Consultation on the second Research Excellence Framework

Page 1: Respondent details

Q1. Please indicate who you are responding on behalf of

Higher Education Institution

Please provide the name of your organisation
University of York

Page 2: Overall approach

Q2. 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?

Peer review by experts is still the cornerstone for research assessment and needs to be maintained. Any changes to the REF process will generate additional burden, as the institution will need to invest resources in understanding the new rules and developing processes to put these new rules into operation.

Page 3: Unit of assessment structure

Q3. 2. What comments do you have about the unit of assessment structure in REF 2021?

As noted in the consultation document, the Archaeology and Geography UoA was highlighted as a panel which appeared to operate as if in two separate halves. Rather than amending the UoAs, it would be more helpful to have standard procedures as to when multiple submissions to single UoAs are permitted and for the working methods to clarify how panels will assess submissions in broad UoAs, such as Archaeology and Geography. Will these be assessed by the whole panel, or by sub-disciplinary groups within the panel?

It is also noted that some UoAs have similar areas described in their descriptors, and hence it is not always clear to which panel research should be submitted. Environmental Science is one such example.

It is not clear what ‘to continue to minimise the fluidity between the UOA boundaries’ means (as cited in the consultation document). Given that one of the issues raised is a concern that interdisciplinary research is less likely be submitted, this statement seems to suggest that there will be tightening of the boundaries and a potentially greater emphasis on ‘core’ discipline areas. This would be unhelpful.

Page 4: Expert panels
Q4. 3a. Do you agree that the submissions guidance and panel criteria should be developed simultaneously?

No

Comments:
It would be difficult to develop these processes simultaneously as the panel criteria rely on the submission guidance. If this resulted in a delay to the publication of the submissions guidance, this would not be acceptable.

Q5. 3b. Do you support the later appointment of sub-panel members, near to the start of the assessment year?

No

Comments:
No -- such delay would raise the concern that sub panels will not have sufficient opportunity to develop as a team or have sufficient time for calibration activities and agreement of the approach to assessment. There is also concern that sub panel chairs would have too much influence over the criteria without reference to the wider disciplinary issues. There may be a perception that the sub-panel members will not be as fully trained or may be less engaged with criteria that have been imposed upon them, rather than developed with them. It would also be helpful if Institutions were given sufficient warning that a member of their staff had been appointed to a panel so that workloads can be adjusted and staff supported appropriately.

Q6. 4. Do you agree with the proposed measures outlined at paragraph 35 for improving representativeness on the panels?

No

Comments:
Requiring selection panels to undertake training is simply good practice, but the selection panel itself needs to be representative and no information is given on how these panels will be formed. Collating demographic data on applicants is standard good practice, but the key issue is to ensure that a range of applicants apply or are nominated.

Q7. 5a. Based on the options described at paragraphs 36 to 38 what approach do you think should be taken to nominating panel members?

It would be helpful to take advice from the Equality Challenge Unit on the best way to encourage diversity in panel nominations. Asking the employing institutions to support the nomination of individuals would be beneficial and allowing academic institutions to nominate staff might provide a broader range of nominations and potentially a more diverse body.

Q8. 5b. Do you agree with the proposal to require nominating bodies to provide equality and diversity information?

Yes

Comments:
In principle we agree, but would ask how this information would be used to improve the diversity of panels. Would there be any consequences if there were concerns in relation to equality and diversity profiles?
Q9. 6. Please comment on any additions or amendments to the list of nominating bodies, provided alongside the consultation document.

The current list of nominating bodies should be more fully reviewed. It is an odd mix of professional associations, funders and various business interests. Given that the aim of the nomination body should be to avoid conflicts of interest, it is unclear why British American Tobacco is included in the list – we cannot support the inclusion of this organisation nor openly political bodies such as Scientists for Labour. As institutions funded by QR are not allowed to nominate staff, the rationale for allowing the Zoological Society of London to nominate is unclear, when its research arm, the Institute of Zoology, undertakes a REF submission and is QR-funded.

Page 5: Staff

Q10. 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?

Staff are placed in HESA Cost Centres based primarily on their host academic department, the identity of which is often driven by teaching considerations. These centres are unlikely to align as well with research interests, especially in relation to interdisciplinary research. If the defined Cost Centres are used, additional administrative processes will need to be put in place to support output referral to alternative UoAs. It is also possible for staff (including those with joint appointments across two departments) to be submitted in more than one cost centre, but the current REF criteria only allow submission in one UoA. As such, the use of Cost Centres is problematic. However, using HESA data to provide an audit figure for the overall FTE of staff expected (as is the case for research income and PhD data) is acceptable at an institutional level.

From a different perspective, if there is a complete break between outputs and staff, so that the number of outputs is based solely on an average FTE over the period (which is an option given in the consultation), basing these data on HESA codes might be feasible. If this process were used, we would need to develop a mechanism for moving outputs from one UoA to another, rather than relying on the REF panels to do this. However, if the intention is to produce an average FTE over the period, this would add a significant administrative burden if the independence of all research staff over the REF period had to be assessed.

If there is a concern that institutions are moving staff around UoAs and changing contract types in order to maximise performance, it would be helpful for HESA also to publish data for those UoAs that an institution did not submit to (but had eligible staff for) and the number of staff on teaching-only contracts - and to publish these data at the same time that it publishes the REF related staff numbers.

Alternatively, the collection of UoA data in HESA could be reintroduced.

Our preferred option is for the FTE to be based on a census date figure, rather than the average over the period. Costs centres should not be used to assign where staff are returned.
Q11. 8. What comments do you have on the proposed definition of ‘research-active’ staff described in paragraph 43?

The use of the HESA Staff Collection activity code of ‘Academic professional’ and an academic employment function of either ‘Research only’ or ‘Teaching and Research’ would pull in all research staff. The flag used in HESA to indicate research assistant is based on the REF2014 definition of staff on research contracts who did not meet the definition of “research independent”. The definition used by REF2014 was also unhelpful, as it required an assessment of whether a member of staff was PI on a grant (or equivalent). This is not a straightforward assessment, especially if a grant has been held at a previous institution. In addition, and given the current success rates on grants and the move towards larger collaborative applications, recognition by PI status is potentially discriminatory against junior colleagues.

The proposed definition should be one that requires as little additional assessment by the institution as possible (i.e. it should not require a judgement call to be made on an individual’s research independence). There is some work being undertaken nationally, involving HESA, that is attempting to define research grade descriptors and these may be useful. Alternatively, it might be more helpful for other criteria to be used, which could vary according to the Main Panel. For the Arts and Humanities, sole authored substantive outputs are seen as evidence of independence, while being a PI on a grant can be a more helpful marker in the Sciences.

Q12. 9a. The proposal to require an average of two outputs per full-time equivalent staff returned?

If setting the average at 2 outputs per FTE is intended to remove the need to submit individual staff circumstances and to ensure the number of outputs submitted nationally does not significantly increase with the requirement to submit all staff, the proposal should be supported. Reducing the number of outputs is also preferable to sampling research outputs by UoA panels. We do not support the concept of sampling outputs which would be the alternative should 4 outputs be retained.

We would also expect that the equivalent of 2 outputs per FTE would also be the maximum that an institution could submit.

Q13. 9b. The maximum number of outputs for each staff member?

Whilst setting a maximum might be sensible in theory, it would only be acceptable if this figure did not impose a blanket limit on jointly authored papers within a submission. For example, (if the maximum were set at 6) if 2 authors had produced 12 papers between them, the institution must be allowed to submit all 12, via 6 assigned to one author and 6 to the other co-author (which is the current case for REF).

If non-portability is accepted, how will outputs from staff who have left be counted? A maximum percentage (6%) might need to be set.

In addition, the question of which staff this would apply to needs to be better articulated given the proposal to break the link between staff and outputs. If the number of outputs is based on the FTE of staff over the period, to which staff would this maximum be set?

If a maximum number of outputs is set, we would propose that this should be set at 4 outputs and not 6, to avoid submissions being skewed towards the outputs of a small number of highly performing staff.
Q14. 9c. Setting a minimum requirement of one for each staff member?

If the number of outputs is based on the average staff FTE (para 47), then which staff would this criterion be applied to? Setting a minimum requirement would be appropriate if the purpose of REF is to measure the research quality over the whole of the UoA but it is not appropriate if the purpose is to identify the highest quality research.

In addition, the question of which staff this would apply to needs to be better articulated given the proposal to break the link between staff and outputs. If the number of outputs is based on the FTE of staff over the period, to which staff would this minimum be set?

Whilst there is not universal agreement within the institution, the majority view is a preference for the setting of a minimum figure of 1 output per FTE. However, we note that this question is also closely linked to the questions of non-selectivity of staff and non-portability of outputs. With a minimum of 1 output, there would need to be exceptions put in place for staff who change institutions close to the submission date, if non portability proposals are also adopted. It would also be expected that co-authored papers could count for both authors in terms of meeting the minimum output threshold.

It should also be noted that for REF2014, staff with personal circumstances were required to have at least 1 output to be submitted. However, even with a minimum of 1, there are still some concerns that staff with special circumstance, especially chronic health conditions, will not be protected sufficiently and we would therefore support putting in place some personal circumstances provisions.

Q15. 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?

As already identified by HEFCE, the definition for acceptance for publication is ambiguous, even for outputs that have a clear publication path, such as via journals. It is unlikely that this would be a suitable marker for other types of output, such as performances or monographs, as the publication route is less formal. As such, date of publication would be a more appropriate marker.

Q16. 10b. What challenges would your institution face in verifying the eligibility of outputs?

The challenge faced will be dependent on the audit requirements put in place by the REF guidance on submission. The challenge is therefore on the level of evidence that will be needed. This could be based on the affiliation on the output, but not all work is published in journals and journals have different metadata standards. For staff on secondments or honorary/visiting appointments, there may well be joint affiliations. The institution will need to rely on dates of appointment and matching to publication dates, although this will be imprecise.
Q17. Would non-portability have a negative impact on certain groups and how might this be mitigated?

There is no full consensus in this institution as to whether non portability should be introduced and both advantages and disadvantages have been identified, as outlined below.

Institutions could be less willing to appoint staff close to census periods, especially if there is a minimum output requirement. This might have a negative impact on staff who are required to move, such as staff on fixed term contracts or those wishing to join the profession (new PhD graduates or post docs). (There should not be dispensation for staff moving in from overseas as this would create further game playing). However on the other hand, these staff would not then be competing with more senior staff who have traditionally been favoured in terms of recruitment close to submission date. Institutional behaviour in appointments would change, as there is likely to be a greater focus on an individual’s future potential, rather than their previous achievements. This is likely to favour both senior staff with a strong track record and more junior staff with potential.

There is also an argument as to whether the non-portability applies from the start of the REF census period or from the point that the REF criteria are agreed. Staff and institutions have already put plans in place for supporting staff throughout the REF period and these plans and new appointments will have been made using assumptions based on portability of outputs. If non-portability is adopted, some exceptions may need to be made, to take account of this switch in policy.

However, there is a concern amongst some staff that non-portability of outputs would reduce the amount of movement within the sector and limit the development of new areas. If a minimum of one output per FTE were required (noting our support for this above), some dispensation would be needed for staff who have moved institutions close to the census date, as there may not have been sufficient time for research outputs to have been published.

Q18. What comments do you have on sharing outputs proportionally across institutions?

Outputs could be shared between institutions, but the time lag for publications does vary between disciplines. How would the losing institution know that an output had been published in order to claim it?

It will be a huge challenge (and administratively burdensome) to quantify which institution should receive what credit for publications arising within perhaps up to two years following a move. This seems to add another layer of complexity to the counting of outputs which would need to be administered, for little gain.

Q19. 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?

No

Comments: The University of York supports the adoption of ORCID and encourages all staff to register. However, this institution would only support this as a mandatory requirement if there was reassurance that the ORCID was not used for audit purposes, especially in relation to confirmation of institutional affiliation. It should also be noted that not all staff publish in ways which require ORCID and mandating its use could therefore be unhelpful. One option is that those submitting journal articles for REF should have ORCIDs mandated. There is already a unique staff identifier provided, which is the HESA ID.

Q20. What comments do you have on the proposal to remove Category C as a category of eligible staff?

This is acceptable, but it should be noted that this institution does not have any embedded research council units or embedded NHS employees. As such, it is not affected by this change.
Q21. 13. What comments do you have on the definition of research assistants?

Excluding research assistants whose role is intended to support others in the delivery of research projects is a sensible aim. However, the key difficulty is in differentiating these staff from those on research contracts undertaking their own research. As noted above, the definition used in REF 2014 for these research independent staff was unhelpful and time-consuming, and did not take disciplinary differences into account. It might be more helpful to supplement the current definition by using other markers, such as the production of independent research outputs and use of staff grades, taking the view that HERA staff on the same grade should be submitted.

Q22. 14. What comments do you have on the proposal for staff on fractional contracts and is a minimum of 0.2 FTE appropriate?

Having a minimum appointment of 0.2 FTE is sensible, but it is not required if the link between outputs and staff has been truly broken (as suggested in para 47).

If it is the suggestion that staff on 0.2 FTE will need to have additional information provided for them, there is a danger that institutions would simply offer slightly higher FTE contracts in order to avoid this additional burden. This requirement should only be for staff who have an academic appointment elsewhere. If the requirement is for all part time contracts, this would be a major administrative burden.

Page 6: Collaboration

Q23. 15. What are your comments in relation to better supporting collaboration between academia and organisations beyond higher education in REF 2021?

The introduction of Impact case studies has already strengthened the links between academia and other institutions, and institutions are already rewarded via HEIF funding. One option would be to flag those outputs that had been produced with input from outside of academia, either by joint authorship or funding, and ensure that institutions comment on this figure and the nature of links within the environment template. Providing institutional level HEBCIS data to panels might be an option.

Page 7: Outputs

Q24. 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 post-date the submission deadline?

Yes

Comments:
Agreed; however a simpler solution would be to set a publication deadline in line with the submission deadline.
Q25. 17. What are your comments in relation to the assessment of interdisciplinary research in REF 2021?

It is difficult to answer this question without a clearer definition of what interdisciplinary research means. Is it research that sits between two research areas (e.g. mathematical modelling of biological systems) or large research projects that use the expertise of staff from a range of areas (e.g. describing a biological system using mathematical modelling, computer simulations and in vitro testing)?

Simply labelling a paper as “interdisciplinary” is not helpful: in the second case above, the research contributions from the existing fields are more easily understood but in the first case, contribution to a new field is the main driver, where the originality is in the creation of a new area for research.

It might be more helpful for all outputs marked as interdisciplinary to be required to submit additional information as to why they should be treated as interdisciplinary, hence underlining their originality.

However, this would almost certainly result in additional work for panels, while it is not clear that interdisciplinary research is assessed more harshly.

Q26. 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

Comments:
Where it is appropriate, providing data would be helpful; however it is not clear who would decide whether metrics are appropriate for specific disciplines. There may also be issues where metrics might be suitable for some sub-disciplines of combined panels but not for all areas (e.g. Pharmacy and Nursing), or where research could be submitted to different panels but metrics are only used for one of those UoAs (e.g. Environmental Science could be submitted to Earth Sciences or the Geography panel). In addition to the field-weighted citation impact, the percentage of top decile papers is also included as an indicator/metric. This will enable assessment of excellence complementary to FWCI (which is an average and therefore subject to potential skew).

Page 8: Impact

Q27. 19. Do you agree with the proposal to maintain consistency where possible with the REF 2014 impact assessment process?

Yes

Comments:
Yes, we agree.

Q28. 20. What comments do you have on the recommendation to broaden and deepen the definition of impact?

We are pleased to see the reiteration of the importance of impacts arising from public engagement and impacts on cultural life, but these categories were nonetheless already present in REF2014. It is unclear how the recommendation does actually broaden and deepen the definition of impact, especially as there is no reference to impact including major changes to an academic discipline.
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<th>Q29. 21. Do you agree with the proposal for the funding bodies and Research Councils UK to align their definition of academic and wider impact?</th>
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<td>Yes</td>
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**If yes, what comments do you have on the proposed definitions?**

It is helpful to align the RCUK and REF definitions of impact and we would welcome further information on the proposed definitions as soon as possible.

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<th>Q30. 22. What comments do you have on the criteria of reach and significance?</th>
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<td>The issue of the interaction of reach and significance was not well described or understood in the REF2014 guidance. Further detail on how this will be assessed in the guidance would be welcomed. This guidance will need to highlight the context of the impact, rather than strict metrics on numbers involved and potential numbers that could have been involved.</td>
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<th>Q31. 23. What do you think about having further guidance for public engagement impacts and what do you think would be helpful?</th>
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<td>Further guidance would be helpful, but it is not clear what additional information could be provided by REF. Whilst public engagement and dissemination of research are important, the difficulty with such case studies is in identifying the impact that they have. This relates to the previous question of reach and significance and the interaction between the two dimensions: how has public engagement been taken into account as part of the research project, rather than as passive public dissemination? It would be helpful for the assessment criteria to be able to recognise and give credit for cases where the public has been engaged early on in a research project, and helped to shape that project, rather than simply having been passive recipients at the end of the process. Guidance on how such public involvement might be captured and recognised would be welcome.</td>
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The Panel criteria must recognise that context is crucial in determining the reach and significance of public engagement; we would strongly argue against the introduction of any universal metrics for measuring the “worth” of a public-engagement-based case study. However, this must also be balanced with a need for consistency: it is important that sub-panels apply criteria consistently and value public-engagement-based case studies to an equal extent.

Could guidance or best practice be drawn from some of the strong case studies based around public engagement submitted to REF2014?

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<th>Q32. 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?</th>
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**Comments:**
Yes, especially as this encourages institutions to manage research and external relationships, rather than relying on individual academics (see question on external collaboration).

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<th>Q33. 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?</th>
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**Comments:**
We agree. It is better to have the information within the environment template than having the information in a separate template but not at the expense of compromising the level of detail that can be provided. It is important that UoAs are able to outline the full detail of the environment in which the specific case studies arose. Any erosion of the opportunity to set out the full impact environment for each UoA might skew the national picture of impact that emerges, especially given the likelihood that relatively few early-career researchers are likely to have fully developed case studies to submit, despite very often being heavily engaged in impact-related activity.
Q34. 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?

It is not clear what the actual proposal is. The question appears to be suggesting that the ratio of staff to case studies will increase, but does not give an indication as to what this figure is likely to be. It is important that the total number of case studies does not increase, so that there is no additional administrative burden.

There needs to be greater clarity regarding how the proposed institutional case studies might impact on UoA level case study numbers. If a UoA provides an institutional case study, this should count as one of the UoA level case studies as well. If not, there will be a tension between agreeing which case studies are submitted for a UoA and which should be deemed institutional level ones.

REF 2014 allowed the same case study to be submitted by 2 different UoAs if the underpinning research had been interdisciplinary and research from both UoAs had contributed. This principle should be retained and specifically permitted in the guidance i.e. that the case study should count towards the required totals for both submitting UoAs.

Where two different institutions have worked jointly on a research project with impact, it should also be permissible for both institutions to submit essentially the same case study (to the same UoA sub-panel), provided that relevant and qualifying research has been carried out at both. It should be at the discretion of the institutions involved whether such case studies are identical, or have a different institutional angle: either should be equally permissible. This should be made explicit in the guidance.

Q35. 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

Comments:
We agree that this would be a sensible development and ensure that the data needed for audit were included as part of the submission. It would also help if the audit requirements, specifically in relation to provision and type of evidence required for case studies, were clarified in the guidance.

Q36. 28. What comments do you have on the inclusion of further optional fields in the impact case study template?

The inclusion of further optional fields, such as funder or beneficiary, would be helpful in assessing the analysis of case studies post submission. However, these optional fields should be purely optional and the absence of any data should not be used to assess the quality of the case study. If the intention is not for these to be used in the assessment of the case studies (an intention we agree with), we question why these data are to be provided to the panels: once provided, information may have a subconscious influence on the assessment that is made.
Q37. 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?

Whilst this is supported in principle, it raises some issues, including how the quality of the research activity/body of work is to be measured, and how the concept of non-portability of impact from research could be audited when a member of staff moves institution. If the basis is a body of work, it is important still to be able fully to evidence the quality of the work in some way. A further question is how much of it would need to have been undertaken at the current institution? There should be very clear and consistent guidance on exactly how much research needs to have been undertaken at the current institution (e.g. at least one relevant output?). However this is determined, it should be acceptable for some relevant research that makes up a “body of work” to have been undertaken elsewhere.

It is not clear what research activity means in this context and how this activity and the body of work could be demonstrated to fall within the Impact research census period.

Q38. 30. Do you agree with the proposed timeframe for the underpinning research activity (1 January 2000 - 31 December 2020)?

Yes

Comments:
Yes, assuming that case studies which were submitted in REF 2014, but with on going impact, can still be submitted (provided the underpinning research is still within period). In REF 2014, there was concern that new areas of research for an institution were discriminated against as they were given no recognition for the fact that the amount of research (in the absence of a historic research track record) on which they could draw for case studies was reduced. This position should be reviewed. For example, could flexibility be introduced to reduce the number of case studies required to be submitted for a department that has been in existence only since post-1 January 2000?

Q39. 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?

There is an assumption in this question that a piece of research must be significant and original simply because it has impact; this assumption is flawed. The research output may be based on research from others and offer little in terms of further development.

A research paper may well be rigorous, but it does not hold that it is original or significant.

Q40. 32a. The suggestion to provide audit evidence to the panels?

The difficulty with the provision of the audit evidence was not in producing the evidence per se, but that the panels were not clear as to what evidence they could or should be requiring. Providing clearer information, prior to submission, on what might be reasonably requested or what should be included would be helpful and reduce the burden. We have some concerns that unless there are very specific instructions on what must be submitted, to require institutions to submit their audit evidence alongside case studies might lead to some submissions of vast volumes of evidence in order to try to “re-make” the case, which would both add to the panel’s burden and give unfair advantage to those able to provide such information. At the same time, there would need to be the facility to add a narrative to any audit evidence submitted if required, to explain the specific importance of the piece of evidence and/or which parts of it specifically pertain to the case. These needs must be carefully balanced with the provision of very specific guidance.

There also needs to be recognition as to the nature of some of the evidence and that some non-disclosure agreements need to be put in place. It is also assumed that REF 2021 will wish to publish the case studies via CC-BY licence, so that institutions must be made aware of this prior to submissions and can avoid copyright material being included in the case study.
Q41. 32b. The development of guidelines for the use and standard of quantitative data as evidence for impact?

We do not think that metrics for Impact are currently sufficiently robust for them to be used in the assessment of Impact. Where there are disciplinary-agreed ways of describing impact, such as those used by NICE (quality adjusted life years) or in economics (in terms of value added), it might be helpful for UoAs to agree where such a figure might be helpful and when it might be appropriate. However, these should be optional and there should be no detriment if such a figure is not included. Across-the-board metrics lack meaning and comparability in the wide-ranging contexts of non-academic impact.

Q42. 32c. Do you have any other comments on evidencing impacts in REF 2021?

Providing underpinning research outputs on a standardised format, such as that used for outputs, would be helpful and would allow outputs that support case studies to be analysed in more depth post submission.

Q43. 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 agree that case studies that were submitted in REF 2014 should be able to be submitted in REF 2021, provided that there is ongoing impact. It would not be acceptable if in expecting additional activity, the underlying and ongoing impact was discounted.

If a case study fits the other rules, it should be able to be submitted regardless of whether a similar case was submitted last time. We do not think there should be any limit imposed on the number of such case studies, and it may be difficult in any case to define where a case study is being "resubmitted" rather than simply related or similar to a 2014 ICS.

Page 9: Environment

Q44. 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

Comments:
Having a more structured template, in which UoAs are prompted to answer the questions posed in the criteria, would be helpful. Any metrics need to be put in the context of both the number of staff submitted and the number that are in the UoA, should staff selection be retained. There should also be metrics provided on disciplinary norms and distribution. These should be provided to institutions prior to submission, so that they are able to comment on the data.

Q45. 34b. Do you have suggestions of data already held by institutions that would provide panels with a valuable insight into the research environment?

HEBCIS data. Staffing data, such as the types of information provided for Athena Swan submissions.

Q46. 35. Do you have any comment on the ways in which the environment element can give more recognition to universities’ collaboration beyond higher education?

This should be addressed by the inclusion of the impact template in the environment.
Q47. 36. Do you agree with the proposals for providing additional credit to units for open access?

No

Comments:
This is dependent on whether this relates to policies or actual activity in relation to the number of outputs produced and the disciplinary mix. An institution may well have a policy to support open access monographs, but may not publish any. As such, no additional credit should be given.

Q48. 37. What comments do you have on ways to incentivise units to share and manage their research data more effectively?

Given that the Concordat on Open Access Research Data is seen as a set of principles, was only published in July 2016 and is aspirational rather than a compliance requirement from the Funding Councils, it would be inappropriate for this to form part of a REF Environment template for institutions to be rewarded in REF 2021. Any assessment would need to take into account the context of the research being undertaken, in relation to the legal, ethical and regulatory frameworks in place, and the scale of the research endeavour in terms of cost and time scales. This is captured in Principle 2 of the Concordat that recognises that open access to research data carries a significant cost, which should be respected by all parties, and the right of the creators of research data to reasonably expect first use so that there will be a reasonable delay between research being undertaken and data being made available.

However, what is missing from these discussions are the issues around robust research practices and research integrity, to ensure that data are managed effectively and efficiently. Strong and robust research integrity processes should be rewarded, including where good research data management plans are in place.

There is no question that REF is a behaviour modifier, in the sense that institutions pursue activities which will deliver good outputs and case studies for REF. However these proposals are specifically aimed at changing the behaviour of institutions and not measuring research excellence. We do not think that REF is the right tool to achieve this aim, and many initiatives are already in place to achieve these goals.

Page 10: Institutional level assessment
Q49. 38. What are your views on the introduction of institutional level assessment of impact and environment?

It is not clear what benefit or improved assessment would be provided by having an institutional level assessment. Is the expectation that such an assessment would cover all the institution or just those UoAs and staff that the institution has chosen to submit?

There will be issues in developing an institutional level assessment as it will need to take account of the range of activity across the institution. An institution with a large Science Faculty may well skew the figures on resources. Would such information provided at panel level rather than institutional level information be of more use?

The suggested weighting to be applied to institutional case studies is too high and will skew performance, especially for small submissions. We also have significant reservations regarding institutional case studies and their relationship to UoA case studies, as noted above.

The introduction of a special type of “interdisciplinary” or “institutional-level” case study is unnecessary. We believe that the 2014 mechanism was and is still adequate to allow inter-disciplinary impact to be submitted, provided that the same impact case study can be submitted by more than one UoA where it involves more than one discipline.

It is not clear from the consultation how the institutional environment would be assessed. In particular, there is an assumption that institutional level strategies and investment is applied equally across an institution and this is patently untrue, as Universities have different priorities at different times. It is therefore of concern that areas of strength and investment will be hidden in the averaging of the information. This would be exacerbated if the assessment were undertaken by a single panel, setting half of the environment score for each UoA.

Having a standard section on University policies and data within each UoA would be more acceptable.

Given the reference to data management, it would be helpful to request information on research integrity, which includes the robust management of research including data management.

Q50. 39. Do you have any comments on the factors that should be considered when piloting an institutional level assessment?

In addition to the actual forms, there should the outcome of the pilot should be applied to the REF 2014 results, in order that the implications of the changes can be understood across the sector.

As this is a pilot, there must be a sharing of the lessons learnt, so that there is no perception that those in the pilot have been given an advantage when writing their institutional submission. This includes feedback from those involved in assessing the pilot submissions.

Page 11: Outcomes and weighting

Q51. 40. What comments do you have on the proposed approach to creating the overall quality profile for each submission?

As noted above, there is concern regarding how the environment profile might be developed, as this would result in a flattening of performance across an institution. In relation to the impact profile, there is concern that there is conflation of interdisciplinary and institutional level case studies. Whilst we strongly support the need to ensure that significant interdisciplinary case studies are rewarded, the concept of institutional level case studies without a definition of what these would entail is harder to support.

Perhaps a methodology that allows case studies that are truly interdisciplinary to be given additional weight, such as the case for major research outputs, would be more reasonable.
Q52. 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

Comments:
Yes, otherwise the environment profile will not be sufficiently recognised. We are assuming that the environment template assessment includes the previous impact template information and the 5% on the Impact template relates to the proposed institutional case studies.

Q53. 42. Do you agree with the proposed split of the weightings between the institutional and submission level elements of impact and environment?

No

Comments:
No, the weighting for the institutional impact case studies is too high. There are also concerns regarding how the institutional level environment template would be developed and assessed. If this were institutional-level information, presented in a way that allowed the UoA-level context to be taken into account, it might be more acceptable.

Page 12: Proposed timetable for REF 2021

Q54. 43. What comments do you have on the proposed timetable for REF 2021?

If the proposed timetable is going to workable and deliver robust outcomes, the guidance giving the underpinning principles (such as non-portability and the definition of staff) needs to be made available as soon as possible.

Page 14: Contact details

Q56. 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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