

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	SCUDD
Type of organisation (Delete those that are not applicable)	Academic association or learned society Professional body
Contact name	Dr Nicola Shaughnessy
Position within organisation	Secretary of SCUDD REF Working Group SCUDD REF Working Group Chair: Professor Maria Delgado Vice-Chair Professor Robin Nelson Membership: Professors Mick Mangan, Stephen Lacey, Carole-Anne Upton, Drs Vida Midgelow, Roberta Mock, Nicola Shaughnessy. Advisor to the Group: Professor Chris Baugh
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Consultation questions

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

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

We broadly agree with the proposed key features of the REF. We have consulted with the member organisations to ensure that the REF has the full confidence of the subject community to operate effectively. There are key aspects (presented below) that remain unresolved and/or problematic and we would ask HEFCE to give these due consideration.

1. We judge the most significant problem to lie with the proposed weightings allocated to outputs, impact and environment (60: 25: 15). We are concerned that the REF's incentivisation of research excellence may be compromised by the proportionally high weighting of impact (as yet untried, untested and uncosted) at 25%. SCUDD is particularly concerned with the apparent attempt to instrumentalise academic research for the achievement of key policy directions and ambitions for economic growth articulated in paragraph 12a.

SCUDD's membership are of the opinion that outputs – directly measurable by peer review – should stand at a minimum of 65% (and ideally 70%). The basic premise underpinning the articulation of impact in the consultation document – that 'good' impact is necessarily derived from equally good research – is yet to be proven.

2. We see peer review, informed by metrics, as the key means of assessing research excellence. We would welcome clarification on the proposed 'expert' review. How does this differ from the accepted term 'peer' review?

3. There is little detail on the template that will be used for submissions. Will it be largely narrative driven as with the previous RAE5? Will the different elements proposed for the Environment section of the REF be separated out in a particular template for all UoAs?

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 are in agreement that institutions should select staff and outputs to be assessed.

Nevertheless there is a recommendation from a significant component of the discipline that there should be a recognised system of checks and balances to ensure consistency and parity across institutions. A small proportion of Drama departments disagreed with the statement in paragraph 30 that 'the proportion of staff selected should not be a significant factor in assessing quality in the REF', arguing instead that demonstrating excellence throughout a UoA should be a key marker of excellence.

Category C researchers often make a key contribution to research in Drama departments. Their proposed exclusion from the REF fails to allow for the recognition of this contribution.

We would recommend that staff on fractional contracts be permitted to submit a quantity of outputs that corresponds to their fractional appointment.

We welcome the recognition that 'staff with particular circumstances that have constrained their capacity to undertake research during the assessment period will be able to submit fewer than the maximum number of outputs'.

We would encourage HEFCE to ensure that the REF guidelines make clear that institutions are advised to submit all types of high-quality research outputs (including applied, translational and editorial work).

We would urge HEFCE to ensure that due recognition is given to practice-based research which often has more than one outcome per project.

We would argue strongly for an emphasis on prioritising the quality and excellence of the research. This may be compromised by an excessive focus on impact that will encourage HEIs to prioritise forms of research where the impact may be more demonstrably measurable.

In the case of Drama, Dance & Performing Arts we have no confidence in citation information as a measure of research excellence.

We would argue strongly for a maximum of three outputs submitted per researcher. We would suggest that it is more feasible to produce three pieces of excellent research in such a short time frame. This will also reduce the administrative burden on the REF – 'the intention that the mechanisms should become simpler and less burdensome' (paragraph 7) without compromising quality.

We note with concern the revision of the grade descriptors, specifically at *4 (paragraph 41). This suggests an apparent pre judgement of the number of outputs classified as of world-class standing.

Where the choice stands between three outputs or double-weighting, we would see a preference for the former. If double-weighting is to be introduced we would expect clear guidance from UoA subpanels as to its use and definition.

We would recommend all outputs to be accompanied by short 300 words statements that testify to their significance as research, including discussion of appropriate impact and esteem indicators.

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.

While SCUDD welcomes the introduction of impact as a category of assessment in the REF, the current definition of and guidance on impact proposed in the Consultation document is limited and weak. Both the definition of impact and the common menu of impact indicators need to be more inclusive of all forms of impact, especially in and on the cultural sector. We would urge that HEFCE offer a definition of impact that recognises the context for research (social, philosophical, ethical etc) in society. We would ask you to consider footnote three: 'where we refer to "impact" or "social and economic impact", we include economic, social, public policy, cultural and quality of life impacts'. Elsewhere in the document this contraction seems to indicate a more concrete narrowing of the term. Impact should refer consistently to 'social, cultural and economic impact'.

It would be inappropriate to underestimate the substantial contribution of research to the service sector economy and broader cultural engagements.

The REF needs to ensure that impact and engagement outside the UK is considered and recognised. It may be more difficult to measure 'international' impact but this should not lead to a preference for 'impacts' that can be more obviously quantified because they are 'local'.

The level of guidance concerning the evaluation of impact in the Consultation document is also, in our view, poor. The rigorous task of gathering and verifying claimed impacts requires significant time and labour on the part of HEIs. This process will not be efficient or cost-effective. The AHRC's commissioned impact study on its funded research project 'At Home in Renaissance Italy', undertaken by Annabel Jackson Consultants, cost over £20,000 [see <http://www.ahrc.ac.uk/FundedResearch/Pages/ImpactCaseStudies.aspx>]. SCUDD is concerned that research will effectively be replaced by exercises auditing any possible impact

of research in the most elementary metrical terms? Metrics may not always provide appropriate indicators of research impact or excellence.

We are additionally concerned that data underlying claims of impact will be especially prone to narrative amplification by UoAs and difficult to verify, especially to an auditable level, and expensive or difficult to collect. Without audit-quality data, and audit itself, we are concerned that impact case studies will lack persuasive credibility.

How will panels know whether impact is built on research excellence? There is an assumption through the consultation document that excellent research will generate quantifiable, assessable impact. A situation could be envisaged where there is impact, but on indifferent or 'poor' research – the impact from a piece of research subsequently found to be of uncertain quality around the MMR vaccine is an obvious case.

SCUDD would recommend greater clarity concerning the number of impact case studies – one for every 5-10 researchers leaves a wide margin of uncertainty. A staff of 25 researchers could submit 2 or 5 case studies – a substantial difference. Also, the proposed approach to assessing impact through case studies may discriminate against 'islands of excellence' (paragraph 27j) that will not be able to represent the impact of their research in these ways. We have no confidence that the use of case studies as proposed in the document would 'be conducted against equally demanding standards-and with a similar degree of differentiation between activities meeting these standards – to the assessment of research outputs.' (paragraph 53d).

The Consultation document provides limited guidance on the 'time lag' of impact and the implications of staff mobility. Both these factors will further create problems in terms of retrieving data to underpin the narrative of any impact studies. We would recommend that the maximum retrospective period remains 15 years.

The exclusion of 'Teaching' under paragraph 53b requires clarification. A textbook that represents a distillation of many years of original research and which is designed to spread awareness of debates in the discipline to a wider public (including school age children) appears to be excluded, where this might be an important and legitimate example of impact. We would welcome clarification of this position. As it stands the Consultation document's concern with impact outside the academy does not sit well with the REF's overarching definition of research.

Although SCUDD welcomes the proposed role of research users in assessing impact, we would welcome further clarification on how 'research users' will be trained. Peer review underpins the work of the academic community and training is often ongoing in this area over years and indeed decades. There needs to be a measured consideration of the training and development required to undertake assessment of impact credibly and rigorously. Additionally, we would welcome information on the proposed range of user representation on the panels. Will they reflect different research interests and expertises? Does HEFCE anticipate a college of research users that represents a broad spectrum of UK industry, including the cultural industries, charities and NGOs? It is of key importance that the conclusions offered by the research users be mediated by the subpanels and main panels.

We note with concern the composition of the steering group of research users identified for the Impact Pilot Exercise, which is dominated by representatives from industries related to STEM subjects (especially medical research and computing), and does not have any representation from the cultural industries. Further we would welcome an expanded understanding of the term “user” to include all beneficiaries of cultural impact.

In view of all the points made above, SCUDD would share HEPI’s recent reservations on the proposed weightings given the ‘serious methodological questions’ that face the proposed assessment of impact. We would recommend HEFCE consider the AHRC guidelines on impact which we regard as more relevant to research in the Arts and Humanities.

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

The proposed approach to assessing research environment seems sensible.

A significant proportion of the SCUDD membership does have concerns, however, that the weighting given to research environment is too low. A UoA’s research environment is key to the nurturing of both research excellence in outputs and impact. Research environment will provide key metrics (on research income and postgraduate numbers for example) and yet these quantifiable elements seem to have a reduced presence in this Consultation document.

We would ask HEFCE to ensure the REF develops a robust standard format for reporting research income and data. Income for research in Drama often comes from a wide range of sources including cultural bodies and foundations, charities and government agencies. It is important that HEFCE allows modes for this to be recognised in the submission of data and that a diversity of evidence be provided for commissions and grants won in open competition.

We would welcome clarification between what HEFCE understands by engagement (paragraph 79) and impact. As it stands this distinction is unclear.

There needs to be a consistency in reporting PGR activity. Consideration should be given to the inclusion of MAs/MRES in PGR data.

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.

While we accept the proposal for combining output, impact and environment in profiles, we would strongly recommend that impact should not be allocated a higher weighting than environment. There is strong support from the SCUDD membership for proposed weightings at 70 (outputs): 15 (impact): 15 (environment).

The means and methods for assessing environment have been tested through previous Research Assessment Exercises. Impact is as yet an unknown factor and it seems problematic to allocate it a high percentage weighting in advance of the pilot study.

The introduction of Impact weighted at 25% effectively means a reduction in the weighting allocated to research outputs. We know from the Subject Review provided by subpanel 65 that some of the finest research was concerned with the pursuit of knowledge and understanding. The weighting of impact at 25% threatens the validity of such research and will encourage HEIs to encourage the reorientation of research along impact lines. We would therefore recommend that the percentage allocated to research outputs be increased.

We are concerned at paragraph 83c ('We propose that the 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 quantified.

There is strong support for the weighting between the three elements to be the same for all UoAs to ensure clarity and consistency.

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.

SCUDD members welcome the rationalisation of the number of main panels, but we are concerned that their present shape and number is inefficient and will cause problems. The main panels are so broad that consistency may prove difficult to achieve. We would welcome an increase in the number of main panels, so that broader disciplinary differences will not be subsumed. Might not Panel D be effectively divided into a Languages and Literatures panel, a Histories and Social Sciences panel and a Creative Arts and Arts Practices panel (or a Languages and Histories panel and a Creative Arts and Practices panel)? Drama would argue that its research cultures are best served by a main panel structure that recognises shared practices – including Practice-led Research -- between the creative arts (as with main panel O in the 2008RAE), and a subpanel structure that understands the paradigms, practices and priorities of research in Drama, Dance and the Performing Arts.

We see it as very important that disciplinary specificity is not lost within subpanels. We do not support Drama's amalgamation with Music. Whilst there are methodological similarities between Music and Drama in some research practices, the expert knowledge required for peer review is quite distinct between the disciplines. RAE2008 subpanel 65 had 16 subject specialists. If in the REF there are 8, alongside 8 for Music, the subpanel might be woefully unrepresentative of both subject areas? SCUDD would recommend that HEFCE retain subpanels within congruent disciplines (Drama, Dance, Cinematics) and notes with concern the omission of Film from the proposed panel configuration. Drama and Music have been grouped in other external bodies – within AHRC panels and in the Higher Education Academy Subject Centre, but within such bodies the disciplines have operated in parallel rather than by combination.

How will 'associate members' be trained to ensure consistency of standards? How will confidentiality be maintained with large groups of 'associate members'?

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

We broadly support the proposed approach to ensuring consistency between panels.

We recognise that while main panels did have 'significant influences in achieving consistency across their fields' in RAE2008, this was in part because the fields were organised around more coherent disciplinary areas (such as the creative arts panel O). The excessively broad fields proposed in the Consultation document, with the REF main panels organised around sectors, suggests that consistency will be harder to achieve, even when procedures are more centrally prescribed. We would welcome further clarification and consultation on the proposed 'detailed guidance' to be offered. We would also recommend clear procedures and regular meetings between main panel chairs (rather than a small number of large main panels) as a means towards consistency.

We would welcome clarification on the role of proposed international members.

Clarification is also sought on the role of user groups across the different disciplines. This may be more relevant for some disciplines than others. How will user groups participate?

We would encourage further clarification of the proposed flexibility around preferred indicators of impact (101.d). Given the weighting accorded to impact in the combined profile, some aspects of impact indicators should be consistent, such as statements about the audit quality of data submitted.

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.)

TaPRA [Theatre and Performance Research Association] may be an appropriate organisation to be on the list of nominating bodies but SCUDD envisages communication and consultation with a range of bodies including TAPRA, CDS, SCODHE, NAMHE, MECCSA.

A case was made by one member institution for the addition of Creative Scotland.

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?

Interdisciplinary research is the norm rather than the exception in our discipline. We feel confident that a subpanel that represents the discipline will be able to robustly assess research excellence in interdisciplinary work. We feel that this will be facilitated by a Drama subpanel rather than a Drama and Music subpanel.

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

We support the proposals for encouraging and supporting researcher mobility.

We would encourage 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.

We would welcome further clarification of the notion of researcher mobility and the former category C staff definition.

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

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

A code of practice for institutions could be helpful.

A number of member institutions of SCUDD questioned the concern with equality and diversity in that it does not seem to be consistent with the overarching agenda of the REF which is to foster selectivity and reward high-end excellence. There is a disconnect here between the modelling of the REF as an assessment of the unit of submission and the profiling of the individual researcher. The documentation seems simultaneously to personalise and depersonalise the process.

We note with disappointment that on the Impact Pilot Exercise Steering Group only 4 out of 14 members are women. Only two come from the Social Studies sector 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 decision-making processes.

We would recommend HEFCE digest the findings of the 'Equality and Diversity in the Research Assessment Exercise 2008' report and note with concern the findings of the HEFCE Issues paper (September 09/34) entitled 'Selection of staff for inclusion in RAE2008'. (See paragraph 9 of the Executive Summary 'the data shows a difference between the rate of selection for men and women in RAE2008 – for example in the "Permanent academic staff" pool 67 per cent of men were selected compared to 48 per cent of women. When age is considered in combination with gender, the model output shows that differences continue to be most apparent in the 30-50 age range despite the changes between the RAE2001 and RAE2008 selection process to promote equal opportunities in the RAE.' See also paragraph 11 of the Executive Summary for the identification of lower selection rates among Black ethnic groups.)

SCUDD would like to see panel members drawn from institutions in England, Wales, Scotland and Northern Ireland.

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

Submission date in late 2012 appears precipitated, especially in view of the proposed introduction of impact as a considerable factor in research assessment. Our primary concerns are that:

1. Panel criteria will be available very late into the process without adequate time for consultation or clarification.
2. There is insignificant time to align criteria to metrics available from databases in the Arts and Humanities.

We believe submission in 2013, at the earliest, allows for a more workable and more practical timeframe.

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

We would see a decision to use 3 rather than 4 outputs as an effective measure to reduce burden.

We consider that the impact statements and case studies, if the information and data they present is to be of auditable quality, will be highly burdensome in time, very expensive and prone to narrative inflation.

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

We would recommend:

1. That the research concerns and practices of the creative arts do not become subsumed by literary and historical disciplines in the proposed main panel D.
2. That the role of the creative and cultural industries be recognised in the formulations for assessing impact.
3. That there is sufficient representation from the Arts and Humanities when the REF guidelines are drawn up following this consultation process.