Response to the Consultation Paper on
the Second Research Excellence Framework

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?

1. We strongly support the funding bodies’ expressed intent of maintaining an overall continuity of approach with REF 2014, and in particular keeping the outputs, impact and environment structure and maintaining peer review. **However the Consultation document actually proposes changes that are far from minor or incremental. There is too little recognition of the additional burden and cost associated with many of those changes.** In addition, were the sector to adopt all of the changes foreshadowed, the 2\textsuperscript{nd} REF will be very different from REF 2014, and it will therefore be difficult to compare results or assess trends.

2. ‘Reducing burden’ was a key principle set out in *The Independent Review of the REF* and the Consultation Paper. It follows that changes to REF structures, processes and rules should only be made where it can be shown that they would actually reduce the burden of the exercise. Many of the major recommendations in the *Independent Review* report, if adopted as is, would *add* rather than reduce complexity, time and cost. In its report to the funding bodies, the Technopolis Group noted that 75\% of HEI respondents felt that the lessons learned from REF 2014 would result in the same or less overall institutional cost if *the next REF were to follow the same submission process* [emphasis added].\(^1\)

3. Bearing these points in mind, suggestions we propose below take into account ‘burden’, the costs of change and cost-benefit whilst also upholding the spirit of the Stern Review’s other principles wherever possible.

Unit of Assessment structure

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

4. We would like to see as much continuity as possible with the REF 2014 UOA structure.

5. Not all UOAs were equally homogenous in terms of their remit: the consultation highlights UOA 17 (Geography, Environmental Studies and Archaeology); but similar issues apply in others, including UOAs 27 (Area Studies), 28 (Modern Languages and Linguistics), 34 (Art and Design), and 35 (Music, Drama, Dance, and Performing Arts) and 36 (Communication, Cultural and Media Studies, Library and Information Management). **We strongly encourage sub-panels to publish clear guidance on when separate submissions would be appropriate** (and acceptable) in order to recognise different research methods and/or practices, and ensure disciplinary cohesion. Where a UOA’s remit spans several distinct disciplines, the number of sub-panel members should also be increased to ensure there is sufficient breadth and depth of expertise.

6. With regard to specific examples raised during the consultation
   - Oxford would support a sub-division of UOA 17 into two sub-panels as we understand that, at times, the voice of the small Archaeology sub-panel was felt to carry less weight than that of its far larger Geography counterpart.
   - Oxford opposes any change to the engineering UOAs (12–15). In the context of a new Industrial Strategy, it is even more important to retain the visibility of UK strengths in different branches or sectors of engineering.

**Expert panels**

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

7. Yes: early finalisation of both elements will allow HEIs to start preparations earlier in the REF 2021 period, without the risk of significant abortive effort or uncertainty.

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

8. No: Oxford believes sub-panels should be formed early on and be fully involved in the development of submissions guidance and panel criteria. Further consistency should not become a move towards uniformity: sub-panels play a crucial role in ensuring that legitimate, discipline-specific nuances and variations are taken into account. In UOAs with a wide disciplinary spread, it is not feasible to expect a sub-panel chair (on his/her own) to be aware of all such differences; to do so would place undue responsibility and pressure on individuals and could undermine sector confidence in the REF’s objectivity and credibility.
9. Later appointment would allow less opportunity to check the representative composition of the sub-panel, and to address any significant gaps in expertise. Relieving sub-panel members of institutional duties in advance of the review phase also becomes more challenging for HEIs if the post-appointment lead time is reduced. So whilst we recognise that the effort involved in forming sub-panels is high (particularly for HEFCE), we believe the benefits outweigh the costs.

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

10. Yes, although it is essential that expertise germane to the REF must remain the primary selection criterion.

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

11. Oxford supports the proposal to simply open up nominations to all organisations and individuals. A more open process should help to increase the calibre and representativeness of the candidate pool. Consideration should perhaps be given to a requirement for HEI nominees or individual self-nominees to have a minimum number of ‘endorsements’ (from other HEIs) as evidence of their standing in the community.

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

12. Yes, in principle. However, this should be kept as simple as possible and draw upon data that organisations already collect for statutory purposes. It would be unfortunate if additional reporting burdens discouraged user groups or other expert stakeholders from nominating (sub-) panel members.

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

13. 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?

14. **We do not support this proposal, which we believe will be highly problematic and create additional burdens for UOA panels and REF staff in HEIs and HEFCE.**

(a) HESA guidelines state that “cost centres should be allocated against the source of funding for the [individual’s] contract as opposed to the actual activity undertaken.”

This increases the risk that outputs from some individuals would be assessed in an inappropriate UoA.

(b) HESA cost centre mappings have traditionally reflected *undergraduate (UG) teaching responsibilities* and institutional structures, rather than research disciplines. Research specialisms may not align directly with an academic’s core UG teaching. Using cost centres would therefore lead to significant numbers of staff being returned to a UOA that would not have the most appropriate expertise to assess their outputs, requiring additional cross-referral.

(c) Even where an individual’s teaching and research are wholly aligned, there isn’t a definitive 1:1 mapping between cost centres and UOAs. HEFCE guidance shows that some cost centres map to more than one UOA and vice versa, so legitimate room for discretion (as opposed to ‘tactical’ game playing) is not removed in all cases.

(d) Internal analysis of REF 2014 data for Oxford indicates that over 25% of eligible staff were allocated to a UOA that did not directly match the cost centre of their contractual department (based on a 1:1 mapping). The degree of discrepancy varies by Main Panel, with higher levels of ‘misalignment’ in Panels A and C.

(e) Mapping based on HESA cost centre data is particularly unsuitable for multi- or interdisciplinary research units, and could act as a disincentive for HEIs to establish such entities. To give one example from Oxford: the Blavatnik School of Government is mapped to cost centre 128 (Politics and International Studies), but less than 50% of its staff work within UOA 21 (Politics and International Relations); others come from fields including law, philosophy, economics and development studies.

(f) An automatic, cost centre-driven mapping would also exclude curatorial and other research-active staff working in university museums, libraries and other research collections. Typically, they are mapped to cost centre 201 (All Academic Services), but will contribute to research/collaborate with staff in a variety of UOAs. For example, in REF 2014, staff from the Oxford Museum of Natural History were returned in UOAs 5, 7 and 17.

15. **Institutions should retain the flexibility to return staff to the UOA most appropriate to their research activity and outputs.**

16. Institutions should retain the flexibility to map multi-disciplinary departments across to the disciplinary fields of individual faculty.

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2 [https://www.hesa.ac.uk/collection/c16025/coding_activities_and_cost_centres/]
17. It is important that any REF-driven changes to HESA returns do not compromise data quality or the use of HESA data for other statistical and comparative purposes (which could result from changes to the cost centre structure). When a new HESA staff return data architecture was introduced in 2012/13, guidance stated: “all academic staff whose contracts include research will need to be mapped to REF UOAs on an annual basis” (emphasis added); yet the REF UOA field was removed from 2014/15 onwards. **We recommend that this field be reintroduced.**

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

18. The definition of ‘research-active’ staff should be as consistent as possible with the REF 2014 definition of ‘Category’ A staff. The eligible population should be defined in the same way as REF 2014: i.e. independent researchers on T&R or R-only contracts.

19. Whilst, in principle, use of HESA data could help to ensure consistency between submissions and provide a clear audit trail, the current HESA data structure does not provide an automatic way to identify these (‘Category A’) staff. As we are unsure how data from the research assistant (RESAST) field in the current HESA return is used, it is unclear whether that field could serve as a suitable flag, or if an entirely new field will be required. As it is unlikely that a ‘Cat A’ identifier could be introduced much before the 2019/20 HESA return, we believe the REF 2021 volume measures (for staff and outputs) should continue to be based on a census date FTE, rather than an average.

20. The definition of a research assistant used in REF 2014 generally worked well; the 2014 REF 2014 Manager’s Report commented that “HEIs were able to apply the criteria consistently, as indicated by the very low rate of error we found when we carried out sample-based audits of staff eligibility.”

21. The University would wish to submit the outputs of College staff who have a significant responsibility to undertake research, as it has done in previous RAEs and REF 2014.

**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?

22. We appreciate the intent behind the Stern Review’s proposals to ‘depersonalise’ REF, in an effort to reduce the negative effects of non-inclusion (on morale, career progression, and individual choices around research/publication strategies). Nevertheless, such a separation is artificial and the focus - and the related emotive aspects, time and cost - will simply shift from staff selection to outputs selection.

23. The question of ‘fixed or variable’ is inherently linked to which staff are returned. If HEIs retain the ability to select staff, then introducing the added complexity of variable outputs will increase, not decrease, aggregate selection burdens (as we argue above, the least burdensome approach will be retaining staff selection with a fixed number of outputs, as

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3 [http://www.ref.ac.uk/pubs/refmanagersreport/](http://www.ref.ac.uk/pubs/refmanagersreport/) - page 23
per REF 2014). However, a variable number of outputs becomes a more attractive proposition under an 'all-staff' model.

24. Some concerns have been expressed about the psychological effect on individuals with fewer outputs submitted than their colleagues. However, providing there is no published mapping of outputs to staff (i.e. separate lists of staff and outputs, as per REF 2014) that information will be far less visible compared to exclusion from REF 2014. Is that approach consistent with transparency?

25. We agree with the aim that REF 2021 should not increase sub-panel loads; and note that a multiplier of 2 per FTE will achieve this in aggregate, across all UOAs. But the effects vary widely by UOA, depending on 2014 submission rates (based on HESA contextual data): ‘all-staff’ with 2N outputs would see volume increases of >25% for twelve UOAs (or >30% for nine): 1*, 7, 8, 9, 10, 17*, 24, 29*, 30, 31, 32, 33 (where * denotes UOAs in the range 25% - 30%).

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

26. Of the options suggested in the consultation, we believe the maximum should be no more than 4 outputs per person. This ensures that the quality profile is not disproportionately driven by a small subset of a unit’s activity, allowing differentiation between submissions with strength and breadth and those with pockets of excellence and a long tail.

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

27. Oxford believes that for staff in post on the census date, the minimum number of outputs per person (or per FTE) should be one (1) – except where special circumstances apply. This acts as a validation check that staff classified as ‘research active’ genuinely are undertaking research. Without an objective test of this nature, there is a risk of game playing whereby the REF/QR volume driver is artificially inflated through the inclusion of staff with zero outputs who are not actually research active.

28. In addition to the risk of tactical game playing, ‘submitting’ someone to REF 2021 with zero outputs would likely have the same negative psychological impact as excluding them from REF 2014.

29. Part of the rationale for a minimum of zero outputs is the argument that it removes the burden associated with assessing individual special circumstances. However, we would expect the Funding Bodies to continue to ensure that appropriate measures are in place to protect equality and diversity in REF 2021, to ensure certain groups of staff are not adversely affected – thus undermining this argument in favour of zero outputs. Such an option should be allowed only in special circumstances, and not by other choice.

30. As a minimum of 1 retains some link between outputs and individuals, the FTE should be on a census date rather than the average over the REF period.

31. Given the range of possible options – and interconnection between proposals relating to staff selection, number of outputs, and portability of outputs – it is important that the final proposals are carefully piloted to guard against unintended consequences or perverse outcomes.
**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?

32. We do not support the proposal to use ‘date of acceptance’ for publication as a marker for where an output was ‘demonstrably generated’ (noting - see Q10 (d) below - that under the model we propose below a model, in which both the ‘old’ and ‘new’ HEI receive some credit for the quality of an individual’s work (rather than a binary ‘all-or-nothing’)), then trying to define where an output was ‘demonstrably generated’ is less of an issue.

33. ‘Date of acceptance’ is not a sufficiently robust indicator; not all classes of output have a formal, and unambiguous, date of acceptance, potentially leading to inconsistent treatment across different UOAs, which would conflict with the Funding Bodies’ stated principle of ‘equity’ of assessment. Date of acceptance is also open to gaming. Many publishers in humanities disciplines sign contracts several years in advance of actual publication; lead times like this, plus the value of double weighted outputs to UOA returns, could encourage behaviours such as delaying contract acceptance. Date of submission’ for publication would be even harder to define and audit.

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

34. The REF Open Access policy has already demonstrated the burden and challenges associated with determining dates of acceptance – with UK HEIs often spending scores or hundreds of thousands of pounds each year in staff time and processing costs. Date of acceptance for journal articles is not declared by publishers to HEIs, nor is it available openly, but directly to the lead/corresponding author. Co-authors rely on the corresponding author informing them of acceptance, which doesn’t always happen. Finally, not all publishers or (in particular) conference organisers issue a ‘formal’ date of acceptance.

35. If the date of acceptance is being used to determine not only whether an output complies with the Open Access requirements, but also its institutional attribution, then the stakes are higher, and both institutions will likely wish to undertake assurance checks – further increasing burden across the sector as a whole.

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

36. **We believe there is a very real danger that ‘non-portability’ could damage UK higher education and research** – with adverse impacts on individual careers and on mobility in the sector, which is a vital for maintaining a vibrant, high-quality research ecosystem.

   a. It may discourage universities from hiring staff in the latter part of a REF cycle, if it is felt that a researcher would be unable to produce enough high-quality outputs between their appointment and the census date to support their new UOA’s submission.
b. It may discourage researchers from moving organisation close to the REF census date if it means they would likely be returned with few or no outputs.

c. Both these risks increase in experimental disciplines where it takes time to set up a new laboratory.

d. Given that we are already nearing the halfway point in this REF cycle, it could lead to a major slowdown in recruitment and mobility between now and 2020 (and at a time when many in the sector are expressing serious concerns about the impacts of the Brexit uncertainty for EU nationals living and working in or seeking to come to the UK).

37. We are particularly concerned about the impact on early-career researchers (ECRs), who already face huge challenges in a highly competitive, and global, employment market. The proposed rule change could make it much harder for them to win a move to their next job; if, as a result, they leave the HE sector and/or the UK, this would present a long-term risk to the health of the UK research base.

38. One concern raised publicly by ECRs is the risk that their outputs will be ‘claimed’ by an HEI for whom they undertook piecemeal teaching and/or worked as research assistants whilst they produced the outputs required to be competitive in the jobs market. One way to mitigate this would be to say that an ECR’s outputs can only be submitted by a former HEI if they were employed there on a REF-eligible contract and met the ‘independence’ test at that time; if not, then the output(s) become portable, by exception.

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

39. We agree with the argument set out by Stern: that REF should incentivise and reward long-term investment in people and the facilitating environment. The REF informs future funding allocations, based on quality and volume of activity; and measures research quality through a periodic assessment of past performance.

40. Whilst we understand why non-portability had some attractions for the Stern Review panel, and that there can be a REF-related element to measures taken to retain/attract staff, particularly close to the census date, we are unaware of any empirical evidence that the ‘transfer market’ is large or has a material effect on the outcomes of an individual REF. And the difficulties outlined in Q10a–10c illustrate that non-portability is far from being a panacea. It, too, carries the risk of distortion, simply moving the ‘transfer window’ from late in a REF cycle to the start.

41. We believe a model in which both the ‘old’ and ‘new’ HEI receive some credit for the quality of an individual’s work (rather than a binary ‘all-or-nothing’) is highly desirable: it ensures that future funding takes account of the quality of staff in post at the census; but that HEIs receive credit for their past investments. It may also render the concept of a time-limited window for staff movement redundant.

42. It has been suggested that a ‘shared outputs’ model would be impractical to administer. This would be true if the old and new HEIs need to agree who submits which output(s). But we see no reason, conceptually, why both should not be able to submit the same output(s), serving as proxies for the two different aspects of REF: forward-looking quality
for HEI New; and retrospective quality for HEI Old. (Note: co-authored outputs can already be submitted by more than one HEI or UOA.)

43. Shifting attention from ‘which outputs?’ each HEI submits to ‘how many?’ (based on relative length of employment) also avoids the need to determine where they were ‘generated’; any output published during the REF period can be submitted by either HEI – reducing burdens, and removing the need for negotiation between HEIs. We envisage the maximum number of outputs being capped: e.g. if someone moves in the first quarter of the REF period, HEI New can submit 1–3 and HEI Old can, if it wishes, submit 0–1 and (based on a 1–4 standard). Note: a minimum of zero for staff no longer in post ensures that at least 50% of outputs are associated with staff in the census date population, strikes a balance between the forward looking and retrospective aspects of the REF, and avoids the administrative burden that could result from mandatory inclusion of outputs from staff who may have left five or more years ago.

**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?

44. In general, yes. However, it could be argued that unless ORCIDs quickly gain wider traction – from publishers, grant funders, etc. – then, in reality, mandating their use for REF 2021 will not reduce administrative burden (by simplifying collation of information). Rather, it will merely impose another ‘REF action’ on individual researchers. In the long term, ORCIDs do have the potential to streamline data gathering; but the case for their mandatory use is not especially persuasive at this point in time.

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

45. We have no objection to this proposal.

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

46. We agree that the criteria for allowing the submission of research assistants in REF 2014 included an element of interpretation or judgement. However, despite the linked concept of ‘independence’ inevitably involving an element of judgement/interpretation, there appeared to be a good degree of consistency and common-sense overall.

47. It could be useful to try drafting guidelines which take into account disciplinary differences relating to how independence is defined, and to seek feedback.

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

48. We support the proposal to require the submission of a short statement outlining the connection of such staff to the submitted unit. The guidelines do need to guard against
spurious or exaggerated connections to the submitted unit. We welcome the recognition that in some disciplines, e.g. creative arts, fractional contracts are standard practice.

49. We support the minimum of 0.2FTE, which is consistent with REF 2014.

**Collaboration**

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

50. Impact case studies and the narrative part of the environment statement (which in REF 2021 would also include support for impact) already offer ways to recognise effective engagement and collaboration. Importantly, these elements are able to assess the full range of ways in which HEIs collaborate with organisations outside the sector.

51. There is no ‘one-size-fits-all’ approach to successful collaboration; it would therefore be undesirable simply to latch on to the Dowling Review’s interest in inter-sectoral mobility and rush to mandate a new metric in the REF. Firstly, movement of people is an input to the R&D process: REF should assess the quality of the resulting outcomes, and not drive increases in activity purely for the sake of it (a common risk with activity-based metrics). Secondly, equality and diversity issues will require careful consideration in order to avoid adverse effects on certain groups: ‘movement’ may be less feasible e.g. for those with family or caring responsibilities.

52. The funding bodies could look to the Higher Education Business and Community Interaction (HE-BCI) Survey for useful, current indicators of collaboration.

53. If movement of people is of national interest in the future, this and possible measures of such movement should be discussed by the HE-BCI Stakeholders group and rigorously assessed and trialled by HESA.

**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?

54. Yes. This allows the REF to assess the most up-to-date research outputs whilst minimising the risk to HEIs from delays outside their control (e.g. by peer reviewers or publishers).

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

55. Panel guidelines could do more to encourage interdisciplinary outputs. Having a nominated individual on each panel responsible for identifying, on a systematic basis, when an output would benefit from cross-referral could be helpful. Interdisciplinary research expertise and experience should be key selection criteria for membership of some sub panels to ensure that inter- and multi-disciplinary research are more widely considered.
56. The guidelines should lay out HEFCE’s findings that (a) interdisciplinary outputs were less likely to be submitted, however (b) when they were, interdisciplinary research scored similarly to outputs from a single discipline.

57. Mandatory use of an interdisciplinary research outputs identifier will provide meaningful information only if clear guidance is given (most usefully at sub-panel level we envisage) on the definition of ‘inter-disciplinarity’ and the factors/evidence that should be included here. Also, it needs to be explicit what use will be made of this identification.

58. Some main panels in REF 2014 did ask about structures in support of interdisciplinary research. This question could be made explicit in all panel guidelines. The proposed trial/pilot of institutional environment (and impact) templates should explore the appropriate locus/level of assessment.

**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?

59. Peer review must remain the primary mode of assessment. Metrics should be used to support panel members in their assessment, provided there is transparency about their use. A one-size-fits-all approach will not work across UOAs (particularly for arts and humanities) so sub-panels should be able to decide whether they would find it useful to have bibliometric data made available to them to inform peer review. As the UK Forum for Responsible Research Metrics notes, it is important to have panel-level standard practices and to give clear information to HEIs.5

**Impact**

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

60. We support this proposal in the strongest possible terms.

61. A large part of the cost and burden of REF 2014 was due to the novelty of including impact assessment as a new dimension. Maintaining consistency will be key to helping reduce burden in the second REF.

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

62. We are wary of too much change in relation to ‘Impact.’ (see Q.19)

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4 E.g. Under ‘Collaboration and contribution to the discipline or research base’ UOAs to discuss interdisciplinary research, Main Panel C invited UOAs to outline where appropriate, including what disciplines are involved, and arrangements to support interdisciplinary or collaborative research


6 As noted in the REF Accountability Review: Costs, benefits and burden.
63. The REF 2014 Accountability Review estimated that the cost to HEIs of preparing impact statements and case studies was £55m – impact accounted for 25.9% of the overall cost. The Impact dimension would also have added considerably to the funding bodies’ costs. Changing the definition will add to time and costs for REF 2021.

64. Research on the REF 2014 Impact case studies has shown they demonstrate a huge variety of impacts, on many sectors; significant multi- and inter-disciplinarity; and a very wide range of collaborations. Research by Terämä et al. (2016) found that the spread of case studies and the results of their assessment indicate the REF has been able to recognize and reward a diverse range of impact types, with a diverse basis for submission across disciplines. No single type of impact was more rewarded than others. The REF 2014 Guidelines on Impact worked well overall.

65. ‘Ground-breaking academic impacts’ should not be included under Impact: academic impact is and should be assessed through the outputs component of the REF, in particular through peer review by panels (citation data offers evidence of an output’s ‘reach’, but not its ‘significance’). Including ‘academic impacts’ under the Impact component of the REF would dilute the intended focus on impacts ‘outside academe.’ (cf. Q.21)

66. We support the suggestion that the guidance on the REF should make it clear that case studies can include impact on public understanding and through public engagement, impact on cultural life, and impacts on teaching (beyond one’s own institution).

67. If a Main Panel or sub-Panel consider that explanatory notes about Impact for a particular set of researchers would be helpful, then fine. We must avoid any general message or signal that the definition of Impact has changed.

**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?

68. The Consultation Paper (para 79) has been read by some to open up the possibility of ‘academic impact’ being included in the REF definition of Impact. This we understand was not and is not the funding bodies’ intention – which is welcome news. REF impact should focus on ‘wider impact’ (to use the Research Councils’ term); that alignment makes sense. (cf. Q.20)

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

69. Impact assessment worked well overall in REF 2014. ‘Reach’ and ‘significance’ are interrelated, not independent. It is perfectly valid to assess impact both in terms of its inherent quality or transformative nature (‘significance’) and the scale of uptake or effect (‘reach’). We agree that using the assessment criteria ‘holistically’ remains an important principle to maintain in REF 2021.

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

70. We strongly encourage the inclusion of further information regarding public engagement impacts and recommend that the guidance includes the following:

(a) Diversity of impacts - We agree with the Stern Review that “impacts on public engagement and understanding are emphasised and that impacts on cultural life be specifically included” but it should be noted that public engagement can result in health; environmental; educational; economic and policy impacts in addition to cultural and societal impacts and the impacts on the publics directly involved in the engagement activities (such as changes in awareness; aspiration and behaviour).

(b) Validity and value - During REF 2014, there was concern that public engagement would not be rated as strongly as other routes to impact. There were however no significant difference in the scores awarded to case studies featuring public engagement compared with those that do not. Therefore, we recommend that the guidance includes a clear statement that public engagement is a valid and valued route to research impact.

(c) Impacts throughout the research cycle - Further information on the breadth and diversity of public engagement would also be beneficial, noting that the impact on the public can take place at any stage of the research cycle, and not only via dissemination activities once the research has been completed.

(d) What constitutes public engagement impact and evidence - There is no clear understanding as to who is defined as the ‘public’; what counts as impactful engagement and what evidence is required to demonstrate that impact. So defining the types of impacts and evidence required would be beneficial, along with examples of what is, and perhaps more importantly, what is not, valid. Numbers reached, e.g. through national media coverage, should only be used as be an indication of raising awareness – no further claims should be made (such as behaviour change; perception changes) unless further evidence is provided. Smaller ‘reach’ but with deep ‘engagement’ should be welcomed. It would be ideal if the definition of what constitutes ‘public engagement with research’ could be aligned between the REF, HEFCE, RCUK and other key funders such as the Wellcome Trust.

(e) Assessment criteria - Assessment criteria on what 4*, 3* and 2* public engagement impact ‘looks like’ would also be beneficial for both the review panels and the wider REF community.

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?

71. Yes.

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?

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8 https://www.publicengagement.ac.uk/news/role-public-engagement-ref
72. Yes. A single narrative (covering both the environment and impact templates from REF 2014) will reduce duplication, and recognise that some activities underpin or facilitate both research and impact. For example, engagement with end users can both inform future research questions (input) and provide a route to impact (output vector). But it will be important to structure the combined template in a way that ensures the artificial distinctions which applied in REF 2014 (between the two templates) are not simply replicated within a single document.

**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?

73. **We support an adjustment to the ratio, such that the overall volume of case studies remains the same.** This recognizes that impact arises in the near term from only a fraction of current research. Too great an emphasis on impact may have the unintended consequence of reducing attention on the *discovery* on which it is based and from which it is derived. Nearly 7,000 were submitted to REF 2014. If all staff had been returned in REF 2014 with a ratio of 1 case study for every 10 FTE staff, nearly 12,000 case studies would have been submitted (up by 72%). A ratio of 1:15 produces an aggregate rise of 28% (ranging from +118% to -10% at individual UOA level). 1:20 gives a total of around 7,600 (up 9%) and is therefore more appropriate.

**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?

74. Yes. In principle, we support the use of a **small number** of fields to capture key items of contextual information that will support post-assessment analysis and maximise the evidential value of case studies. However, it is important that ‘Not applicable’ is a valid entry for fields that will not necessarily apply in all cases. The field ‘research funder’ should be available to indicate impacts arising from research which was supported from general university funds.

75. Are the additional data to be used post-REF assessment research purposes only? Or will all or some of the data be used by the panels during the assessment? The two scenarios are very different – the guidelines need to be clear on this point.

76. We strongly oppose any proposal that requires the main narrative section of the case study to be entered directly into an online portal. This will increase burdens locally – as it is much harder to co-author material, and manage version control, in such a system. It is also likely to make the narratives harder for panels to read as online systems are usually far less flexible in terms of formatting or the ability to include appropriate graphical representations or images. The narrative should continue to be uploaded as a separate file, in the same way as e.g. the case for support in the Research Councils Je-S system.
**Question 28:** What comments do you have on the inclusion of further optional fields in the impact case study template (paragraph 97)?

77. Further optional fields may be desirable to improve analysis of factors such as impact categories and types of impact pathway. However, an optional – and therefore almost certainly partial – REF dataset may be of limited use as a basis for future research and analysis. It would seem better to agree on some additional mandatory fields (Q.27) providing the collection burden is reasonable and justified, and pilot these. One could take the opportunity to harmonise pathways and impact type data, for example, across the funding bodies and RCUK.

78. If it is decided in the end to provide for optional fields, then no implication should be drawn where an HEI does provide such data – and therefore optional further information (or the lack thereof) should not be made available to panels.

**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?

79. We believe this is a sensible change, which will better reflect the way impact arises in practice. However, some care will need to be taken in implementing the proposal:
   a. The level of excellence of the underpinning research must be demonstrated.
   b. It is important that linking impact to a ‘body of work’, rather than to a specific output, is not used to extend (earlier) the eligibility period for the underpinning research (i.e. where the key output dates from before 2000, but ‘follow on’ work extends into the period 2000–2020).
   c. There must continue to be a demonstrable link to research undertaken in the submitting unit: concepts such as a research group’s ‘expertise’ (consultation, para. 99) must be treated with caution, to ensure it is derived from the group’s own research, rather than simply their accumulated knowledge of the field. A number of references to the group’s outputs relating to the field in the appropriate time frame should be required in order for the panel to assess that expertise derives from their own research.

80. In reality, broadening the qualifying research activity in this way is likely to be more applicable to some classes of impact/routes to impact than others (e.g., policy impacts, where it can be challenging to establish a ‘causal’ link from a single output). Clear guidance from relevant panels about when it is applicable, and the type of evidence they expect to see, will be important.

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

81. 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?

82. As the REF is designed to assess research ‘excellence’, we agree with the principle that research underpinning the impact case studies should meet a minimum quality threshold (we note the similar policy focus on the part of Research Councils, such as the BBSRC ‘Excellence with Impact’ initiative).

83. In general, we believe the 2* test in REF 2014 was understood, and generally worked well for most panels. Establishing an agreed definition and understanding of ‘rigour’, and separating it out from the originality and significance of the research, will require considerable effort – and impose another learning curve on the sector. **As we argue in Q1, continuity is key to reducing burdens.**

84. We believe that in most cases, it should still be possible to identify an output from the broader activity or body of work that can be used to demonstrate that the underpinning research meets the minimum (2*) quality threshold. The only change that is required will be how panels view the supporting evidence: it is intended to be a proxy indicator of quality, rather than demonstrating a causal (and linear) link from that output to the impact.

**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?

85. **We do not support this proposal.** It would massively increase the volume of material that we need to upload to the submission system (rather than simply making it available on request, if a given case study is selected for audit). It may also reduce the willingness of companies to provide commercially sensitive information. It will add to Panel and secretariat workloads.

86. The guidance for REF 2014 drew the appropriate distinction between ‘assessment’ evidence – i.e. the data/testimonies you include in the case study itself to ‘demonstrate’ the impact – and ‘audit’ evidence (third party evidence which provides independent verification of the claims made in the case study). When they feel it is desirable to request additional information, Panels should do so.

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

87. Whilst indicative guidelines may be helpful, they should not be prescriptive nor seek to be exhaustive; nor should quantitative evidence be mandatory. Either approach would increase the burden on end users and other impact intermediaries – and may reduce the number willing to participate in case studies. Some third parties were not prepared to allow data to be used in REF 2014 (on grounds of commercial sensitivity) even where they had much greater control over the data format. (Manville et. al.’s (2015) report to HEFCE commented (i) some types of impact were difficult to measure and evidence and (ii) the lack of records meant that evidence often had to be
reconstructed. In addition, there was a perception among HEI staff that research users did not trust the confidentiality arrangements that had been put in place by the HE funding councils.)

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

No.

**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?

88. It is important that ‘continuations’ of impacts returned to REF 2014 can also be submitted to REF 2021. The case studies provide valuable evidence to government not only of the impact that arises from investment in research, but how it arises. HEIs must therefore retain the opportunity to present evidence, via the REF, that demonstrates the long-term (and often non-linear) nature of the ‘impact process.’ Nevertheless, we recognize that it must be new impact, realized since REF 2014 that is evidenced in the case of a resubmission.

89. There is a good case for an indicator to show whether a case study is a ‘continuation’ or an entirely ‘new’ example of impact – which could simply be a checkbox in the online element of the form. Arguably, the significance of the impact that has occurred in this REF period is related to the position at the start of the period: so one would reasonably expect a case study that can demonstrate a delta change in the nature or scale of the impact between 2013 and 2020 to score more highly than one that describes ongoing ‘business as usual’ impact. We assume there is no requirement to show ‘additionality’ in the underpinning research; a clear statement to this effect in the panel guidelines will be helpful, in order to avoid any misunderstandings.

90. We do not believe there is (yet) a case for a ‘cap’ on the proportion of case studies that are continuations from REF 2014. First, the fact that the eligible timeframes for both the impact and the underpinning research have rolled forward will naturally mean that some REF 2014 case studies no longer qualify. Second, we don’t know how HEIs will behave in REF 2021: some people contend that UOAs will have ‘used up’ all their strong case studies in 2014, and therefore assume a high-degree of resubmission; others argue that following the learning curve for REF 2014, many HEIs now have well established systems and processes in place to track impact, meaning they will be able to draw on a much wider pool of potential case studies in REF 2021. We need to see what impact looks like in the second REF in order to determine whether or not limits or quotas should be set for the third REF; we should not unduly constrain ourselves at this point.

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³ https://www.semanticscholar.org/paper/Preparing-impact-submissions-for-REF-2014-An-Manville-Jones/cc4eaf6e6a783f647fd2c4316c293711636f453
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?

91. We are cautious and would, at a minimum, wish to see this examined during the proposed Spring/Summer pilots.

92. It is not clear whether the main panels and sub-panels would (a) each pre-define the quantitative data they are seeking or (b) invite UOAs and HEIs to provide quantitative data they feel is most relevant. Approach (a) might be said to lead to consistency, providing the pre-specified data are available, however it risks encouraging behaviour designed to optimise those particular numbers, rather than incentivising a range of approaches that are best suited to a unit’s individual circumstances. Approach (b) would allow a more individualised return reflecting local priorities and evidence gathering.

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

93. No.

**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?

94. This was an element in the REF 2014 (separate) environment and impact templates and would be again in the next REF combined environment and impact template. We would welcome clear guidance as to what is meant by collaboration beyond HE in REF terms.

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

95. No. The REF should not be used as a regulatory or compliance tool as this undermines its focus on research excellence. Pursuing open access must not be allowed to compromise the quality of submissions in the next REF. Research outputs should be judged solely on their own merits.

96. There are myriad and different open access expectations and policies (from funders), and a variety of approaches that are consistent with the spirit of making research readily accessible (e.g. green open access via institutional repositories or discipline-specific repositories such as arXiv) but not necessarily compliant with the letter of HEFCE’s preferred policy. Until there is a single, agreed standard for open access – which allows efficient, ‘one-time, all-purposes’ compliance for a given output – any specific assessment element in REF will simply lead to increased burden on HEIs and individual researchers.
Question 37: What comments do you have on ways to incentivise units to share and manage their research data more effectively?

97. We do not regard the REF as the appropriate vehicle to ‘incentivise’ such activity.

Institutional-level assessment

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

98. We support in principle the notion of an institutional-level environment and impact support statement that reflects the strategy, support and actions of the institution as a whole. Such an institutional-level statement may reduce some burden, or at least avoid the repetition of generic ‘institutional-level’ text in UoA-level statements.

99. However, this change to the REF will require careful piloting. It is not yet clear where such statements would be best assessed, e.g. by a separate (special) panel or the Main Panels. The various options should be trialled during the pilot. Similarly, the pilot should further examine how the assessment scores should be used – the approach preferred by many in the sector is that rather than provide a separate sub-profile, the institutional level assessment would inform each UoA sub-profile. If the revised pro forma will provide less material/evidence for the panels, will they still feel able to make a sound assessment?

100. The case made for even piloting institutional-level impact case studies is unconvincing. The Stern Review recommendations provide little indication of what these would be, other than that they should “arise from multi- and inter-disciplinary and collaborative work, which could cross several Units of Assessment”. However, the REF already recognises interdisciplinary working and collaboration, wherever it occurs – within UOAs, within HEIs, across HEIs and between the HE and other sectors. The Stern Review Report itself noted that interdisciplinary contributions to impact case studies featured strongly. Initial analysis for HEFCE suggested that around 70% of case studies were underpinned by interdisciplinary work. The King’s College London and Digital Science analysis of non-redacted impact case studies submitted to 2014 REF reported ‘The research underpinning societal impacts is multidisciplinary, and the social benefits arising from research are multi-impactful …multiple [fields of research] underpin the case studies, leading to multiple types of impact.’

10 The introduction of institutional case studies would add cost and burden as guidelines are written and everyone seeks to understand what they are, how they will be assessed, and how they interplay with UOA case studies (in terms of type, number and weighting).

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

101. As noted above (cf. Q38) we are not entirely convinced that a separate panel is necessary or desirable to review the institutional-level templates. The pilot should explore different approaches.

102. The pilot needs to address the need for diversity in the sector. A panel focussed solely on institutional templates may implicitly, sub-consciously even, have in mind certain models of what it is expecting an HEI to do (and norms thereof). There should be no ‘one-size-fits-all’ model, including in relation to organisation, governance, academic support and professional services’ models. Any pilot should include different HEI structures and sizes and build on the experiences of panel members from REF 2014.

103. The pilot needs to examine whether there should be a separate weighting for institutional-level assessment, and if so what that weighting should be and the implications for allocating QR.

**Outcomes and weighting**

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

104. We do not support the proposal to include institution-level impact and environment scores within the UOA-level profile calculation. It would lead to UOA profiles being influenced by factors that are outside the submitting unit’s control and, potentially, a function of entirely different disciplines. At a macro (UK) level, this would distort assessments about the health of a given discipline; at a local (HEI and unit) level, it would weaken the ‘accountability’ aspects of the REF. Furthermore, one of the suggestions in *The Independent Review* Report was that the institutional elements could inform a separate, ‘strategic’ allocation to HEIs to support multi-disciplinary or HEI-wide initiatives. This would be harder to effect if institutional results are rolled into the subject profiles.

**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?

105. Yes. We note that by removing the impact template and (potentially) reducing the number of impact case studies in each submission, the de facto weighting for each case study will be higher than in REF 2014 – even if the overall weighting for impact remains at 20%.
**Question 42:** Do you agree with the proposed split of the weightings between the institutional and submission-level elements of impact and environment?

106. We have argued that it is not necessary or desirable to introduce institutional impact case studies (cf. Q.38).

**Proposed timetable for REF 2021**

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

107. The timetable is very tight but pushing back the date for 2nd REF is not desirable.

**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?

108. The concentration of outputs and therefore UoAs at the top of the excellence rating scale needs to be addressed in some form, either by expanding the scale or in a tightening of the definitions of world-class. In the 2015 draft consultation document prepared by the funding bodies, but not finalised and published in light of the setting up of The Independent Review of the REF, the funding bodies were set to ask ‘whether the 4* quality level should be split into two, to better reflect the panels’ ability to make more granular judgements at this quality level …’ [emphasis added].\textsuperscript{11} Paragraph 107 of the draft commented ‘In assessing submissions and applying the criteria, panels … noted that the scoring scale did not provide sufficient room to reflect the more granular judgements they were able to make.’ \textbf{It is not known why the current Consultation fails to address this issue.} There is a very significant risk that panels will be limited in the granularity of their assessment, plus – as the draft Consultation paper itself noted – there will be little room for UK research to demonstrate continuing improvement.

\textsuperscript{11} The funding bodies draft noted ‘… we are considering the arguments for and against dividing the 4* category in to two – this could be, for example, by having a 4* and 5*, or 4b* and 4a*. Where a division of the 4* category is made, it would apply across all three elements of the assessment. We welcome views on this proposal.’