



Universities Scotland's submission to REF 2021 consultation on the draft guidance and criteria

October 2018

Guidance on submissions: Part 3, Section 1: Staff details (REF1a/b)

Question 3b: Please provide any comments on Part 3, Section 1

Significant responsibility for research

There was an expectation that the guidance would provide greater guidance on what is 'significant' responsibility for research.

Concern has been raised around how to provide appropriate audit evidence where staff do not have significant responsibility for research, for example, it may not be appropriate to share objectives or annual review information outside of the institution.

This continues to present significant challenges to institutions using the Category A submitted route.

Data requirements

The data requirements of former staff (paragraph 148) are greater than for current staff (paragraph 143) and might also be more challenging to source and calculate. It is not clear that this additional burden is justified.

Concerns have been raised that institutions will need to use a number of new flags in HESA when codes of practice might be immature and systems not in place. The efforts involved in flagging staff with significant responsibility for research (e.g. for institutions using HE2000 contracts) should not be underestimated.

The recent changes to the HESA staff record will be challenging given codes of practice are not in place now and there will be a very short window between code approval and data submission (particularly for communication with staff). We recommend the funders engage promptly with institutions, including planners, to understand implications and whether timelines are feasible. We note this is described as a trial basis and would welcome information on the trial parameters.

Codes of practice

HEIs should be able to submit codes of practice as soon as practicable and assessment should be on a rolling basis, including before the June deadline. The draft guidance on codes of practice (paragraph 11) notes 'codes of practice should be effective from the point at which this is approved' – HEIs should be able to start using codes based on HEI approval (although recognising this is not the final version).

Question 4: Possible indicators of research independence... Do you have any comments on the clarity, usefulness of coverage of this list?



The list is useful. Institutions would also find it valuable to have a list of Fellowships that Main Panels ruled out as indicators of independence.

Guidance on submissions: Part 3, Section 1, Staff circumstances (paragraphs 149 to 193)

Question 7c: Please provide any further comments on these proposals, including suggestions for clarifying or refining the guidance

Numerous concerns have been raised with the approach, as described, including:

- To recognise the performance of the unit it is important that the impact of staff absences on other staff is recognised, which individual circumstances would not achieve
- Individual reductions (and therefore a variable contribution to the REF) may necessitate that staff circumstances are widely discussed within a unit – generally this information is sensitive and should be kept confidential wherever possible
- The statement in paragraph 152, ‘institutions may wish to manage any effect from staff circumstances on overall productivity within the unit’s submission, without seeking reductions’ could make it challenging to monitor and meet equality and diversity objectives at an institutional level
- Concern was noted that this approach would not meet equality and diversity objectives and could lead to submissions being less representative of the research community.

The majority view is that:

- Output reduction should apply at unit level (unless exceptional individual circumstances whereby an individual can be returned without the minimum of one output)
- Institutions should be able to apply for reductions based on circumstances but have the flexibility to optionally apply those reductions. Reductions in outputs will be need to be identified as early as possible in the process but changes after this may mean that a unit is able to present its research profile without the reduction. So, submitting units should be given flexibility as to whether to use these agreed reductions.
- If the final policy decision is to continue with the approach outlined, the guidance is hard to follow and should be clarified.
- How figures will be rounded (up or down) needs to be clearer for application of reductions.
- Any circumstances that are collected and shared with the REF team/EDAP should be anonymised. The (assumed) commitment to anonymity is not clear in the guidance.

Guidance on submissions: Part 3, Section 2: Research Outputs (REF2)

Question 8b: Please provide any comments on Part 3, Section 2

We welcome that the open access requirement does not apply to outputs underpinning research impact (paragraph 216).

It is not entirely clear in paragraph 221 whether the tolerance applies to a unit or to an institution. A tolerance for 5% of outputs not meeting the open access policy could be very challenging for small units. In extreme cases, for a unit submitting fewer than 20 in-scope outputs, 5% is less than one output. This may be solved by having a larger tolerance at unit level or a tolerance of 5% at the institutional level (or combination of such options)



Question 10a: Paragraph 206b 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). Do you agree with this proposal?

No

Please provide any further comments on this proposal

There are different views across the sector but this does appear to go against a key recommendation of the Stern Review i.e. 'outputs should be submitted by the institution where the output was demonstrably generated'.

Question 11: Do you agree with the proposed intention to permit the submission of co-authored outputs only once within the same submission?

Please provide any further comments on this proposal

There is a variety of views on this issue but concerns have been raised that not allowing this may be perceived as a disincentive to teamwork within a unit and would seem to discourage particular types of research activity.

Question 12a: 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 in UOA 4?

There are different views across the Scottish sector but in the majority view was that we would not support this approach. To our understanding this is directed at a question from Research England to inform Research England's funding model. This is a devolved matter and therefore not relevant to Scottish HEIs, or a UK-wide exercise. While funders may wish to investigate the different costs within a UOA (as SFC intend to do in 18/19 for a number of UOAs) for other research policy purposes this may be more effectively achieved via a separate project to REF submission preparations.

If this goes ahead this could add additional burden to the exercise that is not directly related to the REF. There were concerns noted about the feasibility of this approach in categorising UOA4 submissions given the 'mixed economy' a number of institutions reported.

Additionally, we were also surprised to note that the deadline from the REF team for institutions to commit to participation in this pilot is before the deadline for consultation responses. This prejudices the outcome of consultation.

Guidance on submissions: Part 3, Section 3: Impact

Question 13b: Please provide any comments on Part 3, Section 3

The requirement to provide an ORCID for each named researcher (paragraph 322) seems an unnecessary additional 'requirement' compared to the approach to ORCID for outputs (i.e. ORCID is provided 'where held' (paragraph 143).

The definition of a continuing impact case study (paragraph 310) is very tight and this appears to mean that case studies demonstrating additionality will be considered 'new'. We are not clear on the reasons for such a restrictive definition.



Guidance on submissions: further comments

Question 16: Please provide any further comments on the 'Guidance on submissions', including annexes A-M

Concern has been raised about the much longer word count for the environment template for each UOA. Although there is more to cover (to include impact) the doubling of the volume will likely lead to extra work for UOAs (particularly given an institutional environment statement will also be provided).

Panel criteria and working methods: Part 3, Section 3: Impact

Question 4c: Please comment on the criteria in 'Part 3, Section 3: Impact'...

We are not clear for the rationale for divergence between Panels on the assessment of impact for instance:

- We are not persuaded it is necessary for Main Panels to state different preferences for corroborating evidence for impact (paragraph 299-304)
- We are not persuaded it is necessary for different approaches to indicators of quality between Main Panels (paragraphs 311-315)
- The Main Panel A commentary on continued impact case studies (paragraph 282) implies that new impact is more important than continued impact.
- Main Panel A's commentary on 'significant and developing impact within the current assessment period' falls outside of the continuing impact definition from the Guidance on Submissions. This requires clarification.

ENDS

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