

This document contains our response to the consultation on the second Research Excellence Framework led by HEFCE. For queries, please contact Tom Frostick: [tom@unialliance.ac.uk](mailto:tom@unialliance.ac.uk).

## Overall approach

**Question 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?

University Alliance would welcome an overall continuity of approach with REF 2014 but believes that the proposals in the consultation represent a significant departure from the previous research assessment.

We are particularly concerned about the use of HESA data to determine which staff are submitted to the REF and the Units of Assessment to which researchers are allocated. We think that non-portability of outputs will be difficult to implement and we oppose institutional-level assessment of impact and environment for reasons outlined in this response.

Our chief recommendations to HEFCE and the other UK funding bodies are as follows and are informed by a two-month consultation with members.

- **Allocation of staff to Units of Assessment** (see response to Question 7) | The HESA cost centre proposal is unworkable. Institutions should continue to determine the UoA to which a researcher is allocated and present the information for audit on the REF census date.
- **Staff selection** (see Question 8) | Using HESA activity codes to determine which staff are returned to the REF is a blunt instrument. It misses the essential difference between staff whose contract *permits* them to do research and staff whose workplan set by their institution *requires* them to conduct a significant amount of research. Rather than having staff chosen automatically through HESA, institutions should instead identify individuals with “significant responsibility to undertake research” in accordance with the Stern Review and present the data for audit on the REF census date. This process should be underpinned by a strengthened Code of Practice (building on that which was used in REF 2014) and must be amenable to audit through random sampling and other methods.
- **Outputs** (see Question 9) | Setting a minimum of one output per FTE is only justifiable if a significance test is used for determining which staff should be returned to the REF. An upper limit of four outputs, instead of the proposed six, would result in the inclusion of outputs from a broader base of researchers and stop ‘superstars’ being disproportionately represented.
- **Portability** (see Question 10) | Non-portability of outputs is fine in principle but complicated to fulfil and will likely involve additional administrative burdens.
- **Institutional-level assessment** (see Question 38) | For lack of an agreed definition or fair way of comparing different types of institution, there should be no separate sub-profile for ‘institutional-level impact’. Impact should instead be wholly assessed at the UoA-level. Rather than creating a separate sub-profile for institutional-level environment, a new field should be introduced at the unit-level which enables participants to reference an institutional environment strategy with no separate weighting.

### Unit of Assessment structure

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

We support overall continuity in the Unit of Assessment structure. Substantial changes should be avoided in the interests of consistency and comparability.

### Expert panels

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

Yes

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

No

We would prefer to see appointments made earlier in the cycle so sub-panels can shape the panel criteria and ensure they are consistently applied.

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

Yes

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

We have no strong view.

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

Yes

**Question 6:** Please comment on any additions or amendments to the list of nominating bodies.

We have no comment.

### Staff

**Question 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?

The use of HESA cost centre data to allocate staff to Units of Assessment is unworkable as there is little affiliation between the two. It will lead to research centres having their staff and outputs scattered across multiple UoAs and is likely to discourage interdisciplinary research.

Recommendation:

- Institutions should continue to determine the Unit of Assessment to which a researcher is allocated and present the information for audit on the REF census date.

**Question 8:** What comments do you have on the proposed definition of 'research-active' staff?

Using HESA activity codes 'teaching/research' and 'research only' to determine which staff are submitted to the REF is highly problematic. Not everyone with research in their contract produces outputs that can be returned to the REF, or spends sufficient work time on research to be considered a significant researcher.

Practice-based disciplines such as education and allied health contain large numbers of staff who spend little time on research leading to outputs but whose contract status will make their inclusion in the REF compulsory under the HESA code proposal. The same is true of individuals working in scholarly development or on enterprise and business engagement. The staff in question are those whose expertise and authority to teach is critical to the ecosystem but who do not have a "significant responsibility to undertake research".

Implementing the HESA proposal will have unintended consequences. Institutions with lots of staff working in professional practice, scholarly development and enterprise will find that their producers of 3\*-4\* research are accompanied by many other individuals with few or no outputs. Since everyone will have to be submitted under the proposal, the quality profile of these institutions will appear to have become diluted, even if their absolute volume of 3\*-4\* publications is maintained or increases.

At the national level, REF panels will be asked to assess large quantities of 0-2\* research which would not have been submitted in the last exercise. The result will be overworked panels looking intensively at inappropriate outputs that institutions never wanted to submit and an obfuscated picture of research excellence.

Recommendation:

- Rather than having staff chosen automatically through HESA activity codes, institutions should identify individuals with "significant responsibility to undertake research" in accordance with the Stern Review and present the data for audit on the REF census date. The process should be underpinned by a strengthened Code of Practice (building on that which was used in REF 2014) and must be amenable to audit through random sampling and other methods.
- There should be wide discussion within institutions and at a sector level about the terms of the Code of Practice. Analysis of possible impacts on equality and diversity should be undertaken. The Code should guide institutions on matters to take account of when selecting staff including – for instance – their workplans. There should also be provision for an appeals process within institutions.
- The Code should avoid requiring formal agreement on status between institutions and individual staff members. Individual level agreements of this kind will be bureaucratic and burdensome, and could cause unnecessary tensions. REF 2014 demonstrated that a Code of Practice which is fair, balanced and transparent but not conditional on individual staff consent is workable. The same approach should be used in future research assessments.

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

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

An average of two outputs per FTE is reasonable provided there is flexibility in the number returned from each eligible staff member. It strikes the right balance between capturing an accurate representation of the research base while not significantly increasing the burden on institutions and REF panels. Taken with the significance test proposed in our response to Question 8 – which will reduce the number of staff submitted – maintaining an average of two will lower the burden on panels.

- b. The maximum number of outputs for each staff member?

The maximum number of outputs is less important than the minimum (see response to Question 9c). However, under a maximum limit of six outputs per FTE, 'superstar' researchers will be disproportionately represented in a UoA's research picture. This will give a less indicative view of the research landscape as a whole. A lower limit of four outputs per FTE will give less weighting to 'superstars' and result in the inclusion of research outputs from a broader base of researchers. If output portability is retained (owing to difficulties in implementing non-portability – see response to Question 10), the lower limit will reduce the incentive to poach 'superstars'.

- c. Setting a minimum requirement of one for each staff member?

Our strong view is that setting a minimum of one output per FTE is only justifiable if a test of significance is applied when determining which staff must be submitted – as set out in our answer to Question 8. If a minimum of one is enacted without this test in place, it will only worsen the distortions and problems we describe above. It cuts against basic logic to require outputs to be included from staff members who were never expected to produce any outputs for REF submission, regardless of their contract status.

Beyond this, we note that there are technical problems with both 'nought' and 'one' conditions on submission. In the case of a 'nought minimum', mechanisms will be required to prevent institutions with surplus 4\* and 3\* outputs from adding to their roster of staff on research contracts solely for the purpose of maximising their apparent volume. In the case of a 'one minimum', there will need to be flexibility for staff based on individual circumstances such as maternity leave and career breaks or fractional periods of service.

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

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

Identifying the point of acceptance for publication across all output types is not an insurmountable challenge but it will likely increase institutions' workload. Under current open

access requirements, it is not necessary to capture an acceptance date, so sourcing the information retrospectively for the purposes of the REF will prove burdensome. As the consultation acknowledges, some output types are easier to verify than others.

Date of publication is perhaps a clearer marker than point of acceptance but is not a particularly clear way of identifying who 'owns' the output. In some cases, there can be a prolonged period between acceptance and publication during which the author may move to another institution.

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

See answer to Question 10a.

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

It is possible that non-portability will have adverse effects on certain groups including researchers in fixed-term posts and those at the start of their career. Having outputs that are returnable to the REF by another institution can be important for career progression.

Non-portability could also incentivise staff to hold back research from publication which would be detrimental to progress within fields of research and to scientific discovery as a whole.

Except for allowing portability for some or all researchers, it is not obvious how these effects could be mitigated.

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

Sharing outputs proportionally will be complicated to administer.

**Question 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?

While a move towards more robust data collection is to be welcomed, we have some concern about the mandatory use of ORCID for REF 2021. The institutional resource required to implement the proposal will be significant.

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

We have observed that some institutions see value in the Category C classification, particularly in respect of NHS employees with research responsibilities at a university.

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

We would welcome clear guidance including examples of researchers that meet the definition in different disciplinary contexts. In general, a researcher that passes our proposed 'significance test' should be considered returnable to the REF.

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

We support the introduction of short statement outlining the connection of such staff to the submitted unit.

### Collaboration

**Question 15:** What are your comments on better supporting collaboration between academia and organisations beyond higher education in REF 2021?

We support this agenda but are not sure that additional metrics could be introduced in a robust and timely manner for REF 2021. University Alliance has written widely on good practice in collaboration. Our publications include:

- 'A clearer picture: A guide for arts and cultural organisations engaging with universities' (October 2016), with Arts Council England
- 'Creating innovative regions: The role of universities in local growth and productivity' (June 2016)
- 'Building healthy cities: The role of universities in the health ecosystem' (February 2016)

### Outputs

**Question 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?

Yes

**Question 17:** What are your comments on the assessment of interdisciplinary research in REF 2021?

Our members consider that the assessment of interdisciplinary research requires refinement but have differences of view on the proposals in the consultation. We note that efforts to improve the assessment of interdisciplinary research would be undermined by the use of HESA cost centres to allocate staff to UoAs (see response to Question 7).

**Question 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

We agree with the 'Metric Tide' Review that quantitative data should not supplant expert judgement but it seems reasonable for funding bodies to undertake further analysis on the appropriate use of metrics.

### Impact

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

Yes

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

We broadly support the recommendation but would welcome additional guidance on assessment criteria and acknowledgement of impact on teaching and learning.

**Question 21:** Do you agree with the proposal for the funding bodies and Research Councils UK to align their definitions of academic and wider impact? If yes, what comments do you have on the proposed definitions?

Yes

We support greater alignment of definitions with clear guidance.

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

We support the use of these criteria provided they are clearly defined and sensitive to contextual factors in different UoAs which may affect reach and significance. Further guidance from panels would be helpful.

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

Our members would welcome the following:

- NCCPE continuing to develop guidance which takes a more holistic view of research impact
- Panels providing examples of 4\* case studies
- Clarity on whether public engagement alone could be rated 4\* or whether it requires accompanying outcomes
- Guidance on the difference between basic dissemination of research and impactful public engagement.
- Highlighting general good practice as opposed to detailed guidance notes

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

Yes

Impact is primarily developed within UoAs and institutions, requiring both time and investment. Allowing impact to 'leave' with the researcher will reduce the incentive for institutions to invest in and sustain impact-generating activities.

**Question 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

The proposal will help to build a coherent picture of impact derived from research and the environment in which the research was undertaken.

**Question 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 the total number of case studies should not significantly exceed the number submitted to REF 2014. Our members reference alternative approaches in their institutional responses to the consultation including:

- Linking the number of case studies submitted to the size of individual submissions and capping the total number
- A minimum FTE threshold for requiring an impact case study
- Basing the number of required case studies on FTEs over past cycles as opposed to the current one
- Decoupling case studies from FTEs submitted and instead linking them to the number of outputs submitted
- Requiring a minimum proportion of submitted case studies to be interdisciplinary

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

Yes

**Question 28:** What comments do you have on the inclusion of further optional fields in the impact case study template (paragraph 97)?

We support the proposal provided it does not increase the burden on institutions.

**Question 29:** What comments do you have on the inclusion of examples of impact arising from research activity and bodies of work as well as from specific research outputs?

We support the proposal on the basis that it will capture a greater range of impacts. Guidance would be helpful.

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

Yes

**Question 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?

Our members have differing views on this suggestion.

**Question 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:



- a. The suggestion to provide audit evidence to the panels?

The proposal will increase the burden on institutions for no clear gain. Audit evidence should be requested by panels when required.

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

The use of quantitative data is more appropriate in some disciplinary contexts than others.

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

Our members would welcome additional guidance.

**Question 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 support the ability to submit examples of impact to REF 2021 that were previously returned in REF 2014.

## Environment

**Question 34a:** Do you agree with the proposal to improve the structure of the environment template and introduce more quantitative data into this aspect of the assessment?

Yes

Quantitative data should be handled with caution but we accept that its appropriate use can helpfully support the environment narrative. Examples of data that could give valuable insight to panels are listed in our response to Question 34b.

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

Data could include:

- Investment in PhDs including multi-institution training partnerships (e.g. University Alliance Doctoral Training Alliance)
- Equality and diversity recognition (e.g. Athena SWAN)
- Concordats (e.g. research integrity)
- Higher Education Business and Community Interaction Survey or HEBCIS

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

The environment template could ask institutions to reference collaborations beyond higher education. NCCPE and others have developed resources which can help institutions assess the effectiveness of their support for engagement outside academia.

**Question 36:** Do you agree with the proposals for awarding additional credit to units for open access?

No

The proposals will increase the burden of REF and unfairly advantage institutions that have received block grants to support the development of open access policy.

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

The REF is not necessarily an appropriate mechanism for incentivising units to share and manage research data more effectively. Current practices can be captured as part of the environment narrative.

### Institutional-level assessment

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

We expressed concern about institutional-level assessment in our response to Lord Stern's consultation on the basis that it could mask pockets of excellence and create a 'size matters' scenario where institutions with the biggest stories to tell have an unjustified advantage. Consistent with this position, we oppose the introduction of separate sub-profiles for institutional-level impact and environment.

Institutional-level impact lacks an agreed definition and it is not clear how or whether comparisons should be drawn between different types and sizes of institution. Conceptually, it is easier to understand institutional impact as the aggregate of an institution's research impact but this is already assessable at the unit-level.

We can see merit in a broader view of research environment provided it is used to determine whether an institution's facilities are fit for purpose rather than better than those of another. As with institutional-level impact, inviting such comparisons is an unjust way of assessing different types of institution.

Recommendations:

- Impact should be wholly assessed at the UoA-level.
- Rather than creating a separate sub-profile for institutional-level environment, a new field should be introduced at the UoA-level which enables participants to reference an institutional environment strategy. Institutions should be assessed on the coherence of their unit-level environment statements in relation to a broader strategic statement that carries no separate weighting.

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

It is not easy to see how a pilot will address the concerns in our response to Question 38.

### Outcomes and weighting

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

We support a profile split of 65% for outputs, 20% for impact and 15% for environment.

**Question 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

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

No

There should be no separate sub-profiles for institutional-level impact and environment. These should be assessed at the UoA-level with a weighting of 20% for impact and 15% for environment.

### Proposed timetable for REF 2021

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

None

### Other comments

**Question 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?

The consultation has highlighted the need for an extra activity code in the HESA staff collection for individuals working on enterprise and professional practice alongside teaching and/or research.