

# Consultation on the second Research Excellence Framework

## Page 1: Respondent details

Q1. Please indicate who you are responding on behalf of

Higher Education Institution

**Please provide the name of your organisation**

University of Salford

## Page 2: Overall approach

Q2. 1. Do you have any comments on the proposal to maintain an overall continuity of approach with REF 2014, as outlined in paragraphs 10 and 23?

We would prefer as much continuity as possible given that this is only the second REF cycle. There is also a concern that the nature of changes proposed move away from assessing research excellence towards an audit of research activity, with a detrimental impact on the perception of British universities.

## Page 3: Unit of assessment structure

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

In general we would argue for a continuation of the Units of Assessment from 2014. Any alterations should focus on consolidation and broadening of UoAs to allow for the inclusion of sub- and emerging disciplines.

## Page 4: Expert panels

Q4. 3a. Do you agree that the submissions guidance and panel criteria should be developed simultaneously?

Yes

**Comments:**

It would be useful to have finalised any panel related decisions on the use of indicators before the guidance gets 'advertised' across the institution. In terms of impact it is possible that the main panels will differ slightly on typologies, and more so on indicators (particularly ones they might expect). Again, it would be useful to have this information at the outset (rather than over 6 months later, as in REF 2014).

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

No

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

**Comments:**

It is important that sub-panel members are in place early to ensure they are properly inducted and have time to understand the criteria, especially around non-journal outputs and impact.

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

Yes

**Comments:**

We welcome any measure that improves the representativeness of the main panels and sub-panels.

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

The process should be transparent, therefore an open call would be appropriate, along with recommendations from HEIs and learned societies.

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

Yes

**Comments:**

It is essential that the process is inclusive and reflects good practice across the sector in terms of improving the equality and diversity of research communities.

Q9. 6. Please comment on any additions or amendments to the list of nominating bodies, provided alongside the consultation document.

We would add HEIs to the list, as they have a broader set of networks (both within institutions and industry).

## Page 5: Staff

Q10. 7. Do you have any comments on the proposal to use HESA cost centres to map research-active staff to UOAs and are there any alternative approaches that should be considered?

7.1 We agree with the broad principle of using HESA staff numbers to determine the overall population of staff to be returned and gaming should be minimised. However there are concerns about using HESA cost centres to drive UoA selection, and we propose an alternative mechanism to reflect the research base more accurately and to encourage interdisciplinarity.

Q10. 7. Do you have any comments on the proposal to use HESA cost centres to map research-active staff to UoAs and are there any alternative approaches that should be considered?

7.2 The challenge is that HESA codes are teaching- rather than research-based and therefore do not reflect the research ecosystem within institutions or across the sector as a whole. REF is not a measure of research-linked teaching and learning. One advantage of REF is that it allows institutions to maintain pockets of world-leading research in areas with fewer students. If HESA codes are used to drive the composition of UoAs, there is a danger that research may head towards generalisation driven by teaching. Extrapolating from this, there is a danger that investment is driven towards less excellent research to bring larger teaching areas up to scratch at the expense of giving less priority to smaller, but excellent, research areas.

7.3 A further concern is that using HESA codes to drive the composition of UoAs will not reflect or reward interdisciplinary research, and could actively discourage institutions from undertaking such research, to the detriment of the UK research base and UK/global economies. We note that the Stern Review placed a strong emphasis on the development of interdisciplinary research. Assigning staff to UoAs via HESA codes would be contradictory to this principle.

7.4 To address these issues, and allow HEFCE oversight of composition of UoAs, while reflecting the interdisciplinarity, diversity and excellence of the research base, we propose the following model:

- o HESA codes to determine the total number of staff FTEs (and therefore outputs) that institutions must return. The census date to be determined by HEFCE.
- o In summer 2019, institutions must submit a document to HEFCE outlining which staff will be returned to which UoAs, providing written justification for the composition of each UoA (see model proposed in answer 8.7 below).
- o HEFCE can review the outline submissions to ensure that there is a reasonable rationale for UoA composition, and that UoAs have not been gamed to maximise some at the expense of others. HEFCE will sign off the proposed return in advance of submission.

7.5 The advantages of this are:

- o It allows the sector to demonstrate its overall research excellence and specific concentrations of research excellence within that.
- o It supports and evidences interdisciplinary research.
- o It prevents the distortion of institutions' research strategies, which allow prioritisation of themes of activity across discipline areas. Mapping UoA to HESA codes would be counterproductive to these strategies.
- o It will deter the including or excluding of research active staff from particular UoAs simply for the purpose of gaming the UoA.
- o UoA composition will be driven by the research environment and priorities.
- o HEFCE will receive advance notice of the submission, which will help inform panel selection.

Q11. 8. What comments do you have on the proposed definition of 'research-active' staff described in paragraph 43?

8.1 In principle we support the proposal though we note the following challenges:

8.2 Widespread use of standard academic contracts mean staff have been identified as teaching and research in HESA, even if they have little or no research workload or outputs.

8.3 By extension these staff will not be able to demonstrate a 'clear connection to the submitted unit' (paragraph 62) which is the requirement for eligibility for staff on fractional contracts, and as such could be considered ineligible for submission.

8.4 Inclusion of such staff could increase the burden on panels who would be reviewing lower quality work, which could artificially skew the representation of the research base.

8.5 This creates a risk of a new form of gaming through the movement of non-research active staff to teaching only contracts. This could be detrimental to equality and diversity, especially in subject areas with a preponderance of professionals that have moved into academia, such as allied health.

Q11. 8. What comments do you have on the proposed definition of 'research-active' staff described in paragraph 43?

8.6 These areas often contain staff working towards a PhD or post-docs that have yet to become independent researchers. Should such staff be included in the submission?

8.7 As an interim measure for REF 2021 we suggest that:

- o A minimum research time allocation of 20% is used to define a 'significant responsibility for research' as outlined in the Stern Review.
- o HESA rules are amended to allow institutions to classify staff with a research workload allocation below 20% as 'Teaching only'. To increase rigour, this could be based on institutional workload records from 2014/15 and 2015/16.
- o Each institution prepares a document which outlines the changes made, the justification, evidence, and equality and diversity statement explaining how the process was undertaken.
- o This document would be submitted to HEFCE in 2019 for approval, and would form the basis for the institutional submission.

8.8 The advantages of this proposal are that:

- o All research active staff will be assessed automatically
- o Ensuring research active staff have appropriate time allocated to research
- o Allows HEFCE to keep with its primary objective for REF 2021, which is to identify excellent research of all kinds in the UK sector, and to ensure that panels are reviewing only work of the highest quality (paragraph 40)
- o Minimises additional burden on panels
- o Enables game playing to be minimised through using data prior to the release of the Stern Review
- o Allows HEFCE to properly identify the research ecology of the sector
- o The data will have been audited independently, providing HEFCE with a robust dataset
- o Provides a more accurate picture of the breadth and depth of research excellence across the sector, without masking or diluting areas of excellence, or having a negative impact on the UK GPA and the international reputation of the UK research base
- o HEFCE will receive advance notice of the submission, which will help inform panel selection

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

9a.1 Given the need to avoid increasing the workload on panel members this is appropriate action. However, clarification on whether monographs and similar outputs could still be double-counted would be helpful.

9a.2 With regards to discussion about minimum and maximum outputs we believe this cannot be separated from issues of the definition of research active. If a more inclusive definition is adopted the sheer number of outputs will rise and the quality will almost certainly decline. The panels will be reviewing a smaller proportion of excellent examples of research. In this case, the minimum of 0 and a maximum of 6 would be appropriate, as they enable HEIs to minimise the impact of this outcome. By contrast, a much tighter definition of research active enables HEIs to only return staff that are truly active and producing outputs. In this scenario a minimum of 1 and a maximum of 4 would be appropriate.

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

As per 9a we would endorse a maximum of 6 outputs for REF 2021 and once changes to HESA codes are introduced, a move to a maximum of 4 would be appropriate.

**Q14. 9c. Setting a minimum requirement of one for each staff member?**

9c.1 The requirement for each staff member to return a minimum of 1 output will lead to technical issues for those staff on fractional contracts, and a mechanism for accounting for this would need to be developed. Using a minimum of 0 outputs would not require any adjustment for staff on fractional contracts.

9c.2 A minimum of 1 output may disadvantage those staff who have moved institution late in the REF cycle for genuine career reasons (rather than institutional 'gaming'), if non-portability of outputs is applied. Although research active, such staff may not have sufficient time to produce a research output prior to the REF submission date.

9c.3 The requirement for a minimum of 1 output would require the retention of a process to allow for special staff circumstances to be taken into account. This was highlighted as one of the inefficiencies associated with REF 2014.

9c.4 A minimum of 0 outputs allows a greater recognition of the collaborative nature of research, and of the contribution that all staff make to the research endeavour, even when not named on an output. It will also allow the return of those staff who are newly appointed, new to a research career, studying for PhDs, or who have returned after a career break to be returned, without the need for special circumstances dispensation.

For REF 2021 we therefore propose that either:

9c.5 Institutions can appropriately re-code those staff currently returned to HESA on 'Teaching and Research' codes (see proposal in answer 8.7), but who have no demonstrable responsibility for research alongside a range of 1-4 outputs per staff member.

**or**

9c.6 Institutions' staff numbers are determined by existing HESA data with no re-coding of staff, alongside a range of 0-6 outputs per staff member for REF 2021. There would be no need for a mechanism for fractional contracts or special circumstances. Advantages of this proposal to the sector and HEFCE are:

- o A reduction in the pressure for a large-scale change in staff contracts prior to REF 2021
- o Reduced impact of non-portability for earlier career researchers and new staff
- o Improved diversity of the REF submission
- o No requirement for a mechanism to account for fractional contracts or special circumstances

**Q15. 10a. Is acceptance for publication a suitable marker to identify outputs that an institution can submit and how would this apply across different output types?**

This is problematic for Practice as Research and other non-journal outputs and we are unable to identify a straightforward solution.

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

Given the challenges with Practice as Research outputs we would have particular problems with submissions to Main Panel D.

**Q17. 10c. Would non-portability have a negative impact on certain groups and how might this be mitigated?**

10c.1 Non-portability is likely to have the greatest impact on early career researchers, with potentially some impact on those staff who have had career breaks. Non-portability may restrict the normal movement of staff around institutions, which is critical to maintain a free flow of talent and knowledge

Q17. 10c. Would non-portability have a negative impact on certain groups and how might this be mitigated?

exchange across the sector.

10c.2 If the minimum number of outputs per individual returned member of staff is set at 1, this may disadvantage staff who move institutions closer to the end of the REF cycle for career or job reasons (rather than REF transfer). Such staff would be required to return at least 1 output from their new institution, but may not have had the time for an output to be produced and accepted. This is particularly the case for non-journal outputs and monographs.

10c.3 In mitigation, we propose that restrictions on portability are applied only to those staff who have been in a 'Research Only' or a 'Teaching and Research' role, with significant responsibility for research (see answer 8.7) for at least one REF cycle. Those staff who have started their research career within the REF 2021 REF cycle would be allowed full portability of their research outputs.

Q18. 10d. What comments do you have on sharing outputs proportionally across institutions?

10d.1 We agree with the broad principle introducing non-portability of outputs to limit the negative impacts of the REF 'transfer market', in particular where institutions can circumnavigate long-term investment to gain advantage in the REF through non-portability of outputs.

10d.2 Earlier career research staff may change institutions more than once in the early stages of their career, thus complicating the process of assigning outputs to one institution or another.

10d.3 The mechanism for portability and/or sharing outputs will depend on the census date(s) chosen for eligibility for staff submission and calculation of the number of outputs required (HESA FTE x2). Multiple census dates may cause issues.

10d.4 If staff start at a HEI 18 months or more before the final REF 2021 census date, they may be fully submitted by their new institution.

10d.5 In addition to our proposal in answer 10c.3, we propose that if staff move between institutions less than 18 months before the final REF 2021 census date (or after the proposed and audited staff return described in answer 7.4 and 8.7), they will only be allowed to return one output from their new institution. It is suggested that:

- o The individual can select what they believe to be their best output to submit from their new institution
- o The new institution advises the previous institution which output has been selected for submission
- o The previous institution may return any of the individual's remaining outputs, within the maximum and minimum requirements

Q19. 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

**Comments:**

Yes as this could be a means to track researchers in future REFs and consequently fully implement Stern's recommendations.

Q20. 12. What comments do you have on the proposal to remove Category C as a category of eligible staff?

This is not a significant issue at Salford so we do not have a view.

Q21. 13. What comments do you have on the definition of research assistants?

13.1 Our response to this question should be viewed in parallel with our response to question 8 (definition of 'research-active').

13.2 Paragraph 81 of the REF 2014 guidance (July 2011) states that: "Research assistants... are not eligible to be returned to the REF unless, exceptionally, they are named as principal investigator or equivalent on a research grant or significant piece of research work..."

13.3 If all staff coded as 'Research Only' or 'Teaching and Research' on the institution's HESA submission are required to be returned to REF, regardless of their actual research time allocation, this will result in a sizeable number of staff being returned to REF 2021 who do not meet the criteria for independence given in the REF 2014 guidance. Such staff may include:

- o Staff working towards a PhD (either registered or completing a PhD by Published Works) – such staff are teaching staff who are learning to be researchers
- o Staff on 'Teaching and Research' contracts who do not have a PhD and who do not have a time allocation for research
- o Staff who therefore do not have a clear connection with the submitted unit (paragraph 62 of the consultation document)

13.4 Institutions and HEFCE may face a challenge from Research Assistants excluded from the REF when substantive staff with equivalent or less responsibility for research are returned. We therefore propose that either:

13.5 Institutions return all staff currently coded as 'Teaching and Research' on HESA, including Research Assistants.

or

13.6 Staff without a significant responsibility for research (see answer 8.7) are recorded as 'Teaching Only' and not included in the REF submission. Research Assistants would then only be returned if they meet the criteria in the REF 2014 guidance.

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

The use of 0.2 contracts are useful for engaging professionals from industry and practitioners from arts and creative subjects. Anything that penalises this group of workers we would see as potentially harming university-industry relations.

## Page 6: Collaboration

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

15.1 We strongly support improvements to supporting and assessing collaboration between academic and organisations outside the sector.

15.2 We suggest that it may be challenging to identify, validate and introduce new indicators for assessing this activity at this stage in the REF cycle, so we suggest that for REF 2021, HEIF data around industry collaboration is included as a metric in the Environment template. This also provides an easy to

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

use metric which can be reported to government in support of this activity, and to evidence the effectiveness and vitality of UK Plc internationally.

15.3 We suggest a task group is set up to develop more detailed measures for REF 2026/7 as a longer-term solution, and the University of Salford would be keen to be involved in informing this

## Page 7: Outputs

Q24. 16. Do you agree with the proposal to allow the submission of a reserve output in cases where the publication of the preferred output will post-date the submission deadline?

Yes

Q25. 17. What are your comments in relation to the assessment of interdisciplinary research in REF 2021?

17.1 Salford is passionate about interdisciplinary research and while flagging may help easily identify this type of work we are unsure as to the value of appointing “interdisciplinary champions”. Without a clear rationale it appears a rather symbolic gesture.

17.2 There is already an identifier institutions can use for interdisciplinary outputs so it is unclear what the benefit of an additional field would be to the sector. Clarity would be required regarding HEFCE’s intended use of this field, e.g. to reward interdisciplinary research?

17.3 Our preference is for the proposal to include an explicit section in the environment template in which institutions can provide full information about their interdisciplinary structures.

Q26. 18. Do you agree with the proposal for using quantitative data to inform the assessment of outputs, where considered appropriate for the discipline? If you agree, have you any suggestions for data that could be provided to the panels at output and aggregate level?

No

**Comments:**

We support the findings of The Metric Tide with regards to quantifiable outputs.

## Page 8: Impact

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

Yes

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

**Comments:**

As stated earlier we are in favour in as much continuity as possible, though the average number of outputs per person submitted may need review to minimise the submission of weaker case studies.

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

We are unsure this is required beyond encouraging the panels to (a) stress that a wide array of impacts will be accepted (b) encourage cross-referral (c) allow panels to stress the requirement to use appropriate indicators where available, moving away from an over reliance on testimonial.

Q29. 21. Do you agree with the proposal for the funding bodies and Research Councils UK to align their definition of academic and wider impact?

Yes

Q30. 22. What comments do you have on the criteria of reach and significance?

We would support moves towards adding rigour, as it addresses the replicability issue in some disciplines.

Q31. 23. What do you think about having further guidance for public engagement impacts and what do you think would be helpful?

We would suggest that highlighting good practice, e.g. NCCPE, would be more beneficial than producing long lists in guidance notes. It should also be stressed that it's applicable across the entire REF.

Q32. 24. Do you agree with the proposal that impacts should remain eligible for submission by the institution or institutions in which the underpinning research has been conducted?

Yes

**Comments:**

Yes, need to benchmark from REF 2014.

Q33. 25. Do you agree that the approach to supporting and enabling impact should be captured as an explicit section of the environment element of the assessment?

Yes

Q33. 25. Do you agree that the approach to supporting and enabling impact should be captured as an explicit section of the environment element of the assessment?

**Comments:**

Yes, for reasons outlined in the Stern Review.

Q34. 26. What comments do you have on the suggested approaches to determining the required number of case studies? Are there alternative approaches that merit consideration?

26.1 As the proposal is to decouple outputs from the individual, we feel it would appropriate if the same approach was followed for case studies, i.e. rather than the number of case studies being a multiplication of staff submitted, it should be based on outputs. This will avoid any spike in the expected number of case studies.

26.2 A rule could also be introduced requiring a minimum percentage of case studies to be interdisciplinary.

Q35. 27. Do you agree with the proposal to include a number of mandatory fields in the impact case study template to support the assessment and audit process better (paragraph 96)?

Yes

**Comments:**

Yes, though this would need testing. Salford would be willing to participate in any pilot.

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

Given the stated importance of interdisciplinarity this would make an obvious optional field. It is also worth considering any explicit commercial value of the case study, which can then be utilised to demonstrate the economic value of research in the UK.

Q37. 29. What comments do you have in relation to the inclusion of examples of impact arising from research activity and bodies of work, as well as from specific research outputs?

Though we generally welcome this we are not sure a rule change is required.

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

Yes

**Comments:**

This allows sufficient time for patented activity to bear fruition.

Q39. 31. What are your views on the suggestion that the threshold criterion for underpinning research, research activity or a body of work should be based on standards of rigour? Do you have suggestions for how rigour could be assessed?

With the decoupling of outputs from individuals and the extension of the time frame for the production of the original work it is difficult to envisage how this can be achieved.

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

We would welcome this and perhaps the information could be hosted on HEIs' institutional research data management system as required by the EPSRC.

Q41. 32b. The development of guidelines for the use and standard of quantitative data as evidence for impact?

These should be encouraged where appropriate. However, the guidance should not be prescriptive and take into account disciplinary differences.

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

There is an argument to upload the bibliography (section 5) to a separate part of the REF architecture, linked to the pieces of evidence that can be audited. This may moderate the incidences of 'wordy' section 5 that were a feature of some REF 2014 submissions.

Q43. 33. What are your views on the issues and rules around submitting examples of impact in REF 2021 that were returned in REF 2014?

We would support their inclusion, though the guidance should state that cases need to be completely re-written, with wholly new corroboration. It should also be labelled as having been reviewed in REF 2014 and that submission should form part of any audit evidence.

## Page 9: Environment

Q44. 34a. Do you agree with the proposal to change the structure of the environment template by introducing more quantitative data into this aspect of the assessment?

Yes

**Comments:**

Yes, it would split up the narrative from the figures (which can get lost in the former) and allow more effective benchmarking by HEFCE.

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

34b.1 One of the welcome aspects of Stern was seeing the sector as part of a research ecology, in which individuals and institutions cooperated and reinforced quality outputs. A useful measure would be the number of collaborative bids across different HEIs.

34b.2 HEIs also nurture new academics, especially those from industry, and data on the number of staff undertaking PhDs would also be useful.

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

See earlier comments on HEIF (answer 15.2). There is also an argument to aggregate figures from the case studies within the institutional environment/impact statement (e.g. organisations engaged, funding secured from private sector, etc.).

Q47. 36. Do you agree with the proposals for providing additional credit to units for open access?

No

**Comments:**

Though we support the sentiment, issues of open access outside of journals have not yet been resolved.

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

We would argue that this is a much larger piece of work that sits outside of the current REF cycle.

## Page 10: Institutional level assessment

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

As per University Alliance, we would oppose the creation of a sub-profile for institutional level environment. A new field should be introduced at the unit level which enables participants to reference an institutional environment strategy. Institutions can then be assessed on the coherence of their unit-level environment statement in relation to a broader strategic statement that carries no separate weighting.

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

See response to question 38.

## Page 11: Outcomes and weighting

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

As per question 38 we would not wish to see a separate rating for institutional environment. We would recommend a 65% (outputs), 25% (impact) and 10% (environment) split.

Q52. 41. Given the proposal that the weighting for outputs remain at 65 per cent, do you agree that the overall weighting for impact should remain at 20 per cent?

No

**Comments:**

No, as per above and the Witty Review it should be increased to 25%.

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

No

**Comments:**

We are unsure whether the institutional impact case studies are practical within the limited time frame remaining in this REF cycle.

## Page 12: Proposed timetable for REF 2021

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

The package of Stern's recommendations is excellent. Our concerns are around the timing of implementing all recommendations. We are halfway through the REF 2021 cycle and some of the proposed changes are major. For this reason we have proposed a series of interim measures for REF 2021 but with a view to full implementation of Lord Stern's recommendations by 2026/27.

## Page 13: Other

Q55. 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?

Having modelled the REF 2014 results using the Stern recommendations we are concerned that the overall impact of the changes will be to reduce the GPA across the sector. Although a small number of HEIs will benefit, the majority of institutions will see a significant reduction of GPA given the need to submit all staff. This will result in a decline in the sector wide GPA (we estimated between 15-20%). Almost certainly this will be viewed negatively by the media and we would question whether the changes will improve the reputation of research in the UK.