University of St Andrews response to REF 2014 'Consultation on draft panel criteria and working methods' 5 October 2011

Consultation questions

1. Overall draft panel criteria and working methods

a. The generic and four main panel statements achieve an appropriate balance between consistency across the exercise and allowing for justifiable differences between the four main panels.

Strongly Agree	Agree	Neither agree or disagree	<u>Disagree</u>	Strongly disagree
<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>

b. Are there particular aspects of the criteria and working methods that should be more consistent across all the main panels? Are there differences between the disciplines that justify further differentiation between the main panel criteria? Where referring to particular main panels, please state which one(s).

Overall, the documentation provided thus far for the REF is helpful. We appreciate that there are differences between research disciplines, especially between sciences and arts & humanities that not only prohibit total consistency between panels and/or units of assessment but where consistency can be detrimental to the fair assessment of certain disciplines. Nevertheless, it is our view that some areas would benefit from more consistency, while others may justify further differentiation, which we have outlined below.

Boundaries of UOAs: We seek reassurance that, where research is interdisciplinary and takes place at the interface between two UOAs, the research will not be marginalised or disadvantaged. For example, the inclusion of Solar and Magnetospheric Theory within a submission to the REF could be made to either UOA 9, Physics, or to UOA 10, Mathematical Sciences, and should not be viewed as peripheral to either UOA just because it is positioned at the interface of both these UOAs. This applies equally to other interface disciplines, such as the Statistical Ecology and Algebra/Theoretical Computer Science interface. This is especially important if cross referral is likely to be carried out only in exceptional circumstances (Panels A, B and C). We suggest that Panels B and C should consider including the following approach taken in Panel A; para 19, which states that "Institutions will not be penalised if submissions contain work that overlaps UOA boundaries."

In addition, the boundaries on some UOAs may have been set too rigidly. For example, the REF brings modern languages and linguistics together in UOA 28; however, we are concerned that this UOA may only include research on the languages of Europe and Latin America. Our interpretation of the current guidance is that language research on other modern languages (such as Arabic and Chinese) has been excluded from UOA 28 by this boundary definition and requires clarification. Where boundaries are unclear, understanding how clarification on specific boundary type issues, such as the issue above, might be obtained is requested.

Assessment criteria: outputs

Output criteria: Output criteria (para. 32a): Further clarification is required of the statement "with reference to international research quality standards", as this implies that there is an objective standard across all disciplines. Panel B (para. 36) has a very clear listing of characteristics defining the different star ratings. We would welcome a similar level of detail in the generic statement or in the criteria for the other panels.

Consistency on co-authored outputs: We would like to see greater consistency between Panels A and B with regards to the material contribution of co-authored papers. Under current rules, the same co-authored collaborative output submitted separately by different institutions to, for example, Panels A and B will be assessed against different criteria and with differing levels of information. For example, UOA 5, Biological Science (Panel A), requires explicit material contribution of authors to be established; however, UOA 8, Chemistry (Panel B), has no such requirement. This could lead to real inconsistencies in the assessment of outputs based on a necessarily 'subjective' judgement on 'material contribution' of authors. We are concerned that the assessment of author contribution where requested in Panels A and B will be subjective; Panel A will determine that the contribution of the author to the research is 'material'; Panel B, UOA9, Physics are seeking a 'significant' contribution on outputs with five or more co-authors. If these panels retain the above approaches, institutions will require further guidance on what panels consider to be 'material' or 'significant' contributions. We suggest that only outputs with greater than 10 authors/contributors should carry a **requirement** to describe author contribution. This solution could apply across all sub-panels in Panels A and B. In addition to improving consistency across panels, it would reduce the burden on panels and institutions. The word count for this textual information should be the same for all relevant sub-panels. For outputs where author contribution requires to be justified, we do not support the approach of 'full credit or unclassified' outcomes. We would support panel discretion to apply a graded approach when considering author contribution rather than allowing the situation where an output may be rated either 4* quality or 0* rating depending on the judgement on author contribution.

Consistency of double-weighting: More clarity and consistency is requested across panels as to what constitutes double-weighted outputs. It is important that this is unambiguous at the time of submission, and examples of what will be acceptable would be welcome. In terms of consistency, all panels offering a double-weighted output option should also put in place a reserve output option.

Significant material published prior to 1 Jan 2008: The Assessment framework and guidance on submissions, para. 105(b) states that outputs must be "First brought into the public domain during the publication period, 1 January 2008 to 31 December 2013" In addition, para. 113 states that "An output published during the REF publication period that includes significant material in common with an output published prior to 1 January 2008 is eligible if it incorporates significant new material". This is an area where panels have adopted significantly different approaches, and the guidance should be clarified fully in order to not cause concern and confusion. In many disciplines, there is a culture of allowing early access to archival versions of research prior to refereeing and/or formal publication, and the REF should not be allowed to inhibit communication of such research findings.

'Published' versus 'Publicly available': We would welcome greater clarity in the Panel criteria as to what is meant by "First brought into the public domain" in the Assessment framework and guidance on submissions, para. 105b statement (quoted above). For example, does this apply to material made available on an individual's or an institution's web site or to papers that were in press and available as such on journal websites in 2007, but then published with a 2008 publication date? Ambiguity of this key phrase will cause problems for some disciplines that have long publication time lags. In addition, clarity is requested whether, for

example, institutional repositories will be included as a publishing medium. We suggest that all panels should adopt the approach that if the output was **submitted to RAE2008**, then sub-panels will assess only the distinct content, including the additional research or new insights, reported in the output submitted to the REF. However, panels should allow submission of outputs which may have appeared in the public domain in another form prior to 1st January 2008, and institutions should not be required to submit clarification on earlier versions or content as this will cause extra burden both to institutions and panels. If the assessment criteria remain unchanged, then this may cause discrimination against some subject disciplines where there is a considerable publication time lag, for example UOA18, Economics and Econometrics. In many disciplines, there is a culture of allowing early access to archival versions of research prior to formal publication, and the REF should not be allowed to inhibit communication of such research findings.

Additional information on research outputs: There should be greater consistency with regard to the word count of textual information as additional information (both contribution and non-textual output). We are uncomfortable with the possibility that routes to provide objective supporting evidence will be cut off if word summaries are not allowed in some submissions, particularly for papers that may be multi-disciplinary in nature and especially as cross referrals are being kept at a minimum.

Assessment criteria: impact

Number of impact case studies: Although not strictly an issue for the generic statement, the *Assessment framework and guidance on submissions*, para. 156 (Table 1) states the number of case studies that will be required per submitted FTEs. In our view, this algorithm is biased against small submissions. The production and gathering of evidence for 2 case studies, for small submissions, will place a disproportionate burden upon them. We request that submissions with **7 or less FTEs** be permitted to submit **one impact case study** without penalty.

Underpinning research: We suggest that more flexibility in the start of the period for the underpinning research should be extended for all Panel A sub-panels and also for Panel B UOA 9 back to 1 January 1988. The rationale for this request is that it can take up to 16 years to take a new drug to market and that realising the benefits of research in physics can also take up to 20 years. This request is not unprecedented in that one sub-panel (UOA 16: Architecture, Built Environment and Planning, Panel C) is already proposing to go back to 1988; and, therefore, Panel A sub-panels and UOA 9 should also be allowed flexibility on this important point.

Guidance on impact: In terms of consistency, Panel C, relative to other panels, has provided significantly less guidance on impact in terms of the range of impacts, examples of impact and evidence of impact. We request an improvement in the level of the provision in terms of information supporting impact from Panel C.

Assessment criteria: environment

In terms of consistency, the omission of any indication of the relative weightings of the components involved in the assessment of environment by Panel C is striking. All other panels have provided a breakdown, and we request that Panel C also provides this information.

Working methods (outputs):

It would be helpful to know the working methods individual sub-panels plan to employ with regards to the reading of outputs. Will all outputs be read or will there be some form of sampling? This is presumably another area where consistency is required.

2. <u>Individual staff circumstances</u>

a. The proposals for determining the number of outputs that may be reduced without penalty, for staff with a range of individual circumstances, are appropriate (Part 1, Tables 2 and 3).

Strongly Agree	Agree	Neither agree or disagree	Disagree	Strongly disagree
С	C	C	C	•

- b. <u>Please comment on these proposals. Respondents are also invited to comment specifically on:</u>
 - whether Tables 2 and 3 are set at appropriate levels
 - the proposed options for taking account of pregnancy and maternity (Part 1, paragraph
 62)
 - whether a consistent approach across the exercise is appropriate, or whether there are any specific differences in the nature of research that justify differences in the approach between UOAs or main panels.

If commenting in respect of particular panels or disciplines, please state which.

We do not believe that the overall approach taken by the REF to staff with individual circumstances is an improvement on the processes used for RAE2008. The current tariffs for 'other clearly defined circumstances' and the arrangements for complex circumstances do not meet with our approval. In particular, we are concerned about the treatment of **staff with periods of maternity leave** and that the inclusion of an EDAP judgement for complex circumstances may cause more anxiety to the very staff this system is designed to protect. **Institutions will, by necessity, be required to 'make a case' and thereby provide sufficient information that may be of a sensitive nature to an external body, EDAP.**

Institutions are required to submit Codes of Practice, regarding selection of staff to REF, by 31 July 2012. The timetable for this is short in that it is likely that institutions will have insufficient information from EDAP as to how the declaration and judgement of complex circumstances will work. Prior to implementing our Codes, staff involved in making REF submission recommendations and decisions will require informed training. In addition, institutions need to be ready as soon as possible to help with advice to staff with complex circumstances. The current proposals are too complex and may in practice disadvantage staff with individual mitigating circumstances.

Other clearly defined circumstances: The period of absence required from work in order to allow for reduction of **one output** is currently set too high. We would support a change that allowed a reduction of one output, without penalty, where the total absence from work is between 12 - 27.99 months.

Maternity: Maternity leave should be treated differently to other clearly defined circumstances because: (1) the criteria for output reduction, as it stands, could be viewed as discriminatory towards women of child-bearing age; (2) becoming a parent has a longer period of disruption to a person's life than the time defined by maternity leave; and (3) the majority of female academics cannot take the maximum

amount of maternity leave due to financial reasons, since much of it is on reduced pay or unpaid.

Therefore, we **strongly support** the approach described para. 62 that staff who had periods of **maternity leave** during the assessment period should be allowed to reduce the number of outputs by one for each discrete period of maternity leave. The documentation does not make any mention of consideration for paternity leave and, given the recent introduction of Additional Paternity Leave, this should also be considered.

This is an extremely important area given that HEI's have a statutory obligation to embed equality as set out in the EHRC Equality Act Code of Practice: Higher Education. As a result, HEIs will need clear and legally compliant guidance that the application of such practices does not result in indirect discrimination for HEIs as employers. Further, it is important that processes such as REF do not have a negative impact on the careers of those coming back into the workplace after a period of maternity leave or illness. The current proposals do not support this view.

Complex circumstances: As addressed above, we have serious concerns over the proposed processes involved in addressing staff with complex circumstances. If, as it appears, EDAP will be making a judgement on complex circumstances with no mechanism for institutions to obtain feedback, appeal judgements or provide reserve outputs, then we are worried about the possible effects of this process on staff morale. One possible option would be to have advanced rulings on complex circumstances provided to institutions. Guidance will be required very soon on exactly how institutions can provide sufficient detail on complex circumstances without divulging individuals' confidential information. We suggest that the practical mechanisms involved in the process of handling complex circumstances for the REF requires further urgent consideration.

Publication rate: There are real differences in the publication cultures and, thus, the publication rates in, for example, (1) the arts, humanities and social sciences versus (2) the sciences. We are concerned that research evaluation exercises modify the nature and publication of research in some subject areas. Arts & humanities tend to have fewer 'outputs' than the sciences and, therefore, must select outputs for submissions for REF from a necessarily smaller volume of available outputs in the period. This may, in turn, have disproportionately negative effects on researchers in these disciplines, especially where individual circumstances apply. In addition, if particular output types are valued over others by specific panels, for example, monographs over articles, then this could have a discriminatory effect on individuals who have had reduced time available for research in the period. We suggest that some consideration of these issues are reflected in allowances, particularly for Panels C and D.

Part 2A: Main panel A criteria and working methods

3.

4.

5.

Main panel crite	Main panel criteria and working methods							
a. The main p	oanel statement a	chieves an appro	priate balance be	tween consistenc	<u>y and</u>			
allowing for discip	oline-based differe	ences between the	e sub-panels.					
Strongly Agree	Strongly Agree Agree Neither agree or disagree Disagree Strongly disagree							
C	C	•	C	C				
<u></u>	een the sub-panel		-	wing for discipline ate the UOA(s) on				
No issues								
·	A descriptor and disciplines cover	I boundary stated ed by the UOAs?	ments provide a c Please include a	clear and appropri				
No issues								
UOAs.	b. Please comment on the main panel's criteria in relation to multiple submissions in its UOAs.							
No issues	No issues							
Assessment criteria: outputs (Section 2) a. Overall, the main panel criteria relating to outputs are clear and appropriate.								
Strongly Agree	Agree	Neither agree or disagree	Disagree	Strongly disagree				
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b. <u>Please comment on the criteria in Section 2, in particular on where further clarification is required or where refinements could be made.</u>

Co-authored outputs:

Para. 37. We would like to see greater consistency between Panels A and B with regards to the material contribution of co-authored papers. Under current rules, the

same co-authored collaborative output submitted separately by different institutions to, for example, Panels A and B will be assessed against different criteria and with differing levels of information. For example, UOA 5: Biological Science (Panel A), requires explicit material contribution of authors to be established; however, UOA 8: Chemistry (Panel B), has no such requirement. We suggest that outputs, submitted to any panel, with greater than 10 authors/contributors should carry a **requirement** to describe author contribution. In addition to improving consistency across panels, this suggestion would also reduce the burden on panels and institutions. The word count for this textual information should be the same for all relevant sub-panels. For outputs where author contribution requires to be justified, we do not support the approach of 'full credit or unclassified' outcomes. We would support panel discretion to apply a graded approach when considering author contribution rather than allowing the situation where an output may be rated either 4* quality or 0* rating depending on the judgement on author contribution.

Significant material published prior to 1 January 2008:

Para. 49. Assessing 'original content': Please clarify the seeming contradiction between the wording, "where the output includes significant material published prior to 1 January 2008, all sub-panels welcome details of how far the earlier work was revised to incorporate new material in REF2 ('guidance on submissions', paragraph 127c)." and the wording in *Assessment framework and guidance on submissions* (paragraph 113a) "if the previously published output was submitted to the 2008 RAE, the panel will assess only the distinct content of the output submitted to the REF".

We suggest that all panels should adopt the approach that if the output was submitted to RAE2008, then sub-panels will assess only the distinct content, including the additional research or new insights, reported in the output submitted to the REF. However, panels should allow submission of outputs which may have appeared in the public domain in another form prior to 1st January 2008, and institutions should not be required to submit clarification on earlier versions or content as this will cause extra burden both to institutions and panels.

6. Assessment criteria: impact (Section 3)

a. Overall, the main panel's criteria relating to impact are appropriate and helpful to institutions in preparing submissions.

Strongly Agree	Agree	Neither agree or disagree	Disagree	Strongly disagree
C	C	©	C	C

b. <u>Please comment on the criteria in Section 3, in particular on where further clarification is</u> required or where refinements could be made.

We request that the start of the period for the underpinning research should be extended for Panel A back to **1 January 1988**. The rationale for this request is that it can take 16 years to take a new drug to market; therefore, to allow for this time lag, we would support allowing all UOAs in Panel A to be given the flexibility to include underpinning research back to 1988. This request is not unprecedented since sub-panel UOA 16 (Architecture, Built Environment and Planning, Panel C) is already proposing to go back to 1988; and, therefore, Panel A sub-panels should also be allowed this important exception.

7. Assessment criteria: environment (Section 4)

		Neither agree		Stronaly
Strongly Agree	Agree	rteitrier agree	Disagree	<u>Otrongry</u>
Ottorigiy / tgree	<u> </u>		Disagree	Para a sa

Overall, the main panel criteria relating to environment are clear and appropriate.

Strongly Agree	<u>Agree</u>	Neither agree or disagree	<u>Disagree</u>	Strongly disagree
<u> </u>	<u> </u>	<u>©</u>	0	<u> </u>

b.	Please comment on the criteria in Section	n 4,	in	particular	on	where	further	clarification	n is
requir	ed or where refinements could be made.								

No issues		

8. **Working methods (Section 5)**

a.

Overall, the working methods of the main panel and its sub-panels are clear and a. appropriate.

Strongly Agree	Agree	Neither agree or disagree	Disagree	Strongly disagree
C	C	•	C	C

b.	Please comment on the	working	methods,	in	particular	on	where	further	clarification	ı is
require	ed or where refinements	could be	e made.							

No issues		

Part 2B: Main panel B criteria and working methods

3. Main panel criteria and working methods

a. The main panel statement achieves an appropriate balance between consistency and allowing for discipline-based differences between the sub-panels.

Strongly Agree	<u>Agree</u>	Neither agree or disagree	<u>Disagree</u>	Strongly disagree
<u>c</u>	<u> </u>	<u> </u>	<u> </u>	<u></u>

b. Please comment on the balance between consistency and allowing for discipline-based differences between the sub-panels within this main panel. Please state the UOA(s) on which you are commenting.

There are two areas where we have concerns:

(1) Different approaches taken to **co-authors** within this panel. For submissions to UOA 8, Chemistry, there is no need to explain author contribution; however, UOA 9, Physics, requires demonstration of 'significant' contribution where there are 5 or more authors.

We suggest that only outputs with **greater than 10** authors/contributors should carry a **requirement** to describe author contribution. We suggest this solution could apply across all sub-panels in Panels A and B. In addition to improving consistency across panels, this suggestion would also reduce burden on panels and institutions. The word count for this textual information should be the same for all relevant subpanels.

For outputs where author contribution requires to be justified, we do not support the approach of 'full credit or unclassified' outcomes. We would support panel discretion to apply a graded approach when considering author contribution rather than allowing the situation where an output may be rated either 4* quality or 0* rating depending on the judgement on author contribution.

(2) Panel B should allow the start of the period for the underpinning research for impact case studies to be extended for UOA 9, Physics, back to 1 January 1988. Our participation in the pilot exercise has emphasised that this is a necessary allowance for this sub-panel.

4. Submissions and units of assessment (Section 1)

a. Do the **UOA descriptor and boundary** statements provide a clear and appropriate description of the disciplines covered by the UOAs? Please include any suggestions for refining the descriptors and state which UOA(s) you are commenting on.

We seek assurance that, where research is interdisciplinary and takes place at the interface between two UOAs, the research will not be marginalised or disadvantaged. For example, the inclusion of Solar and Magnetospheric Theory within a submission to the REF could be made to either UOA 9, Physics, or to UOA 10, Mathematical Sciences, and should not be viewed as peripheral to either UOA just because it is positioned at the interface of both these UOAs. This applies equally to other interface disciplines, such as Statistical Ecology and Algebra/ Theoretical Computer Science. This is especially important if cross referral is likely to be carried out only in exceptional circumstances. We suggest that Panel B considers including the following approach taken in Panel A, para. 19: "Institutions will not be penalised if submissions contain work that overlaps UOA boundaries." In

addition, it should be clearer exactly how Panel B will ensure that multi-disciplinary, non-core research will be adequately assessed.

b.	Please (comment	on the main	<u>panel's</u>	criteria i	n relation	to multi	<u>ple subm</u>	<u>issions</u>	in its
<u>UOAs</u>	<u>.</u>									

No issues

5. Assessment criteria: outputs (Section 2)

a. Overall, the main panel criteria relating to outputs are clear and appropriate.

Strongly Agree	<u>Agree</u>	Neither agree or disagree	<u>Disagree</u>	Strongly disagree
<u>c</u>	<u> </u>	<u> </u>	<u> </u>	<u>©</u>

b. <u>Please comment on the criteria in Section 2, in particular on where further clarification is required or where refinements could be made.</u>

Co-authored outputs:

UOA 9 – Physics, Para 44: Physics has been singled out regarding multi-authorship rules designed to account for the 'Big Science' aspects of very large collaborations. However, this type of collaborative science is not restricted just to Physics. There should, therefore, be consistency on the assessment of all papers with very large collaborations, regardless of their panel or sub-panel.

We agree with setting boundaries in these cases; but, it is important that boundaries used to define 'Big Science' papers be considered carefully. If the boundary (for Physics) is set at five or more co-authors, it includes the vast majority of all experimental physics, even from manifestly small science disciplines. Papers that would be unquestioned by, for example, a chemistry panel, would then run the risk of being unclassified by the physics panel.

We suggest that only outputs with **greater than 10** authors/contributors should carry a **requirement** to describe author contribution. We suggest this solution could apply across all sub-panels in Panels A and B. In addition to improving consistency across panels, this suggestion would also reduce burden on panels and institutions. For outputs where author contribution requires to be justified, we do not support the approach of 'full credit or unclassified' outcomes. We would support panel discretion to apply a graded approach when considering author contribution rather than allowing the situation where an output may be rated either 4* quality or 0* rating depending on a subjective judgement on author 'significant' contribution. If Panel B retains the above approach, institutions will require further guidance on what the panel considers is a 'significant' contribution.

Additional information:

UOA 9— Physics, Para. 55: "Information provided must not include citation data." We believe that institutions should be allowed to include objective information about the citation record of the submitted papers as part of additional factual information. This is particularly important since the information to be supplied automatically to panels will come from Scopus, a database in which physicists have limited confidence. We believe that providing citation counts from the database most appropriate to the sub-field will give panel members complementary information that would be useful to them, and reduce their evaluation workload.

Outputs with material in common:

Para. 57: Assessing 'original content'. Please clarify the seeming contradiction between the wording in para. 57, "Guidance on submissions' (paragraph 113) sets out the general arrangements for the submission of research outputs that include significant material in common with an output published prior to the beginning of the REF publication period, 1 January 2008. Panels will apply the general principle that where such outputs are submitted to the REF, the panels will assess the original content or new insights reported in the output." and the wording in 'Guidance on submissions' (paragraph 113a) "if the previously published output was submitted to the 2008 RAE, the panel will assess only the distinct content of the output submitted to the REF".

For UOA 9, Physics, and UOA 10, Mathematical Sciences, we are extremely concerned that papers put in the arXiV in 2007 but not published until 2008 may be ruled as ineligible for the REF. Archive submission does not, in our view, constitute publication. The papers at first posting are unrefereed and not regarded as prepublished by any reputable journal. Almost no arXiV-posted but unpublished work was submitted to RAE 2008, so if this rule is maintained, work will be effectively barred from either an RAE or REF simply because of a fluke of its date of publication. To do so would amount to unfair discrimination against the field of physics, penalising it for playing a leading role in establishing these on-line fora.

We suggest that all panels should adopt the approach that if the output was submitted to RAE2008, then sub-panels will assess only the distinct content, including the additional research or new insights, reported in the output submitted to the REF. However, panels should allow submission of outputs which may have appeared in the public domain in another form prior to 1st January 2008, and institutions should not be required to submit clarification on earlier versions or content as this will cause extra burden both to institutions and panels. In addition, if the assessment criteria are unchanged, this may cause discrimination against Panel B sub-panels where there is a culture of allowing early access to archival versions of research prior to refereeing and/or formal publication. The REF should not be allowed to inhibit communication of such research findings.

6. Assessment criteria: impact (Section 3)

a. Overall, the main panel's criteria relating to impact are appropriate and helpful to institutions in preparing submissions.

Strongly Agree	Agree	Neither agree or disagree	Disagree	Strongly disagree
С	C	C	©	C

b. <u>Please comment on the criteria in Section 3, in particular on where further clarification is</u> required or where refinements could be made.

Panels A (para. 70-72) and C (para. 99-101) give definitions of the terms "reach" and "significance", as well as the geographical implications of these terms. It is surely important to have similarly detailed clarifications for Panel B. We would support that the start of the period for the **underpinning research** should be extended for Panel B UOA 9, Physics, back to **1 January 1988**. The rationale for this request is based on our experience with the REF Impact Pilot, where it was clear that it would be beneficial to the discipline, as a whole, to allow inclusion of underpinning research further back than 15 years. This request is not an

unprecedented suggestion in that one sub-panel (UOA 16: Architecture, Built Environment and Planning, Panel C) is already proposing to go back to 1988; and, therefore, UOA 9 should also be allowed this important exception.

	7.	Assessment criteria: environmen	t (Section 4)
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a. Overall, the main panel criteria relating to environment are clear and appropriate.

Strongly Agree	<u>Agree</u>	Neither agree or disagree	<u>Disagree</u>	Strongly disagree
<u>C</u>	<u> </u>	<u> </u>	<u> </u>	<u>c</u>

b. <u>Please comment on the criteria in Section 4, in particular on where further clarification is required or where refinements could be made.</u>

UOA 9 – Physics, Para. 91d: The number of research technicians, experimental officers and scientific officers is not a good indicator of a physics environment. For many branches of physics, this is a form of double counting, since costs for such positions are covered on EPSRC grants. We suggest that this extra data requirement should be removed from the REF.

8. Working methods (Section 5)

a. Overall, the working methods of the main panel and its sub-panels are clear and appropriate.

Strongly Agree	<u>Agree</u>	Neither agree or disagree	<u>Disagree</u>	Strongly disagree
<u></u>	<u> </u>	<u>©</u>	<u> </u>	<u> </u>

b.	Please comment on the	working	methods,	in	particular	on	where	further	clarification	n is
requir	ed or where refinements	could be	e made.							

No issues

Part 2C: Main panel C criteria and working methods

3.	Main pane	I criteria and	working	methods

a. The main panel statement achieves an appropriate balance between consistency and allowing for discipline-based differences between the sub-panels.

Strongly Agree	Agree	Neither agree or disagree	<u>Disagree</u>	Strongly disagree
<u></u>	<u> </u>	<u>•</u>	<u> </u>	<u></u>

b.	Please comment on the balance between consistency and allowing for discipline-	based
differe	ences between the sub-panels within this main panel. Please state the UOA(s) on	which
you a	re commenting.	

No issues			

4. Submissions and units of assessment (Section 1)

a. Do the **UOA descriptor and boundary** statements provide a clear and appropriate description of the disciplines covered by the UOAs? Please include any suggestions for refining the descriptors and state which UOA(s) you are commenting on.

No issues		

b. <u>Please comment on the main panel's criteria in relation to **multiple submissions** in its UOAs.</u>

No issues

5. Assessment criteria: outputs (Section 2)

a. Overall, the main panel criteria relating to outputs are clear and appropriate.

Strongly Agree	Agree_	Neither agree or disagree	<u>Disagree</u>	Strongly disagree
<u> </u>	<u>C</u>	<u>c</u>	<u> </u>	<u>•</u>

b. <u>Please comment on the criteria in Section 2, in particular on where further clarification is</u> required or where refinements could be made.

Criteria and level definitions:

Para. 39. The descriptors of quality level definitions employed by Panel C are less explicit than those provided by, for example, Panel B. We would welcome more guidance in this area.

Outputs with significant material in common:

Para. 43. "As stated in 'guidance on submissions' (paragraph 113), where a listed research output includes significant material that was previously published before 1 January 2008, the sub-panels may take the view that not all of the work reported in the listed output should be considered as having been issued within the publication period. However, the wording in 'Guidance on submissions' (paragraph 113a) states that "if the previously published output was submitted to the 2008 RAE, the panel will assess only the distinct content of the output submitted to the REF".

The current guidance is contradictory but suggests that, for Panel C, it is possible that a journal article submitted to the REF may be considered ineligible due to prior circulation (before 1 January 2008) as a working paper (which was not submitted to RAE 2008). This approach, if adopted, will seriously damage disciplines such as Economics and Econometrics (UOA 18).

We request clarity on how 'original content' should be evidenced. In the case of working papers of empirical nature, this may not be easy to define. Guidelines to the evaluation process of 'new and distinct' content would be helpful.

Para. 44. Rather than listing all the types of research output that should be considered as exceptions to "representing the published version of the work", the criteria of 'published' should be further clarified; otherwise, (1) work may be held back from early dissemination because of possible future REF submission and (2) it may prove unfair to the publication process in certain UOAs, for example in UOA18, Economics and Econometrics.

We suggest that all panels should adopt the approach that if the output was submitted to RAE2008, then sub-panels will assess only the distinct content, including the additional research or new insights, reported in the output submitted to the REF. However, panels should allow submission of outputs which may have appeared in the public domain in another form prior to 1st January 2008, and institutions should not be required to submit clarification on earlier versions or content as this will cause extra burden both to institutions and panels. In addition, if the assessment criteria are unchanged, this may cause discrimination against some subject disciplines where there is a considerable publication time lag, for example UOA18, Economics and Econometrics. In many disciplines, there is a culture of allowing early access to archival versions of research prior to refereeing and/or formal publication, and the REF should not be allowed to inhibit communication of research findings.

6. Assessment criteria: impact (Section 3)

a. Overall, the main panel's criteria relating to impact are appropriate and helpful to institutions in preparing submissions.

Strongly Agree	<u>Agree</u>	Neither agree or disagree	<u>Disagree</u>	Strongly disagree
<u></u>	<u> </u>	<u>•</u>	<u> </u>	<u></u>

b. <u>Please comment on the criteria in Section 3, in particular on where further clarification is</u> required or where refinements could be made.

Panel C has, relative to other panels, provided very little information on the range, examples and evidence for impact case studies. We request that more information is provided to institutions on what Panel C is expecting in impact submissions.

Para. 79: We request clarity of the term 'organisation' and whether it applies to
'private for profit' as well as 'non-profit' sectors.

7. Assessment criteria: environment (Section 4)

a. Ove	all, the mair	panel criteria	relating to	environment	are clear and	d appropriate.
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Strongly Agree	Agree	Neither agree or disagree	<u>Disagree</u>	Strongly disagree
<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u>©</u> _

b. <u>Please comment on the criteria in Section 4, in particular on where further clarification is required or where refinements could be made.</u>

In terms of consistency, the omission of any indication of the relative weightings of the components involved in the assessment of environment by Panel C is striking. All other panels have provided a breakdown, and we request that Panel C also provides this information.

8. Working methods (Section 5)

a. Overall, the working methods of the main panel and its sub-panels are clear and appropriate.

Strongly Agree	<u>Agree</u>	Neither agree or disagree	<u>Disagree</u>	Strongly disagree
<u> </u>	<u> </u>	<u>•</u>	<u> </u>	<u>c</u>

b.	Please comment on the	working	methods,	in	particular	on	where	further	clarificat	ion is
requir	ed or where refinements	could be	e made.							

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No issues		
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Part 2D: Main panel D criteria and working methods

3.	Main	panel	criteria	and	working	methods
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a. The main panel statement achieves an appropriate balance between consistency and allowing for discipline-based differences between the sub-panels.

Strongly Agree	<u>Agree</u>	Neither agree or disagree	<u>Disagree</u>	Strongly disagree
<u>c</u>	<u> </u>	<u>©</u>	<u> </u>	<u>C</u>

b.	Please comment on the balance between consistency and allowing for discipline-based
differe	ences between the sub-panels within this main panel. Please state the UOA(s) on which
you a	re commenting.

No issues			

4. Submissions and units of assessment (Section 1)

- a. <u>Do the **UOA descriptor and boundary** statements provide a clear and appropriate</u> description of the disciplines covered by the UOAs? Please include any suggestions for refining the descriptors and state which UOA(s) you are commenting on.
- Para. 5. UOA 28 Modern languages and linguistics: includes research on the languages of Europe and Latin America. Our interpretation of the current guidance is that language research on other modern languages (such as Arabic and Chinese) has been excluded from UOA 28 by this boundary definition and this requires clarification.
- Para. 11. UOA 30 History: Contemporary History should be explicitly listed in the descriptors.
- Para. 22. UOA 33 Theology and Religious Studies: Biblical Studies should be explicitly listed in the descriptors.
- Where boundaries and descriptors are unclear, it would be helpful to institutions to understand how clarification on specific boundary issues, such as the issues above, might be obtained.

b.	<u>Please</u>	comme	ent on t	the main	panel's	<u>criteria</u>	in r	<u>relation</u>	to	<u>multiple</u>	<u>submi</u>	<u>issions</u>	in its
<u>UOAs</u>	<u>.</u>				•					-			

No issues

5. Assessment criteria: outputs (Section 2)

a. Overall, the main panel criteria relating to outputs are clear and appropriate.

Strongly Agree	<u>Agree</u>	Neither agree or disagree	<u>Disagree</u>	Strongly disagree
<u></u>	<u>c</u>	<u>c</u>	<u>•</u>	<u> </u>

b. <u>Please comment on the criteria in Section 2, in particular on where further clarification is</u> required or where refinements could be made.

Criteria and level definitions: Para. 51. The definition of 4* output uses the wording "ought to be" in Table 1. We suggest that this wording is removed as a piece of research can only be world-leading if it is recognised as such by the international scholarly community. The wording "ought to be" is unduly subjective in our view. The descriptors of quality level definitions employed by Panel D are less explicit than those provided by, for example, Panel B. We would welcome more guidance in this area.

Para. 52. We also suggest that the concept of "deserved influence" should be removed from the definition of benchmarks. "Deserved influence" is speculative and not measurable. We suggest that the sentence is altered to read: "They will relate to the actual or likely influence of the work.

Output Types:

Para. 54. We suggest the addition of "database" as an eligible output type.

Edited volumes: In a number of fields, edited volumes involve considerable intellectual and research effort in bringing together a coherent volume. Thus, it may be that editors should also be assessed on the intellectual aspects that they contribute to the organising of edited volumes, such as a larger vision.

Para. 54 and 55. It would be helpful to institutions to have guidance for Panel D stating explicitly that books will not be favoured over articles, if this is indeed the case.

Para. 57. Regarding the assessment of outputs listed against an individual in a submission including significant material in common. Para. 108 in the *Assessment Framework and Guidance on Submissions* states that "sub-panels may decide to assess each of these outputs in terms of the distinct material included in each or judge that they should be treated as a single output if they do not contain sufficiently distinct material." However this is contradicted in Panel D draft criteria para. 57, which states that "The sub-panels recognise that there may be cases where two or more research outputs listed against an individual in a submission include significant material in common. The sub-panels will use their professional judgement in assessing such outputs. For example, where a submitted article is subsequently incorporated in a book which is also submitted, the article will be assessed, and the book will be assessed with that section disregarded." We suggest that the wording in para. 108 in the Guidance of Submission should be revised in line with the wording in para. 57.

Double-weighting:

Para. 63 – 66: double weighting. We commend Panel D's decision to allow double

weighting and also submission of reserves. We would appreciate more guidance on when it is appropriate to request double-weighting. Will all sub-panels apply the same criteria in accepting requests for double weighting?

We do not agree with the statement expressed in para. 63 that the scale of academic investment may have 'limited the ability of an individual researcher to produce four significant outputs', hence the recognition by the Panel for the need for double-weighting. We suggest the removal of the quote above as it is misleading and may give institutions an unhelpful steer.

Publication rate: There are real differences in the publication cultures and, thus, the publication rates in (1) the arts and humanities versus (2) the sciences and medicine. These differences reflect the length of research production, slow review and acceptance publication rates and greater publication lags for volumes compared with journal articles. There are concerns that our research evaluation exercises have modified the nature of research in some subject areas, and not necessarily for the better (major scholarly books may take many years to complete). The arts & humanities tend to have fewer 'outputs' than the sciences and, therefore, must choose submissions for REF from smaller populations. These practicalities should be considered in all research assessments.

We request clarity on how 'original content' should be evidenced. In the case of working papers of empirical nature, this may not be easy to define. Guidelines to the evaluation process of 'new and distinct' content would be helpful.

6. Assessment criteria: impact (Section 3)

a. Overall, the main panel's criteria relating to impact are appropriate and helpful to institutions in preparing submissions.

Strongly Agree	<u>Agree</u>	Neither agree or disagree	<u>Disagree</u>	Strongly disagree
<u> </u>	<u></u>	<u> </u>	<u> </u>	<u>_</u>

b. <u>Please comment on the criteria in Section 3, in particular on where further clarification is</u> required or where refinements could be made.

Evidence of impact:

We have concerns regarding being able to provide sufficient evidence to support our impact case studies, especially where the impacts are not economic in nature.

Number of impact case studies:

Although not strictly an issue for Panel D alone, the *Assessment Framework and Guidance on Submissions*, para. 156. (Table 1) states the number of case studies that will be required per submitted FTEs. In our view, this algorithm is biased against small submissions. The production and gathering of evidence for 2 case studies, for small submissions, will place a disproportionate burden upon them. We request that submissions with **7 or less FTEs** be permitted to submit **one impact case study** without penalty.

Examples of Impact Case Studies:

Particularly for sub-panels not included in the Impact Pilot, it may be useful to provide examples of impact case studies.

7. Assessment criteria: environment (Section 4)

a. Overall, the main panel criteria relating to environment are clear and appropriate.

Strongly Agree	Agree	Neither agree or disagree	<u>Disagree</u>	Strongly disagree
<u> </u>	<u> </u>	<u>•</u>	<u> </u>	<u>_</u>

b.	Please comment on the criteria in Section	n 4.	, in	particular	on	where	further	clarification	า is
requir	ed or where refinements could be made.			•					

No Issues			

8. Working methods (Section 5)

a. Overall, the working methods of the main panel and its sub-panels are clear and appropriate.

Strongly Agree	Agree	Neither agree or disagree	<u>Disagree</u>	Strongly disagree
<u></u>	<u> </u>	<u>•</u>	<u> </u>	<u> </u>

b.	Please comment on the	working m	nethods, i	n particular	on where	further	clarification	is
requir	ed or where refinements	could be n	made.					

No Issues

University of St Andrews response to REF 2014 'Consultation on draft panel criteria and working methods' 5 October 2011