



REF 2021 Draft guidance on submissions

A submission from the British Academy
September 2018

For further information, contact:
Adam Wright
a.wright@britac.ac.uk
+44 (0)207 969 5214

Summary

Research England is consulting on its draft framework and generic criteria for assessment in the 2021 Research Excellence Framework (REF). The consultation document sets out the draft guidance to higher education institutions and specifies the content, data requirements and definitions for submissions to REF 2021.

Changes to the assessment framework and criteria have been informed by recommendations from Lord Stern's review of the Research Excellence Framework in 2016 and evidence submitted to the subsequent HEFCE consultation on the second Research Excellence Framework in 2017.

Many of the positions in this submission are derived from previous evidence submitted by the British Academy to both the Stern Review¹ and the HEFCE consultation.²

The Academy is also responding to a parallel consultation on the draft guidance to panels in REF 2021.

Introduction

The British Academy is the UK's national academy for the humanities and social sciences (HSS). As a Fellowship of over 1000 of the country's leading academics, the Academy exists to promote and champion its disciplines. The humanities and social sciences provide a critical lens through which society can address the wide-ranging challenges we face today.

Given that the British Academy is not a higher education institution, we are responding to this consultation in our role as a funder of research and researchers in the humanities and social sciences, and on behalf of the HSS community and our Fellowship, the majority of whom will be directly involved with and impacted by the next Research Excellence Framework.

Part 1 - Overview and Key Changes to REF

Consultation question 1

a. The guidance is clear in 'Part 1: Overview of the assessment framework':

o Strongly agree

o Agree

o Neither agree nor disagree

o Disagree

o Strongly disagree

b. Please provide any comments on Part 1.

¹<https://www.britac.ac.uk/sites/default/files/British%20Academy%20Full%20%20Response%20Lord%20Stern%27s%20Review%20of%20REF%200.pdf>

²<https://www.britac.ac.uk/sites/default/files/British%20Academy%20response%20to%20the%20second%20REF%20consultation.pdf>

Part 2 – Submissions

Consultation question 2

a. The guidance in 'Part 2: Submissions' is clear:

o Strongly agree

o Agree

o Neither agree nor disagree

o Disagree

o Strongly disagree

b. Please provide any comments on Part 2.

Submission of research-active staff

The Academy has supported the proposal to submit all research-active staff in an institution to the REF. In its response to the call for evidence to the Stern Review, the Academy recommended that “all staff employed in a submitting institution with research in their contract of employment should be submitted to the REF.” This position was reiterated in the Academy’s response to the HEFCE consultation on the second Research Excellence Framework in March 2017.

Submission of interdisciplinary research

The Academy supports the enhanced procedures for assessing interdisciplinary research, including the appointment of an interdisciplinary research advisory panel. We hope that the measures will help dispel any perception that interdisciplinary research is less well received in the REF process, as our *Crossing Paths* research found that some institutions had been put off submitting interdisciplinary research to REF 2014 due to such negative perceptions.³

We also hope that the development of a clear definition of interdisciplinary research and greater clarity in the assessment process will encourage institutions to apply greater consistency in the flagging of interdisciplinary submissions. Evidence gathered through the *Crossing Paths* project suggested that in REF 2014, institutions flagged outputs as interdisciplinary erratically, in such a way that demonstrated a lack of confidence in the process.

Open access

The Academy supports the principle of extending the access of both specialists and the general public to the fruits of academic research. The minimum requirements for open access for REF 2021 appear reasonable and manageable. However, our main concerns are with the development of open access policy beyond REF 2021, particularly for dealing with monographs.

The Academy set out its concerns in its position paper, *Open access and monographs: Where are we now?*⁴ In particular, the Academy wants to ensure that the development of an open access policy for research assessment does not alter research practices, which academics

³ https://www.britac.ac.uk/sites/default/files/Crossing%20Paths%20-%20Full%20Report_2.pdf

⁴ <https://www.britac.ac.uk/publications/open-access-monographs-where-are-we-now>

should be free to determine for themselves. The general principle of equity in the REF states that it 'aims to assess all types of research without distorting the activity that it measures' (p.9). With monographs, however, without careful thought and constructive dialogue, open access requirements could lead to a break with this longstanding agreement that assessment processes should not in any way seek to determine research practice.

The Academy seeks assurances that in REF 2021 and beyond, this agreement is upheld. In order to ensure this is the case in relation to open access, a full and transparent consultation is required to discuss with the relevant stakeholders ways in which open access monograph publication can be achieved without harming the freedom of academics to choose how, where and when they produce their research. We hope that the sector can learn from an evaluation of open access submission in REF 2021 and the Academy is keen to work closely with Research England to ensure that future assessment exercises can successfully accommodate open access in a positive way. This dialogue should begin immediately to develop workable policies which respond to the changing publishing landscape in time for future assessment exercises. The Academy very much supports the work of the Universities UK Open Access Monographs group in this area.

Part 3 – Data requirements and definitions

Consultation question 3

a. The guidance in 'Part 3, Section 1: Staff details' is clear:

o Strongly agree

o Agree

o Neither agree nor disagree

o Disagree

o Strongly disagree

b. Please provide any comments on Part 3, Section 1.

Research independence

Consultation question 4

Possible indicators of research independence are set out at paragraph 130, including a reference to a list of independent fellowships. This list is intended to guide institutions on determining independence for staff holding fellowships from major research funders. The list is not intended to be comprehensive. Do you have any comments on the clarity, usefulness, or coverage of this list?

In its response to HEFCE's consultation on the second Research Excellence Framework, the Academy noted that there needed to be a clear and robust definition of independence to ensure some staff employed as research assistants, particularly in the social sciences, were not adversely affected.

The Academy agrees with the expanded definition of research independence and finds the examples of indicators adequate in identifying independent researchers. We believe that this definition and criteria should be suitable for allowing institutions to determine research

independence in different disciplines. The additional guidance on research assistants is also helpful in this case.

Seconded staff

Consultation question 5

Do you agree with the proposed eligibility of seconded staff set out at paragraphs 121.c to d? Please provide any comments on this proposal.

The Academy agrees with the proposal and has no further comments.

Ineligibility outside UK

Consultation question 6

"In REF 2014, academic staff who were employed by the submitting HEI and based in a discrete department or unit outside the UK were eligible only if the HEI demonstrated that the primary focus of their research activity on the census date was clearly and directly connected to the submitting unit based in the UK. Only a small number of such staff were returned in the previous exercise. These staff are not included in the annual HESA return. In the context of all-staff submission, the funding bodies are concerned about the potential complexity and burden for institutions in consistently identifying those staff based in a discrete department or unit outside the UK (employed by the submitting HEI) whose primary focus of their research activity on the census date is clearly and directly connected to the submitting unit, and ensuring all such staff with significant responsibility for research are returned."

a. Do you agree with the proposed ineligibility of staff based in a discrete department or unit outside the UK?

The Academy agrees with this proposal.

b. Please provide any comments on this proposal.

The Academy has consistently argued for, wherever possible in REF submission, a reduction of complexity and unnecessary burden for institutions and individual staff. We see this proposal as helpful in this respect and the benefits of this reduction in complexity are likely to outweigh any individual concerns.

Circumstances

Consultation question 7

In the 'Decisions on staff and outputs' (REF 2017/04) published in November 2017, the funding bodies set out their intention to develop arrangements to take account of staff circumstances in REF 2021. This decision reflected clear feedback in the 2016 REF consultation that some form of measures to take account of circumstances would be required. The decisions set out that there would be:

- measures to allow staff to be returned without the required minimum of one output where certain exceptional individual circumstances have affected their ability to meet the requirement*
- measures to allow an optional reduction in the number of outputs required from the submitting unit overall (intended to recognise the cumulative effect on the output pool where units have higher proportions of staff who have not been able to research productively throughout the period because of*

individual circumstances, even though they may meet the requirement for the minimum of one output).

During the detailed development of these measures, the funding bodies noted concerns that an approach based upon where there are significant effects of staff circumstances on the unit's overall available output pool, rather than on individuals' contributions to this, may not be sufficient to ensure equality and diversity is fully promoted through the REF exercise. This included concerns that such an approach would not appropriately recognise the effect of individual circumstances on productivity, and the potential for negative incentives (for example, around recruitment) to result from this.

The funding bodies would like to ensure that full confidence is maintained in the approach taken in the assessment process to promoting equality and diversity. We consider that this may best be achieved through measures that will allow defined reductions to be applied for differing types of individual circumstances. This will both recognise the overall effect of circumstances on a submitting unit's output pool, as well as formally recognise the effect circumstances may have on an individual's ability to contribute to the output pool at the same rate as other staff. We have developed draft proposals based on this approach for consultation, set out at paragraphs 149 to 193.

However, the funding bodies recognise that there are some drawbacks to these proposals, including:

- The level of burden for submitting institutions. The circumstances arrangements in REF 2014 were identified as a key burdensome aspect of the process; however, feedback generally identified that the burden was worthwhile in view of the support for equality and diversity that the arrangements provided.*
- Sensitivity around the disclosure process. The proposals set out below would require requests to be submitted in advance and with only the necessary information provided to justify the proposed reduction. This is likely to reduce the level of sensitive information submitted; however, it would still require HEIs to collect and hold verifying information.*
- The potential for increased under-representation through the concentration of the submitted output pool. In the 2016 REF consultation, clear concern was raised about the potential for staff with circumstances to be underrepresented in the submitted output pool. Given that the output submission requirements in REF 2021 already require a smaller number of outputs than in 2014, the application of significant further reduction is likely to increase this risk.*
- Applying reductions in the context of decoupling. As there is no set requirement for an individual's contribution to the submitted pool (beyond the minima and maxima contributions), reductions resulting from individuals' circumstances would need to be applied to the unit's total output requirement. It would be important in this context to ensure that reductions are being passed on to affected staff in a consistent way across submitting institutions.*

Given the issues raised above, we are interested in views on the following:

a. The proposed approach for taking account of circumstances will achieve the aim of promoting equality and diversity in REF 2021:

o Strongly agree

o Agree

o Neither agree nor disagree

- o Disagree*
- o Strongly disagree*

Please provide any comments on your answer.

b. The potential advantages of the proposed approach outweigh the potential drawbacks identified:

- o Strongly agree*
- o Agree***
- o Neither agree nor disagree*
- o Disagree*
- o Strongly disagree*

c. Please provide any comments on your answer.

The Academy understands the difficulties in creating a system of research assessment that does not create undue pressure or creates incentives to discriminate against particular groups. There will undoubtedly be a trade-off between addressing under-representation in the REF and tackling unfair practices. Ultimately, the Academy believes that the latter is of greater importance and, in dealing with such practices, hopes that a supportive research culture develops that, along with the flexibility of the decoupling process, improves the balance of representation.

The Academy has previously stated its concern over the need to account for personal circumstances, as it can create intrusive and arduous investigations into the circumstances of individuals. The proposals in the guidance would reduce the sensitive information required, but institutions would still need to collect some sensitive information, and the process by which information is disclosed needs to be simple, confidential, and proportionate. How institutions intend to collect and store this information should be included as part of their code of practice.

The emphasis on the code of practice for the selection of outputs will also help ensure that institutions are working to avoid discrimination and unfair practice. It is important, in a regime of decoupled outputs, that negotiated reductions are benefitting those for whom they were granted.

On balance, the Academy believes that the any additional burden and potential downsides to these proposals are outweighed by the likelihood of such proposals having a positive long-term impact on the equality and diversity agenda.

Part 4 - Research Outputs

Consultation question 8

a. The guidance is clear in 'Part 3, Section 2: Research outputs':

- o Strongly agree*
- o Agree***
- o Neither agree nor disagree*

- o Disagree*
- o Strongly disagree*

b. Please provide any comments on Part 3, Section 2.

The Academy understands the potential benefits of decoupling, particularly in removing the need for intrusive investigations into the personal circumstances of individuals. Decoupling can be particularly helpful in relieving unnecessary pressures on early career researchers and may, in the future, lead to an increase in the quality of research, by allowing staff to have more time to work on fewer outputs of higher quality.

The Academy has previously recommended that decoupling should only take place if the minimum requirement is zero in order to remove the need to account for personal circumstances. We understand, however, that this may not prove practical and may create its own unintended consequences.

The Academy has also previously recommended that the range of outputs should not exceed a maximum of five or six. We therefore support the proposal to limit the maximum number of outputs attributable to an individual staff member to five.

Output types

Consultation question 9

A glossary of output types and collection formats is set out at Annex K, to provide increased clarity to institutions on categorising types of output for submission. Do you have any comments on the clarity and usefulness of this annex?

The list of output types in Annex K appears comprehensive and may well be useful in identifying to institutions the breadth of acceptable formats that can be submitted.

Ineligibility of outputs from redundant staff

Consultation question 10

Paragraph 206.b sets out the funding bodies' intention to make ineligible the outputs of former staff who have been made redundant (except where the staff member has taken voluntary redundancy). This proposal reflects the funding bodies' view that, in recognition of the HEI's intentions regarding the post, including such outputs would not be consistent with the principle of non-portability. It also responds to concerns about the potential negative incentives that may be created in including these outputs. Do you agree with this proposal? Please provide any further comments.

The Academy supports the proposal to disallow institutions from submitting outputs from staff that they have made redundant. Institutions should not be allowed to profit from the research of staff for which it has made a business case for redundancy. Allowing the submission of redundant staff may also create perverse incentives on institutions regarding staffing practice.

Co-authored outputs

Consultation question 11

As set out in paragraph 260, the funding bodies consider that the fullest and most favourable impression of research in the submitting unit will be presented where co-authored outputs are returned only once within the same submission (in one UOA by an institution), aside from the exception outlined in paragraph 261. This approach is aligned with the decoupling of staff and outputs in REF 2021; however, the funding bodies note concerns that have been raised about the extent to which this will sufficiently recognise collaborative research activity within institutions – particularly in the broader UOAs that will often receive submissions comprising multiple departments in an HEI. In view of these concerns, we are seeking views on this issue.

a. Do you agree with the proposed intention to permit the submission of co-authored outputs only once within the same submission?

The Academy has concerns with this proposal, which we set out in answer to 11(b).

b. Please provide any comments on this proposal.

Collaboration is a critical part of research, encouraging creativity and efficiency, and often producing wider and stronger impact, as noted in the Stern Review.

The Academy is concerned about the potential negative implications of this proposal. Allowing co-authored outputs to be submitted only once may discourage such collaboration because the policy could be perceived as devaluing submissions or this kind. This appears at odds with the support for interdisciplinary research elsewhere in the guidance, because interdisciplinary research is often the product of cross-departmental collaboration.

While the Academy acknowledges the opportunity to apply for co-authored submissions to be double-weighted, this process carries an additional administrative burden as well as a risk, both of which would have to be factored in to decisions about collaboration.

Whether the proposals represent a real or simply a perceived threat to collaboration does not change the performative effect that such a policy could have on the behaviours of institutions or individual academics. It will be important to ensure such collaboration is not devalued or disincentivised by the procedures of the REF in the same sense that the new guidance seeks to support interdisciplinary research.

Data collection

Consultation question 12

Proposals are set out at paragraphs 267 to 271 for capturing data on research activity cost for outputs submitted in UOA 4. The aim of these proposals is to recognise the differing balances of research activity costs in submissions made in UOA 4 through the provision of additional information to the funding bodies that is captured through the REF submission process. We are seeking views on these proposals during the consultation period on the following points:

a. How feasible do you consider to be the approach set out at paragraphs 267 to 271 for capturing information on the balance of research activity of different costs within submitting units?

The Academy has consulted with its Fellowship in Section S6: Psychology on the approach to capturing research activity costs in UoA 4. While there were pockets of support for the principle of collecting data on research costs for the purposes of funding allocation, the majority of those consulted were unconvinced by the arguments for costing research outputs in UoA 4 and they have concerns over the feasibility of the process.

The Academy believes that the position of the Experimental Psychology Society and other representatives from the discipline have made strong arguments against the proposal. There appears to be little confidence in the ability to collect reliable data on cost and to apply consistency in measuring and tracking the costs of capital expenditure on infrastructure and expenditure on the conduct of research within outputs.

b. Are the examples of high cost and other research activity sufficiently clear to guide classification?

The examples in Box 1 in the guidance are unreliable for differentiating between levels of research cost because costs will vary considerably depending on method, scale and depth of analysis.

c. Please provide feedback on any specific points in the guidance text as well as the overall clarity of the guidance.

Overall, the Academy is not confident that this approach is advisable or beneficial. The collection and use of such data could do more harm than good. We therefore do not support the proposal for capturing data on research activity cost.

Impact

Consultation question 13

a. The guidance is clear in 'Part 3, Section 3: Impact':

o Strongly agree

o Agree

o Neither agree nor disagree

o Disagree

o Strongly disagree

b. Please provide any comments on Part 3, Section 3.

The Academy welcomed HEFCE's previous recommendations for a broader and deeper definition of impact in the consultation on the second Research Excellence Framework. Impact as defined in REF 2014 was narrow and implied direct causation, failing to account for wider and more nuanced benefits that are seen in bodies of humanities and social science research.

The proposed definition of impact for REF 2021 is certainly an improvement. We welcome the inclusion of impact on teaching in higher education as part of this broader definition, as this is something we recommended in our response to the HEFCE consultation. We agree that the concepts of reach and significance are appropriate for the measurement of impact and approve of the more developed definitions of these in the guidance.

The Academy has provided additional comment on impact in its response to the parallel consultation on REF panel criteria.

Environment Data (Q14)

Consultation question 14

a. The guidance is clear in 'Part 3, Section 4: Environment data':

- Strongly agree*
- Agree*
- Neither agree nor disagree*
- Disagree*
- Strongly disagree*

b. Please provide any comments on Part 3, Section 4.

None.

Environment (Q15)

Consultation question 15

a. The guidance is clear in 'Part 3, Section 5: Environment':

- Strongly agree*
- Agree*
- Neither agree nor disagree*
- Disagree*
- Strongly disagree*

b. Please provide any comments on Part 3, Section 5.

The Academy supports the inclusion of an institution's approach to supporting and enabling impact to be captured as a specific element of the institutional-level environment statement. This should ensure that the follow-through from research to wider benefit is encouraged, supported and facilitated as part of the overall management of research.

The Academy has provided additional comment on environment in its response to the parallel consultation on REF panel criteria.