

Consultation on the second Research Excellence Framework

Page 1: Respondent details

Q1. Please indicate who you are responding on behalf of
Subject association or learned society
Please provide the name of your organisation English Association + University English; this is a joint submission from the two subject associations representing English Studies.

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 are in favour of continuity with REF 2014 and with the proposal that changes be incremental and increase in burden avoided. We particularly applaud the decision to retain peer review as the primary form of assessment. Maintaining stability and continuity is important in view of the fact that the process will be overseen for the first time by UKRI.

Page 3: Unit of assessment structure

Q3. 2. What comments do you have about the unit of assessment structure in REF 2021?
We are pleased that no further amalgamation of panels is planned. Cross-panel referral for interdisciplinary work should be encouraged. The approach suggested in para 29 to let sub-panels determine whether they need a separate sub-profile for outputs for the distinct areas they cover is a good idea since these can be extremely varied in our discipline. For this to work, however, sub-panels would need to be set up early in the cycle, in 2018. See our response to question 3b.

Page 4: Expert panels

Q4. 3a. Do you agree that the submissions guidance and panel criteria should be developed simultaneously?
No

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

No

Comments:

Emphatically no! It is essential, both to ensure the confidence of the community in the process, and to enable the panel and sub-panel criteria to capture the full range, depth and granularity of the research fields concerned, that the full sub-panels be involved in the drawing up and agreeing of sub-panel criteria. Consultation by a panel chair is not the equivalent of a working panel which (i) has the confidence of the community, (ii) has good representation across a range of subjects and institutions, and (iii) can draw upon the experience of a group of sub-panellists from REF 2014. Convening early in the cycle is also important for a relatively new REF subject such as Creative Writing (UoA 29). It's important for reflecting on and embedding new criteria and processes (e.g. plans for revisions to impact and environment). It was generally felt by the panellists in REF2014 that the assessment criteria were not as refined as they might be for Creative Writing submissions; this will be exacerbated if the subpanel does not convene until late in the cycle. See also our response to question 2. In addition, for planning purposes, panel members and sub-panel members will need to give their HEIs time to adjust workloads (as has been demonstrated successfully in preceding REF/RAEs).

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

Yes

Comments:

Yes, with reservations. The proposals to enhance E&D may not be robust enough to ensure better representation. We would suggest that main and sub-panel chairs be given a target for panel member representation benchmarked against the statistics for disciplines utilised for parallel processes such as, inter alia, Athena SWAN. We would suggest that where it looks as though some groups may be radically under-represented, self-nomination be allowed.

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 of inviting nominations from the major subject associations, and for sub-panel chairs to select from the list of nominees so gathered, with license to seek additional nominations where necessary to ensure coverage of specialisation/ representation, has served the process well in the past insofar as subject expertise is concerned.

We would also strongly propose that the 'two sub-panel principle' utilised by many sub-panels in 2008 and 2014, whereby half the sub-panel members are retained to serve in the next exercise, is continued. This will provide continuity between the exercises and share best practice with new sub-panellists. This should not affect the nomination process, but should be a rule of thumb for nominating bodies.

It is crucial that Equality and Diversity are considered in the process of nomination. Guidance should be issued so as to encourage the constitution of sub-panels where proportions are equal to or better than the Equality and Diversity statistics of senior cohorts in the discipline at large. Equality and Diversity characteristics of membership may be impossible to ascertain for some subject associations, but nominating bodies should have to provide evidence of how Equality and Diversity considerations are figured across their nominations.

To be eligible to nominate a scholarly association or society should have a clear 'Equalities and Diversity' statement.

Where subpanels are permitted to include additional 'output assessors' at a later stage in the process, as was the case for REF 2014, subpanel chairs should be expected to address Equality and Diversity issues as well as appropriate subject and institutional coverage.

Representation should also ensure that diversity across the university sector is taken into consideration. There is the practical issue of getting the balance right in terms of effective panel and sub-panel members with knowledge of the various disciplines and sub-disciplines.

It is not clear from the consultation document if 'users' will be attached to subpanels for impact assessment, as was the case in REF 2014. Without guidance about users, panels and sub-panels will not have robust processes in place.

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

Yes

Comments:

Yes – see the response to question 5a. However, many nominating bodies would find it difficult to provide E&D membership characteristics in the manner anticipated by the consultation document. Some subject associations have memberships composed of departments, not individuals.

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

University English is the new title of the Council for College and University English, so this should be amended on the list of nominating bodies.

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?

HESA data is not of sufficient accuracy or granularity to provide the necessary precision to carry the confidence of the subject communities. It is particularly unhelpful in identifying cross-departmental and interdisciplinary research areas of the sort that the 2021 exercise is anxious to capture and encourage. For the discipline of Creative Writing, HESA data is not helpful or precise, partly because HESA gives the subject area a different title (Imaginative Writing) which is problematic. Thus, the use of HESA data is likely to generate considerable additional burdens, both centrally and in HEIs, in order to untangle the data to the point where accurate submissions to UoAs can be made. It will not eliminate burden or 'games playing' – indeed it is likely to increase the latter.

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

We agree with the principal that all research-active staff should be submitted. However, we have profound concerns that this will lead to some academic staff being moved to teaching-only contracts, with serious implications for the careers of those staff affected, especially involving equality issues, and to the viability of research-based teaching.

The proposed definition of research-active staff using HESA activity codes is too blunt a tool to distinguish research-active staff and capture the variations in practice across the sector. We believe that there many staff in post-92 Universities who fall into this category but whose contracted duties do not currently allot time for the production of research outputs: these staff may however be in the process of being developed as researchers, returning to research after a career break, or undertaking research to inform teaching. Combined with a minimum requirement of 1 item per individual (c.f. 9c), the use of these codes would inevitably force the reclassification of many staff and/or prolonged contract negotiations. This would be a major unintended consequence, with attendant cost implications. It would also militate against the development of more research-rich environments by imposing a drastic split between research and teaching that was not envisioned by Stern. Such an outcome would damage morale, and impact upon a unit's capacity to provide research-informed teaching (including research into pedagogy). Most importantly of all this would be likely to have serious equal opportunity issues, as those most likely to be disadvantaged in this way would be female staff with caring responsibilities.

The proposal that 'a measure of independence is also included in the definition of research-active staff' does not instil confidence that the process will discourage HEIs from attempting proactively to reclassify staff in this manner, either formally or informally, and inadequate detail is provided on what this 'measure of independence' would be (or how wide it would extend).

The way HEIs use Teaching Intensive contracts also needs to be monitored. Submitting departments should be required to provide a full list of their staff, regardless of type of contract, so that assessors can judge the depth of the research culture. Poor practice in the use of Teaching Intensive contracts by HEIs could also lead to potential loss of diversity and equality in REF returns. 100% returns could lead to women, minorities and ECRs being moved off the REF roster by HEIs.

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

We welcome the recommendation to submit all research-active staff; and to decouple staff and outputs. These seem to offer greater flexibility to recognise the diversity of staff research patterns, arising from the varied length of projects of different scales, and the changing place of research in individual workloads at different stages of career.

We believe that an average of 2 outputs, while designed primarily to avoid any increase in the burden on panels, is workable and may have the additional benefit of allowing units to foster more longer-term high-quality projects, reducing some of the perverse incentives arising from earlier versions of the REF, and to better foster and support early career staff.

However, we also recognise that this may disadvantage smaller UoAs where there are fewer members of staff to draw upon to make up for outputs in, say, cases of maternity leave.

If the average of 2 outputs per FTE over the assessment period is used, it is essential that clear guidelines are given, and rules established, to ensure that the resulting submission reflects the real extent of the research activity in the submitting UoA in that period.

For example, if the intention of the REF is, rightly, to capture and assess actual research activity, submissions must reflect the full range of career stages of staff and output types produced in the UoA in the period. This is what is done in overseas research assessment exercises where sampling of research activity is used (as in the Australian ERA, for example). Otherwise, there is a strong temptation to 'game' the system and submit only the work of senior scholars and those output types assumed to be more likely to achieve high scores. In a discipline such as English Literature, History, or Modern Languages, where double weighting is widely used and necessary, the resulting submission might thus be made up predominantly of double-weighted monographs and critical editions, whereas the dominant forms of publication in terms of the number produced might well be journal articles, essays in volumes, and creative outputs of various kinds.

Finally, we would not want the financial base line to be at the 4* level as 3* activity also needs to be rewarded for its intrinsic excellence. The migration of finances to these higher reaches would be deleterious to the research community and have unintended consequences on the self-confidence and careers of many researchers.

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

In Arts and Humanities disciplines 6 seems a sensible upper limit to ensure that submissions are representative of UoAs as a whole. We are assuming that 6 is the FTE maximum, and that the figure will be pro rata for individuals on fractional contracts.

Will the maximum number remain 6 irrespective of whether the minimum is 1 or 0? The higher the maximum and lower the minimum will affect the degree to which submissions can be based on relatively small proportions of staff.

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

We broadly agree that '1' should be a base line, although there is ambivalence about this in the English subject community (see below). It is not unreasonable to expect research active individuals to produce one output of REFable quality over the course of seven years of funded research. The risk with '0' is that the door is opened for submissions to be based on outputs drawn from a very small number of researchers in a unit. However, if '1' is agreed upon, it is essential consideration is given to exemptions: to those on fractional contracts, or to those with particular circumstances (illness, maternity, caring responsibilities).

It is also essential that the considerable unease with '1' within the subject community should be recognised and understood. There is a deep concern that the requirement to submit all research-active staff, with a minimum of 1 output rather than '0', may lead institutions to redesignate staff as teaching-only. Such an outcome would be counter to the spirit of the reforms, which are intended not to separate teaching and research but to more fully reflect their integration within Higher Education. This is particularly significant in the Humanities where teaching and research are intimately linked, and where at present the use of teaching-only or research-only contracts is rare. The Stern proposals offer an opportunity to develop this integration, but the proposal to specify a minimum of one output, as currently formulated, may put pressure in the opposite direction, as institutions may be more tempted then to attempt to revise staff contracts.

There is an alternative statistical model that might be considered: this would require submissions to include outputs from a reasonable proportion of staff in a unit. Such a model might need to vary according to the total size of the unit, as with the formula for impact case studies in REF2014.

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?

No, the gestation period of the long-form research outputs such as monographs, critical scholarly editions, major data bases, corpus work, etc. which are the bedrock of research excellence in many Arts and Humanities disciplines, means that using date of acceptance (itself a vague concept, hard-to-define with legal accuracy) as the point of census is likely to give rise to multiple challenges and complications – as is the recommendation that outputs be shared between (sometimes multiple) employing HEIs.

At the very least we would like more guidance on what constitutes point of acceptance, since this can vary significantly. Might point of acceptance be defined differently according to type of output: article versus monograph or multi-volume edition, film etc.? Some outputs (for instance exhibitions, performances etc.) do not have publication dates. Non-portability would also need to be thought through carefully in the case of multi-researcher projects, especially if some contributors are from overseas. It would be an unfortunate unintended consequence if delays or uncertainty over contracting or submitting a piece of work motivated by the REF rules led to the inhibition of interdisciplinary or international research projects.

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

N/A

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

Non-portability would have a negative impact on the subject community, and on academics at all stages of career, from ECR to late career researchers. We understand the general principle, and why it has been proposed: non-portability would ensure the work of senior scholars is returned by the HEIs that funded that research. However, this benefit has to be set against the many downsides. These include: (1) the complexity of managing portability since there would need to be exemptions for particular groups, most notably ECRs, and for kinds of output (see our response to question 10a); (2) non-portability would lead to stagnation in disciplines and departments. Mobility at all levels is essential for the health of disciplines and departments. Mobility of ECRs is an important criterion for international funding schemes: ERC, France, Norway, Denmark. Non-portability discourages the ambitions of individuals and the need of units to nurture them. Finally, there is also the question of at what point in the REF cycle would non-portability apply? It could not be retrospective, as institutions and individuals have both acted in good faith, in the belief that outputs are portable.

For all of these reasons we argue that portability should be permitted, but we propose one emendation, that there should be a cut-off date within 12, even 24 months, of the census. Without this caveat poaching will continue to happen to the detriment of departments that have invested in a long-term strategy for research.

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

In principle this seems a good idea, but in practice we foresee difficulties in establishing the need for and extent of the share in the case of long-form publications in Arts and Humanities subject areas, where the time between contract issue and eventual publication can be up to a decade in some cases, and any individual may have moved several times in that period, often across national borders. The proposal is thus likely to increase the administrative burden and friction of the process.

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:

It is as good as anything else. The case for the exceptional benefits of using this system have yet to be convincingly made.

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

As noted above, a clearer definition would be helpful.

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

We agree with the 0.2 FTE minimum.

Fractional contracts are well-used in our discipline for legitimate reasons (for instance with Creative Writers).

We agree also with the requirement of a short statement outlining the connection of such staff to the submitting unit.

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

Comments:

Emphatically yes.

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

Interdisciplinarity is a process not a field of research. The idea that a single champion or a single interdisciplinary assessment panel can assess and promote interdisciplinarity is thus mistaken. Rather, steps must be taken to embed an alertness and receptiveness to interdisciplinarity across the process. In REF2008 and REF2014 sub-panels usefully divided responsibility for cross-panel coordination to a range of (sub-)panel members. In English Literature, for example, different members worked with different language areas, with psychology, linguistics, history, sociology, etc. Expecting a single champion to have the expertise and skills to deal with the gamut of interdisciplinary activity, and to be able to interact from a position of knowledge with sub-panels working in fields from the medical humanities to Anglo-Chinese poetry would be impractical. We suggest instead that panels appoint some members with a proven record of interdisciplinary working. Cross-referral remains necessary, and should remain part of REF2021, although it needs to be managed cross-referrals between sub-panels so that the workload is not significant for any single panel.

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?

Yes

Comments:

We applaud the fact that peer review remains the primary approach to assessment and agree that the use of appropriate metrics should be determined at sub-panel level. We would be concerned were there to be any attempt to standardise practice in the field of metrics, such as field-weighted citation impact. Such a move would not be welcomed by those we represent. It would reduce the confidence of the sector in the rigour and value of the exercise.

Page 8: Impact

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

Yes

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

The broadening of the definition of impact is to be welcomed, although it would require clear guidelines regarding the nature and scope of the changes to be issued early in the process. We especially value the broadening of the definition to include academic impact on teaching. We recommend clear guidance be given on the scope and nature of the ways that both will be assessed. Alongside our colleagues in NAWA, we also want to see the broadening of impact to include public engagement, including media work, and even innovative ways of disseminating impact, important to the performativity of writing and publishing.

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?

It was noted by members of the sub-panel for REF2014 that the current definitions worked effectively. In the interests of clarity and of continuity with the previous exercise we would strongly recommend that these criteria are retained for REF2021. (However, one proposal came forward from the subject community, that 'reach' should be replaced by 'depth'.)

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

Further clear guidance on the grey-areas between public engagement, outreach, knowledge-exchange, and knowledge co-creation as far as they relate to the REF impact agenda would be very welcome and necessary. This needs to come early in the process. Of particular use would be a digest of high-scoring 2014 impacts and indications of forms of evidence that were judged to be convincing or unconvincing in REF 2014.

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

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

Comments:

Yes, although guidance should be provided to ensure this section, if included, doesn't simply become a repository for institutional jargon about environment, but an evidence-based statement of institutional support.

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?

We agree with Lord Stern that there should not be significantly more case studies in REF 2021 than were required in REF 2014. However, we do not believe that HESA data are a good proxy for research activity. For the purposes of assessing requisite impact case study numbers HESA data may serve, but if it is used, some appeal process should be available for units whose research activity (and hence numbers of case studies required) may be inflated by the use of HESA data.

A loosening of the rigid numerical relationship between staff and case studies would be welcome, especially in the case of small units. If institutional level case studies are to be submitted, this should lead to a reduction in the number required from individual UoAs. Again this requires early guidance.

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

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

Such information – for instance, name of research funder - would be likely to prejudice judgements of the quality of the impact. If such information is sought because it will be useful after the end of the exercise, than it should be gathered in a form which does not go to the panels. That kind of process happens all the time (for instance, with equal ops forms on job applications, which do not go to appointing panels). So if further optional fields, such as funding bodies, are required on a template which is to go to the panel, people will draw their own conclusions, and assume that impact will score better if it derives from (say) RCUK-funded research. That will have all sorts of knock-on effects for what case studies get nurtured in future and what don't.

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?

We would welcome the inclusion of impact arising from research activity and bodies of work and agree that this would generate a far richer picture of the interface of academic research and the outside world.

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

No

Comments:

All impact case studies, whether new or continuing, should stem from underpinning research conducted over the same period (i.e. 1 Jan 1993 onwards), This is especially important given that this consultation proposes the acceptance of new kinds of impact (academic, teaching, etc) which were not allowable last time. We need to leave the door open to things that were excluded last time but which have ongoing impact now. Also, arguing for this longer (and consistent) period would help smaller depts. to put in more case studies so as to avoid the problem of lack of anonymity (in question 26).

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?

This proposal is too ambiguous. The threshold criteria of the equivalent of 2* seemed to work well in REF2014. It used criteria that sub-panel members were familiar with and allowed threshold decisions to be made quickly and with broad consensus across sub-panels. The idea that rigour can be readily disambiguated from the other criteria of significance and originality in the assessment of research quality, and that it would be useful to attempt to do so in order to assess the impact of such research seems at best fraught with difficulties, at worst bizarre. Is the assumption that research conducted with great rigour but with little or no significance or originality is the best foundation for impact? This seems both counter-intuitive and self-defeating. A better case might be made for either originality or significance as the best indicators of the likely scope and significance of impact. But from the perspectives of both intellectual coherence and practical utility, it seems wiser (and least burdensome in terms of the work of subpanels) to retain the methodology tried and trusted in REF2014.

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

If evidence is gathered it makes sense to have it available for sub-panels to assess. The process used in REF2014, where supporting evidence (statements from partner organisations, data-sets, etc.) referred to in supporting statements had to be requested from HEIs on an individual basis if sub-panels wished to audit claims was cumbersome, time-consuming, and created additional burdens on both staff in the HEIs and REF support staff.

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

We welcome the development of guidelines on the use of quantitative data, but note the concern raised in the Consultation that this could 'signal a hierarchy of evidence'. Impact is, by definition, various and non-standard, and even within categories of data different significance attaches to that data on a case by case basis. Guidelines are welcome, but not standardisation of data.

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?

Case studies submitted in REF2014 that are still producing demonstrable new impact should be submittable in REF2021 as part of a balanced portfolio of case studies. It would be artificial either to bar the assessment of genuine impact created by research in the period or to insist that such case studies need to be very different from the REF2014 submission. (i.e., if a prison writing project is still proving beneficial to prisoners or ex-offenders in 2021, the project should be submittable and should not be required to artificially expand its scope (by adding other prisons, schools, etc.) in order to qualify for submission). As with REF in general, the principle should be to capture and assess the range and quality of activity in the field of impact, not to distort behaviour.

An extra section within the template should be provided to allow a summary of earlier impacts and evidence in order clearly to distinguish subsequent 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?

No

Comments:

The use and value of quantitative data should be determined at sub-panel level in order to reflect the needs and practices of the disciplines concerned, with the exception of E&D related data, which should be required of all.

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

Relevant data relating to a rich research environment in English might include the extent of research leave provision, its regularity, and the terms on which it is applied for and granted, access to individual research funds, library spend in the discipline, and the use of workload models, postgraduate and early career support. Indicators related to E&D might include a unit's participation in Athena SWAN and/or invitations specifically to note instances of good practice (such as augmented research support for maternity returners, full replacements for maternity/ adoption leaves, for example).

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?

This might be captured via non-HEI partnerships supported by HEI or UoA.

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

No

Comments:

Emphatically not. If open-access is to be rewarded, clear guidelines and criteria need to be set out to describe how this will be assessed, by what criteria, how it will be rewarded, and why it is beneficial. Vague statements about 'additional reward' for UoAs going beyond the requirements for this activity are entirely outside the spirit and letter of the REF assessment process, which needs to be clear, open, and transparent in its terms. The process has so far not felt the need to add that units submitting more outputs than the rules allow, or more staff, might be rewarded in some unstated way, so it seems remarkable that the suggestion has even been entertained for open access. Open access information as built into the rules will make institutions act differently from one another, and it would favour Universities that were able to pay for gold open access.

Page 10: Institutional level assessment

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

This proposal has the potential to divert institutional support and strategy into manufacturing cross-disciplinary case studies. How this would be assessed – on institutional strategy? Outputs? Investment?

The proposal that grades for institutional-level impact and environment assessments could be included as a percentage (of up to 12.5%) in the individual UOA-level profiles may well have a problematic outcome in terms of the assessment of individual disciplines and, in particular, of departments doing excellent work within institutions that may not do so well at an institutional-level. This would, first, serve to undermine the discipline-specific judgement that individual UoA panels have traditionally sought to provide, since a very strong English Department with a high level of 4* work in its own discipline may find itself with a lower overall profile in English than another Department with less 4* work because the latter sits within an HEI with a stronger overall profile. Second, given the likely ways in which institutional-level environment, in particular, would be assessed, there is a strong possibility that this will lead to even more domination of the REF assessment by science-heavy institutions with large incomes in medical research, etc., to the detriment of institutions (and departments within those institutions) more focused on the Arts and Humanities. Should the individual profiles for English submissions each be skewed by 12.5% derived from institution-level assessment, this will reduce the specific disciplinary value accorded to our subject area. For this reason, we strongly oppose the suggestion that institutional-level assessment be included as a percentage within individual UoA-level profiles.

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

Any pilot must include an account of the resultant administrative burden of such a scheme.

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?

We favour the alternative proposal outlined at 128: where 'either or both of the elements of the institutional-level assessment out of the overall quality profile be considered separately'.

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?

Yes

Comments:

We agree that output weighting should remain at 65%. Overall weighting for impact should remain at 20% to ensure comparability with REF 2014.

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:

The allocation of 5% of the total return to institutional case studies seems very high given the untested nature of this aspect. We recommend that the institutional impact percentage be reduced, perhaps to 2.5%. We would suggest that the environment total is split 5% institutional and 10% UoA, to avoid giving too much weighting to a new aspect of REF.

Page 12: Proposed timetable for REF 2021

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

2018 is very late for publishing the guidance on submissions. Key decisions, such as portability/ non-portability, and minimum numbers of outputs need to be published as soon as possible.

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?

We were disappointed to see no mention of the extension of double weighting to include triple weighting in cases of exceptional scale and scope. A triple-weighted category of work would account not only for those long-term multidisciplinary projects found in many STEM subjects, but also for major archival projects, databases, multi-volume editing projects and varieties of linguistic corpus characteristic of the Arts and Humanities'.

If 'user' assessors are to be used again, HEFCE should consider paying its impact user assessors. This would improve the diversity and spread of user assessors. Owing to the challenges of freeing staff from their commitments in smaller, less wealthy, often regionally based organisations, user members on the English sub-panel in REF2014 tended to be drawn exclusively from those larger, better established organisations (often metropolitan-based) that could afford to spare key staff members for extended periods of time. This led to an unrepresentative sample of organisations and user communities, both geographically and in terms of user type.

We would also note that not much is said in the consultation document about the international quality and impact of research. Nor is there any comment on the support for, contribution and impact of PGRs and ECRs on institutional and UoA research environments.

We are concerned about the removal of equality provisions in the REF. We are very concerned over the probable consequences for colleagues with caring responsibilities, disabilities, or young women, who will clearly be disadvantaged by the removal of any maternity provision (both directly in the REF and indirectly in terms of hiring practices). In particular, some proposals threaten to embed a system of privilege: once a researcher falls behind, they will always be kept behind. This is very likely to lead to the systematic disadvantage of young women, particularly those who have children. There is a risk at present that instead of developing a diversity agenda for colleagues from other protected groups, we may lose what little ground had been gained over recent decades in terms of gender equality.

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Q56. If you would be happy to be contacted in the event of any follow-up questions, please provide a contact email address.

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