

Annex A

Consultation questions and response form

1. Responses to the consultation should be made by completing the form below, and returning it by e-mail by **midday on Wednesday 16 December 2009**.
2. All responses should be e-mailed to ref@hefce.ac.uk. **In addition:**
 - a. Responses from institutions in Scotland should be **copied to** Pauline Jones, Scottish Funding Council, e-mail pjones@sfc.ac.uk.
 - b. Responses from institutions in Wales should be **copied to** Linda Tiller, Higher Education Funding Council for Wales, e-mail linda.tiller@hefcw.ac.uk.
 - c. Responses from institutions in Northern Ireland should be **copied to** the Department for Employment and Learning, e-mail research.branch@delni.gov.uk.
3. We will publish an analysis of responses to the consultation. Additionally, all responses may be disclosed on request, under the terms of the Freedom of Information Act. The Act gives a public right of access to any information held by a public authority, in this case HEFCE. This includes information provided in response to a consultation. We have a responsibility to decide whether any responses, including information about your identity, should be made public or treated as confidential. We can refuse to disclose information only in exceptional circumstances. This means responses to this consultation are unlikely to be treated as confidential except in very particular circumstances. Further information about the Act is available at www.informationcommissioner.gov.uk. Equivalent legislation exists in Scotland.

Respondent's details

| | |
|---|-------------------------------------|
| Are you responding: (Delete one) | On behalf of an organisation |
| Name of responding organisation/individual | University of Sussex |
| Type of organisation (Delete those that are not applicable) | Higher education institution |
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Consultation questions

(Boxes for responses can be expanded to the desired length.)

Consultation question 1: Do you agree with the proposed key features of the REF? If not, explain why.

We are generally supportive of the key features as an evolution of the RAE, and particularly note the primacy of expert review, informed where appropriate by metrics.

We note the inclusion of impact, which will be positive for a number of disciplines, in particular those which are practice-based, but we have some concerns about the practicality of assessment, and hence of the weighting.

We note the desire to provide useful management information to institutions, and need to be sure that the granularity provided by the proposed UoAs does so.

We strongly support the consistency of criteria and assessment across the UoAs, the lack of which in the past has caused concern and increased burden (e.g. because of special data requests).

We note the desire to increase the level of international assessment, but do not fully understand how international benchmarks will be provided, other than via bibliometric citation rates, which will only be applicable in some subject areas.

We support the continued use of a profile for the results.

Consultation question 2: What comments do you have on the proposed approach to assessing outputs? If you disagree with any of these proposals please explain why.

Comments are especially welcomed on the following proposals:

- that institutions should select research staff and outputs to be assessed
- for the categories of staff eligible for selection, and how they are defined
- for encouraging institutions to submit – and for assessing – all types of high-quality research outputs including applied and translational research
- for the use of citation information to inform the review of outputs in appropriate UOAs (including the range of appropriate UOAs, the type of citation information that should be provided to panels as outlined in Annex C, and the flexibility panels should have in using the information)

and on the following options:

- whether there should be a maximum of three or four outputs submitted per researcher
- whether certain types of output should be ‘double weighted’ and if so, how these could be defined.

We support the proposal for the selection of staff and of their outputs. However, we would note the internal burden that this entails, in particular relating to constructing and operating a code of conduct. It is to be hoped that the requirements in this respect will not change substantially from 2008, and hence institutions can reuse their previous codes, updated as required.

Inclusion of data on total eligible staff (Paras 30/31) may be interesting contextual information, but it should not play any part in the assessment or funding processes: institutions should not be assessed on staff or activity that has not been submitted. If that were desired, the Councils should require all eligible staff to be submitted.

We note the acknowledged need to define clearly the staff eligibility criteria, and we look forward to seeing these in a form that can (and will) equally be applied to the data collected by HESA.

We are disappointed that the Councils have not taken the opportunity to refine the definition of Category A staff, as this has been problematic for a number of Exercises. We suggest that only those staff whose primary employment function includes research should be eligible for submission. Those staff with teaching-only contracts should not be eligible as Category A for two reasons. The first is that making them eligible could, effectively, place inappropriate pressure on them as individuals to undertake research, in order to boost the percentage return. The second is that, as they are contracted and likely to be funded in total or in part by public funds, it is potentially a misuse of public funds for them to be undertaking research and subsequently being funded for it. If an institution wishes or expects an individual to undertake research, they should place them on an appropriate contract including research duties. Recognising, however, that a small number of teaching-only staff could be undertaking excellent research, we suggest that they are permitted to be returned as Category C staff, thus contributing to the quality profile. Taking this approach would make any statistics on percentage return of relevant staff much more meaningful, both at institutional and subject levels, and from an equal opportunities perspective. (There would be a separate, different question about the relative ratios between teaching-only staff and staff with teaching and research responsibilities.)

As has been noted to the Councils previously, it would be possible to define a checklist or set of criteria to determine eligibility, which would also deal with research staff, rather than use the historic, crude definition.

Para 33b proposes that Category C should be demonstrably focused in the submitted unit. We are not clear how this is to be achieved, and the statement does not seem to take the matter forward at a practical level. The paragraph also only refers to individuals employed by another organisation, with NHS and embedded unit staff particularly in mind, who are sometimes only relatively loosely connected to the submitting institution's own activity. We believe that there are strong arguments for the inclusion of some honorary or emeritus researchers, who are not employed by anyone, but who are actually undertaking research in the unit concerned. One might argue that these individuals have a clearer case for inclusion in terms of contribution, relevance and linkage than those employed elsewhere. We would also argue that it should be possible to submit relevant staff in archival and curatorial positions in libraries and museums. For each of these, the submission should be required to demonstrate the relevance and linkage, for example through the staff circumstances information.

Fractional-contract staff (para 34), even at low levels, can make a substantial contribution. Perhaps institutions should be required (and have space, e.g. in special circumstances) to justify inclusion of individuals at less than a certain percentage of full-time, in terms of the relationship of their work to others in the unit. Inadequate handling of this area could lead to the exclusion of a substantial proportion of practice-based researchers, and hence damage future translation into use. The Councils may wish to make explicit how staff holding two appointments (e.g. nine

months in one, three months in another on an on-going basis, where one may not be UK-based) should be handled.

Specific, clear, and consistent rules about the treatment of early career researchers should be included. Practices varied between panels in 2008, which was not helpful.

We do not support the reduction in the number of outputs from four to three (para 36). We believe that this would tend to have the effect of reducing the ability to discriminate levels of quality, and thus have knock-on effects in funding allocations. A reduction in outputs would not reduce the burden on institutions, who would still need to review and select from all outputs. A reduction might reduce the burden on the panels, in terms of the amount of review, but might equally encourage the inclusion of additional staff with slightly less full output portfolios, thus putting up the burden on panels. The Councils might wish to analyse the 2008 patterns of ranking of four outputs, to assess the possible effects.

There are some concerns in some subjects that changing the census period (again) will affect the ability to present quality outputs, especially in arts and humanities subjects, where the timescale for substantive outputs is generally longer than in the sciences.

We believe that double weighting of specific outputs is, on the surface, attractive. However, the practicalities of defining and operating a system for double-weighting are problematic, and the costs are likely to outweigh the benefits. For example, whether this would apply only to certain output types in specific UoAs, whether all such outputs of that type equally merit such treatment, and whether the institution or the panel determines that a given output should be double-weighted (hence potentially affecting the number of outputs submitted, or the relative weighting in the assessment, whichever option is chosen).

We have some concern with the inclusion of assessment of user significance (para 40). Does this mean that the assessment of the quality of outputs will depend to some degree on this, or is this meant to be an element of the assessment of impact? We do not believe that direct, non-academic user significance should be an absolute requirement for achievement of the highest levels of excellence.

The revised wording for the levels of output (para 41) is potentially helpful, but is likely to need extension in terms of the guidance provided to panels, to ensure consistency. However, the paragraph suggests that the revised definition is designed to increase discrimination at the top end of the scale. This could have the effect of giving the impression of a reduction of quality in the sector, in comparison to the 2008 results, and hence needs to be considered carefully.

Whilst there is a desire to improve the quality of the UK's research (para 15), there is also a need to produce an assessment profile across the UK, otherwise the funding mechanism becomes neutered.

Panels should be explicit in their criteria as to the level of use of citation information, and the ways in which they intend to use this (e.g. to inform judgements or as a cross-check only). The citation analyses in Annex C illustrate the ability and danger of over-analysis. Given the conclusions of the bibliometrics pilot, we advise that the amount of citation analysis provided to panels is restricted, to avoid the danger of over-reliance.

In procuring citation information (para 45b), the Councils should make that information and analysis routinely available to institutions, throughout the process (para 45f).

Verification of citation links is likely to be necessary, as indicated in para 48, but this also represents a burden to institutions, particularly as it will apply to more than just the selected publications (as institutions will wish to select from a number per individual, based on an informed decision). The Councils therefore need to provide a simple, robust, flexible mechanism as early as possible in the process. The Councils should also be clear how they will support institutions in identifying missing cites (as opposed to deleting incorrect cites). The Councils should not underestimate the time required for this, and the importance of having the process available early in the cycle, and with no additional costs to institutions (para 49).

The proposal makes no reference to the Councils' position on open access to the (journal-based) outputs of research. If the Councils wished to have a significant impact in this area, they could require that all submitted outputs of particular types are available through some form of open access mechanism. Whilst this would encourage standard publication through this route (in a similar vein to the mandates of the Wellcome Trust and the Research Councils), such a requirement would not rule out confidential reports, including those informing public policy, which the Government is known to be keen to have included in the assessment process. However, it would not be reasonable to introduce this requirement in this REF, as it would disadvantage a significant proportion of material already produced. We therefore suggest that it is considered during this cycle, to apply to the next REF. Additionally, we would note the potential cost of a switch to open access publication, which would fall substantially on institution's core funding.

Consultation question 3: What comments do you have on the proposed approach to assessing impact? If you disagree with any of these proposals please explain why.

Comments are especially welcomed on the following:

- how we propose to address the key challenges of time lags and attribution
- the type of evidence to be submitted, in the form of case studies and an impact statement supported by indicators (including comments on the initial template for case studies and menu of indicators at Annex D)
- the criteria for assessing impact and the definition of levels for the impact sub-profile
- the role of research users in assessing impact.

Para 53a proposes that impact should be built on excellent research. We will need to understand how this is to be demonstrated, especially in terms of the estimation of the quality of the underpinning research; if not careful, this would substantially increase the burden of the panels. Equally, if not undertaken with a suitable level of rigour, it will undermine the definitions and assessment of excellent research. It has been suggested that a threshold might apply. This still requires a valid assessment to be made, and use of simplistic approaches (e.g. by journal or publisher) would potentially undermine the exercise.

We have some concerns about the proposed time period for the underpinning research, as in a number of fields the time line typically exceeds that suggested. This can apply to the effects of

public policy as well as to achieving commercial outcomes (e.g. the time between the first studies on the effects of smoking and the legislation to ban smoking in public places in the UK was nearer to 50 years). Conversely, the submitting unit could look very different given the passage of time, and hence making the organisational connection may be problematic. We suggest the period should be 20 years.

We believe that the assessment of impact should be undertaken by a mix of academic and user experts. This would help to ensure the nuances and indirect influences that occur in translation from research result to application are properly recognised. In addition, we would note the tendency for the Councils to use users from “larger” organisations, whereas a significant proportion of universities’ interactions are with small organisations, of all sorts.

We also have some concerns about the appropriate indicators referenced in Para 55c and illustrated in Annex D. As impact is difficult to measure, the choice of meaningful indicators is problematic. We urge correspondence between these indicators and those being developed by the Research Councils, so that institutions only collect one set once. This may restrict the ability of panels to vary their specific requirements, as indicated in para 10 of Annex D.

With reference to the draft menu of indicators in Annex D, we have the following comments. Staff movement should include that between academia and public and third sector bodies, not only be limited to industry. Increased turnover or reduced costs for a business caused by a research intervention are notoriously hard to measure reliably. This, along with measures related to spin-out companies, introduce the problems of providing data about other organisations. We urge the Councils not to introduce an undue burden in this regard. Measures such as increased literacy and numeracy rates, reduced infection rates, lives saved, and reduced pollution are so broad and influenced by so many factors as to call into question the realistic ability of institutions to report reliably on such measures. Measures relating to public attitudes require sophisticated collection and analysis to be meaningful. Audience or attendance figures are crude measures of the effectiveness of the marketing of the event, and not of the impact of the event on the attendees, which would be a research project in itself. In general, the measures that might apply to the humanities and related disciplines are poorly formed.

We do not wish to pre-empt the outcome of the pilot exercise, but we have concerns about the case studies and the impact statement. For small submissions, a lot of weight is resting on one or two case studies, which cannot demonstrate the full range of potential impacts across the breadth of the submission (as defined in the submission’s environment statement). We suggest that there should be one case study per 5 FTE. Equally, the relative weight of the overall impact statement will potentially vary depending on the size of the submissions, and hence the number of case studies. We suggest that some ability for a submission to demonstrate in its impact statement relevant approaches to impact in each of, say, public policy, economic outcomes, and public engagement (as appropriate for the subject area) would be helpful.

With reference to para 68, what does “demonstrable contribution” entail? Commercial exploitation through a licence may or may not require continued involvement of the researcher or their institution, but it does require the research results to be identified, packaged and sold to the end customer. For many outputs, this will be the most efficient and effective manner of delivering economic benefit, and should not be devalued in the REF context. Equally, in other spheres, impact will occur through intermediaries, may be cumulative, and is rarely attributable to a single

piece of research, researcher, or research unit. It is misplaced to have an undue expectation of the researchers themselves, or their submitting unit, to be directly involved in the application of their research, per se. We await with interest for, and a little scepticism about the possibility of producing, clear, practical criteria for demonstrating research-driven contribution.

Given the potentially long lead time, and the desire to have a mobile research workforce, it would be unreasonable to require that the original researcher is still employed in the submitting unit.

Defining what 4* (and other levels of) impact actually looks like, and doing so in a comparable manner across all subject areas, is difficult. This will need to take into account subject variations, and styles of working (e.g. groups versus individuals). It is impossible to comment meaningfully on this until the pilot has reported, and we are concerned that there may be little opportunity to do so before the formal guidance is published.

Impact, of many forms, often occurs through intermediaries, may be cumulative, and is rarely attributable to a single piece of research, researcher or unit. The linear model of innovation and exploitation has long been discredited, so the Councils should be careful not to fall into that particular trap. Additionally, certain forms of research are valuable because they prevent particular outcomes, demonstrate particular lines of activity would be wasteful, or change attitudes. The evidence of the impact of this research may therefore be less demonstrable.

We urge that impact is treated equally, regardless of its geographical locus: it may be tempting to emphasise UK-based impact, but some outputs will be best used or exploited elsewhere, either because that is where the policy needs to apply (e.g. research for the developing world), or where the commercial outcome is greatest (which is then export earnings for the UK).

Research income from particular sources is suggested as an indicator of impact. This is not wholly correct, as it is more correctly a leading proxy indicator. Repeat business from a particular source may be a better indicator of value, but would be at a level not currently reported. The value of this as an indicator will also vary between the funder types proposed.

The demonstration of impact, both case studies and the overall statement, may be compromised if multiple organisational units are required to be presented in a single submission. Conversely, an impact may derive from research involving individuals in different subject areas, whether in one or several institutions.

Specific consideration needs to be given to emerging disciplines, and to new activity for a given institution, as neither is likely to have substantial historic research on which impact can be demonstrated. If this is not accommodated, and the weight of impact is relatively high, it could discourage innovative and developmental investment by institutions.

At a practical level, the necessary evidence may not have been subject to routine collection, and hence production of the case studies, and particularly the indicators, could be compromised.

Consultation question 4: Do you have any comments on the proposed approach to assessing research environment?

We note the view of the Councils (not expressed in the consultation document) that they would wish to see single submissions to each UoA. The effect of this would be the combination of a number of discrete organisational units. This would make the provision of a coherent statement about the environment problematic or impossible. Individual organisational units could, rightly, have different approaches to the same area of resourcing, support, or management. If the Councils wish to have single submissions, they will have to forego environmental statements of this type; or vice versa.

Para 79b makes reference to using information on PGR completions. Is the intention to collect actual completion data (i.e. number / percentage completing within a given time frame), or to continue to use degrees awarded, and to leave panels to surmise (possibly incorrectly) about the completion rates?

The bullets on engagement (para 79c) are lacking in focus, and hence will be open to misinterpretation, which will make them more difficult if not impossible to use by the panels. We suggest that a much narrower definition is used.

We very strongly support any moves to harmonise data collection for income and PGRs between the REF and HESA, which has been a substantial duplicative burden in the past. As well as ensuring that the data definitions and dates used are the same, we suggest that the same structures (i.e. UoAs) are used in HESA as in REF for research and related reporting, whilst retaining cost centres for teaching reporting. If desired, there could be a standard mapping between UoAs and cost centres. We support the requirement that only income and PGRs associated with submitted staff should be dropped. This may lead to a slight over-statement per FTE, but experience shows that this will be marginal. We recognise that changes to HESA structures take some time to effect, and hence elements of these changes should be agreed during this cycle, for implementation at the beginning of the next one.

Consultation question 5: Do you agree with our proposals for combining and weighting the output, impact and environment sub-profiles? If not please propose an alternative and explain why this is preferable.

We support the outcome being presented as an overall excellence profile, rather than as three separate outcomes (para 82).

We are unclear as to how greater recognition will be given for submissions showing excellence in all three areas (para 83c). That would seem to mean an adjustment to the combined profile (i.e. so that it was no longer actually an excellence profile representing proportions of activity), or a modification in the funding formula (i.e. a prioritisation factor). An adjustment to the profile might be to skew the profile where all three sub-profiles have more than a set percentage of 3* and 4*, i.e. a multi-threshold-based additional weighting. We await further details with interest.

We agree that the relative weightings should be the same across all subjects, but are concerned at the proposal for impact to be 25%, given the immaturity of the approach to collection and assessment of evidence in this area. Whilst we recognise the policy drivers behind its incorporation, we recommend that a lower weighting is applied in the first instance, with a figure closer to 15% being more appropriate. The balance should be split between outputs and environment, to give a weighting of 65% outputs, 15% impact, 20% environment.

We hope that all sub-profiles will be produced as profiles, rather than as single points, as was the case in some panels in 2008.

Consultation question 6: What comments do you have on the panel configuration proposed at Annex E? Where suggesting alternative options for specific UOAs, please provide the reasons for this.

We note the reduction in number of UoAs, and the reasoning for it. As noted in para 89, institutions have had and need to retain the discretion to submit individuals and their activity in appropriate packages / submissions. Given the increased breadth of the UoAs, institutions will need the freedom to define multiple submissions to individual UoAs, if they are to present coherent arguments. If the Councils wish to see only one submission per UoA, then they will have to relax the requirements on such submissions to show coherence, in particular in the environment statement, as such submissions are likely to be made up of a number of discrete environments.

The large UoA coverage will require a larger panel, of both full and associate members, as proposed. Whilst this may provide adequate coverage and flexibility of approach, it will also introduce potential inconsistencies in assessment, given the fluidity of the panel. Operating a number of informal sub-groups does not seem to be a robust method for achieving comparability of results, and risks damaging individual disciplines. We also note the use of the term Associate Member, in particular for user members. Whilst this may be to try to denote a lesser load, it could also have the effect of diminishing the role, and hence affect the Councils' ability to attract suitable individuals.

The Councils have noted disciplines' concerns about being appropriately assessed by their peers, and hence plan to have sufficiently large panels (i.e. the aggregation of the 2008 panels, one presumes). However, this is only part of the concern. Combining UoAs, and not permitting multiple, discipline-based submissions, raises concerns that the disciplines will lose their identity, because they will not have a separate rating. This will not just affect the individuals and their organisations, it will also affect the Councils' ability to assess the strength of a specific discipline, in particular where two or more disciplines that are on different research trajectories are combined.

Subject to the above concerns, we are broadly in favour of the UoA structure, and welcome the Psychology, Psychiatry and Neuroscience grouping within Panel A. However, the combination of Library and Information Management with Communication, Cultural and Media Studies seems to be a curious one.

Consultation question 7: Do you agree with the proposed approach to ensuring consistency between panels?

We do not wish to see additional data requirements from individual panels, over and above the standard menu. We also wish all working methods and decisions, e.g. double-weighting, use of citation data, to be explicit in the panel criteria.

Consultation question 8: Do you have any suggested additions or amendments to the list of nominating bodies? (If suggesting additional bodies, please provide their names and addresses and indicate how they are qualified to make nominations.)

No names to propose.

Consultation question 9: Do you agree that our proposed approach will ensure that interdisciplinary research is assessed on an equal footing with other types of research? Are there further measures we should consider to ensure that this is the case and that our approach is well understood?

The inclusion of impact will help to enable interdisciplinary research to demonstrate its relevance and value, if the normal academic quality profile were harder to determine. The broader panel structures may also help, as will user members. However, there will continue to be some areas of concern, given the fundamentally disciplinary nature of the academic enterprise, be that organisational and assessment structures, or publication environments.

Consultation question 10: Do you agree that our proposals for encouraging and supporting researcher mobility will have a positive effect; and are there other measures that should be taken within the REF to this end?

We recognise the attempts that the Councils are making, and currently have no further suggestions.

Consultation question 11: Are there any further ways in which we could improve the measures to promote equalities and diversity?

We recognise the importance of this area, and support any moves to simplify or standardise it. However, we would wish to ensure that the required approach remains practical and does not reduce institutions' flexibility or managerial autonomy.

Recent research indicates the gendered nature of labour division within HE, with women more often taking on pastoral and administrative roles and men research roles. This would suggest that the circumstances under which it may be permissible to submit a small number of outputs could be adjusted.

Consultation question 12: Do you have any comments about the proposed timetable?

As already noted, publication of the criteria, including all relevant elements and working methods, needs to happen as early as possible in 2011, as does suitable access to citation information, so that sound judgements can be made (and especially so that institutions can abide by their own codes of practice).

In general, we have some concerns about the timescale that the sector, including the Councils, now faces. We recognise the political pressures to retain the published timetable, but some relaxation may help to ensure stability, and provide some additional time to address concerns about impact.

Consultation question 13: Are there any further areas in which we could reduce burden, without compromising the robustness of the process?

It is not clear how the staff category simplification, as presented, will reduce burden (para 122b).

We strongly support alignment of REF and HESA (para 122c).

Does the phasing out of RAS (para 122d) have implications for the granularity of the funding formula, or will the Councils be hoping to use HESA data for these purposes? If so, we would wish to ensure that the definitions used are adequate, which they may not currently be.

Consultation question 14: Do you have any other comments on the proposals?