

# REF 2021 consultation on the draft guidance and criteria

## Page 2: Respondent details

Q1. Please indicate who you are responding on behalf of:

Other (please specify):

Q2. Please provide the name of your organisation.

Royal Historical Society

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

vice-presidentjm@royalhistsoc.org

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

Main Panel D: Arts and Humanities (Sub-Panels 25-34)

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 We are seeking views during the consultation on both the draft guidance on submissions and the draft panel criteria and working methods.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

## Page 3: Guidance on submissions: Part 1: Overview of the assessment framework

Q6. 1a. The guidance is clear in 'Part 1: Overview of the assessment framework':

Agree

## Page 4: Guidance on submissions: Part 2: Submissions

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

Neither agree nor disagree

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

The guidance is clear in itself, but it fails to provide sufficient detail on the operation of the Interdisciplinary research advisory panel (IDAP). In particular, more guidance is required on the utility and significance of

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

flagging submitted items as interdisciplinary in para 105. Institutions will want to know what 'good' looks like – will it be in their interests to flag work as interdisciplinary, and if so, will that create perverse incentives to favour interdisciplinary research, or research that can be so badged? If the process for cross-referral is to remain separate from the operation of IDAP, then what precisely is the role of IDAP in the assessment process? The Society agrees with the principles of fair and equal assessment of all forms of research and outputs set down in 103, but it is unclear as to how IDAP will deliver this.

## Page 5: Guidance on submissions: Part 3, Section 1: Staff details (REF1a/b)

Q8. 3a. The guidance is clear in 'Part 3, Section 1: Staff details':

Neither agree nor disagree

### **3b. Please provide any comments on Part 3, Section 1. (Indicative 300 word limit)**

The criteria are clear. The audit procedures for ensuring that those returned as independent researchers fit these criteria are less so. The guidelines appear to imply that this will be addressed through the review of the Code of Practice. Is this sufficient? The requirement to demonstrate substantive connection to the submitting institution (paras 123-4) is welcome and the criteria appropriate. Requiring this to be documented up to 0.4fte would reduce the danger of institutions simply treating the proposed 0.3 threshold as the 'new normal' for such fractional contracts.

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

**Other (please specify):**

See 5b

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

The Society agrees with the principles set out in 121.c and d. It is unclear as to why the time limitation of two years is necessary, provided there is clear provision for a return to the submitting HEI. This constraint might prevent HEIs, mindful of REF regulations, from allowing members of staff to take longer periods of secondment that could yield high quality outputs, to the detriment of individual careers and UK research.

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

**Other (please specify):**

see 6b

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

The Society accepts the need to avoid the inclusion of individuals who have no substantive connection to the UK research unit, and do not benefit from its resources. In view of the probable emergence of hybrid institutional research structures post-Brexit, it may be valuable to require that staff based outside the UK entered for REF should be eligible for PI status on a UKRC grant application to be held at the submitting HEI.

## Page 6: 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:

Strongly disagree

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

The Society finds the approach to E&D issues, and to special circumstances, fundamentally flawed. Special circumstances and E&D are not the same issue, nor is one a subset of the other. The current guidelines risk reducing E&D both within unit submissions, and across research careers. This stems from the decision to ignore Stern's recommendation that decoupling the linkage between outputs and individuals required the submission of all unit members with responsibility for research, irrespective of submission for REF of any of their outputs. This had three advantages over previous exercises: relieving the stresses imposed on researchers experiencing special circumstances; reducing the burden on institutions to collect intrusive information about, and make selection decisions based upon, those circumstances; and eliminating bias (conscious or unconscious) in recruiting staff to research positions based upon assumptions about how their circumstances and characteristics might affect their contribution to REF submission, irrespective of the quality of their research. The proposed system reintroduces these moral hazards. Researchers will feel pressurised to produce not just 1, but at least 2.5 outputs of sufficient quality to be included in the final pool for submission, and mask any circumstances that might prevent them from doing so. Managers may be (unconsciously) biased against hiring researchers who might require special circumstances such as carers. They may feel pressured to game the system by aggressively requiring staff to assert special circumstances to obtain reductions in unit submissions. Researchers may limit their life choices – including the decision to start or add to families – to ensure sufficient time to produce the requisite number of quality outputs. Retaining the link between individuals and outputs in the manner proposed here will therefore likely act to the detriment of researchers with protected characteristics under the Equality Act 2010 (specifically age, pregnancy and maternity, and sex).

Q13. 7b. The potential advantages of the proposed approach outweigh the potential drawbacks identified:

Strongly disagree

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

Humanities practitioners generate lower numbers of outputs over the course of the research cycle relative to STEM and social sciences. Many work towards the production of long form monographs in which (as REF2014 subpanel reports confirm), high calibre research is disproportionately concentrated. Such projects often require more than one research cycle to complete. Any interruption to practitioner's capacity to research therefore has a substantial impact on the quantity and volume of outputs available for submission. The proposed qualifying periods for a reduction in tariffs are insufficiently generous in this regard. Furthermore individuals are often incapable of performing significant research for longer periods than their actual absence from employment (for example, being unable to visit archives or undertake fieldwork while breastfeeding). The ERC uses a formula of 18 months per maternity leave when calculating researchers' eligibility for early career grants. Paras 174-175 of the Guidelines relating to combined circumstances, however, do not even make it clear if a period of parental leave taken while an ECR will increase the number of months over which a reduction in outputs will be calculated, or be subsumed into a single concurrent circumstance. The pressures on other colleagues in a UoA will increase significantly if tariffs for calculating the overall reduction of unit outputs to be submitted do not adequately reflect the disruption to the productivity of affected researchers. Units in Main Panel D are usually smaller than A-C further increasing such burdens, and fostering circumstances that may result in discrimination and bias. We therefore propose that the total documented period of special circumstances required for an individual to be allowed to be returned to the REF without any outputs be reduced from 46 months to 36 (or fewer) months and that the other tariffs be pro-rated accordingly

Q14. 7c. Please provide any further comments on these proposals, including any suggestions for clarifying or refining the guidance. (Indicative 300 word limit)

Simplifying the provisions around maternity leave so that a researcher could be returned with no submitted outputs after a single period of maternity leave, and that each period of leave carried a reduction of 1 rather than 0.5 outputs to the overall unit submission, would remove the danger of fostering

Q14. 7c. Please provide any further comments on these proposals, including any suggestions for clarifying or refining the guidance. (Indicative 300 word limit)

a climate favouring indirect discrimination against young women in the workplace. It would also significantly reduce the administrative burden upon institutions to carry out complex and intrusive calculations around special circumstances.

The most effective way of protecting the position of researchers with special circumstances would be to require submitting HEIs to include a declaration in their Codes of Practice as to whether the number of outputs ascribed to an individual in the submission will play a role in its retention or promotion policies, and, if so, how this will be handled in light of their obligations to individuals with protected characteristics under the Equalities Act of 2010.

This will enable units to submit their highest quality outputs, preserving the focus on research excellence, as opposed to research assessment, which drove the introduction of REF, and which Stern sought to extend. They could use their Environment Statements to explain how they had fostered Equality and Diversity at local level, which would, of course, be subject to audit.

## Page 7: Guidance on submissions: Part 3, Section 2: Research outputs (REF2)

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

Neither agree nor disagree

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

Para 195 states that the decoupling of staff and outputs in the submission is intended to provide increased flexibility to institutions in building the portfolio of outputs for submission, and that it is not expected that all staff members will be returned with the same number of outputs. It also requires institutions to apply principles of equity to output selection which should be documented in the Code of Practice. Para 196, however, assigns the policing of E and D to the sub-panels receiving the submission and ask them to judge, if equity has been achieved, on the basis of a contextualised distribution of the numbers and percentage of submitted category A staff, former staff, and ECRs. These two paragraphs are contradictory, contrary to the spirit of the REF and create significant procedural complications. The logic of decoupling as described in para 195 is that the unit's production of outputs can be strategically managed as a collective responsibility. Para 196, however, implies that the distribution of the production of outputs by individual staff within the submission should form part of the sub-panel's assessment. Para 196, complicates the flexibility offered in para 195. There is no clarity as to what the optimum outcome looks like. As well as making it very difficult for unit leaders to decide how to pursue the goal of research excellence, it also assigns the responsibility for ensuring Equality and Diversity to sub-panel members who were selected for their expertise at assessing research quality, not the effectiveness of equal opportunities strategies. The contrast between the elaborate structures introduced to support interdisciplinary research and the crude mechanisms created to ensure Equality and Diversity within submissions (notwithstanding protection of persons with protected characteristics is mandated by the Equality Act 2010 and NI equivalent legislation) is striking.

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)

Annex K will be valuable for unit leaders wishing to explain their choice of output forms to senior research managers. It would be enhanced by a statement that all forms of output arising from research activities corresponding to the REF definition of research, will be considered of equal merit a priori, and will be evaluated solely on the basis of their quality, irrespective of format.

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):**

Agree on redundancy exclusion, disagree voluntary redundancy inclusion

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

When an HEI declares staff are redundant, it does so on the basis that it has determined it is no longer in the interests of the institution to invest in the relevant unit, subject area, or sub-field. Given that REF is principally used as a tool for the allocation of QR funding in the next research cycle, it makes no sense for HEIs to be funded on the basis of research in areas that they will no longer support. This remains true whether the redundancies are compulsory or voluntary. It has become standard practice for universities to offer enhanced voluntary redundancy terms to ensure the swift closure of such units/areas/sub-fields. Unfortunately there have also been a number of instances where redundancies have rapidly been followed by new hires in similar areas, of junior, cheaper, staff. We therefore believe that submissions should not incorporate any outputs from unit members who have been made redundant via either compulsory or voluntary routes. This would remove the temptation for managers to replace one set of staff with another, or of obtaining funding based upon outputs in a field from which the university has withdrawn. We would also exclude work from individuals dismissed by the university for other reasons, in order to avoid creating incentives to use this as an alternative strategy to redundancy.

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

No

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

This proposal runs counter to the principles of equity – why should a collaborative output be available for use by two researchers across different units within the same institution, or from two different institutions, but not two researchers in the same home unit? This problem is particularly acute in the Humanities disciplines such as History that are represented in Main Panel D, and generate relatively few outputs over the course of a cycle. Disadvantaging such collaborations would be inimical to the development of strategic appointments and research structures within a unit, and hence counter to the principle of promoting research excellence. The need to avoid gaming the generation of outputs within a unit submission is probably best addressed through use of requirements to identify the nature and significance of the contribution of each named author of the output.

## Page 8: Guidance on submissions: Part 3, Section 2: Research activity cost for UOA 4

Q19. 12a. How feasible do you consider to be the approach set out at paragraphs 267 to 271 for capturing information on the balance of research activity of different costs within submitting units in UOA 4? (Indicative 300 word limit)

n/a

Q20. 12b. Are the examples of high cost and other research activity sufficiently clear to guide classification? (Indicative 300 word limit)

n/a

Q21. 12c. Please provide feedback on any specific points in the guidance text as well as the overall clarity of the guidance. (Indicative 300 word limit)

n/a

## Page 9: Guidance on submissions: Part 3, Section 3: Impact (REF3)

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

Neither agree nor disagree

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

The criteria are largely consistent with, or a logical development upon, those employed in REF2014. The Society however notes: i) Given the increased value of impact case studies in the final research profile, it seems sensible to increase the word limits for the impact description section of the template from 750 to 1250 words. A single case study may well contribute 12.5% of the total unit profile, and it is vital that sub-panels can reach informed judgements upon these. ii) More clarity is required about the definitions, parameters and evidencing of impact studies based on bodies of work produced over a number of years as referred to in para 318b. What is the status of bodies of research that began to be produced prior to January 2000, but have continued to accumulate thereafter? iii) The introduction of impact upon higher education teaching practice is welcome, but the inclusion of impact solely upon students at the submitting institution creates the danger that impacts may be exaggerated by 'coached' responses that form part of the evidence supplied. What ethical guidelines will govern collection of the supporting data? It would be sensible to require impact beyond the submitting HEI. iv) It is vital to further highlight the statement within para 312c) that the relationship between research and impact can be indirect or nonlinear. This is intrinsic, for example, for many impacts resulting from research co-production. v) There is no rationale for informing sub-panels that impact case studies are continuing. Sub-panels should form their own judgements about the impact of the research without the potentially distorting biases that might be introduced by such knowledge

## Page 10: Guidance on submissions: Part 3, Sections 4-5: Environment data and environment (REF4a/b/c-REF5a/b)

Q23. 14a. The guidance in 'Part 3, Section 4: Environment data' is clear:

Agree

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

Neither agree nor disagree

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

More clarification is needed on paragraph 364. Is EDAP providing an analysis of the data by unit to the sub-panels, or by HEI? What will be the nature of the calibration exercise to be conducted by EDAP across the sub-panels, and how will it inform their judgements? In this regard it should be noted that not only is unit level analysis likely to be unreliable for small units, which are disproportionately represented in Main Panel D; it is also the case that within and across institutions, there are frequently discrepancies in equality and diversity at main panel level, as indicated in the Royal Historical Society's report Race, Ethnicity & Equality in UK History: A Report & Resource for Change (October 2018).

## Page 12: Panel criteria and working methods: Part 2: Unit of assessment descriptors

Q26. 1. Do the UOA descriptors provide a clear and appropriate description of the disciplines covered by the UOAs? Please include any suggestions for refining the descriptors and state which UOA(s) you are commenting on.

UOA 28: History

**Where relevant, please state which UOA(s) you are commenting on.**

UoA28 History - add 'rural history' given that 'urban history' is already listed.

## Page 13: Panel criteria and working methods: Part 3, Section 1: Submissions

Q27. 2a. Overall, the criteria are appropriate in 'Part 3, Section 1: Submissions':

Agree

Q28. 2b. Overall, the criteria are clear in 'Part 3, Section 1: Submissions':

Agree

## Page 14: Panel criteria and working methods: Part 3, Section 2: Outputs

Q30. 3a. Overall, the criteria are appropriate in 'Part 3, Section 2: Outputs':

Agree

Q31. 3b. Overall, the criteria are clear in 'Part 3, Section 2: Outputs':

Agree

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)

The Society welcomes the statement in para 239 that 'it is expected that most books, monographs, novels or longer-form outputs warrant double-weighting, although claims will not automatically be accepted'. It agrees that double weighting should be requested, not automatically applied to all books. This is both because of degree of variance of the research input into long-form outputs, and the need to take into account any overlap between sections of books and articles/chapters by the submitted author. It agrees that any type of output should be eligible for double-weighting, with no automatic privileging of one type over another.

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)

Clarification of the ways in which the sub-panels will handle requests for double-weighting of co-authored long form outputs is required. Failure to articulate these principles clearly will be perceived as unfairly privileging UoAs with staff members serving on REF sub-panels, and erode sector-wide confidence in REF assessments. This was witnessed in REF 2014 when submitting institutions employed significantly different approaches to requesting double-weighting depending on their interpretation of the published Panel Criteria and Working Methods.

## Page 15: Panel criteria and working methods: Part 3, Section 3: Impact

Q33. 4a. Overall, the criteria are appropriate in 'Part 3, Section 3: Impact':

Agree

Q34. 4b. Overall, the criteria are clear in 'Part 3, Section 3: Impact':

Neither agree nor disagree

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)

Sub-panels should be guided to read the sections on impact strategy within the Environment template in conjunction with the case studies (and vice-versa), and the links between the two should be clarified in the submission. This is stated in para 336 dealing with REF 5b) but ought to also be highlighted in the Impact sections of the document.

The guidelines suggested at para 292 relating to public scrutiny could usefully be extended to Main Panel D.

## Page 16: Panel criteria and working methods: Part 3, Section 4: Environment

Q36. 5a. Overall, the criteria are appropriate in 'Part 3, Section 5: Environment':

Agree

Q37. 5b. Overall, the criteria are clear in 'Part 3, Section 4: Environment':

Neither agree nor disagree

Q38. 5c. Please comment on the criteria in 'Part 3, Section 4: Environment', in particular on:- whether the difference in section weightings across main panels is sufficiently justified by disciplinary difference (paragraphs 322 and 323)- whether the list of quantitative indicators provided at [www.ref.ac.uk](http://www.ref.ac.uk) is clear and helpful- 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 key area of concern for Main Panel D is that of open access. The requirement in para 336 that the submitting unit illustrate how it is progressing towards an open research environment, including where this goes above and beyond the REF open access policy requirements, is one that the Guidelines rightly recognise it will be very difficult for MPD units to demonstrate: open access monograph publication is in very early stages of development compared to journal publication in the UK. The Book Processing Charge model of monograph OA poses substantial challenges to Early Career Researchers and smaller UoAs, and has not been subjected to an Equalities audit. The alternative approaches outlined in para 337 are vague and more likely to distinguish between units on the basis of the type of research they undertake rather than the quality of outputs this generates. There is a danger that these will be judged on narratives rather than objective outcomes, and, as such, subject to gaming.

The proposed difference in section weightings for Main Panel D on the basis of the importance of People is justified.

We would also suggest a 5% increase in Strategy at the expense of Collaboration and Contribution to the Discipline, not just in Main Panel D, but across all panels. The primary reason for this is that impact strategy is now included in the Unit Strategy section of the Environment Template, whereas it was previously assessed separately. Units need to develop effective strategies to maximise the impact of all their research (not just the case studies). The importance of impact strategy therefore needs to be recognised in the Environment template weightings.

Collaboration and Contribution to Discipline category has always been problematic to assess, and is often believed to favour well-established units. The desire expressed in the guidance to move submissions on from mere listing is valuable, but will take time to bed in.

For Main Panel D, therefore, we would therefore prefer a weighting of Strategy 30%, People 30%, Income 20%, Collaboration 20%.

## Page 17: Panel criteria and working methods: Part 4: Panel procedures

Q39. 6a. Overall, the criteria are appropriate in 'Part 4: Panel procedures':

Disagree

Q40. 6b. Overall, the criteria are clear in 'Part 4: Panel procedures':

Disagree

Q41. 6c. Please comment on the criteria in 'Part 4: Panel procedures', in particular on:- where further clarification is required or where refinements could be made. (Indicative 300 word limit)

Para 342 states that units should discuss the selection and spread of outputs submitted by the unit in relation to Equality and Diversity. This threatens to a) re-introduce the linkage between individuals and outputs and b) raises the question of what is 'good'. Sub-panels simply will not have appropriate evidence on which to assess these claims.

It is unclear how the procedures outlined here marry to those in para 364 of the Guidance on Submissions relating to the work of EDAP.

It must be an absolute priority that any identification of outputs with individuals in this section should be avoided, which will be extremely difficult to do in the context of the small units typical of submissions to Main Panel D.

## Page 18: Panel criteria and working methods: Part 5: Panel working methods

Q42. 7a. a. Overall, the criteria are appropriate in 'Part 5: Panel working methods':

Neither agree nor disagree

Q43. 7b. Overall, the criteria are clear in 'Part 5: Panel working methods':

Agree

Q44. 7c. Please comment on the criteria in 'Part 5: Panel working methods', in particular on: - where further clarification is required or where refinements could be made. (Indicative 300 word limit)

To generate confidence in the process a statement that some form of moderation of the assessment of outputs will always be conducted within the sub-panels is necessary. This is the most frequently raised issue about panel working methods.

## Page 19: Overall panel criteria and working methods

Q45. 8a. Overall, the 'Panel criteria and working methods' achieves an appropriate balance between consistency and allowing for discipline-based differences between the panels.

Agree