

## **UNIVERSITIES UK RESPONSE TO THE UK FUNDING COUNCILS CONSULTATION ON THE SECOND RESEARCH EXCELLENCE FRAMEWORK**

### **KEY POINTS**

- Universities UK (UUK) welcomes the recognition by the funders that the Research Excellence Framework's (REF) primary focus is identifying research excellence, and is not intended to become an audit of all research produced in UK universities.
- We strongly support an overall continuity of approach with REF 2014, wherever possible.
- We support the principles set out by Lord Stern and the direction of travel that his review set out for research assessment. However, work needs to be done to ensure that the additional burden of any changes is proportionate to the perceived benefits, and that those principles can be operationalised in a coherent and effective way.
- We strongly urge the funding councils to reconsider the proposals regarding the use of existing data to identify research active staff, and to allocate staff to Units of Assessment (UoAs). Institutions should retain some autonomy in deciding the UoAs to which they make returns and in allocating staff to UoAs, based on transparent and robust processes. Defining the baseline of research active staff will also require institutions to exercise a degree of judgement.
- The benefits of decoupling outputs from individuals are recognised, and the flexibility should support more inclusive returns. However, in light of our proposal to retain a degree of institutional autonomy over the identification and allocation of research active staff, we suggest that the minimum number of outputs should be set at 1. The maximum of 6 is reasonable and we support the proposal.
- UUK recognises the challenges that portability of outputs has caused for institutions and is therefore supportive of the principle of non-portability. However, there are substantive issues that remain to be clarified if the consultation proposals are to be operationalised effectively. In particular, the impact on early career researchers and those who have already moved institution in the current REF cycle would need to be mitigated.
- The submission of institutional level case studies should not be introduced as a requirement in the current exercise.
- Given the point in the REF cycle at which institutions find themselves, the rules and guidance must be clarified as a matter of urgency.

## **ABOUT UNIVERSITIES UK**

Universities UK is the representative organisation for the UK's universities. Founded in 1918, its mission is to be the voice for universities in the UK, providing high quality leadership and support to its members to promote a successful and diverse higher education sector. With 135 members and offices in London, Cardiff (Universities Wales) and Edinburgh (Universities Scotland), it promotes the strength and success of UK universities nationally and internationally.

**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?**

Yes, UUK supports an overall continuity of approach with REF 2014, wherever possible. Stability in the participation mechanisms for REF is more important than ever, considering the substantial challenges and uncertainty arising in the wider research environment since the Stern review occurred. Moreover, only an incremental approach to REF reform can reconcile the Stern review's aims of retaining the strengths of previous exercises and mitigating the burden of REF. Continuity in the REF's peer review-centred assessment process is particularly welcome. Given the point in the REF cycle at which the sector finds itself, it is imperative that guidance on the specific rules to be put in place, and any changes from the previous exercise that are to be implemented, are provided as a matter of some urgency. Consistency with the previous exercise will, of course, minimise the potential difficulties that may be faced in responding to the exercise in an effective manner.

UUK supports the principles set out by Lord Stern and the direction of travel that his review set out for research assessment, and we welcome the opportunity to help shape these in a constructive manner. We strongly endorse the principles of lowering the burden on both individuals and institutions where possible, and the objectives to both incentivise and recognise long-term investment in staff and the research environment. We also strongly support actions that will increase the transparency of decision making at an institutional level and reduce what is perceived to be unhelpful 'gaming' of the process.

However, we believe that work needs to be done to ensure that the additional burden of any changes is proportionate to the perceived benefits, and that the principles set out above and through this consultation can be operationalised in a coherent and effective way. Therefore, in our response below (questions 7 to 9), we strongly urge the funding councils to reconsider aspects of the consultation proposals, notably regarding the use of existing data to identify research active staff, and to allocate staff to Units of Assessment. There is, we believe, a sound argument for using existing data as baseline for submissions; however, this should act as a guide only, from which institutional judgements will need to be made to ensure that staff being returned through the exercise are genuinely 'research active', and that the overall cost and burden of the exercise do not exponentially increase. For their part, institutions must provide clear and robust justification for the judgements and decisions that have been made against this baseline.

In this way, we see the revised proposals set out below of meeting the requirement to maintain overall consistency with REF 2014 while working towards a more inclusive exercise that continues to recognise and reward excellence wherever it is found. This is, we believe, in the interests of all stakeholders, and reinforces the welcome recognition that the purpose of the UK's research assessment processes is to support the effective distribution of QR funding, and is not a comprehensive audit and assessment of all research activity.

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

Thanks to the welcome simplification in REF 2014, the current Unit of Assessment (UoA) structure is broadly fit for purpose and well understood by higher education institutions (HEIs). We believe this should be retained in REF 2021, so that it can become further embedded and avoid generating additional burden.

Nevertheless, we encourage the Higher Education Funding Council for England (HEFCE) to consider other ways of addressing the issues raised by institutions regarding the fitness for purpose of specific UoAs, and the impact of the UoA structure on interdisciplinary research (IDR) and the visibility of disciplines. This includes testing the proposals outlined in paragraph 29 of the consultation, but also potentially less burdensome options, such as ensuring these aspects receive appropriate consideration retrospectively in the sub-panel reports.

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

We support this proposal, provided that it can be made compatible with the early appointment of a sub-set of sub-panel members alongside the chair (see answer to 3b).

Joint development of the submission guidance and panel criteria would give HEIs more clarity on the parameters of the assessment, and improve consistency between the two documents. However, if combined with the late appointment of all sub-panel members except the chair, this may reduce sub-panels' ownership of the assessment criteria, to the detriment of robust peer review. For this reason, we think this change is worth pursuing only if it will not require postponing recruitment of all sub-panel members (as suggested by question 3b).

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

We would not object to the later appointment of some sub-panel members, if this helped accelerate the joint development of the submissions guidance and panel criteria. However, we would prefer a compromise solution between the current arrangements and the ones proposed in paragraph 32, that could minimise the risks of reduced ownership of criteria by sub-panel members. For example, a core set of sub-panel members could be appointed alongside the sub-panel chair, and complemented by additional recruits nearer to the start of the assessment year. This would ensure that sub-panel members (not just the chair) can take time to consult with their subject communities, be involved in the development of the sub-panel criteria, and learn to work together. This also helps the recruitment process in that

it allows the appointed sub-panel members (particularly research users) and their organisations plan for their absence.

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

Yes, UUK supports the drive to improve representativeness on the REF expert panels, including through the proposals in paragraph 35.

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

We support maintaining the current approach to nominating panel members in the next REF (as outlined in paragraph 36), complemented by the Equality and Diversity measures suggested in paragraph 37.

Even if we see the merits of an open nomination process, particularly in terms of increasing equality and diversity, the representation of disciplines and the range of expertise on the (sub-)panels, we are concerned about the workload associated with a nomination approach accepting self-nominations. Additionally, we believe it remains essential for candidates to have the support of their respective subject communities, something which is most effectively guaranteed by the current nomination approach.

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

Yes, we support this proposal as a way of strengthening equality and diversity measures within the current nomination mechanisms (see our answer to question 5a).

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

We do not have specific comments on the list.

**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?**

UUK strongly urges that the proposal to use Higher Education Statistics Agency (HESA) cost centres is not taken forward. While recognising the desire to deliver on the priorities set out by Lord Stern (and endorsed by UUK, see response to question 1) in a way that minimises the burden to all parties, extensive engagement with UUK members and other stakeholders indicates that this data is wholly inappropriate for the stated purpose. Using this approach would create significant issues for all institutions, as cost centre data does not identify the

areas in which an individual academic will be working, and makes interdisciplinary outputs particularly problematic. In a survey of UUK members (56 respondents) no institutions endorsed the proposal to use cost centre data.

There is, at present, no independent dataset that can be used for this purpose. It is our view that institutions will, therefore, need to retain autonomy over (a) the UoAs to which they make submissions and (b) how the relevant staff (see Q8) are allocated to UoAs. The funding councils should work with the community to articulate clear guidelines for how staff are allocated to UoAs, with the expectation that the strategies and approaches used by institutions are open and transparent. One mechanism might be for institutions to set out their approach in the REF submission intentions survey, articulating the criteria on which they will make judgements (see also question 8). A short statement of the identification and allocation of staff to UoAs might also be included as part of the institutional-level environment template, to enhance transparency and accountability.

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

As with the proposal to use HESA cost centre data, we recognise that the overriding objective of the proposal set out in the consultation is to deliver an effective and low-burden mechanism for identifying research active staff. This consideration is welcomed by UUK.

However, as with the cost centre data, the HESA staff record does not, as it currently stands, provide an effective mechanism for identifying all staff who may be appropriately classified as 'research active'. As the consultation notes, the proposal would include research assistants (RAs), and as such would already require steps to be taken to evaluate the contribution and independence of RAs to determine their eligibility, presupposing the use of institutional judgement in this space. Evidence submitted to the consultation by the Universities and Colleges Employers Association (UCEA) sets out in detail the issues with using the HESA staff record as it currently stands. This would lead to the inclusion of academics whose contracts refer to research regardless of whether they undertake, or are expected to undertake, any research activity. Contracts of staff in post-92 institutions in England and Scotland may refer to research and/or scholarship regardless of whether this is, in fact, one of their responsibilities.

For the purposes of the REF 2021 exercise, we therefore feel that institutions should retain a degree of autonomy to define research active staff. However, we would suggest that the process should be more open and transparent, and that institutions should account for their judgements as a key part of their submissions. For example, the overall number of research active staff as defined by the HESA staff record (along the lines set out in the consultation document) may be used to identify a baseline of the possible cohort of research active staff at institutional level. Submissions should then note the deviation from this baseline at institutional level, and the processes and criteria through which staff have been (a) identified as research-active and (b) then been allocated to UoAs. This could be addressed though

either the submission intentions survey, or as a statement in the institutional-level environment template. Guidance from the funders, developed in consultation with the sector, on a common set of expectations and/or processes to be followed in arriving at institutional judgements and clarity of the required transparency would be needed.

We believe that the HESA staff record might benefit from revision in the future so that both contract type and core activity are properly captured. This would enable future activities to draw on a common dataset with an agreed set of definitions. This is, however, a long-term goal, and would be extremely challenging to implement ahead of the REF 2021 exercise. UUK would welcome the opportunity to work with relevant stakeholders to support such a revision to the staff record.

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

Overall, we support the decoupling of outputs from individuals. However, we suggest some revisions to the proposals, based on our view that – for the REF 2021 exercise at least – a significant degree of autonomy and institutional judgement must be retained. In summary, if institutions are required to make decisions over the inclusion of staff (due to the issues raised in relation to the available data sets), then we would support a minimum of 1 output, a maximum of 6, and an average of 2 per person. The flexibility with regards to the range of outputs submitted reduces the requirement for special circumstances.

However, we would also note that the selection of the highest quality outputs, decoupled from staff, will lead to a significant increase in the burden on institutions. This increased burden will need to be acknowledged when setting the guidance for the activity.

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

In the expectation that submissions will include more staff than previous exercises, we support the proposal to allow a range of outputs to be submitted, with an average of 2 per returned FTE. However, this may need to be reviewed once a better understanding of the overall burden is known, which will require further modelling to be undertaken by the funders. However, we do note that there is a strong case for reducing – rather than maintaining – the overall burden on panels (in terms of number of outputs submitted), given that the administrative effort of identifying outputs (rather than individuals) will increase for institutions.

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

We support the proposal to set six as the maximum number of outputs for each member of staff.

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

Given that, in our response to question 8 we argue that institutions must retain a key role in defining the cohort of research active staff (in line with any guidance developed by the funders), it seems appropriate that the minimum number of outputs should be one. While setting the minimum number to zero would significantly reduce the burden, it may also present new challenges, such as ensuring that all included researchers are genuinely research active. We also consider that there would still need to be some mechanism for reporting and accounting on, for example, equality and diversity issues, to ensure that the progress made over previous exercises is maintained, hence the potential to reduce the overall burden may be overstated.

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

On balance, UUK recognises the challenges that portability of outputs has caused for institutions and is therefore supportive of the principle of non-portability. However, there are a number of substantive issues that remain to be clarified if the proposals set out in the consultation are to be operationalised effectively. In particular, the impact on early career researchers and on those who have already moved institution in the current REF cycle would need to be mitigated.

#### **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?**

Acceptance for publication may not be appropriate for all types of publication, as recognised by the consultation document, and for outputs in certain disciplines. For example, within the humanities, acceptance for publication of major monographs may (in some cases) be years before the publication date – or be very difficult to identify at all with any degree of consistency. As such, this does not provide a universal mechanism for appropriately identifying the place where the substantive research underpinning an output has taken place.

Beyond publications, the issue of date of publication becomes moot: for example, in some cases, institutions reported to UUK that significant proportions of their submissions (more than one-third of their outputs) were not publications, with submissions including a range of material such as installations, performances and the built environment. Identifying suitable eligibility criteria in such cases is extremely difficult, and there is no clear ‘one-size-fits-all’ model that might be applied.

Further work is needed to identify adequate marker(s). It may be that flexibility is required, for example at main panel level or UoA level, to determine what the appropriate cut-off points for different disciplinary settings, or for different types of output. This would, however, increase the complexity of the exercise and impose an additional burden on institutions, which would need to be fully understood if implemented.



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

UUK member feedback suggests that identifying the eligibility of outputs would significantly increase the administrative burden of the exercise.

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

Generally, the non-portability of outputs may have an impact on certain communities of researchers (such as early career), and may also impact on disciplines in a differential manner (see for example our comments on question 10a).

For early career researchers, allowing outputs from research-active staff that have not been submitted to a previous REF exercise to be double-counted by both the original and new institution could ensure that (a) early-career researchers are not disadvantaged and their potential opportunities for recruitment and advancement are supported, (b) that the original institution is still able to receive credit for investment in the individual and the outputs produced and (c) any disincentive to publish is mitigated. Double-counting outputs in such limited cases would reduce the burden of the exercise on stakeholders; indeed, double-counting of outputs already occurs where, for example, a publication has been co-authored by academics working at different UK institutions.

We would also note that both institutions that have already recruited new academic talent during the current cycle, and researchers themselves that have already moved institution, may also be disadvantaged if proposals on the non-portability of outputs are enforced retrospectively. In order to mitigate this, funders may want to consider whether outputs should either be portable, or be similarly double-counted, for all research-active staff that moved to a new institution before confirmation of the non-portability requirements. For example, a deadline of 1 August 2017 might be chosen for the current REF 2021 exercise, beyond which any future mobility would be subject to the agreed rules on non-portability.

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

Sharing outputs proportionally across institutions could lead to a significant administrative burden, and may lead to conflicts between institutions over the substantive contribution to specific research outputs. If non-portability is to be implemented, we would support the approach set out in our response to question 10c: that outputs may be double counted for early-career researchers and for those staff that have already moved during the current REF cycle, up to a hard deadline of, for example, 1 August 2017.

**Question 11: Do you support the introduction of a mandatory requirement for the Open Researcher and Contributor ID (ORCID) to be used as the staff identifier, in the event that information about individual staff members continues to be collected in REF 2021?**

Yes. There are benefits to the use of the ORCID identifier beyond the REF exercise, and including as a requirement here would ensure that the system is embedded in the community.

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

On balance, we would accept this proposal in light of the small numbers of staff involved (less than 1% of staff submitted to REF 2014) and the significant burden of justifying their inclusion in REF. We note, however, that a small number of institutions place significant value on the opportunity of submitting category C staff. This can help demonstrate collaboration with NHS partners and other organisations, showcases the contribution of, for example, Emeritus professors. The impact of removing Category C staff must be considered by the funders, and whether this is consistent with developing agendas that will place significant emphasis on collaboration between universities and partners beyond academia (for example, through the Global Challenges Research Fund and the proposed Industrial Strategy Challenge Fund).

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

We would welcome a clarification of the definition of research assistants used in REF 2014<sup>1</sup>, as this seemed to create uncertainties in the eligibility of research-only staff across departments and institutions. In particular, subject-level differences in what constitutes a principal investigator on a 'significant piece of research work', made it difficult for institutions to apply that single definition (and related exceptions) confidently and consistently across submissions. We would also support extending the definition through a set of 'independent research' tests and examples to guide its application across disciplines, particularly in the absence of clear markers such as being a principal investigator on an external research grant (as is more frequently the case in the arts, humanities and social sciences). Such extensions to the definition could be informed by the tests and examples already developed by institutions internally.

We also note that Lord Stern's recommendation to include all research-active staff in REF 2021, if implemented, will make it even more important to get the definition of 'independent research' right. Submitting all research-only staff to REF (regardless of their independence) would have a huge impact on the size of some submissions and the volatility of staff

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<sup>1</sup> Paragraph 80, REF 2014 Assessment Framework and Guidance on Submissions

numbers, as well as make the selection of outputs for REF 2021 more burdensome. Without mitigation, this would also create issues of fairness, as there is currently no expectation on the part of non-independent research assistants to publish. However, the impact of this proposal would be significantly lessened should the approach articulated in our response to questions 7-9 be implemented.

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

We agree with the proposal to require institutions to submit a short statement outlining the connection of staff on fractional contracts of 0.2 FTE or higher to the submitting unit. This is line with the Lord Stern review's aim to reduce gaming, which UUK supports. This requirement should be complemented by appropriate guidance on what constitutes relevant information for the statement.

The risk of gaming that may come with making staff on fractional contracts eligible for REF often overshadows the essential role this can play in encouraging staff mobility and collaboration with industry, both of which support a vibrant research environment. In the arts, humanities and creative industries, fractional appointments are commonplace. In this context, treating them as 'red flags' unless proven via the statements is particularly inefficient and may even deter this beneficial practice. To mitigate this, HEFCE might therefore consider requiring those statements only for recently appointed staff on fractional contracts (eg less than 2 years at the census date), or staff with other appointments outside the UK.

The minimum of 0.2 FTE (equivalent to 1 work day a week) also seems sensible, in that it allows meaningful individual contributions to the research unit to be submitted to REF, without discriminating against researcher-practitioners and flexible workers.

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

Collaboration could be more explicitly recognised in the environment section if this included a specific question regarding the institution/unit's success and strategies in this area, requiring submission of broader evidence than that already required in the current template (eg HESA research income from industry). It is important that this additional evidence covers a range of quantitative indicators that institutions already collect (as opposed to a new, single indicator) and can be complemented by a narrative element. This is to reflect the incompleteness of any single measure in capturing the breadth and depth of collaboration and mobility, and the need to set this information in the context of the HEI's strategy and institutional/local/discipline-specific characteristics.

**Question 16: Do you agree with the proposal to allow the submission of a reserve output in cases where the publication of the preferred output will postdate the submission deadline?**

Yes, we support this proposal, as it will help all institutions manage the risks of submitting outputs whose main authors or co-authors are based in other HEIs.

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

We agree with these measures, which build on the welcome incremental success achieved by REF 2014 in encouraging and rewarding IDR outputs, and preserve continuity in the assessment system. We do, however, recognise that there are opportunities for HEFCE to take support for IDR a step further in the longer term. The newly established IDR advisory panel is welcome; details of how this will support judgements across the REF panels should be provided at the earliest opportunity.

We also welcome the appointment of IDR champions. It is essential that their experience reflects a wide breadth of disciplinary expertise and that they receive the training and support they need to advise panels on the assessment of IDR outputs.

We support the inclusion of a mandatory tick box for IDR research, noting that implementing this successfully also requires:

- a clearer definition of IDR and clearer statement that IDR research is welcome and actively encouraged
- clear guidance on when outputs should be marked as IDR, and what process these outputs will go through
- an understanding of how the panel system might deal with a significant increase in cross-referrals, if this will be the designated process for assessing outputs marked as IDR (and if, as could be expected, several more outputs will be marked as such in REF 2021 compared with REF 2014)

The inclusion of an explicit section in the environment template to detail structures in support of IDR is also welcome, provided that this will be flexible enough to accommodate differences across the discipline spectrum in how IDR occurs and should ideally be supported.

**Question 18: Do you agree with the proposal for using quantitative data to inform the assessment of outputs, where considered appropriate for the discipline? If you agree, have you any suggestions for data that could be provided to the panels at output and aggregate level?**

Yes. We welcome an approach that includes metrics as a tool to support quality judgements, and ensures the assessment process remains flexible enough to respond to advances in the measurement of research performance. The REF's current assessment process, founded on the primacy of peer review informed by discipline-appropriate metrics, has proved effective and should continue. We support efforts to explore the potential use of new metrics by panels, including field-weighted citation impact and citation percentiles, with three important caveats:

- Any additional metrics should be considered at the level of individual outputs and not at the aggregate level, as such use of citation data would be flawed.
- Panels should also be provided with contextual information that enables them to assess the citation performance of a given output within its specific discipline, if this is not implicit in the measures themselves.
- Transparency in the use of metrics by panels, and their relevance to discipline, remain paramount. In particular, any new arrangements should take into account the significant risks of using metrics to judge excellence in panels C and D and on IDR outputs.

We welcome HEFCE's commitment to working with the Forum for Responsible metrics to address these and other issues regarding the use of metrics in future REFs. We would also endorse the more detailed evidence submitted to HEFCE by the Forum, which can be found at:

<http://www.universitiesuk.ac.uk/policy-and-analysis/Documents/forum-for-responsible-research-metrics-response-to-REFconsultation2017.pdf>

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

Yes, we strongly agree with maintaining consistency in the impact assessment process, where possible. As shown by Technopolis's review of the costs and burden of REF 2014, HEIs have invested significant resources in preparing for the introduction of REF impact assessment. Enabling them to capitalise on that experience is the best way to improve the efficiency of REF (as changes would generate further adjustment costs) and encourage submission of a broader range of a more robust, well-evidenced, research impacts than in REF 2014.

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

We welcome the broadening and deepening of the definition of impact and the clarification that academic impacts outside the field, and impacts on teaching, public engagement, and cultural life, can be covered by the case studies.

While helpful, this would work best if accompanied by further guidance for sub-panels and submitting HEIs on what constitutes appropriate supporting evidence for these impacts, and how the criteria and definitions should be understood and applied. We understand that uncertainty on these issues was the main barrier for HEIs to submitting these types of impact in REF 2014, rather than their lack of awareness that they would be eligible. We agree that the definition should exclude ground-breaking academic impacts, which are best assessed through the output or environment element of the REF.

However, as with other areas of the consultation, support and guidance over the definitions is needed as a matter of urgency. Institutions are already developing their potential impact case studies, and as such need clarity over the parameters by which it will be evaluated.

**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?**

We support aligning the definition of academic and wider impact between the funding councils and RCUK. The consistent use of definitions across funders will help foster a common understanding of research impact in the academic community. Once set up, UKRI should work with other funders to refine this definition, particularly to clarify what qualifies as ‘ground-breaking’ impact and further articulate impacts on education and training.

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

Reach and significance remain appropriate parameters for assessing research impact. However, operationalising and evaluating these criteria consistently has been a challenge for REF 2014 panels. Understanding of these concepts varied across disciplines, types of impact and even geographically; reach and significance were also difficult to separate in practice, and the relative importance of the two in the judgements was unclear. Further guidance and examples could help foster a more consistent and balanced application of these criteria.

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

We would support further guidance on public engagement impacts, and would urge the funders to work closely with the NCCPE in developing this.

**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?**

We think this is appropriate, as it maximises the incentive for institutions to make long-term, strategic investments and fully develop non-academic research impacts. Still, work should continue on developing guidance that clarifies eligibility in ‘grey areas’, such as when staff move across multiple institutions while the impact was being developed, or impacts developed in collaboration with other partners.

**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?**

UUK welcomes the merging of the impact template into the environment section as a way to reduce duplication and better reflect institutional strategy formulation mechanisms. This is an appropriate mechanism for recognising and incentivising a strategic approach to supporting impact. We recognise that strategies for enabling research impact should have a distinct place within the environment template, as distinct from the excellence of the impact generated, which remains best assessed via the case studies.

**Question 26: What comments do you have on the suggested approaches to determining the required number of case studies? Are there alternative approaches that merit consideration?**

We agree that HEFCE’s approach to changing the required number of case studies should prioritise:

- maintaining the volume of case studies at a similar level as in REF 2014
- mitigating the ‘discontinuities’ ensuing from the staff FTE threshold approach used in REF 2014

The second objective would partially be met by introducing universal submission of research-active staff, and we believe that the more inclusive approach set out in our answers to questions 7-9 would also mitigate the potential for case study requirements to drive selection criteria.

At the same time, this move might fuel a rise in the volume of case studies, falling disproportionately on smaller submissions. Reducing the minimum requirement from 2 to 1 is a way of avoiding this; however, the implications of this on the identifiability of individual submission scores and the reliance of submission performance on a single element of impact are a concern. We therefore encourage HEFCE to explore solutions which combine widening (perhaps doubling) the case-study/FTE staff ratios with developing clear exceptions to the

current minimum requirement of 2 impact case studies for the smallest submissions (<5 FTE staff). If this is not sufficient to keep the volume of case studies under control, capping numbers for large submissions would also merit consideration.

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

Yes. We believe this helps with the assessment and audit of case studies.

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

We would support inclusion of further optional fields in the template, for example the name of the research funder (where applicable) and an interdisciplinary marker. In selecting these optional fields, HEFCE should consider what kind of information would be valuable to include for both research policymakers and HEIs under the aims of the REF, to avoid generating unnecessary burden for institutions. Keeping the fields to a minimum, issuing clear guidelines on their completion (eg when there are multiple funders), and clarifying that these will bear no effect on the assessment of the case studies will also encourage HEIs to volunteer this information.

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

We welcome this development, which we expect will broaden the range of impacts showcased in the case studies. Providing clear guidance and examples to submitting HEIs and the REF assessment panels will be essential for implementing this successfully. The guidance should cover unambiguous definitions of ‘research activity’ and ‘body of work’ (and their interpretation), and guidance on how ‘demonstrable quality’ will be assessed and the type of evidence required for demonstrating how impacts are connected with their underpinning activity/body of work.

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

Yes, the proposed timeframe is in line with the one provided in REF 2014, which has proved broadly appropriate. It is worth, however, exploring whether this provides a good enough fit with a broadened definition of eligible impacts relative to REF 2014, since a research activity/body of work can be developed over a longer period.



**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?**

UUK supports retaining a threshold criterion based on the originality, significance and rigour of the underpinning activity, with clear guidance on how these will be applied to research activities and bodies of work. We are unclear about the benefits of reducing the assessment to standards of rigour only, when continuity in the assessment criteria would offer more certainty and simplicity. If there is evidence that the quality threshold might work against the broadening of the impact definition, we think this would be best addressed by reconsidering the threshold itself (currently 2\* or above) rather than its underpinning criteria.

**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?**

For reasons of burden, we would prefer a more streamlined process for panels to request audit evidence retrospectively, to a requirement that this be provided by HEIs automatically alongside the case studies. The latter proposal would help speed up the audit phase but has implications on the administrative burden of impact submissions on REF panels and HEIs, as well as on the role of supporting evidence in the assessment (if not accompanied by clear guidelines on how it will be used). If this emerges as the preferred option, we see merits in testing this proposal as part of the scheduled institutional assessment pilots.

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

We support the development of guidelines for the use and standard of quantitative impact evidence, including for numerical standards. However, such guidelines may have greater value for the long term than for REF 2021, given that we are already in the middle of the next REF cycle. Given that many HEIs have already started collecting the evidence required for the next exercise, any guidelines for REF 2021 should at least be available as soon as possible and flexible enough to allow impact data already gathered to be brought up to the advised standard easily. It is essential that the impact guidance avoids conveying the message that quantitative indicators are always appropriate, and by nature superior to other corroborating evidence, a risk that is recognised in paragraph 107 of the consultation document.

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

As with other areas of the consultation, support and guidance over the grading of impact is needed as a matter of urgency. Institutions are already developing their potential impact case studies, and as such need clarity over the parameters by which it will be evaluated.

**Question 33: What are your views on the issues and rules around submitting examples of impact in REF 2021 that were returned in REF 2014?**

We strongly agree that institutions should be allowed to re-submit to REF 2021 examples returned in REF 2014, when these generate evidence of further impact, and without limits on the proportion of case studies that can be re-entered. This is necessary to avoid discouraging investment research activity with longer term, cumulative impacts. A ‘threshold’ approach seems the most appropriate for determining additionality, as it could accommodate differences in what constitutes ‘additional impact’ across disciplines. Clear guidance on re-submission of REF 2014 case studies should be issued as soon as possible.

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

Yes. We support the simplification of the environment element of REF submissions, including through increased use of data that is already collected by HEIs. Any changes should, as suggested in paragraph 113, be developed by HEFCE in close cooperation with the Forum for Responsible Metrics.

Increasing the use of data, however, will not completely address the challenge of comparing the contextual information included in the narrative element, which remains essential to assessing the research environment. To help with this, there may be merit in developing a more structured set of questions for the narrative elements (but still based on the questions listed in the REF 2014 guidance).

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

We recommend exploring the data already provided by HEIs as part of their regular reporting to the main research funders, which include information that is relevant to the quality of the research environment. These may include support for equality and diversity (Athena Swan) and outcomes from sector-wide researcher experience surveys (CROS, PIRLS and PRES).

**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?**

It may be useful to explore the inclusion of a range of indicators from the Higher Education-Business and Community Interaction Survey (HEBCIS) to complement the narrative element; however, this would require appropriate benchmarking at the institutional level. HEFCE's work on developing a Knowledge Exchange Framework for institutions may further help identify what data can be used to meaningfully represent a variety of collaboration types.

Some elements/types of collaboration are not well captured by HEBCIS measures (or any other survey-based/income-based measure of knowledge exchange) and will need to continue to have adequate space in the narrative element of the template ('collaboration and contribution to the discipline' section).

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

Encouraging HEIs to articulate support for open access (OA) as part of the environment element of REF could be valuable. However, we do not support the proposals for giving specific additional credit to units for their work on OA at this time. We believe progress on OA is best encouraged within the framework of the OA policies themselves than through incorporation in the REF process, also given that policy compliance falls outside the intended aims of the REF.

The guidance and OA requirements for the REF exercise are broadly understood and set a clear direction of travel for the sector. Significant work is also ongoing to build on the UK's success and leadership in open science through the Open Access Coordination Group and the Open Research Data Taskforce. These substantive activities will report in December 2017/January 2018 and provide mechanisms for further enhancing the take up of OA.

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

As with open access, evidence of commitment to and strategies for promoting open data (such as commitment to the newly launched Concordat on open research data) might best be referenced through the narrative elements of REF environment. However, we do not believe that the REF is an appropriate tool to drive compliance and incentives, particularly midway through the current cycle, in an emerging area such as open data. As noted in question 36, significant activity is underway at the sector level to support greater sharing of research data, building on the principles set out in the 2016 *Concordat on Open Research Data*. This, we feel, is the appropriate route for developing holistic approaches that will support better sharing of research data.

Funders may wish to make clear now any expectations that open data would be a requirement of future exercises. Also, any guidance would need to be sensitive to the very different understandings and levels of maturity regarding open research data across different disciplines. Differential approaches at main panel – or even UoA – levels may be required, even in future exercises.

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

On balance, we welcome the development of an institutional-level assessment of impact and environment, provided that clear guidance is issued regarding how the institutional and UoA-level environment data will work in combination, and how the panels will assess these two components. To uphold the principle of rewarding excellent research activity wherever this is found, there should be a strong incentive for panels to always consider the two jointly in their judgements, and the relationship between the UoA level submission and the overarching institutional environment. Consideration should also be given to how these institutional level elements will impact joint/cross-institutional submissions.

However, we do not agree that institutional-level impact case studies should be introduced as a requirement of the exercise, particularly in the middle of the REF 2021 cycle. The feedback we received from our members shows there is a lack of clarity about the rationale for introducing these case studies, and on whether these are designed to articulate IDR impacts, institutional/collaborative impacts, or both (as the two do not always overlap).

Questions were also raised regarding the additional burden generated by these case studies, as well as the tight timescales available for running a pilot. From a research unit perspective, a further concern is that this will encourage cherry-picking of the best UoA-level examples for institutional assessment, and/or how this will affect UoA-level impact performance.

To the extent that IDR/collaborative case studies are already abundant across UoAs and remain best assessed at that level, institutions could simply be required to flag case studies of this nature in their UoA-level submissions to REF 2021. A quota of 5% of their total volume of required case studies could be set as guide, to provide enough flexibility.

In any case, it remains essential that the introduction of these case studies will be supported by a clear definition of institutional impact, piloting, separate guidance and special arrangements for their assessment.

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

The timing of the pilot is a key factor. The pilot should start as soon as possible to enable timely issuance of REF 2021 guidance.

The pilot should explore:

- the format of the institutional impact case study template and requirements, if this proposal is introduced – including the burden of different case study number requirements and the weighting of this component in the overall profile;
- the relationship between the institutional and UoA-level environment information, particularly to assess where duplication is helpful the assessment process (and where it is not).

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

We support continuity in the weightings across the three elements assessed by REF, in line with Lord Stern's recommendations.

We question, however, whether attributing 5% of the impact weighting to institutional-level case studies in REF 2021 is appropriate. This is in line with our position in question 38, which sets out our reasoning for not supporting the introduction of institutional level case studies as a *requirement* of the exercise. Further, given the uncertainty over the parameters for identifying, articulating and evaluating institutional-level impact, this seems to pose too great a risk. The potential impact on smaller institutions (who would see 5% of their score determined by one case study under the proposals in paragraph 119) also needs to be considered. We urge HEFCE to consider this issue as part of the institutional-level pilot.

**Question 41: Given the proposal that the weighting for outputs remain at 65 per cent, do you agree that the overall weighting for impact should remain at 20 per cent?**

Yes, we support this proposal, noting that the inclusion of an impact element in the environment weighting will increase the significance of non-academic impact while ensuring some continuity in the assessment process.

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

No. We suggest that the weighting of the institutional level elements be reduced from 7.5% to 5% for REF 2021.

We question whether institutional and submission-level elements should receive equal weighting, as this is likely to reduce the assessment system's ability to identify pockets of excellence. Even if an equal split was widely accepted in principle, we would still see a benefit in a more gradual approach to incorporating institutional-level impact and environment into the scoring profile, to mitigate against the risks of the introduction of an untested element in the assessment. This could be reviewed beyond REF 2021 if it proves too low.

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

The timetable proposed is in line with that of REF 2014; it could be made workable in principle, but remains very tight. The scale of the changes proposed, and the fact these are being introduced mid REF cycle, is likely to create significant challenges in meeting the deadlines suggested. Timely publication of the initial decisions, guidance on submissions and panel criteria will determine whether any subsequent steps in the timetable are realistic. We would like to see HEFCE get the institutional level pilot going as soon as possible, and carefully assess the feasibility of all the changes proposed within this suggested timetable.

**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?**

We encourage HEFCE to work with CRIS providers early in the process and issue timely guidance on REF 2021 to ensure seamless integration with the REF submission systems

We also encourage HEFCE to ensure that appropriate mechanisms are in place to continue monitoring progress in equality and diversity REF 2021, whether or not the proposals around portability are implemented. Despite the significant burden of assessing individual staff circumstances in previous exercises, there are concerns that removing this mechanism altogether may be a backward step in the promotion of equality and diversity in REF, and that the progress made so far may be lost. We therefore support retaining the requirement for institutions to submit a code of practice, and solutions that make the monitoring of equality and diversity more light touch. For example, equality and diversity data could be required as part of the environment template.

There may also be some benefit from inviting institutions to refer to important sector-led initiatives to promote and advance key agendas that are represented by the various concordats currently in place. For example, providing scope for institutions to make reference to their efforts to address the issues raised in the *Concordat to support research integrity*, the *Concordat to Support the Career Development of Researchers* and the *Concordat on Openness in Animal Research* may help to further embed these important initiatives.