

Questions for consultation (listed in appendix A of HEFCE document)

Overall approach

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

We welcome the proposal to maintain an overall continuity of approach with REF 2014 and our answers are framed in ways that point to the importance of understanding what continuity entails and what its benefits are. We agree with Lord Stern's findings that the processes used to assess research excellence – especially with regard to outputs and environment – are readily understood by the community and have generally delivered well in the objective to improve research quality. While impact is a newer element of assessment, REF 2014 demonstrated the many ways in which the HEI sector was now embedding impact into the research environment of all units of assessment.

Unit of Assessment structure

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

The report from sub-panel 35 made clear the benefits of the multidisciplinary composition of the panel for REF 2014 bringing together expertise from Music and Drama, Theatre, Dance and Performing Arts which had formed two different sub-panels for RAE 2008. The composition of the panel ensured that research outputs could be assessed by teams with expertise across a number of sub-disciplines, allowing for enhanced mechanisms for assessing interdisciplinary outputs. There was, however, an element of unease at a situation that had brought Arts and Humanities disciplines, which are not well represented in the British Academy, into new larger sub-panels, while allowing for certain disciplines to remain in discrete sub-panels. We would welcome a greater degree of consistency in this area to ensure appropriate parity. Furthermore, we do believe that the position of Film/Screen and Media Studies warrants further consideration. Outputs were submitted to a broad number of sub-panels in Panel D. Mechanisms for ensuring robust and consistent assessment included the use of shared assessors for sub-panels 35 and 36 but it is worth considering how revisions might be made to ensure increased visibility and consistency of assessment in these disciplines.

For REF 2014 there was no separate sub-profile for outputs for the different areas but reference was made to these areas in the reports made to the HEIs. Sub-panel reports also featured useful information on the state of each of the disciplines represented within the larger multidisciplinary sub-panels. We would wish to ensure moving forward that helpful, productive feedback is given on different disciplinary areas while always ensuring that staff members working in small sub-disciplinary fields are not exposed in ways that might make them vulnerable to institutional performance management.

Expert panels

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

We welcome the commitment to ensure that the exercise continues to be based on expert review with appointed panels including leading specialists in their fields and individuals with experience of commissioning and using research in non-HEI contexts. We welcome also the commitment to retain the two-tiered structure.

We foresee an issue with development of the panel criteria and submissions guidance simultaneously; broad sub-panels such as 35 draw on different disciplinary expertise with robust criteria generated with feedback from a range of disciplinary areas. This might be compromised with a structure that allows for only the Chair of the sub-panel to be present at this stage of development. There will be issues relating to a sense of involvement (if sub-panel members are excluded from determining criteria – see below). That said, it might be possible to have a sub-panel chair, deputy chair and if necessary representation from a few other sub-disciplines that may not be covered by the chair and deputy to work on the criteria before a full sub-panel is appointed.

It is crucial that industry sub-panel members are appointed early into the process and feed into the development of the criteria.

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

There will indeed be a practical difficulty for individuals in taking on such a significant role with only a short time between appointment and the role beginning. This was evidenced in some of the feedback from sub-panel assessors appointed after the intentions of submissions during REF 2014. While the intentions of submissions did reveal some shifts in disciplinary areas from RAE 2008 identified in the sub-panel report – and it is key that the sub-panels are fit for purpose in terms of coverage – it may be desirable to have a number of sub-panel members for the criteria setting phase, drawing on expertise from REF 2014. The experience of 2014 should be revisited and built upon. Did the REF 2014 criteria work? How can they be made better? What has changed in the field since that might require amendment to the criteria?

If there is to be genuine ‘compatibility’ between sub-panels and the main panels, then that comparison must be based on comparability of expertise – that is, on recognition of the equivalence of experts across different disciplinary areas. That means those experts should be given their due, and have a say in the forming of assessment criteria. To ensure expert equivalence requires the bespoke input of disciplinary and specialist expertise at the point of assessment (i.e. the sub-panel level). These are also the people who have to apply those criteria. The forfeiting of sub-panel involvement could result in the loss of this level of fine scrutiny in determining robust and relevant criteria for capturing expertise at the level of subject specialism and related inter-disciplinary engagement.

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

We welcome the commitment on the part of the funding bodies to identify ways of mainstreaming equality and diversity considerations among all participants, at all stages of the appointment process. As part of this process, we would ask that definitions of categories be aligned with other research bodies to aid with clarity: the definition of 'early career researcher', for example, should be the same as for RCUK.

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

We would not wish to see self-nomination for panel members. Nominations from academic associations and other bodies with an interest in research allows for the expertise of the applicants to be commented on by bodies/organisations with experience of the applicants' competencies, skills and expertise in the required areas. For sub-panels representing a range of disciplinary areas, the Chair might not be in a position to make an informed judgment on the applicant's experiences. An open nomination process could only work if evidence could be provided that the nomination had the support of the relevant subject community (ie not just the applicant's HEI – open nominations could lead to HEIs dominating the process). There would be implications for the overall timeframe for recruitment by open nomination.

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

We agree with the proposal to require nominating bodies to provide some equality and diversity information but would want to ensure that this is nuanced, not burdensome and not be scaled to large organisations. It could be in the form of a statement about how E&D information has been taken into consideration.

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

We would like to see the Creative Industries Federation listed as a nominating body (<http://www.creativeindustriesfederation.com/>). Also, the British Association for Film, Television and Screen Studies, a professional association for Screen Studies (see www.baftss.org).

Staff

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

While we welcome the principle of a greater alignment of HESA cost centres to the REF, we do not think that this would currently give an accurate picture of research active staff. Amendments would need to be made to the HESA system to ensure the data was fit for purpose. Currently most HESA data is collected on the basis of teaching, primarily, and it is difficult to discern the role of professional staff, researchers, and independent researchers such as post docs, in the UoA based on HESA data as it currently stands.

Furthermore, while certain subjects (Drama, Music, Dance) are in one cost centre, Screen/Film and Media Studies is in another. There needs to be some attention paid to how cost centres correlate to the current position of institutional research cultures. In the case of Screen and Media Studies, it may well be worth considering aligning it more closely with drama, music and dance: film and design are frequently affiliated to drama departments, sharing both departmental infrastructure and resources, as well as methodological approaches – for example, in practice research.

We would also wish to draw attention to the importance of data that might not come via HESA cost centres – as with funding for research, especially (arts based) practice research, that might be allocated to the researcher or a performing arts company that he or she is associated with independently of their HEI. It is important that this data can be narrated in REF 2021 as it can form a key mechanism for generating research that has wide applicability and currency outside the HE sector.

Question 8: What comments do you have on the proposed definition of ‘research-active’ staff?

We welcome, in principle, Lord Stern’s recommendation that all research-related staff should be returned to REF, but it does rather depend on what is entailed by the quantifier ‘all’ in relation to ‘all’ research-active staff.

All staff on a standard teaching/research contract will be counted, even if they do not do research, simply because of existing arrangements (not actual practices). In this instance, HESA cost centres hide more than they reveal. Some institutions simply by virtue of the disciplinary field they are in (especially but not exclusively conservatoires) have high staffing levels, where a distinction is made between academic staff engaged in vocational training (often bringing industry-related expertise with them, frequently part time) and those who bring more conventional academic-related activities to the institution and discipline more generally (including researchers). Sometimes they coincide; frequently they do not. If the result of the consultation will require all research staff to be submitted, then it is only fair that institutions be permitted an opportunity to comment on actual expectations and practices so that the data accurately reflects the distribution of research, teaching, KE and professional practice, particularly in subjects that are industry-focused. Not to permit this would be to prejudice the exercise in favour of ‘traditionally’ academic research.

One response from HEIs might be to alter contracts, and this risks the emergence of a ‘teaching only’ sector, into which colleagues might be locked in perpetuity. It would also be burdensome, fiercely resisted – not least by UCU – and very difficult to achieve in the timescale. Such a divisive development is to be avoided.

A better approach would be for HEIs to propose clear, structured and auditable processes by which research is a requirement of submitted staff and built into workloads: clarity and accountability would be essential. One model in the sector – though not the only one - is that of Research Institutes, which function as supra-disciplinary homes for researchers in cognate areas. Typically, academics are invited to

apply for membership of an Institute, which is approved based on a judgment of research achievements and future plans, and which forms part of the appraisal process and determination of workloads.

It is worth considering that some HEI staff who have come from industry contribute to the research and impact infrastructure through innovation and KE activities without producing REF-submittable research outputs. How might their contribution (in view of the aspiration of encouraging greater collaboration with industry) be recognized and acknowledged?

In view of the proposed shift to the identification of research-active staff through HESA coding, we would not welcome determination of the number of outputs through taking an average of the eligible staff over a set period and would prefer a census date be used for this calculation.

We also recognise that it may not always be easy to identify research-related staff, as per the capture of individuals employed as research assistants, and welcome the measure of independence to be included in the definition of research-active staff.

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

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

We welcome the proposal to require an average of two outputs per full-time equivalent staff member returned. We would not favour a sampling approach.

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

We would welcome a maximum number of 4 outputs for each staff member to ensure that submissions are not based on the work of only a small number of individuals. Putting a significant amount of pressure on a few senior academics could encourage departments to draw financial support for research 'upwards', depriving mid-career researchers and ECRs of much needed institutional support, such as sabbaticals, or loading heavy teaching commitments on mid-career academics. The maximum permitted from researchers on fractional contracts needs to be carefully monitored as well, to avoid the suspicion that they are 'parachuted in' at the last minute to boost – and, therefore, skew – the performance of a UoA. If the maximum were to be established at 4 outputs for full-time staff, then an upper limit of 3 would be permissible: if an upper limit of 6 were retained, then researchers on fractional contracts should be permitted to submit no more than 4 outputs.

A reasonable approach is one that spreads the responsibility proportionally and fairly – more would be expected of those in a senior position, but not to the detriment of the overall ecology of research in a department or institution.

There are concerns about how what is proposed might encourage HEI-level decision-making that would effectively remove agency from UoAs. Assessment of research quality needs to be made at UoA level.

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

We would welcome consideration of a zero requirement in some instances – ECRs appointed in the final two years of the census period, staff making the move from industry part way during the REF census period, development of staff making the transition from KE to research, where there are a large number of staff on fractional contracts who would be expected to submit 1 output each, complex circumstances or extended periods of leave. There could be an option of ‘percentages’ of staff that could be permitted under zero – up to 15% of the total FTE classified under research/teaching. This would address some of the points made in Lord Stern’s report about the encouragement of long-term research projects.

The uncoupling of outputs from individuals allows for a greater focus on the unit and its research culture but this may involve a greater dependence on ensuring the research areas are narrativised in the environment template.

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

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

No

We do not see acceptance for publication as a suitable marker to identify outputs that an institution can submit for the following reasons.

1. It is sometimes hard to show where, precisely, ‘an output was demonstrably generated’. For example, consider a book that might have taken 6 years and would have been put forward for double-weighting in REF2014. Four years of the research might have been spent at one HEI with one sabbatical, and two years at another HEI who granted a second period of sabbatical leave. The institutional affiliation will be with the second HEI but the first may legally claim it was ‘demonstrably generated’ there and this is where the academic was based when the work was accepted for publication. It is thus extremely difficult to qualify where an output was ‘demonstrably generated’ because generation could be across two or even more institutions. (This might especially be the case with chapters or articles submitted to REF 2014 that form part of an extended book project for REF 2021.) How might this be recognised in an ethical manner?
2. Some projects are accepted for publication without any word of the manuscript being written – this may be the case with a monograph or edited collection, or an artistic commission, which could be accepted while a researcher is at one institution, but researched and written/produced at a second. Would the first institution hold ‘ownership’? There is no consideration in what is proposed to the different timetables involved in publishing or disseminating research.

3. What happens to outputs that don't have an acceptance date for publication, as per creative practice? What happens with the commission for an opera? Is ownership determined by the date of commission? The date of completion of the score? The date of performance? It is very hard to 'date' when exactly a work originates (artistic or academic) – certainly it is irreducible to the point at which it is commissioned; indeed, it could be possible for a work to owe its entire existence to experiences of an artist/ academic based at one institution over a number of years, working through informal collaborations with colleagues, discussions, experiments, without any commission at all
- b. What challenges would your institution face in verifying the eligibility of outputs?

We would have problems with outputs generated over a period of time by researchers employed across more than one institution. We would not wish, ethically, to erase the contribution of other HEIs to outputs; we also feel that what's proposed in the consultation document doesn't recognise the role that non-HEIs play in the generation of outputs. Artistic production – even where it leads to research outputs – is rarely developed solely in the context of an HEI and is frequently collaborative, with a variety of external stakeholders.

How would HEIs decide on ownership of outputs? There may be instances of litigation and these would favour large institutions who would have the resources to pursue such cases through the courts.

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

Non-portability would have a negative impact on different groups in the sector.

1. ECRS already finding it difficult to secure employment within HEIs might be further disadvantaged by this proposal. What happens to a PhD completed at one institution, and semi-converted into a book while the author is on a Teaching Fellowship at a second institution; who then owns it? Or an independent researcher who completed a book while not affiliated to an HEI. Who then 'owns' it? HEIs may be even more reluctant to 'invest' in ECRS if there is concern about whether they bring REFable outputs with them.
2. A new kind of gameplay may come into being with academics delaying publication to secure a lucrative new contract at an existing HEI or a new HEI.
3. How might this affect job cycles? Institutions may delay appointing staff to secure a maximum REF return and this may adversely affect early career researchers looking to move in the middle of a REF cycle. It could encourage an exodus to the US or Europe, resulting in a further brain drain and hamper a level of movement within the UK that has allowed departments to bring in new blood and revive their research culture.
4. While the Stern Review noted that non-portability could prove helpful to those smaller institutions whose staff have been particularly subject to poaching prior to the REF (paragraph 99), we would argue that what is proposed may result in a new stagnation with researchers feeling unable to move because this would

harm the performance of their new HEI. Richer institutions could benefit by having the funds to keep 'prize' researchers with generous salaries.

5. We would be concerned to see a situation where an institution's submission may be made up of a very high proportion of outputs from researchers who left the institution but cannot take their outputs with them. How would this give an accurate picture of the vitality and sustainability of the unit?
6. One researcher mentioned that they had produced an output at an HEI effectively on a contract where research had to be conducted in their own free time. They felt unhappy that they were losing 'ownership' of an output realised in their leisure time rather than during their working week. Researchers are very concerned that intellectual and creative proprietorship of their own work is being diminished by what is proposed here. What are the longer-term implications of the de facto denial of the ownership of one's own intellectual and creative labour, in which sole proprietorship (in terms of REF) is located with the institution?

So while we welcome the need to acknowledge institutional support for researchers, we are very sceptical that non-portability is the way to achieve this.

It is very important that the inroads made on equality and diversity in REF 2014 are not lost and that staff with complex circumstances and periods of parental leave are supported in their research journeys.

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

We recognise the benefits of this possibility, although acknowledge also that there would be a significant burden involved. How would the proportionality be allocated? We would therefore argue for shared ownership as the most ethical proposition which would allow institutions to ensure all those who had contributed to the output (individual and institution) would have their contribution recognised. This happened in REF 2014 with staff employed on fractional contracts at different HEIs who could submit the same outputs to both institutions.

For REF2021 non-portability appears on a series of levels to be unduly burdensome. Perhaps non-portability should be signalled for future REFs to enable HEIs to put in place efficient systems for recognizing investment ethically and robustly, collecting the relevant metadata to map the development of outputs.

For all the reasons outlined above, we favour the portability of outputs in REF2021.

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

No, as not all research active staff have such an identifier.

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

We see the benefits in removing the Category C category but recognise that there may be Emeritus Professors who have made a valuable contribution to a research environment who could be disadvantaged by what is proposed. Perhaps Emeritus Professors who have retired during the Census period could be included. There also needs to be further consideration given to the role of 'independent scholars', who may not have contractual relationships with a given UoA yet still contribute to it.

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

Research assistants in our disciplines found it disempowering that they could not be entered for REF 2014. In view of the emphasis on inclusivity in this document, we would welcome changes that would both ensure greater clarity and allow for the research assistants – often self-defining as ECRs -- to be included in HEI submissions. Very specific guidance on research assistants and eligibility would be useful so that the process of submitting staff is as unburdensome as possible.

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

A minimum of 0.2FTE is highly appropriate.

As an institution/cluster of institutions in the Creative Arts what is proposed here is problematic as fractional contracts are key practice, allowing us to encourage and pursue collaboration between HE and industry. Any proposal to shift the 0.2 FTE minimum could really affect, in a detrimental manner, our ability to retain world-leading researchers working at the interface between higher education and industry.

We would ask the funding councils to consider the statement for staff on fractional contracts who have research posts at HEIs outside the UK or who have been appointed to positions in the final two years of the census period.

Collaboration

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

A degree of flexibility regarding the number of research outputs to be submitted by a UoA would allow for greater collaboration between academia and non HEIs. The Environment template can offer opportunities for delineating close partnerships with industry. There might also be opportunities for outputs created with industry partners/collaborators to narrate this within an additional information area. There might be a consideration of allowing researchers coming into academic positions from industry to submit 0 outputs to allow for different kinds of contribution to the research infrastructure/culture to be recognised.

Outputs

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

We would welcome the proposal to allow the submission of a reserve output in cases where the publication of the preferred output will postdate the submission deadline.

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

We would encourage the continuation of arrangements made for REF 2014, including cross-referral and a panel structure that brings together cognate disciplines. So much research is interdisciplinary in our discipline that we would have concerns about 'interdisciplinary champions' that might favour a one-size-fits-all approach: that said, if the champions across the panel were required to meet, it might ensure a consistency of approach. We would support both an interdisciplinary identifier and building on the arrangements for REF 2014 which encouraged interdisciplinary collaborations to be delineated in the final section of the template. It is worth recognising, however, that not all interdisciplinary research identifies itself as interdisciplinary. There is no clear-cut way of defining what interdisciplinarity consists of and it is arguable that most arts-based research displays interdisciplinary tendencies.

We would not welcome the introduction of a separate section focusing on interdisciplinary research (mentioned in para. 112). This might have the effect of seeing research that may be interdisciplinary but does not define itself as such being seen as second-rate. REF should be looking to reward excellent research in all shapes and forms. Definitions around inter-, cross- and multi-disciplinary do vary and there is slippage between these categories. The REF 2014 Panel D report made excellent observations on interdisciplinarity in arts and humanities research.

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

We agree with a proposal to use quantitative data to inform the assessment of outputs where considered appropriate for the discipline. It is imperative, however, that subject specialists should determine whether metrics are appropriate, what form they should take, and how much weight they should have in evaluating the output.

We would also wish to reinforce the importance of a robust system of peer review that draws on the expertise of experienced researchers and industry representatives who have an awareness of engaging with (and drawing on) research in their own work. It is essential that the principle of peer review continues as the primary mechanism for evaluating research, informed by concrete, reliable data and other carefully selected indicators.

Impact

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

We agree with the proposal to maintain consistency where possible with the REF 2014 impact assessment procedures.

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

We welcome a broadening of the definition of impact that recognises the many shapes and forms that impact takes.

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

We welcome the benefits of the aligning of these definitions of academic and wider impact. In view of the proposition in paragraph 78 that 'ground-breaking academic impacts, such as research leading to the creation of new disciplines, would be more appropriately assessed through the output or environment element of the REF' we would welcome clarification of what would be included as part of Academic impact and what would be seen as more appropriate for inclusion in the output or environment sections of the REF.

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

Reach appeared to relate to breadth of engagement and significance to depth of engagement. Excellent impact could be identified in terms of reach and/or significance, with a balance of the two determined by the demands of each case study. We would welcome the flexibility this facilitated.

There were some complications in REF2014 about significance also being used as part of the criteria for research outputs' assessment in slightly different ways and this might be worth considering further.

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

The relationship between dissemination and impact needs to be very clear. It is not always apparent that there are changes and benefits arising from public engagement. We would encourage further guidance on the submission of impact emerging from public engagement.

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

No, there needs to be a degree of flexibility here.

It is often difficult, as with impact based on a body of work developed over a long period of time, to attribute ownership of the research to one institution. Researchers did report challenges in tracing information and evidence relating to staff who have left an institution. More worrying, institutions were uneasy about submitting staff whose research might encompass publications/outputs at two different institutions. Impact can sometimes be related to underlying research produced at different institutions and this needs some further consideration. For example, the AHRC encourages collaboration between institutions – not least through the academic collaborations initiated by the Doctoral Training Partnership Scheme. It is quite conceivable that the issue of complex research configurations operating through partnerships, across fields and institutions, will intensify, and for this reason it will be increasingly important to facilitate ways of sharing impact case studies. The issue of portability warrants closer attention for the reasons delineated in the answer to Questions 10a-c.

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

We have real concerns about this proposal. The impact template did allow for a discussion of how all staff (and not simply those whose impact case studies were being presented for assessment) were contributing to the development and realisation of impact within the UoA. If information on the approach to supporting and enabling impact is to be captured within the environment template, this represents a subtle increase in the weight that is placed on impact by extending it to 'supporting and enabling' within overall environment. In effect the decision to assess impact only on the basis of case studies could undermine the emphasis on inclusivity (with the proposal that all researchers be submitted to REF 2021). Impact would possibly therefore gravitate around the work of a very small number of researchers. So, there are some problems in decoupling strategies for generating impact from the impact case studies with the strategies for developing impact now being seen as part of the assessment of environment.

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

There are obviously ethical issues involved in the minimum requirement shifting from two to one case study. As the scores for individual case studies would therefore be available, they could be used by HEIs for performance management purposes. We also, however, recognise the burden for small institutions of producing two case studies and the required number of case studies for REF 2014 having an effect on staff selection. Perhaps there are longer term benefits to folding environment and impact together that warrant further consideration. Impact would then be widened into an institutional

consideration at the level of research environment and how an institution deploys, encourages and supports the realization of impact.

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

While we welcome the proposal to include certain mandatory fields, we do have a concern with what is proposed here. Not all outputs have DOIs. This needs to be taken into account. The proposed template seems to see research outputs in terms of articles (which do have DOIs). What happens here to practice outputs or other forms of (non-print based) output? We have some concerns about terminology that seems to present articles as the assumed output underpinning the research.

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

We would welcome the further optional fields. This might make for a longer template but it would enable the conditions leading to impact to be listed and narrated.

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

Some UoAs struggled in REF 2014 to locate outputs that had generated impact that met the 2* eligibility criterion. In effect, the research had to be assessed as meeting the 2* criterion before the impact could be assessed. Any criteria based on standards of rigour will therefore require the outputs to be assessed (burdensome for the panels). Examples of impact arising from research activity and bodies of work might be easier – but the portability issue will discount particular impacts where the body of research might have been undertaken at different institutions. Again, this warrants some consideration.

We welcome the use of the term ‘bodies of work’ in the discussion of impact in the consultation document. Research that generates impact may well be embedded in a long-term project that produces several, related outputs – hence a ‘body’ of work. The issue is particularly sharp for research by creative practice, which frequently does not fall easily into a REF cycle. Also, bodies of work are not always undertaken at single HEIs, and there will be a tension between such work and the requirements of non-portability of research, if that proposal is adopted. The issue of industry partners who are part of the generation of the impact also deserves attention.

We would like to see HEFCE give some attention to the term ‘underpinning research’. This suggests a linear relationship between ‘outputs’ and ‘impact’ which is problematic for our discipline. In line with the increased focus on ‘body of work’ in the consultation document, we would welcome a consideration of the use of the term ‘associated research’ to replace ‘underpinning research’. In disciplines where practice as research is a recognised mode of investigation, the relationship between the dissemination of findings and impact cannot be easily unpicked. In the Creative and Performing Arts, it is not unusual for impact to feature as part of the whole research journey rather than as an annex conceived after the findings have been disseminated. Where performances, installations, exhibitions etc are placed in front of a public, or have involved wider users, feedback from those stakeholders on the process and / or outcome *as it relates to an explicit or stated research intention* can productively form part of the process of

documenting the project's significance, originality and rigour. Impact is thus often embodied within the research and not generated subsequently. 'Associated research' functions as a more effective term for capturing the relationship across research and impact.

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

Yes. We do, however, think that the term underpinning research warrants some consideration for the reasons given in our answer to Q29.

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

How will the definition of rigour be realised? The assessment of outputs is based on rigour, significance and originality. How can rigour be decoupled from significance and originality? Might this also lead to outputs being assessed as 'unrigorous' and therefore rendering any possible impact unclassifiable? How might a case study present evidence of rigour that doesn't necessitate a further assessment of the output(s)? It is far from clear to us how the question of whether the underpinning research is or is not of 2* standard necessitates singling out rigour for particular attention. The question of 'how' to assess rigour would seem to require a specific part of the impact case study to attend explicitly to methodological issues. But again, we find it difficult to see how one can disaggregate the rigour of a methodology from questions of its originality and significance.

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

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

There will be concern about any attempt to present standardised measures that could signal a hierarchy of evidence which may not be applicable to certain types of impact. There could be clear guidance on standardised numerical measures – consistent numerical units could support both the panels' assessment and offer indications of best practice to submitting UoAs. A set of guidelines on suggested types and standards of data would be useful.

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

We would welcome the development of guidelines for the use and standard of quantitative data with the Forum for Responsible Metrics.

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

The guidance should encourage clearly-written case studies, with credible accounts of the relation between the research and the resulting impact, supported by persuasive corroborating evidence. Each case study should present the data and information it needs to evidence the benefit.

Impact case studies too often prioritise the role of the unit or HEI to the detriment of a non-HEI project partner. There are ethical issues here that merit consideration. Labour and expertise need to be credited and acknowledged, with the contribution made by non-HEIs to research impact openly articulated.

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

Continuity will necessarily be dependent on a degree of additionality, as with additional beneficiaries/benefits in the 2014-20 period, new statistics and data, and possibly new research underpinning the impact. The relationship between continuity and additionality cannot easily be disaggregated. Surely there will be new corroborating evidence provided to demonstrate the impact? It would be a shame if developing impacts identified in the REF 2014 period could not be presented at a further stage of development in 2021. REF should encourage the presentation of impact in any shape or form that relates to the criteria.

Environment

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

We agree with the proposal to improve the structure of the environment template and introduce more quantitative data into this aspect of the assessment. REF 2014 did allow for the presentation of HESA data but this was in a separate document that had to be cross referenced by panels to the Environment template. Bringing the data together will be useful as it will allow the data to inform the narrative.

It is important to note that data should be understood as commensurate to the size of the submitting institution – there is only so much that can be evidenced through small data sets whereas elsewhere the same data would be informative because there is enough of it.). There will also be disciplinary differences to account for, too. We would like to see consideration of differences in scale and resources in collecting it, given the fact that Drama departments are positioned in institutions of different scopes and scales.

It is so important that we recognise the benefits of the initiatives put in place to support equality and diversity for REF 2014. These made a huge difference to ECRS, those with complex circumstances and staff who had had periods of parental leave. Equality and diversity needs to be given due consideration in the structuring of the environment template.

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

Drawing on the data requested for REF 2014 would ensure continuity (eg grant income, research degree completions etc). We would welcome opportunities for data that evidences vitality as well as sustainability (eg research degree students registered at the cut-off point in 2020). It would also be useful to collect data on how researchers have accessed the support that is nominally available to them: for example, the number of sabbaticals taken, levels of QR funding actually disbursed to the UoA, conferences attended.

It is worth noting also that research in the creative arts is often by bodies that will pay the researcher directly (eg Arts Council England, orchestras, opera houses, theatres, production companies, national and local government bodies). This data is often held by HEIs as it evidences the breadth of funding sources for research rather than simply the data collected through HESA. Sub-panel 35's report for REF 2014 (para. 71) noted the ways in which projects funded through these sources were narrated in the Environment templates. (For the importance of this data, see also Mike Thelwall and Maria M Delgado (2015), "Arts and humanities research evaluation: no metrics please, just data", *Journal of Documentation*, Vol. 71 Iss 4 pp. 817 – 833 <http://dx.doi.org/10.1108/JD-02-2015-0028>).

Data should be provided on non-HESA research income with a mode of ensuring that the collation of this data does not become burdensome for an institution; this might be best reported in free text form. Diversity in the sector is not simply about a one-size-fits-all approach to research income that only recognises the legitimacy of HESA data. The relationship between research, impact and public engagement in our sector is not one replicated in other Arts and Humanities disciplines. For disciplines such as Drama, Theatre and Performance, where practice as research is a recognised mode of investigation, the precise relationship between the dissemination of findings and impact cannot be easily distinguished.

Information on destinations for research degree students might also evidence the vitality of the research environment.

Higher Education Business and Community Interaction (HEI-BCI) Survey data might also be drawn on in delineating approaches to impact.

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

Collaborative research with non-HEI partners could (and should) be further encouraged. HEIs are highly competitive and do not always have structures in place to encourage interdisciplinary research across different institutions. SCUDD/TaPRA would welcome due consideration be given to the ways in which research realised with a range of partners (both HEI and non-HEI) be recognised and further stimulated. Joint submissions with research-active non-HEIs might be considered, as might joint

submissions between units in different HEIs. Any changes should ensure that the process not result in additional burden.

We would therefore welcome the opportunity for the environment narrative to provide more recognition to universities' collaboration beyond HE while also recognising that there should also be an opportunity for this information to be presented with research outputs realised with industry partners where appropriate. As these collaborations take many shapes and forms, the funding councils might want to encourage flexibility in how these are documented/narrated with a relatively open section on research collaborations beyond HE. It is important to ensure that such collaborations are not then repeated in any impact sections of the template.

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

No.

We would be wary of providing additional credit to units for open access for the following reasons. Certain outputs lend themselves more easily to open access format (articles and book chapters, for example). We welcome open access where possible. There are at times copyright issues with images or video material when placing an article open access, and the research findings of the piece may be compromised when only textual material is placed open access in an institutional repository. For particular types of performance output, open access may not be possible, as with a performance realised with a number of industry collaborators who may be reliant on box office income or product sales. Would Arts Council England expect a piece of creative practice to be open access? This might bankrupt creative industry organisations and lead to a destabilising of the creative industries ecology in the UK. Would novels be expected to be open access? How might this affect the livelihood of artist-researchers on fractional positions in HE institutions? Different disciplinary practices need to be respected and taken into consideration in discussions of open access. What are the implications of open access for patents, digital and broadcast media, performances, designs and exhibitions, and software design? We are not clear also what was signalled in p. 116 by 'in a form that allows re-use of the work'. Is the model here one where the background research can be opened up as well as the output, possibly through institutional repositories?

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

Any plans for the open access of research data must take into consideration legal, ethical and regulatory frameworks and norms. We would wish to avoid any situation where these issues are compromised or data taken out of context in ways that are harmful or even dangerous.

Institutional-level assessment

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

A process of reporting at an institutional level would ensure consistency on one level, but the ways in which clusters of researchers draw on different aspects of institutional provision might not be evidenced or recognised. It's not just about what resources an institution has but what a unit decides to do with them. (This has much to do with strategy and planning.) Any shift might therefore create an approach that failed to recognise the nuanced research strategies and plans of individual units. It's not what you have, it's what you do with it that matters. As noted in our response to Qu 34b, HEIs already have data that would illustrate the ways in which UoAs negotiate institutional strategies, systems and opportunities, and these could be formalised in the environment section.

The introduction of both an institutional-level environment statement and impact case studies assumes that all institutions are of a particular multi-disciplinary scope and scale. This is evidently not the case. How might such a proposal affect small specialist institutions or HEIs focusing their returns to the REF in only a small cluster of disciplines? Might it force particular types of research into an artificial framework? HEIs may not be clear about what's required and misjudge the statement. Wouldn't it be less burdensome to simply have a section where institutional support is addressed and a UoA explains how they have drawn on it?

Institutional level reporting as conceived here might also be weighted to favour large, multi-faculty institutions like those of the Review Steering Committee members. Excellent research is produced at HEIs of different scales and scopes, including small, specialist institutions as well as large, multi-faculty institutions, and it is this imperative of respecting the rich ecology of research HEIs in the UK that has, we would argue, led to world-leading research.

There is also an anomaly in this proposal: the REF aims to reward excellence in research, wherever it is to be found, yet institutional level assessment will lead to the evaluation of the research of a UoA being determined partly by judgments made about research, impact and environment in (probably) another disciplinary area and over which it has no control.

There are also concerns in the sector about who is qualified to review the institutional level environment statements. There are very different economies of scale here and it is key (under diversity and equality criteria) that differences between institutional settings are fairly captured. There needs to be clarity about the relationship between institutional level panels and sub-panels.

For these reasons, we would not favour the introduction of institutional-level assessment of impact and environment.

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

We would wish to signal the points made in our answer to Q38. This approach unwittingly favours larger, multidisciplinary HEIs that are able to resource institutional-level interventions; it might not recognise strong strategic planning at UoA level. It would also have implications in terms of equality and diversity, favouring a one-size-fits-all approach. We would instead argue for an approach that allows UoAs to delineate how they draw on institutional opportunities/provision in the development of their research environment. We have concerns that small specialist institutions, smaller HEIs and larger HEIs submitting selectively to the REF would be disadvantaged by what is proposed (eg doctoral training centres) and any plans to introduce an institutional level assessment should recognise the different types of HEIs that make up the UK's research culture.

Outcomes and weighting

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

We have concerns about the introduction of institutional-level assessment (see our answer to Q. 44). It is quite clear that small specialist HEIs and larger HEIs that submit selectively to the REF will be entirely disadvantaged by an institutional-level assessment. For small HEIs, the institution and the UoA are often one and the same thing. We believe what is proposed here will favour large multi-faculty HEIs and does not recognise the diversity of the UK's HEI sector.

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

We would welcome impact (ie the case studies) remaining at 20% because it is effectively also being recognised in environment with the proposal that the UoA's approach to impact is articulated and presented in this template. As such the weighting for impact will effectively be increased to closer to 25%. An increase of the impact case studies to 25% will effectively place impact closer to 30%.

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

We do not agree with the proposed split of the weightings between the institutional and submission level elements of impact and environment for the reasons given in answers to Q. 40 and 41.

Proposed timetable for REF 2021

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

The timetable seems sensible. We would want to see details, in the next iteration, of the appointment of sub-panel chairs and sub-panel members and assessors, which will ensure that those appointed will have the time to undertake the work that is required of them.

Other comments

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

We welcome the commitment to continuity but would urge the Funding Councils to ensure that any changes to REF do not compromise any of the following: the Haldane principle; the commitment to excellence identified as the key driver for investment; the commitment to curiosity driven research; the importance of an independent, expert peer review system; the need to ensure that QR funding continues to fund research across the broadest range of STEM and STEAM subjects, respecting and recognizing both interdisciplinarity and diversity.

Much of the consultation document is about institutional level research policy, but the REF also offers a remarkable opportunity to examine the health of a sector at a particular moment in time, encouraging self-reflection and identifying trends and developments. In our case, such reflection often relates directly to developments in the creative industries. The move towards institutional level assessment could compromise the focus on disciplinary fields, and is of great concern to small specialist institutions, where its imposition is likely to be highly punitive.

The importance of the Environment template, where the contribution of researchers to the environment for research is narrated, in restricting gaming should be recognised. Equally with Impact, the template allowed for a discussion of how impact has been generated by the unit – the impact case studies can too often be more about benefits resulting from the research of individual researchers. REF needs to ensure that the mechanisms for evaluating the wider culture of the unit are preserved.

Diversity of scale and practice (across disciplines and institutions) needs to be recognised and supported in any of the proposed changes to REF.

The recognition of larger and longer-term research projects that was signalled in the acceptance of the principle of double-weighting is welcome and should be a part of REF2021. It has been reported to us, however, that some HEIs overruled individual researchers and UoA leaders, believing that double-weighted outputs would not be acceptable and their submission would be in some way detrimental to the UoA. It would be helpful if the REF 2021 guidelines underlined forcefully that this was not the case.

In relation to paragraph 67, we would welcome due consideration is given to the matter of evidencing and documenting practice research and the role of portfolios in this process. Comments in a number of the REF 2014 Panel D reports (eg subpanels 34 and 35) drew attention to the challenges involved in presenting the research dimensions of creative practice. We would therefore welcome a set of agreed principles on the production of portfolios that would ultimately reduce burden, encourage compatibility and allow for the research to be more searchable and accessible. This would serve to signal more clearly the breadth and depth of practice research currently undertaken in the UK, thus further enhancing the UK's world-leading reputation in research and innovation. The portfolios might also function to reduce burden by allowing for the associated research relating to impact to be evidenced.

