

RSB response to the consultation on the draft

Guidance on submissions & Panel criteria and working methods for REF2021

15 October 2018

The RSB has responded to a consultation issued by the UK Higher Education Funding Bodies about the [Research Excellence Framework \(REF\) 2021 panel criteria and working methods](#). This document, alongside the [Guidance on submissions](#) also published in draft for consultation, has been developed by the REF expert panels and will provide a comprehensive description of the information required in submissions to the REF, and how the REF panels will assess submissions. The final Panel Criteria and Working Methods and the Guidance on submissions documents will be published in early 2019.

Q2. Please provide the name of your organisation.

The Royal Society of Biology

Q3. If you would be happy to be contacted in the event of any follow-up questions, please provide a contact email address.

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Q4. If your response is in relation to specific main panels, please indicate which one(s):

Main Panel A: Medicine, Health and Life Sciences (Sub-Panels 1-6)

Q5. We are seeking views during the consultation on both the draft guidance on submissions and the draft panel criteria and working methods. Please select the documents for which you would like to provide a response:

Both documents

Guidance on submissions: Part 2: Submissions

Q7. 2a. The guidance is clear in 'Part 2: Submissions':

Agree

2b. Please provide any comments on Part 2. (Indicative 300 word limit)

RSB members highlighted concerns about paragraph 68 in the UOA3 (Allied Health Professions, Dentistry, Nursing and Pharmacy) descriptor which states: "Bodies of research more explicitly linked to UOA 1 (Clinical Medicine), UOA 2 (Public Health, Health Services and Primary Care), UOA 4 (Psychology, Psychiatry and Neuroscience), UOA 5 (Biological Sciences), and UOA 6 (Agriculture, Food and Veterinary Sciences) should be submitted to those panels and such outputs submitted to UOA 3 will be cross-referred." This is a departure from 2014 and will concern a number of institutions that their biomedical or clinical research might be bounced from UOA3. Cross-referral makes it more difficult to get consistency in the rating of outputs within a sub-panel and we would therefore caution

Q7. 2a. The guidance is clear in 'Part 2: Submissions':

against widespread cross-referral that could result here. Related to this concern, for UOA3, we recommend appointing a pharmacologist on this sub-panel to correctly deal with some of the pharmacology-related material and to avoid wholesale movement of areas of discipline moving between units.

Q10. 5a. Do you agree with the proposed eligibility of seconded staff set out at paragraphs 121.c to d?

Other (please specify):

5b. Please provide any comments on this proposal. (Indicative 300 word limit)

See point 6b

Q11. 6a. Do you agree with the proposed ineligibility of staff based in a discrete department or unit outside the UK?

Other (please specify):

6b. Please provide any comments on this proposal. (Indicative 300 word limit)

We urge the Funding Councils to reconsider the proposed exclusion of researchers based outside the UK from REF2021. The UK has a long history of international research partnerships, especially in the life sciences, and the growing Global Challenges Research Fund is a commitment to further increasing these links in the years ahead. Researchers based overseas make a significant contribution to the quality of research within their UK employer institution, and to the UK research community more generally. They help bring front-line experience to research projects, forge wider partnerships for UK-based colleagues, and connect the UK with the research data and outputs of partner nations. Excluding these researchers from REF2021 could send a signal that such contributions are not valued, and risks reducing the focus on this work on the basis of assessment criteria rather than contribution. Including overseas researchers also justifies the route through which GCRF Quality-Related (QR) funding is disbursed. Allocations are pegged to the mainstream QR funding received by institutions, so REF performance dictates the flow of GCRF QR via proxy. To ensure that incentives are consistent with funding allocations, overseas researchers should have an opportunity to contribute to their institution's REF performance. While we support the drive to streamline the REF process, reduced administrative burden should not come at the expense of the ability to assess research excellence in all its forms. The lack of HESA data covering overseas researchers should not dictate their inclusion in REF2021, and the necessary data might be delivered through working in partnership with institutions. Such data would also provide additional benefits by better quantifying the scale of the UK's international research presence.

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

Q12. 7a. The proposed approach for taking account of circumstances will achieve the aim of promoting equality and diversity in REF 2021:

Agree

Please provide any comments on your answer. (Indicative 300 word limit)

Some of our members commented that Staff Circumstances have moved to a more operational method of adjustment relative to the previous REF, but there is still a judgement call. They would agree that the proposed approach is suitable but would not strongly agree.

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

Q15. 8a. The guidance in 'Part 3, Section 2: Research outputs' is clear:

8b. Please provide any comments on Part 3, Section 2. (Indicative 300 word limit)

RSB members suggested that Part 3, Section 2 should be more explicit (e.g., define 'Decoupling').

Q16. 9. A glossary of output types and collection formats is set out at Annex K, to provide increased clarity to institutions on categorising types of output for submission. Do you have any comments on the clarity and usefulness of this annex? (Indicative 300 word limit)

We recommend, alongside some of our member organisations, that:

- Impact on health and welfare of animals (including those used in research) is mentioned in Table 1, under areas of impact, but should also be included in the text.
- Refinement should be included as an example of type of impact in the second column of Table 1. Currently, only Reduction and Replacement are mentioned.
- In Table 1, p 103 should include animal science in the list of impact examples under 'public policy'.

Q17. 10a. Paragraph 206.b sets out the funding bodies' intention to make ineligible the outputs of former staff who have been made redundant (except where the staff member has taken voluntary redundancy). Do you agree with this proposal?

Other (please specify):

10b. Please provide any further comments on this proposal. (Indicative 300 word limit)

We have received comment from our members which indicates concern over the intention to make ineligible the outputs of former staff who have been made redundant. In some circumstances this could be to the unfair detriment of both institutions and researchers (this is with due consideration to how this decision might usefully prevent a scenario where an institution could make a redundancy and benefit unfairly from the work of researchers). In a minority of cases, such as where institutions have lost external funding and have had to make enforced redundancies as a result, institutions should be able to make the best strategic return (potentially involving redundant research staff) to help ensure future funding and be REF-returnable for the researchers involved. We do note, however, that according to the current draft Guidance on submissions, outputs are not portable, but, if an eligible former member of staff generated an eligible output before they left the institution then this may be submitted in the pool of outputs for that institution. The RSB proposes that further clarity is provided in the Guidance on Submissions, to explain in greater detail how outputs from

Q17. 10a. Paragraph 206.b sets out the funding bodies' intention to make ineligible the outputs of former staff who have been made redundant (except where the staff member has taken voluntary redundancy). Do you agree with this proposal?

redundant researchers should be handled as part of REF submission, and how such submissions will be assessed.

Q18. 11a. Do you agree with the proposed intention to permit the submission of co-authored outputs only once within the same submission?

Other (please specify):

11b. Please provide any comments on this proposal. (Indicative 300 word limit)

We have received comment from our members which indicates concern that the above proposed intention could have a sizeable negative impact on the extent and development of collaboration within the same higher education institution. For example, it has been suggested that this would discourage translational research that could be submitted into multiple UoAs for different co-authors such as UoA1 and UoA4/5, preventing one or other expert from being able to demonstrate their contribution to the research. We do note, however, that supplementary criteria are given in paragraphs 221-226 (pages 52-53) of the Panel Criteria and Working Methods, for how Main Panels will assess co-authored outputs, which allow for double-weighting requests to be submitted. We also note that there are differences between Main Panel A and B in requirements for the minimum number of authors involved in a study, and the types of contribution that require additional information to be submitted for REF assessment. Some of our members have also expressed concern that paragraph 224 of the Consultation on the draft panel criteria and working methods document puts too much emphasis on the output acknowledgements in papers rather than the author contribution supporting statements submitted by researchers. This is significant because if a paper did not explicitly say that Researcher A did X then Researcher A's output acknowledgement statement may not be sufficient evidence to have their contribution recognised under REF. This is of particular concern to some of our members because despite the fact their research might be crucial in generating an output they may not be lead authors so it might be difficult to capture their contribution in publications with 10 or more authors.

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

Q22. 13a. The guidance in 'Part 3, Section 3: Impact' is clear:

13b. Please provide any comments on Part 3, Section 3. (Indicative 300 word limit)

The RSB supports the eligibility of continued impact case studies for submission to REF2021 in recognition of longer lead-in time for impacts of research projects whose initial scientific groundwork was done (often long) before the impact could be assessed. This groundwork may take place sometime before it is first cited as impact as part of submissions to REF, and, since many impacts can be long-term, they should be monitored and incorporated through subsequent assessments. Clearly one possibility is that the impact of research may continue for some time, and can expand or increase - this should be accounted for. Some of our members commented that the timings over which the impacts and underlying research are considered and assessed seem appropriate; however there may be exceptional circumstances, which should be justified. In their view the number of impact statements is appropriate.

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

Q24. 15a. The guidance in 'Part 3, Section 5: Environment' is clear:

15b. Please provide any comments on Part 3, Section 5. (Indicative 300 word limit)

Environment is problematic in terms of the research income data. For example, if a submission to a given sub-panel comes from an institute that focuses mainly on lab-intensive projects using expensive technologies, the income may well be higher than another department that does less costly research but classified within the same UoA. This must be a judgement call of the panel.

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

Q32. 3c. Please comment on the criteria in 'Part 3, Section 2: Outputs', in particular on:- the proposed criteria for double-weighting outputs in Main Panels C and D, and on whether requests to double-weight books should automatically be accepted- whether Annex C 'Main Panel D – outputs types and submission guidance' is helpful and clear - where further clarification is required- where refinements could be made- whether there are areas where more consistency across panels could be achieved- whether there are differences between the disciplines that justify further differentiation between the main panel criteria. Where referring to particular main panels, please state which one(s). (Indicative 300 word limit)

Our members have flagged the widely-held position that citation-based indices such as H index, which derives from citations, are inherently biased as they depend on networks and other academics being sufficiently aware of a colleague's research to cite them. This disproportionately affects those researchers with smaller networks or in more niche areas of academic study.

In light of the above, the RSB recommends that the panel assessment criteria and working methods (PCWM) and Guidance on submissions specify in more detail the format of the citation data and bibliographic analysis, and how this will be used in assessment by Main Panel A – to avoid potential biases such as those described.

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

Q35. 4c. Please comment on the criteria in 'Part 3, Section 3: Impact', in particular on:- where further clarification is required- where refinements could be made- whether there are areas where more consistency across panels could be achieved- whether there are differences between the disciplines that justify further differentiation between the main panel criteria. Where referring to particular main panels, please state which one(s). (Indicative 300 word limit)

Our members are concerned about a lack of harmonisation between Main Panel A and B in the types of indicator (qualitative versus quantitative) accepted to evidence impact. Another critical area of concern is whether any impactful pedagogical research would be assessed as part of a submission to Main Panel A and count towards the final discipline-specific result. By encouraging submissions outside of the UoA of relevance (e.g. from UoA5 to UoA23), REF assessment might actively discourage any pedagogical research in the life sciences, because it would not count as an output nor be evidence for impact, putting REF at odds with the aims of the Teaching Excellence Framework. We wonder how biology-specific pedagogical research will be rated if Main Panel A does not receive it and/or bioscientists do not submit it to UoA23, because they may be indirectly de-incentivised to do so.

Q35. 4c. Please comment on the criteria in 'Part 3, Section 3: Impact', in particular on:- where further clarification is required- where refinements could be made- whether there are areas where more consistency across panels could be achieved- whether there are differences between the disciplines that justify further differentiation between the main panel criteria. Where referring to particular main panels, please state which one(s). (Indicative 300 word limit)

A process of cross-referral to another panel would not act to entirely solve this issue, unless submission and assessment of pedagogical research, regardless of discipline, is fully enabled. In educational research there are matters related to pedagogical process and matters related to discipline-specific content. In order for both content and delivery to be fully appraised, both subject specialists and educational specialists should jointly evaluate the research and any generated impact.

The assessment of impact on production should value the involvement of industry partners from the earliest stages of a research project to allow for maximal pull-through into product development, commercialisation and patient benefit, for example. The proper assessment of interdisciplinary research will be key in this context.

Some of our members have continuing and long-term engagements with government departments and policy makers about agenda setting activities. They are keen to understand how REF will capture and measure long-term expert engagement and its impact in building a supportive environment.