

## 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](mailto: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](mailto: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](mailto: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](mailto: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](http://www.informationcommissioner.gov.uk). Equivalent legislation exists in Scotland.

#### Respondent's details

<b>Are you responding:</b> (Delete one)	On behalf of an organisation
<b>Name of responding organisation/individual</b>	University of St Andrews
<b>Type of organisation</b> (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 accept many of the key features of the REF, but we are concerned that (i) the time scale is short, (ii) clearly recognised discrete disciplines might be expected to make shared submissions, and (iii) at this stage such a large weighting should be given to non-academic impact.

The time scale is unexpectedly short, both in terms of the need, and cost, of assessing research this frequently, and in the context of bedding down impact as a new aspect of assessment.

We are surprised that given the maturity of the UK 'Knowledge Transfer' (KT) agenda, an assessment of engagement in the wider KT agenda is not considered more appropriate for REF than engagement in what appears to be a narrower and more restrictive definition of impact. The KT agenda has the advantage of being better defined and bedded into the UK higher education system, and easier to evaluate robustly. If impact is retained then it is important that the definition be broadened to incorporate more clearly the full spectrum over which universities have non-academic influence on society.

If separate disciplines are submitted in shared submissions, it will be extremely difficult to unpick the state of the individual disciplines submitted in this way. It will not be possible, for example, to rank Philosophy and Divinity departments individually across the UK, nor to evaluate the strengths of these subjects. This remains a major disadvantage, and it could have major consequences for the sustainability of these disciplines (e.g. Philosophy, Divinity, History, Classics and History of Art) in the future.

The reasons for assessing non-academic impact remain clear, but (a) it needs to be carefully handled so as not to disadvantage open innovative research that might have considerable, and unexpected, impact in the future. This may be critical in the development of UK plc in the medium to long term. (b) 25% for non-academic impact would appear to be too high for an aspect that remains poorly defined. It remains difficult to see how this can be reliably assessed, and so there are concerns that such a potentially unreliable source of information could inject substantial random error into the assessment process. An initial starting percentage of between 10-15% might be more appropriate across all disciplines.

More widely, there are concerns over the balance between delivering relatively short-term and largely economic goals, and ensuring that front line university research is seen to be funded for the long-term on time scales that are inevitably longer than those typically supported by industry and political debate. The present focus on impact could have long-term effects on the science-base, taking time away from the fundamental basic research that the University sector excels at.

The consultation as its stand fails to mention 'joint' or indeed 'multiple' submissions to REF by institution/s. We would strongly argue for retaining these features from RAE 2008 as they allowed institutions to be strategic in bringing together their research submissions.

**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.

Institutions should select the research staff and the outputs to be assessed, and institutions should be encouraged to submit all types of high quality research outputs. It is a strength of the UK research assessment exercises that these decisions are left with the individual institutions.

Clarity is required from the outset as to the definition of staff eligible for submission to REF. If the definition remains simply at academic staff “whose primary function is research, teaching or both” then there are some serious issues for institutions. This definition would mean that all post-doctoral researchers and all ‘teaching only’ staff could be considered eligible for submission and therefore included in the staff selection process. This has considerable implications for institutions in terms of burden, determining early career status, Code of Practice issues, appeals and mitigating circumstances. One solution is that for ‘research only’ staff institutions firstly determine if the individual has carried out ‘independent research’ and only then can ‘research only’ staff be considered eligible. In tandem with this approach ‘teaching only’ staff should be considered ineligible by definition, if however such a member of staff is making a substantive and independent contribution to research then the onus should be on the institution to alter the ‘teaching only’ contract to one reflecting the activity of the staff member (*i.e.* teaching and research).

Regarding types of output (paragraph 39), it is our view that intellectually influential academic outputs should not be de-emphasised in the context of applied and translational research. The former represents the core business of academia. Furthermore, ‘significance’ is identified in terms which may amount to impact (‘actual or potential use beyond the academic sphere’). The implication is that an output scored highly for this reason may attract ‘points’ here and again in the impact assessment. While policy is pushing towards ‘impact’ as a key factor in assessment (as stated in paragraph 11), it should not be possible to receive a financial reward twice for the same aspect of a piece of work. As stated, impact intrudes into both ‘output’ and ‘environment’, however the reverse is not the case - so paragraph 53b states categorically that impact cannot include ‘intellectual impact’.

The emphasis on the user beyond the academic sphere in paragraph 40 is equally inappropriate. If these are to be assessed and rewarded this should be restricted to the category ‘impact’. In practice this means that research excellence-based outputs are to be rewarded with even less than the stated 60% of the financial return.

The stated aims in paragraph 41 of “achieving the highest degree of discrimination at the top end of the scale” could, as result of decreasing research rated 4\*, result in an overall lack of fine-grained outcomes from REF by increasing the proportions rated 2\* and 3.\* This significantly reduces the

ability of REF to differentiate the outcomes: 90% could lie within the 2\*/3\* categories and would reduce its usefulness as a funding driver. In addition, a change of definition of 4\* makes a comparison with RAE 2008 more difficult.

One issue that needs to be addressed is how author contribution to multi-authored papers will be assessed consistently across panels in REF. In RAE 2008 the assessment of a "substantial and distinct contribution" by authors to these outputs was taken very seriously by some RAE panels while other panels ignored this issue. Will the assessment of author contribution be standardised across UoAs? It is presumably better to adjust the score in line with the author's perceived contribution rather than give an "all or nothing" score.

Citation data on individual outputs should not be part of the institution submissions, not least as they are of little use for recent publications, they are difficult to compile robustly close to the deadline, and extremely difficult to audit. There might be a role in using citations for whole units of assessment. In practice different subject areas make different use of citations and these will probably be used by panels in disciplines that use them consistently, and are aware of the strengths and weakness of this approach. We would be happy to see this decision left to the different panels, but the citation data should not be part of the institutional submissions.

More widely there will need to be clear guidelines over the use given to citations and the weight they will receive, or there will be confusion over the basis for selecting the outputs submitted. The REF reviews a recent period, and citations are clearly better suited to judging the impact of a piece of work over a longer period. Staff are at present confused as to whether to include an excellent very recent paper in a good journal, or an older paper that has accumulated citations. It needs to be clearly stated that the citations on individual pieces of work will not be a factor in determining the status of that work.

We would welcome 4 outputs per individual in Science, and 3 in at least some areas of the Arts particularly if the proposed assessment period remains at five years.

It makes sense to double-weight certain outputs, such as books and monographs, but we urge that clear guidance is given as to whether panels or the submitting institution decides which outputs will be double-weighted. The latter would be preferable.

We are concerned that the guidelines imply that not all the submitted outputs will be read. In practice some may be read more quickly than others, but it is a dangerous principle to state that not all will be read and to indicate how many might be. All outputs should be assessed.

**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.

The link between research and its social, political, cultural and economic impact is important and it is appropriate and timely that it be assessed. We welcome the statement that impact is international and not confined to the UK, however, we do have concerns, particularly with reference to humanities research, as to how the impact of their 'international' research will be robustly assessed (e.g. a UK researcher in Spanish whose work has impact in Mexico).

Key aspects of the time-lag challenge may need further consideration. University Departments (and related Units of Assessment) are fluid, with considerable staff turnover through a 10-15 year period. Will impact occurring in the REF period, but initiated from research undertaken by staff members no longer employed, be included? If not, Departments that develop many young staff who move institution for career enhancement could be disadvantaged. If so, will ex-employees be required to contribute to the REF submission? Is there a conflict of interest here?

Within any discipline, or sub-discipline, some types of research are more amenable to generating measurable impact than others. How will the requirement for evidence of impact across the breadth of a Unit's submission be balanced against the prevalence of curiosity-driven research that may not result in demonstrable impact for a number of decades? At present there are concerns that the menu options for types of research impact, in annexe D, largely excludes disciplines like the humanities. The menu also includes items which are clearly not impacts. For example, Research contracts and income from industry, collaborative research measured through joint outputs, research income from government organisations etc are, at best, only evidence that someone considers that the work will at some unspecified time in the future have some, unquantifiable impact. Income will be a key part of environment and best assessed for significance in the environment section. To consider it under impact would be false and lead to double counting.

The focus on impact is going to add a large burden both for researchers and institutions and it is difficult to see how it will be based on quantitative measures. There are decisions to be made over issues such as science policy: in policy studies, for example, these might be a core output, whereas in some sciences they might be better measured as impact. Very clear guidelines will have to be developed.

Similarly might books written by scientists, for example, be better submitted as impact rather than outputs? The guidelines will need to be clear.

Levels: we feel that the 4\* level for impact is not appropriately defined. A research programme could have huge impact in a very small area (e.g. discovery of a drug to cure a specific disease). The 4\* level requires impact across a 'range of situations' hence effectively excluding focused impacts. Further, the rating scale for the levels of impact seems weighted in favour of product over process, e.g. process innovation is rated as one star. We suggest that examples of excellence in process innovation be included for each of the star ratings.

Using case studies as the means of providing the bulk of the evidence for the assessment of impact would seem to a sensible approach. Clear guidance on the submission of case studies will be required and will need to cover issues such as how case studies can provide evidence "across the full range of the submitted unit's research strategy" when institutions are only able to submit one case study per 5-10 FTE staff. Will staff associated with case studies require to be named?

Classified/Confidential work. A significant amount of work that has an impact in industry relates to industrial processes and products and researchers have signed a non-disclosure agreement to ensure that this information is not released to third parties. A smaller fraction of the work is classified and disclosure is only permitted to those with appropriate security clearance. It remains unclear how such work will be reported. Non-disclosure agreements currently signed by staff are such that much of the information that it is currently suggested should be in an impact case study cannot be disclosed. At present there is no practical means of modifying the non-disclosure agreements to allow this information to be provided.

The REF impact definition of 'research users' may be difficult for some disciplines, e.g. English literature, since the structure of the proposed scheme rules out scholars and students as part of the impact user community.

The consultation document acknowledges that there are many, as yet, unsolved issues regarding providing a robust process for assessing impact in REF, we would therefore strongly encourage the funding bodies (i) to consider reducing the weighting on impact from 25% to between 10-15% and (ii) to ensure that the consultation with the sector and users on impact continues during and after the pilot as considerable work is needed to address issues in what is an extremely short timetable.

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

There appears to be a degree of overlap between what the consultation document refers to as 'engagement' (par. 79) and Impact. Engagement with the public appears in both Impact and Environment; it should presumably not be counted twice and it is more appropriate under Impact.

Esteem and the active involvement of researchers in national and international organizations should certainly be categories in assessing the research environment/engagement of UoAs.

There is a real concern in some disciplines that unless REF allows multiple submissions to units of assessment that it will be impossible to submit a clear and coherent research environment statement across disciplines thrown together e.g. Divinity and Philosophy.

There are concerns in some areas that 'critical mass' is not sufficiently well defined (paragraph 79). Moreover, if a researcher works in a network largely external to the institution, there may be less need for critical mass within. Indeed there is no mention of 'joint submission' to REF in the consultation document, this is a significant omission and we would strongly encourage building in this process to REF where appropriate.

Besides the problems in correctly attributing impact to the "right" institution, impact is a backward looking measurement, whereas environment is a proxy for the capability of the UoA to produce research in the future. It seems more appropriate to give higher weight to research environment than to impact.

**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.

Research environment and the quality of the outputs are a higher priority than what is relatively short-term impact in any assessment of research excellence:

- we need to retain and to value medium to long term research excellence
- non-academic impact is an important objective but it remains poorly defined and difficult to assess
- the present degree of emphasis on non-academic impact runs the risk of distorting the distribution of research and the behaviour of academics in ways that undermine the stated aims of the REF
- as presently configured the REF seeks to reward types of outcome that can rarely be predicted at the planning stages of research, and these might blinker and restrict innovative opportunities in the future.

A suggested weighting would therefore be:

Outputs – 65%, Impact – 15%, Environment – 20%

**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 are concerned about the sustainability of disciplines that may be assessed under a single REF UoA (e.g. Philosophy and Divinity). If UoAs encompassing more than one discipline are retained, it is a high priority that separate submissions (e.g. multiple submissions) for different disciplines will be permitted.

It is currently unclear which REF UoA would be appropriate for the assessment of a Film Studies department submission.

A panel for European Languages and Studies reflects the way most Schools of Modern Languages are constituted nowadays. However, there will be considerable challenges for one panel to assess scholarly texts written in Russian, Slavonic, French, German, Dutch, Scandinavian, Italian, Iberian, Latin American, East European and Celtic languages. Presumably the panel will have to be, in reality, a replica of the previous setup (i.e., a constellation of subpanels that reflect the different languages/disciplines). There is some concern over why European Studies are included and not those other areas where the target languages are spoken, i.e. Latin American, African,... even Asian studies?

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

Ensuring consistency between panels both in terms of methodology and assessment is critical to ensuring that the outcomes of REF are accepted as a robust assessment of UK research. Lack of consistency was a major failing of RAE 2008. The consultation document goes some way to reassuring the community that this is taken very seriously however it is very important that in practice Panels adopt consistent approaches.

The practice of some RAE panels of allocating a single grade to esteem and or environment should have been prohibited and care must be taken that panels do not approach impact with a similar mind set.

Paragraph 101e: if individual panels are left to determine the importance of critical mass, as proposed, consistency may be damaged.

We are concerned that overemphasis on two-tier panels with part-time members will reduce the effectiveness and, ultimately, the credibility of the exercise.

**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.)

The Society for Cinema and Media Studies is not on the list of nominating bodies. SCMS is the leading international association for the study of film, and as such it should presumably be included on the list of nominating bodies. The address of the Society is: 640 Parrington Oval, Wallace Old Science Hall, Room 300, Norman, OK 73019, USA. The contact person is: Patrice Petro (SCMS President), ppetro@uwm.edu).

**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?

Explicit guidelines on interdisciplinary research are to be welcomed, and it is crucial to ensure that there are panel members who themselves conduct interdisciplinary research.

We are concerned that inter-disciplinary work is properly assessed and the extent to which the reduction in the number of panels makes this more difficult. It is important that inter-disciplinary submissions are explicitly flagged and that the submitting university has the opportunity to request a review from the relevant sub-panels i.e. this should not be solely at the discretion of the panel.

**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 disagree with paragraph 110 b on Page 31. Staff that move from Industry into a HE Institute, should be able to demonstrate high level productivity/research during their time in industry e.g. patents, innovations, high level leadership etc. The track record of the individual in industry needs to be clear to the panel. Credit should not be given for 'recruiting an industrialist' per se, it must be given to recruiting an excellent industrialist. There are poor and well as excellent industrialists. The flow of industrialists to the academy will increase in the next few years due to the financial climate and the push for Impact within HE.



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

We welcome the proposal to have a more consistent and simplified approach to the treatment of individual staff circumstances. We support formation of central group providing guidance on handling individual staff circumstances to panels however we urge that the remit of the group be extended to providing guidance to institutions on these important issues.

The consultation does not give enough detail on definition and treatment of Early Career Researchers. The proposed emphasis on citations and impact is likely to adversely affect this category of staff.

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

The proposed timetable is too short, both in terms of the need, and cost, of assessing research this frequently, and in the context of bedding down impact as a new aspect of assessment. The added complication of providing outputs prior to submission to match with citation data could also cause problems given the short timetable. In addition, we are concerned that the timetable will be tight in general terms, in giving institutions sufficient time to prepare for assessment in response to submission guidance and panel criteria once they are published. The shorter assessment period relative to RAE 2008 (five years versus seven years) is likely to seriously disadvantage disciplines where a major proportion of the research is in the form of monographs.

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

One way in which the burden could be reduced is by ensuring that institutions are not put in the position of submitting to REF before the end of the 'publication period' as happened in RAE 2008. This increased the burden and pressure on institutions and researchers to ensure all submitted publications were 'publicly available' while actually this was under the control of publishers and not institutions.

The burden to institutions could be reduced by ensuring that only essential differences in panel criteria are included in the process.

The approach of using HESA data for collection of research income and student data is good in principle as long as alignment of the data for REF is carried out in sufficient time to allow provision of robust and granular data to REF.

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

The humanities sector is proportionally more dependent on RAE/REF driven funding for research than, for example, STEM subjects. There is therefore concern that unless REF is seen to be a robust tool for assessing research excellence and distributing funding then funding for particular disciplines could be adversely affected. We would caution against the significant usage of as yet untested indicators, such as those being proposed for impact, which could potentially lead to distortions in assessment of research and subsequent funding.