Consultation on the Second Research Excellence Framework: University of Warwick Institutional Response

Section 1: Overall approach

Question 1: Do you have any comments on the proposal to maintain an overall continuity of approach with REF 2014, as outlined in paragraphs 10 and 23?

We welcome and support the proposal to maintain continuity in the overall approach. This is to allow for research quality to be measured consistently on the basis of the same methodology across REF cycles. However, we would contend that some of the proposals - for example, the issues raised in relation to decoupling of staff and outputs (question 9) and the proposed changes to portability of outputs (question 10) – could jeopardise this desire for overall continuity. It is arguably already too late to implement significant changes such as those outlined. Not only will some of the proposals be problematic for institutions to operationalise, but they will also potentially expose the REF to new avenues of ‘gaming’ which could have negative, unintended consequences for the credibility of the process and, therefore, for the sector as a whole. Given that the period until submission is now relatively short, whatever the outcome of this consultation, we would strongly urge that proportionate, steady reform is preferable to major change that could cause significant disruption.

Section 2: Unit of Assessment structure

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

We favour the existing, REF 2014 Unit of Assessment structure and recommend that it should be retained for REF 2021 to give a consistent approach to the assessment. However, we would recommend that the REF consider much more carefully how disciplines are entered for evaluation. Where disciplines do not have a clear place in the UoA structure, this creates significant problems for the discipline in terms of recognition, visibility, consistency of judgments and understanding of the nature and quality of research being done. The current REF structure serves some disciplines badly (for example Linguistics or History of Art) and there is a need for the panel structure to reflect better the ways that research is organised in and across disciplines so that REF supports research work in an appropriate way.

Section 3: Expert panels

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

No. We recommend that guidance on submissions be developed and released before the panel criteria, as in previous exercises. This will provide the sector with sufficient detail on the overall shape of the assessment framework at the earliest opportunity which will help HEIs to prepare.

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

We believe there is a need for flexibility so as to develop appropriate memberships and establish fairness of process. Specialists should be recruited at an early stage, as in REF 2014. It is important that panel and sub-panel members have as much time to prepare for the assessment as possible, and that the panel is given the opportunity to contribute to the setting of criteria. This ensures not only that the
criteria are drafted from a wide spread of disciplinary views, but also that a larger number of people are able to consult with subject communities over a somewhat longer period, thus providing greater refinement and legitimacy. Moreover, the earlier appointment of sub-panel members helps to occasion an appropriate level of engagement. We are aware of anecdotal evidence from some members of the academic community that panel members who joined late in REF 2014 were not as engaged as those involved from the start.

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

Yes. We are supportive of the move towards improving representation on panels. It is important that the panels command the respect of the research communities they assess. It could be argued that demographic information should be collected at the point of nomination to help diversify the panel membership. Some members of the academy have raised concerns that the proposed measures still do not fully address the problem, and we would therefore urge the HEFCE to consider ways it might further eliminate the potential for bias.

In addition, the University wishes to emphasise the need to avoid conflicts of interest on panels. We believe that it would be highly undesirable for a given panel to include representation by more than one individual from the same institution. Moreover, should a panel member move institutions during the REF period, and in so doing bring about such a conflict of interest, we believe they should immediately be asked to step down from the panel so that a replacement can be appointed. Finally, to avoid the risk of entrenching particular ideas or approaches, panels should not contain members who have been involved in 2 or more of the previous REF/RAE exercises.

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

Overall, the University favours retaining the current system and prefers the nomination of panel members by bodies such as learned societies and professional subject associations. Such professional organisations are more likely to reflect the range and diversity of disciplinary groups, and can provide the necessary range of nominees with appropriate specialist research interests. Nominations should also be sought from the national Academies and umbrella groups of heads of department, but their nominations are likely to be much more narrowly focused. The voice of the Sub-panel chair should be primary in selection, guided and monitored by the relevant Main Panel chair. The Sub-panel chair should submit a list of potential recruits with a written rationale as the basis for discussion with the Main Panel Chair, who will not necessarily have the detailed subject knowledge possessed by the Sub-Panel Chair. We would consider open nomination or self-nomination to be highly undesirable.

The person specification of ‘leading experts’ appointed to panels should include: extensive track-record of securing, undertaking and evaluating research, as well as an internationally-recognised presence in publication of many types (e.g. journal articles, books, reports etc.), a minimum number of successful supervisions of higher degrees by research and a demonstrable impact within academia and beyond. In summary, panel members should themselves be highly experienced in what is being assessed by the REF.
**Question 5b:** Do you agree with the proposal to require nominating bodies to provide equality and diversity information?

Yes. We would expect that this may go some way to addressing concerns raised by the academy that diversity, particularly in terms of the inclusion of BME groups, has not been seriously addressed in relation to REF2014.

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

Overall, we believe the method employed for REF2014 was broadly successful and, in the interest of maintaining consistency, recommend that the same approach be adopted for REF2021.

We also note the following amendments to the list of nominating bodies:

- The Joint Association of Classical Teachers has been discontinued since REF 2014 and amalgamated as part of the Classical Association and so should be deleted as a separate entity;
- The International Association of Teachers of English as a Foreign Language should be added.

**Section 4: Staff**

**Question 7:** Do you have any comments on the proposal to use HESA cost centres to map research-active staff to UOAs and are there any alternative approaches that should be considered?

We strongly disagree with the proposal to use HESA cost centres to map research-active staff to UoAs, and instead would favour the retention of the existing model whereby institutions are responsible for the mapping of their own staff to UoAs, to ensure that staff are assessed by the most appropriate sub-panel. There is widespread concern amongst the University’s academic community that HESA cost centres offer insufficient granularity for mapping research active staff to UoAs, as they do not represent the full disciplinary range involved in the REF. There are problems in making any calculations of disciplinary research strength from HESA figures. More fundamentally, a lack of correspondence between HESA categories and UoAs would render any automatic submission to a UoA based on HESA categories invalid. Furthermore, their use would be potentially problematic for the evaluation of interdisciplinary research and risks consolidating a disciplinary bias within REF.

We would also note concerns regarding the potential consequences of such a proposal for staff across the sector. It is unclear what strategies HEIs might adopt in order to further ‘game the system’ by enforcing changes to employment contracts; for example, the proposal may lead to more staff being moved onto Teaching Only contracts in order to render them ineligible for REF. Whilst it is acknowledged that HESA data could be used to identify shifts in employment patterns and therefore retrospectively shine a light on any controversial practices, this will be of little consolation to those staff affected. Apart from the possible reputational damage a given institution would encounter (if such practices were identified and publicised), it is doubtful that there is currently sufficient disincentive to discourage institutions from employing such tactics.
**Question 8:** What comments do you have on the proposed definition of ‘research-active’ staff?

We support the inclusion in REF of all research-active staff that independently lead their own research activity. We believe that the Stern definition, embodied in the statement ‘it is important that all academic staff who have any significant responsibility to undertake research are returned to the REF’ requires more precision. The definition of ‘Independent Researcher’ and ‘Research Assistant’ used in REF2014 are a good starting point, but more precision is required in the definition of ‘independence’. We believe that an ‘Independent Researcher’ would exhibit some, but not necessarily all, of the following characteristics:

- Ability to drive a programme of research or research project intellectually;
- Eligibility to apply for research grants;
- Eligibility to supervise PhD students;
- Leadership of publication of outputs.

We do not believe that HESA data, as currently formulated, is sufficiently nuanced to capture the complexity of identifying independent researchers, when disciplinary differences, diverse institutional contexts and different levels of experience are considered. It must be up to Institutions to retain the responsibility for identifying these researchers in the REF exercise.

We welcome the suggestion in Lord Stern’s report that single HESA statistics be used across both the REF and TEF, to ensure that there are no unintended incentives for institutions to seek to move academics off their existing multi-legged contracts or to favour fixed-term contracts as the default employment option.

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

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

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

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

The University welcomes the opportunity to submit variably across our staff and the greater flexibility intended by the proposed measures.

However, given the core aim to create a REF which delivers a meaningful indicator of the health of research activity within the UK HEI Sector, we would be uncomfortable with a minimum requirement of zero outputs for each member of staff; the only exception to this being Early Career Researchers for whom the submission of zero outputs should be allowed or other special categories of staff such as those moving into academia from industry or business. A minimum of at least one output per researcher, combined with a suitable mechanism to cater for a small number of cases where exceptional special circumstances have impacted a researcher’s ability to conduct research for a significant portion of the period for outputs, would not only avoid an increased potential for gaming the system, but also help to obtain a truer reflection of the research undertaken in a given UoA.

Furthermore, we are similarly uncomfortable with a higher upper limit of six outputs, which again would open avenues of potential gaming, but also allow for considerable over representation of certain individuals. In considering the average number of outputs required, this is not a matter of principle and the choice should be driven by volume calculations and the implication for workloads. There is a need to determine the likely increase in workloads resulting from the proposal for HEIs to submit all staff, and establish whether a reduction to 3 or 2 outputs is the optimal choice for securing workloads.
comparable with those in REF2014. Finally, on a related note, we would recommend that the REF2021 guidelines enable institutions to duplicate the submission of a given output where said output has multiple authors from the same institution AND where those multiple authors are all deemed significant contributors to the research.

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

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

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

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

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

*In principle, we are in favour of the proposed rules regarding the portability of outputs. We wish to see an exercise that captures and recognises the research being undertaken at a given institution as accurately as possible. There is also logic in the proposed approach, with the treatment of outputs consistent with the approach to non-portability of Impact. However, in practice, we anticipate that the proposed approach to operationalising non-portability may be particularly problematic to implement.*

(a) Acceptance for publication would not be a suitable marker because this is not routinely held in any form of departmental or institutional records, and it will be impossible to audit effectively. For example, acceptance letters are often personal correspondence between the author and the editor of the journal, and the University would not routinely have access to this information. Furthermore, acceptance for publication is not a formally recognised process in many disciplines. We therefore consider that Date of Publication is a more suitable marker and should be retained for REF2021;

(b) Please see the remarks above. Moreover, it should be noted that verifying the eligibility of outputs will undeniably place additional burden on institutions and therefore increase the overall cost of the exercise, running contrary to the stated underpinning principle of the proposed changes.

(c) Non-portability is likely to work to the detriment of Early Career Researchers if implemented without measures taken to mitigate this impact. If the proposals are taken forward for REF2021, ECRs should be exempt from non-portability rules in order that they can develop their careers without any unintended impediment due to the requirements of REF.

(d) We favour a model whereby institutions (that are eligible to submit to REF) can share the credit for outputs if an eligible member of academic staff transfers employment between UK Higher Education Institutions in the year leading up to the REF submission deadline.

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

Yes. However, we have concerns that this change will be implemented at too short notice for REF 2021. Sufficient warning needs to be given for all staff to set up their ORCID account and verify that all relevant outputs have been captured by that system. It should be noted that ORCID data are not perfect, especially where staff have made errors with their registration in the past, have changed their
name, or where publications (especially from conferences) have errors in the author listing, or where publications have simply not been picked up by the system.

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

Whilst we do not disagree with the proposal to remove Category C submissions, we strongly recommend that special circumstances of some form be retained for medicine as it is important to recognise the research undertaken by clinical staff working in University hospitals, generally employed by the NHS, but who make a valuable contribution to the research base. We would note that it is in the interest of British science to encourage academic development in the service, that it is in the interest of the service to encourage collaboration, and that their inclusion occasions a better representation of the vibrancy of the local research environment.

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

In the REF 2014 criteria, research assistants were defined generically as individuals “employed to carry out another individual's research programme rather than as independent researchers in their own right”. Broadly this definition is helpful, but would be complemented by an enhanced definition of the ‘independent researcher’ as de facto this sets out clearly what research assistants are not. To that end, please see our previous response to question 8.

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

We wish to see a REF that adequately reflects Research in the UK. On that basis, we therefore recognise the argument for raising the minimum FTE threshold for fractional contracts as we would consider it desirable that research-active staff involved in the exercise are sufficiently part of the research culture within their institution. However, it is vital to protect the interests of staff on flexible working contracts and to enable institutions to make legitimate partial appointments, where there are appropriate reasons for doing so. In the interests of securing these benefits and maintaining a consistent approach between REF cycles, the 0.2 FTE threshold should remain in place for REF2021. Whilst the University recognises the risk of ‘gaming’ associated with this feature of REF, we would contend that this potential cost is outweighed by the aforementioned benefits.

**Section 5: Collaboration**

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

In view of impact, public engagement and practice-based research this is to be welcomed. Many disciplines have an ongoing relationship with arts institutions/companies and it would be beneficial to acknowledge such research collaborations. However, the definitions of impact, rather than just environment, are of clear relevance. Certain kinds of collaboration, for example fundamental interdisciplinary research, are better supported by a process-based notion of impact - i.e. a focus on evidence of mutual engagement, rather than unidirectional influence from science on industry, or vice versa. Insofar as impact is evaluated at a different level (unit or member of staff) from environment (institutional) this may practically translate into a disincentive for collaborative research.
With respect to outputs, entrants from industry are, in effect, early career researchers and should be treated in the same way. The University sees no need for special consideration from other ECRs. With respect to Environment, such collaborations can be highlighted and discussed, though consideration would need to be given as to whether they are an aspect of ‘impact’ rather than the general research environment. Data on staff mobility would be of limited value without discipline-specific norms of mobility levels. However, data can be provided, with Sub-panels having the discretion to consider it and weigh it as they think appropriate.

During internal consultation members of the academic community requested clearer guidelines on the ethics of impact: ‘whilst departments are committed to communicating academic research beyond the academy, with the objective of bringing about positive change in society, we are mindful that recent political events such as Brexit and the US presidential election have had a polarising effect and thus have the potential to raise sensitive ethical questions about academic relationships with external stakeholders, especially stakeholders in government.’ Anecdotal evidence suggests that certain relationships, while ‘impactful’ in a REF sense, might generate a moral backlash from some sections of the staff and student body. Clearly, the last thing we want is for the impact agenda to initiate a process of splitting departments along political lines. Accordingly, we would encourage the HEFCE to include clearer guidelines on the ethics of impact.

Section 6: Outputs

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

Yes. This proposal is a sensible way to deal with outputs that do not get published in time; and would allow academics to include in-press material without having to worry about possible delays in work appearing that are outside their control.

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

We are strongly in favour of the appointment of interdisciplinary champions on the sub-panel although doubt that only one person could fulfil all needs. Indeed, we would suggest that more than one such champion would be beneficial and should be included. These interdisciplinary champions could be effective in encouraging an evaluative culture attuned to interdisciplinarity. However, further clarity regarding how these ‘champions’ will be appointed is required. Evidence from the academic community suggests that panel members may overestimate their own cross-disciplinary expertise, and so it is vital that the appointed ‘champions’ are appropriately trained to recognise the full variety of approaches to interdisciplinary working and are thus equipped with full range of expertise to warrant their inclusion. We would also emphasise that the cross referral of interdisciplinary outputs was largely effective in REF2014 and this feature should still be maintained for the next exercise. The REF2021 guidelines, however, should provide additional clarity to ensure that cross referral is used consistently across sub-panels.
Question 18: Do you agree with the proposal for using quantitative data to inform the assessment of outputs, where considered appropriate for the discipline? If you agree, have you any suggestions for data that could be provided to the panels at output and aggregate level?

The University welcomes the decision to retain peer review as the principal assessment method for outputs. Our view is that field-weighted citation metrics should only be used for Science disciplines, the exception being mathematical science where journal coverage is poor. Citations should not be used for Arts, Humanities and Social Science disciplines, the exception being Economics, as was the case in REF2014.

Section 7: Impact

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

We strongly agree with this proposal. Maintaining consistency with the REF2014 process is vital since impact by its very nature is long term. Moreover, the likely submission deadline for REF 2021 is not that far away, and so any significant changes in the REF 2014 impact assessment process could cause considerable additional burden and complexity. Impact can be inherently difficult to measure, and both REF panels and Universities devoted considerable resources to impact for the previous REF exercise. It could be very costly to introduce new procedures for REF2021. From this perspective, it is better to proceed incrementally. Ultimately, we would not wish to see radical change in this space.

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

We welcome the definition outlined in the consultation document as a move away from a narrower definition of impact towards a much broader one, particularly in terms of public engagement. Case studies describing impact arising from public engagement and impact on cultural life should be encouraged. However, while the rhetoric of ‘widening’ and ‘deepening’ the definition of impact is welcome, it also creates potential uncertainty around the impact agenda. Consistent, clear and robust guidelines that define impact should be published as soon as possible. The University would also welcome the ability to carry impact over from the previous REF as this would be beneficial for recognising the long-term strands of both research and engagement.

Question 21: Do you agree with the proposal for the funding bodies and Research Councils UK to align their definitions of academic and wider impact? If yes, what comments do you have on the proposed definitions?

We agree with the proposal for aligning the REF and RCUK definitions of impact. However, the term ‘wider’ may cause confusion and we suggest the title makes it clear economic and societal or non-academic impact is sought, and not ‘wider’ academic impact. In addition, public engagement is not mentioned in the consultation document’s definition of ‘wider impact’, for example inclusion of benefits to individuals, organisations and/or nations.
**Question 22:** What comments do you have on the criteria of reach and significance?

*The criteria of reach and significance are subjective and can be challenging. We would therefore welcome more clarity and improved transparency regarding the guidelines on criteria: for example, what constitutes appropriate evidence for impact? And assuming the same starred level scoring system from REF2014 is employed for REF2021, what would be deemed 4* impact for public engagement and 4* impact for public policy?*

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

*The term ‘public engagement impacts’ is not sufficiently clear; ‘Impact from public engagement’ is clearer, relating to the change resulting from public engagement. We would also wish to see a recognition that public engagement may itself constitute an impact, without the need to necessarily demonstrate or evidence changes arising.*

*In particular, further guidance on the following would be helpful:*
  - An improved definition of public engagement activities;
  - If public engagement itself can be impact, what evidence it is appropriate? What is auditable?
  - The types of evidence the Funding Bodies would accept to demonstrate the change in awareness following public engagement activities, for example what would acceptable measures of change in understanding be?
  - Examples of the types of acceptable evidence of impact arising from public engagement;
  - Real-life examples of how public engagement has led to the generation of impact, or has helped in evidencing impact;
  - Benchmarking information, for example what would be required for a 4*, 3*, 2* and 1* impacts from public engagement, and how this compares to other impacts such as influencing policy?
  - Improved transparency of how evidence will be scored: for example, what change would be needed for a 4*, 3*, 2* and 1* case study and what types of evidence would be required to demonstrate the change.
  - Improved consistency across panels.*

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

*As stated above, the University favours consistency in the approach taken to impact and therefore agrees with the proposal. However, Early Career Researchers should be exempted from the rules surrounding non-portability of impact.*

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

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

We agree the case study count should not be increased. Given our earlier opposition to the proposal to use HESA data for the purposes of defining research-active staff (see question 8) and mapping said research-active staff to UoAs (see question 7), it follows that we feel the use of HESA data to determine case study counts is wrong. We favour a model whereby the number of case studies required is determined at the institutional level, not at the UoA level. Institutions would then be able to distribute the allocation of case studies across subjects as appropriate, whilst retaining a minimum of one case study per UoA submitted.

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

Yes. Examples would be structured fields, grant numbers and individual items of underpinning evidence.

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

We support this proposal, providing that the HEFCE is mindful of the need to ensure that the number of optional fields does not become excessive.

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

In principle we support this proposal but guidance would be required on what constitutes ‘research activity’ and ‘bodies of work’. The terms are subjective and could be interpreted differently across sub-panels.

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

Yes.

**Question 31:** What are your views on the suggestion that the threshold criterion for underpinning research, research activity or a body of work should be based on standards of rigour? Do you have suggestions for how rigour could be assessed?

We agree that underpinning research must be assessed as having a high degree of rigour as determined by peer review. We also agree that the underpinning research should properly be evidenced as leading to the impact, even if not in a directly linear fashion. We are less convinced by the need to attach a quality indicator for an item of underpinning research as we consider that it is the quality of the impact of the research, including its reach and significance, that should be assessed in the exercise.
**Question 32:** Evaluation of REF 2014 found that provision of impact evidence was challenging for HEIs and panels. Do you have any comments on the following:

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

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

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

(a) Audit evidence would be gathered by institutions as part of the submission process, noting that it had to be collected for REF2014 in preparation for audit. The University would be supportive of making this available to the panels provided that appropriate confidentiality arrangements are in place. Indeed, given the significance of impact case studies, it is important that the panels are given as much audit evidence as possible which can help them make a robust assessment. However, it should be noted that this may prove burdensome on panel members.

(b) The development of guidelines for the use and standard of quantitative data as evidence for impact would be cautiously welcomed. It should be noted however, standards for quantitative data are likely to be difficult to implement and are likely to be burdensome to institutions and individuals. Guidelines would therefore be helpful and may improve consistency. In practice this is likely significantly to increase the workload associated with impact case studies. Furthermore, the excessive use of standardised metrics may have the effect of driving the content and narrative form of case studies thus reducing the breadth, richness and diversity of the sector’s submission. This would clearly be undesirable.

(c) More clarity is required on acceptable sources to evidence impact, particularly for impact resulting from public engagement. It would also be helpful to identify clearly whether an academic output would be acceptable evidence of impact e.g. an evaluation study demonstrating a change in practice.

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

Impact does not occur in seven year spells. Impact takes a significant time and we request a sensible balanced approach which encourages new impacts and values continued and further developed impacts submitted in the previous exercise. Entirely new impact case studies may be difficult for small submissions. Consistency will be important in assessment of the examples of impact in REF 2021 that were returned in REF 2014.

Clear guidance will be needed which details what would be acceptable for impact case studies building on REF 2014 impact case studies, e.g. responsibility for driving and delivering new impact, i.e. simply reporting on-going or growth since the previously reported impact or continuation and expansion of impact of the same nature.
Section 8: Environment

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

The environment element was very subjective in the past, and so the use of reasonable metrics for measuring it—particularly research income and PhD completions—seems valuable. There is more scope for structure, but this need not be only quantitative information. Quantitative data should be informative and indicative and not determine the assessment formulaically. Ultimately, as environment is inherently a qualitative entity, the narrative account must remain central to the environment template.

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

- Research income and sources of income as per REF 2014.
- PhD data (numbers of students, gender balance, PGR completions) *Institutional support to develop research e.g. new buildings, equipment fund, pump priming.
- Appointments information;
- *Early career support available;
- *Doctoral training available;
- *Indicators of undergraduate research.

*These indicators are generally qualitative.

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

We recommend a narrative-based description of collaboration beyond HE. This would describe for example links with industry, the local economy and NHS etc.

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

Whilst agreeing with the principle underlying Open Access, the University disagrees with the proposals. The open access policy is currently difficult to manage in a complex HEI. The date of acceptance of articles is contained in personal correspondence between the individual academic and publisher. It is virtually impossible to manage compliance centrally. Institutions should demonstrate compliance with the Concordat but there should be no specific credit for going beyond this at this stage. To do this would be to treat open access differently from other aspects of the environment assessment and in our view, this would currently be difficult to operationalise satisfactorily and fairly.
Question 37: What comments do you have on ways to incentivise units to share and manage their research data more effectively?

- There needs to be a recognition that efforts in this direction are not cost-neutral and necessitate substantial financial support, and a recognition of the additional burden placed on institutions;
- There is not a coherent definition of what is meant by “research data” at present, nor an accepted universal format for this to be presented or stored in. It should not form part of REF assessment at this stage;
- There are field specific constraints on data sharing (e.g. philosophy is different from anthropology) and there has not been sufficient bottom-up consultation to allow for these specificities to be reflected in open data policies;
- Research data in some disciplines, for example History or Art, involves copyrighted imagery, and this would pose legal problems for researchers;
- There are significant efforts both nationally and internationally to undertake consultations on Open Research Data in the HE Sector and it would seem premature for the HEFCE to make recommendations on this for REF2021 prior to these bodies publishing their conclusions.

Section 9: Institutional-level assessment

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

We are in favour of some of the more institution-wide aspects of the research environment being assessed at the institutional level, whilst retaining a strong element of submission at the UoA level too. However, we view the institutional-level assessment of impact as potentially problematic.

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

Piloting institutional level assessment of environment should be straightforward. Institutional-level Impact, however, is much more complex and deeply problematic. For example, there will be tensions between UoA level and institutional level submissions with UoAs “losing out” to institutional pressures. We would therefore factor in flexibility that allows some elements of impact to be submitted both at UoA and institutional levels, with appropriate narrative in both contexts.

Section 10: Outcomes and weighting

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

The approach should be kept consistent with REF2014. The key requirement is that any submitting unit within a University is clearly scored on their own impact and environment, in a way that can be presented separately from the overall score for the institution.

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

We agree that the weighting for outputs should remain at 65% and believe that the overall weighting for impact should be a maximum of 20 per cent.
Question 42: Do you agree with the proposed split of the weightings between the institutional and submission-level elements of impact and environment?

No, we disagree with the proposed split. The UoA environment quotient should be in the majority and thus greater than 7.5%. We believe a split of 10% for the submitting UoAs and 5% (at most) for the institution would seem more balanced. Furthermore, institutional-level case studies should not individually carry more weight than ones at the UoA level.

Section 11: Proposed timetable for REF 2021

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

The proposed timetable for REF 2021 is sensible provided that the final set of framework guidelines are published swiftly. During internal consultations, there was widespread concern amongst the University's academic community that guidelines for REF 2021 should have appeared much earlier in the cycle. A significant change like introducing institutional interdisciplinary impact case-studies should have been decided on and announced early in the assessment period.

Section 12: Other comments

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

Many of the proposals go beyond ‘continuity’ and introduce a number of new elements that may not have been thoroughly tested. (Institutional level case studies and profiles for the most part). It is arguably too late in the planning process to make such substantial changes (three months before panel chairs are appointed and one year before the final guidance needs to be published). This allows no time for testing and piloting of the various changes.