

## 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>	On behalf of an organisation
<b>Name of responding organisation/individual</b>	British Sociological Association
<b>Type of organisation</b>	Academic association/Learned society
<b>Contact name</b>	Judith Mudd
<b>Position within organisation</b>	Chief Executive
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Founded in 1951, the British Sociological Association (BSA) is the professional organisation for sociologists in the UK, supporting a network of communication to all who are concerned with the

promotion and use of sociology and sociological research. The BSA is both a charity and a company limited by guarantee, its primary objectives being to promote sociology and to provide membership benefits. The association has over 2,200 members. Membership remains open to all who are consider sociology to be part of their intellectual underpinning, in any professional setting, including in non academic settings and members are drawn from a wide range of backgrounds including researchers, teachers, students and practitioners in a variety of fields. There are over 30 specialist study groups which focus on major fields of research within the discipline, like Medical Sociology and Religion, as well as a number of specialist discussion groups, such as the Sociologists Outside Academia Group and the Postgraduate Forum, which bring together people who share common experiences and challenges in their academic and professional lives. Specialist groups within the association communicate via email but the association communicates with its members as a whole via monthly electronic bulletins, its website and a print newsletter which is produced three times a year. The BSA supports a busy programme of sociological conferences and seminars throughout the year – just under fifty events in the calendar year 2009 – including an annual conference attended by around 500 delegates from all around the world. A key activity of the BSA is publishing. The association publishes two wholly-owned, internationally renowned, high-ranking journals - Sociology, Work, Employment and Society – and has recently, with SAGE Publications, launched a new print journal Cultural Sociology which is establishing itself at startling speed. The BSA is also a quarter-partner in a consortium which manages the publication of the well-respected online-only journal Sociological Research Online. An important role for the Association is to represent the interests of members and the discipline in both academic and broader public environments. A media specialist works with the Association to promote the latest sociological research findings via the press. The BSA undertakes regular consultation with its membership on significant issues, for example in respect of the Research Excellence Framework, and with allied organisations, funding and other professional bodies to both keep abreast of and inform the consultation responses that the Association delivers to a variety of organisations on matters of importance to sociology. The Association speaks for the discipline in the UK at major domestic and international events, including at European Sociological Association and International Sociological Association meetings, challenges events which threaten the infrastructure of the discipline, and works directly with government and non-governmental organisation representatives to better understand and influence the lot of sociologists working in the UK.

## Consultation questions

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

The BSA agrees with the main features of the REF document with more detailed responses below. Paragraph 27 (i) refers to judgements of research quality against ‘internationally benchmarked standards’. Although the BSA has supported an ESRC-sponsored International Benchmarking exercise in Sociology, there is no international REF, so it is unclear what evidence the Funding Council will be able to offer Panels to guide their decisions.

**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
- for the categories of staff eligible for selection, and how they are defined
- for encouraging institutions to submit – and for assessing – all types of high-quality research outputs including applied and translational research
- 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)

and on the following options:

- whether there should be a maximum of three or four outputs submitted per researcher
- whether certain types of output should be ‘double weighted’ and if so, how these could be defined.

1. The BSA agrees that an HEI should identify its own staff for inclusion in the REF and outputs to be assessed.

2. Sociology units would wish to see research-active emeritus staff eligible for submission under category C, and units should be permitted to make a claim for the inclusion of such staff. The inclusion of overseas fractional staff is more problematic. The problem arises because of the difficulty of assessing the role played by the institution in the production of outputs. The inclusion of such staff is defensible when making judgments about ‘research environment’.

3. The BSA is in favour of the proposal to reduce the number of outputs from four to three per research active member of staff, and we are in favour of including other sources, such as translations and applied work. The phrase ‘evidence of the research process’ is not clear in the context of sociological research. Research outputs in sociology would normally include explanations of how research conclusions were reached.

4. The BSA agrees with the continued use of the criteria of rigour, originality, and significance, but ‘significance’ must be restricted to academic significance and not be confused with ‘impact’.

5. The BSA is strongly in favour of assessment being undertaken by subject-specialist panels.

6. The BSA, in common with many professional associations and the ESRC, supports the conclusion that bibliometrics cannot be used as a sole indicator when judging the quality of research. We strongly agree with the view that they are particularly problematic in the social sciences, so subject Panels should be able to disregard such measures if they wish. A recognised difficulty with citation measures is the time-lag between publication and citation. Research will need to have been in the public arena for a number of years before it has a chance to be cited; many papers submitted to the REF will have been unpublished at the time the citation databases are consulted and outputs from 2009-2011 will not have been in circulation long enough for the publication of useful citation results.

7. We agree with the proposal that for certain types of output there should be an element of 'double weighting', but this should be at the discretion of the Panel.

**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.

Comments are especially welcomed on the following:

- how we propose to address the key challenges of time lags and attribution
- 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 criteria for assessing impact and the definition of levels for the impact sub-profile
- the role of research users in assessing impact.

1. The BSA agrees that impact should be an element in the REF, but the consultation document places dominant emphasis on economic and policy impacts. It is essential that panels recognise the explicit inclusion of cultural and quality of life impact, even though these may be more difficult to demonstrate and measure objectively. Some of the indicators of impact are actually measuring different degrees of engagement.

2. We welcome the explicit inclusion of impact on teaching.

3. The ESRC acknowledges Sociology as an 'exporter' discipline in which methods, concepts and substantive research findings cross disciplinary boundaries and impact upon the development of cognate disciplines. The terminology of importer/exporter disciplines implies impact across boundaries and the BSA is concerned that this contribution of sociology might be unrecognised. Core sociological ideas and methods make a substantial contribution to sub-fields of the discipline such as medical sociology, criminology, the sociology of organisations, etc. and to fields such as cultural studies. Sociology has made a specific contribution to advanced training in research methodologies and the development of innovative research methods. A large proportion of the work funded under RDI and NCRM are carried out by sociologists and the ESRC has made significant investment in work to produce and disseminate research methodologies. We are concerned that these examples of the broader impact of our discipline will be unrecognised in the REF methodology. There is some indication that this will be recognised, but no detail is given of how this will be operationalised.

4. Mobility of individuals and reorganisation of academic departments over time make it very difficult to attribute impact to particular units now. Paragraph 68 implies a stability and longevity in departments that is unusual. Units of Assessment reporting in 2012 are likely to be very different from those in 2008 or 2001. This approach assumes a rather simple model of research and impact. It assumes that research is carried out as a discrete project at one point in time and its impact is experienced at another discrete point in time. A more adequate model of research is that it is an

ongoing activity that has no discrete 'beginning' or 'end' but evolves serendipitously with changes of direction. Impact is a continuing process of engagement and influence. Also, Departments may have been administratively reorganised and it will be almost impossible to attribute impact of academic work to any particular Department. Thus more than one Sociology Department will have a reasonable claim to the impact of research undertaken when Departmental boundaries differed. It is best for this to be acknowledged and there should be no disadvantage where two or more Departments claim impact for the same research work. It is correct that 'outputs' will travel with the author, but impact must be able to be claimed by more than one institution.

5. It is unreasonable to argue that impact must have become evident during the REF assessment period (paragraph 62). This implies that research carried out in 2001 and which began to have an impact 2006, would be ineligible for consideration. There should be no such limitation. The REF must investigate the impact of research undertaken during the appropriate time period, whenever its impact became evident.

6. With reference to paragraphs 58 and 61 and Annex D, the idea of a case study is unclear. It may be clarified through the pilot study, but this will report too late to be of assistance in the preparation of submissions. There must be very clear guidance on what constitutes a 'case' and how its eligibility is to be established.

7. There are several references to 'users' but there are difficulties in identifying specific 'users' of research to be represented on the Panels. This is particularly acute if the broader definition of impact includes 'quality of life', for example. It is more accurate to refer to users, beneficiaries and audiences. The emphasis in the REF is rightly on international quality research but the list of 'users' to assess impact is very parochial. Will users have the ability to assess international quality impact outside their local field? This reinforces the importance of panels developing their own subject specific notions of impact and list of users (as well reinforcing the reduction of the weighting that falls to impact). Impact should be a judgment made by academic panel members and users, but there is a need to broaden the definition of 'user', which tends to be seen in instrumental policy terms, despite all the emphasis on quality of life and cultural impact. The BSA understands the importance of having representatives of beneficiaries and audiences included if the results are to have any validity – though we also point out that their recruitment will not be easy.

8. We are concerned that the consultation documents makes no mention of the need for 'user' members of Panels to be properly trained. They *must* have some system of training comparable with the training and socialisation of subject panel members. Panels will be expected to operate REF procedures, but users are potentially in a weak position unless they are trained into operating the REF definitions and procedures (whatever they turn out to be).

9. If impact indicators are restricted to a fixed menu, the list needs to be extremely wide. There is a gap in the consultation document as to what the indicators might be in the case of social and cultural impact in particular. Annex D, for example, gives a very restricted list of cultural indicators and no quality of life indicators. We suggest that Departments are allowed to present their own evidence of broader impact.

10. The BSA agrees with the statement in paragraph 70 that judgements of impact will be made by the same subject-specialist panels that assess outputs.

11. With respect to paragraph 72, it is not clear what the evidence base for panel judgements would be. How can a panel assess the significance or 'transformative impact' of work without evidence being provided?

12. There should be explicit recognition of local and regional impact and a recognition that such work can be 4\* even if not concerned with 'international;' arenas. There needs to be clarification of research impact with reference to the four nations of the UK. Devolutionary trends present sociologists with the challenge of responding to subtly different research agendas and policies in the four nations. If research has a 'transformative' impact in Scotland, Wales or Northern Ireland, is it 'international'?

12. Sociologists can show examples of important research with considerable potential impact that has been marginalised or rejected by Government or other funders. Panels should have the power to assess the transformative potential of research even if it has not had an impact on policy.

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

1. Engagement with the public (paragraph 79c) should not be assessed under research environment as it will involve double-counting of things already assessed under impact. It is reasonable, however, to assess the mechanisms and processes in place that are intended to ensure effective public engagement.

2. We support the list of esteem measures in paragraph 79c and note that much formerly measured under 'esteem' in the RAE will be appropriate to report here.

**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.

1. The BSA is strongly of the view that research impact should not be weighted as highly as 25%. While the Association accepts the importance of the measure, we have strong reservations about such a high percentage being allocated to it because impact cannot be the object of valid and reliable measurement. It is inappropriate to give such a high weighting to the most uncertain of the three criteria. We accept that there is some political pressure to include such a measure but we urge extreme caution in relying too heavily on an unreliable measure. Consequently, we think it preferable to have weighting of 70%, for Output, 20% for Environment and 10% for Impact.

**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.

1. The BSA is of the view that the legitimacy of the REF depends absolutely on the fact that all detailed aspects of assessment will be undertaken at a subject specialist level.
2. The role of 'user members' in paragraph 96c is unclear when 'beneficiaries and audiences' are already included in the assessment of research impact. As the REF is evaluating the excellence of academic research, academic researchers ought to be the majority of Panel members. It must be made clear that 'user' Panel members will be mainly involved in assessing the impact submissions.
3. On Panel configuration, the BSA thinks there is a strong argument for combining Sociology with Social Policy, Social Work and Administration in a single Panel. Given the declining number of submissions from Sociology units of assessment in successive RAEs, and the growing emphasis on 'impact', there might be greater likelihood for sociology research in future to be submitted alongside these cognate subjects. In RAE 2008 some Departments faced difficult decisions about which panel to submit to, and there was a great deal of cross-referral. A single panel would be more workable and would be within desirable size requirements.

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

1. The role and purpose of international members of Panels must be clarified before the process begins. Panel workloads will militate against any meaningful involvement of international scholars so their role may best be restricted to advice rather than involvement in detailed deliberations.

**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.)

**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?

**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?

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

The BSA strongly agrees with the statement on equality issues paragraph 112.

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

1. The results of the pilot study of 'impact' will appear too late to have any effect on the planning of REF submissions. Guidance on submissions will be published at the same time as the results of the impact study, so there will be no opportunity for reconsideration of impact measures and indicators, which is . This reinforces our concerns about the weighting of impact. This concern leads us to recommend a delay of one year in the timetable to allow the pilots to be absorbed and proper lessons drawn. As it is, the timetable is so compressed that that the pilots are not useful if their purpose is to improve practice.
2. Panels should be appointed early in 2010 so that important decisions on criteria, sub-groups, etc, can be taken early in the process.
3. The Census date for outputs should be the year-end to obviate questions of eligibility.

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

See para 122 where the BSA supports the proposed reduction in the number of outputs.

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