

GuildHE / CREST response to REF 2021 consultation on the draft guidance and criteria

The response below was submitted on 15th October on behalf of GuildHE and CREST member institutions.

About GuildHE

1. GuildHE is an officially recognised representative body for UK Higher Education. Our members include universities, university colleges, further education colleges and specialist institutions from both the traditional and private (“for profit” and “not for profit”) sectors. Member institutions include major providers in art, design and media, music and the performing arts; agriculture and food; education; maritime; health and sports.
2. The Consortium for Research Excellence. Support and Training (CREST), a sub-association of GuildHE, exists for institutions that have achieved high levels, or aspire to achieve high levels, of research excellence concentrated in smaller communities of research practice. It is the only non-geographic collaborative research network in the UK and provides key shared services and training.

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Guidance on submissions: Part 1: Overview of the assessment framework

1a. The guidance is clear in 'Part 1: Overview of the assessment framework': *Neither agree nor disagree*

1b. Please provide any comments on Part 1

We are concerned about the potential for researchers working in small units and small institutions to be easily identifiable and connected to outputs and impact case studies (para 45-6). In a UoA returning only a handful of outputs it may unintentionally expose individuals to identification, and thereby poses a reputational risk / advantage which would not apply in a larger submission. This seems to us an unfair, if hard to avoid, situation. Conversely, in some disciplines, removing all mention of the individual may result in the output making sense, or conveying its significance (for example in the creative and performing arts). We

would like further consideration of the intent of the policy here, and balancing of these concerns across disciplines.

We strongly support the emphasis on equality and diversity principles in REF2021; this is central to creating a more equitable and fair environment for research and researchers. With an understanding that this may be covered more extensively in the Guidance for Codes of Practice, we would welcome more explicit guidance on the kinds of evidence that would be acceptable for the demonstration of support for and promotion of equality and diversity, as indicated in paragraph 52e. Smaller and specialist institutions are far more likely to be developing specific arrangements for the identification of staff in their codes of practice, and that this is a burden on their available resources for preparing for the REF. Additional and specific guidance on the evidence required would help them work as effectively as possible.

We would welcome a diagram for determining institutional eligibility for inclusion in REF 2021. The overlapping regulatory frameworks make the narrative (paras 61-65) fairly confusing, particularly for new entrants to the REF.

The outline of changes to the REF and the timetable are helpful. A couple of items are missing from the timetable: Final Guidance for CoPs and appointment of additional members to EDAP.

With regard to EDAP, we would welcome a higher proportion of BAME staff on EDAP, especially in view of the low percentage of BAME staff both in the academy and appointed to REF panels.

Guidance on submissions: Part 2: Submissions

2a. The guidance is clear in 'Part 2: Submissions':

Agree

2b. Please provide any comments on Part 2.

We would appreciate more explicit advice on the method of submission for visual outputs and portfolios (para 87), and for practice-based research. Below, we highlight the independent nature of this work vs institutional responsibility, the multimodal nature of outputs as potential factors which may require more thought. Explicit guidance on the mandatory aspects of submissions, how to treat multiple works as a single 'output', and examples of where double-weighting may be considered could be useful.

We would like consideration of expectations of engagement with the development of submission software (para 88). Smaller UoAs / institutions will have less time to test this system. How are the REF team going to ensure engagement from a broad spectrum of disciplines and institution types so that the system is fit for purpose?

New entrants and institutions which have recently transitioned from FE to HE, but which have research that they wish to submit to assessment, are facing a number of challenges to respond to and comply with the timetable and processes set out.

- The survey of intentions may not fully capture these institutions true profile (para 91-92) as they may still be in the process of adapting to the REF
- The Open Access requirements present some problems (see Q8b)
- Where institutions exist in specialist subject areas, such as Osteopathy, the protocols of the major journal of the discipline does not enable easy compliance with OA policies.

We are seeking reassurance from the REF panels and managers that such institutions will have their circumstances taken into account, and that they will not be penalised for being either new to the assessment or be in discipline areas not typically returned to the exercise. We appreciate that these reassurances are often given in informal settings; perhaps an explicit description of an 'exceptional' institutional case may help?

Guidance on submissions: Part 3, Section 1: Staff details (REF1a/b)

3a. The guidance is clear in 'Part 3, Section 1: Staff details':

Neither agree nor disagree

3b. Please provide any comments on Part 3, Section 1.

The openness to HEIs being able to offer their own definitions of independent researcher is welcome, enabling HEIs to apply to their own context. However, smaller universities may be concerned about Research England not accepting their own definitions and could be penalised if RE do not accept them.

There is some confusion over how institutions may determine those deemed independent. In the guidance it states 'Those on teaching and research contracts will be deemed independent' (para 120) and that only in exceptional circumstances will it be appropriate for independence to be determined alongside significant responsibility for research. However, in flow diagrams used in the guidance and in presentations to the sector, this isn't well communicated. For example Figure 1 completely omits this option. For smaller institutions, those pursuing RDAP, those transitioning into HE from FE, or growing their research profile, determining independence *and* SSR is going to be crucial in order to submit an accurate reflection of their research outputs and environment, It may therefore be helpful to offer some clarity here, and reassurance that these institutions do in fact represent an exceptional case in the REF.

An issue arising from using the contract type as a starting point for eligibility is the resulting omission of senior staff who do have responsibility for research from the pool. This has come up especially in the case of institutions that have recently acquired university title, and

particularly for specialist institutions where it is typical that senior leaders at institutions are the primary researchers. We would like some consideration of these circumstances.

We would also like to highlight the difficulty in balancing independence and responsibility in art, design, performance and similar creative fields. By their very nature individuals generally produce work independently, so may consider themselves as independent researchers. However for the purposes of the REF and the institutional research profile, they may not have the same 'responsibility for research' particularly when compared to researchers in other fields. We would welcome some guidance for creative subjects from Panel D, and for the relevant subject specialists to be consulted where there are questions raised into the inclusion or omission of researchers from submissions in creative practices.

Finally we wish to warn of unintended consequences for smaller submissions that might result from the change in the emphasis from 'selecting staff' to 'identifying eligible staff'. Institutions will be determining acceptable ways to identify staff for the first time. Those which have small numbers of individuals will be more at risk of penalties, such as an unclassified score as outlined in para 136, should their processes or decisions not, in the event, be acceptable. We would like reassurances from the REF organisers that this will be taken into consideration and adequate feedback on proposed processes provided in a timely fashion so that such circumstances may be avoided.

4. Possible indicators of research independence are set out at paragraph 130, including a reference to a list of independent fellowships. This list is intended to guide institutions on determining independence for staff holding fellowships from major research funders. The list is not intended to be comprehensive. Do you have any comments on the clarity, usefulness, or coverage of this list?

This list has some use for research intensive and larger institutions, but it does not have great use for those without these largely high profile fellowships. As with other elements of the guidance where a list has been developed for guidance, but not intended to be exhaustive, we urge for clarity that these lists are not prescriptive nor do they indicate an expectation of institutions or of demonstrating research excellence.

5a. Do you agree with the proposed eligibility of seconded staff set out at paragraphs 121.c to d?

Yes

5b. Please provide any comments on this proposal.

No further comments

6a. Do you agree with the proposed ineligibility of staff based in a discrete department or unit outside the UK?

Yes

6b. Please provide any comments on this proposal.

No further comments

Guidance on submissions: Part 3, Section 1: Staff circumstances (paragraphs 149 to 193)

7a. The proposed approach for taking account of circumstances will achieve the aim of promoting equality and diversity in REF 2021:

Agree

Please provide any comments on your answer.

We would like more advice as to the types of evidence HEIs will need to secure to seek a reduction based on circumstances, particularly for sensitive issues.

Smaller institutions are at a disadvantage, not just due to the double burden of identifying staff and working with these new proposals for ensuring E&D. Unlike larger submissions, they will not have the option to mitigate staff circumstances through sheer numbers of individuals - i.e. they will have to seek circumstances in every case where they exist amongst their eligible staff, rather than selecting appropriate numbers of outputs from staff in a larger unit and avoiding the need to refer to circumstances, as outlined in para 152.

We would also like to highlight that by only permitting circumstances to reduce the number of outputs required, rather than reducing FTE, institutions will still be required to return the same number of impact case studies. For small submissions, the number of case studies required is already disproportionate; they must return two, regardless of whether the unit comprises 2 or 19.99 individuals - it has to be acknowledged that this is a high expectation, particularly as the next band (to 34.99 FTE) only asks for one more case study. It would seem more equitable if the staff circumstances resulted in a reduction in FTE rather than simply a reduction in required outputs, particularly at this end of the spectrum.

7b. The potential advantages of the proposed approach outweigh the potential drawbacks identified:

Agree

Please provide any comments on your answer.

We admire the spirit of the guidance and the additional examples with specific provisions therein. However, it is potentially complex to implement, and we have some reservations as to the impact this and the general policies on staff will have on individuals and institutions.

To scrutinise individual circumstances of specific members of a UoAs staff, combined with the need to identify staff that are independent researchers and who have significant responsibility for research, has the effect of re-coupling staff and outputs, or to put it another way, of placing even more emphasis on the individual than the previous exercise. Individuals will now need to make declarations to managers of personal and potentially highly sensitive information in order to have their obligations reduced, and after going through a significant consultation on their role and responsibilities at the institution. We are concerned that this is unduly overburdensome for institutions which are less research intensive, whether mid-sized, small or specialist.

Rather than reflecting and responding to the reality and practice found at institutions - such as placing staff on teaching and research contracts as a matter of course in an institution focussed more on teaching but wishing to encourage research, or on research contracts at a specialist institution seeking to engage staff in the concept of research as part of their teaching and professional practice - we fear the REF demands are dictating to institutions how they should be operating, and not respecting the autonomy of institutions to organise themselves as fits their goals and needs.

7c. Please provide any further comments on these proposals, including any suggestions for clarifying or refining the guidance.

No further comments

Guidance on submissions: Part 3, Section 2: Research outputs (REF2)

8a. The guidance in 'Part 3, Section 2: Research outputs' is clear:

Agree

8b. Please provide any comments on Part 3, Section 2.

Whilst we appreciate that the spirit of the guidance is to encourage open access and not penalise institutions for incomplete compliance, the tolerance levels outlined in para 221 do not provide material help for small submissions. It is likely that smaller institutions and those which are new to the REF and/or HE will not have the same level of preparedness for Open Access as the typical submitting institution. We understand that a line has to be drawn somewhere, but perhaps some specific guidance on how 'exceptional' submissions, such as new entrants, and very small institutions, might be managed with regards to this aspect of the policy, would be helpful.

The guidance states that the 'the maximum of five per cent of outputs will be rounded to the nearest whole output number'. To clarify, is this to be rounded up to the nearest whole number?

We welcome the flexibility for institutions submitting <250 journal articles, or where such outputs comprise <50% of all outputs, to use websites as an alternative to a dedicated outputs repository for the purposes of compliance with the open access policy (Footnote 15). However, there needs to be clarity as to the processes expected to verify the date of deposit etc. Such processes will not be immediately apparent and could be interpreted by institutions in a way that leaves them exposed to a risk of inadvertently rendering their outputs non-compliant.

There is an indication in the guidance that outputs cannot be a combination of digital and physical, but either / or (Para 289). This may present some challenges for creative outputs, or unnecessarily limit what institutions opt to submit. Some further consideration of this would be welcome.

In relation to the date of deposit, a number of academics working in collaboration with overseas partners have reported challenges to comply with the policy when they are a co-author. Getting confirmation of acceptance from the lead author if they are not UK-based is problematic, and often results in a significant delay in uploading pre-print manuscripts to the home repository. Some are concerned as to the effect this may have on the eligibility of their outputs.

9. A glossary of output types and collection formats is set out at Annex K, to provide increased clarity to institutions on categorising types of output for submission. Do you have any comments on the clarity and usefulness of this annex?

In general, this Annex provides a useful indication to institutions of the range of outputs that could be considered. However, these categories are not very well aligned to categories and definitions used by standard repository software. For example, Journal article (D) includes discussion paper in the definition, but in EPrints software a discussion paper comes under the category of Monograph and is therefore treated differently in terms of the metadata collected and (most importantly) adherence to the REF policy's open access requirements. We understand that there are multiple platforms with a range of metadata conventions, and that institutions will have adapted these to local circumstances, but such discrepancies in terminology may be worth the team considering in terms of how this list is communicated.

10a. Paragraph 206.b sets out the funding bodies' intention to make ineligible the outputs of former staff who have been made redundant (except where the staff member has taken voluntary redundancy). Do you agree with this proposal?

Yes, with reservations

10b. Please provide any further comments on this proposal.

We would appreciate more clarity on how staff on research only fixed term contracts will be treated. If the contract is not renewed or extended at the end of the term, the staff member may be considered to have been made redundant and may receive severance pay. As a

result, this staff member could potentially object to having their research output omitted, or it may not be a 'true' redundancy of a post, simply the end of a contract.

11a. Do you agree with the proposed intention to permit the submission of co-authored outputs only once within the same submission?

Yes, with reservations

11b. Please provide any comments on this proposal.

As a blanket rule for all UoAs, we do not agree, especially where there are clear and unjustified constraints placed on submissions due to the disciplinary range of a UoA, or where it presents potential discrimination for staff at particular stages in their career.

This intention could work to disincentivize interdisciplinary research where authors from a number of disciplines might work together within a certain cluster of discipline. In particular, it could disproportionately affect sub-panels which are made up of a number of disciplines as with 32, 33 and 34. Co-authored outputs between scholars working in, for example, Religious Studies and Classics could be submitted but not those between Drama and Film, and in previous exercises they would have returned to separate UoAs. Furthermore, it might have an adverse affect on ECRS if they are collaborating with a colleague within the same subpanel cluster and yet these relationships can provide valuable mentoring and experience for ECRS.

Guidance on submissions: Part 3, Section 2: Research activity cost for UOA 4

12a. How feasible do you consider to be the approach set out at paragraphs 267 to 271 for capturing information on the balance of research activity of different costs within submitting units in UOA 4?

There is a concern relating to this particular inconsistency in the guidance, and the requirement that UoA 4 reports activity cost at both the UoA environment template *and* output levels (see paras 267-271). This has the potential to build disadvantage into subsequent allocation of research funding apportioned to those UoA 4s, typically in small and specialist HEIs, where the balance of activity weighs generally towards 'other'. In particular, there is concern that differential cost categories may influence quality indicators more broadly, with 'other cost research' being judged to be of lower quality than "high cost research". This concern is illustrated via the example that much high cost and externally funded research is supported to be published in open access journals, with the opportunity for greater accessibility and therefore increased citation indices. For HEIs engaging with

more “other cost research”, the research quality could be further disadvantaged if labelled as such.

The approach is therefore arguably feasible, but clearer and more consistent guidance would be required. A support mechanism for HEIs engaging with primarily “other cost research” would be welcomed.

12b. Are the examples of high cost and other research activity sufficiently clear to guide classification?

Yes

12c. Please provide feedback on any specific points in the guidance text as well as the overall clarity of the guidance.

No further comments

Guidance on submissions: Part 3, Section 3: Impact (REF3)

13a. The guidance in 'Part 3, Section 3: Impact' is clear:

Agree

13b. Please provide any comments on Part 3, Section 3.

Smaller and specialist institutions generally perform well on impact. Whilst we welcome the increase of the value of impact in the exercise, we have outlined our reflections on the high expectations put on smaller submissions to deliver impact case studies under the current rules in our answer to Q7a.

We understand the need for funders not to base 25% of the ‘score’ on a single case study, yet even if institutions only submit UoAs above 5FTE those at this end of the spectrum are expected to generate one case study per ~2.5FTE-9.99FTE, a vast difference to the top end of the scale where it is one for every 16FTE, at a maximum.

We would hope that the funders and panel members are considerate of this in their assessments. A way to do so would be to acknowledge that such submissions are ‘exceptional’ as compared to a typical REF return, and to explicitly describe what that means in the guidance, and assess case studies as per what can be reasonably expected from a smaller UoA / environment.

With regard to public engagement as a pathway to impact, we are very supportive of the NCCPE’s views in response to this consultation. In particular we support the extension of equality and diversity considerations to the impact generated by research, not just applied to the internal arrangements for ensuring equitable treatment of research staff, and the

emphasis on coherent and transparent approaches across panels when assessing impact case studies, including those involving public engagement activities.

A shorter definition of impact would potentially make more sense than the long list of "attitude, awareness, behaviour" etc which risks leaving out some legitimate impact. So as we argued in the initial REF consultation impact could be better defined as "an effect on, change to or benefit to the world outside academia".

Guidance on submissions: Part 3, Sections 4-5: Environment data and environment (REF4a/b/c-REF5a/b)

14a. The guidance in 'Part 3, Section 4: Environment data' is clear:

Agree

14b. Please provide any comments on Part 3, Section 4.

Para 339 refers to the reporting of income to panels 'reflecting the competitive nature of such income'. We feel that the guidance needs to be more explicit as to how such information will be used to inform decisions and assessments by panels, and how value judgements based on competitive grants will be made. For smaller institutions and specialists operating in fields where applicable competitive grants are relatively modest in size or infrequently available, a judgement that 'more grants = better environment' would be disadvantageous. Institutions' environments should not be penalised for being smaller, specialised, or in the process of being established.

15a. The guidance in 'Part 3, Section 5: Environment' is clear:

Neither agree nor disagree

15b. Please provide any comments on Part 3, Section 5.

Paragraphs 355 and 356 may need some attention to reassure colleagues in institutions returning to a single UoA. At present the guidance is a little unclear, due to the placement of these paragraphs dealing with the pilot exercise and single UoA submissions. Could it please be clarified that institutions returning to a single UoA may return only REF5b, with an outline of the institutional environment where that differs from the UoA environment, and that this facility is *not* wholly linked to the pilot exercise?

We are pleased to see references to the Forum for Responsible Research Metrics in the guidance. However, as we have raised with Research England colleagues previously, this forum includes no representatives from small or specialist institutions, and as such may be omitting key considerations from its advice. We would welcome further consideration of this oversight.

Guidance on Submissions: further comments

16. Please provide any further comments on the 'Guidance on submissions', including Annexes A-M.

As invited, here are our reflections on the Code of Practice (CoP) Guidance, with the intention to assist with the further development of this draft guidance, whilst acknowledging it is not being formally consulted on.

The emphasis on staff agreeing to definitions is understandable. Can the panels and REF team confirm this means the majority of staff? Gaining 100% agreement is not achievable.

The June deadline should be achievable but current UCU negotiations may delay HEI's process in securing agreement over CoP matters. With tensions running high in the UCU, this may have a negative impact on HEIs' ability to also gain agreement on CoP issues, potentially with some branches potentially deliberately stalling process.

The expectations on institutions to run regular Equality Impact Assessments is laudable, and we fully support the principle. We would welcome more guidance on how to ensure any training offered is 'REF specific', would materially enhance the processes at institutions, and be considered adequate for CoPs. We would also welcome any training developed by the REF team that can be made available to institutions, and for details of that to be communicated in a timely fashion.

There are significant concerns amongst smaller institutions about what may look like 'gaming', especially when selecting outputs from a smaller selection of eligible academics, and balancing choices with E&D considerations. There will be less room for choice in such a scenario, and the choices made may expose institutions unfairly to adverse scrutiny. Although we appreciate that the option not to return 100% staff is not intended to provide a mechanism to weed out weaker researchers, and this is understood, one can imagine a scenario where amongst a small pool of staff, that is what it may look like. We have further reflected on this in Panel Criteria Q2c.

Panel criteria and working methods: Part 2: Unit of assessment descriptors

1. Do the UOA descriptors provide a clear and appropriate description of the disciplines covered by the UOAs? Please include any suggestions for refining the descriptors and state which UOA(s) you are commenting on.

All, they are clear

Panel criteria and working methods: Part 3, Section 1: Submissions

2a. Overall, the criteria are appropriate in 'Part 3, Section 1: Submissions':

Agree

2b. Overall, the criteria are clear in 'Part 3, Section 1: Submissions':

Agree

2c. Please comment on the criteria in 'Part 3, Section 1: Submissions', in particular on:

- where further clarification is required- where refinements could be made
- whether there are areas where more consistency across panels could be achieved
- whether there are differences between the disciplines that justify further differentiation between the main panel criteria.

Where referring to particular main panels, please state which one(s).

We would welcome as much consistency between the approaches of panels as possible in order that all research is treated equitably, and unintended hierarchies of more objective or more robust assessment do not suggest that one discipline is more rigorous than another.

Variations exist in the wording used by panels to explain approaches for cross referral. Para 148 is a good example of where more clarity is achieved. Would it perhaps be clearer for all panels to refer to the guidance outlined in paras 387-392, and for this to be referenced earlier than p.25?

Shades of difference have crept in for interdisciplinary research (IR). Mathematics requires 'innovative' interdisciplinary research (para 87), but it is not entirely clear why this qualification is necessary, nor what it means. A useful comparison is the closed approach in para 64, vs the open approach in para 96. Disciplinary differences should not impinge on the principle of supporting IR and placing it on an equal footing to research in discrete disciplines.

We are concerned over the potential 'closing down' of options for IR by providing lists of expected areas of collaboration; for example there are few examples of IR with creative arts beyond the confines of Panel D.

We applaud the explicit mention of supporting excellence wherever it is found in para 93, and we would welcome to see this as an explicit overarching principle of all panels.

A tension exists between panels asking institutions to submit their strongest work and the equality and diversity processes expected. Especially in a small submission where there is less to choose from, how do you treat all outputs and individuals equitably and choose your strongest work, without appearing to game the exercise? Any advice the funders or panels can give to guide institutions is welcome.

Panel criteria and working methods: Part 3, Section 2: Outputs

3a. Overall, the criteria are appropriate in 'Part 3, Section 2: Outputs':

Agree

3b. Overall, the criteria are clear in 'Part 3, Section 2: Outputs':

Agree

3c. Please comment on the criteria in 'Part 3, Section 2: Outputs', in particular on:

- the proposed criteria for double-weighting outputs in Main Panels C and D, and on whether requests to double-weight books should automatically be accepted
- whether Annex C 'Main Panel D – outputs types and submission guidance' is helpful and clear
- where further clarification is required
- where refinements could be made
- whether there are areas where more consistency across panels could be achieved
- whether there are differences between the disciplines that justify further differentiation between the main panel criteria.

Where referring to particular main panels, please state which one(s).

The guidance states that outputs will be judged purely on significance, originality and rigour and will not take into account impact factors or hierarchies of journals. Whilst this has been the mantra of previous exercises, some panel members have later said that (some) panels did take these factors into account. Hence the REF team's current statements are met with some scepticism. Can Research England provide absolute assurances on this matter?

We welcome the flexibility shown in the use of citation data in fields where this is a routine marker of significance, and the processes put in place to manage their use (para 263-270). However, there remain concerns relating to the use of citation data broadly, but more especially in Panel A, where it has the greatest significance in grading.

Issues include the degree to which outputs arising from high-cost and/or externally funded research, and, in addition, attracting funding for open-access journal publication might enjoy higher levels of citation, and be overly favoured in quality evaluations. This observation has

particular relevance in the UoA 4 context. Further reassurance is required on this dimension of the exercise.

That said, does the inclusion of citation data anywhere in the exercise run the risk of creating a perception of a hierarchy in the robustness, or objectivity, of assessment, or of research disciplines themselves? We feel the funders and panels could take a much bolder stance on the inherent biases that exist in the use of citations and remove them from the exercise altogether.

With regard to Panel D and multimodal outputs, could the panels clarify that institutions should select one category of output? Para 211 could be a little clearer.

Panel criteria and working methods: Part 3, Section 3: Impact

4a. Overall, the criteria are appropriate in 'Part 3, Section 3: Impact':

Agree

4b. Overall, the criteria are clear in 'Part 3, Section 3: Impact':

Agree

4c. Please comment on the criteria in 'Part 3, Section 3: Impact', in particular on:

- where further clarification is required
- where refinements could be made
- whether there are areas where more consistency across panels could be achieved
- whether there are differences between the disciplines that justify further differentiation between the main panel criteria.

Where referring to particular main panels, please state which one(s).

We welcome consistency of approaches between panels. The overt preference for one type of impact over another, or over new impacts over continued impacts, endangers the cohesion of the exercise and the relative worth of different subject areas. An example of this is the variety of indicators of quality of underpinning research given by Panels C and D in para 314, as compared to the single example of peer-reviewed funding for Panels A and B.

We welcome the inclusion of impacts on teaching for this assessment exercise, and are grateful for the outline guidance provided in the panel criteria (paras 290-291). We would also like to highlight the following as areas for potential ongoing consideration, which may benefit from explicit treatment in the guidance:

- Some of the terminologies being used by the REF and TEF to distinguish between research and scholarship can be confusing and have blurred lines. Institutions would welcome some coherence here.
- Institutions would also welcome clarification that 'reach' is not all about big numbers or vast geographical spread, especially where the relevant group being affected by the impact are by definition confined by number or location.

- We welcome the inclusion of hybrid impacts, where there is both an internal (to the institution) and external element of the case study (Panel Criteria para 291). There may also be a case to be made for impacts on teaching occurring alongside co-produced research with students.
- In demonstrating scale of impacts, a baseline is hard to achieve as students only do the course once. Would NSS be an acceptable metric in this instance? And if not, could the panels outline what other measures may be employed?
- There is a tension in achieving reach by influencing practice in another institution; staff may be inadvertently be giving their IP away in so doing.
- How would the panels judge impacts on the broader student experience, not just teaching? For example, for institutions that deliver vocational courses with industry specialisms, such as sports science that leads to olympic athlete support, or performance courses that have a direct relationship to industry standards in theatre or dance, where would such impacts 'fit'?

Panel criteria and working methods: Part 3, Section 4: Environment

5a. Overall, the criteria are appropriate in 'Part 3, Section 5: Environment':

Agree

5b. Overall, the criteria are clear in 'Part 3, Section 4: Environment':

Agree

5c. Please comment on the criteria in 'Part 3, Section 4: Environment', in particular on:

- **whether the difference in section weightings across main panels is sufficiently justified by disciplinary difference (paragraphs 322 and 323)**
- **whether the list of quantitative indicators provided at www.ref.ac.uk is clear and helpful**
- **where further clarification is required**
- **where refinements could be made**
- **whether there are areas where more consistency across panels could be achieved**
- **whether there are differences between the disciplines that justify further differentiation between the main panel criteria.**

Where referring to particular main panels, please state which one(s).

We agree with the section weightings outlined in paras 322-323.

Para 330 on the value placed on research groups seems to be contradicted by the guidance provided for Panel A in para 61 where they are explicitly encouraged.

We welcome the approach outlined in para 337 and the acknowledgment of the different issues that pertain to arts and humanities in Open Research.

The list of environment indicators on the ref.ac.uk website is useful and clear. We would however urge the panels / REF team to include all supplementary lists such as these in the guidance documents; referring to online resources overcomplicates matters and suggests these elements have a lesser or greater importance to other annexes.

We are pleased to see the HR Excellence in Research Award included in the above list of indicators. This is a mark of institutional intent and procedure that is hard won and equitably judged.

We would welcome the panels and REF managers to also consider recognising the additional and intensive work institutions are doing to achieve Research Degree Awarding Powers, and perhaps including an indicator for being in this process during the REF cycle. GuildHE have highlighted to both the REF managers and QAA of the tensions that exist for institutions preparing for both RDAP and REF concurrently, and that such institutions will be smaller and specialist in nature and therefore more likely to need to identify eligible staff. Explicitly acknowledging the scrutiny institutions are putting themselves under to achieve RDAP may be one way of recognising this. In addition, at least two concordats are mentioned explicitly (one in para 339), yet the RDAP and HR Excellence Awards are arguable more stringent processes.

It is also worth noting that some indicators, such as charter marks, are only accessible to institutions that have the resources to invest in them, and these will most likely be larger research intensives. In general the indicators as they stand have more relevance to Panels A and B - perhaps some expansion of the list (as we have suggested above) and some qualification of what is involved in achieving the indicator may be of use.

There are some allowances made for the difficulty of recruiting PGR students (para 340a.). We would argue their should also be allowances made for the challenges of delivering PGR training when institutions are not included in a well resourced DTP. These RC funded partnerships rarely include smaller or specialist institutions, which struggle to participate in schemes requiring large cohorts and matched investments that are out of proportion to their institutional environment.

The need for the disaggregation of Professional Doctorates in para 344 is not entirely clear.

The allowance made for disciplines that attract less research funding is welcome (para 345); is there a case for acknowledging the constraints of environments with less capacity to submit large numbers of bids? Perhaps the size and relative effectiveness of research office functions is an area that could be better explored.

Panel criteria and working methods: Part 4: Panel procedures

6a. Overall, the criteria are appropriate in 'Part 4: Panel procedures':

Agree

6b. Overall, the criteria are clear in 'Part 4: Panel procedures':

Agree

6c. Please comment on the criteria in 'Part 4: Panel procedures', in particular on:- where further clarification is required or where refinements could be made.

No further comments

Panel criteria and working methods: Part 5: Panel working methods

7a. a. Overall, the criteria are appropriate in 'Part 5: Panel working methods':

Agree

7b. Overall, the criteria are clear in 'Part 5: Panel working methods':

Agree

7c. Please comment on the criteria in 'Part 5: Panel working methods', in particular on: - where further clarification is required or where refinements could be made.

No further comments

Overall panel criteria and working methods

8a. Overall, the 'Panel criteria and working methods' achieves an appropriate balance between consistency and allowing for discipline-based differences between the panels.

Agree

8b. Please comment on the balance between consistency and allowing for discipline-based differences between the main panels.

Our final observation is that there remains a preponderance of models and approaches to research derived from STEM disciplines throughout the guidance.

One example is the 'model' of a post doctoral researcher and their assumed role in research (see para 132 of submission guidance). Panel D have provided a range of indicators and outputs types (Annex C) that could be well applied to all panels, and indeed replace the more generic lists and annexes (K).

We return to our opening point that we respect the need to reflect disciplinary difference and recognise this in the guidance, but we strongly warn against inadvertently creating hierarchies of 'better' research due to the perceived objectivity or robustness of assessment, or the inclusion of value judgements based on levels or sources of funding, particularly

where those practices are derived from the traditions of and best suit STEM practices. Permitting this will work against the principle of supporting interdisciplinary research, encouraging equality and diversity in submissions, and rewarding excellence wherever it is found.