

Consultation on the second Research Excellence Framework: BU Response

1. Respondent details

Please indicate who you are responding on behalf of

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

Please provide the name of your organisation

Bournemouth University

2. Overall approach

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

We strongly favour the proposal to maintain an overall continuity of approach with REF 2014 and for any changes to be incremental. Although the overarching framework is largely consistent with REF 2014, the proposed changes are substantial. These changes would have a significant impact upon the way institutions manage their research portfolios, content and workload involved in preparing their submissions and the ultimate outcomes of the exercise. Consequently, we have concerns about the timing of these changes which, if confirmed in summer 2018 for an autumn 2020 submission, will happen two-thirds of the way through the assessment period. Universities are large, complex organisations and

realigning strategies and resources to accommodate significant external changes takes time.

Ideally, we would prefer to see incremental changes for REF 2021 (such as the broadening and deepening of the definition of impact), with the more significant changes (such as the inclusion of all staff, however defined) confirmed prior to the start of the post-REF 2021 assessment period. We urge the funding bodies to fully consider the impact on institutions before finalizing the proposed changes, and ensuring that all changes are in line with the stated aims of being incremental and not increasing the burden on institutions or panels.

One of the principles proposed in the Stern Review is the shift in focus of the REF from the individual to the institution. We understand the rationale underpinning this shift, and we support changes to reduce unnecessary pressure on individuals. However, we feel the funding bodies' proposals overcorrect the existing approach and we are concerned the increased focus on institutional performance will prevent the identification and reward of research excellence at unit-level.

We note that while the Stern Review recommended there be greater links between teaching and research, other than the changes to the definition of impact, there are no changes in the proposals that would strengthen this link. In fact, the impact of some of the proposals would be to further separate teaching and research, much to the detriment of the sector. We have highlighted areas in our response where we believe that action could be taken to strengthen these links further.

3. Unit of assessment structure

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

There was a significant reduction in the number of UOAs between RAE2008 and REF 2014. Whilst this undoubtedly resulted in some procedural efficiency, we believe this reduction went too far with some disciplines arguably losing their visibility in broader groups. The UOA structure should enable small and specialist areas of excellent research to be identified, rewarded, and invested in so they can grow and develop. We welcome the proposal to favour continuity over radical changes to the UOA structure and therefore only suggest two changes:

1. UOA 17: we support the concerns raised in the sub-panel overview report about the structure of this UOA and believe the merging of Archaeology with Geography and Environmental Studies resulted in an uncomfortable fit and reduced visibility for the wide range of subjects included. We support University Archaeology UK's (UAUK) proposal that Archaeology should again be a separate UOA. However, recognizing the desire not to expand the UOA structure, we suggest that Archaeology would make a better fit combined with Anthropology (UOA 24). The unit descriptors for both subjects include the application of research in a forensic context. Development Studies could be merged with Geography and Environmental Studies in a revised UOA 17.
2. UOA 36: we support the points made in the sub-panel overview report about this UOA being rather broad with the two areas of Communication, Culture and Media Studies and Library and Information Studies representing quite discrete areas of research without overlap. Our preference, therefore, would be for the two areas to be separated.

We are aware of discussions across the sector regarding the merging of the four Engineering disciplines into one UOA. We do not support this because of the wide variation between the disciplines and the

unwieldy size of a merged UOA (in REF 2014, for example, the four engineering UOAs assessed a total of 18,263 outputs, c. 10% of all outputs submitted).

We propose the REF UOA structure, which is widely understood and accepted in the academic community, is also used for the subject level assessment in the Teaching Excellence Framework (TEF). This would align REF with TEF and provide a common framework to enable the impact of research-led teaching to be demonstrated and evaluated. It may be that the UOAs need to be reviewed further in order to ensure they are workable as subject definitions for the TEF – including the changes we propose for UOA 17 above. Leisure and Tourism and Dentistry would also need to be considered as the UOA and the Common Aggregation Hierarchy used by HESA will not be consistent.

4. Expert panels

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

Yes

No

Comments:

We agree with the simultaneous development of the submissions guidance and the panel criteria, believing this would lead to the timely release of guidance to the sector and ensure consistency between the documents. However, we are concerned the breadth of the UOAs is too great, particularly in some disciplines, for one sub-panel member to fully represent their coverage. We endorse the level of detail given in the REF 2014 panel criteria documentation and wish to see this replicated for REF 2021. We therefore do not support the later appointment of the sub-panel members, believing their input (including research users) to be vital to the quality and clarity of the panel criteria documentation which should be developed alongside the submissions guidance.

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

Yes

No

Comments:

Our preference is for the sub-panel members to be involved in the development of the panel criteria and working methods documentation for the aforementioned reasons (Question 3a) and we would like to see them appointed as soon as possible.

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

Yes

No

Comments:

We agree with the proposed measures outlined at paragraph 35, however, we are disappointed these largely mirror the procedures for REF 2014 and, for the most part, are related to monitoring rather than actively addressing under-representation. The measures as they stand could result in a failure to address the representativeness of the future panels. The EDAP report (Equality and Diversity in the 2014 REF, 2015) recommended the identification of “ways of more effectively mainstreaming equality and diversity considerations amongst all participants, at all stages of the recruitment process.” We are concerned the proposals do not sufficiently meet this recommendation and would like to see more proactive ways of addressing under-representation.

Considering gender, for example, women were significantly under-represented on REF 2014 panels. UOA 25, for example, had just seven female sub-panel members (36%), one of whom left prior to the assessment year. Research demonstrates that women are much less likely than men to put themselves forward for leadership roles. Despite this, the recruitment process proposed for panel members requires individuals to put themselves forward, either by applying to be a chair or by lobbying nominating bodies to suggest them as a panel member. The proposed recruitment process does little to address these research findings.

In addition to ensuring the appropriate representation of gender and ethnicity in the panel membership, we stress the need for panels to be representative of the various types of universities and not be dominated by individuals employed at large research-intensive institutions. We are keen to see more panel members from countries outside of the UK, from those outside of academia (for all parts of the assessment) and those who are experienced in producing creative and practice-led outputs. Diverse and representative panels will add value to the whole REF process.

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

As stated in our response to Question 4, we would have preferred to see more proactive ways of addressing under-representation of the panels. However, considering the options described in paragraphs 36-38, we support using the nominations approach used in REF 2014 but with a larger pool of nominating bodies. In addition to subject communities and professional bodies making nominations, we think universities should be able to make nominations.

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

Yes

No

Comments:

We support nominating bodies being required to provide equality and diversity information, although we are not convinced this will address issues of under-representation or enhance inclusivity. If this goes ahead, the funding bodies should provide guidance to nominating bodies on what is appropriate in order to ensure consistency and transparency, and to minimise the burden on nominating bodies.

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

We believe the review of the list of nominating bodies would best be undertaken by the sub-panels in conjunction with their subject communities.

In the meantime, we propose the addition of:

- Association for Events Management Education - <http://www.aeme.org/>
- Association of British Travel Agents (ABTA) - <http://abta.com/>
- Association of Event Organisers - <http://www.aeo.org.uk/>
- Association of Leading Visitor Attractions - <http://www.alva.org.uk/>
- Association of Licensed Multiple Retailers - <http://www.almr.org.uk/>
- British Beer and Pub Association - <http://www.beerandpub.com/>
- British Destinations - <https://britishdestinations.net/>
- Business Visits and Events Partnership - <https://www.businessvisitsandeventspartnership.com/>
- Inter-American Development Bank - <http://www.iadb.org/>
- Tourism Alliance - <http://tourismalliance.com/>
- UKinbound - <http://www.ukinbound.org/>
- VisitBritain - <https://www.visitbritain.com/>
- Women in Film and Television - <https://wftv.org.uk/>
- Writers Guild UK - <https://writersguild.org.uk/>

We suggest the following nominating body is removed from the list: Business Development & Events Manager [it has either changed name or ceased to exist, if it ever did].

5. Staff

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

We strongly disagree with this proposal, echoing the discontent across the sector. The HESA cost centres were not designed for research and therefore the mapping of one to the other is often inaccurate. An

individual's teaching is sometimes in a different discipline to their research, for example, a computer animation academic might be returned to the computer science HESA cost centre (#121) for their teaching but to REF UOA 34 (Art and Design) for their research. The mapping between some HESA cost centres and REF UOAs is poor, particularly in the health and social care disciplines.

Some academic staff are returned to non-specific HESA cost centres that do not map to UOAs (for example, cost centres 201 and 202). Universities might wish to make submissions to UOAs that map to HESA cost centres to which they do not return staff, for example, a university may no longer have an education department but might wish to make a submission to UOA 25. An automatic mapping of HESA cost centre to UOA would prevent an institution from making informed decisions in respect of where research best fits. We believe this crude mapping would be a barrier to encouraging interdisciplinary research as researchers may feel bound by the rigidity of the mapping and disciplinary silos. It also has the potential to create a further incentive for institutions to push staff into teaching only roles, to manage the consequences of this artificial mapping.

At Bournemouth University we submit academic staff to 17 HESA cost centres as these best match our teaching portfolio, however, we would want to submit to fewer REF UOAs, believing these to best match our research areas. Looking at the HESA and REF data, this pattern would be repeated across the sector with automatic mapping resulting in a significantly larger number of submissions compared with REF 2014 (anecdotal evidence estimates this would increase the total submissions from 1,900 to 2,500). Some of these submissions would be small and/or unlinked groups of staff. This would increase the burden on institutions (more submissions to prepare) and sub-panels (more submissions to review) which defeats the stated aim of minimising burden. Using the HESA data for this purpose could result in universities changing their HESA coding to ensure a better fit to the UOAs to which they wish to submit to REF.

We strongly believe that universities should decide in which UOAs to make submissions. If the proposal to submit all staff is approved and there is a desire to use the HESA data then we suggest the average FTE totals are derived from the HESA data but universities are given the flexibility to allocate these to UOAs, providing the total FTE remains the same. This could operate in a similar manner to how universities allocated their total research income returned to the HESA FSR to UOAs in REF 2014.

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

At Bournemouth University we strongly believe that the role of the university is to engage in knowledge creation which informs and contributes to education as well as delivering impact in society. We therefore believe that all staff should engage in education, research and, in our case (although we reflect that this may not be universal elsewhere in the sector), professional practice. On that basis, all staff engaged in teaching or research or both should be considered in the REF. Any policy that does not reflect this seriously compromises the credibility of the REF as it opens it to game-playing and strategizing, and contributes to a further split between research and education in higher education to the detriment of students. We therefore strongly believe that the REF should include all academic staff, regardless of the academic function returned to HESA. This would also better support alignment with the TEF, particularly if UOAs were used as TEF subject levels as we have suggested above.

The definition of 'research-active' staff described in paragraph 43 is therefore inadequate, as is the

proposed solution discussed in the press of asking universities to agree and publish a definition for their own purposes. We share sector concerns that using the proposed definition will result in some universities moving staff onto teaching-only contracts, separating teaching from research - despite the Stern review recommending that they should be more aligned - as well as being potentially damaging to the careers of those affected by such a change in their contract. This is potentially just as divisive as, and more damaging than, staff selection in REF 2014.

We therefore believe that the exercise should either be fully inclusive (including teaching-only staff with no exceptions) or fully selective (with institutions given the choice of whom to submit). If it is fully selective, which avoids the more damaging compromise of partial inclusion, we propose that the proportion and numbers of staff on teaching-only, research-only or research and teaching contracts for each UOA is considered in the REF assessment.

We believe it to be somewhat naïve to assume that the inclusion of all research-active staff would mitigate equality and diversity issues. It is more likely these would be driven underground and for under-represented groups to be further disadvantaged such as by moving individuals onto teaching-only contracts. HESA data (2014-15) shows women are already more likely to be on teaching-only contracts than men.

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

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

We support decoupling, believing this will encourage a more inclusive and collaborative REF approach. One potential consequence is the possibility of staff with no outputs being added as co-authors to outputs as a token gesture. This could be mitigated by requiring a statement of contribution for individuals linked to outputs with a significant number of co-authors (similar to the REF 2014 Main Panel A measures but adopted across all UOAs).

Inclusivity could shift how an individual's employability is linked to REF. Under the current arrangements, selection for submission to the REF can enhance an individual's employability (with non-selection stigmatised). Under the proposed arrangements, an individual's employability could be enhanced by the number of their outputs selected for submission (thus stigmatising zero/low outputs). Equality and diversity issues affecting an individual's ability to produce a higher quantity of outputs then come to the fore, having been disguised during the REF process. One of the perceived benefits of inclusivity is a reduction in the burden associated with assessing individual staff circumstances, however, this process was one of the great successes of REF 2014. Although burdensome in terms of time and process, it raised the profile of equality and diversity, resulting in positive benefits across the sector.

The proposal to require an average of two outputs per academic FTE sounds sensible as it allows individuals to contribute to the submission according to their varied workloads. However, a crude analysis of the HESA data shows the proposed definitions and thresholds would significantly increase the number of outputs submitted. Using 2014-15 HESA data as an example: if the 133,550 FTE staff were returned with academic functions of research-only or teaching and research, with two outputs per FTE it would result in a required submission of 267,100 outputs (an increase of 75,950, 40% compared to REF 2014). Applying the formula to specific institutions shows some strange results and presumably unwanted outcomes: the LSE, for example, would see a decrease in submitted outputs from 1,948 to 1,690 (13%); Southampton Solent would see an increase from 160 to 1,098 (586%); Bournemouth

University would see an increase from 558 to 1,172 outputs (110%). The Stern Review recommended not to increase the number of outputs submitted to REF 2021 compared to REF 2014. Applying the averaging approach in the context of inclusivity indicates it is unrefined, resulting in a significant increase in outputs submitted, mainly from non-research intensive universities.

One flaw identified is the conflict between using FTE to calculate the total number of outputs and using headcount to determine thresholds for the minimum/maximum number of outputs. This disadvantages units with a high proportion of staff on fractional contracts, each of whom could be required to submit the minimum number of outputs. There is a dependency between the average number of outputs and other proposals in this consultation (such as inclusivity and the definition of research-active staff). These need to be considered holistically to ensure the number of outputs (per institution and for the exercise as a whole) don't increase substantially.

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

We support the proposal to impose a maximum number of outputs for each staff member and agree this would avoid submissions whereby a small proportion of staff are responsible for the majority of the outputs. It would also limit over-production of outputs and encourage collaboration. We note the growing concern in the sector that the REF contributes to the 'publish or perish' culture which has implications for research quality and integrity. In recognition of the connection between this question and Question 9a, we suggest a maximum of three times the average number of outputs, rather than proposing an absolute number at this stage.

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

The only way to truly break the link between staff and outputs is to permit staff to be submitted with zero outputs. Having a minimum of one or more outputs per staff member would not break the link because all staff would have to be linked back to at least one output upon submission. There will always be a need for staff to be submitted with zero outputs, for example, staff joining a university in the year of submission (assuming non-portability stays). An exceptions procedure could be introduced for these cases, however, this would increase the burden to institutions and panels; permitting zero outputs would remove this. A staffing section in the environment template could be used to explain the proportion of staff included with zero outputs. We understand the argument that some institutions could choose to submit staff with zero outputs to a 'sacrificial UOA', however, we believe most institutions would not act in this way because of the risks to staff morale and external reputation by doing so.

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

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?

On the whole, we welcome the underpinning principle of non-portability of outputs and the acknowledgement that universities should be able to submit outputs produced by staff whilst in their employment. Philosophically, therefore, we understand the appeal of using the acceptance for publication date as a timely and largely accurate marker to link outputs to institutions. In practice, however, acceptance dates are virtually impossible to verify because they are not systematically collected by, or made available to, institutions. A process based on acceptance dates would be difficult to implement and audit. We point to the REF Open Access Policy which originally aimed to use the date of acceptance from 2016, only to delay this for two years and instead use the date of publication, based on the sector-wide difficulties in using the acceptance date.

Using the date of publication would be more robust and transparent and would be better supported by existing systems and processes in place in institutions, such as the automated harvesting of outputs by publication management systems. However, publication can take place a long time after an output is produced, during which time an individual could transfer institutions. The publication date is therefore a less accurate marker to link outputs to institutions.

We also note some outputs do not have acceptance dates or equivalent, for example, exhibitions, performances, portfolios, datasets, artefacts, etc. Some of these will also not have a publication date.

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

If date of acceptance were the chosen marker, Bournemouth University would face a number of challenges in the verification of eligible outputs as these dates are not comprehensively recorded or automatically harvested by our publications management system. Any evidence of acceptance would be direct communication between the publisher and the author (except in a small number of cases), so we would be unlikely to be able to verify acceptance dates for outputs, particularly where staff have left the university.

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

We support the proposal for non-portability and see this as being positive for the health of the sector by supporting a sustainable and less volatile environment. It might improve recruitment practices by focusing more on potential, thus enabling new academics to enter the academy. It could change the peak in recruitment to after the publication of the REF results, rather than the year prior to submission; this is not such a bad thing. A peak of recruitment at the beginning of the REF cycle would provide universities with a greater impetus to retain staff and create vibrant and sustainable research environments.

The debate has brought to the surface a number of questions about the ownership of outputs and whether this lies with the institution or individual. Most university IP policies state outputs produced by individuals in their employment are owned by the university but with the rights granted back to the individual so they can publish. Non-portability would still enable individuals to be credited for their outputs (particularly in demonstration of their future potential) whilst providing incentives to universities

to respect and retain staff.

However, there are concerns about how this would work in practice and the potential consequences for those who are: ECRs; on fixed-term contracts; made redundant. ECRs, for example, rely heavily on their outputs when securing permanent positions and often don't have other forms of research capital, such as grants, which non-ECRs may have. If these groups were exempt from the non-portability rule (our preference) then the REF guidance would need to include clear definitions for each group.

We are concerned about the submission of certain output types relating to staff who have left the institution. For some output types, such as journal articles, this is straightforward. However, for other output types, such as exhibitions, this would be more difficult. For example, a practice-based academic in UOA 34 might submit an output presented in the form of a portfolio. This is a deeply personal item to create and it is unlikely this could be done by someone other than the author. If they have left the institution then this would cause problems and could result in excellent research not being submitted. Given time, institutions could mitigate this by supporting academic staff to create records/portfolios of such outputs during the course of the REF period, rather than prior to submission, however this change to practice would need time to embed.

Our final point is around equality and diversity and output volume. If portability remains part of REF 2021 then equality and diversity issues need careful consideration. An individual whose volume of outputs has been constrained (for example, due to parental leave or long-term sickness) will have less research capital than an individual whose output volume has not been constrained. In an inclusive REF with portability, the latter individual would be more advantaged in the job market, thus putting those with valid staff circumstances at a disadvantage and potentially further marginalising under-represented groups.

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

We agree with the principle of sharing outputs proportionately across institutions, however, we have concerns about how this could work in practice. There is insufficient detail provided in the consultation document and we feel it needs considerable further discussion before any decisions can be made.

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

Yes

No

Comments:

We are extremely supportive of mandating ORCID as the staff identifier for REF 2021. There is good uptake of ORCID across the sector, it is increasingly being used elsewhere (for example, when submitting to a journal), and it is free and non-proprietary. We acknowledge that some individuals may object to the requirement of having an ORCID on personal grounds but feel this would be a small proportion. Another

concern is the technical challenge that universities will face in the implementation of a mandatory ORCID for all research-active staff as it is currently not mandatory for other returns / requirements. We therefore suggest that the ORCID field in the HESA Staff Collection is made mandatory from 2018.

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

We support the removal of Category C as a category of eligible staff. We note some concern this could disadvantage collaborations outside of academia and therefore suggest this is reviewed in conjunction with Question 15 to ensure REF 2021 has sufficiently robust mechanisms for including, assessing and rewarding these collaborations. We also suggest consideration is given to whether to permit the inclusion of outputs from former members of staff, such as: i) those who have retired but still undertake research in the unit, such as Emeritus Professors; ii) those who died during the assessment period; and, iii) those who have ceased employment during the assessment period, for example, due to ill health or caring responsibilities. These staff are part of the story and research culture of the unit and their outputs should be eligible for submission.

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

The REF 2014 guidance on the inclusion of research assistants was unclear and raised a number of queries as part of our REF preparations. The guidance described research assistants as staff who were “[not] independent researchers in their own right” and who were only eligible for submission if “they [were] named as principal investigator or equivalent on a research grant or significant piece of research work”; this was ambiguous and unhelpful. The guidance also stated “research assistants must not be listed as Category A staff purely on the basis that they [were] named on one or more research outputs”. In many universities this could equally be applied to academic staff as not all academic staff are principal investigators on research grants. This is true at Bournemouth University whereby some of our academic staff are producing research outputs but are not principal investigators. With this in mind it seems contradictory to propose institutions could choose not to include research assistants who didn’t meet the definition when, on the other hand, all academic staff must be included regardless of whether they meet the definition.

Therefore, as per our response to Question 8, we do not believe there should be “an element of interpretation or judgement” regarding the inclusion of research assistants. This would introduce a layer of ambiguity and the process would revert back to one of staff selection. We believe the exercise should either be fully inclusive (with no exceptions, even for research assistants) or fully selective (with institutions given the choice of whom to submit, including research assistants).

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

Having the opportunity to include staff on fractional contracts is important and welcome. Where these contracts are 0.2 FTE, we understand the rationale for requiring a short statement outlining the connection of such staff to the submitted unit and support this in practice. This requirement could be built into the environment template so it forms part of the unit's staffing narrative. If there is a concern that institutions might game-play by recruiting staff on 0.2 FTE contracts solely for the purposes of the REF then perhaps there could be a requirement that such staff have been in post at the institution for a minimum duration (two years?) prior to the census date to encourage stability.

As per our response to Question 9a, we feel there is a conflict between using FTE to calculate the total number of outputs required and using headcount to determine the thresholds for the minimum/maximum number of outputs. This could disadvantage units with a high proportion of staff on fractional contracts (such as in the creative arts), each of whom could be required to submit the minimum number of outputs. This is further evidence to support our suggestion to permit the submission of staff with zero outputs, as per our answer to Question 9c.

6. Collaboration

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

In accordance with our view of the importance of professional practice, we strongly support the REF being used to better encourage, recognise and reward collaboration between academia and organisations beyond HE, and agree the environment element is a suitable location for this. We suggest the following indicators:

- Staff mobility (inward and outward)
- Links with relevant industrial partners in the UK and further afield
- Publications co-authored by colleagues in academia and other sectors
- Collaborative research projects that including a contribution (monetary or in-kind) from outside of academia
- Academic participation in the governance of organizations in other sectors

Some of the data returned to the annual HE-BCI survey could be included in the REF, for example, information on collaborative and contract research, consultancy, CPD and IP/commercialisation.

Whilst we agree in principle with the proposal that staff moving into academia from other sectors would not be disadvantaged due to the proposed flexibility in the number of outputs, we think this blanket approach misses the differences in practice between disciplines. Whilst the number of staff to which this would apply is relatively small in some disciplines, in others it will apply to a significant proportion (and, in some cases, the majority) of staff. At Bournemouth University, one of the great strengths of our nursing and midwifery unit is that most of our academic staff come from a practitioner background.

These staff are unlikely to be in a position to start producing outputs upon appointment, especially as many of them embark on PhDs when they join us. With this in mind, we believe units that appoint a large number of staff from outside of academia would be disadvantaged by the proposal. We support the recommendation made in the Dowling Review and would be keen to see allowances in terms of reductions to the total number of outputs a unit should submit, based on the number of staff joining the unit from outside of academia during the assessment period. This information could be supplied in advance of the submission date (perhaps in the survey of submission intentions) and used to calculate the necessary output reductions.

7. Outputs

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

Yes

No

Comments:

We support the submission of a reserve output in cases where publication of the preferred output will postdate the REF 2021 submission deadline. We believe this would alleviate the issues associated with publishing outputs around the submission date and the anticipated start of the next assessment period, normally a period of c. two months.

Assuming reserve outputs will be permitted in REF 2021, this leaves a legacy issue unique to the cross-over between REF 2014 and REF 2021. Many institutions did not take the risk of submitting outputs due out in late 2013 in case their publication was uncontrollably delayed until 1st January 2014 or beyond. Some high-quality outputs could therefore have fallen between submissions, potentially being deemed too risky to submit to REF 2014 but published prior to the start of the REF 2021 assessment period. We therefore propose that, for REF 2021 only, outputs published in the second half of 2013 (that were not submitted to REF 2014) are eligible for submission to REF 2021.

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

We support any move that recognises the value and importance of interdisciplinary research and welcome initiatives that contribute towards this. REF 2014 made significant and valuable advances to raise the profile and importance of interdisciplinary research and we were pleased to read the REF team's analysis that demonstrated there were no significant differences in scoring patterns between research flagged by institutions as interdisciplinary and other types of research. The main panel overview reports state the sub-panels felt, on the whole, they had the expertise to assess the majority of the interdisciplinary outputs received and the right mechanisms to cross-refer them if they did not have the

expertise.

We therefore agree the arrangements introduced for REF 2014 should continue to REF 2021. We support the additional arrangements proposed in the consultation document, but are wary that too much of an emphasis on interdisciplinary research could disadvantage outputs that represent single disciplinary research, however strong these outputs are.

In terms of the additional arrangements proposed, we support the appointment of interdisciplinary champions, although we question whether these are necessary at sub-panel level. Feedback from the REF 2014 sub-panels stated they felt they had significant expertise and experience in interdisciplinary research. Mandating the 'interdisciplinary identifier' field would bring some benefits to the identification of interdisciplinary outputs, however, the quality of the data collected would be highly dependent on how institutions interpreted the guidance on this and there are issues with the widespread ambiguity around the definition of 'interdisciplinary research'. We are most supportive of the proposal to include an explicit section in the environment template for explaining how the unit supports and encourages interdisciplinary research, believing this would encourage further engagement in interdisciplinary research and reward interdisciplinary collaborations.

A number of the main panels highlighted the value of cross panel membership and we suggest this continues and expands for REF 2021. In addition, we suggest that, prior to the recruitment of the sub-panels, an exercise is undertaken to map the disciplinary interfaces between UOAs based on the REF 2014 submissions. This would further support the recruitment of sub-panel members with the appropriate expertise, for example, ensuring computer scientists were appointed to the UOA 34 (Art and Design) sub-panel to assess computer animation outputs.

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

Yes

No

Comments:

The main challenges of using metrics to determine output quality are well-rehearsed. Metrics in some disciplines (particularly the arts, humanities, social sciences) are not yet robust enough to replace, or even inform, peer review, especially as the indexing of publications in these disciplines is so sporadic. There are many disciplines where journal articles are not the main outlet and where outputs, such as artefacts, would be exempt from metrics. Moving to a largely or wholly metrics-based approach, even if just to inform output assessment, would potentially hinder, or at worst exclude, these disciplines and output types. It could distort the publishing behaviour of academics in these fields, for example, by pressuring them to publish in journals rather than books. We support the recommendation of the *Metric Tide* report (2015) that metrics cannot replace the nuanced judgements on the output quality that peer review currently provides.

That said, we support metrics being used to inform peer review of outputs in some disciplines, providing: i) the sub-panel members have been suitably trained in their use; ii) the disciplinary communities are consulted on if/how/which metrics should be used; iii) metrics are normalised by discipline wherever possible; iv) measures are implemented to ensure the use of metrics doesn't impact negatively on the assessment of interdisciplinary research; and, v) the use of metrics is open, transparent and confirmed prior to assessment.

With reference to the last point, some REF 2014 sub-panel members have been candid about how metrics other than those specified in the guidance, such as journal rankings, were used to inform peer review in their UOAs. This calls into question the integrity and transparency of the assessment process, and is something that shouldn't be repeated in REF 2021.

For UOAs that do not use quantitative metrics to inform peer review, we would like to see some guidance and/or examples of what could constitute a 4* output. For example, information would be welcome on how a sub-panel would assess a performance and what they would perceive to be markers or evidence of the different star levels.

8. Impact

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

Yes

No

Comments:

We believe it is essential to maintain consistency with REF 2014, wherever possible, with regard to impact. The sector has moved a long way from the distrust and then apathy towards impact, witnessed during the REF 2014 assessment period, and there is now a more positive view and acceptance of impact. We are concerned that significant changes to the approach to impact could undo the progress made and risk disengagement with the impact agenda. A further benefit of consistency is the opportunity to make comparisons and observe trends over time. Identifying impact trends and demonstrating long-term impacts will help to evidence the outcome of public investment in research. Understanding of impact, however, remains pretty ambiguous and it is therefore critical that impact guidance is produced early and remains largely consistent.

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

We are in favour of the broadening and deepening of the definition of impact, although we acknowledge that the definition was already fairly broad and deep. We note the submitted case studies demonstrate that, for the most part, institutions submitted a somewhat narrow range of impacts. There was, and arguably still is, a sector-wide assumption that case studies with an economic focus and quantitative evidence based are likely to score more highly. Thus we would welcome greater training and guidance for panel members and institutions as to the full remit of the definition of impact, particularly in terms of the less frequently submitted and emergent types of impact such as public engagement, engagement via online/virtual mechanisms, mass media, etc.

We suggest two areas where there is potential scope for broadening and deepening the definition of impact: i) recognition for knowledge exchange activity and how this supports a culture of impactful research; and ii) incorporating the impact of research-led teaching where this has led to societal and economic impact, for example, by enriching particular areas of industry. In terms of the former, we note there are already mechanisms to recognise wider knowledge exchange activities (such as the annual HE-BCI survey), however, including this in a broader definition of research impact for REF 2021 would raise the profile of the full breadth of knowledge exchange and ensure greater academic engagement. As per our answer to Question 15, there are areas of overlap and synergy between REF and HE-BCI and we suggest these are explored further. With regard to recognition of the impact of research-led teaching, we believe that including this in the definition of impact for REF 2021 would further align research and education and provide strong linkages with the TEF.

We do not agree with including academic impacts in the impact definition for REF as there are already mechanisms to recognise and reward this in the outputs element and its inclusion in the impact section has the potential to cause confusion. We believe that demonstrating the creation of a new paradigm will be exceptionally rare and near impossible to evidence so its inclusion in the impact definition would bring limited benefit. There is also concern that academic impact case studies would score poorly in comparison to wider economic and societal impacts.

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

Yes

No

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

We support the proposal for the funding bodies and Research Councils UK to align their definition of academic and wider impact. This encourages clarity within the sector and will help to avoid conflicting

pressures on academics. We are aware of concerns from some disciplines that aligning the definitions might result in Research Councils UK placing a greater weighting and/or emphasis on wider impact as part of their assessment of applications, and seek assurances that this would not be the case.

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

We would like to see more rigorous definitions of reach and significance, illustrated with examples, in the REF 2021 guidance. In particular, we note ambiguity in terms of how the criteria of 'reach' was (and will be) understood and applied. Improved criteria at main panel, and in some cases sub-panel, level will be particularly welcomed. In addition we suggest clarification is provided as to whether reach and significance are considered equal. Anecdotal evidence suggests reach was perhaps undervalued in comparison to significance in REF 2014. Clarification is also sought on whether impact case studies could achieve a high star rating on the basis of reach or significance alone (our preference), or whether the case studies should have some combination of the two. If the latter, guidance is sought on how these combined judgements are made and translated into star ratings. Ideally we would like to see a flexible approach whereby reach and significance are evaluated independently, with credit awarded for substantive levels of either.

It was also noted that Brexit could slow or remove the ability to ensure European reach arising from research, therefore, mechanisms to support researchers to continue knowledge exchange across Europe would be welcomed.

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

As per our answer to Question 20, we think it would be helpful for guidance to include more detail of the assessment of impacts from public engagement, as well as illustrative examples as to demonstrate the range of ways in which impact from public engagement might take affect and evidence that could be provided. Anecdotal feedback from colleagues in our university and across the sector confirms that the submission of public engagement case studies to REF 2014 was risky and, as such, some potentially strong case studies were not submitted.

We note confusion among academics on the distinction between dissemination and impact for public engagement activities. This is compounded by the perception that some of the REF 2014 public engagement impact case studies were scored 4*, despite appearing to be based on dissemination activity (such as media coverage) with limited evidence of active public engagement and therefore, arguably, impact. Further guidance on the distinction, and indeed relationship, between dissemination, active public engagement and impact evidence would be welcome. This should detail how public engagement will be evaluated and provide examples as to how different forms of public engagement will be valued and scored. For example, we suggest the guidance includes a clear statement on the value of agency of audiences in choosing to engage with a particular initiative so that where it can be demonstrated that people have made a conscious decision to engage with such an initiative, as opposed to a statement that material has been made available, credit should be given to the former. The guidance could include details of different types of public engagement (see for example the NCCPE's helpful summary in ['Engaging publics with research'](#) which refers to different approaches including: enlightenment and

empathy, social innovation and social action).

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

Yes

No

Comments:

We agree with the proposal that impacts should remain eligible for submission by the institution or institutions in which the underpinning research has been conducted. This is especially pertinent bearing in mind the proposal for impact case studies to be based on bodies of research, rather than individual outputs. We would, however, like to see some flexibility around shared ownership for situations where an institution has demonstrably invested in accelerating and achieving particular impacts but where the original underpinning research was undertaken elsewhere. For example, new units whereby most staff are relatively new to the institution, having published prior to joining, but where the new institution has largely/wholly invested in achieving the impacts from their collective outputs. The REF 2014 guidelines on this disadvantage new units / institutions without a long history of undertaking research. There is a risk that the current impact ownership rules could discourage institutions from investing in new areas. We feel this is in conflict with the REF/QR aim of encouraging and building new areas of research. Introducing some flexibility to impact ownership would send a clear signal to institutions that the REF values new areas of research and won't penalise universities for creating new units and investing in impact (which, under the current rules, would not be eligible for submission by the new unit).

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

Yes

No

Comments:

We agreed that the approach to supporting and enabling impact should be captured as an explicit section of the environment element of the assessment. This would help reduce repetition and ensure impact is embedded in the unit's overall strategy. This will allow the reporting of linkages to demonstrate how the research environment has directly supported and enabled greater research impact. We also note anecdotal feedback from sub-panel members that suggested they found the impact template challenging to assess in REF 2014 and therefore see this proposal as a means of reducing burden on the sub-panels.

As per our answer to Question 41, we are concerned that including this element in the environment template without increasing the weighting for environment risks devaluing this part of the submission.

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?

The required number of case studies is highly dependent upon the wider consultation question of whether all research-active staff should be returned and what the definition of research-active means. Our answer therefore assumes that all research-active staff will be returned, as per the proposal.

It is not clear as to how a number of c. 7,000 case studies has been determined an appropriate number for submission to REF 2021, other than because that is how many were submitted to REF 2014. Considering the substantial cost associated with developing impact case studies for submission to REF 2014 (estimated to be £55m, 25.5% of the costs to universities in preparing their REF submission), perhaps it would be sensible for fewer case studies to be submitted to REF 2021.

The proposed changes to the ratio of case studies to staff FTE will result in substantial changes to the number of case studies required per institution, even if the total number of case studies submitted remains relatively static. Modelling indicates less research intensive institutions will have to submit a substantially larger volume of case studies to REF 2021, whereas more research-intensive institutions will need to submit fewer. We suggest a method is devised that sees individual institutions submitting a similar volume of impact case studies (or indeed fewer) to REF 2021 as to REF 2014. We question whether this has to use staff FTE as the multiplier that determines the number of impact case studies. Other suggestions include using the QR allocated to units as the multiplier, or research income recognised by a unit. Of course, in the case of the former, a method would need to be devised for new units not in receipt of QR funds from the previous REF. We also question whether each unit has to submit an absolute number of case studies or whether a range could be identified with units choosing how many case studies to submit within this range.

We have some reservations about reducing the required number of case studies for the smallest units from a minimum of two to one, believing there is a risk that this will encourage smaller units to invest in only one area of impact, rather than taking a broader approach. Although this could reduce the burden on submitting institutions, it also risks preventing a culture of research impact across the sector. As such we suggest the minimum number of case studies remains at two.

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

Yes

No

Comments:

We are broadly in support of this proposal and think the additional fields will help clarify what information is required for case study submissions, as well as facilitating the analysis of case studies. We are concerned that the collation of this information may add a considerable administrative burden to institutions.

Associated research may be very difficult to demonstrate as research which contributes to impact may

not always be associated with a particular set of research grants. This data will therefore, certainly in some cases, be dependent on the accounts of academic staff provided to a central REF team.

We are also concerned that staff may be excluded from submitting excellent impact case studies because of their contractual status at the time of publication (for example, completing PhD students on fixed-term teaching contracts).

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

As per our answer to Question 27 and depending on the number of further fields, we are concerned that the collation of this information may add a considerable administrative burden to institutions, arguably simply moving it from the REF team at the end of the exercise.

In theory we are not adverse to the possible inclusion of further fields, however, it is difficult to provide an insightful response without further details as to the possible fields, so at this stage we do not agree with their inclusion or making the information available to the panels.

We are concerned that the move to additional fields introduces a somewhat unwelcome measure of prescriptive assessment that would influence the assessment process itself, therefore detracting from the role of peer review in evaluating the impact case studies. We stress the importance of considering how the inclusion of additional fields may create bias in assessment (for example, the risk of research funded by Research Councils UK being perceived as resulting in higher rated case studies and/or having the capacity to increase research impact).

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

We strongly support this proposal, believing it will encourage greater collaborative working, alleviate pressure on individual academics, and provide opportunities to capture a more accurate picture of the overall sources of impact. This proposal harmonizes well with the idea of impact as a group achievement and provides greater opportunities for showcasing impact arising from interdisciplinary research. We suggest the guidance includes a clear definition, illustrated with examples, of what constitutes 'bodies of work'.

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

- Yes
 No

Comments:

We agree that the proposed timeframe for the underpinning research activity is appropriate, recognises the time lag between publication and impact, and is appropriate for all UOAs. We believe the proposed start date is supportive to institutions that do not have such a long history of undertaking research.

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 are supportive of the continuation of the threshold of 2* for the underpinning research where this is published in conventional formats. For all other cases, we suggest that the impact case study template includes a section allowing narrative justification of the rigour of the underpinning research, such as a summary of the research design, data collection, interpretation and communication. Without a clear definition of what constitutes a 'body of research', it is difficult to suggest how else rigour could be assessed.

32. Evaluation of REF 2014 found that provision of impact evidence was challenging for HEIs and panels. Do you have any comments on the following:

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

We support the proposal for institutions to provide audit evidence to the panels that demonstrates that the particular events / initiatives took place as described in the case study (as opposed to evidence that demonstrates the effectiveness of such events / initiatives), although we note this may be more useful and relevant in some UOAs than others. We view this proposal as having the potential to result in a substantial amount of work and we are fearful of the increase in administrative burden this would bring to institutions. The majority of this additional work would be associated with the preparation of the evidence to ensure it would be presentable to the panels. The additional work may be greater in some UOAs and/or impact types than others. In particular, this might be more onerous for creative and practice-led impacts reliant on mechanisms such as blogs, videos, etc. A way of reducing the burden associated with providing audit evidence would be to require institutions to collate this information but only provide it to the panels on request. We suggest the REF 2021 guidance includes clear definitions and examples of what constitutes audit evidence across a wide range of impacts, disciplines and sources.

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

We do not agree with the sole use of metrics to assess impact due to the scale, depth and diversity of research impacts and we are concerned that their use to assess, or even inform the assessment of, impact could create an unnecessary and inequitable hierarchy with difficult-to-quantify impacts being regarded as having less reach and significance, regardless of what has been achieved. In particular we are concerned about the introduction of any metrics which would be reliant on economic proxies such as Social Return on Investment. Instead of relying on metrics to evidence impact, the research community needs to be empowered to think more creatively about the types of data which could enhance impact narratives.

However, we do agree that there is a place for better guidance on the use of data as evidence for impact and would like to see more robust and clear examples of metrics that could be used, particularly as there was sector-wide uncertainty as to what could constitute appropriate qualitative measures for REF 2014. Using examples of excellence from the 2014 exercise, a clearer framework could be included as to what constitutes robust (qualitative and quantitative) impact data (as per the KCL report *The Nature, Scale and Beneficiaries of Research Impact (2015)*). These should not be prescriptive or mandatory, but should support academics with contextualising and expressing the value of their work in generally agreed terms. We suggest this is undertaken by the panels so discipline-specific impact metrics guidance can be produced. One of the great strengths of the REF 2014 impact case studies is their discursive nature and we object to the possibility of the complexity of the case studies becoming reduced to metrics alone.

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

We stress that the approach to impact should not be focused around metrics as this will inherently advantage some research areas and types of impact over others. Instead, the onus should be on the researchers to demonstrate impact in a way which is meaningful to peers both within the research community and to research users.

We also note the difficulties in evidencing the significance of impact in some types of case study, for example, impacts on those in care (for example, those in prisons, schools, care homes, etc.). In such cases it may be difficult to collect direct feedback from those experiencing the impact. It would be helpful for the REF 2021 impact guidance to acknowledge that testimonials provided by individuals on behalf of those in their care will be regarded as equally eligible and valued in place of direct feedback from end users.

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 with the proposal that impacts returned to REF 2014 should be eligible for submission to future REF exercises, providing they still meet the eligibility criteria and that substantial new impacts have been realised in the subsequent REF assessment period. The assessment should only take into account the new

impacts realised in the assessment period so as to avoid institutions being rewarded twice for the same impacts. If they were not eligible for resubmission to future exercises then we believe this would signal an unwelcome message to the sector that long-term impact is not valued and could discourage academics from continuing to foster important areas of impact.

Where an impact is resubmitted, we suggest that the case study should be updated to demonstrate and evidence the new impact, as well as providing any additional information required as a result of changes to the impact case study template, such as additional fields, sections, etc. We think there should be a mandatory field on the impact case study template to confirm whether the case study has been submitted previously and that this should be shared with panels, but we strongly believe that the panels should not be provided with information as to how the case study was scored previously. We do not agree with the proposal for a cap on the number/proportion of previously submitted impact case studies that an institution can submit. There should be no advantage or indeed disadvantage to institutions resubmitting an impact case study.

9. Environment

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

Yes

No

Comments:

We agree that the environment template could benefit from the inclusion of additional metrics, providing these are supplemental to, rather than a replacement of, the narrative. Research environments are rich, diverse, multifaceted and complex; they cannot be assessed solely or predominantly by metrics. The narrative needs to remain at the heart of the assessment of environment with quantifiable data provided as evidence where appropriate. We agree with the proposal to use quantitative data already captured by institutions as a way of reducing the administrative burden on institutions. Metrics used to inform the assessment of research environment are likely to differ according to discipline. As such we suggest that decisions regarding metrics are left to sub-panels to agree with input from disciplinary communities, an approach we have also suggested is used for determining output metrics in our response to Question 18.

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

We suggest that some of the equality and diversity information about staffing profiles is provided; this is already captured by universities for the purposes of the HESA Staff Collection. This could include data on gender, BME, disability, age, etc. It would be useful for units to provide data on the proportion of early career, mid-career and senior academics, although this data is not routinely collected and definitions are likely to be tricky.

We would also like to see data on investment in research, for example, investment in research facilities, equipment, training and development, research support posts, resources and databases, etc. In such

cases we believe data should be presented proportionally to the institution's size, for example, investment in research facilities reported as either a proportion of research income or a ratio to QR funding.

Metrics on international collaboration would also be informative, for example, the proportion of outputs co-authored with one or more international peers. International collaboration maps would be interesting to include.

We suggested in our responses to Questions 15, 20 and 35 that some data currently captured as part of the HE-BCI survey could be returned in the environment section of the REF. This would include data on IP and commercialisation, collaborative research with organisations outside of academia, contract research, etc.

Not strictly quantitative, but we suggest including an explicit section in the environment template for units to include information on how research excellence is linked to their teaching curriculum, and how this in turn is of benefit to students. To do so would incentivise institutions to make greater linkages between research and education, thus enhancing the excellence of UK teaching quality and ensuring UK industry benefits from graduates whose knowledge base is current and world-leading.

We also believe that there is a distinct lack of accountability in how universities complete the environment section and suggest that the revised environment template requires universities to report back on what they said they would achieve in their previously submitted statement.

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

Please see our response to Question 15 for our suggestions on how the environment element could give more recognition to universities' collaboration beyond HE. We consider professional practice to be an essential part of the research environment and are therefore keen to see knowledge exchange and other forms of social/cultural engagement more prominently featured in the REF.

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

Yes

No

Comments:

The REF policy on OA is a positive move towards open science and we are already seeing this policy changing behaviours at Bournemouth University and across the sector. However, we do not agree with the proposal that the REF should award additional credit to units that can demonstrate their approach is above policy requirements. This will privilege large research-intensive universities that already receive additional support for OA, such as via the OA block grant, in addition to large volumes of QR funding and can therefore more easily and rapidly invest in systems and resources to ensure their approach to OA is above policy requirements. These larger universities are able to invest in this OA development alongside continuing to pay publishers for subscriptions. Many smaller and/or newer universities simply do not

have the resources to keep up with this. In addition, being able to invest in OA development alongside continuing to pay for journal subscriptions will also favour large research-intensive universities in the TEF as one of the TEF metrics is investment in library collections. As such we believe the allocation of additional credit in the REF will contribute to the further division and stratification of the HE sector.

One further point we would like to raise is that the REF OA policy is somewhat ambiguous as to whether chapters in edited collections are to be considered as journal articles or monographs or neither. These outputs are popular in UOA 20 (Law) and we therefore suggest that clarity is provided soon as to how these are to be treated under the REF OA policy.

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

We support the idea of the REF being used as a vehicle to encourage the open data agenda; however, we are anxious about doing so at the stage due to the embryonic stage of open data, even in the STEMM disciplines where it is more established. We believe the encouragement of better research data management is wider than the REF – universities need more support to address the extra burden and associated costs of good data management. Many universities do not have the resources to implement research data management policies and procedures at the required level and are therefore attempting to absorb the additional work as business as usual.

However, we have identified two possible roles for the REF in the promotion of good research data management: i) providing guidance in regard to the IP of data, including the clear and standardised attribution of data; and, ii) ensuring there are sub-panel members with experience of open data, who can champion research data management and who have the knowledge and expertise to adequately assess research datasets submitted as outputs to REF 2021.

10. Institutional level assessment

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

There could be advantages in reporting on some dimensions of research environment at institutional level, particularly in terms of incentivising greater interdisciplinary working and reducing duplication between UOA-level environment statements. We support the proposal for each institution to submit an institution-level environment statement providing this complements the UOA-level narratives. We are concerned as to how a panel (presumably separate to the UOA panels) would assess and compare very different institutions (in terms of size, history, culture, ethos, academic breadth, etc.). Of particular concern is the assessment of small and/or specialist institutions, especially where an institution might only submit to one UOA. There is a risk that, in some institutions, a high scoring institutional environment statement could prop up and reward mediocrity in some of that institution's lesser-performing units. This would be at the expense of identifying and rewarding excellence of some high-performing units in average ranking institutions. This does not meet the REF aim of rewarding excellence wherever it is

found. Our preference is for each institution to submit one institution-level environment statement and for this to be provided to the sub-panels for context, alongside the UOA-level environment narratives, but not scored separately.

We are not in favour of institution-level assessment for impact as it is currently articulated. The proposals are vague and it is not clear as to what problem they are trying to solve. We are confused as to whether an impact case study could be submitted at both UOA- and institution-level; if not then there is a risk that strong case studies could be submitted at institution-level to the detriment of some of the UOAs. We are not comfortable with how this potentially puts the units in conflict with the central university. It is not clear whether the proposal is that institution-level case studies would have to be interdisciplinary within or outside of the institution (or perhaps both?) or what the definition of interdisciplinarity is in this context. The KCL analysis of the REF 2014 impact case studies identified that the majority, and particularly those that scored highly, were interdisciplinary. As such, we question the driver for proposing to identify and reward interdisciplinarity research at institutional level? One possible answer is the possibility that universities had some impact case studies they couldn't submit to REF 2014 as they didn't fit neatly into UOAs; however, this wasn't the case at Bournemouth University and we would not find the introduction of institution-level impact case studies helpful. The introduction of institutional case studies needs careful thought as it will definitely increase burden in institutions.

If the institution-level assessment of impact is essential then we believe it would be far better for this to focus on institutional support and strategy for enabling and investing in impact, rather than the assessment of specific case studies. This could be an improved version of the impact statement template that formed part of REF 2014 but at institution-level and could therefore be an explicit section of an institution-level environment statement.

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

Suggestions include:

- How institution-level assessment would assess institutions of different sizes, breadths, cultures, etc.
- How institution-level assessment with work alongside and mutually complement UOA-level assessment.
- How quantitative data could be used to inform peer review of environment and impact, particularly in terms of evaluating effective mechanisms for strategic, cross-institutional working.

11. Outcomes and weighting

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

For the reasons stated in our answer to Question 38, we do not support an institution-environment score being calculated outside of the sub-panels and are therefore not in agreement with such a score contributing to the overall quality profile for each submission. We are also unconvinced by an institution-level impact score and do not agree with this contributing to the UOA quality profiles either. If institution-level assessment is to go ahead then our preference is for these to not form part of the UOA quality profiles but for these to be considered separately.

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

No

Comments:

We agree that impact should not be weighted more than 20% overall. As per our answer to Question 25, if the impact statement moves to the environment element then we think the weighting for environment should increase and be equal with the weighting for impact. We do not advocate a decrease in the weighting for outputs (therefore remaining at 65%) and suggest instead that impact and environment are both weighted 17.5%. This would maintain the overall weighting for impact (acknowledging that some of the environment weighting would now relate to impact) whilst also not devaluing the research environment. We believe this is important as the environment is a critical dimension of overall research quality, supporting and enabling high quality outputs and impact, and has wider implications for the quality of life and wellbeing of the academic staff.

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

Yes

No

Comments:

See our responses to Questions 38, 40 and 41. We do not agree with institution-level assessment contributing to the UOA-level quality profiles. If, however, institution-level assessment goes ahead and the scores form part of the UOA-level quality profile then we think the proposed environment weighting is too high and would like to see this lowered to 5%. Institution-level impact should also be no more than 5%.

We wholeheartedly believe the overriding focus of the REF should be the quality of the submitted research and the immediate (submission level) environment it was produced in. In this respect any inclusion of institution-level impact and environment has strong potential to distort the wider picture nationally, where high scoring institutions stand to artificially raise the score of under-performing submissions, whilst the quality of overall assessments in low scoring institutions will be artificially depressed. The latter is a particularly distorting influence as there is an argument to be made that high quality submissions originating from low scoring institutions should be commended rather than penalised for achieving good standards of quality in spite of institutional limitations, rather than because of institutional advantages. Whilst it is entirely reasonable to collate and publish data on quality at an institutional level, such assessments should not then form part of the evaluation of individual submissions.

12. Proposed timetable for REF 2021

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

Our overriding impression is that this is an extremely broad consultation covering a substantial volume of complex interrelations and uncertainties that cannot be dealt with sufficiently in this consultation period. We feel this will put the funding bodies in the difficult situation of having limited time to assimilate a huge amount of feedback and make critical decisions by summer 2017, and will put institutions in the difficult position of having to adjust to significant changes in assessment criteria two thirds of the way through the assessment period. We feel the complexity of some of the interrelations between proposals may require a second consultation before any decisions on the next REF can be made, and note this would then put unnecessary pressure on institutions to make submissions by the proposed autumn 2020 deadline. Perhaps a better solution would be to run the next REF as per the 2014 rules, whilst simultaneously consulting thoroughly with the sector and then implementing any changes for the post-post-2014 REF.

We agree with the Stern Review's recommendation that the REF should take place every 5-7 years to enable sufficient levels of both stability and dynamism in the research environment. If REF 2021 goes ahead with some/all of the proposed changes then we urge the funding bodies to produce guidance as soon as possible. Given the scale of changes proposed and the changes that would be required in institutions if some/all the proposals were to go ahead, we would like to see the timetable determined by the publication of the guidance and panel criteria. Ideally the submission date would be at least two to three years after the publication of these documents.

13. Other

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

We have significant reservations with some of the proposals in the consultation document, particularly

around what appears to be the shifting purpose and focus of the REF. REF seems to be being repurposed from an exercise interested in identifying research excellence wherever it is found to an assessment of all research undertaken in universities. This is compounded by the refocusing of REF from the level of the individual to the institution which risks rewarding mediocrity in large institutions at the expense of excellence elsewhere. We therefore believe that the implementation of the proposals as set out in the consultation would undermine the principle of identifying and rewarding islands of research excellence.

We would like to see the REF more explicitly recognise and reward international collaboration, engagement and impact in all parts of the assessment as this is becoming an increasingly important part of the research landscape. We believe the review of the REF provides a good opportunity to ensure it aligns with other reporting mechanisms, such as the TEF and the HE-BCI Survey. Aligning the REF and with TEF would strengthen the important link between research and education and provide a future mechanism for evaluating and demonstrating the impact of research-led teaching. For starters we suggest changes to the REF such as the submission of all academic staff (regardless of academic employment function), using the REF UOAs as the subject-levels in the TEF, and including an explicit section in the environment template for units to explain how they link teaching with research. It is essential for the link between research excellence and teaching to be supported through the REF in order to ensure that students benefits from the investment made by government and universities in research.

Whilst the REF may be refined to incentivise collaboration between units within a university and between universities and/or other external bodies, the current structure actively discourages collaboration between individuals/teams in the same unit in the same institution (even where projects involve external partners), due to two or more co-authors in a unit in the same institution being unable (or strongly discouraged) to submit the same output. We would like to see this reviewed as it is in conflict with the rule that an output can be submitted by multiple co-authors without question, providing the co-authors are based in different units in the same institution or in different institutions.

14. Contact details

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

Julie Northam - jnortham@bournemouth.ac.uk