holding a different fellowship that the University considers as indicating equivalent independence to a fellowship on the REF Team's list.
- Where research independence is an inherent expectation within their contract.
- Leading a research group or a substantial/specialised work package (however funded).
- For individuals associated with UoAs 13-34, these indicators are also available to demonstrate independence:
    - being named as a co-applicant on an externally funded research grant/award;
    - having significant input into the design, conduct and interpretation of the research.

While there are no minimum thresholds for the financial scale of any grants used as an indicator of independence, the University may at its discretion choose to disregard grants that are of minor scale, in the context of the relevant disciplinary norms, from indicating independence.

Being a named author on published research outputs is *not* a sufficient indicator of research independence.

Decision-Making and Communication:

Regular communications will draw the attention of Research-only colleagues to the relationship between their employment grade and whether or not the contracts they hold contribute to the REF volume measure.

Process for determining the independence of Research-only staff on Grades 7 and 8

- In early June each year, HR will send a dataset (list of Research-only staff, drawn from HR system) to each Faculty Associate Dean for Research & Innovation (ADRI).
- This dataset will have a default mapping to independent/not independent for all grades except Grades 7 and 8, where the most recent indicator is listed.
- The criteria (the set of relevant indicators for independence) and guidance will be provided with the dataset.
- The ADRI, in conjunction with appropriate members of the Faculty (including Heads of Department and UoA leads), will review the Grade 7 and 8 staff against the indicators of independence and reach a fair and evidence-informed view on whether each individual is independent or not. The marked-up list, with brief indications of the reason for the view taken, is to be returned to HR by the end of June.
- In early July, all Research-only colleagues on Grade 7 and 8 will be notified by HR of whether they are considered independent or not and the indications of the reason.
- The letter (or email) will confirm that the view of whether or not the individual is independent is not a judgement of their performance in their role.
- The letter will provide links to further online information about the context, including REF information maintained by RIQI, so that the individual can fully understand this context.
- The letter will state the process for appealing the stated independence status, and the criteria on which an appeal can be made (see below).
- The window for appeals will be open from mid-July to mid-August. The appeals process is set out below.
- HR will confirm the final dataset with the Faculty and with RIQI, and will use the data for the purpose of finalising the REF-related component of HESA staff return.

Staff, Committees, and Training:

Roles and Responsibilities:

The following teams or individuals play a part in the process of determining research independence at Sussex:

- Human Resources: The HR team has responsibility for central administration, including provision of guidance on interpreting 'research independence' within employment contracts and recording the outcome at individual researcher level, for communicating with them about this, and for ensuring that the data is accurately included in the HESA staff return.
- RIQI: The RIQI Team has an advisory role in the process and has responsibility for ensuring that the record of independence in the HESA staff return is accurately reflected in preparation of the REF submission according to the volume measure determined by the HESA staff return.

- The Faculty team: Led by the ADRI, and including Executive Dean, Heads of School, Heads of Department, Unit of Assessment Leads and local managers, as determined to be most appropriate by the ADRI, they assess the research independence of each Research-only member of staff (at Grade 7 and 8), using the criteria laid out above.
- University Research and Innovation Committee: The University Research and Innovation Committee (URIC) has oversight of all matters related to research and innovation policy and strategy, providing assurance to Senate that the University is compliant with external requirements related to research and innovation. It drives the development of a research and innovation environment and culture which maximises the quality and impact of our research and innovation and enables our research community to flourish. The Committee's Terms of Reference and membership appear as part of Appendix 1.
- REF Steering Group: The REF Steering Group reports into URIC. It is the operational co-ordinating body for institutional REF activities. The membership of the REF Steering Group appears at Appendix 1.
- The appeals panel: As set out in 3, below.

Training:

A range of training is in place to ensure the process is undertaken in a fair and equitable way:

- The mandated training relating to Diversity in the Workplace, Unconscious Bias and Recruitment and Selection, as described in Part 1.
- Training co-delivered by the RIQI team and HR to ensure an understanding of the factors which may lead to a determination of research independence, or not, with regard to our HESA return (as detailed in the process above).
- Coverage of REF relevant or associated markers or terms relating to the HESA dataset (including ACEMPFUN, CONFTE, Significant Responsibility for Research (SRR), Research Independence (RI), REFQUALCON, REFUOA2029 and SIGRES) and their impact, or not, on the volume measure.
- Discipline specific training, within Faculties for those involved in the decisionmaking process, which will take place in summer 2026.

Appeals:

The points below outline the process for how staff will be able to appeal decisions about their research independence:

- The window for appeals will be open from mid-July to mid-August.
- Appeals should be sent to the ADRI for the Faculty of which they are a member.
- Where appeals are received, the ADRI (or nominee) will manage the convening of an appeals panel.
- The appeals panel membership will include the following:
    - The PVC R&I or their nominee;
    - One Head of Department, who is based in a different School or Department from the individual, but within the same Faculty;
    - One senior member of academic staff (normally a professor) from a different Faculty;
    - A representative from HR (or nominee).
- The possible grounds for appeal will be set out in the notification letter to individuals. These will specify that an appeal can be made if the researcher believes that they do in fact meet one or more of the specified indicators of independence. Appeals that are unrelated to these grounds will not be considered.
- Appeal outcomes will be communicated by the appeals panel to the individual and to HR.

Equality Impact Assessment (EIA):

EIA Integration:

- An Equalities Impact Assessment (EIA) focused on the population of academic staff who do and do not contribute to the REF volume measure will be undertaken at regular intervals, from the start of 2026. All the EIAs will be made available online for Sussex staff members to view. These 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 EIA, 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.
  The EIA will be designed and delivered by the RIQI Team with input from the Equality, Diversity and Inclusion unit (based within Human Resources). It will be regularly reported to the University Research and Innovation Committee (URIC) and to the University Executive Board (UEB), and (in summary form) to Senate.
- 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 Education & Research and Education & Scholarship, 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 Executive Deans (or their representatives) in receipt of the analysis to inform the development of medium- and longer-term internal policy and guidance on ensuring that the academic environment is inclusive and supportive for both Education & Research and Education & Scholarship staff, and features active attempts to enhance equalities and diversity.
  If the EIA indicates material underrepresentation of a particular demographic group, the Pro-Vice-Chancellor Research & Innovation, on behalf of UEB, along with the Executive Director of Human Resources (or nominee) and the Head of Research Information, Quality & Impact, will review the process used to identify staff as holding Education & Research contracts and therefore as having significant responsibility for research, in order to ensure that it is accurate and robust.
- The EIA will apply the REF2029 core EIA questions as part of the EIA for this component of the process to ensure the University has given due regard to the Public Sector Equality Duty (PSED).
- The final EIA will be published online after the submission has been made.

Part 4: Allocating Contracts to UoAs

Policies and Procedures:

The process outlined below illustrates the approach taken to aligning staff contracts to a REF2029 Unit of Assessment (UoA):

- A contract is aligned to a Unit of Assessment based on the staff member's Departmental alignment in the University's organisational hierarchy. This is based on the similar approach the University has taken when mapping staff to HESA cost centres for our annual staff data return.
- Where staff members have contracts in more than one Department, this will be split across Units of Assessment by the pro rata FTE they are contracted to each Department. Again, this is the same approach the University has taken when mapping staff to HESA cost centres.
- Where staff members hold both a qualifying and non-qualifying contract for REF2029, only the qualifying element will be assigned to the appropriate UoA for the purposes of contributing to the volume measure.
- Where the nature of the research relating to a contract held by a member of staff is more appropriately aligned outside of the default UoA to Department mapping, the decision on such alignment within a Faculty rests with the Executive Dean and Associate Dean for Research & Innovation in that Faculty, usually in discussion with the relevant UoA leads.
- Where the decision to record a contract belonging to a staff member outside of the departmental mapping involves more than one Faculty, the decision making and ratification processes pass to the PVC R&I whose decision is final.

Staff, Committees and Training:

The following teams or individuals play a part in the process of aligning academic staff contracts at Sussex:

- The central HR team has the responsibility for the recording, update and maintenance of staff records including the Department/s to which they are aligned. The REFUOA2029 flag is also maintained via the central HR database.
- Faculty leads (ADRIs, UoA leads) review their pool of staff contracts to determine where re-aligning an individual's contract from the default Departmental mapping to an alternative UoA is appropriate, based on the nature and the coverage of their research subject matter.
- The RIQI team has an advisory role in supporting Faculty leads (ADRIs, UoA leads) who re-map staff contracts to an appropriate UoA, outside of the default Departmental mapping.
- The rationale for and validation of changes is discussed at Faculty Research & Innovation Committees and, where required, discussed with, and ratified by, the PVC R&I.

Training will be offered and co-delivered by staff in the RIQI and HR teams on an ongoing basis to staff involved the decision making, particularly around key milestones (including, but not limited to, internal review sessions and prior to the HESA data collection exercise). Training will include coverage on:

- As part of the training outlined in part 3, coverage of REF relevant or associated markers or terms relating to the HESA dataset (including ACEMPFUN, CONFTE, Significant Responsibility for Research (SRR), Research Independence (RI), REFQUALCON, REFUOA2029 and SIGRES).
- The alignment, or not, between University Departments, HESA cost centres and REF Units of Assessment.

Equality Impact Assessment (EIA):

- An Equalities Impact Assessment (EIA) on the population of all academic staff, reviewing both their Departmental and Unit of Assessment alignments will be undertaken annually, prior to the point of submitting our HESA staff return, to ensure staff contracts are allocated across the range of Units of Assessment in a transparent and equitable way. This EIA will consider all of the protected characteristics for which the University holds robust data. The EIA will be designed and delivered by the RIQI Team supported by the Equality, Diversity and Inclusion unit (based within Human Resources).
- It will be regularly reported to the University Research & Innovation Committee (URIC) and to the University Executive Board (UEB), and (in summary form) to Senate.
- These results will be used by UEB and Faculty leaders in receipt of the analysis to inform the development of medium- and longer-term internal policy on ensuring that the academic environment is inclusive and supportive for all staff and features active attempts to enhance equalities and diversity across all relevant subject areas.
- The EIA will apply the REF2029 core EIA questions as part of the EIA for this component of the process to ensure the University has given due regard to the Public Sector Equality Duty (PSED).

Part 5: Selecting outputs

Policies and Procedures:

- Our aim will be to maximise outcomes whilst also taking into consideration the spread of outputs across authors and subject areas in the Unit, where outputs are of comparable quality.
- As there is no minimum number of outputs and the maximum number which can be submitted per person has been capped at five, we anticipate that some staff who are on eligible contracts will not have any outputs included in the submission.
- Whether an individual's contracted FTE is included in the volume measure calculation will have no bearing on whether or not their outputs are selected for submission nor to which Unit the output is assigned.
- While the Vice-Chancellor retains the power to make all final decisions on the content of the REF submission, decisions on the selection of outputs will normally be delegated to the academic UoA Lead, and to the PVC R&I and Faculty-level Associate Deans for Research & Innovation (ADRIs) where the interests of multiple UoAs are involved.

Selecting outputs for submission

- In line with the flexibility introduced in the REF2029 guidance, we will consider outputs for submission in any UoA where the University intends to make a submission and where the outputs in question are a clear and demonstrable fit with the remit of the relevant UoA. This means that they may be considered and assessed for submission both in the individual's employing department (which may be the UoA with which they have been associated in the HESA staff returns) and in other units.
- Outputs selected will reflect the principle of decoupling outputs from individuals but still demonstrate the required substantive link, as laid out in the REF guidance, which establishes the relationship between the HEI and the research, within the scope of the REF2029 Open Access policy. This will be managed through the University's Research Information System, Elements, which links outputs produced by Sussex staff to REF-eligible contracts to identify and demonstrate the requisite substantive link. Reporting via Elements and through a linked dashboard gives strategic oversight of this information to UoA Leads and ADRIs when selections are made and audit functionality for the RIQI and Library Research Support Teams to assess compliance.
- The University's central RIQI and Library Research Support Teams will support academic UoA Leads to have access to information on all outputs where there is a likely fit with the remit of the UoA, to the best of their ability within any technical constraints that may apply.
- Where more than two UoA Leads wish to submit the same output in their UoA, the matter will be flagged for review and decision:
    - If the three or more UoA Leads are all based within the same Faculty, to the ADRI and Executive Dean.
    - If the three or more UoA Leads are based within more than one Faculty, to the PVC R&I.
- The relevant Faculty ADRI or the PVC R&I will then decide on which UoAs should submit the output in question. They will consider representations from the UoA Leads involved and may seek advice from internal or external experts in the subject area.
- The relevant Faculty ADRI or PVC R&I's decision will be final (except in the unlikely event that they are overruled by the Vice-Chancellor).

Assessing outputs for potential submission

- UoA Leads will determine which outputs should reasonably be taken as in scope for assessment for potential REF submission in each UoA.
- UoA Leads are expected to ensure that selections are informed by a robust assessment and deliberation process, making use of internal colleagues as reviewers and use of External Research Advisors (ERAs) is strongly encouraged.
- UoA Leads should ensure additional information is sourced from authors where outputs in languages other than English, including British Sign Language, are selected for review, if this is asked for by reviewers. Outputs in other languages will not be treated any less favourably and where possible they should be reviewed in their original format.
- UoA Leads should be mindful that the outputs selected for submission are reflective of the research strategies which have been adopted within their discipline and their pool of outputs reflect the breadth of the research within that subject area.

The rights of individual colleagues in relation to output assessment and selection

Where an individual's outputs are being assessed for potential submission in the UoA that represents their employing unit, the UoA Lead should take the following steps:

- Any reviews of an individual's authored outputs must be disclosed to the individual if they request it.
- An individual can request additional review of an output if this is practically possible within the time and resources available; the UoA Lead will normally facilitate this once only.
- Individuals will have the opportunity to declare if they have a conflict of interest with any reviewers involved in the process. UoA Leads must arrange alternative reviewers where a conflict of interest has been declared.
- The UoA Lead may seek additional contextual information from the author about the output, though they are not obliged to do so.
- Where an individual's outputs are being assessed for potential submission in a UoA that is *not* their employing unit, the UoA Lead should take the following steps:
    - If the output has reached a stage of assessment where it is considered likely to be selected, the UoA Lead should notify the individual author(s) concerned by email. (The UoA Lead does not need to do this where an output is being taken through an initial review and it is not yet clear whether it is likely to be selected or not.) The UoA Lead may seek additional contextual information from the author about the output, though they are not obliged to do so.
    - Any reviews of an individual's authored outputs must be disclosed to the individual if they request it.
    - An individual can request additional review of an output if this is practically possible within the time and resources available; the UoA Lead will normally facilitate this once only.
    - Individuals will have the opportunity to declare if they have a conflict of interest with any reviewers involved in the process. UoA Leads must arrange alternative reviewers where a conflict of interest has been declared.
    - ~~o~~ Individuals do not have any right of appeal with regards to the submission.

Outputs from staff who have left the University.

- All eligible outputs will be fully considered for submission on their merits, including any outputs from staff who have left during the REF period, to the full extent that this is permitted by the REF2029 Guidance.

- This includes staff who have left to take up new employment, to take a career break, to retire, who have left through a Voluntary Leavers scheme, or for any other reason except compulsory redundancy.
    - The REF2029 guidance relating to Contribution to Knowledge & Understanding (Section 4), states at point 6.7.2 "Outputs where the substantive link occurred before the submitted output was made publicly available, will not be eligible for submission where the author was subject to compulsory redundancy." (At the time of preparing this document, no compulsory redundancies have been made during this REF period).

Supporting diversity of outputs

The University is committed to ensuring full consideration is given to the inclusion of a diverse range of output types within its submission, in recognition that diverse research practices and methods can lead to a wide variety of new or alternative output types. Our institutional research information system, Elements, has functionality to record all output types and the review and potential selection of diverse output types will be actively promoted in Faculties. ADRIs and UoA Leads will be provided with reports on the proportion of output formats within their UoAs to monitor diversity of output types and to assess whether the spread is a fair and accurate representation within their discipline.

Diverse outputs are prevalent in subject areas such as Music and Creative and Critical Practice within the Faculty of Media, Arts and Humanities (MAH). These include a range of non-textual and Creative Practice as Research (CPR) outputs, such as exhibitions, performances, films, compositions, devices & products, digital & visual media, datasets and designs, and several multi-component outputs. Guidance and templates have been developed by the Faculty in partnership with the Library, to assist researchers with capturing and contextualising their practice. Professional Services staff work with individual researchers to populate a branding-approved template created using University-licenced software (an interactive content creation platform), to present documented materials in a professional and accessible format. Equivalent and equitable review of all types of output will take place across all of our Units of Assessment.

Ensuring that the submission is representative

- UoA Leads, alongside their Faculty ADRIs, have responsibility for ensuring that the profile of selected outputs is representative of the range of research activity in their unit. They are required to give serious regard to this and participate in any scrutiny on whether the planned submission is sufficiently representative.
- The REF Steering Group, supported by the RIQI team, will give general advice and guidance to UoA Leads on balancing the need to maximise the quality of the submission with the need for it to represent the range of research activity in the unit and will convene internal discussions to explore this further as needed.
- Representativeness will be considered in relation to issues including, but not limited to:
    - The relationship between the outputs profile and the relevant research strategy (at Faculty, School, department and/or unit level).
    - The range of subject areas and fields in which members of the unit are active.
    - The research centres and groups that exist within, or encompass, the unit.
    - The networks, programmes, and major projects held within the unit or to which it contributes.
    - The range of output types and research practices within the unit.

- EDI analysis of the authors of provisionally selected outputs versus the overall EDI profile of the unit will be undertaken before final selections are made. Outputs from significantly under-represented groups will be given additional consideration if this exercise suggests that is required.

Policies and procedures and responsible research assessment practice
The University of Sussex is a signatory to the San Francisco Declaration on Research Assessment (DORA) and commits to two key principles for assessing and evaluating research quality. Of these, the first principle has direct relevance to REF2029 and this Code of Practice:

Principle 1: Research outputs and other research contributions will be evaluated on their intrinsic merit, rather than relying on inappropriate proxies and metrics such as the title or impact factor of the journal in which the research was published.

The University's approach to the selection of materials for REF2029 will have full regard to its commitment to DORA and its principles. The full statement can be found at appendix 6.

Staff, Committees and Training: as appears at part 3.

Equality Impact Assessment (EIA):

- An Equalities Impact Assessment (EIA) will be carried out in support of our annual REF review sessions , at UoA level, to ensure the overall selection is representative of the broad research endeavour at the University of Sussex and is being made in a transparent and equitable way. This EIA will consider disciplinary and demographic data held by the University. The EIA will be designed and delivered by the RIQI Team with support from the Equality, Diversity and Inclusion unit (based within Human Resources). It will be regularly reported to the University Research and Innovation Committee (URIC) and to the University Executive Board (UEB), and (in summary form) to Senate.
- An EDI-focused REF-specific dashboard is being developed to provide visibility across all UoAs and at institutional level. This will include data relating to grade, part-time or full-time/fixed term or permanent contracts, gender, age, disability and ethnicity which will be available to the strategic REF and Faculty leadership.
- These results will be used by UEB and Faculty leaders in receipt of the analysis to inform the development of medium- and longer-term internal policy on ensuring that the academic environment is inclusive and supportive for all staff and features active attempts to enhance equalities and diversity across all relevant subject areas.

Part 6: Appendices

Appendix 1: Role Descriptions for Key Individuals and Teams:

The Vice-Chancellor and President

The Vice-Chancellor and President is the University's chief academic and executive officer. She is also a member of the University's governing body, the Council, and is Chair of the Senate and of the University Executive Board. The current Vice-Chancellor and President is Professor Sasha Roseneil.

The Deputy Vice-Chancellor and Provost

The DVC and Provost is the deputy to the Vice-Chancellor and President, and a member of the University Executive Board (UEB). The DVC and Provost acts as the line manager for the Executive Deans in each Faculty. The current DVC and Provost is Professor Michael Luck.

The Pro-Vice-Chancellor (Research & Innovation)

The Pro-Vice-Chancellor (Research & Innovation) has responsibility for the full portfolio of research and innovation activities at the University, including REF. The Pro-Vice-Chancellor (Research & Innovation) is Professor Maria Fasli.

The Pro-Vice-Chancellor (Culture, Equality and Inclusion)

The Pro-Vice-Chancellor (Culture, Equality and Inclusion) has strategic responsibility for all aspects of culture, equality, diversity and inclusion at Sussex. The PVC CE&I is also the University's Freedom of Speech Officer with executive oversight for securing and promoting freedom of speech. The Pro-Vice-Chancellor (Culture, Equality and Inclusion) is Professor David Ruebain.

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 Mr Jim Andrews.

The Executive Director of Human Resources

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

The Director of Research & Innovation Services

The Director of Research & Innovation leads the Research & Innovation 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 Head of Research Information, Quality & Impact in ensuring REF preparations are co-ordinated and robustly delivered across these teams. The current Director of Research and Innovation is Dr Claire Potter.

The Director of Library Culture and Heritage and University Librarian

The lead officer for the University's library service, including acting as strategic lead on advocating for open research practice and delivering learning spaces across the University. The current Director of Library Culture and Heritage and University Librarian is Ms Jane Harvell.

The Head of Research Information, Quality and Impact

The Head of Research Information, Quality and Impact 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 Pro-Vice-Chancellor (Research & Innovation), and operational and technical planning, working closely with the Director of Research & Innovation Services as well as Professional Services colleagues across the University. The Head of Research Information, Quality and Impact also manages, and directly contributes to, editorial preparation of the narrative sections of the submission, including impact case studies and SPRE 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 Head of Research Information, Quality and Impact is Mr Mark Chee.

The Research Information, Quality and Impact Team

The Research Information, Quality and Impact Team includes the REF co-ordination and editorial support functions within Research & Innovation Services. It includes three full-time staff members working directly on REF preparations alongside four full-time staff members who manage and provide the necessary data and reporting at relevant times.

Key Individuals and Bodies – Faculty and Unit Remit:

Executive Dean (one per academic Faculty)

The Executive Dean for each Faculty provides academic leadership and management of the Faculty, in support of the University's vision, mission and strategic aims.

Associate Dean for Research & Innovation (one per academic Faculty)

The Associate Dean for Research & Innovation (ADRI) provides research leadership, management, and support in their Faculty, under the direction of the Faculty Executive Dean. This includes oversight of the REF Unit of Assessment leads based within their Faculty and in the assessment processes used there, including the selection and use of external assessors (known as External Research Advisors or 'ERAs'). The ADRI supports the Executive Dean 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) Lead

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 SPRE templates and co-ordinating the preparation of impact case studies, and ensuring these processes are robust, fair, and transparent. They work alongside, and are supported by, academic staff with specific focuses on individual REF components (such as impact leads) as well as Professional Services research support staff.

University Research and Innovation Committee Terms of Reference

Committee purpose

The University Research and Innovation Committee has oversight of all matters related to research, and innovation policy and strategy and provides assurance to Senate that the University is compliant with external requirements related to research and innovation. It drives the development of a research and innovation environment and culture which maximises the quality and impact of our research and innovation and enables

our research community to flourish. All academic committees operate in accordance with the University's governing documents – Charter, Statutes and Regulations – and the Public Interest Governance Principles.

Membership

- Pro-Vice-Chancellor for Research and Innovation (Chair)
- Deputy Pro-Vice-Chancellor for Knowledge Exchange
- Associate Deans for Research and Innovation from each Faculty
- One academic elected member of Senate
- Director of Research and Innovation Services
- Chair of the Postgraduate Researcher Sub-Committee
- Chair of the Early Career Researcher Sub-Committee
- Chair of the Research Governance and Quality Assurance Sub-Committee
- Chair of the Research Ethics and Integrity Sub-Committee

In attendance:

- University Librarian (or nominee)
- Chief Digital and Technology Officer (or nominee)
- Secretary to the Committee

Terms of Reference

a) To advise Senate on all matters relating to the research and innovation strategy of the University;

b) To be responsible for the development and implementation of the University's Research and Innovation strategy and to review progress made against its aims, objectives and operational plan;

c) To support Faculties in the development of research and innovation strategies through promotion and exchange of best practice, to ensure their alignment with institutional strategies, and to monitor progress against strategic objectives through receipt of annual progress reports;

d) To identify and draw to the attention of the appropriate University body the resources necessary to support the University Research and Innovation Strategy, and to advise the Pro-Vice-Chancellor for Research and Innovation on areas where improvements could be made and where new opportunities may be pursued;

e) To be responsible for monitoring institutional progress against the Research Excellence Framework (REF) and Knowledge Exchange Framework (KEF) strategies through receipt of periodic reports;

f) To monitor the national and international research and knowledge exchange policy and funding environment in order to influence the development of research and knowledge exchange policy and strategy of key funders, to position the University to respond to opportunities, to advise Senate on the implications of any developments, and to ensure that effective responses to external research and innovation related reviews and consultations are 2 made on behalf of the University;

g) To promote and exchange best practice in order to enhance the research and innovation environment and culture of the University and support the development of capabilities that enable the research community to flourish;

h) To undertake regular reviews of institutional research drivers, considering performance against relevant benchmarking data, and to recommend any updates to Senate Key Performance Indicators and future success indicators for Sussex 2035;

i) To monitor, approve and keep under review relevant University research and innovation policies and procedures, and where necessary, make recommendations to Senate;

j) To provide advice and guidance to Research and Innovation sub-committees, and through the receipt of periodic reports, ensure progress against strategic objectives, compliance with external obligations and promotion of best practice in relation to sector developments where the University is signatory:

- to review the annual statement of compliance with the Concordat to Support Research Integrity and to ensure the University upholds the highest standards of rigour and integrity in all aspects of research through the Research Ethics and Integrity Sub-Committee (REISC).
- to ensure that University research is conducted to appropriate ethical and legal frameworks through the Research Governance and Quality Assurance Sub-Committee (RGQASC).
- to monitor and review the University's regulations, policies and procedures for postgraduate research, and the quality of research degree programmes through the Postgraduate Researcher Sub-Committee (PGRSC)
- to monitor and review the University's commitment to the Researcher Development Concordat through the Early Career Researcher Sub-Committee (ECRSC).

k) To provide direction to the following research and knowledge exchange related groups and receive periodic reports from them in order to monitor progress against strategic objectives:

- Research Excellence Framework (REF) Steering Group
- Knowledge Exchange Steering Group
- Funder Engagement Coordinating Group
- Research Culture Steering Group
- Research IT Committee
- Open Research Group.

l) To approve the establishment, amendment or closure of Centres of Excellence and to be responsible for undertaking mid-term reviews and the renewal process;

m) To receive periodic updates on significant outcomes from Faculty reviews of Research Centres and Groups, and Centres of Excellence;

n) To support the University's ambition to ensure research and innovation practice is undertaken sustainably;

o) To actively consider Equality, Diversity and Inclusion in all decisions made.

Quoracy

One third of total membership shall constitute a quorum.

Frequency

The Committee meets a maximum of 10 times per year. Reports to Senate (reports will also be sent to Council when appropriate).

September 2025

Appendix 2: Brighton & Sussex Medical School

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 REF2029 Code of Practice applies to them in full and on an equal basis with any other Sussex employee. For avoidance of doubt, the REF2029 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 3: Default Sussex Department to REF UOA Mappings

To be added when the Units of Assessment to which Sussex will submit are finalised.

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

The University will ensure that all personal data used for REF purposes are 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 REF2029 preparations will be destroyed in June 2030, 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 any extension.

The purpose of the Research Excellence Framework 2029 (REF2029) 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.

Further information on the data being collected is available on the REF website, at www.ref.ac.uk

Sharing information about you

Research England 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)
- Commission for Tertiary Education and Research (Medr)
- 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).

Research England and the organisations listed above will use the information to analyse and monitor the REF2029. 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.

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

Some personal data will be passed to the REF expert panels and the Equality and Diversity Advisory Panel (whose members are independent of Research England) 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 Research England, on behalf of the four UK higher education funding bodies, in December 2029. 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 RIQI Team will undertake a thorough check of all documents submitted to REF2029 to ensure that they comply with this policy. Any personal details that should not be included found at this time will be redacted.

It is anticipated Research England will also publish a list of the outputs submitted by the University in each UOA. This list may include standard bibliographic data (including the 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

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 applicable data protection legislation.

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, you can contact the Data Protection Officer at dpo@sussex.ac.uk.

The basis for processing your personal data

Under the University's Royal Charter, the University's purpose is '*to advance learning and knowledge by teaching and research to the benefit of the wider community*'.

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 ('public task')**, in connection with our teaching and research activities.

We also process personal data to provide administrative and support services to our students and staff; to support alumni relations and fundraising; to promote the University and recruit students; to maintain our records, accounts, and commercial activities; and to manage the overall running of the University and maintenance of its campus, including monitoring and evaluating its performance and effectiveness.

Additionally, we process personal data because it is necessary for **the performance of a contract**, or in order to take steps at an individual's request prior to entering a contract. For example, this may include interacting with individuals before they are enrolled as a student, as part of the admissions process, or the recruitment and hiring of staff.

We may also need to process personal data to comply with our **legal obligations**. This can include compliance and regulatory obligations, immigration obligations and safeguarding requirements, or to assist with investigations carried out by the police or other authorities. We may also process personal data for the purpose of, or in connection with, legal proceedings (including prospective legal proceedings), for the purpose of obtaining legal advice, or when necessary for the purposes of establishing, exercising or defending legal rights.

In some cases, we process personal data because it is necessary for our or a third party's **legitimate interests**, or in circumstances where we have specific **consent** to do so. Finally, in limited circumstances, we may also process personal data where it is necessary to protect a person's **vital interests** namely matters of life or death.

Special category data

Personal data may include *'special categories of data'* as described in data protection legislation, such as information about an individual's racial or ethnic origin, religious beliefs, sexual orientation, and physical or mental health.

When we process special category data, we must meet additional conditions in the data protection legislation. Usually, this means having the person's explicit consent but other examples of situations where we process special category data include:

- To meet our employment obligations, such as health and safety requirements;
- For health or social care purposes such as occupational health;
- For reasons of substantial public interest such as ensuring equality of opportunity or treatment, or protecting the public against dishonesty;
- For research purposes, where such research is in the public interest; and
- To manage legal claims and proceedings.

Information about how and why the University processes special category data, as well as criminal convictions data, and how we safeguard this data can be found on our Data Protection pages and in our Appropriate Policy Document.

Further information about the processing of this type of personal data is published on the ICO's website.

Personal data we collect about you and how we use it

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

Website visitors and enquiries

We collect personal data from visitors to the University's website through the use of online forms as well as when you email us with an enquiry. We collect information about the transactions you undertake through the website 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 personal data collected through this website or other electronic networks used by the University, for the purposes of advertising, marketing, public relations and general advice services, such as:

- 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).

Prospective applicants, applicants, students and alumni

We collect personal data from individuals who are enquiring about the admissions process and/or considering submitting an application to study at the University. We collect personal data via student applications through the UCAS system and our own application systems. Should you subsequently enrol as a student at the University, a student record will be created for you.

The data collected from prospective students, students, and/or alumni of the University is used for the following purposes:

Accounts and records

- the administration of student accounts and payments;
- the collection of student fees;
- to maintain a central student record;
- to enable us to fulfil statutory reporting obligations.

Education

- administration relating to the application process, e.g. receipt and processing of application forms, liaison with UCAS and agents, assessment of grades and applications in order to determine offers of admission, and to produce statistics relating to admissions;
- administration related to student visas and UKVI obligations;
- to deal with student awards and scholarships;
- administration required for provision of education and training (such as registration and timetabling);
- provision of education and training such as the planning and control of curricula and exams, and commissioning, validating and producing educational materials;
- to contact individuals where we hold disability details to signpost to our Disability Advice service to register for arrangement of reasonable adjustments;
- video capture of lectures, seminars and other teaching activities, and to support the online delivery of teaching;
- attendance and engagement monitoring;
- to consider exceptional circumstances claims and implement reasonable adjustments;
- calculation and publication of assessment and exam results;
- to administer the academic appeals process;
- to carry out student discipline, student complaints and academic misconduct processes;
- administration relating to visiting and exchange students and the Study Abroad programme;
- provision of references and transcripts.

Student Experiential Services

- to allocate housing and to provide campus and residential support for students living in University-managed accommodation;
- administration of grants and loans, e.g. student loans and access loans;
- administration and provision of library services including membership records, loan/hire records, information and databank administration;
- ticket issue/reservation services and the running of events;
- administration and provision of a student card;
- administration and provision of pastoral, welfare and support services*;
- administration and provision of careers guidance and employability activities;
- activities undertaken as part of our commitment to widening participation and access;
- administration and provision of computing and IT facilities;
- administration and provision of Student Union services;
- to request testimonials from current students for the purpose of assisting prospective students through the application and Clearing processes.

** The provision of welfare and support services may sometimes involve special category data and where necessary, your consent will be sought and we will provide additional information.*

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;
- 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 personal data 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 our Alumni team
- use Study/Sussex Direct to update your preferences if you are a current student
- email alumni@sussex.ac.uk.

Employment applicants 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. The way your data is used is outlined below:

Employment applications

- selection processes, including short-listing candidates and interviews;
- equality and diversity monitoring;
- processing expenses related to interview processes;
- pre-employment health screening.

Staff members

- payroll administration and HMRC compliance;
- administration of employee pension schemes;
- provision of occupational health services, including for pension purposes;
- management of absence records;
- verification of eligibility/right to work;
- administration of flexible working arrangements and remote working;
- providing access to secured buildings and to parking facilities;
- for monitoring purposes and ensuring compliance with equality and diversity requirements;

- reviewing performance and facilitating promotion and reward;
- to carry out staff grievance and disciplinary processes;
- processing expenses and administrating corporate spending accounts;
- administration and provision of computing and IT facilities;
- to enable us to fulfil statutory reporting obligations.

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

Research

Research is part of the University's public task and our research activities will often involve the processing of personal data, including special category data. Further information can be found below and within our Research policies.

A range of personal data is collected through our research activities. This may include details about a person such as their name, family information and work details, a person's thoughts or feelings, or their views or opinions on specific research areas. Data is collected in a variety of ways, such as through questionnaires, interviews and focus groups, and from individuals themselves or others.

We may collect data from third parties or by extracting data from websites (known as data scraping). Third parties may include commercial or private organisations, or public and government bodies such as the NHS, HMRC or the Department for Education. For instance, we may request personal data from the Department for Education relating to pupil, learner and workforce datasets such as the National Pupil Database and the School Workforce Census. This can include data such as name and address, school details, learner records, special educational needs of pupils, salary information of teaching staff and special category data such as ethnicity and disability.

We only collect personal data that is needed for the research purposes and only keep the information in a way that enables individuals to be identified, for as long as is necessary.

Research participants

Where our research involves human participants, the research is subject to an ethical review process. This ensures that all ethical matters have been considered and the processing of personal data is appropriate. Research participants are provided with an information sheet relating to the specific piece of research they are participating in, which includes information on the collection, use, and retention of their personal data.

Special category data in research and health research

Our research may include special category data such as ethnicity, political or religious views, genetic data and health data. The use of special category data in our research activities is on the basis that '*processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes*' (Article 9(2)(j) of the UK GDPR).

As a University we use personal data to conduct research to improve health, care and services, and we ensure that it is in the public interest when we use personal data from people who have agreed to take part in research. This means that when you agree to take part in a research study, we will use your data in the ways needed to conduct and analyse the research study. Some of your rights, such as deletion of your data from the research project, may be limited, as we need to manage your data in specific ways in order for the research to be reliable and accurate. If you withdraw from the study, we will keep the information about you that we have already obtained. To safeguard your rights, we will use the minimum amount of personal data possible.

Health and care research should serve the public interest, which means that we have to demonstrate that our research serves the interests of society as a whole. We do this by following the UK Policy Framework for Health and Social Care Research.

Photography, video and video conferencing

We capture images and videos on campus for our communications and for promotional use on the University's website, social media channels, and/or print materials, some of which may include individuals. In cases where individuals are clearly identifiable, consent will be obtained.

The University also records video footage of some events, such as our graduation ceremonies, for the purpose of making these available via its website to those who are unable to attend. Notices will be posted at events and information made available for those who prefer not appear in any footage.

To enable video conferences and meetings to take place, the University recommends the use of a number of approved technology solutions (e.g. Microsoft Teams and Zoom), which have recording capabilities. Where recording of meetings or conferences is required, personal data is processed with the consent of those involved where necessary.

CCTV, Body Worn Video devices, and Automated Number Plate Recognition ('ANPR')

The University processes personal data through the use of surveillance systems, such as CCTV, Body Worn Video devices and ANPR, to monitor and collect visual and audio recordings to provide a safe environment for students, staff and visitors to the campus and for the purposes of security along with parking.

Such personal data may be used for the prevention and detection of crime; for evidential purposes to support criminal, civil and other proceedings, including disciplinary investigations against staff and students; for assisting in traffic management and parking enforcement; and to assist in Health and Safety requirements and other legal or regulatory compliance obligations.

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, unless required by law or other exemptions to keep it for longer.

Personal data is processed and stored in line with the University's Records Management Policy and the associated 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 there is a lawful basis for doing so – such as having your specific consent - or where it is necessary and appropriate safeguards are in place. For instance, we may disclose personal data to:

- companies or suppliers who we work with;
- relevant government departments and agencies such as the Office for Students, UKVI/the Home Office (in connection with visas and immigration), HMRC, and local authorities (for council tax and electoral registration purposes) or police (e.g. for the purposes of prevention and detection of crime and/or prosecution and apprehension of offenders);
- funding bodies such as Student Loans Company or sponsors;
- professional and regulatory bodies in relation to confirmation of qualifications, professional conduct and the accreditation of courses;
- legal representatives;
- internal and external auditors;
- the University's insurers (e.g. when dealing with personal claims).

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 can be found in the relevant HESA notices.

We will also share personal data with the Higher Education Access Tracker (HEAT). HEAT is a nationwide database used by universities, which helps us to monitor and evaluate the effectiveness of our Access and Participation Plan. Details of how HEAT processes your personal data and for what purposes, and your rights in relation to your personal data can be found in the relevant HEAT notices.

From time to time, the University will transfer personal data outside the United Kingdom. Personal data will only be sent to countries that have equivalent data protection safeguards or where we have arrangements in place to ensure the appropriate safeguarding of data.

Your rights including access to information and correction

You have a number of rights under data protection legislation:

- **Information** - where personal data is collected from you, you have the right to be various information about the collection and use of your personal data. This includes details about the purpose(s) for processing and retention periods for that personal data, and who it will be shared with;
- **Information** - where your data is not obtained from you, you have the same right to the information above, as well as details about what personal data is collected and by who;

- **Access** - you have the right to confirmation of whether or not we are processing your personal data and to obtain a copy of your data. This is known as a subject access request;
- **Rectification** - you have the right to rectify any inaccuracies in personal data concerning you;
- **Erasure** - you have the right to be forgotten in some circumstances, i.e. to have your data erased;
- **Restriction** - you have the right to restrict the processing of your personal data in certain ways;
- Where there is a request to rectify, erase or restrict the processing of data, we will let any recipients of that data know, where possible. You have the right to know who those recipients are;
- **Data portability** - you have the right to receive your personal data in a structured, commonly used and machine-readable format, and to transfer your data to another controller;
- **Objection** – you have the right to object to certain processing of your personal data by us, such as direct marketing;
- **Decision making** – you have the right not to be subject to a decision based solely on automated processing, including profiling; and
- **Withdrawal of consent** - Where your consent is the legal basis for our processing, you have the right to withdraw your consent.

Not all the rights apply in all circumstances. For more information, refer to our Data Protection pages for guidance, including on how to submit a subject access request, or contact the Data Protection Officer. Further information about your rights can also be found on the ICO's website.

You have a right to complain to the ICO about the way your personal data is processed if you have concerns. Information on how to report concerns to the ICO is provided on their website.

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 knowcookies.com and to find out more about how the University uses cookies, please refer to 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 1 July 2025.

How to contact us

If you have any questions about our privacy notice or the personal data 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 Dignity, Respect & Inclusion Policy of the University of Sussex
DIGNITY, RESPECT & INCLUSION POLICY

1. OVERVIEW AND PURPOSE

1.1 The purpose of this policy is to articulate and confirm the University's commitments and approach to supporting dignity, respect, equality, diversity and inclusion for everyone in the University community, to make individuals aware of their responsibilities in relation to the policy, to define key terms, and to signpost to relevant procedures and associated documents flowing from the policy (see Annex A for more details).

1.2 The University is committed to promoting equality and to creating an inclusive working, learning and living environment where all members of our diverse community can know that they belong and are treated fairly and with respect and dignity, in order to enable everyone to achieve their full potential.

1.3 Part of this includes compliance with the Equality Act (2010) and other relevant legislation which helps by providing a legal framework to protect people from discrimination, harassment and victimisation in their place of work or study.

1.4 As a Higher Education Institution, the University has specific equality duties that also require it to have due regard to the need to:

- Eliminate discrimination, harassment and victimisation; and
- Advance equality of opportunity, and to foster good relations, between persons who share a relevant 'protected characteristic' and persons who do not share it.

1.5 The University's core values are collaboration, courage, inclusion, integrity, kindness and openness, and we seek to embody these in all we do so that all members of our community can make a contribution and thrive.

1.6 The University will foster a positive culture for working, learning and living which supports freedom of thought and freedom of expression within the law, and within the legal framework of respect for the rights of other people. This is compatible with the University's obligation to take the steps that are reasonably practicable to take so that freedom of speech within the law is secured for our staff, students, members and visiting speakers (see further detail in section 4).

2. SCOPE

2.1 This policy applies all members of the University Community (see 3.2) including staff and students and relates to both individual and collective activities and dealings with others. It also extends to those who provide services to us, and to visitors to our campus.

3. RESPONSIBILITIES

3.1 University Council

3.1.1 The University Council has ultimate accountability for compliance with the University's equality obligations and for the approval of this Policy.

3.2 All members of the University Community

3.2.1 All members of the University community have a responsibility to:

- read this policy and adhere to it and all associated procedures and policies flowing from it, as outlined in this document (as relevant to their roles); and
- complete all mandatory in-person and online training associated with this policy and associated procedures and policies, as required.

3.3 Managers, Academics and Advisors

3.3.1 Managers, academics and advisors who are professionally involved in staff and student support, development and supervision have specific responsibilities for the implementation of this policy to:

- take the lead in promoting a culture of dignity, respect, inclusion, free speech and academic freedom;
- implement all relevant policies and practice to support fair treatment in work and study; and take timely, relevant action to resolve concerns using the appropriate procedure.

3.4 Governance

3.4.1 The University Executive People and Culture Board (or such relevant Executive governance committee as is established) is responsible for monitoring implementation of this policy, including monitoring and reviewing its performance, and the effectiveness of this policy and associated procedures. An annual assurance report will be provided for Council/Strategy and Performance Committee (or such relevant Council governance committee as is established) and other relevant committees.

4. POLICY

4.1 General Principles

4.1.1 The University seeks to ensure that all those to whom the policy applies (as set out in paragraph 2.1):

- are valued for their skills, abilities and contributions;
- are treated with dignity and respect;
- are able to study, work and live on campus free from bullying, harassment, victimisation or violence;
- experience no form of unlawful discrimination;
- are able to impart ideas, opinions and information freely subject only to limitations provided by the law.

4.1.2 The University seeks to ensure that all staff and students have fair access to the full range of University facilities, and that adjustments to working and learning practices are considered wherever reasonable in order to remove any substantial disadvantages faced by disabled people, and more broadly to accommodate a diverse community (see further details in section 4.3.8 and Annex A.)

4.1.3 Through training and awareness raising, the University seeks to ensure that all members of our community know what behaviours are expected of them and what to do if they experience, witness or are alerted to an alleged incident of bullying, harassment or discrimination, and that they know that they are safe taking action. We can offer support, guidance and appropriate training to those whose behaviour does not meet the University's expectations. See Annex A for further details and links to relevant guidance.

4.1.4 The University takes incidents of discrimination, bullying and harassment, victimisation and violence very seriously. Where appropriate, disciplinary action will be taken under staff or student disciplinary procedures. All allegations of discrimination, bullying, harassment, victimisation and violence should be raised in accordance with this policy. See Annex A for further details.

4.1.5 The University will provide a range of support for staff and students who experience behaviours that are not in accordance with this policy. See Annex A for further details.

4.1.6 The University will take the steps that are reasonably practicable to take to secure freedom of speech within the law for its members and visiting speakers.

4.1.7 The University recognises that, on occasion, the views of some who exercise the right to freedom of expression within the law may cause offence, shock or disturb others who do not hold those views. This, in itself, is not a matter for constraint. Allowing opposing views to be heard will be encouraged and supported. The University also encourages everyone to express their views in a way that considers the impact on others and which respects the University's values of collaboration, courage, inclusion, integrity, kindness and openness. The University offers a range of support for staff and students who feel upset or negatively impacted by the expression of others' views.

4.1.8 For the avoidance of doubt, nothing in this policy should be taken to justify sanctioning academic staff for questioning or testing received wisdom or putting forward new ideas and controversial or unpopular opinions within the law, nor should this policy be taken to justify restrictions on freedom of speech beyond those provided within the law. Any person concerned that their rights of academic freedom or freedom of speech have been unjustifiably restricted may lodge a complaint using the appropriate University procedure, and may be able to complain via the Office for Students complaint scheme.

4.2 Expectations

4.2.1 The following expectations apply to all members of the University Community:

- to ensure that people are treated fairly and encouraged to reach their potential including in their access to jobs and study opportunities, and their progress through their career or course;
- not to discriminate, harass, victimise or bully anyone who falls within the scope of this policy (see section 2.1);
- to promote diversity and equality for students and staff and value the contributions made by individuals and groups of people with diverse characteristics and backgrounds;
- to promote and sustain an inclusive and supportive working, learning and living environment which removes barriers and disadvantages, where reasonably able to do so, in order to enable individuals to fulfil their potential, and which does not afford unfair advantage to any individual or group. This includes making reasonable adjustments for staff or students with disabilities. (Please see further details in section 4.3.8 and in Annex A);
- To foster a positive culture for working, learning and living which promotes freedom of thought and freedom of expression within the law;
- to treat all individuals and groups fairly and with dignity and respect at all times, including those who express views which may differ from our own;
- to seek to express our views in ways that do not create an environment that is intimidating, hostile, degrading, humiliating or offensive to others, and which respects the University's values of collaboration, courage, inclusion, integrity, kindness and openness;
- to recognise the right of staff, students, and visiting speakers to hold opinions, and to receive and impart information and ideas, so long as they do not break the law;
- to recognise the right of academic staff to (a) question and test received wisdom and (b) put forward new ideas and controversial or unpopular opinions, without placing themselves at risk of being adversely affected (by losing their job or privileges at the University, or reducing their likelihood of

securing promotion or a different job at the University) for doing so as long as they do not break the law;

- to work and study collaboratively, collegially and effectively in teams within and across organisational units;
- to identify and challenge unacceptable behaviour when it occurs, even if it is not directed at ourselves;
- to address and resolve matters ourselves, where reasonably possible, in a positive and constructive way;
- to raise serious concerns with relevant University staff and participate positively in approaches to resolve them (see Annex A for further details);
- not to retaliate against or victimise students or staff who complain about or report discrimination, harassment, bullying or victimisation; and
- to modify our own behaviour should we become aware that we have behaved unacceptably in relation to this policy.

4.3 Definitions

4.3.1 Dignity and Respect

4.3.1.1 Granting dignity and respect to others means having due regard for their feelings, wishes and rights as fellow human beings.

4.3.1.2 Our core values are collaboration, courage, inclusion, integrity, kindness and openness, and we seek to embody these in all we do so that all members of our community can make a contribution and thrive. This involves positive communication, being supportive, and understanding different perspectives.

4.3.1.3 All members of the University Community and visitors can expect to be treated in a friendly, courteous and dignified manner on an everyday basis. Members of the University Community should always be mindful of addressing others politely and with sensitivity, whether interactions are face-to-face, on the phone, via email or online (See Annex A for further details of the University's Social Media Policy).

4.3.1.4 Members of the University Community and visitors can expect to be valued for their skills, abilities and the contributions they make to the University community. We undertake to be constructive and kind when we challenge people expressing different viewpoints or when we provide feedback to each other. When managers or tutors make reasonable and appropriate requests of their staff or students, or are providing feedback about performance or behaviour, we always expect this to be done in line with the principles of dignity and respect; in return, those staff and students receiving such feedback are expected to treat their managers or tutors with dignity and respect.

4.3.2 Bullying

4.3.2.1 Bullying is not defined in law, however, the University understands it to involve unwanted acts or behaviours that undermine individuals personally and/or professionally. Bullying can be threatening, insulting, abusive, humiliating, disparaging, hostile or intimidating behaviour and/or an abuse or misuse of power placing inappropriate pressure on the recipient which can affect self-confidence or has the effect of isolating or excluding them. It is fact and context specific.

4.3.2.2 Bullying may consist of a single incident, sporadic events or a continuing process. Behaviour that may appear trivial as a single incident can constitute bullying when repeated.

4.3.2.3 Bullying is not always deliberate; someone may demonstrate bullying behaviour without intending to. Whichever form it takes it will often cause embarrassment, fear, humiliation or distress to an individual or group of individuals.

4.3.2.4 Bullying may be by an individual against another individual (perhaps but not only by someone in a position of authority such as a manager or tutor) or against groups of people (a person may act in a bullying manner towards several colleagues). Similarly, a group of people may also be responsible for bullying behaviour towards an individual or other group (for example, if a group of staff members act in a way that leaves an individual or group feeling isolated or excluded). People in positions of authority can be bullied by those who are not (for example, staff may be bullied by students).

4.3.3 Discrimination

4.3.3.1 Direct discrimination: treating someone less favourably because of a 'protected characteristic'. For example, rejecting a job applicant because of their religious views, philosophical beliefs (such as gender critical beliefs or ethical veganism) or because you consider that they might be lesbian or gay. Direct discrimination can include associative discrimination, where a person is treated less favourably because of their association with an individual with a protected characteristic, and perception discrimination, where a person is treated less favourably because of the mistaken belief that they possess a protected characteristic.

4.3.3.2 Indirect discrimination: a provision, criterion, practice or policy that applies to everyone but especially disadvantages a group of people with a particular protected characteristic, and is not objectively justified (i.e. is not a proportionate means of achieving a legitimate aim). For example, requiring someone to drive might affect younger people or some disabled people. Such a requirement would be discriminatory unless it can be demonstrated that it is objectively justified.

4.3.4 Harassment

4.3.4.1 Harassment - use of words or behaviour that threatens, intimidates, humiliates, causes distress and/or demeans someone - may be both an offence under the criminal law and behaviour that is prohibited under the civil law. A victim of harassment may report the matter to the Police at any time and is particularly encouraged to do so if they feel their safety is under threat.

4.3.4.2 Equality legislation makes harassment related to a protected characteristic unlawful. This protection is afforded to people who find the behaviours offensive even if they do not possess the characteristic.

4.3.4.3 The Equality Act 2010 offers protection from:

- unwanted conduct that is related to the protected characteristics of age, disability, gender reassignment, race; religion or belief, sex, or sexual orientation and that has the purpose or effect of violating the person's dignity or creating an intimidating, hostile, degrading, humiliating or hostile environment for that person;
- unwanted conduct of a sexual nature (sexual harassment);
- less favourable treatment for rejecting or submitting to sexual harassment or harassment related to sex or gender reassignment.

4.3.4.4 Harassment that is targeted at an individual or group of individuals may occur on the grounds of:

- a person's actual personal characteristics – e.g., a person's views are persistently ignored or not sought because they have a diagnosis of mental ill health;
- a person's perceived personal characteristic – e.g., homophobic/ derogatory remarks are made to a person assumed to be lesbian or gay, whether they are or not;
- the characteristic of a person with whom someone is associated – e.g., a person is harassed because of the religious or philosophical beliefs of a relative or friend.

4.3.4.5 Harassment need not be intentional. Where the unwanted conduct does not have the purpose of harassing, the perception of the person who considers they have been harassed, is particularly important. The individual's perception will be taken into account along with other circumstances and whether it is reasonable for the conduct to have had that effect on the person.

4.3.5 Objective Test

4.3.5.1 Behaviour or actions that are found objectively to be discriminatory, bullying or harassing will be subject to the relevant University procedure.

4.3.6 Victimisation

4.3.6.1 Victimisation occurs when a person is subjected to a detriment because they have, in good faith, made an allegation of harassment or discrimination, or have indicated an intention to make such an allegation, or have assisted or supported another person in bringing forward such an allegation, or participated in an investigation of a complaint, or participated in any disciplinary hearing arising from an investigation.

4.3.7 Freedom of Speech, Freedom of Expression and Academic Freedom

4.3.7.1 Staff, students and visiting speakers have the right to impart ideas, opinions or information so long as they do not break the law.

4.3.7.2 Academic staff also have the right, as part of their academic role, to (a) question and test received wisdom and (b) put forward new ideas including controversial or unpopular opinions, without placing themselves at risk of being adversely affected (by losing their job or privileges at the University, or reducing their likelihood of securing promotion or a different job at the University) for doing so as long as they do not break the law.

4.3.8 Reasonable Adjustments

4.3.8.1 Where a provision, criterion or practice, or physical feature puts a disabled member of staff or a student at a substantial disadvantage in comparison to a member of staff or student who does not have that disability, the University has a duty to take such steps as it is reasonable to have to take to avoid the disadvantage (make 'reasonable adjustments'). For example, providing an adapted keyboard to a member of staff with arthritis who has difficulty typing with a standard keyboard.

4.3.8.2 A member of staff or student will be considered to have a disability for the purposes of their right to reasonable adjustments, as defined above, if they have a physical or mental impairment; and the impairment has a substantial and long term adverse effect on their ability to carry out normal day-to-day activities.

4.3.8.3 Managers should work proactively and collaboratively with staff to put in place workplace adjustments. Effective workplace adjustments remove barriers to enable staff to fulfil their potential and benefits the University.

4.3.9 Violent Behaviour

4.3.9.1 Violence is the intentional use of physical force, threatened or actual, against another person, or against a group or community, which either results in or has a high likelihood of resulting in death, disability, injury, or harm (physical or psychological).

4.3.9.2 In line with the University's Definitions of Violence (linked at the end of this policy), violence includes: workplace violence, sexual violence and misconduct, domestic violence, coercive or controlling behaviour, stalking, hate crime, cyber abuse, and so-called 'honour' based violence.

5. BREACH OF THIS POLICY

5.1 We encourage any staff member or student who considers that they have been the victim of discrimination, harassment, bullying or victimisation to follow the process for resolution accessible through the links in Annex A, as applicable.

5.2 Any breach of this policy may be considered to be a disciplinary matter and be dealt with in accordance with the applicable procedure (See Annex A for further details). Making an allegation in bad faith, or that the complainant knows to be untrue may be considered to be a disciplinary matter and be dealt with in accordance with the applicable procedure.

5.3 In exceptional cases, where the University becomes aware of concerns of bullying or harassment, the University may investigate the situation to ensure the safety and wellbeing of all who may be affected by the alleged behaviour, even if an individual decides not to make a formal complaint. Where, following investigation, there is found to be evidence of bullying and harassment then this could result in action being taken under the applicable procedure.

Review / Contacts / References

Policy title: Dignity, Respect and Inclusion Policy
Date approved: 12 July 2024
Approving body: University Council
Last review date: June 2024
Revision history: V 16.0
Next review date: June 2027
Policy owner: Human Resources
Lead contact / author: Assistant Director of HR (Culture, Equality and Inclusion) & Deputy Director for the Student Experience

Appendix 6: University of Sussex commitment to the Declaration on Research Assessment (DORA) [in full]

The University of Sussex is a signatory to the San Francisco Declaration on Research Assessment (DORA) and commits to two key principles for assessing and evaluating research quality:

Principle 1: Research outputs and other research contributions will be evaluated on their intrinsic merit, rather than relying solely on inappropriate proxies and metrics such as the title or impact factor of the journal in which the research was published.

Principle 2: The quality of a researcher's work will be evaluated in terms of a wide range of contributions beyond research publications, such as datasets, training of early-career researchers, and impacts on policy and practice.

Advancing research and impact across all disciplines

Implementing these principles is recognised – by the University of Sussex, other academic institutions and organisations, major funding bodies, and stakeholders across the world – as beneficial both for the advancement of research and impact across all disciplines and for the career development of individual

researchers. This is true at all stages of an academic career, from reviewing progress during doctoral training through to assessing research by established professors.

1. By being explicit about the criteria used to evaluate the intrinsic merits of research contributions, and by assessing a wider range of meaningful and impactful indicators of research quality, benefits will accrue to individual researchers whose work may otherwise be under-valued by practices that prominently prioritise crude proxies such as Journal Impact Factor.

2. Alignment with these principles can also help to widen researchers' access to appropriate outlets for their work, reducing structural inequalities that influence recruitment, promotion, and pay review.

3. A research and impact culture based upon these principles will foster a more inclusive approach to demonstrating the value of the academy to society. The more rounded consideration of researchers' profiles, recognising and celebrating contributions beyond a narrow listing of research publications, offers more opportunity for knowledge mobilisation and exchange, thereby facilitating impactful outcomes.

Implementing the DORA principles

The University of Sussex embarked upon an institutional project led by the then PVC (Research & Innovation), Professor Keith Jones, to build on existing good practice and to ensure that these principles are implemented and embedded across the institution. The main implementation work is underway, including establishing a sustainable process for ongoing monitoring and review of this implementation. The implementation plan includes five major strands of activity.

1. The implementation includes a comprehensive audit, review, and (where relevant) revision of all relevant research assessment systems, policies, and practices throughout the academic career journey. We have overhauled the appraisal system following extensive engagement with the academic community (including researchers) and we are now actively promoting and encouraging all academics to use the new Achievement and Development Reviews process/system to support career development.

Probation review is underway and benchmarking against the sector has taken place. This will form part of an overarching process that has reviewed job descriptions for all academics including researchers, which will lead in (quickly) to reviewing promotion processes and criteria, this work was completed at the end of 2023.

2. The implementation includes extensive work to raise awareness, provide training, and offer guidance and advice to researchers and Professional Services staff across all divisions. This consolidates and builds upon training and guidance that is already in place to support researchers' understanding of responsible metrics. This is complemented by an ongoing programme of both internal and external communications and advocacy, to share and celebrate progress with the implementation.

3. The implementation includes systematic approaches, targeted resources, and digital tools that enable researchers to collate and present the full spectrum of their research contributions and outcomes, beyond a traditional listing of research outputs. We have expanded use of our Elements research information system

with appropriate capability-building and training for researchers, as well as a clear interface with our systems and processes for research assessment and planning.

4. The implementation includes engaging with external partners, both in academic and non-academic sectors, to highlight and spread our commitment to these principles. We are showcasing this commitment in our interactions with external organisations, such as publishers, funding bodies, professional bodies and societies, and non-academic partners, and we explicitly demonstrate our alignment with other institutions and organisations that have also committed to these principles, including many universities and funding bodies globally.

5. The implementation includes the establishment of a monitoring and review process, enabling regular institutional review of adherence to these principles, as well as mechanisms for reporting and addressing breaches of the principles.

Ensuring the effectiveness of our implementation

We recognise that effective implementation of the above principles introduces a number of challenges that need to be addressed in order to avoid confusion, to reduce researcher burden, and to address inequalities. The consideration of a wider range of research outputs, contributions and outcomes on their own merits raises a number of specific challenges, and we have identified several priorities for the implementation of the principles.

1. Ensuring that all staff involved in collating and submitting research for assessment, or in scrutinising and reviewing the quality of such submissions, are allocated appropriate time and support for doing so, without creating any unnecessary or unreasonable burden.

2. Addressing concerns about departing from established evaluation frameworks within particular disciplines, particularly where these may still be used by competitors and external stakeholders.

3. Maintaining a high level of rigour and robustness in all assessments of research quality, with advance planning to address unconscious bias and/or structural inequalities relating to the preparation and assessment of qualitative narratives about research quality.

4. Identifying the opportunities afforded by alternative metrics used to evaluate research quality of individual outputs and other contributions, and ensure that these are factored into research assessment processes where appropriate. A Publication Metrics guide has been developed and shared to explain both traditional and alternative metrics.

5. Achieving clarity in advice and guidance for staff researchers, notably early-career researchers, with regard to the appropriate balance of research activities needed for career development.

6. Reducing administrative burden by supporting academic Faculties to use our Elements research information system to collate and report on the full range of research outputs, activities and outcomes achieved by their researchers.

The work to formulate this statement of commitment and to formulate the key framework for the action plan was undertaken by a Working Group consisting of: senior academics from different disciplines; leaders from professional divisions for Research & Innovation, the Library, Human Resources, Planning, and Communications; and early-career researchers. Following consultation within academic Schools and the above Professional Services divisions, this statement of commitment was approved by the University's Research and Knowledge Exchange Committee (now URIC) in December 2020.

Appendix 7: Equality Impact Assessment
To Follow