



**Professor Stephanie Haywood**

**President**

**T: 01482 466937/6341**

**E: s.k.haywood@hull.ac.uk**

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**HEFCE**

**Consultation on the Second Research Excellence Framework**

**Submission on behalf of the Engineering Professors' Council**

## Overall approach

### 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?

Continuity of approach with REF 2014 is welcomed. To reduce the burden on institutions and the sector as a whole, we would welcome as much continuity with REF2014 as possible. It is commendable that there are no major new initiatives outlined in this consultation, aside from those that have been recommended in the Stern Review. There is nevertheless a danger that the combined consequences of several small changes proposed in Stern will actually result in significant changes compared to REF2014 and hence an unintended increase in the burden of time and cost. It is important to bear this in mind when considering potential changes. We have tried to highlight where this increase may occur.

We especially welcome the recommendation that, as with REF 2014, the assessments will be undertaken by expert panels using peer review. The use of limited metrics is acceptable, but they should be used only by panels that would find their use appropriate and they should not replace or take precedence over expert peer review.

## Unit of assessment structure

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

It is important that universities can select the UoAs to which they submit their staff. The approach of assigning staff according to Academic Cost Centres (ACCs) designed and used for teaching is unsatisfactory and they align poorly with engineering research disciplines. Research in engineering often spans teaching units and can be inherently cross-disciplinary.

Other related issues are: smaller departments are less specialised and usually submit their staff under “general engineering”; some universities (such as Cambridge) have unified engineering departments; some research units don't fit into just a single specialism.

The Units of Assessment used in REF2014 were sensible and we would welcome the consistency between exercises. This would allow more straightforward comparisons to be made between institutions and for institutions' internal purposes. It would also avoid unnecessary burden in effecting the changes.

A General Engineering UoA is essential to enable smaller units to submit their work in a coherent manner and to enable the assessment of interdisciplinary research in a meaningful way. Conversely, a single engineering unit of assessment incorporating all disciplines would be too large to function and would necessarily be broken into smaller units based on the specialisations of the assessors anyway.

## Expert panels

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

Yes.

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

Yes. However, it is important to guarantee that a clear schedule is provided in advance.

Appointing a deputy chair early on would be useful in case of the unexpected unavailability of the chair (which, in the absence of the sub-panel at the start of the process, would have serious consequences) and the potential to share workload. It is important to give panel members as much notice as possible for what constitutes a major demand on their time.

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

Yes. However, criteria for nominating bodies need to be clearer, as well as for what bodies are allowed to nominate.

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

Overall, increasing the number and type of nominating bodies would increase diversity.

It should be guaranteed that panel members are not allowed to judge any submissions from their own HEI.

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

The proposal sounds too complicated and would increase the burden of work when E&D data is already available nationally for HEIs. An approach to provide comparable E&D, by non HEIs, would have to be developed. It would also deter smaller nomination bodies, which would in itself narrow diversity.

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

No further comments.

## **Staff**

**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?**

The EPC does not support the proposal.

The HESA ACCs are primarily focused on the structure for teaching and not research. Many of these have been developed based on national structures for education pre-University as reflected in JACS codings.

The existing UoA structure has in many institutions helped develop a healthy regard for cross-disciplinary research strategies and groupings.

In many subjects in many institutions the conflation of the UoA with ACC will drive a silo culture. It will lead to significant restructuring of ACCs and staff mappings. Potentially it could drive closures of ACCs which have strong teaching but weak research thereby negatively impacting taught provision. It will reduce the ability of institutions to create distinctive research structures and strategies whilst maintaining support for individual disciplinary areas recognised by Professional bodies.

The existing approach of permitting universities to choose which UoA to submit to is not burdensome at an institutional level and would be compatible with a full submission of all staff with independent research as part of their contract. Universities should be able to manage this efficiently.

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

First, there needs to be a very clear definition of "measure of independence". Research assistants (RA) should not be included, as they are not independent researchers. Individual funding, as a measure of independence, could be used. However, a level of own funding needs to be decided as minimum requirement to be considered an independent researcher. If RA staff are submitted they should not then be countable in postgraduate research staff numbers but they must be a divisor in the per capita income, for example. For simplicity, the EPC would favour not including RAs and keeping this the same as for REF 2014.

Second, this definition should work across all fields and disciplines and we are aware that funding levels could be different in different research areas.

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

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

The EPC is very supportive of the idea that REF2014 assessed quality at a defined volume of outputs.

This is critical for work-life balance, the Athena SWAN agenda and ensuring staff attitudes to teaching and research are balanced.

In continuity terms it seems reasonable to fix the overall sampling volume of outputs at the same level as REF2014.

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

Clarity is needed on the number. One could allocate 2 primary outputs per individual (the average submission) and a contribution statement for others or some variation on this theme. Contribution statements were used in some sub-panels of panel A.

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

The EPC supports Lord Stern's recommendation. If all staff are to be submitted then zero outputs must surely be allowed, especially if non-portability is introduced. Otherwise, staff moving institutions to an institution with a good research track record but who fail to publish immediately will be impacted most heavily, as well as early career researchers and possibly women taking maternity leave.

In addition, in some disciplines staff struggle to have 4 outputs (e.g. artefacts and patents as outputs, and not necessarily research publications).

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

**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?**

The proposals are not very helpful. Portability should be maintained, preferably fully, but at least to some extent or we will have a strong disincentive to recruiting staff who will see themselves as chattels to their current institution.

The issue is not only about the non-lab subjects and non-journal outputs. Moving institutions is a natural step in the career development for many researchers. However, it is difficult and often involves re-establishing labs and structures over the initial period of time. It is important that this period is not viewed as a fallow period in its contribution to research.

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

The engineering sector would face many challenges.

In journal-based subjects, if a publication address is not seen as sufficient then how would one reconcile all the different arguments staff would make?

In lab-based subjects, the path from an initial grant idea to funding, developing the experiments and a high-profile output, is many years.

In portfolio and book-based subjects, outputs would clearly be argued as having been developed over many years. We could find it impossible to recruit for a period of two years prior to a REF in engineering, an area in which recruitment is already difficult.

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

Yes. It would have a negative impact on both people and institutions. It would affect early career researchers and would disadvantage diversity by creating extra barriers to their career progression and generating significant work-life imbalances. It would also have a negative impact on the ability to recruit, to bring back talent to the UK

and to avoid brain drain, which would not support the Government's Industrial Strategy. At an institution level, new departments/units would not be able to submit.

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

It is unclear how this would work. Giving the example of patents and artefacts – that are usually HEIs' intellectual property and not the individual's – who would own what? Further consideration would need to be given to developing a fair and workable approach to proportional sharing.

**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?**

Having ORCID as a mandatory requirement would not be practical, as it could potentially generate opposition to REF as institutions would need to make ORCID registration a mandatory contractual requirement.

This might pose some legal issues and trade union opposition as it might result in some staff contracts being shifted to teaching only.

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

Category C staff might include Emeritus Professors that still contribute to the research impact of their institutions. However, at least for the engineering disciplines, this is not a common situation, and no negative impact would be expected within the engineering discipline with the removal of this category.

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

There needs to be a clear definition. Usually, a research assistant is employed on a temporary contract and is not an independent researcher. However, a research assistant might be educated at a degree level or postgraduate level (postgraduate research assistant - PDRA). But the issue is related to question 8, whether an individual is independent during their time employed at the institution (the nature of their contract). For example, someone who had held a 3-month Fellowship after a PhD but then became a PDRA employed on a grant, would have first become independent via the Fellowship.

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

An audit or investigative review would be needed on certain cases when there is a suspicion that people are being strategically and temporarily contracted with the sole purpose of using portable outputs to submit to REF. In these cases, evidence should be provided to support claims about where the research work was done. Any limit on fractional contracts risks short contracts being offered around the census date. The EPC recommends leaving the 0.2 threshold but that HEFCE will adopt a rigorous process to audit examples where panel members are concerned about the affiliation and/or contribution of individual staff members.

## **Collaboration**

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

This might be useful for the wider engineering sector. It is important to have this flexible collaboration in engineering, so any revisions to staff inclusion must not penalise collaboration with external organisations, but equally must ensure that work from external organisations is not then counted as coming from an academic institution.

## Outputs

**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?**

No, as it would increase both the complexity of the process and the burden of panellists.

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

Well-chosen panels are key to the assessment of interdisciplinary research. The real issues are whether panels believe they are making judgments in outputs that move their subject forwards, or on a more abstract assessment of the excellence of research, and the balance of cross-disciplinary expertise in sub-panels. Some cross-representation of sub-panels which have obvious disciplinary boundaries would be best.

General engineering in REF2014 looked at a lot of interdisciplinary research, particularly in the fields of medicine and the environment. There were 'interdisciplinary panel members' in the sense that experts in these fields were included. The institutional case study should be the place for interdisciplinarity to be formally included.

**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?**

The three criteria of originality, rigour and significance seem balanced. We need to keep this as a peer review of the quality of the output.

## Impact

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

Yes.

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

The EPC agrees.

**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.

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

Further clarification would be helpful.

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

Previous guidance was adequate.

**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. However, it would be useful to have a clear definition of what is portability of outputs and what is portability of impacts.

**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. The separation of the impact statements from the environment was unhelpful. It risked good statements in the wrong part of a submission being missed in the assessment process.

**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?**

The impact needs to be new and different. (Please see answer to question 33)

**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.

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

It would be useful to have a free text field to add more information.

**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?**

This needs to be tangible and realistic within the timeframe. There must be direct exploitation and impact as a consequence of specific novel elements of research. These novel features are reported in specific outputs, so no change is required.

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

No. The timeframe should provide continuity from the last REF, with no gaps and overlaps, following the previous submission dates for REF 2014 (page 5, <http://www.ref.ac.uk/media/ref/content/pub/assessmentframeworkandguidanceonsubmissions/GOS%20including%20addendum.pdf>)

**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?**

The criterion seems sensible.

**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:**

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

Audit evidence is vital and needs to be improved and made available to panels.

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

It would be helpful.

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

No.

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

It seems sensible to flag resubmission case studies. We should not allow submissions to rest on previous case studies alone and so there does need to be a requirement for new ones.

## **Environment**

**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?**

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

**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 requires more clarification.

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

No. This is politically motivated and not needed to achieve the aims. Simply requiring outputs to be open access without yet knowing which will be submitted alongside the widespread development of Institutional Repositories is already changing this world more rapidly than REF cycles. Many Open Access journals are too young to act as reliable and trustworthy sources for long-term archives.

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

Further clarification would be helpful.

## **Institutional level assessment**

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

The EPC supports this change.

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

No further comments.

## **Outcomes and weighting**

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

Any institutional assessment should not be conflated with UoA profiles, but should be shown separately for the institution. This would allow the matters within the control of UoAs to be seen, would allow a granular understanding of quality in an institution to be seen and would provide QR funding algorithm options.

**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.

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

No, the institutional-level should be kept separate.

## **Proposed timetable for REF 2021**

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

The timeframe should provide continuity (see answer to question 30).

## **Other**

**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?**

