

## Annex A

### Consultation response form for the Research Excellence Framework

1. Respondents should complete the form below.
2. Responses should be e-mailed to [refconsultation@hefce.ac.uk](mailto:refconsultation@hefce.ac.uk) by **Thursday 14 February 2008**. HEIs in Northern Ireland should send a copy of their response to [research.branch@delni.gov.uk](mailto:research.branch@delni.gov.uk)
3. Institutions wishing to express an interest in taking part in the pilot of the bibliometrics indicator should e-mail their details to [refconsultation@hefce.ac.uk](mailto:refconsultation@hefce.ac.uk) by Thursday 31 January 2008.
4. We will publish an analysis of responses to the consultation. Additionally, all responses may be disclosed on request, under the terms of the Freedom of Information Act. The Act gives a public right of access to any information held by a public authority, in this case HEFCE. This includes information provided in response to a consultation. We have a responsibility to decide whether any responses, including information about your identity, should be made public or treated as confidential. We can refuse to disclose information only in exceptional circumstances. This means responses to this consultation are unlikely to be treated as confidential except in very particular circumstances. Further information about the Act is available at [www.informationcommissioner.gov.uk](http://www.informationcommissioner.gov.uk).

#### Respondent's details

**Are you responding:** On behalf of an organisation

<b>Name of responding organisation/individual</b>	Media, Communication and Cultural Studies Association
<b>Contact name</b>	Prof. Peter Golding,
<b>Position within organisation (if applicable)</b>	Hon. Secretary
<b>Contact telephone number</b>	01509-222451
<b>Contact e-mail address</b>	P.Golding@lboro.ac.uk

## Consultation questions

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

**Consultation question 1a:** Do you endorse our proposals for defining the broad group of science-based disciplines, and for dividing this into six main subject groups, in the context of our new approach to assessment and funding?

The Association does not have a view on this question

**Consultation question 1b:** Are there issues in relation to specific disciplines within this framework that we should consider?

Many of our members work in inherently inter-disciplinary fields. Our subject area straddles a range of disciplinary bases across the arts, humanities and social sciences. It also has strong links with technological and scientific research. We do not believe it would be healthy for the assessment exercise to proceed on the basis of a simple binary division between the STEM subjects and all others. Not only does this pose major difficulties for 'boundary' subjects (not only ours, but others such as geography, psychology, sports sciences, some health related research areas, etc). It also may lead to a two-tier or twin track system which will become self-perpetuating and, whether intentionally or otherwise, hierarchical.

**Consultation question 2a:** Do you agree that bibliometric indicators produced on the basis that we propose can provide a robust quality indicator in the context of our framework?

Our concerns here are two-fold, methodological and substantive. Plainly, citation counts do not measure quality. They may correlate with and closely echo peer judgements, but they are not in and of themselves sufficient indicators of quality. However, if used, the major concerns are:

i. The current suggestion of Web of Science (Thomson Scientific) as the database to be used for calibration of citation counts is acknowledged to be problematic. WoS is demonstrably incomplete in many areas

ii. The evidence suggests that variations in citation practices occur within disciplines as much as across disciplines, so the issue of calibration cannot simply be to the average for the subject as is proposed in 'science' subjects. It is difficult to envisage a reliable way in which to develop disciplinary citation norms in interdisciplinary areas against which to compare individual counts. This would be especially true in fields such as ours which encourage publication across a very wide range of outlets in the arts, humanities, and social sciences.

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iii. One particular and obvious concern is the inconsistency of authorship names. Initials are used inconsistently, names change over time according to usage or custom, including marriage, journals have differing policies in relation to initials or full first names

iv. The Consultation and HEFCE documentation anticipate many of the methodological difficulties of citation counts, and indeed the more familiar have rapidly acquired shorthand epithets – ‘cold fusion’ for high citation counts for disproved science – counts of citation cannot, after all, deal with the nature of the citation; ‘sleeping beauties’ for important work whose recognition is delayed, and so on. The difficulties for early career researchers (whose work may be outstanding but too recent yet to have achieved high citation counts), for collaborative work across institutions, for interdisciplinary work, are increasingly well rehearsed. We are concerned that these difficulties are somewhat deflected in anticipation by HEFCE as technical issues that may, it is hoped, be rapidly addressed, or for which, even though they are acknowledged problems, there is ‘no evidence’ of a distorting effect. In many cases this claim is no stronger than the counter-claim that there is also no evidence, other than common sense and professional judgement, that they can not and will not have a serious effect on citations.

**Consultation question 2b:** Are there particular issues of significance needing to be resolved that we have not highlighted?

1. Citations measure one form of impact, namely on debate and discussion within their field in a particular set of outputs (mainly conventional academic journals). However, we would like to see the impact of research assessed and adjudicated more comprehensively. For example, much applied research is taken up by and has a major influence on work in policy and practice, from public policy to industrial performance. Often, such work has a major impact in advance of or without any significant presence in the literature. It is essential that the impact of research of all kinds is considered in assessment of quality, over and above what may be indicated by bibliometrics. The Secretary of State has recently suggested that research which has value for and impact on government policy should be assessed positively, even if not conventionally published. Others have argued that research that is taken up swiftly in application is research of undoubted value and importance, but that this cannot be captured by citation counts and may, indeed, be discouraged by their over-emphasis. We wish to see such research encouraged and valued, and at very least factored into the REF as one among several measures of excellence.
2. We are especially concerned with the proper recognition and assessment of practice led research. This has provoked much debate in the context of the 2008 RAE. In a system driven by bibliometric measures of citation counts this could have very deleterious effects on the assessment of practice based research. In the field of media and culture such work is of great importance. This issue is not addressed in the Consultation.

**Consultation question 3a:** What are the key issues that we should consider in developing light touch peer review for the non science-based disciplines?

We remain unconvinced that a wholly separate assessment structure for one set of disciplines is appropriate. If a system is sufficiently robust to meet the needs of assessment and to command the confidence of the sector then it should be applicable to all disciplines. If it is only appropriate for some it is likely to be wholly reliable for none. In any form of light touch peer review (and we see no possibility of complete removal of peer review from any future form of assessment) we are concerned that in the interest of economy and efficiency assessment will be too far removed from the disciplines.

**Consultation question 3b:** What are the main options for the form and conduct of this review?

We are concerned at the implications of reducing the number of assessment groups, especially for a system in which peer review will remain significant (as in the subjects currently expected to be subject to 'light touch' peer assessment). By definition, such panels (broadly akin to the parent Panels in the RAE 2008) will cover such a diversity of disciplines that their members will be far removed from professional expertise in a large part of the material they are required to assess. This either means their collective assessment is weakly informed, or it loads impossible expectations on one or two subject specialists within each panel.

**Consultation question 4:** Is there additional quantitative information that we should use in the assessment and funding framework to capture user value or the quality of applied research, or other key aspects of research excellence? Please be specific in terms of what the information is, what essential element of research it casts light on, how it may be found or collected, and where and how it might be used within the framework.

Please see our answer in relation to practice led research (2b above). There is an underlying concern here about the nature of assessment of research excellence. User value in the humanities and social sciences can only reliably and fully be captured via peer review. There are no wholly objective measures in the arts, humanities and social sciences that reflect user value or that can be used to assess the impact on public policy. It is also the case that 'use' may tend to be understood narrowly, in a limited way, as having immediate and discernible impact on activity in policy application. We are concerned that recent reports (e.g. RCUK *Excellence with Impact*) recognise research as a public good and its contribution to general culture, but in practice move quickly to a narrow definition of economic value (moreover, one that is contentious in its own terms when it comes to be measured). The RCUK report itself notes that "it is difficult to measure the economic impact of innovations which may be delayed in time and indirect in consequence."

**Consultation question 5:** Are our proposals for the role of expert panels workable within the framework? Are there other key issues on which we might take their advice?

See 3b above.

While we support the introduction of measures to lighten the burden and cost of peer review, this must not be at the cost of its rigour. Peer review should continue to be by panels of experts; research on peer review suggests that peer reviewers are able to operate with norms of appropriateness and fairness in judgements of work utilising different approaches within a discipline. If discipline-based panels are unacceptable to HEFCE on financial grounds, the subject groupings should not be too large, being restricted to closely cognate subjects. The broader the panels, the more likely they are to rely on metrics (and especially citation metrics). One key issue on which expert panels might advise is the validity and significance of any metrics which inform the assessment of research quality.

**Consultation question 6:** Are there significant implications for the burden on the sector of implementing our new framework that we have not identified? What more can we do to minimise the burden as we introduce the new arrangements?

This issue is difficult to assess in advance of pilot work on the nature and logistics of data gathering and checking for assessment purposes.

**Consultation question 7:** Do you consider that the proposals in this document are likely to have any negative impact on equal opportunities? What issues will we need to pay particular attention to?

There is a serious possibility of disadvantage to at least the following groups:

- Early career researchers who may take a while to establish a substantial citation count, especially if they are working in fields that are not themselves well established
- Researchers, including established scholars, working in new and developing fields and publishing in outputs with limited visibility to established databases or which have yet to acquire wider visibility despite the innovative significance of their contents.

**Consultation question 8:** Do you have any other comments about our proposals, which are not covered by the above questions?

1. In view of the major, and as yet inadequately investigated or considered, difficulties with bibliometrics in all disciplines, we are unconvinced of the need to move ahead with undue haste, given the care and resources that have been invested in RAE 2008. That the as yet unconvincing and seriously uncertain methodology of bibliometrics is currently intended to be deployed in less than a year from now, to inform funding formulae from 2010, seems to us inappropriately swift, and we strongly urge a revision of this timetable.
2. In general we welcome a move to a less demanding and less resource intensive form of assessment. We look for certainty that any such economy is not simply a transfer of demands from HEFCE to institutions. It is also essential that the assessment is understood and accepted by the sector to inform and enhance research quality as well as contribute to an objective basis for resource distribution.
3. We are firmly committed to the principle of 'dual funding' to enable a diverse research base in higher education which will enrich the learning and teaching environment and ensure the optimal contribution of universities to the public good. For this reason research funding should be allocated by means of a nationwide, transparent and fair system of research assessment. We would be wary of allocation of QR money via the research councils (such as by 100% FEC), not least because this might be severely damaging for research in the humanities and social sciences where much more research is directly funded from QR. QR money is essential for the health of the research base in these as in other fields.
4. It is vital that any future form of research assessment encourages and rewards innovation and excellence in rapidly developing and inter-disciplinary fields.