

## Annex A

### Consultation questions and response form

1. Responses to the consultation should be made by completing the form below, and returning it by e-mail by **midday on Wednesday 16 December 2009**.
2. All responses should be e-mailed to [ref@hefce.ac.uk](mailto:ref@hefce.ac.uk). **In addition:**
  - a. Responses from institutions in Scotland should be **copied to** Pauline Jones, Scottish Funding Council, e-mail [pjones@sfc.ac.uk](mailto:pjones@sfc.ac.uk).
  - b. Responses from institutions in Wales should be **copied to** Linda Tiller, Higher Education Funding Council for Wales, e-mail [linda.tiller@hefcw.ac.uk](mailto:linda.tiller@hefcw.ac.uk).
  - c. Responses from institutions in Northern Ireland should be **copied to** the Department for Employment and Learning, e-mail [research.branch@delni.gov.uk](mailto:research.branch@delni.gov.uk).
3. We will publish an analysis of responses to the consultation. Additionally, all responses may be disclosed on request, under the terms of the Freedom of Information Act. The Act gives a public right of access to any information held by a public authority, in this case HEFCE. This includes information provided in response to a consultation. We have a responsibility to decide whether any responses, including information about your identity, should be made public or treated as confidential. We can refuse to disclose information only in exceptional circumstances. This means responses to this consultation are unlikely to be treated as confidential except in very particular circumstances. Further information about the Act is available at [www.informationcommissioner.gov.uk](http://www.informationcommissioner.gov.uk). Equivalent legislation exists in Scotland.

### Respondent's details

<b>Are you responding:</b> (Delete one)	On behalf of an organisation
<b>Name of responding organisation/individual</b>	Council of UK Heads and Professors of Sociology
<b>Type of organisation</b> (Delete those that are not applicable)	Academic association or learned society
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### Consultation questions

(Boxes for responses can be expanded to the desired length.)

**Consultation question 1: Do you agree with the proposed key features of the REF? If not, explain why.**

In the view of the Council of UK Heads and Professors of Sociology, there is a risk of serious blurring of the different objectives of the REF. For example, Para 26 states that, "An excellent submitted unit will be expected to demonstrate the following key characteristics of excellence: Production of a portfolio of high-quality, original and rigorous research, including work which is world-leading in moving the discipline forward, innovative work pursuing new lines of enquiry, and activity effectively building on this to achieve impact beyond the discipline, benefiting the economy or society." This implies that the same items of output might reasonably be expected to deliver against all criteria, from impact to intellectual originality and rigour. While we agree that original and rigorous research should be the focus of inquiry, we do not believe that all such research will necessarily demonstrate direct impact. Outputs that demonstrate originality and rigour may require intervening forms of mediation before there is demonstrable impact. Equally, outputs that demonstrate high impact need not necessarily demonstrate originality and rigour, although we believe that establishing originality and rigour in research should be primary concern of the exercise.

Indeed, given the public nature of research, the application of research may be undertaken by researchers other than those who originate it. Paragraph 27b states that, "An assessment of demonstrable economic and social impacts that have been achieved through activity within the submitted unit that builds on excellent research. This purports to assess the extent to which a submitted unit has built upon its strong record of excellent research to make a positive impact on the economy and society within the assessment period." However, the nature of research is such that UofAs other than those that originate research ideas may be responsible for its application. In this context the 'ownership' of research impact by the originator of ideas or by specific UofAs may be difficult to specify and separate out in terms of its various contributions. This is especially so in the social sciences where ESRC's discussions of social science policy differentiate between 'exporter' (economics, political science, anthropology and sociology) and 'importer' (eg education, business studies, social policy, development studies etc) subject areas, where the latter are 'applied' areas to which concepts and research capacity from core subjects are exported. This is implicitly recognised in the way in which 'impact' upon the academic community is identified as a potential form of impact, but excluded from the impact criteria at Paragraph 53b. In this way the model favours 'importer' subjects despite the implication of the distinction between importer and exporter subjects being that importer subjects are weaker in terms of originality and rigour. There is a mediated form of impact by exporter subjects that will be missed in the proposed methodology.

We believe that the interpretation of 'time lags' in impact will have a conservative consequence. The REF seeks to "Support and encourage innovative and curiosity-driven research, including new approaches, new fields and interdisciplinary work." (para 15b), but new fields will not be able to demonstrate impact, and, to the extent that a UofA enters a new field then it will diminish its capacity to demonstrate impact (also given the

way in which impact will be calibrated against FTEs). The emphasis upon impact will potentially have a negative consequence as far as the appointment of early career staff is concerned. Although the definition of areas in which impact can be demonstrated is broad, the tendency will be to favour economic and policy impacts. As will be suggested below, this is evident in the measures proposed (research income from user groups, for example). It will potentially encourage risk-averse behaviours by Research Deans to encourage faculty to concentrate on activities with more easily measured impacts to the neglect of 'innovative and curiosity-driven research'.

In short, we believe that the model of research and its impact being proposed is too simple to capture its dynamics in the social sciences (and probably in other subject areas, too) and that there are potentially serious unintended consequences to its introduction.

**Consultation question 2:** What comments do you have on the proposed approach to assessing outputs? If you disagree with any of these proposals please explain why.

Comments are especially welcomed on the following proposals:

- that institutions should select research staff and outputs to be assessed

This principle seems to be well-established, though it would be advantageous to counteract the effect of selectivity on the rank orders that are inevitably produced by requiring institutions to publish overall data on selectivity and give some minimum disaggregation, perhaps to the levels of the proposed four overarching Panels. We note later that selectivity is often an issue where teaching-only staff are identified. Some staff mobility from public and private sectors is designed to provide practitioner-based teaching (associated with 'importer' subjects) and is not research-driven. We believe that there is a risk that some of the indicators for impact imply that staff mobility is an indication of research impact, but this is not necessarily the case.

- for the categories of staff eligible for selection, and how they are defined

The greater care over the definition of what were previously termed Category C staff is welcomed, though there is possible conflict with the wish to encourage mobility between user communities and academic positions. We also believe that it is important that the continued research role of emeritus staff is recognised. Fractional overseas-based staff should not be included as it is difficult for Panels to judge their contribution.

- for encouraging institutions to submit – and for assessing – all types of high-quality research outputs including applied and translational research

As indicated, there is a problem with applied and translational research needing to demonstrate rigour and originality and, with rigorous and original outputs to demonstrate impact. Given the 'time lags' allowed to affect impact, it is inappropriate to expect outputs to demonstrate impact during the REF period (speculation about possible impact is just that, speculation), while it is equally problematic to assume that the outputs that demonstrate impact are the ones to show originality and rigour (which is not to say that there are no standards of rigour in applied work). In other words,

research might produced different outputs with different audiences. We have already noted our concern about the blurring of criteria in response to Question 1. We strongly emphasise that the focus of the exercise should be research quality.

- for the use of citation information to inform the review of outputs in appropriate UOAs (including the range of appropriate UOAs, the type of citation information that should be provided to panels as outlined in Annex C, and the flexibility panels should have in using the information)

We are happy with the way in which citation data will be only used in conjunction with peer-review and that the latter will be the key driver of output scores. We believe that there are particular problems in the use of bibliometric data in the social sciences and are happy that there is no mandated way in which Panels should use such data.

and on the following options:

- whether there should be a maximum of three or four outputs submitted per researcher

We endorse the reduction of four items to three in order to reduce the burden on Panels. We also believe it to be appropriate in the light of the continued uncertainties over the form of the forthcoming REF, especially with regard to impact criteria.

- whether certain types of output should be 'double weighted' and if so, how these could be defined.

We endorse the double-weighting of monographs, but believe that this should be a standardised requirement specific to Panels and not discretionary for submitters.

**Consultation question 3: What comments do you have on the proposed approach to assessing impact? If you disagree with any of these proposals please explain why.**

We believe that impact is a more robust category than esteem and that it should replace it. However, we believe that there are a number of very serious unresolved issues about its definition and measurement about which we have serious concerns. As indicated in our answer to question 1 we have serious concerns about how these issues are affected by the peculiar character of the organisation of the social science subjects as 'importer' and 'exporter' subjects. Given the continued uncertainty over the criteria by which impact should be assessed we recommend reducing its weighting in the overall profiles.

Comments are especially welcomed on the following:

- how we propose to address the key challenges of time lags and attribution

We agree that there are significant time lags in the development of impact. The problems are several and severe. The first is that the process is frequently non-linear in the sense that it does not only involve the unfolding of an idea, but its conjunction with other ideas separately produced and giving rise to new possibilities. This also suggests a public character to the process, in the way in which published research influences others also to develop impact and unexpected uses for research. To what extent, then, is an 'extension' of a research idea to be attributed to the 'originator' where there are many who are influenced by it and take it further in directions not initially anticipated. There seems to be an expectation that the application of research ought to be delivered by the individual researcher, or the unit in which the individual is based. Each is possible, but so

too is its independent development by others. The model implied by the consultation document is that of 'big science', but other areas of research are much less tightly-coupled. We are also concerned that the implication of attribution is that while outputs belong to an individual, impact belongs to the unit of assessment is inappropriate in many cases where individuals move and, therefore, impact can 'split' between the unit in which the individual was previously a member and that to which the individual has subsequently become attached. As argued in response to Question 1 we believe that the way time lags are addressed will potentially have conservative consequences by rewarding established units, while recognising the attribution of research to individuals (rather than units), as we believe to be appropriate, raises the spectre of institutions 'buying in' impact. This also leads us to suggest that the weighting of impact is too high and encourages such 'game-playing'.

- the type of evidence to be submitted, in the form of case studies and an impact statement supported by indicators (including comments on the initial template for case studies and menu of indicators at Annex D)

The model here clearly shows a 'silo effect', where impact is to be demonstrated essentially through continuity within the UofA and by the 'effort' of staff producing research in a unit to exploit any findings. As stated, this seems to reveal a poor understanding of the more diffuse nature of networks of research, innovation and application.

The emphasis upon a metric of income from users, eg business, government grants, and medical charities, neglects the extent to which Research Council income is also associated with the 'user agenda' and also introduces double-counting of some research income which will also appear as a research environment metric.

There is also the issue that research funded by users does not necessarily produce research that is original in RAE terms, but, given that this 'metric' will be separated from the assessment of specific outputs, this will not be evident in the consideration of impact (which is supposed to be organised around the idea of 'research excellence' with 'impact'). For example, some forms of consultancy represent the mobilisation of current knowledge in a field, rather than the production of new knowledge. Indeed, many of the suggested indicators are mundane and do not show '*impact*', but *engagement* (ie that a particular user group has been cultivated or provided funding).

In contrast, the indicators for 'cultural enrichment' and 'improved welfare and social cohesion' are diffuse and unlikely to be demonstrable effects of a particular piece of work. For example, reference is made to 'measures of improved social equity, inclusion or cohesion (for example, improved educational attainment among disadvantaged groups ..', but these outcomes would be likely to be contested, and, if demonstrable, attributable to government policy deriving from a range of research contributions. Similarly, 'increased levels of public engagement with science research (for example, as measured through surveys)', implies that UofAs will conduct their own impact evaluation research, or the surveys will not be able to demonstrate that the impact will be associated with specific research contributions.

There is a remaining issue that the time lag for citations to come into effect is not fully appreciated (Paragraphs 45b and 45e). Exclusion of citation data for outputs in 2012 only recognises part of the problem. Many outputs between 2009-11 will not have been in circulation long enough to build up citations. Also in connection with Paragraph 45e, sampling selection has to be based on random sampling.

- **the criteria for assessing impact and the definition of levels for the impact sub-profile**

Paragraph 27(i) states that assessment will be made against “internationally benchmarked standards”. It is not clear what these standards are, or how they have been arrived at. We are also concerned that research that has impact can meet the highest standard of excellence while having a ‘local’ or ‘regional’ focus. It is also not clear how panels will assess the significance of the ‘transformative’ impact of research without evidence being provided (para 72). Indeed, there are serious ‘political’ issues, too, where impact might seem to depend upon its acceptance by the body for which it is provided – ‘critically relevant’ research may have impact even where it is not acted upon. There is a danger of attributing impact to research which is designed not so much to provide evidence-based policy or practice, but to be research based in policy and practice requirements.

- **the role of research users in assessing impact.**

We believe that it is important that ‘users’ be involved in the assessment of impact, but not of issues of rigour and originality. However, the variety of measures and kinds of impacts will make the identification of appropriate ‘users’ to be represented on the Subject Panels both a difficult issue to determine and one that will have a great deal of significance. We believe that there is a clear risk that users representing particular kinds of impact are likely to be selected, for example in the case of the social sciences those predominantly from the policy field. It is not clear how users will be able to give assessment against international standards. As well as the issue of selecting users from as broad a range of beneficiaries and audiences of research, there is also the serious issue of training them in the operation of the criteria to be used. While we believe that the user representatives should be restricted to making judgements on impact and overall assessment, we believe that the academic members of the Panels should also be involved in the assessment of impact, since it is likely that they will have a broader knowledge across the different fields of research than users, whose knowledge is likely to be more focused in narrow areas of concern.

**Consultation question 4: Do you have any comments on the proposed approach to assessing research environment?**

The issue is not just one of ‘outputs’ and their impact, but also ‘research environment’ and its impact. Sociology has emerged in the last decade or so as a discipline making a major impact in terms of its contribution to research methodologies. A very significant proportion of the activities funded under the ESRC’s Researcher Development Initiative and the National Centre for Research Methods and its ‘nodes’ are conducted by sociologists. Indeed, ESRC has invested strongly in such activities to produce and

disseminate research methodologies (including in the new ESRC Doctoral Training arrangements), yet this will be difficult to represent in the new REF methodology.

We are also concerned that 'user' criteria have entered into the definition of research environment and this involves an inappropriate degree of 'double-counting'.

We support the inclusion of esteem measures (para 79c) in the research environment category.

**Consultation question 5: Do you agree with our proposals for combining and weighting the output, impact and environment sub-profiles? If not please propose an alternative and explain why this is preferable.**

As already indicated, the criterion of 'significance' in the three criteria by which outputs are to be judged – 'rigour, originality, significance' – potentially introduces a non-academic, user criterion into the judgement of outputs. The definitions of outputs imply a redundancy. 4\* outputs are defined as being above the threshold of 'international excellence' (3\*) – they are 'exceptional' by virtue of meeting the 'highest standards'. However, the definition of 4\* also introduces the term 'world leading' as if it were an additional criterion: a 4\* output must be world-leading *and* of the highest standards. While the highest standards of rigour, originality, and significance have been defined, 'world-leading' has not. The conclusion must be that 'world-leading' is a descriptor of research that meets the highest standards; it is not an additional criterion of quality.

There is a serious risk of 'treble counting'. 'Impact' is a factor in the evaluation of outputs (while the outputs being evaluated are different from those cross-referenced in the impact assessment, there is an invitation to propose a putative impact, which will not be demonstrable) and also a factor in research environment. In this way, the %age weighting to impact is greater than the 25% proposed.

The problems in the measurement of impact, as well as its unintended likely conservative consequences, suggest that its weighting is in any case too high; a more reasonable balance might seem to be 60% outputs /25% research environment/ 15% impact. However, given the effort to be undertaken by the Panels in evaluating outputs, **a more reasonable balance might be 70%/ 20%/ 10%.**

The draft definitions of overall excellence given in paragraph 86 are unacceptable. They have no justification within the REFD process. While profiles of outputs, environment, and impact are matters of panel judgement against specific definitions, the overall star levels are merely mathematical products of an arbitrary weighting system. Panels cannot be expected to sign off profiles that will be defined in terms of measures that they have not specifically considered. 4\* excellence should be left simply as 4\* and should not be glossed through the *post hoc* introduction of definitional statements that have not figured in the assessment.

**Consultation question 6: What comments do you have on the panel configuration proposed at Annex E? Where suggesting alternative options for specific UOAs, please provide the reasons for this.**

We believe that all aspects of the REF submission should be assessed by a single subject Panel. However, we are concerned that the 'user members' should be mainly involved in the assessment of impact.

We are strongly in favour of a reconfiguration of Subject Panels to include Sociology with Social Work, Social Policy and Social Administration, rather than with Anthropology. In previous RAEs, a number of significant sociology groupings have submitted together with social policy groupings to the SW, SP and SA Sub-Panel. While the latter would be a much larger Panel, it would not be the largest, even within Panel C, where Business and Management Studies would remain significantly larger, and even a Panel made up of Sociology, Anthropology, Social Work, Social Policy and administration would be smaller. However, we also think it possible for Anthropology to be included with Area Studies and Development Studies and brought under Main Panel C. We believe that a reconfigured Sociology, Social Policy and Social Work Panel In making such a suggestion, there are important subject-specific differences that would need to be considered, as there would be in any merging of what were previously RAE Sub-Panels. A combined panel has to be large enough to cover all specialisms, and in this respect it is no more complex than a single-discipline panel that has to cover quite diverse areas. A large panel, recruited from all areas, would be able to effectively assess all submitted research. We note that this was the case in RAE 2008 for the combined social policy and social work panel itself, as this had to recruit from both constituent areas and had to devise effective means of properly assessing, for example, social work submissions by social work specialists. We see a combined panel as an extension of the practices operated for social policy and social work in the RAE. This issue is of crucial importance because there are so many Departments that combine sociology with social policy, often – if not always – operating as integrated units. Such Departments currently face a difficult choice about which panel to submit to, with all the consequent reliance on discretionary cross-referral. One of the consequences has been a reduction in the number of submissions to the Sociology Sub-Panel across RAE periods. Joint Departments would no longer have the problem of deciding which panel to submit to, but could make a single, integrated submission and rely on the internal panel procedures to ensure a fair assessment. ('Internal' cross-referral would be far more efficient than cross-panel cross-referral, and would ensure that consistent standards are used). Indeed, we also note that while sociological research was also submitted in the last RAE to other Sub-Panels (such as Education and Business Studies, by far the highest proportion of sociologists (as measured by highest degree qualification) outside the Sociology Sub-Panel was submitted to SW, SP & SA (with significantly less than half the number submitted under SW, SP & SA found under Education, which had the next highest proportion of staff from a sociology background).

**Consultation question 7: Do you agree with the proposed approach to ensuring consistency between panels?**

There seems to be good reason to think that the interaction among outputs, research environment and impact, as well as the balance among different kinds of impacts, will vary across the four Main Panels and, thus, that there is no strong case for consistency across Main Panels and that the weighting of the different items could be different. We believe that the involvement of international members should be carefully specified and restricted to an advisory role.

**Consultation question 8:** Do you have any suggested additions or amendments to the list of nominating bodies? (If suggesting additional bodies, please provide their names and addresses and indicate how they are qualified to make nominations.)

No

**Consultation question 9:** Do you agree that our proposed approach will ensure that interdisciplinary research is assessed on an equal footing with other types of research? Are there further measures we should consider to ensure that this is the case and that our approach is well understood?

As noted, we believe that the proposals for impact will potentially have a conservative consequence for new areas of research, including interdisciplinary research. We are also concerned that there is a lack of clarity about what constitutes interdisciplinary research. For example, in the social sciences some Panels will be disciplinary-based, while others will be applied in their focus. The latter also tend to be interdisciplinary. This distinction broadly follows from the distinction between 'exporter' subjects and 'importer' subjects. The latter tend to be favoured in terms of how 'impact' is defined, so the nature of the current proposals is such that there is a potential benefit to some types of (applied) interdisciplinary work over subject-based work and a disadvantage to other kinds of interdisciplinary work not favoured by a separate subject panel.

**Consultation question 10:** Do you agree that our proposals for encouraging and supporting researcher mobility will have a positive effect; and are there other measures that should be taken within the REF to this end?

We have a concern that selectivity by HEIs will mask some of the relations between research and its applications evident in some social science subjects. Anecdotally, it would appear that selectivity is higher in 'importer' subjects than in 'exporter' subjects. To some degree, importer subjects are also characterised by a requirement to employ practitioners for purposes of teaching – this is evident, for example, in business studies, education and social work. This may also be associated with a concern to generate consultancy income and provide seminars and workshops in continuous professional development. The REF Consultation document tends to assume that staff mobility between HEIs and other bodies are *research* driven, rather than being *teaching* driven, or *consultancy* driven (where the outputs do not meet the REF criteria for research outputs)

It is frequently the case that such staff are appointed without PhDs or equivalent. ESRC, for example, has identified weaker research capacity in importer subjects precisely for this reason and established its AIM scheme in Business Studies to address it. The implication is that staff appointed for their practitioner skills are frequently not selected for submission in the RAE/REF. Yet, their activities will potentially be counted in the impact and research environment measures. This is in contrast to esteem and research

environment measures in the previous RAEs which were specifically related to submitted staff.

**Consultation question 11:** Are there any further ways in which we could improve the measures to promote equalities and diversity?

As noted, we have concerns about the consequences of the impact measures for the recruitment of early career staff, which we believe also has implications for equalities policies.

**Consultation question 12:** Do you have any comments about the proposed timetable?

Given the current weightings and the uncertainties over measurement of impact, the proposed timescale for implementation of the RAE does not give sufficient time for consultation on the consequences of the Pilot and the publication of the menu of impact indicators. This suggests that the submission date for the RAE might be pushed back to 2013.

**Consultation question 13:** Are there any further areas in which we could reduce burden, without compromising the robustness of the process?

Council of Heads and Professors of Sociology supports the proposal to reduce the number of outputs per member of staff from four to three as something that would significantly reduce the burden on Panels.

**Consultation question 14:** Do you have any other comments on the proposals?

No further comment, other than to recommend once again that the weightings assigned to impact be significantly reduced. Our recommendation is that it form no more than 10% of the overall assessment.