Response to HEFCE 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
British Sociological Association (BSA) Founded in 1951, the 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 2,700 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 54 specialist study groups which focus on major fields of research within the discipline, for example, Medical Sociology, Religion, and Work and Employment, as well as a number of specialist discussion groups, such as the Sociologists Outside Academia Group, Early Career Forum and a 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 2016 – including an annual conference attended by around 650 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 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 (REF), and with allied organisations, funding and other professional bodies to both keep abreast of and inform the responses that the Association delivers to a variety of organisations on matters of importance to sociology. The BSA also occasionally commissions research into issues relevant to the mission of the association, including most recently the REF. The BSA works closely with and supports the work of the Heads of Sociology Departments and Professors of Sociology Group (HaPs) with representation from some 80 departments or units. 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 query the infrastructure of the discipline, and works directly with government and non-governmental
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?

The British Sociological Association (BSA) welcomes the overall approach of continuity with REF2014 as far as possible. The desire to learn lessons from, and build on, the first REF is commendable. In 2015/16 we supported research to explore experiences of REF 2014 and issues for REF 2021 with sociology departments or units in 59 HEIs (19 Russell Group, 26 Post-1992 and 14 other universities). This survey included the views of 79% of submissions to the Sociology Sub Panel in 2014, UoA 23. In our research respondents were keen to limit the need for new dimensions to REF 2021 and fundamental changes to the process in 2014. Thus we welcome Lord Stern's view that the exercise should be no more onerous than REF 2014. We recognise that incremental changes are inevitable if the first REF is to be improved upon. It is essential however to maintain continuity of approach, and avoid too much change, given the relatively short time scale left if the 30 November 2020 is accepted as the submission deadline.

Members tell us that the Open Access Policy for REF published in 2014 has already added administrative burden for HEIs for the biggest element of the exercise. Stern's recommendations are radical in many areas and we believe do have the potential to increase both the workload associated with the exercise and the uncertainty of how best for institutions and subjects to respond. Both uncertainty and increased workload we know are a source of unnecessary stress to staff, stress which is counterproductive to research productivity. Our members in academic institutions will be involved in responses to outlining the potential changes which would add complexity and additional work. As a learned society we will respond to the questions relevant to our mission. That said, where we have received comments from members through our research project, and general communications, we will add these.

Page 3: Unit of assessment structure

Q3. 2. What comments do you have about the unit of assessment structure in REF 2021?

Overall we feel that the UOA structure in REF 2014 was fit for purpose. Maintaining it would assist with preparations for REF 2021, and for example minimize the need for cross-referrals. The BSA members noted the number of submissions across Main panel C and in particular Sub Panels 23, Sociology, and Sub Panel 22, Social Work and Social Policy. Cross referral remains important to ensure that people can be submitted (while pursuing their own research areas) who may be in units with a mix of such sub-disciplines. We would be keen to strengthen opportunities for cross referral and/or ensure that sociologists and social policy colleagues are both represented on UoAs 22 (Social Work and Social Policy) and 23 (Sociology). The BSA would expect to nominate to both of these sub-panels and would encourage its parallel learned society, the Social Policy Association, to consider doing likewise. We would consider the potential for a combined panel in any future review.

Page 4: Expert panels

Q4. 3a. Do you agree that the submissions guidance and panel criteria should be developed simultaneously?

Yes

Comments: In our communication with members it was noted that the two guidance booklets (Assessment Framework and
Q4. 3a. Do you agree that the submissions guidance and panel criteria should be developed simultaneously?

Panel criteria and more streamlined panel working methods were an improvement on RAE 2008. Even then there was an ever-changing set of FAQs on the REF website. It is important that criteria are informed by the input of sub-panels, this requires the sub-panels to be appointed before criteria are finalized. This will be important for the long-term credibility of assessment outcomes.

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

No

Comments:
Specialists should be recruited at the earliest point, as in REF 2014. The BSA does not support the later appointment of sub-panelists and recommends that this process is started immediately following the appointment of the sub-panel chair. This ensures that a diverse range of representatives from the discipline work on developing the criteria. And that these criteria adequately reflect key aspects of the discipline; for example the role of journals, monographs, methods and funding sources which vary across disciplines. The BSA was active in the nominations process for REF 2014, working with our strong commitment to equality and diversity. Members felt assured and confident in the criteria development with sub-panel members fully involved from the outset. It is vital that sub-panel members representing the discipline(s) involved have a sense of ownership of the criteria; delaying appointment may detract from this.

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

Yes

Comments:
Representation on the panels should be in line with the overall academic population in each discipline. The BSA worked hard to reflect this in our nominations and with regards Sub Panel 23 in 2014 we felt there was a diverse range of representatives from the academic population. One important consideration is that sub-panels must also have a broad spread of institutions represented, should not have more than one person from each institution, and should have an adequate regional balance (including the ‘national’ regions). They should also, of course, cover all the relevant intellectual specialisms. These criteria are difficult to balance against demographic considerations unless there is a large number of suitably qualified and eligible nominees from which to select. A further constraint is that of ensuring a reasonable degree of consistency of membership from the previous REF – essential in maintaining the collective memory and consistency of practices and procedures. It is not clear that these procedures could apply to the selection of impact assessors – these are far more difficult to recruit and it is often a matter of ‘taking who is available’ rather than selecting a demographically representative group of assessors. We would support the requirement that all panelists and secretariat should be trained in equality & diversity and unconscious bias. A reminder of the need to behave in a fair and objective fashion, to combat unconscious bias (especially on the status of outlets for publications) should also be on every panel meeting agenda in the same way that the declaration of conflicts of interest is included.

Q7. 5a. Based on the options described at paragraphs 36 to 38 what approach do you think should be taken to nominating panel members?

Learned societies and HEIs should also be allowed to nominate potential panel members with interdisciplinary expertise. The BSA is a member of the Academy of Social Sciences and we are well placed across the social sciences to work with the 43 member organisations of the AcSS to nominate panel members with
Q7. 5a. Based on the options described at paragraphs 36 to 38 what approach do you think should be taken to nominating panel members?

interdisciplinary experience.
As noted above the BSA was proactive with regards to equality and diversity matters and actively encouraged nominations from under represented groups before REF 2014. We note this is additional work but work we are pleased to support to ensure any panel reflects the composition of academe and higher education across the regions, nations and UK.

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

Yes

Comments:
Nominating bodies could be asked to provide information on the number of possible nominees considered for each protected characteristic under the Equality Act 2010. This should be compared with the sector average figures for each Main or Sub panel. This will place a burden on staff in charities (learned societies) and we strongly suggest that HEFCE with its budget and staff might collect such information. Relevant expertise should be balanced with equality and diversity at appointment stage. It would also be helpful to consider how ‘blind’ reading of outputs and impact case studies might be promoted. We appreciate this is complex but a debate on how we might promote the reading and assessment of outputs and limit subjective interpretations or readings would be useful, and potentially promote confidence in the process (especially amongst early career research colleagues).

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

Given the rise of impact and the proposal to increase the emphasis on interdisciplinary research we suggest that the list is split into three sections.
1) Learned and Professional societies that have predominantly single discipline interests
2) HEIs, Mission Groups and Learned/professional societies which have interdisciplinary interests
3) Research Users whose interest is predominantly impact

This would facilitate the nomination and recruitment of single-discipline and interdisciplinary specialists and Impact Assessors.

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?

In discussion with members it is clear that across higher education there is a lack of correspondence between HESA categories and UOAs. This would render automatic submission to a UOA on the basis of HESA categories, problematic. An individual may identify with one discipline (say, Sociology) and be returned to that HESA category but he or she may undertake the bulk of his or her research within the area of a different UOA (say Health) and in collaboration with researchers based in a different HESA category. The contribution of the research (and its impact) would be distorted if the individual were returned automatically to the UOA corresponding to the HESA category.

BSA Board members in senior academic roles confirm that many academics have no knowledge or say about the HESA category to which they are returned by their institution. Thus the use of these categories in the REF will distort research capacity and strength in particular areas to an unknown degree and in unknown ways.
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 allocations are generally made by HR Sections or Planning Departments for a variety of often arbitrary but sometimes strategic reasons (e.g. the management of student staff ratio figures) – they will not reflect research organisation in any obvious or significant way.

Further, members have pointed out to us that HESA Cost Centres do not map accurately or easily onto UOAs, nor do they map onto University Departmental divisions. Great care is necessary in using HESA figures in calculations of research submissions (or in implying that they can be used externally for the construction of league tables). Where practitioners of a particular subject teach and research in a Department other than their ‘intellectual home’ (e.g., a sociologist in a Medical School or School of Education) it can be a matter of institutional convenience to which HESA category they are returned. Calculations of the number or proportion of practitioners in a particular institution are therefore impossible to derive from HESA statistics. These calculation problems are compounded when HESA categories are used at UoA level.

In summary, and after consultation across our board and sociology departments we conclude that REF 2021 should continue as REF 2014, with institutions allocating staff to UOAs.

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

Our view is that the definition of research active staff should be the same as for REF 2014. Including researchers who are not required to do independent research will increase the size and scope of the exercise dramatically in both submission preparation and assessment phases. We appreciate that inclusion of all research-active staff would increase significantly the size and scope of the work in any submission.

We also note that before any deadline for the calculation of submissions there is the significant potential that universities will respond by shifting colleagues between research and teaching categories. There could well be an unintended consequence of creating a teaching pathway which colleagues in earlier or other stages of their careers with limited outputs at that juncture find themselves within, regardless of aspirations. This could be particularly problematic when lack of parity between teaching and research posts as career pathways continues in certain, particularly research intensive, universities.

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

If the overarching aims of including all research active/eligible staff and keeping the whole exercise the same size as for REF2014 are met then a reduction in the number of outputs per FTE will be required. The choice mainly depends on the volume calculations and their implications for workloads. HEFCE must calculate the likely increase in workloads with all staff submitted and see whether a reduction from four to three or two outputs is the best choice for securing workloads comparable with those in REF 2014. This is a purely mathematical decision and not one of principle.

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

From our research and general communications there is a view that a maximum of four outputs per staff member is acceptable thus maintaining the historic pattern. This might be calculated as one more than the average; for example, a maximum of 4 with an average set at 3.

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

If the REF moves in this direction, this would seem the obvious minimum compatible with submission of all staff.
Members have particular concerns for researchers and early career colleagues. There should be some consideration of whether a minimum of one obviates the need to have special procedures for reduced submission by ECRs and others. It would have to be determined whether staff could be submitted as research-active but without any outputs in the period and yet count for volume purposes. (This may be so in cases of illness or appointments very later in the REF period).

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?

There is currently some juggling and game-playing over ‘acceptance’ and ‘publication’ dates, as staff seek to ‘bank’ publications for later exercises or ensure their submission in a current exercise. Current REF practice uses date of publication as the marker and takes ‘online first’ as date of publication. However, date of ‘acceptance’ introduces yet a third date into the calculation. Will acceptance and publication be alternative markers, with individuals having the discretion to choose which marker to use, or will date of acceptance be made a compulsory requirement?
Acceptance is potentially an ambiguous marker, particularly for research monographs and chapters in edited books. For example, the time from acceptance to publication in the public domain for monographs is substantial, particularly for monographs that are accepted prior to production of the manuscript. This could mean that the main body of the work is undertaken at a different institution than the one that was the location at the point of acceptance.

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

Members express a number of concerns as there is no easy way of moving forward without creating such eligibility problems. It is necessary for HEFCE to calculate whether the scale of game-playing and eligibility problems with portable outputs is outweighed by the game-playing and eligibility issues of non-portable outputs.
It is not obvious which is likely to be the greatest.

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

Institutions can only claim publications where the individual whose publication is either a) resultant from an employment contract (i.e. was not a PhD student) or b) an employment contract which included undertaking independent research within its expectations (that is, not teaching staff or research assistants).
There must be a transitional arrangement for all staff who have moved institution since the beginning of the publication census period – Early Career, Mid Career and Late Career - and timely confirmation of the rules.
People who have moved institution cannot be placed in a situation where they are now under an expectation that they generate publications to make up for the ones now ‘lost’ to their previous institution. This proposal potentially creates great instability in the higher education labour market without a transitional arrangement.
For example, those people who moved institution before the panel criteria and guidelines on submission for the second REF have been finalized should not be treated in the same way as those who move after they are published.
Further, representatives for Early Career Sociologists and Postgraduate Students, along with the Board of the BSA, fear non-portability will impact disproportionately on some groups of academic staff, for example:
- Early Career Researchers or those moving into academia from other sectors who may find it difficult to gain employment
- Staff who join the HEI late in the REF cycle – there will always be new staff leaving one institution and joining another at the start of a new academic year. This is not gaming for REF, it is the natural break point for staff moving to a new job.
If the plan to make outputs non-portable comes to pass we would argue for exceptions e.g. sociologists who have entered academia from the public or private sector, and early career researchers.
Q17. 10c. Would non-portability have a negative impact on certain groups and how might this be mitigated?

Further, there tends to be a lack of clarity on defining ECRs. If the idea is to protect staff in non-permanent posts from being disadvantaged when applying to other HEIs, then this should explicitly include all staff on temporary contracts, regardless of time post-PhD (i.e., all those who are deemed non-returnable under the 2014 rules).

With regards impact: the current regulations over impact make it possible for institutions to submit case studies including the work of people who have left, retired, or died and the same considerations would, logically, need to be attached to non-portable outputs. This would create difficulties for institutions in obtaining evidence of date of acceptance from staff who are no longer with the institution (or, indeed, with any of us).

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

This is likely to cause great problems and add the workloads. Further, this places pressure on those who move institution and negotiations could detract from actual research time and thus prove to be a contradiction given the goal is to promote high quality research.

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:
Use of ORCID is a good idea but the timescale is short for full implementation. A major drive to promote registration should be considered if this recommendation is agreed. Academics will have control over their ORCID profiles and therefore ORCID identifiers may be more reliable than HESA Numbers. However, few HEIs have adopted ORCID for all academics and therefore this will need careful handling and administration. In the longer term, this is one place where REF could be used to streamline processes. Interoperability between ORCID, internal HEI CRIS systems and the national submission system could reduce the administrative burden. Whether this will be possible for REF 2021 is moot.

Q20. 12. What comments do you have on the proposal to remove Category C as a category of eligible staff?

This is a question best addressed by our members in HEIs but our view is that category C should be removed and any categories noted in the environment statement.

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

We are unclear as to whether or not there are changes proposed.

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

0.2FTE is the equivalent of one day per week and with flexible retirement and part time working provides a sensible minimum fractional contract.

We understand the aim to reduce gaming by appointing staff on fractional contracts close to the REF submission. An alternative approach is to introduce a minimum contract length to discourage last minute
Q22. 14. What comments do you have on the proposal for staff on fractional contracts and is a minimum of 0.2 FTE appropriate?

hiring; e.g. anyone working on a 0.2FTE contract has to have been working in the HEI since the start of the previous academic session, say 1 September 2019.
To limit ‘game-playing’ we would suggest that 0.2 contracts for those based outside the UK are excluded.
A written statement should be provided for all fixed term fractional contracts and cross referenced/contextualized in the environment statement.

Page 6: Collaboration

Q23. 15. What are your comments in relation to better supporting collaboration between academia and organisations beyond higher education in REF 2021?

The definition for REF 2021 should be broad to allow recognition for all types of collaboration whether they are movement of staff from industry into academia or secondments in both directions, collaborative research and strategic partnerships. There are also externally funded schemes such Research Council Impact Acceleration Accounts and Knowledge Transfer Partnerships; shared use of equipment or consultancy and internal seed-corn funds that stimulate collaboration.
We suggest using a specific question in the UoA environment template as there are major disciplinary differences and collaboration opportunities vary across subject areas.

Page 7: Outputs

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:
Reserve outputs here will reduce the risk where publication is in the hands of lead authors in other HEIs, notably in the case of edited books, or publishers of all types of outputs especially if the publication venue is overseas. We do, however, note that double weighting an output should be proposed on the clear basis that this is a strong, and therefore likely to be highly rated piece of work.

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

An explicit field for interdisciplinary research in the environment section would risk implying or ensuring that those subject areas with a strong component of interdisciplinary research should score stronger in this section. It could also increase institutional pressure on units to pursue interdisciplinary research.
An opportunity for outputs to be flagged as interdisciplinary seems a less contentious way of acknowledging the possible need to look at that work distinctly without undermining the value of single subject work at the individual or unit of submission level.

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?

No

Comments:
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?

Citation measures should not be used to assess quality. The arrangements for REF 2014 should be maintained. The Sociology Sub Panel and most of the social science sub panels did not use these data and would resist such a move. Research conducted by HEFCE and the ESRC has found that quantitative data cannot accurately capture the quality or impact of outputs and research in the social sciences.

Page 8: Impact

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

Yes

Comments:
Being able to demonstrate impact longitudinally through continuity of style and substance will showcase the influence of research on a range of external partners over time and through this, show the economic benefit and other contributions to society HEIs make. Support for impact assessors, to retain and ensure their input across the REF period, should be considered. They do not have the same vested interests in staying with the process as do academics, and yet their input is crucial.

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

We are fully supportive of the extended definition of impact. Academic impact may have implications for some aspects of the definition of research currently used. Teaching materials are, rightly, excluded from research, but many publications have a dual function (teaching and research) and when used in relation to the teaching of postgraduate students are an important part of ‘academic advance across and within disciplines’.

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

If yes, what comments do you have on the proposed definitions?
Please refer to our response to Question 20

Q30. 22. What comments do you have on the criteria of reach and significance?

There is the potential for guidance to constrain impact submissions. In social sciences and public health circles the example of the Black Report was often cited. This important piece of work on inequalities in health has had a major impact on further research, policy and practice but on publication was spurned by government.
On the basis of guidance provided for REF 2014 this report might not have been submitted as an impact case study.
More open guidance would allow sociologists to submit work with excellent engagement, especially work which enters public and poetical discourses but might not have a direct effect on laws, policies or services. A
Q30. 22. What comments do you have on the criteria of reach and significance?

contemporary example would be the Great British Class Survey. One suggestion made is that institutions be asked to include an explicit statement of the reach and significance that they think they have achieved.

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

Further guidance for public engagement impacts would be helpful. Guidance on acceptable evidence that is standard across all main panels would be particularly helpful. Gathering evidence beyond audience or attendance figures will be challenging, however, as impact from public engagement may be created well outside the current REF cycle. For example following up with attendees at ESRC Festival of Social Science events held 5 years ago, who are now studying or researching in social sciences as a result of participation, will be nigh on impossible. Nonetheless, the Festival continues as an annual event, enjoyed by all and is particularly valuable as a way to get young people/children interested in research and universities for the first time thus breaking down barriers between HEIs, communities and various consistencies.

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

Comments:
If the overall sentiment of the Stern Review is to be met then rewarding the HEI where the underpinning research or other activity that created the impact is paramount. Institutional support is particularly important to the pursuit of impact, therefore we understand why this should be recognized. Its continued recognition will also ‘incentivize’ institutions to support work with a social and cultural impact which does not generate the obvious economic benefits other forms of impact do. Making impact portable will contradict the non-portability of outputs, should that be introduced. Again, continuity reduces administrative burden.

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:
We agree that this would be an effective way to ensure institutions can provide further context and detail impact.

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 refer to Paragraph 91 and have nothing to add. Institutions can work out the number of case studies required once HEFCE specifies the number per staff required.

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)?
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

Comments:
These should be included but not all sections will be relevant to every case study.

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

This is a question best addressed by our members in HEIs.

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 support this proposal because it gives the widest possible picture of the impact of UK research and researchers. Impacts can derive from general expertise in a field of study such as membership of expert committees or acting as advisers and these impacts can be profound and should be recognised. The activity of impact requires the production of ‘bodies of work’ outside monographs and journals that are of significant rigour and require intensive and often extended work. That these be included and recognized is important.

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

Yes

Comments:
This seems reasonable. However, our members in HEIs will have further insights.

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?

We agree and suggest that for empirical pieces of underpinning research rigour is considered in terms of (a) the methodological approach adopted in the light of the research question (b) the choice of methods (c) a reflexive approach to methods noting the drawbacks as well as benefits and (d) approach to ethics.

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

Members have expressed some concerns that this could be employed to provide further evidence. Members on REF panels commented that audit material rarely provided useful or compelling material for panels.

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

Paragraph 107 states clearly the problem in searching for standardised measures. Perhaps there is a need for standard criteria rather than standard measures – i.e., expanding the criteria from ‘significance’ and ‘reach’ to a wider set of criteria that panels could use. This may be something that needs to be generated through consultation and initial panel discussions.

**Q42. 32c. Do you have any other comments on evidencing impacts in REF 2021?**

This is a question best addressed by our members in HEIs.

**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?**

Members have expressed a view that case studies from REF 2014 should be eligible for further submission where impact is continuing and that impact remains strong and demonstrates clear development within the current REF cycle. Each HEI should be able to assess the risks of re-using case studies against emerging case studies and submit their best selection. There may be value in limiting the proportion of case studies in a unit submission that can be submitted again to guard against established researchers being favoured over strong case studies developing now by more junior researchers.

**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:**

Short responses to particular questions would be favoured. In many departments building a positive research environment is as much about facilitating supportive relationships, as well as resources and structures, which enhance the research environment. Thus we would not agree with a largely quantitative approach to environment; to capture the work of colleagues mentoring the next generation and mid career researchers.

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

Information on the support institutions provide for individual researchers to pursue impact, for example via it being recognized as a workload or ring fenced funding, would be useful to understand the institutional value given to this distinctive area of research work.

PGR enrolments and completions are already taken into account by some UOAs and these might be extended to all UOAs.

**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?**
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 is a question best addressed by our members in HEIs.

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

No

Comments:
We note the role of the Concordat and would promote the implementation of that. To go beyond this would lead to concerns among members that open access would be assessed differently to other dimensions of the environment.

Q48. 37. What comments do you have on ways to incentivise units to share and manage their research data more effectively?

There needs to be recognition that some areas of data gathering, for example research in sensitive areas or with complex confidentiality issues, face understandable limitations to what can be placed under an open access format.

Page 10: Institutional level assessment

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

Institutional level assessment is unlikely to capture research processes of impact that bring the whole institution together. We can see there being examples of impact that work across multiple aspects of an institution and which require important levels of institutional support to make possible. There is a logic to this work and endeavor being recognized. However, it is likely that some disciplines and research areas are more likely to find themselves part of such institutional wide activities. Therefore it is important that such a development guards against damage to those disciplines undertaking their own impact work, but standing outside of broader institutional activity. Without this there is a risk of marginalization of particular subject areas.

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

This is a question best addressed by our members in HEIs.

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?

The institutional environment should be an integral part of the submission-level environment statement. This would allow panels to better understand and appreciate the barriers and opportunities departments face in their institutional context.
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 these should remain. We also note that the inclusion of the impact statement within the environment statement means an effective reduction of the weighting for the environment dimension.

Q53. 42. Do you agree with the proposed split of the weightings between the institutional and submission level elements of impact and environment?

Comments:
This is a question best addressed by our members in HEIs.

Page 12: Proposed timetable for REF 2021

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

We would appreciate timings for the nomination and recruitment of panel chairs. Likewise, we would appreciate clarity on the recruitment and induction of impact assessors.

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?

Overall, we support maintaining much of the criteria and processes of REF 2014 given the short timescale. More radical changes need longer time for consultation and piloting; perhaps for the REF after 2021.

Page 14: Contact details

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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