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# Consultation on the second Research Excellence Framework

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## 1. Respondent details

Responses to this consultation are invited from any organisation, group or individual with an interest in research or research assessment. We will publish an analysis of the consultation responses. We may publish individual responses to the consultation in the summary. Additionally, all responses may be disclosed on request, under the terms of the relevant Freedom of Information Acts across the UK. Responses to this consultation are unlikely to be treated as confidential except in very particular circumstances. Please note that each question has a limit of 500 words.

**Please indicate who you are responding on behalf of**

- As an individual
- Higher education institution
- Subject association or learned society
- Representative body
- Department or research group
- Business
- Charity
- Public sector organisation
- Other

Please provide the name of your organisation

University of Sussex

## 2. Overall approach

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

We support an approach that provides overall continuity with REF 2014, with positive incremental change. We particularly urge the funding bodies to seek to limit the burden of any changes made to the approach.

Aside from burdens on institutions and panels, we are also aware of the burden on the audit process that can arise from unnecessary complexities and subjective judgements. Questions of interpretation can create time-consuming processes, debates and disputes.

We would caution the funding bodies from taking a selective approach to the Stern Review's recommendations, as this could have the effect of undoing their combined benefits.

### 3. Unit of assessment structure

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

We suggest that UoA 36 is incoherent. It puts together media/cultural studies with library/information studies and the two are very different. This is not just at the surface, as the underlying theoretical frameworks are often at odds. This may lead to two groups of panel members needing to operate almost in isolation from each other.

In terms of digital studies, this ranges across digital media, internet studies, digital humanities, and digital culture. Whilst there might be a view that these areas should be consolidated, this is probably not necessary, in particular because all areas of cultural and social studies now need to take account of the digital. There may need to be specific handling of digital media as practice, as this can span computer science and media studies.

We believe that it would be appropriate for Geography and Environmental Studies to be a single UoA, and note that it is likely to require a larger number of panel members working in fields cognate to environmental science, such as climate science and hydrology.

Across the Units, we believe that retaining and enhancing flexibility in the definition of the areas covered is desirable, to allow institutions to submit their research as it is performed. There are a range of areas that relate to more than one UoA, and hence submission of groups of research might easily sit within more than one Unit.

We note the consultation document's observation about HESA Cost Centre alignment. Given other elements of the proposed changes, which would involve greater use of HESA data on a cost centre basis, we encourage the funding bodies to maximise the alignment between UoAs and Cost Centres wherever possible, and certainly not to undermine any existing alignments.

We also note the suggestion of separate output sub-profiles for areas within a UoA. It is not clear whether this is proposed for the UoA as a whole, or for each submission. Equally, how will relevant outputs be identified? Will that be determined by the sub-panel, or will the submission be required to indicate which area applies to each output (and could multiple disciplines and sub-disciplines be chosen for a single output to reflect multi- and interdisciplinarity)? On the surface, this sounds like an interesting idea, but we believe that there is a danger of over-complexity and hence burden as a consequence, for

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both institutions and panels, including the need to define the sub-profile areas in the first place.

## 4. Expert panels

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

Yes

No

Comments:

There has been positive evolution over successive RAEs and the REF, one element of which has been increasing consistency in the guidance and documentation. Taking this one step further, as proposed, by developing the guidance and the criteria together, has our full support. It is likely to produce a more coherent and consistent set of requirements, rules, guidance and examples. Equally, whilst earlier publication of the guidance and criteria are welcomed, we would wish to avoid too many later stage amendments or substantive clarifications, as that will disrupt preparations and create additional burdens.

We recognise the potential disadvantages of this approach, in particular the potential for sub-panel members to feel less ownership of the criteria. The key issue will be to address their understanding of the criteria, as that would otherwise have been developed as part of the criteria development process. The funding bodies will therefore need to put in place additional training and support for sub-panel members in particular at the start of their involvement.

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

Yes

No

Comments:

Whilst supporting this proposal, which enables a reflexive response to unanticipated issues, we suggest that it may be wise to appoint one or two sub-panel members at an earlier stage where a UoA has a particularly wide and diverse portfolio of areas and types of research.

We encourage the funding bodies to appoint all sub-panel members as early as possible, to enable pre-assessment meetings that were viewed as very important in REF 2014 in facilitating consistency of approach and a sense of joint ownership. The funding bodies should ensure that sub-panel members have adequate training and support at the start of their involvement.

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

Yes

No

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Comments:

No comments.

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

We believe that it is appropriate to operate an open nomination process, as the specific exclusion of HEIs is anomalous, given that many of the same individuals are able to nominate through subject associations or associations of professors. HEIs being nominators may also help the funding bodies address the representativeness of the panels. It may also be the case that some areas of activity are not adequately represented by a learned society, academic association or equivalent. This may be especially true of new, emerging or fast-moving disciplines.

The nature of the institutional level assessments might require inclusion of a set of assessors that might not have been thought relevant in the past. In particular, individuals with experience of institutional research management, who would not normally be nominated by disciplinary-based subject associations, may be relevant.

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

Yes

No

Comments:

We support the suggestion that nominations should be supported with relevant E&D-related information, but also recognise the practical difficulties that this might pose in some instances.

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

No comments.

## 5. Staff

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

We understand the funding bodies need to have a verifiable basis, but this proposal raises a number of concerns. It is based on an assumption about the way in which institutions determine their HESA staff return. The mapping of staff to cost centres is as much, and often more, about their departments' teaching profiles than each individual's research activities. Institutions may be unwilling to adjust their approach to meet the REF requirements because of the potential consequences in the TEF or other teaching-related assessments or processes. This is a particularly good example of where the different

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branches of the funding bodies and associated agencies need to be fully and closely aligned.

Alongside this data-driven issue, there are other concerns relating to the nominal nature of the assignment of a cost centre in comparison to the carefully considered alignment of areas of research (and hence individuals) to the UoA that is best placed to assess them. In the 2014 REF the University had individuals in an organisational unit who were submitted to a different UoA from the bulk of their departmental or school colleagues, because that was the best location for the assessment of their research.

We understand from the funding bodies that, using this mapping simplistically, the number of submissions would increase from about 1,900 to about 2,500. That suggests a significant increase in burden on both institutions and panels. It also suggests a fracturing of the research base, with many, small submissions created, for which there would not be a viable environment. A cost-centre based mapping is also likely to produce a very significant increase in cross-referrals.

If the HESA record were to include a teaching-related cost centre and a research-related cost centre (or better the UoA), that might help to resolve the difficulty. We recognise that the timescales for changes to the HESA return process may act against this approach, but we encourage exploration of the possibility. We note that institutions are currently required to report the REF 2014 UoA of their PGR students' supervisors (whether or not the supervisor was employed or submitted by the institution in that exercise). It would therefore seem to be a relatively simple extension, albeit across two HESA Returns, to require institutions to report the (nominal) UoA of the individual for the previous REF, which would provide the starting basis for mapping of FTE to UoAs for the subsequent REF.

An approach that involves some dialogue between the funding bodies and each institution to agree a distribution of the recorded FTE, using the HESA record as the starting point, might be feasible. If it were based on the proposal above to report UoA against staff on an annual basis, this could provide the funding bodies with the necessary assurance, whilst also allowing institutions the flexibility to present their research in the most meaningful and appropriate way.

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

We are concerned that the proposal to require a measure of independence is potentially burdensome, and will be open to interpretation and hence disagreement. The guidance in 2014 with respect to research assistants led to some protracted discussions about whether an individual could be deemed to be 'independent' or not. Similarly for the ECR flag and the timing of independence. This created potential tensions between an institution and a member of staff, as the motivations were not necessarily aligned. The test of independence seems to be targeted mostly on those early in their research careers, or those who have changed careers, which may have adverse effects on inclusivity of their research (actual or perceived). The specific nature of the effect will also depend on the timing of the test in relation to the individual's career stage and trajectory.

The consultation is not clear whether the test only applies to staff on 'Research-only' contracts, or also to those on 'Teaching and Research' contracts. It may be the case that someone in the latter group is not undertaking research on an independent basis, or is no longer doing so. Needing to apply the test to all staff in both groups (for the purposes of equality) increases the burden.

The test for independence would also need to apply for some or all of the period, rather than just on the census date, otherwise there would be anomalous effects, including on the calculation of the unit's

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independent research capacity.

We note that the definition of 'research-active' (or independent researcher) is only for the purposes of defining the FTE to then be able to calculate the number of outputs and impact case studies required. It does not determine that each of the individuals represented by that FTE necessarily have to provide an output.

If the funding bodies wish to introduce such a measure of independence, it may be necessary to do so via an assessment against a set of possible characteristics, a number of which would need to be met. This would provide a more nuanced approach than was available in REF 2014. It would also be sensible to introduce an indicator in the annual HESA staff return, to be able to make use of the information across the whole of the assessment period.

We recognise the potential for effects on staff contracts. However, we believe that this could be mitigated if the funding bodies (and the sector in response) would move away from the concept and language of submitting individuals. The academic population FTE over the census period defines the volume of materials that need to be provided for assessment. The materials provided, in our view, could and should be based on research undertaken at the institution regardless of the status of the individuals involved. This more inclusive approach would, for example, enable appropriate contributions from PGR students as well as research assistants.

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

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

We fully support the proposal to use the average FTE over a period, and would suggest that the whole census period is the appropriate timescale to use, as that indicates the intellectual capacity that was available to generate the research to be assessed. It also takes account of units that have seen substantial changes in their number of staff.

We recognise the need to limit any increase in burden on the panels, and therefore support the requirement of an average of two outputs per FTE.

We note the concerns that the research of certain groups, such as ECRs, may be under-represented. However, we do not believe that the level of representation is likely to be any less than in the last REF (where many ECRs were able to submit only one or two outputs because of individual circumstances). It is interesting to note that in 2014 efforts were made to reduce the burden on specific groups, such as ECRs, to ensure that they and their research were included, whereas now there seems to be a desire by some to increase the burden on them, by expecting a number of outputs similar to that of more established staff. We are concerned to ensure that ECRs are not judged solely on their ability to produce at least one very high quality output, as opposed to their longer-term potential to contribute. Their publication strategies should not be dictated by an assessment mechanism such as the REF, but informed by longer-term career and other ambitions. The funding bodies will wish to ensure that the equality and diversity aspects of this are adequately covered in Codes of Practice, including recognition of behaviours by institutions and academic managers outside the REF process itself, such as in recruitment, reward and promotion processes. The funding bodies may wish to consider requiring a statement alongside the outputs, or as part of the Environment, to explain how the chosen outputs reflect the unit, and addresses equality and diversity considerations.

Wishing to have a test of independence of an author before their research can be included for

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assessment seems to be a more discriminatory approach. If the funding bodies were to take the approach we suggest, and allow outputs from any authors based at the institution, then the potential for inclusion of these groups ought to be maximised.

We are aware of the probable effects that this average would have at submission and institutional level across different types of institution: some institutions being required to submit fewer outputs than they did in the 2014 REF, whilst others may need to provide several times more outputs. A definition of independence that is applied to all relevant staff (i.e. to 'Teaching and Research' and as well as to 'Research-only') might have the effect of substantially reducing the number of outputs required by the latter group of institutions. That volume of independence would be recorded in the annual HESA staff returns, and hence would discourage tactical decisions in the context of the REF.

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

We accept and support the arguments for having a maximum number of outputs per person. We also support that number being six, with some practical reservations.

The notion of a maximum raises the question of how that is defined for multi-author papers. Given the principle of decoupling, any output can only be submitted once (per UoA submission). An institution would need to decide with whom to associate each multi-author output. The previous test (in some cases) that the institution needed to demonstrate that an author made a substantial contribution to the output would be replaced by the requirement to show that the output was demonstrably produced at the institution, via the contributions of all of the institution's co-authors. Where the output is co-authored across institutions, this would require that the institution made a substantial contribution via all of its co-authors.

As there would be a need to attribute each output to one author, in order to manage the maximum, the institutional process of making the choice of author (having selected the output) would be worthy of consideration in the Code of Practice. It should be noted that this needs to be separated from any internal assessment of an individual's outputs, which would include all of their contributions.

Whilst supporting these principles, we would note that having a maximum number of six outputs per person means that there is potentially increased institutional burden of reviewing which outputs to select. We are also aware of some concerns that staff with significant numbers of relevant outputs may be favoured outside the REF process over those with fewer relevant outputs.

We are aware of some suggestions that a maximum of four outputs should be chosen. Whilst this would reduce the reviewing burden just mentioned, it would potentially increase the pressure (perceived or otherwise) on individual members of staff, especially in institutions with diverse portfolios of activity.

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

If there were to be a test of independence to define staff eligibility, then it may be reasonable to expect each named person to be associated with at least one output. However, this approach is harking back to the model in which staff are submitted and there is coupling between staff and outputs.

In addition, requiring one output per person (as opposed to per FTE) would potentially discriminate against staff on part-time contracts of employment, and especially those on substantially part-time contracts. If the funding bodies decide to operate a minimum requirement of one output per person, we suggest that it should potentially only apply to those employed at an average of 0.5 FTE over the census

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period. That in itself is an arbitrary fraction, and retains an element of burden. It also prompts other cases where the individual was effectively not working at capacity (e.g. for reasons of sickness or parental leave), and hence reintroduces the consideration of individual circumstances, and all of the burdens of that process.

Individuals moving into the sector (e.g. from industry) towards the end of the census period could also be disadvantaged, as there would be a requirement for them to provide at least one output of appropriate quality, which may not be feasible. This would seem to be counter to the desired direction of travel with respect to collaboration and mobility between sectors.

If there were to be a requirement of a minimum of one output, there may be an output available, but it may not be of a quality that the individual or the institution would otherwise wish to submit. In including such outputs, the profile of the submission, the subject, the institution, and the sector would be negatively affected. The funding bodies may wish to consider the wider effects that this would have. This would also be affected by the nature and breadth of the test of independence.

We support the Stern Review's original proposal, that there should be no minimum requirement, and that there be no test of independence. Such an approach would make the calculation of the FTE simpler, and remove any unnecessary burden on those staff not in a position to produce an output independently. In the case of ECRs, in particular, there is a danger that they may only be valued if they are deemed to have produced one very high quality output, as opposed to being recognised for their longer-term potential to contribute. A further observation is whether a suitable output produced by an employee whilst they were a PhD student would be eligible. If not, it would seem to discriminate against ECRs requiring a minimum of one output.

An alternative approach, if one were needed, might be to set a minimum threshold of the proportion of staff that should be associated with at least one output; e.g. 80%. That would allow flexibility about individuals' capacity as well as limit the possibility of a submission being dominated by too small a number of staff.

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

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

We support the principle of using acceptance for publication as a marker, but also recognise the difficulty of defining this for a range of output types. For some outputs, it may only be possible to use the date where the output came into the public domain, e.g. for works of art and similar. The funding bodies may therefore wish to consider different requirements in this respect for each output type, so that the requirement fits the type, rather than having one requirement that does not fit all types.

In terms of meeting the requirement that an output was demonstrably generated at the submitting institution, we suggest that each output should be accompanied by up to 100 words, in which the output's heritage might be explained. This might parallel or replace the requirement in REF 2014 for evidence of the author's contribution to multi-author outputs. Guidance for institutions would be needed to exemplify the range of circumstances that would be acceptable. In order to minimise the burden that this creates (for author and reader), it might only be required for outputs where there could be some dubiety, in a similar manner to the consideration of exceptions to the Open Access requirement. Institutions will need to have appropriate approaches to make decisions themselves, e.g. as part of their Code of Practice, but will also be concerned to understand how the panels will make their judgements.

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

The University would face similar challenges to those of other institutions, namely the demonstration that an output had been substantially generated at the institution, and when it was 'accepted' for publication (or equivalent).

In addition, we and other institutions may have to consider how to capture and evidence outputs from members of staff who are no longer at the institution, as those outputs will be equally eligible. Whilst existence of an output ought to be less of a challenge, full evidence of its production at the institution might create some burden. This will be particularly challenging for multi-author, multi-institution outputs, and for long-gestation or portfolio outputs where the author has moved.

Whilst we support the principle of non-portability, we also recognise that institutions and individuals have been operating to date on the basis of portability. It may therefore be better to introduce it from a future date, e.g. from January 2018 by announcing this as part of the decision about principles. It would thus provide a simple mechanism of introduction, rather than a retrospective application of a fundamental principle.

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

We support the principle of non-portability, as proposed by the Stern Review. The REF is a review of the research of an institution, not that of each individual. Indeed, the recommendations of the Stern Review and the proposals in this consultation seek to emphasise this, and thus to remove or reduce the stress on the individual.

Previous studies (including one for the funding bodies) have suggested that the 'transfer market' is no higher in the HE sector than in other professions, but the REF and its predecessors have been perceived as skewing the process. Aside from the effects and costs of actual transfers, there are also concerns about the costs of retention. The latter will be less transparent other than to those at the most senior levels in an institution. We would not wish to see a new approach in the next REF creating a restriction on movement of staff, or of affecting the fluidity of the processes, which would have a dampening effect on the vibrancy of the sector and the possibilities for career development. Indeed, we would wish to see something that supported appropriate movement. The funding bodies may wish to consider a means of regularly monitoring movement within the sector. This might be extended to include movement to and from the sector, which speaks to other aspects of this consultation.

We do not believe that non-portability would restrict the movement of researchers between industry (or other sectors) and HEIs. Indeed, the package of recommendations of the Stern Review together provide a means of encouraging such movement. Taking a selective approach to the Review's recommendations could have the effect of undoing their benefits.

With respect to ECRs, we believe that institutions should be encouraged to value this group of staff for their potential, rather than by expecting them to arrive with a dowry (of one or more suitable outputs). In recruiting and developing an individual, one should be taking into account their capability and potential for long-term contribution, in a positive and constructive manner, rather than as commodities to trade. Indeed, in the context of portability, there would be pressure on individuals to have an output of the highest quality, as anything less might deem the individual not to be of value. We have observed that, having being included in REF 2014 with a single output believed to be highly rated, an ECR has then potentially been exposed to an expectation of continuing performance at that level, despite all of the other expectations that are placed on a junior member of academic staff.

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We also believe that it would be more profitable to place the requirements on institutions to articulate the number, development and career progression of their ECRs in the Environment statement, noting that ECRs are not a homogenous group. This would be suitably encompassed in the proposed template approach.

We suggest that the funding bodies consider piloting non-portability, to explore what this might mean for whole submissions and for particular groups of staff.

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

We do not support this approach, and would refer the funding bodies back to the 2001 RAE in which a similar approach was tried (via the use of Category A\*), and not included in subsequent assessments.

We believe that approaches to sharing, and portability for some individuals hold dangers of additional complexity, burden and dispute, both between institution and individual, and between institutions. We do not support the introduction of such additional features.

Removing portability restrictions from particular individuals or groups potentially raises complications, and may not only encompass those individuals with the target characteristics. In addition, it is worth noting that a number of individuals will not have been included in REF 2014 for tactical reasons, and for reasons to do with the availability of suitable case studies.

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

Yes

No

Comments:

We believe that it is appropriate to mandate ORCID as the staff identifier, in order to maximise the benefit of access to dispersed information, and to be a step towards a better, more complete national record of research activity and expertise (in line with one of the recommendations of the Nurse report). The ORCID could be part of the annual HESA Staff return.

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

Given the evidence from REF 2014, of only 304 instances of Category C staff, we support the proposal to remove this Category.

Whilst supporting the proposal, we would note that, although not detailed in the consultation document, we imagine that these individuals were disproportionately represented in a small number of UoAs, and hence the effects of their non-inclusion may need closer examination for those UoAs. It is also likely that those submissions including Category C staff valued them highly, given that they contributed to quality but not to volume.

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

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We agree that the definition of research assistant (and of early career researcher) caused difficulties of interpretation in REF 2014.

We believe that by using the total FTE of staff on 'Teaching and Research' and 'Research-only' contracts, and accepting outputs from any author who undertook the research at the submitting institution, without a test of independence, the need for a separate definition is removed.

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

We welcome this proposal, and believe that it will help to eliminate inappropriate practices whilst supporting the inclusion of the research of those staff who are genuinely engaged in research at the submitting institution, such as practitioners. However, in taking this approach the funding bodies will need to ensure that they are not treating (or requiring institutions to treat) this group of part-time employees inappropriately.

We would note that the Stern Review's recommendation that outputs should not be portable and would need to be demonstrated as having been produced at the submitting institution also supports the appropriate inclusion of the research of these individuals.

## 6. Collaboration

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

We agree that the proposed approach to outputs will enable the inclusion of outputs from those who have moved between sectors. As noted above, a requirement for a minimum of one output might mitigate against such movement, even though these individuals might be contributing substantially to the impact of the unit.

A holistic approach to the contribution of individuals needs to be taken: across the totality of the unit the submission will provide evidence of high quality outputs and impact, rather than the process requiring each individual to demonstrate both high quality outputs and high quality impact.

We also agree that requiring the provision of some data about the movement of people between the institution and other non-academic organisations would be sensible. This might include the number of individuals each year who have moved (separately for inwards and outwards), and a count of the number of organisations involved (which might be categorised into three or four very broad groups, such as government bodies, industrial and commercial organisations, charities and third sector bodies, and any other bodies).

## 7. Outputs

**16. Do you agree with the proposal to allow the submission of a reserve output in cases where the publication of the preferred output will postdate the submission deadline?**

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Yes

No

Comments:

We support this proposal, as we believe it is a pragmatic change, and mirrors the approach allowed for double-weighted outputs.

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

We believe that the approaches used in REF 2014 should be continued.

We do not object to the measures suggested in paragraph 72. However, we are not convinced that the champions would make that much difference. Mandating the interdisciplinary identifier might make a little difference, although that raises the question of whether the indicator would also mandate cross-referral. It also suggests that there would need to be a universal, workable definition of interdisciplinary research, which has not yet emerged. An explicit section in the Environment statement would be at least as valid in the institutional statement as in the relevant unit's statement.

As noted elsewhere, the funding bodies may wish to consider the ability to cross-refer whole submissions or defined research groups, rather than just individual outputs. This would enable coherent multi-disciplinary submissions.

An alternative to an interdisciplinary identifier is to have the relevant disciplines identified against each output. As noted in Question 2, this would be required if outputs sub-profiles are to be produced for distinct areas within a UoA.

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

Yes

No

Comments:

We agree that quantitative data should be used to inform the peer review assessment of outputs, as appropriate for the discipline and the form of output. We also agree that this decision, within a framework provided by the funding bodies, should be made by each sub-panel. We suggest that such data is more valid at an aggregated level than at the level of an individual output.

Any use of such data should be in line with the Leiden Principles and with the Declaration on Research Assessment, to which HEFCE is a signatory.

## 8. Impact

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

Yes

No

Comments:

We believe that it would be wise to maintain consistency as impact was only introduced in REF 2014. Whilst there was some initial negative reactions, the sector has generally come to terms with the benefits of demonstrating impact, and how to do so. It should therefore be given a chance to bed down further.

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

We have some sympathy for the Stern Review's recommendation, but believe that the REF 2014 definition of impact was fundamentally correct. It may be helpful to provide additional guidance on the range and types of impact that are permitted, but it seems to us that the REF 2014 rules already covered the substantial majority of the areas suggested.

We agree with this consultation document's proposal that research leading to academic impacts should not be assessed under 'impact', but that they are more appropriately assessed in the outputs or environment sections, such as in the contribution to the discipline(s) in the latter. For the avoidance of doubt, we also support the continuing possibility of presenting the effects of research on the wider pedagogy of a subject, beyond the submitting unit, as valid impact.

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

Yes

No

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

We welcome the alignment of the definitions used by these bodies.

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

We agree that it is important to maintain this approach. Any substantive change to the assessment criteria would undermine continuity. The guidance, to institutions and to panels, could presumably be enhanced with learnings from the REF 2014 panels' experiences.

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

We can see that having some more guidance on public engagement would be helpful, in order to support an institution's decision to include such a case, and to help ensure that it is appropriately presented. Whilst it may be problematic to point towards specific case studies from 2014, it ought to be possible to describe the key features that need to be represented. This particularly relates to the previous question,

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in that explaining what reach and significance means for public engagement would help institutions to decide to include such cases. We believe that allowing cases to be based on bodies of work may also encourage more public engagement cases.

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

Yes

No

Comments:

We agree strongly that impacts should remain with the institution(s) where the underpinning research took place. This helps to ensure the connection between actions to undertake and translate research that has societal benefit.

Whilst there may be a small number of practical arguments in relation to staff who have moved, there are equally potential questions of confidentiality about relevant information to which the new institution may not be or should not be able to access.

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

Yes

No

Comments:

We agree that the approach to impact should be an explicit element of the environment statement. Given the importance of impact, it is important that there is an opportunity and a requirement to describe the institution's and unit's approach to supporting this area of activity. We believe that providing context for the submitted case studies (as was required in 2014) is less important than showing how impact is generated, supported and enhanced by the institution.

Our only negative observation in this context is for the funding bodies to be aware of the danger of overly expanding the environment statement, as it is only worth 15% of the profile.

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

We agree that about the same number of case studies should be submitted, and that the same staff FTE should be used to determine the number required as is used for the number of outputs. Consistency in this would made for simplicity. Equally, as noted above for outputs, using the average FTE over the census period would better reflect the capacity of the unit to produce impact (although the underpinning research capacity is for the 20 year period rather than only for the census period).

Given the higher value of total number of research-active staff compared to the FTE submitted to the REF 2014, we can see that the formula will need to be adjusted, and support the proposal that the minimum number of cases required be one. This will also have the effect of reducing the burden on some units. In supporting the proposal, we also note the potential volatility of a submission's profile if it is based on only

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one case study.

One observation that we would make is that in using an FTE that comprises all 'Research-only' staff as well as all 'Teaching and Research' staff, whilst keeping the total number of cases the same at about 7,000, the distribution of required cases is likely to skew towards science subjects, as they have a greater proportion of 'Research-only' staff in comparison to the social sciences and humanities.

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

Yes

No

Comments:

No comments.

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

We agree with this proposal, but note that such requirements should not inhibit the ability of a unit to include material that best demonstrates the impact of its research, nor that there is any implied value to the types of impact that are able to use such additional fields. These fields are for analysis, not for assessment, as otherwise there is a risk of reverting to assessing only that which can be standardised.

If a web form is to be used, we recommend also providing templates that can easily be shared amongst those involved in developing the submission.

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

We strongly support this proposal. The effect of bodies of work are particularly relevant in policy and cultural areas, and for examples of public engagement.

The funding bodies will need to give some consideration to how a body of work is presented and evidenced. For example, would a quality threshold be needed, and what form might that take? It may be appropriate to provide reference to activities and positions, along with relevant funding, reports or other outputs.

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

Yes

No

Comments:

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No comments.

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

We agree that the 2\* eligibility criterion was sometimes problematic, and possibly led to some good case studies from being excluded. We therefore welcome a revision of the requirement. We believe that the threshold test might comprise a variable combination of factors, such as formal appointments, underpinning funding (including from non-standard sources), complementary publications as well as the more normal peer-reviewed outputs.

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

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

We can see the merits of the panels having access to the corroborating evidence. However, some may be disappointed by a lack of depth of the evidence, which may suffice for the purposes of audit, but may not add that much value to the assessment decision. Conversely, some evidence was very long and detailed, which would add to the burden on the panels.

Equally, it would require institutions to collect and submit all evidence, whereas some evidence took the form of contact points who could be contacted if required.

We received a number of requests from panels of this nature, and some requests that seemed to be more of an audit nature. The latter concerned us where they might lead into issues covered by individual circumstances.

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

We can see the advantages of guidance, for both institutions and panels, on the use of quantitative data. This might extend to recommendations in relation to the units to use. However, as with our response to Question 28, we would not wish the guidance to prejudice the types of impact cases that do not use such quantitative data. As with Question 18, this needs to be determined at the level of each sub-panel, within a general framework.

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

It would be helpful for the funding bodies to provide clarity that a case study can be submitted in multiple UoAs, so long as they each they contributed underpinning research.

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

We believe that examples of impact submitted in REF 2014 should also be eligible for REF 2021, in order

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to recognise long-term and long-running effects. We do not believe that there should be a requirement for any additional research as an entry criterion.

The panels would be able to judge whether, for example, continued sales were as valuable as new products or services based on the original research. Similarly, the effects of policy-related research may have reached a different stage of implementation; e.g. social effects of new legislation in comparison to the fact of new legislation in the REF 2014 case.

The presentation of cases at different stages of evolution was promoted in REF 2014, and hence to allow a case to be presented for a second time at a later stage seems to be logical. Institutions will need to invest in new initiatives, but should also be able to take credit for growing and evolving sustained impacts.

The funding bodies may need to consider specific guidance to panels in this area, in particular about not trying to ascertain or compare with the rating of the case study in REF 2014. The guidance should also be clear that resubmitted cases will only be assessed on the impact achieved during the assessment period.

It may be useful to the funding bodies to understand what proportion of case studies were submitted in the previous exercise, but we believe that it should have no bearing on the assessment of the case studies.

## 9. Environment

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

Yes

No

Comments:

We believe that a more structured template and the use of more defined data presentations would be appropriate and helpful. We would wish to see means of demonstrating contribution and service to disciplines and 'professional citizenship', as these are essential for the long-term health and reputation of research.

We anticipate that this might lead to additional data requirements for HESA, and ultimately potentially to a HESA Research return.

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

Some elements of the HE-BCI return, presented at UoA level, might be of benefit, to illustrate the level of external engagement and knowledge exchange. Whilst this is only currently reported at institutional level, it will have been collected at project and unit level in order to be aggregated, and hence should not be a substantive additional burden.

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Other suggestions that we included in our evidence to the Stern Review include:

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

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

As suggested above, providing data from the HE-BCI return at a unit level would help this.

Also, as suggested in response to Question 15, a table documenting the movement of individuals between the institution and non-academic organisations should be considered.

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

Yes

No

Comments:

We support the proposal that units and institutions should receive additional credit for their approach to open access where they can demonstrate delivering more than the minimum requirements.

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

We recognise the importance of appropriately managing and sharing research data. However, we do not have any specific recommendations, given the evolving nature of this area.

## 10. Institutional level assessment

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

We support the concept of an institutional environment statement, and believe that it would be a good way of capturing the institutional approach to and motivation for institutional-level actions. It provides an appropriate way of recognising institutional responses to substantive policy requirements. The institutional-level statement should be items that are specific to and best presented at an institutional level, so as to articulate with the unit-level statements.

Whilst supporting the concept, we wonder who is best placed to review the statements. A panel for this

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purpose may be appropriate, so that relative strengths can be assessed and compared, as long as that comparison takes account of the natural variations between institutions of different types and sizes. An alternative is that the institutional statement is considered by each sub-panel when reviewing the UoA statement, so that the latter is seen in the institutional context. An institutional environment profile would then not be produced.

If the assessment were to be separate and a profile produced, we believe that it should be incorporated in each UoA profile, but that the ratio should be 5% institutional, 10% unit.

We have most concerns about institutional-level impact case studies. The Stern Review's motivation for these was to support the inclusion of multi-disciplinary, interdisciplinary and collaborative cases. Whilst wishing to enable their inclusion, making this a mandatory requirement seems to be unnecessary and potentially counterproductive.

The proposal prompts questions as to how many disciplines (or UoAs) need to be involved to make it a valid case, what are the valid disciplines, and whether they all need to be from the submitting institution (an institution's best interdisciplinary work could be with collaborators from anywhere in the world, not just within their institution). We do not see the logic of incorporating the assessment of cases that derive from a subset of units into the profiles of all units, whilst the 'donating' units may have lost one or more of their highest quality cases.

As proposed, the value of an institutional case study would be higher than that of a UoA case study. We believe that this would have unwelcome effects on the decisions about the chosen case studies, and be seen to undermine individual subject areas. One effect could be to encourage selection of 'safe' examples, which may narrow the choices made; public engagement, for example, might not feature very frequently.

We suggest that all cases remain with the generating units, but that they are flagged as being multi- or interdisciplinary. In that way, an aggregated profile of such cases could be produced, if desired, and the originating units would retain their cases. In assessing such cases, they might usefully be referred to other relevant sub-panels. Treating multi-disciplinary cases in similar ways to multi-disciplinary outputs would seem to be appropriately consistent.

The institutional commitment to and support of impact is best described in the relevant section of the institutional environment statement, which could include examples of impact that did not form specific case studies, but which are nonetheless valuable.

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

A pilot of institutional-level assessment may not be necessary if the funding bodies were to adopt our above proposals. However, it may be worth considering forms of cases that are substantially collaborative, within and between institutions, and how best they might be presented. This should include the types of cases that institutions are suggested to have not include in REF 2014 because of concerns that they did not adequately meet the requirements of that exercise.

## **11. Outcomes and weighting**

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

As already noted, we do not agree with the logic for including the institutional-level case studies in all UoA profiles. Using our alternative proposal, any such case studies would be incorporated into their 'home' UoAs' profiles only.

Whilst it makes more sense to incorporate the institutional environment rating into each UoA, there are arguments for keeping it separate, both in terms of the published profiles, and in the way that it is subsequently funded.

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

Yes

No

Comments:

We believe that the move of the impact statement to become part of the environment statement serves to increase the proportionate weight of the impact case studies sufficiently.

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

Yes

No

Comments:

As noted above, we believe that the impact cases' rating should be incorporated in the relevant UoAs' profiles, and not in all UoAs' profiles.

With respect to environment, we believe that the weighting should be 5% institutional, 10% unit to reflect the nature of research delivery, if it is produced as a separate profile.

## 12. Proposed timetable for REF 2021

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

The timetable is achievable, but is relatively tight. We encourage the funding bodies to publish the guidance and panel criteria as early as possible in 2018, which is consistent with our response to Question 3a on the two elements being developed in parallel.

## 13. Other

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

In relation to the comments at paragraphs 63, 64 and 113 about equality and diversity, we suggest that it might be appropriate to require, as part of the environment statement, a profile of the outputs selected by gender, grade, FT/PT, BAME, disability. This may need to be at institutional rather than submission level, given the paucity and sensitivity of some elements of the data.

Some form of E&D profile might be used to moderate the volume of material (outputs and case studies) required. However, that suggests a level of sophistication in the data routinely available, and may be better considered for inclusion in future exercises.

We wonder whether the equality impact assessment should be part of the institutional Environment statement, rather than only being considered by the funding bodies and their advisory committee.

At a detailed level, the funding bodies may need to consider how reserve outputs for double-weighted outputs are handled: a reserve output would not necessarily be associated with the same member of staff.

The permitted use of multiple submissions should be expanded, and made consistent across all UoAs. The different approaches of the sub-panels in REF 2014 militated against institutions being able to represent their research as it is performed.

At present, there is a singular relationship between a submission and a UoA. Should an institution be permitted to make a submission to two (or more) UoAs, or request cross-referral of a defined group within a submission, not just be able to request that specific outputs are referred to a second UoA? Whilst this may create some added reviewing burden for the sub-panels, and add some logistical burden for the funding bodies, it could provide a better means of assessing multi- and inter-disciplinary groups, as their environment would be assessed from different disciplinary viewpoints, as well as specific outputs being so reviewed.

We have noted the possible detrimental effects (burden of selection and review, and negative effects on profiles) of an increased number of outputs being required from some institutions and submissions in comparison to REF 2014. An alternative approach might be to allow institutions to 'self-declare' a proportion of their eligible FTE as being 'not for assessment'. This figure would be used in presenting the profiles of each unit, but would not have an assessed rating against it. This would reduce the burden on the panels, as well as provide a means for institutions to reduce the perceived pressure on individuals.

There is a separate, and perhaps more interesting, effect of using the total population of staff on 'Teaching and Research' and 'Research-only' contracts to determine the volume of material (outputs and case studies). If the funding bodies wish to keep the volume of outputs and case studies to be about the same as in REF 2014, there could be a skewing of required numbers towards science subjects, because they tend to have proportionately more staff on Research-only contracts. The funding bodies may wish to model this, to understand whether the effects are material.

## 14. Contact details

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

Only responses received through the online form will be reviewed and included in our analysis.

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