

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

- 1.1 The REF is a fundamental part of the UK's dual support system for research funding. It is essential that the methodology is based upon the latest thinking about research assessment, utilises peer review, is sufficiently granular to enable the distribution of QR, and has the confidence of the HE sector and other stakeholders, in all countries of the UK and internationally. It is also essential that there is consistency and clarity in how the REF operates. Institutions need clear guidance about what is expected. The requirements for consistency between Units of Assessment need to be clearly defined and enforced.
- 1.2 The Framework for Higher Education "Higher Ambitions" sets out the government's commitment to supporting and protecting the UK's "strongest, world-leading centres of research". It recognises that in a climate of scarce resources public investment must be prioritised on strengthening research centres with world-class capability and that this should mean more concentration of research and resources. The Framework states that this approach is necessary to protect the UK's international reputation for research excellence and to enable the UK to compete successfully to attract the world's best researchers, brightest students, and inward R&D investment.
- 1.3 The Russell Group believes that it is important that the REF reflects this framework in its assessment methodology, as well as in the method subsequently used to allocate QR funding. The REF should recognise and reward the very highest levels of excellence in research, and should avoid driving a growth in volume of lower quality research.
- 1.4 Higher concentrations of research excellence help to maximise the impact of research and provide a rich environment for training and developing post-graduate researchers. Critical mass within an institution is also the foundation for innovative, interdisciplinary research collaborations that are key to solving global challenges. The REF needs to recognise and reward such concentrations of excellence, particularly where this involves interdisciplinary collaboration.
- 1.5 Therefore, whilst the Russell Group broadly endorses the proposed key features of the REF, there are 3 areas where we ask HEFCE to look again at the proposals:
 - The proposal that "impact" should be weighted more highly than "environment" in the overall assessment. As discussed below, we believe that the introduction of impact assessment at a level of 25% carries substantial risks which are unlikely to be fully addressed by the impact pilot projects. The proportion of the overall assessment based upon impact should be reduced. We also believe that a well-managed, well-resourced research environment, underpinned by sound strategies and processes for facilitating engagement is essential for the effective delivery and exploitation of world-class research. The REF should give significant weight to the benefits of a research-intensive institutional environment which drives excellence across a range of disciplines. We therefore believe that in the 2013 REF, environment should be weighted at least on a par with impact.

- We understand that HEFCE does not wish to use the proportion of staff submitted as a factor in assessing quality. However, to ensure that the REF underpins the government's objectives of supporting and protecting the UK's strongest, world-leading centres of research, some recognition of research intensity should be introduced into the assessment process. We therefore recommend that critical mass should be specifically addressed within the environment element rather than being optional. We recognise that critical mass will have different meanings within different UoAs and suggest that the panels should determine the appropriate definitions and criteria for critical mass within a common framework set down by HEFCE to ensure consistency of approach. Additionally, we request that HEFCE give consideration to the use of quality and volume thresholds in combining the quality sub-profiles into the overall quality assessment.
- We recognise that there is a trade-off between having a robust REF methodology and operating an effective assessment model which minimises the burden on institutions and panel members. Whilst we welcome many of HEFCE's suggestions for minimising this burden we believe that it is essential that assessment is based upon 4 outputs per researcher (without special circumstances) rather than 3 in order to maintain the robustness of, and confidence in, the REF and its outcome.

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.

2.1 The proposal to simplify the assessment by tightening the definition around category C staff in the non-medical disciplines is helpful. We would also like HEFCE to revisit and further clarify the definitions of eligible staff. In particular, we believe that eligibility should be defined by the role undertaken, rather than by the wording in an employment contract. Eligible staff should be those for whom research is a primary responsibility, and who undertake significant independent research which makes a significant contribution to the submitting unit. Teaching staff should only be eligible only where they meet these criteria rather than by default. We welcome HEFCE's initiative in hosting a workshop about staff eligibility to inform the REF.

- 2.2 The use of citation indicators may help to inform the assessment of outputs in certain disciplines and we agree that it should be for the UoA panels to determine whether and how to make use of such data.
- 2.3 As the REF consultation document states, the primary focus of the REF is to identify and assess excellent research of all kinds. Whilst we recognise the imperative to reduce the burden on submitting institutions and those involved in the REF, the outcomes will be used to inform the allocation of several billion pounds of public funds. It is therefore essential that the assessment process draws upon a sufficiently large body of evidence to give the sector, government, and tax-payers confidence in the rigour of the process. We strongly believe that a reduction from a maximum of four outputs per researcher to three would undermine this confidence. It also has the potential to make it more difficult to discriminate between the very best research at the 4* and 3* levels – which we believe is essential. Coupled with this, we support suggestions for the sampling of outputs, and whilst panels should determine the proportion of outputs they would wish to review in detail, there should be a clear expectation that a majority of outputs will be reviewed.
- 2.4 We would like HEFCE to look at the potential duplication between the use of “significance statements” in the output assessment and impact assessment. If “significance statements” are to be used, we believe that these should be limited to specific UoAs where a panel believes that this is necessary to assess user significance (paragraph 40). We ask that the REF guidance makes it clear in which disciplines such statements will be needed and indicate that statements must be based upon verifiable evidence, which will be audited if necessary.
- 2.5 There is a case for double weighting outputs in some UoAs, particularly in the humanities, to recognise the production of major outputs such as books, monographs, or films which may encompass many years of work. Where double weighting is used, clear criteria should be devised and included in the guidance to institutions on submissions to the REF. In addition, such criteria must be consistently applied across all of the UoAs within any one main panel area. We do not believe that it is acceptable for the different UoAs under one main panel to adopt separate approaches to double weighting. In addition, we believe that all researchers should submit 4 outputs regardless of whether one (or more) of them may be doubled weighted in the assessment process.
- 2.6 We believe that a decision on whether or not to double weight an output should be taken before the quality of that output is assessed. We do not believe that it is valid to automatically double weight certain kinds of outputs or to assign double weighting post-hoc on the basis of the quality assessment. We suggest that the criteria used to determine whether an output should be double weighted or not should be based upon the amount of time and effort taken to produce the output.
- 2.7 We suggest that institutions should be required to identify in their submissions which outputs they would like to be considered for double weighting. Institutions should be required to indicate a rank order amongst the 4 outputs submitted. If a decision is taken by the panel to double weight a particular output then that ranked lowest on the list submitted should be excluded from the rest of the exercise.

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.

3.1 As the recipients of substantial volumes of QR funding, Russell Group universities are well aware of their responsibilities in ensuring that the outputs from their research are disseminated widely across the academic sector and beyond, and that efforts are made to ensure that this research ultimately has an impact – whether this be on teaching, society, culture or the economy. Whilst the REF should recognise and reward a variety of different kinds of excellent research, it should not seek to shift research or research funding towards more applied work, or give this perception. It is important that the REF encourages researchers to consider and pursue effective means for exploiting their research whilst avoiding perverse incentives which could discourage novel, unorthodox, or high-risk research which may not have any impact beyond the academic world for decades to come.

3.2 HEFCE should clarify what constitutes “impact” and how this differs from the assessment of “significance” under the research outputs component of the REF. Based on the experience of the impact pilot projects, HEFCE should develop and issue clear advice about the definition of “impact” and give a range of examples. HEFCE should also explain how it will handle research which has both short-term significance (as assessed under output quality) and short-term impact (as assessed under impact), whether such information will be used twice.

3.3 As is recognised in the consultation, there are significant challenges to be overcome in developing and introducing an element of impact assessment into the REF. The main challenges are:

- **Assessing whether impacts are based on excellent research:** First and foremost, the Russell Group believes that impact assessment must be explicitly linked to research activity and research excellence. The consultation gives a welcome reassurance that the REF will examine “impacts built on excellent research” (paragraph 53a). However, there needs to be a way to enable the panel to verify that the impact statements and case studies submitted are based on excellent research. Means of addressing this should be tested via the impact pilots
- **Attribution:** as recognised in the consultation, the exploitation of research is non-linear, often happens over a long period of time, and involves multiple organisations and individuals many of whom are beyond the influence of the original researchers or their institutions. HEFCE should develop clear guidance for institutions about what

“the research-driven contribution of the submitted unit to the exploitation of the research” means in practice and how such efforts relate to, and differ from, institutional knowledge transfer activities which are funded by means other than QR e.g. HEIF.

Impacts must be rooted in the research portfolio of the submitting unit i.e. it is not acceptable for a third-party institution to be able to take someone else’s excellent research, carry out non-research activity to exploit this (e.g. collation of research findings) and then be able to claim the impact as part of its REF submission. This is essential to ensure that the REF and the subsequent allocation of QR funding continue to recognise and reward excellence in research rather than excellence in knowledge transfer or public engagement.

HEFCE will need to consider how to apportion impacts arising from collaborative research and consortia where several institutions may claim the same impact, but where different partners will have contributed more or less to the underpinning research and to efforts to ensure impact.

- **Time lag:** the proposal to consider the impacts of research from a submitting unit over a “sufficiently long time frame” is welcome. However, the suggested period of “10-15 years” (para 62) is insufficient. A number of studies have shown that the period from research to impact can often be in excess of 20 years. For example, the recent MRC, Wellcome Trust, and AMC funded study “Medical Research: What’s it Worth?” found that the time from research to impact for cardiovascular disease treatments is between 10 and 25 years, with an average estimate of 17 years. A 2005 study from the American Council for Chemical Research found that the lag between public funding of chemistry research to the first commercialisation of a new technology is 20 years. Given the very considerable degree of unpredictability around the exploitation of research and need to continue to encourage researchers to pursue long-term, novel research, it would be preferable that there is no time limit set on the period from which underpinning research is drawn, and the each panel is given the flexibility to determine what might be appropriate in each discipline.

If there is a requirement to include a specific time period, we recommend that the period is set for at least 20 years from the date on which the research was completed. HEFCE will, of course, need to look at ways of ensuring that whilst the same impacts are not rewarded a second time under a future REF exercise, that legitimate advances and new impacts are recognised and rewarded appropriately.

- **Corroboration:** corroboration of impacts is essential. HEFCE should test how this might be achieved via the impact pilots, and introduce a light touch means for corroborating impacts to help build confidence in the impact assessment process. Guidance on this should be provided to expert groups, including advice on how to corroborate claims if there is insufficient expertise amongst the panel membership.

3.4 The consultation states that users will include “people with experience in commissioning and using research – in businesses, the public and third sectors” (paragraph 87). Identification and recruitment of appropriate user representatives will be critical. HEFCE should publish guidance about the range of skills and experience it is looking for from its user experts and explain how individuals will be selected from

those nominated.

- 3.5 HEFCE should provide a clearer indication of how impact will be assessed, drawing upon the impact pilots. We believe that impact assessment, like the other components of the REF, must be based upon peer review. This peer review should be informed by the views of a sufficiently broad and representative range of expert users. HEFCE will also need to put in place safeguards to address potential conflicts of interest and to avoid undue influence from individual user representatives.
- 3.6 We have concerns about the volume of work likely to be involved in the assessment of impact submissions. For example, if HEIs provide one case study for every five FTE submitted this would equate to around 890 impact statements and case studies in the engineering UoA. Given that impact assessment is being introduced for the first time it will be important to evaluate the bulk of the evidence submitted, and to demonstrate that a sufficiently broad group of expert users have been consulted to enable a realistic judgement to be formed about the reach and significance of the impacts.
- 3.7 Additionally, we have concerns about the suggestion in the consultation (paragraph 71) that any user could play a part in peer reviewing the quality of research outputs. The assessment of research outputs should be undertaken by individuals with sufficient in-depth expertise of the disciplines being evaluated. Whilst all users will bring a unique and valuable perspective to the assessment process, not all will have the necessary level of expertise to evaluate research outputs. HEFCE should provide clear guidance on this point.
- 3.8 The proposed impact statement and case studies template are welcome. These templates, and the proposed menu of impact indicators, should be refined in light of practical experience from the impact pilots. In particular, further thought will be needed about public engagement activities, which should be encouraged, but which by themselves do not constitute impact.
- 3.9. The consultation suggests that information about processes for engaging with users (including public engagement), the range of interactions with users, and “evidence of a continuing flow of activity to secure future impact” is included within the impact assessment element as part of the “impact statement”. However, similar information is also requested as part of the proposed template on the research environment. It does not seem sensible to ask for this information twice, in potentially two different formats. HEFCE should clarify whether information about engagement with users forms part of the impact assessment or the environment assessment.
- 3.10 It is difficult to comment on the proposed impact assessment criteria and definitions for impact sub-profiles in the absence of clearer information about how impact assessment is likely to work in practice. There should be a further opportunity for the community to comment on this once the impact pilot projects have been undertaken.

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

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| 4.1 | It is important that the REF gives due recognition to a high-quality research environment and the plans in place for its future development, as well as continuing to give recognition to activities undertaken by researchers which contribute to the vitality of their field nationally and internationally. We strongly support the retention of indicators of esteem in the REF. |
| 4.2 | As indicated above, further clarification is needed about the treatment of information on engagement with users and potential users. |
| 4.3 | Information about research income should be included in the “resourcing” part of the research environment. This should clearly distinguish between income won on a competitive basis, whether through peer review or competitive tender, and income awarded on a non-competitive basis because competitively awarded funding is a more robust indicator of the quality of the research environment. We propose that only the volume of competitively awarded research income should be used in the assessment of the research environment. |
| 4.4 | A consideration of critical mass should be included in the environment assessment. In view of the government’s statements in the HE Framework about the need to maintain and enhance a research base made up of world-class multidisciplinary institutions which support a critical mass of leading researchers and state of the art facilities, we believe that this should be a mandatory rather than an optional part of the assessment. However, we recognise that what constitutes “critical mass” will vary substantially by discipline and recommend that individual panels should agree what might be expected to constitute a critical mass for each UoA within a common framework set down by HEFCE to ensure consistency of approach. This should include resources (including research income and PGRs), facilities, interdisciplinary engagement, and the research programme within each discipline. |
| 4.5 | We support the proposed measures for the inclusion of PGR data and request that this includes information about “market share” in each UoA as well as gross numbers. |

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.

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| 5.1 | The REF is fundamentally about incentivising research excellence, driving up quality and supporting and encouraging innovative and curiosity-driven research. The REF will inform the allocation of public funding for research, as opposed to knowledge transfer or other HE activities. The Russell Group therefore believes that it is essential that the overall assessment profile is weighted heavily towards the quality of research outputs. We would wish to see the weighting given to the output assessment to increase from 60% to 70%. |
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- 5.2 Whilst we agree that a decision about the final weighting between outputs, impact and environment should only be taken in the light of experience gained from the impact pilots, we believe that the risks associated with introducing impact assessment at 25% are too high.
- 5.3 Firstly, we believe that it is important that the REF continues to encourage the evolution of the research base and incentivise the creation of new research groups, departments and collaborations. As impacts are specifically associated with the originating research group (submitting unit), introducing impact at 25% carries the risk of driving behaviours which reinforce the status quo and stifle the growth of new research groups and partnerships.
- 5.4 Secondly, impact assessment is a new and untested component of the REF, and an area where there is no pre-existing, robust measurement methodology. Whilst the pilot projects should go a considerable way to exploring and addressing the theoretical and practical challenges of developing and using impact assessment, these cover only 5 UoAs and outputs from this exercise are by no means certain. Also, the REF schedule is such that there will only be a short period of reflection about the outputs of the pilot projects before institutions have to start preparing their submissions. In order to manage more effectively the risks associated with introducing a new and potentially destabilising element into the REF and to help build the community's confidence in impact assessment, we believe that impact should be introduced at a level of no more than 15% maximum in the first REF. This should be accompanied by a commitment to review the relative weighting of impact in subsequent REF exercises, in the light of practical experience.
- 5.5 Consideration should be given to the use of combined quality and volume thresholds in creating the quality sub-profiles into the overall quality assessment.
- 5.6 We note that a final decision will not be taken on the process for combining the three elements until after the impact pilots have been completed. We believe that there should be a further opportunity to comment on the proposed methodology at this point.
- 5.7 Whatever method is adopted, HEFCE should be cognisant of how the outcomes will be viewed by potential partners and students outside of the UK. If the introduction of impact assessment results in an across the board decrease in relative quality compared to the RAE 2008 this potentially damages the international reputation of UK HE.

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.

- 6.1 The Russell Group supports HEFCE's efforts to improve the consistency of the REF assessment process compared to the 2008 RAE, share workloads more evenly, and

reduce the potential for games playing. As such we agree with the principle of a substantial reduction in the number of UoAs and panels from the 67 used in the 2008 RAE, as well as the proposed reduction in number of main panels.

6.2 However, all sectors of the academic community need to be confident that their research will be assessed by peers with sufficient expertise to do so. As such, 30 UOAs may be too few, and HEFCE should give due consideration to views from the engineering, social sciences, and arts and humanities communities who, in particular, have concerns about the detail of the proposed panel configuration.

6.3 Whatever the final configuration of UoAs and panels it will be essential to remove options about which UoA to submit research to i.e. all research should only fall within the scope of one UoA.

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

7.1 The Russell Group believes that it is important to establish more consistent policies and processes between panels to reduce the opportunities for games playing which can arise when institutions have the scope to choose between UoAs for some areas of research. We fully support the efforts by HEFCE to increase consistency in the REF process, whilst recognising the need for flexibility in handling some disciplines. We endorse the recommendations for a reduction in the number of UoAs and panels, the standardisation of many aspects of the assessment process, production of clear guidance for panels about the discretion they have, and the use of international benchmarked standards and international panel members.

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.)

8.1 We do not wish to suggest any other organisations

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?

9.1 Research is increasingly interdisciplinary, both within and across UoAs. It is important that the REF methodology treats interdisciplinary research on the same basis as other kinds of research, and that interdisciplinary research is no less likely to be awarded the highest quality rating.

9.2 We therefore welcome the proposals to include an assessment of support for interdisciplinary research and collaboration within the environment element, and the measures for handling interdisciplinary submissions within and across UoA panels.

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?

10.1 We are content with the proposals for encouraging researcher mobility.

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

11.1 The Russell Group welcomes the proposed measures to promote equality and diversity within the REF.

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

12.1 The proposed timetable is extremely challenging with several critical pinch points. Firstly, it will be important to ensure that there is sufficient time to fully analyse and reflect upon the responses from this consultation exercise, before any guidance is issued about the format and operation of the REF.

12.2 Secondly, whilst a series of impact pilot projects is absolutely necessary to test and refine the impact assessment methodology, the timetable allows for only a small window between the completion of the pilots and the launch of the REF proper. Sufficient time must be allowed so that the lessons learned from the pilots can inform the assessment methodology and be incorporated into the guidance to institutions on making submissions to the REF. It is vital that the academic community is involved in this process to build confidence in the impact assessment method. .

12.3 HEFCE will need to employ rigorous project management to achieve the desired outcomes on the timescale proposed. There should be close monitoring of the impact pilots, both to provide regular feedback to the rest of the HE community about the lessons learned by the institutions involved, and to ensure that these lessons are built into the evolving REF methodology and guidance as early as possible.

12.4 Thirdly, the time allowed for consultation with the academic community about assessment criteria and the finalisation of assessment criteria appears shorter than that employed in previous RAE exercises. There are concerns that this may not provide institutions with sufficient time to prepare and make their submissions in 2012.

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

13.1 The Russell Group accepts that a certain level of burden to institutions is necessary to maintain the confidence of the community, government and other stakeholders in the validity and effectiveness of the REF.

13.2 It is likely that the introduction of impact assessment in the REF will increase the

burden on HEIs and this should be recognised. As indicated above, the Russell Group does not support a reduction in the number of outputs from four to three because we believe that this would compromise the robustness of the REF process.

13.3 It is likely that there will be a significant increase in burden on HEIs as a result of the introduction of impact assessment. We encourage HEFCE to look at ways of streamlining this component of the REF during the impact pilots, and when reflecting on the outcomes from the impact pilot exercise.

13.4 The burden on the sector could be reduced by increasing the interval between subsequent REF exercises, or interspersing a comprehensive REF exercise (for example held every 10 years) with more light-touch interim review (e.g. every 5 years).

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

14.1 This response represents the considered, collective view of the Russell Group recognising that some institutions may take different positions on specific points of detail.