

## Annex A

### Consultation questions and response form

1. Responses to the consultation should be made by completing the form below, and returning it by e-mail by **midday on Wednesday 16 December 2009**.
2. All responses should be e-mailed to [ref@hefce.ac.uk](mailto:ref@hefce.ac.uk). **In addition:**
  - a. Responses from institutions in Scotland should be **copied to** Pauline Jones, Scottish Funding Council, e-mail [pjones@sfc.ac.uk](mailto:pjones@sfc.ac.uk).
  - b. Responses from institutions in Wales should be **copied to** Linda Tiller, Higher Education Funding Council for Wales, e-mail [linda.tiller@hefcw.ac.uk](mailto:linda.tiller@hefcw.ac.uk).
  - c. Responses from institutions in Northern Ireland should be **copied to** the Department for Employment and Learning, e-mail [research.branch@delni.gov.uk](mailto:research.branch@delni.gov.uk).
3. We will publish an analysis of responses to the consultation. Additionally, all responses may be disclosed on request, under the terms of the Freedom of Information Act. The Act gives a public right of access to any information held by a public authority, in this case HEFCE. This includes information provided in response to a consultation. We have a responsibility to decide whether any responses, including information about your identity, should be made public or treated as confidential. We can refuse to disclose information only in exceptional circumstances. This means responses to this consultation are unlikely to be treated as confidential except in very particular circumstances. Further information about the Act is available at [www.informationcommissioner.gov.uk](http://www.informationcommissioner.gov.uk). Equivalent legislation exists in Scotland.

#### Respondent's details

<b>Are you responding:</b> (Delete one)	On behalf of an organisation
<b>Name of responding organisation/individual</b>	Housing Studies Association
<b>Type of organisation</b> (Delete those that are not applicable)	Academic association or learned society
<b>Contact name</b>	Ed Ferrari
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#### Consultation questions

(Boxes for responses can be expanded to the desired length.)

**Consultation question 1:** Do you agree with the proposed key features of the REF? If not, explain why.

The Housing Studies Association (HSA) is the UK's leading organisation for scholars researching and working in the field of housing and related areas. The majority of our members are active researchers and work in or for organisations that will be assessed under the REF. The Association represents its members' interests, and it also works to promote applied and theoretical housing research. The Association also has close ties with professional and voluntary bodies, including the Chartered Institute of Housing (CIH), the department for Communities and Local Government (CLG), the National Housing Federation (NHF) and the Joseph Rowntree Foundation (JRF).

For these reasons, the HSA welcomes the opportunity to respond to this consultation. It acknowledges the importance of the REF process both to its members and to the vitality of the housing research community. Our response reflects the views of our membership (which has been fully consulted) and the members and co-optees on our Executive Committee, which includes representatives from the CIH, CLG, JRF and NHF.

In the RAE (the REF's predecessor), the largest groupings of housing researchers were submitted to Unit of Assessment (UOA) 31 (Town and Country Planning), although other members submitted to other UOAs including Geography and Environmental Studies, Social Work & Social Policy and Administration, and Sociology. Most of our response applies equally, regardless of the panels and sub-units to which our members submit. However some parts of our response are based on the assumption that large groupings of housing researchers will continue to submit to a Town and Country Planning UOA or its successor.

In general, we agree with the proposed key features of the REF. We agree that there is some merit in attempting to simplify what is inevitably a complex and costly process. But we would strongly caution against simplification where it risks re-introducing problems that successive improvements to RAE sought to ameliorate. Many of the features of the RAE process were designed following consultation with the academic community to ensure that the process of assessment was as fair and transparent as possible. Great care must be exercised to ensure that biases and distortions are not re-introduced into the assessment framework. Detailed rules, for example on the eligibility of staff that have recently moved, may add complexity but are also instrumental in ensuring a fair and representative assessment.

We agree that the REF should focus over all else on research quality and that the assessment of the excellence of research outputs should contribute most to the overall assessment of excellence.

Housing scholars' work is routinely used by the wider community, including policy makers, local government and voluntary sector organisations, housing associations, community groups and others. Therefore, in general terms, the HSA would also support a focus on research impact, although we would perhaps urge a more conservative approach than that proposed. We feel strongly that housing researchers, perhaps more so than in other disciplines, value making an impact and in many cases this provides a motivation for them undertaking research. Therefore, assessing impact is, in our view, the right thing to do. However, given the wide range of research users and the variety of ways in which research can have an impact – including at times in the future and in ways not easily foreseeable – it is not easy to see how it can be objectively

'measured', and there are acknowledged problems associated with attribution, time lags and corroboration. With this in mind, allowing the Impact sub-profile to account for a quarter of the full assessment seems to us to be excessive at this stage – the first time that impact has been explicitly assessed. Given some of the uncertainties, we would prefer to see that impact is not weighted as highly as is proposed in the consultation document: perhaps 15%, with the proven output measure given a higher weighting than that proposed. Furthermore, we note that wider engagement and other elements that go to make up a quality research environment and which contribute to the effectiveness of impact are counted as part of the Environment sub-profile. This should be equal in importance to Impact, and any potential for double counting across these sub-profiles should be minimised. We say more about these issues in our responses to Questions 3 and 5.

**Consultation question 2:** What comments do you have on the proposed approach to assessing outputs? If you disagree with any of these proposals please explain why.

Comments are especially welcomed on the following proposals:

- that institutions should select research staff and outputs to be assessed
- for the categories of staff eligible for selection, and how they are defined
- for encouraging institutions to submit – and for assessing – all types of high-quality research outputs including applied and translational research
- for the use of citation information to inform the review of outputs in appropriate UOAs (including the range of appropriate UOAs, the type of citation information that should be provided to panels as outlined in Annex C, and the flexibility panels should have in using the information)

and on the following options:

- whether there should be a maximum of three or four outputs submitted per researcher
- whether certain types of output should be 'double weighted' and if so, how these could be defined.

The HSA supports the generic definition of research significance proposed in the consultation (at para 39). Many Housing scholars are engaged in producing excellent research which is applied in its focus, and there is a strong tradition in the discipline of applied work which is strongly grounded in theory and conceptually and methodologically robust.

We agree with the proposal to exclude 'Category C' staff from eligibility. This should ensure fairness by ensuring that institutions do not claim credit for having associated or honorary researchers that do not, in practice, actively contribute to research outputs. We feel that where such staff do genuinely contribute, for example by fostering a high quality research environment or by helping to improve impact, this will be reflected, appropriately, in the Environment and Impact sub-profiles. We also believe that where returned staff members are on fractional contracts their research outputs should be attributed only to their main institution where it is clear that there is not an equal split.

Para 27i of the consultation document refers to the importance of international benchmarks. We agree that excellent research is most often research that is international in its significance and

meets internationally excellent standards of rigour and originality. However, we are concerned to ensure that, given the tendency of UK researchers in housing and other disciplines (such as town planning and social policy) to be working within the frame of 'domestic' policy and legal regimes the use of international benchmarks reflects this. It is our view that much research, although sometimes set within local contexts, nevertheless produces research outputs that are agenda-setting in international terms (in part due to the advanced nature of housing legislation and strategy in this country). At the very least, we think the use of quantitative measures or citations indices to produce international benchmarks is particularly flawed, even as a secondary measure, and a more subjective, expert-led set of international benchmarks should be sought. This could involve, for example, the use of international associate members of panels who are asked to comment on international issues but who are not full members of the panel (but see also our response to Question 6).

With more general reference to the use of quantitative measures (and bibliometrics in particular) we would welcome the proposed approach to devolve the decision on the use of citation information to the panel level. We would furthermore expect to see this decision further devolved to UOA level. In the case of Housing research, we would view the potential of bibliometric data as a tool for comparison with a healthy level of scepticism because of the only partial coverage of important research outlets in key databases and the 'game playing' practices that can be used to artificially inflate scores.

Housing researchers, unlike in some other disciplines, tend to focus on ensuring excellent quality research outputs even where this is to the detriment of the quantity of outputs they generate. Consequently, we do not think that there is anything to be lost by reducing the number of required outputs per researcher to three. Indeed, there may be benefits in that it will allow the outputs to reflect the highest quality research and the assessment to be significantly more cost effective. Ideally, we would prefer cost savings to be achieved by reducing the number of required outputs than by reducing the number of UOAs – see our response to Question 6.

**Consultation question 3:** What comments do you have on the proposed approach to assessing impact? If you disagree with any of these proposals please explain why.

Comments are especially welcomed on the following:

- how we propose to address the key challenges of time lags and attribution
- the type of evidence to be submitted, in the form of case studies and an impact statement supported by indicators (including comments on the initial template for case studies and menu of indicators at Annex D)
- the criteria for assessing impact and the definition of levels for the impact sub-profile
- the role of research users in assessing impact.

As we note in our response to Question 1 we are broadly supportive of proposals to assess impact. We do consider, however, that there are some practical difficulties associated with it, and moreover that it would be prudent to adopt a more conservative approach to weighting the Impact sub-profile than that proposed (see our response to Question 5).

A key concern is that, while important, the approach that will be adopted by submitted HEIs will essentially be one of 'story telling' – this will be very difficult to measure objectively. There are acknowledged problems with the corroboration of claimed impact, the appropriateness of timing, and causality or attribution of research impact to observed outcomes. Furthermore, many aspects of impact might overlap with elements assessed as part of the Environment sub-profile, and there is potential for double-counting. While we accept that there are ways that the panels can develop guidance on these issues, we feel that it would be prudent not to attach too much weight until the experience and evaluation of the Impact assessment part of the first REF is known in more detail. Given the mutually reinforcing nature of the relationship between research environment and impact, we do not think that there is a strong argument for suggesting that the Impact sub-profile should be weighted more highly than the Environment sub-profile (as suggested in principle at para 27b, and in detail at para 84 of the consultation).

In the context of proposals for a smaller number of larger UOAs, which may be less likely to have expert representation, judging impact may require specialist knowledge or expertise. Notwithstanding this, it may remain difficult to satisfactorily judge impact across a diffuse subject area. For example, 'impact' for architects (a label which masks considerable heterogeneity in research methods) will require familiarisation with quite different traditions, processes and policy networks than might be the case for housing researchers, even though architects, in the main, design houses!

We are somewhat concerned that measuring impact will effectively lead to the double counting of research income. This is unhelpful because there is no automatic link that we can see between the quanta of income and the quality (in terms of originality, significance and rigour) of the body of research that it 'buys'. This was well established for housing and town planning by the evidence from the last RAE. Given that the principles of the REF are that it is to be selectively and explicitly about 'excellence', the assessment of impact needs to be clearly restricted to the 'added value' that impact reflects and the mutually reinforcing benefits of high impact research on quality, rather than measures of quanta. Income is an important measure of activity and for this reason we consider it right that it is reflected in an assessment of the research environment (although again with care and alongside other indicators). Care should be taken that it is not again counted – explicitly or implicitly – as part of an assessment of impact.

The last RAE produced profiles that were generally accepted to be robust. There is a danger that the high proposed weight attached to the impact sub-profile together with the highly imperfect basis for its measurement will inflate the scores associated with moderate quality but highly visible research. This may break the link between the REF outputs and a rigorous assessment of the quality of research activity.

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

Within the context of enlarged and more heterogeneous UOAs, we are concerned that measures of the research environment, particularly of research income, may suffer from biases and distortions. We feel that it is important that individual HEIs should be able to choose to make multiple submissions to UOAs where there are clear reasons for doing so. This would make sense, for example, where the qualitative nature of the research environment substantially varies between disciplines. The research environment which many housing scholars inhabit differs in all

sorts of material ways from that of, for example, researchers working on construction techniques. The differing nature of these research environments logically suggests that they should be considered on their own merits rather as potentially as part of one large 'environment' where in practice this does not exist in any meaningful form.

**Consultation question 5:** Do you agree with our proposals for combining and weighting the output, impact and environment sub-profiles? If not please propose an alternative and explain why this is preferable.

We would express some concern about the proposal to accord a 25% weighting to the Impact sub-profile. Although we agree with the principle of assessing Impact and reflecting the many contributions that housing scholars make to society and the economy, for the reasons we set out in our response to Question 3 we would prefer a more 'conservative' weighting. As we also pick up in our responses to other questions, there are some dangers in double counting parts of the assessment, particularly in terms of research income (which underpins the quality of both Impact and Research Environment).

Given that the primary focus of the REF is about excellence in research, we agree that the largest weighting should be accorded to the Outputs sub-profile. A fairer weighting, which also reflects the comparative importance of the research environment, might be Outputs 70%, Impact 15%, Environment 15%.

**Consultation question 6:** What comments do you have on the panel configuration proposed at Annex E? Where suggesting alternative options for specific UOAs, please provide the reasons for this.

The HSA strongly opposes reducing the number of UOAs as a matter of principle. Small but distinct disciplines which nevertheless make significant contributions to social, economic and public life (like housing studies) are disadvantaged by being considered alongside other, larger disciplines with quite separate ways of working and measuring excellence and impact.

Although we recognise that there are advantages in streamlining the REF process, we feel that reducing the number of required outputs per researcher from four to three will contribute to significant cost savings. Consequently we would argue that there would be a diminished need to secure further cost savings by cutting the number of UOAs. Indeed, cutting the number of UOAs will have a significant impact on the ability for quality research to be assessed, which will undermine the validity of the entire process. It would have been far better, in our view, to secure efficiencies in other areas than by cutting of the number of UOAs.

Having said this, we do accept that the number of UOAs is not being explicitly consulted on. With this in mind, we do see that that the problems associated with a reduction in the number of UOAs could be to some extent offset by a commensurate expansion in the number of expert panel members involved, and/or the formal deployment of a system of sub-units. This would need to be mindful of the potential biases that are more likely to result in larger UOAs, such as the different research income and research strategies employed within UOAs.

One way of ensuring that larger UOAs better reflect the heterogeneity of research subject areas within them would be to break the proposed link between the number of submitting FTEs and the

size of the UOA's panel. In very diverse UOAs (such as the proposed *Architecture, Built Environment, Town and Country Planning* UOA, to which many Housing scholars would submit) it is of paramount importance that there is appropriate expertise to reflect significant specialisms and subgroupings. These need not only to reflect differences in disciplinary tradition, but also differences in types of output, modes of research, and familiarity with types of impact and the organisations that might corroborate those impacts. There are very large differences between, for example, construction engineers and social science oriented housing researchers on each of these points.

One possibility referred to explicitly in the consultation (at para 101a) is the expanded use of 'associate members'. We would strongly caution against this as a principle. The wider or more discriminate use of advisors may have some benefits in reducing burden but will be at the cost of ensuring consistency in approach across the UOA, especially in matters related to judging excellence. As recognised in the consultation (para 99b), the panels are instrumental in ensuring consistency in the assessment of excellence. The use of specialist advisors, even under standardised guidance, should not be a routine surrogate for formal panel membership and ensuring that the panels cover the appropriate expertises. Given the importance of housing research in terms of impact and the critical contributions that housing researchers make to academic debates as well as informing urban and social policy, we would expect to see the formally constituted appointment of a Housing expert as part, at least, of both the *Architecture, Built Environment, Town and Country Planning* and *Social Work and Social Policy & Administration* UOAs within proposed main panel C (or within any more disaggregate UOAs that may be implemented).

We remain concerned that whatever panel configuration is adopted there is appropriate level of housing expertise able to recognise and judge the excellence of housing research. It is important to the HSA, which has an interest in the equitable treatment of housing researchers, that the majority of its members' outputs are assessed by a housing scholar that has been involved in all panel discussions and has a shared understanding of quality and all the assessment criteria. This demands full panel membership and not the use of an associate member.

In summary:

- Ideally, we would favour the retention of the UOAs used in the 2008 RAE
- Recognising that this may not be possible, we would like to see UOAs having a sufficient range of expertise to include specific expertise on Housing issues
- We would not accept the expanded use of associate advisors to panels as being an acceptable surrogate for wide expert representation on panels, because of the problems of ensuring a consistent understanding of quality and other assessment criteria
- While we recognise the need to improve the efficiency of the REF process, we feel that reducing the number of outputs to be reviewed (from 4 to 3) would be a better way of reducing costs than creating larger and more heterogeneous UOAs.
- We would rather that HEFCE and its partners in the REF prioritised the rigorous assessment of quality over cost-saving, even if this meant that panels consisted of large numbers of subject specialists.

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

As an Association we do not have a view on this save to say that we would be concerned that any attempt to ensure consistency across panels does not jeopardise the robustness of the assessment of quality *within* the panels. For example, we would strongly resist any proposals (either at the REF level or within panels/UOAs) to use sampling as a method of reviewing outputs because, statistically speaking, this will favour larger disciplines and have an unpredictable impact on smaller disciplines. As we have noted elsewhere, we would also resist 'blanket' approaches to the use of bibliometric data, and any disproportionate reliance on 'associate members' of panels.

**Consultation question 8:** Do you have any suggested additions or amendments to the list of nominating bodies? (If suggesting additional bodies, please provide their names and addresses and indicate how they are qualified to make nominations.)

We note that some of the government bodies represented in Appendix F of the consultation are out of date or no longer exist in the same form. For example, the Social Exclusion Unit has been replaced by the Social Exclusion Task Force. The Housing Corporation and English Partnerships have been reorganised to form parts of two new bodies, both of which we feel should be added to the list of nominating bodies. These are:

- Homes and Communities Agency: 110 Buckingham Palace Road, London SW1W 9SA; [mail@homesandcommunities.co.uk](mailto:mail@homesandcommunities.co.uk)

- Tenant Services Authority: Maple House, 149 Tottenham Court Road, London W1T 7BN; [enquiries@tsa.gsx.gov.uk](mailto:enquiries@tsa.gsx.gov.uk)

The Housing Corporation and English Partnerships should be removed from the list.

We would consider that charities like Shelter should be added to the list of nominating bodies. The charity is a major user of research and has an influential role in policy making and governance in UK housing issues.

- Shelter England: 88 Old Street, London EC1V 9HU; [england.shelter.org.uk](http://england.shelter.org.uk)

- Shelter Scotland: 6 South Charlotte Street Edinburgh EH2 4AW; [scotland.shelter.org.uk](http://scotland.shelter.org.uk)

- Shelter Wales: 25 Walter Road, Swansea SA1 5NN; [www.sheltercymru.org.uk](http://www.sheltercymru.org.uk)

- Housing Advice NI: 10-12 High Street, Belfast BT1 2BA; [www.housingadviceni.org](http://www.housingadviceni.org)

The National Housing and Planning Advice Unit (NHPAU) has had an increasingly important role to play in providing advice to planners about meeting housing needs and demand and regularly commissions and uses research from HEIs. NHPAU, CB04 Ground Floor, ONS, Segensworth Road, Titchfield, Fareham PO15 5RR; [www.communities.gov.uk/nhpau](http://www.communities.gov.uk/nhpau)

The Association of Regional Observatories (ARO) represents the nine Regional Observatories in England, which provide an important intelligence and monitoring role for public policy and economic development in the regions. ARO routinely uses academic research on housing related issues. Unit 8, Provident Works, Newdigate Street, Nottingham NG7 4FD; [www.regionalobservatories.org.uk](http://www.regionalobservatories.org.uk)

The Core Cities group represents the chief officers and political leaders of England's major cities outside London. In so doing it uses research to help it formulate cross-city and cross-political

party policy on a wide range of social and economic issues, including housing, planning and regeneration. 4th Floor, One Piccadilly Gardens, Manchester M1 1RG; [www.corecities.com](http://www.corecities.com)

**Consultation question 9:** Do you agree that our proposed approach will ensure that interdisciplinary research is assessed on an equal footing with other types of research? Are there further measures we should consider to ensure that this is the case and that our approach is well understood?

We consider that the most important aspect of the REF that will ensure that interdisciplinary research is assessed on an equal footing with other types is the availability of appropriate subject expertise within panels. Even research outputs that are interdisciplinary in their origins will tend to focus on a specific subject area and will therefore be assessable if there is appropriate subject expertise on the panels (e.g. housing expertise). The generic qualities of excellent research (its originality, rigour and significance) should be equally evident in outputs that are interdisciplinary in their origins and in 'single discipline' research.

**Consultation question 10:** Do you agree that our proposals for encouraging and supporting researcher mobility will have a positive effect; and are there other measures that should be taken within the REF to this end?

Researcher mobility is important for the research community and the quality of the research outputs it generates and their impact. Given the close ties between the housing research community and its economic and social users, we especially value proposals to encourage and support interactions with non-academic sectors. In terms of mobility, we would be particularly keen to ensure that a working definition of 'researcher mobility' is framed in such a way that it promotes the personal and professional development of researchers and their careers (vertical mobility), especially for younger staff. Excessive inter-institutional (horizontal) mobility, on the other hand, can be to the detriment of quality research where it favours the pursuit of individual endeavours over collaborative, collegiate and interdisciplinary research that is both excellent and makes an impact.

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

We welcome any measure to monitor and actively promote equality and diversity in the assessment of research excellence. There is a strong case for the transparent publication of aggregate statistics on issues of equality and diversity and their relationship to research excellence in order to further move towards an open, fair and meritocratic research community with unimpeachable ethical standards.

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

We do not have any comments about the proposed timetable, except that it may be possible to permit some degree of flexibility in the interpretation of the timescales over which near-future impacts might be expected to materialise. Given the case study approach proposed for impact statements, we do not see that the timescale of 2008-12 needs to be as rigidly imposed as for

research outputs or environment. The HSA would be happy to support an extension of the REF period beyond 2012 if this allowed the approach to assessing impact to be more fully developed.

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

As described in more detail in our response to Questions 6 and 7, we consider a reduction of panel workloads through the reduction of required outputs (but not through sampling) to be the best way of reducing burden. We believe that there are dangers that reducing the number of UOAs could compromise the robustness of the process and so we would strongly encourage the retention of some form of housing expertise and disaggregate assessment within the proposed framework, if not indeed the same UOAs as those that successfully operated in the last RAE.

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

No.