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# Consultation on the second Research Excellence Framework

This Word version of the response form is available to help respondents prepare responses before submitting them through the online form. Do not respond to the consultation using this Word form. Only responses received through the online form will be reviewed and included in our analysis.

## 1. Respondent details

Responses to this consultation are invited from any organisation, group or individual with an interest in research or research assessment. We will publish an analysis of the consultation responses. We may publish individual responses to the consultation in the summary. Additionally, all responses may be disclosed on request, under the terms of the relevant Freedom of Information Acts across the UK. Responses to this consultation are unlikely to be treated as confidential except in very particular circumstances. Please note that each question has a limit of 500 words.

**Please indicate who you are responding on behalf of**

- As an individual
- Higher education institution
- Subject association or learned society
- Representative body
- Department or research group
- Business
- Charity
- Public sector organisation
- Other

Please provide the name of your organisation

The University of Leeds

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## 2. Overall approach

### 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?

We support the proposal to maintain an overall continuity of approach with REF2014. By maintaining the structure of the exercise (with outputs, impact and environment assessed by peer review) HEIs will be able to use the experience of the REF2014 submissions to increase efficiency of the process. This is critical to achieving one of the central tenets of the Stern Review, the reduction of burden associated with the REF.

We note that many of the proposals put forward in the consultation document represent major deviations from the approaches used within REF2014. Making such a large number of significant changes at once will undoubtedly result in an increased burden within HEIs to ensure they understand the changes and implement processes and mechanisms to accommodate them. This increased burden is likely to be exacerbated by the fact that any changes will be introduced late in the current REF cycle. At a time of much change within the sector, it would be highly beneficial to maintain a continuity of approach as much as possible. We suggest that changes are prioritised, allowing them to be gradually introduced within the current and subsequent REF cycle.

## 3. Unit of assessment structure

### 2. What comments do you have about the Unit of Assessment structure in REF 2021?

In our view, Criminology should be treated in much the same way as in REF 2014 i.e. that it was explicitly welcomed by UoAs 20 (Law), 22 (Social Work and Social Policy) and 23 (Sociology) and common procedures were put in place to ensure consistency and equity of treatment across these sub-panels, including cross panel calibration and the appointment of joint assessors. We neither support the creation of a separate UoA for Criminology nor the inclusion of 'Criminology' in the title of any specific UoA. In our view any change to the status of criminology would go against the deeply held notion of it as an interdisciplinary field of enquiry embracing diverse disciplinary perspectives. Any change would deny the rich history of criminology's engagement with a broad range of disciplines which was reflected in the spread of UoAs to which criminological work was submitted in REF2014.

In our view, it would be beneficial for HEFCE to focus on building on the REF2014 processes and mechanisms to ensure better coordination and consistency across the three designated sub-panels that welcomed criminology during REF 2014 (UoAs 20, 22 & 23), and for these to be supported and championed by commitments from the social sciences main panel (Panel C in REF 2014). We believe that 'flagging' criminology sub-profiles will provide a valuable way of highlighting the important work that criminology plays in informing and supporting the wider disciplines - of Social Policy, Sociology, Social Work and Law.

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## 4. Expert panels

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

- Yes  
 No

Comments:

We agree that the submissions guidance and panel criteria should, ideally, be developed simultaneously, so that the guidance fully reflects the panels' requirements. However, we are concerned that this might lead to a delay in publication of the technical guidance. Were there to be significant changes from REF2014 requirements this delay would add to the burden on institutions.

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

- Yes  
 No

Comments:

We do not support the later appointment of sub-panel members. This objection is based on the fact that sub-panel chairs alone are unlikely to be able to represent the whole range of disciplines in their UoA, thus running the risk that criteria would fail to command the confidence of the community.

Sub-panels require time to develop common working practices, to have ownership of the panel criteria and for all members – academic and user – to develop common understanding of the application of the assessment criteria, drawing, as appropriate on the experience of REF2014 panel members. If sub-panels are not convened during the criteria-setting stage it is likely that additional time would be needed at the start of the assessment period to develop working practices and familiarise members with the criteria.

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

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Yes

No

Comments:

The University welcomes the proposed measures outlined for improving the representativeness of panels. The appointment of main and sub-panel chairs should continue to be made through an open application process. We welcome proposals that members of selection panels will receive equality and diversity briefings and unconscious bias training. The University suggests that positive action messages are used to support recruitment advertising, welcoming applications to these roles from under-represented groups. The proposed collection of demographic information at application stage is welcome in order to be able to carry out effective subsequent analyses of proportional representation.

**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 the open nomination process employed in REF2014 (with the additional measures to support representativeness proposed in paragraphs 35 and 37).

It would be appropriate to allow HEIs to nominate members, subject to these nominations being endorsed by appropriate learned bodies.

The University suggests that nominations for panel members should be opened up to all organisations and individuals (in addition to this being done by nominating bodies). The process of inviting nominations and the exclusion of self-application poses an increased level of risk of the influence and presence of unconscious bias in selection, decision making and outcome.

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

Yes

No

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Comments:

The University welcomes the suggestion for nominating bodies to supply the E&D characteristics of membership. This should be especially helpful in analysing the profile of nominations made by the relevant body relative to their membership and enable nominating bodies to address any disparities early. Similarly, the introduction of a question on how E&D was taken into account when selecting nominees is also very welcome. It is important that membership of all under-represented groups and protected characteristics is considered in this and there should be a requirement for any significant disparities to be explained.

6. Please comment on any additions or amendments to the list of nominating bodies, provided alongside the consultation document.

We suggest adding the UK Society for Behavioural Medicine.

## 5. Staff

**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?**

We fully understand the rationale behind using HESA data to identify the research active staff eligible for submission. However, there are fundamental issues with using HESA cost centres to map staff to UoAs:

- The HESA coding was not been designed for this purpose, being rather initially designed to capture teaching structures for a university.
- There is not a one-to-one mapping between cost centres and UoAs. HESA codes are generally allocated to cost centres based on teaching responsibilities rather than research areas. This creates a potential for confusion and/or game-playing
- As the coding is not based on research activity, allocation via HESA cost centres could limit the capacity of a unit to present the whole range of its work in a coherent fashion. It may result in work being allocated to a UoA without the appropriate relevant expertise for robust assessment: not only would this potentially miss-reflect a universities research portfolio, but would lead to an increase in burden to UoAs through an increase in cross-referrals
- This would act against interdisciplinarity, as institutions would potentially be forced to submit members of an interdisciplinary research team to different UoAs. Many researchers who work in interdisciplinary teams reside in departments that are not within their actual subject

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area; assignment based on HESA codes would very likely mean that these researchers would be assigned to the wrong UoA.

- It would disincentivise HEIs from developing new research areas. This would be due to the inability to support new areas through interaction with existing strengths, as they could be immediately forced to stand alone as a solo submission in the REF. This would make new research areas extremely difficult to set up due to (a) the lack of time for a new research area to develop a successful impact stream, and (b) any lack of portability of outputs into this new area.
- If automatic assignment is adopted, we envisage a large administrative burden on the HEI and HEFCE in resolving issues of incorrect assignment.

We suggest that the HESA return is used (along with an indicator of independence) to gauge the total number of research active staff that a HEI is expected to submit, but that the allocation of those FTE to UoAs remains with the control of the HEI. This would act as an audit for 'all staff' while maintaining the flexibility needed to fully demonstrate a HEIs research portfolio accurately.

**8. What comments do you have on the proposed definition of 'research-active' staff described in paragraph 43?**

The REF2014 definition of research active, based on HESA categories, is adequate. We note that it is not the intention to include research assistants in the volume measure for staff.

In addition, we believe that it would be helpful for HEFCE to develop, with the sector, some characteristics that would assist in distinguishing between independent and other research staff for REF purposes, recognising that such characteristics would be indicative only and discipline specific. We do note that any such additional classification will naturally cause a discrepancy with the HESA data.

It is worth noting that if the proposal for all research-active staff to be submitted is adopted, the burden of selecting which staff to be submitted will simply shift to deciding how many outputs staff have associated with them.

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

**9a. The proposal to require an average of two outputs per full-time equivalent staff returned?**

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We support the decoupling of outputs from staff, and agree that the average of 2 outputs per FTE is appropriate.

We agree that HEIs should retain the freedom to select outputs for assessment. We do not favour the use of sampling as this would move REF away from an exercise which examines excellent research to a research survey. In addition, sampling could disincentivise the publication of some smaller, but still important pieces of work. Such work may arise from PhD studentships, for example, and form the basis of more significant outputs and are an important step in an individual's career.

We note that any decision on the average number of outputs per FTE is unavoidably linked to the issue of portability: if a larger number than 2 outputs per FTE is required, then not only would this have an increased burden on assessment panels, but would also adversely impact on staff mobility: it is highly unlikely that researchers appointed towards the second half of this REF period would have enough quality outputs to submit, thus disincentivising HEIs from such appointments.

#### **9b. The maximum number of outputs for each staff member?**

We support the need for a maximum number of outputs for each staff member, as this will prevent potential bias with UoA returns by a few individuals. We agree that a maximum of 6 outputs per person is appropriate,

We would welcome confirmation that imposing a maximum will not prevent outputs being used by others in the same UoA if a staff member named on the output is already associated with the maximum number of outputs.

#### **9c. Setting a minimum requirement of one for each staff member?**

We believe that it would be difficult to define a researcher as "research active" if they had zero outputs returned and that the minimum should therefore be set at one. However, consideration should be given to allowing the return of a specified (small) proportion of eligible staff with zero outputs without penalty. This will be essential if non-portability is also applied, so as not to penalise institutions for recruitment late in the assessment period.

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

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**10a. Is acceptance for publication a suitable marker to identify outputs that an institution can submit and how would this apply across different output types?**

In line with our wish to retain some continuity with REF2014, and the complications of making significant changes late in this REF cycle, we would argue to maintain portability of outputs. Institutions recruit globally to address research questions of national importance. The introduction of non-portability could place an unnecessary constraint on such recruitment decisions.

If non-portability was adopted, several practical issues would need to be addressed (please see below).

The date of acceptance for publication may be an acceptable marker for traditional outputs, although we note that it does come at a significant additional burden for the HEI. However, the use of date of acceptance is not a suitable marker for a range of outputs, including (but not limited to): data, compositions/performances, software, conference proceedings.

We thus strongly oppose the blanket use of acceptance date to determine outputs an institution can submit, as it does not fully address the following:

- It does not apply to all output types
- It is difficult to determine
- Is not necessarily readily available in the public domain
- For outputs falling within the scope of the HEFCE open access policy for the REF, the date of deposit of the author accepted manuscript and the date on which it became available via the repository would also need to be checked.

Through monitoring and supporting compliance with the OA policy we have learned that the identification of the date of acceptance is not easy and in many cases necessarily involves input from the author. This would be even more difficult for items not within the policy and could lead to us artificially constraining the range of output types that we were able to submit with confidence to the exercise. Seeking information about dates of acceptance for outputs beyond the current OA policy would impose a further burden, which would impinge upon academic staff as well as administrative colleagues.

**10b. What challenges would your institution face in verifying the eligibility of outputs?**

We envisage a number of problems in verifying eligibility of outputs if non-portability was adopted:

- Non-portability was suggested to avoid any “gaming” of individuals moving towards the end of the REF census date. However, introducing a non-portability rule may just bring in another form of “gaming” whereby publications are delayed so that they can be transported to a new institution.
- Identifying the date of acceptance of the publication (day/month/year) and the location of the researcher. This would be particularly problematic for these researchers in the social sciences, arts and humanities fields where publication may come a long time after the signing of a

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contract. It may mean, if the researcher moves during this time, that it would be very difficult to decide which institution was able to submit that output, and will create an administrative burden on institutions to resolve such disputes.

**10c. Would non-portability have a negative impact on certain groups and how might this be mitigated?**

Non-portability would undoubtedly have a negative impact on early career researchers, who have traditionally used their potential REF contribution in establishing their careers.

Non-portability would also serve to disincentivise the development of new research areas mid REF cycle, or the investment in new staff. If non-portability is introduced retrospectively, midway through the REF process, then those HEIs that have invested heavily in new staff and early career researchers will suffer as they will not be able to submit outputs from those staff.

**10d. What comments do you have on sharing outputs proportionally across institutions?**

While this may seem like a pragmatic solution, this is likely to be extremely difficult and time consuming with numerous different cross-institutional discussions and would add an element of inconsistency. As such, this would work against the aim of the Stern Review in terms of reducing burden.

An alternative may be to allow both institutions to submit a specified maximum number of outputs where staff change institutions after a certain date, in a similar way to the arrangements in RAE2008 for staff changing institutions within a year of the staff census date.

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**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?**

Yes

No

Comments:

While we recognise the benefits of a unique personal identifier such as ORCID we do not support its use as the staff identifier for REF2021. However, it may be possible to introduce ORCID during the next REF cycle. Our objection is based upon: (i) the incomplete use of ORCID by all academic staff, (ii) potential data protection issues as ORCID is a non-UK service.

The HESA staff identifier is already in place and internal systems are set up to incorporate this in REF submissions. The HESA staff identifier is “owned” by the institution and has the advantage of permitting analysis of the submission in relation to protected characteristics. In contrast the ORCID is “owned” by the individual member of staff and does not permit analysis in relation to equality and diversity protected characteristics.

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

We do not support the proposal to remove Category C as a category of eligible staff.

A crucial factor in the success of any University-NHS partnership is the ability to forge interdisciplinary links between staff in both organisations; indeed, this was the premise on which Dame Sally Davies created the NIHR as a wider NHS research faculty.

Research excellence drives the quality of clinical care. We consider it would be a retrograde step to remove the concept of NHS-funded research active staff from any assessment of research excellence. We are strongly in favour of retaining Category C as an eligible category. We actively promote collaboration with NHS bodies to (i) ensure the relevance and impact of our work, (ii) support the delivery of research and teaching and (iii) identify and support candidates for further research training and academic capacity building. Retaining Category C would align with these objectives.

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

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It would be helpful if the definition used in REF2014 was supplemented by some further indicative characteristics to assist institutions in discriminating between (non-independent) research assistants and independent researchers. Given the range of career paths and roles it is unlikely that a wholly unambiguous definition can be provided and some judgement will be required; we would suggest that in such cases HEIs are asked to justify through normal REF auditing arrangements.

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

A minimum of 0.2 FTE seems appropriate. We suggest that a more robust approach to address game playing would be a more rigorous audit of minimal FTE contracts, or through submission of evidence of the individual's role and contribution to the institution. Depending on the degree to which staff and outputs are decoupled, measures may also need to be taken to remove the relevant FTE from the calculation of eligible staff.

## 6. Collaboration

**15. What are your comments in relation to better supporting collaboration between academia and organisations beyond higher education in REF 2021?**

We do not support a formal system to monitor collaboration between academia and organisations beyond HEIs, as any such system could lead to a distortion of research activity in order to meet these criteria. Rather, we would support the ability to (optionally) demonstrate such links through studentships, consultancies, KTP activity etc., which will be captured within the environment statement. The broad definition of impact itself also ensures that collaboration beyond academia is captured and rewarded.

## 7. Outputs

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**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

No

Comments:

We welcome this proposal. It will allow institutions to submit their best work with confidence and reduce significantly the burden of monitoring the small number of outputs falling into this category.

**17. What are your comments in relation to the assessment of interdisciplinary research in REF 2021?**

A major issue in REF2014 was that no consensus on what assigning an output as interdisciplinary meant in terms of how the said output would be assessed. Going forward, HEIs would welcome more comprehensive guidance from HEFCE on what "interdisciplinary research" should be categorised as. In addition, such guidance will need to be extended to the UoA panels, ensuring that both submission and assessment are undertaken on a level playing field.

**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

No

Comments:

We support the limited use of bibliometrics to support (not replace) the assessment of outputs by sub-panels, much as they were in REF2014. It will be important to ensure panels are well-informed about the metrics and their limitations. However, use of metrics to support decisions by panel members, or aid

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in any discrepancies between panel members, may be helpful.

We support an approach where bibliometrics are used to support peer review. It is important that such bibliometrics are provided by an independent body, ensuring both a consistency across UoAs and transparency in the generation, and use, of these data.

## 8. Impact

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

Yes

No

Comments:

Maintaining consistency where possible with REF2014 impact assessment process would assist in embedding a better understanding of impact within the academic profession.

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

We welcome confirmation of the scope of eligible impact. We note that for REF2014 impact included public engagement, cultural and policy impact, but that it was more difficult to submit these due to lack of tangible evidence associated with these types of impact. We would welcome further guidance from HEFCE on these areas, thus ensuring that these important areas of impact are correctly recognised by UoA panels in their assessment.

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**21. Do you agree with the proposal for the funding bodies and Research Councils UK to align their definition of academic and wider impact?**

Yes

No

If yes, what comments do you have on the proposed definitions?

We are supportive of any move to provide a consistent message for the definitions of both academic and wider impact.

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

By their nature, reach and significance will be discipline specific and (to a degree) subjective. The lessons learnt from REF2014 will aid REF2021 panels to better evaluate these important facets of impact, drawing on the REF2014 case studies as training examples.

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

Examples of appropriate evidence types and underpinning research/bodies of research would be welcome. We would support the development of a best-practice guide (or training workshops) to ensure that HEIs/HEFCE/UoA panels agree on a single definition of public engagement impact.

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

Yes

No

Comments:

All impact case studies which fulfil the REF2021 eligibility criteria should be treated in the same way. No additional or different rules should apply to cases related to those submitted in REF2014. To do otherwise could discourage long-term engagement with the users of research.

The submission of impact cases in more than one UOA and/or more than one HEI should continue to be allowed to reflect collaborations and moves within or between institutions with both UOAs/HEIs continuing to research and drive impact.

**25. Do you agree that the approach to supporting and enabling impact should be captured as an explicit section of the environment element of the assessment?**

Yes

No

Comments:

We support the inclusion of impact within the environment statement. Given that research and impact are integrated it may not be helpful to separate impact into a discrete section of the statement.

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

We agree that the number of case studies should be related to the FTE staff volume.

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Guidance for how this will be impacted by any institutional level impact case studies needs to be thought through. Can impact be used at both the UoA and institutional level? If so, then FTE volume is appropriate, but if not then we run the risk that some UoAs will be short of impact case studies if they contribute to institutional-level studies.

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

- Yes  
 No

**Comments:**

We agree that the details of underpinning research outputs, staff roles and employment dates would be best presented in a consistent manner, and that standard forms of funder names are employed.

We do not support, at this stage of the assessment cycle, a requirement to use standardised data throughout the entire impact case study, but rather support the generation of guidance on the types of eligible information. Institutions will already have gathered evidence of impact, and if a too rigid requirement to conform to standardised data presentation is required then this could be unduly burdensome for those bodies from whom we seek corroborative statements and evidence.

Based upon these caveats, we believe that it will be very difficult to produce a set of standard formats that encompass all types of evidence within the timespan of REF2021. A requirement to present evidence in a specified format could constrain the scope of impact which is presented via the exercise. We propose that any implementation is delayed until the next REF cycle, allowing both HEIs and HEFCE to explore the most advantageous use of mandatory fields within the impact case study template.

**28. What comments do you have on the inclusion of further optional fields in the impact case study template?**

Where information is required to support post-exercise analysis it should be optional, it should not impinge on the space allocation for the case itself.

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**29. What comments do you have in relation to the inclusion of examples of impact arising from research activity and bodies of work, as well as from specific research outputs?**

We support this proposal. However, to ensure that such examples could be included in the most beneficial way, we suggest that robust panel guidance should be developed, including examples of acceptable evidence of quality in bodies of research. Given the impact period itself has moved on, we see no reason why the underpinning research couldn't have the same start date as in REF 2014 (1st Jan 1993) and extend to December 2020.

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

Yes

No

Comments:

As the impact period itself has moved on, we see no reason why the underpinning research should not have the same start date as in REF 2014 (1st Jan 1993) and extend to December 2020.

**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?**

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We agree that the threshold for underpinning research should remain at 2\*. However, we note that this standard should be assessed in the round, not by reference to a single criterion (rigour). Broadening the scope of underpinning research (to include research activity or a body of work, as well as specific research outputs, we believe, is fundamental to accepting the multidisciplinary nature of research that will underpin a non-academic impact.

**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:**

**32a. The suggestion to provide audit evidence to the panels?**

We believe that a move away from the impact evidence format used in REF2014 would significantly increase the burden on institutions and on panels; on institutions because diverse formats of evidence would have to be converted into a form suitable for submission. This would have to be done for all evidence for all cases, rather than just for those requested for audit, as was the case in REF2014. In addition, there would be a significant additional burden on panels in terms of reviewing this substantial increase in documentation, and we are not clear if this would actually aid in scoring by panels.

**32b. The development of guidelines for the use and standard of quantitative data as evidence for impact?**

While it could be helpful to have guidelines on the use of standard data for evidence we believe that this should not be mandatory in this exercise. Due to the large variance in impact evidence presented, some of which is more easily quantifiable than others, there is a risk that mandatory quantitation of some evidence would lead to a two-tier system of evidence, potentially leading to incorrect assessments of impact.

Given the desire to further embed certain forms of impact (e.g. public engagement, policy) into REF2021, we would welcome guidance on how best to provide evidence of impact in these areas. This could lead to more consistency in how these case studies are presented, reducing the burden on panels in assessing them.

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**32c. Do you have any other comments on evidencing impacts in REF 2021?**

The introduction of impact in REF2014 was an undoubted success. It is true that many HEIs initially experienced difficulties in evidencing impact case studies, and this led to some sub-optimal submissions and/or increased workload at the panel level due to variable presentation. Both through the central database of REF2014 impact case studies, and the experience gained by individual HEIs during REF2014, the majority of HEIs have been actively developing and collating impact during the past few years. We, therefore, urge that no major (mandatory) changes are made to the system of evidencing impact during the current REF cycle as this could negate this positive action, effectively resetting the clock in terms of HEI development of impact strategies.

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

Any impact that satisfies the eligibility criteria for the 2021 exercise should be submissible and assessed on the same basis. No special or additional criteria should be applied to impact related to any submitted to the previous exercise if further impact can be demonstrated. Indeed, the essence of impact is that it may develop over a number of years, and/or REF cycles; any move to prevent submission of new impact developing from a REF2014 impact case study may act to disincentivise HEIs from such long-term development plans, instead focussing on 'fast-burn' impact that does not necessarily produce a continuing legacy of impact development.

In addition, we would argue against the tagging of impact case studies in any way to identify that they are based on the same research or are demonstrating similar impact to a submitted case study in REF2014. Were this to be the case this should have been flagged in the rules of the 2014 exercise so that we could have chosen our cases accordingly.

## 9. Environment

34a. Do you agree with the proposal to change the structure of the environment template by introducing more quantitative data into this aspect of the assessment?

- Yes  
 No

Comments:

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We agree that quantitative data may aid in the assessment of Environment. However, we note that not all aspects of research culture/environment can be easily quantified, and it is important that the impact of these is not adversely effected by a move toward a more metric-based system. We feel that additional data should only be required if the panels can demonstrate that it is material to their assessment of research or impact. The rationale for the inclusion of any data should be clearly articulated in the panel criteria and working methods.

In relation to post-graduate students we note the suggestion that PGR numbers should be reported. We do not support this. PGR degrees awarded, as reported in REF2014, is a better indicator of a thriving research environment. Given the use of PGR degrees as a metric in previous exercises, where it was seen as beneficial, we do not see a significant argument for moving away from this.

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

If it was possible to use data that is already collected (HESA data for example) this would reduce any further administrative burden on institutions.

It would be beneficial if data was requested in a format similar to that used by other assessment programmes (e.g. Athena Swan), reducing the administrative burden in producing these data.

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

Institutions should be invited to comment on this where it is relevant.

**36. Do you agree with the proposals for providing additional credit to units for open access?**

Yes

No

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Comments:

While we wholeheartedly support open access we do not support the proposal that the REF should be a vehicle for enforcing this.

Institutions may wish to describe this as part of their contribution to the academic discipline, if this section of the environment is retained.

In relation to the proposal to bring monographs within the scope of the OA policy for a REF beyond REF2021 we do not support this unless the policy is fully supported by the major academic publishers.

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

Please see comments above, REF should not be used as an open access compliance mechanism.

## 10. Institutional level assessment

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

Environment- we support the introduction of an institutional-level environment statement to better articulate institutional approaches to promoting research excellence, interdisciplinarity and investment for the future. However, we should be careful to maintain the balance towards the UoA so that the REF ethos of supporting excellence wherever it is found is maintained.

Impact – We do not support the introduction of mandatory institution-level impact case studies. It would not broaden the scope of impact that would be put forward for submission and could undermine UOA level submissions. Impact case studies can still effectively reflect interdisciplinary research submitted at the level of a UoA. We are sure that a large percentage of REF2014 impact case studies demonstrated interdisciplinarity already, so it is difficult to see what else this would achieve. Indeed, it may have the unintended consequence of reducing interdisciplinary research between HEIs and other stakeholders (e.g. industry, policy bodies etc.) due to the need to focus on internal inter-disciplinary work.

In addition, we have severe reservations regarding the proposed percentage split for institutional level impact case studies, which we feel is too high. This is likely to force the artificial creation of ‘institutional impact’, most likely to the detriment of UoA level impact – which was one of the successes of REF2014. We would strongly argue for a maximal 10% of case studies at the institutional level if these are to be

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introduced. Under such a scenario, we would urge that guidelines on institutional case studies be disseminated at the earliest possible opportunity, including on how institutional- and UoA- level impact case studies inter-relate.

Finally, we note that to introduce a change at this point in the REF cycle may cause an alteration in research governance/audit at many HEIs, which would be highly burdensome. If institutional-level impact case studies are felt desirable, we would suggest implementing them within the next REF cycle, allowing a proper reflection on their purpose and generation of suitable guidance.

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

Several factors would need to be taken into account: Purpose, content, assessment (by whom, by what criteria), outcome differentiation, complementarity to UoA level statements, possible depletion of UoA submissions, burden of compilation and assessment, capacity to assess all institution types fairly, and avoidance of double-counting.

## **11. Outcomes and weighting**

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

We support the overall distribution of weightings between outputs, impact and environment. We have some concerns about the relatively high weighting allocated to the proposed institutional-level aspects.

**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

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No

Comments:

We do not support the introduction of an institutional level impact case study, as detailed in our response to Q38. We would advocate that impact should remain at 20% and be based wholly on UoA impact case studies.

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

Yes

No

Comments:

We have some concerns about the relatively high weighting allocated to the proposed institutional-level aspects. As articulated above, we do not support an institutional level impact case study proposal, and would suggest that the 20% weighting for impact is through UoA-level impact case studies, as was the case in REF2014. While we support the concept of an institutional environment statement, we believe that it should not have equal weighting with the UoA-level environment statement. Rather, we propose that the institutional-level environment section should contribute 5% to the overall profile, with a 10% weighting attributed to the UoA-level environment section.

## 12. Proposed timetable for REF 2021

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

The proposed date ranges for data (ie continuous with the REF2014 data) are sensible.

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Details of the submission requirements should be provided as soon as possible, particularly information on the calculation of the staff, outputs and impact case study volumes, and a decision on the portability of outputs.

To avoid additional burden on institutions to respond to the many proposed changes that have been suggested, it may be better to postpone some aspects of the proposals to the start of the next REF cycle, allowing institutions time to adapt to the new arrangements. This is particularly the case where pilot studies are required to identify best practice for a proposal; it will pose a significant burden to HEIs to participate in a pilot exercise, input into REF2021 guidance and adapt to new working practices in the short period between the present time and the REF2021 submission.

## 13. Other

**44. Are there proposals not referred to above, or captured in your response so far, that you feel should be considered? If so, what are they and what is the rationale for their inclusion?**

The HEFCE open access policy for the REF has been subject to two temporary amendments. It would be helpful if the policy were finalised as soon as possible and not amended again until after the submission deadline for REF2021. In addition we would urge HEFCE to clarify the scope of the policy and in particular to confirm that items such as obituaries, letters, editorials and book reviews (which would not normally fulfil the REF definition of a research output), which are published in journals are nevertheless outwith the scope of the policy.

In the interests of minimising the burden on institutions we would urge that due consideration is given to the likelihood of deadlines for submissions to the TEF and REF occurring at the same time, or close to one another.

## 14. Contact details

**If you would be happy to be contacted in the event of any follow-up questions, please provide a contact email address.**

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