

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. **In addition:**
 - a. Responses from institutions in Scotland should be **copied to** Pauline Jones, Scottish Funding Council, e-mail 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.
 - c. Responses from institutions in Northern Ireland should be **copied to** the Department for Employment and Learning, e-mail 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. Equivalent legislation exists in Scotland.

Respondent's details

Are you responding: (Delete one)	On behalf of an organisation
Name of responding organisation/individual	Council for College and University English (CCUE) and The English Association (Joint response)
Type of organisation (Delete those that are not applicable)	Academic association or learned society
Contact name	Professor Linda Anderson (CCUE) and Professor Peter Kitson (EA)
Position within organisation	Chair (CCUE) and President (EA)
Contact phone number	0191 2228059 (CCUE) and 01382 384411 (EA)
Contact e-mail address	Linda.Aderson@ncl.ac.uk ; P.J.Kitson@dundee.ac.uk

Consultation questions

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

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

The subject community had broad confidence in the methods of recruitment, the personnel appointed and the working methods of the English sub-panel for RAE 2008, and welcomes the proposal to use the same methods to appoint the English sub-panel for the forthcoming REF process.

We welcome the continued use of subject peer review as no other mode of assessment (bibliometrics or citation indices) is currently suitable for the assessment of most aspects of arts and humanities research.

We believe that the weighting of impact at 25% is too high and suggest a reduction to 15% for reasons detailed later, chiefly relating to the fact that the methodology for capturing, assessing and corroborating impact is so far untried and untested. We therefore strongly recommend a weighting profile for the present exercise of

70% (Outputs)/15% (Environment)/15% (Impact)

We welcome the retention of the most useful elements of Esteem now transferred to Environment, especially including the membership and participation in learned societies and subject associations, editing of journals, etc.

We believe that sub-panels should be left to determine their views on the issue of what constitutes critical mass for research units. There should be no a priori assumptions about this.

We seek clarification on how the template for Research Environment may be constructed: will the different elements of Environment be separated out?

Do the implications of the term 'expert review' differ from what was previously described as 'peer review'? We welcome the possibility of adding research users to the sub-panels, but would emphasise the need for the sub-panels to retain the broad range and depth of research expertise necessary to judge research quality.

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.

We would urge HEFCE to reconsider the proposal to remove Category C staff from the REF process, especially given the longer timescale required by the Impact criteria. We would support the availability of clear and transparent data about the proportion of staff submitted to the exercise by each HEI for each UoA concerned – preferably in the form of a pro-forma. We agree that institutions should select staff and outputs to be assessed.

We support the proposal that the use to be made of citation information should be left to the sub-panels concerned to decide on a discipline-specific basis.

We welcome the proposal to reduce the number of outputs assessed from four to three. This is sufficient to ascertain the quality of any researcher's output in English.

We strongly recommend that the decision on whether to double-weight certain kinds of output be left to the sub-panels to decide. We would also recommend that sub-panels be allowed to double weight a substantial proportion of their assessments and that this would not be regarded as an exceptional practice. We would also strongly support the idea that, if it is decided to double weight in English, such double-weighting is applied in the same manner as it was by some sub-panels in RAE 2008; i.e. that each relevant staff member is required to submit the full quota of outputs for scrutiny, and that, if a sub-panel decides to double-weight an output, that individual's submission moves from '3 out of 3' (assuming the quota is reduced to 3) to '4 out of 4'. (We would not be happy with submitting institutions or individuals having themselves to try to second guess whether an item might be double-weighted and having to decide whether to submit the full quota of outputs).

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.

We recognise the reasons for the introduction of Impact as a category of assessment in the REF. Arts and Humanities research has had enormous cultural impact over the long term and we are keen to co-operate with HEFCE in finding appropriate ways to measure that impact. However the level of guidance concerning how this is to be measured is currently very limited and the

proposed methodology too vague at this point in the process for the category to carry the weighting currently proposed.

We are mindful that we are still at a relatively early stage in the process of defining the nature of impact at disciplinary level, and lack robust mechanisms for recording and assessing it. We would also note that, in the proposed assessment framework, aspects of public and external engagement and research dissemination are now more explicitly assessed and rewarded under Research Environment as well as under Impact. There is thus a danger of both lack of clarity in deciding where to assess some aspects of research dissemination and impact and of rewarding them in two places.

We broadly welcome the proposal to assess impact over a longer time-period than a single Assessment cycle, and by way of case studies rather than crude metrics, but we would welcome further clarification about the distinctions to be drawn between Research Dissemination and income discussed under Environment and Impact.

We also have serious reservations about the narrow way in which impact is currently defined. While we can see the case for direct intellectual impact through published work being excluded (as this might be fairly said to be measured under the analysis of Outputs), the absence of any reference to education – the social, cultural, and economic impact of academic departments through the production of each new generation of society's teachers, leaders opinion formers – which is the most direct and substantial means by which universities produce cultural and social benefits, seems perverse.

The definition of Impact and the common menu of Impact indicators, should be as inclusive as possible, especially in the cultural sector. It might include such items as performances, literary festivals, media broadcast. We would urge HEFCE to consult with arts and humanities subject associations such as CCUE and the EA, the AHRC and British Academy in drawing up a list of impact indicators which can carry the confidence of the sector.

The requirement that the impact of research credited must be achieved through the institution's own efforts (paragraph 68), excluding the spontaneous use of research findings by other groups, institutions and bodies, seems likely to exclude from assessment some of the most fundamentally valuable forms of impact that are achieved by scholars in the Arts and Humanities. The impact of research remains the same, whether the impetus to exploit it comes from the researcher or the user (arguably the latter case is a stronger indication of real impact), and the assessment methodology needs to be sufficiently sensitive to reflect this.

We have concerns about the impact of Impact assessment on Early Career Researchers and their research profiles. As Impact takes time to develop we are concerned that ECRs may be disadvantaged by the process. Similarly a department which may have recently invested in ECRs may find itself disadvantaged in Impact terms, as its staff will not have had the chance to develop long term measureable Impact in the present exercise if Impacts are to be assessed in the REF census period. We would also seek clarification on how Impact will be assessed in equal opportunities cases where time away from research has occurred. In terms of output a reduced entry is possible to account for this, but how will Impact be proportionately reduced?

The problem of staff mobility. Who will claim research and who will claim Impact? To cite just one specific and largely administrative example: how would UoAs be expected to exploit the impact of research conducted by researchers who have since left the institution (for whatever reason), and how might the REF measure it? Will UoAs be expected (and are they legally able?) to promote the work of researchers who have moved to other institutions? And if so how? Conversely, will UoAs to which researchers have moved since RAE 2008 be expected (and are they legally able) to promote the findings of research conducted and published while they were employed by other HEIs or commercial companies? How will multiple claims for the same impact be arbitrated?

Such issues are perhaps easier to resolve where research is largely produced by teams in labs, and using plant, based in particular institutions, where the exploitation of findings can be legitimately owned by host institutions via the continuation of project teams, patents etc. In English, and the Arts and Humanities more generally, this is less obviously the case. Research (especially in English Literature – research in Language less so) tends to be highly personal in nature and embodied in specific publications; the life-span of teams tends to be more short-term and the mobility of research assistants much greater, so ownership of research is much less institution-specific; copyright in books and articles tend to ‘move’ with the scholar(s) who wrote them. The Draft Consultation is written very much with the ‘unit’ or department in mind, not with the Individual and assumes that research groupings are relatively stable.

The trade-off between Excellence and Impact. The document indicates that excellent Research Outputs should have excellent Impact, but the Impact that research may have, may not be proportional to its quality. Much poor quality research may have a substantial popular impact, and much excellent disciplinary research may not easily demonstrate any impact.

The problems of Evidence: how do we measure Impact? What are the appropriate Impact indicators for Arts and Humanities? How is the ‘significance’ of the Impact to be measured and how corroborated and made sustainable to audit. The document refers to surveys as a means of doing this, but the production of surveys is time-consuming and potentially expensive. The data underlying claims of impact will be difficult to verify. We are concerned that the impact narratives and case studies may require significant time and labour to complete, and that this may not be cost effective. An AHRC-funded research project on impact took six months to complete costing in excess of £20,000, for instance (add details). It is also the case that impact evidence for work conducted in previous REA cycles will not now be recoverable, further skewing the exercise. The enumeration of a series of clear Impact indicators that have the confidence of the arts and humanities communities is essential.

The issue of international, national, and local impacts needs to be clarified. Excellent research on local subjects may be carried out, but such research may not achieve a national or international Impact, though it may be of excellent quality.

We would also seek clarification over the grade descriptors for Impact. Does ‘ground-breaking’ mean literally that: i.e. the first research of its kind? If so, what can ‘not-quite ground-breaking’ mean? And how do they apply in terms of the kind of cultural impact that research in English Literature and Language (and the Arts and Humanities generally) commonly achieves? In what senses can collaborations between researchers and the creative industries that result in exhibitions, theatrical or musical performances, etc be said to be ground-breaking or

transformative? The ways in which Impact is being discussed seem still to be too closely aligned to mechanisms and processes derived from the STEM subjects to be fully transferable to the Arts and Humanities (a suggestion seemingly born out by the vagueness with which evidence of impact and the means of measuring it for Arts and Humanities subjects is described in the relevant Appendix).

We have some concerns over the definition of 'research users' in this context, and would welcome further guidance in due course from the sub-panel for English about how they propose to define, recruit and use this category of assessor.

Given the above, we would urge HEFCE to engage much more closely with the AHRC and British Academy, and the English Subject Associations (CCUE and English Association) to find a definition of the nature and scope of impact that carries the broad confidence of the sector, and of wider stakeholder communities. And, given that the research community is still in the very early stages of defining and promoting impact as a measurable aspect of research, we would strongly recommend that, for this first attempt to assess and reward it, Impact's weighting in the current exercise be reduced from 25% to 15%, with 10% of the weighting being transferred to Outputs.

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

See answer to Q3. While broadly supporting the mechanism described for assessing Research Environment, we note the inclusion here of elements of external engagement that are also potentially recorded and assessed under Impact. We are concerned at the potential for both lack clarity in dividing the various aspects of this still-to-be fully defined spread of activities, and the danger of double-weighting such activity by rewarding it in two places.

The reporting format should identify a rigorous and auditable standard for the reporting of PGR activity.

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.

See above. We would draw attention to the potential for ambiguity and/or double-counting in the inclusion of elements of external engagement and grant income from 'research users' as indicators in both Environment and Impact. Methods for the assessing of environment have been tested through previous RAEs. By contrast Impact is an untested measure. As such 25% would

seem too high a weighting given the uncertainty of how to assess it.

Para 83c indicates that 'REF should give differentially greater recognition where units demonstrate excellence in all three areas. The REF should avoid a 'trade off between excellent research activity and impacts. The basis will be recognition of research excellence, with additional recognition for high impact built on that excellence.' We would welcome clarification about the 'differentially greater recognition', noted here, and how 'additional recognition might be qualified.' In terms of the new Impact methodology, how will it account for special circumstances? How will Impact be assessed in equal opportunities cases where time away from research has occurred. In terms of output a reduced entry is possible to account for this, but how will Impact be proportionately reduced?

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.

Given the size, breadth and scope of the discipline nationally and internationally, and the volume of distinct and substantial outputs it generates, we are very pleased to see that English Language and Literature remains a discrete unit of assessment at sub-panel level.

Given the very different research methods, favoured forms of outputs and culture in Linguistics, we would strongly advise that Linguistics should not be absorbed within English Language and Literature.

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

Yes. It is important that analogous disciplines such as History and English achieve broad parity of approach. This was not possible in RAE 2008, as these subjects were grouped under different Main panels. We would seek further clarification on the roles of user groups and international Members on the sub-panels/main panels.

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

No suggestions

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?

Yes. Sub-panels seem now to be mindful of the need, where necessary, to consult over interdisciplinary research. The REF framework, like that of RAE 2008, seems sufficiently flexible to allow such cross-reference and consultation to happen. In English interdisciplinary research is now probably the norm.

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?

The proposals seem well designed to encourage and reward mobility of researchers between HEIs and outside bodies, industrial and commercial organisations, which may well be desirable. But they seem less well designed to cope with movement between HEIs. As with RAE 2008, the absence of a category A* for staff, and compensation for departments and units who lose key staff in the period immediately prior to the REF census date seems designed to encourage 'poaching' and 'game playing' between departments to the detriment of long-term strategic planning.

We look forward to further clarification of the definitions of 'staff' and 'industry' in this proposal and would support a broad definition of industry that includes the creative and cultural industries, and libraries.

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

To militate against poaching and game-playing, we would encourage the reintroduction of Category A* staff, for staff moving between HEIs within 12 months of the census date, with a proportion of their outputs being retained by the departed institution.

We would expect a clear commitment by HEFCE to promote equality and diversity.

We note with concern that on the Impact Pilot Exercise Steering group only 4 out of 14 members are female, only 2 from the Social Sciences, and none from the Arts and Humanities. A commitment to equality needs to ensure equality at all levels and a representation of all disciplines in the decision-making process.

We are concerned about the issue of Impact on those staff who may have career breaks and for Early Career Researchers.

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

Given the publication pattern in English, the lengthy time-lag between submission of articles to

the leading journals and monographs and other volumes to academic press and eventual publication, and the time required to bring major projects to fruition, and the relative lack of clarity about the nature of and measurability of Impact, we would strongly recommend delaying implementation of the REF by at least twelve months.

The current submission date in late 2012 appears precipitate and unworkable, especially in view of the proposed introduction of the new and untested methodology to assess retrospectively impact. Panel criteria will thus be available very late into the process, (the second half of 2011) without sufficient time for consultation and clarification. Time will be needed to train and select research users. 2013 at the earliest is a more practicable time. Given that many outputs published in 2007 were excluded from RAE 2008 owing to uncertainty about their likely publication date, HECFE might also consider allowing work published in 2007 but not submitted to RAE 2008 to be assessed in the present REF assessment given the issue raised above. Otherwise it is anomalous that a period of time will be effectively be assessed in neither exercise.

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

We welcome the introduction of the proposed template or pro-forma for Research Environment. This should substantially reduce the time that UoAs spend in presenting their research culture through the discursive format.

The decision to reduce outputs from 4 to 3 would seem to be an effective mode of reducing the burden on assessors as would the use of larger Main panels. The inclusion of Impact among quality elements may further increase the burden of assessment in writing case histories for every 1 in 10 members of the unit (perhaps a variable rate of 1 in 10 for the first 20 then one in 20 hereafter might be more manageable?) and the substantial time and labour involved in locating verifiable and auditable evidence for impact. If the evidence collected for Impact is to be robust and of auditable quality, it will be burdensome in time and expensive to collect. We would also urge that HEFCE allow very small departments to be able to submit two case-studies rather than just one if they so wish.

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

We would strongly urge HEFCE that there is significant representation from the AHRC BA and English subject associations and learned societies when the REF guidelines are drawn up following this consultation and piloting process.