

CONSULTATION SUBMISSION

REF 2028 Consultation

Dr Andrew Jones, Head of Policy

06 October 2023

LINK TO CONSULTATION DOCUMENT QUESTIONS:

<https://engagementhub.ukri.org/re-research-policy/ref2028-for-further-consultation/>

VOLUME MEASURES

The funding bodies propose to draw staff data directly from HESA to calculate the volume measure, using an average staff FTE over Academic Years (AYs) 25/26 and 26/27 (piloted in AY 24/25) (Annex A, paragraphs 4-7).

Question 5:

What practical challenges may institutions face in implementing these changes?

To maintain data accuracy and keep it up-to-date, it will be necessary to allocate time and resources for the inclusion of any new codes and UoAs. It is anticipated that the administrative burden will increase significantly, particularly for smaller institutions within the MillionPlus group to ensure the curation of data through the reporting years for HESA rather than at a year-end for a census date. Despite it being clearly stated in the decision document that Codes of Practice are not expected to be rewritten, some members think this will be unavoidable and this process will be demanding. However, the lack of clarity surrounding these changes leaves institutions uncertain about whether this path will indeed become necessary. MillionPlus institutions also express reservations about the inflexibility of the system, primarily the need to assign staff to UoAs well in advance of the submission date, which reduces flexibility. Flexibility is required to ensure you can assign UOA based on the outputs and impact selected for that specific UOA, as some outputs and impact can support multiple UOAs. Clarity is another concern, especially regarding scenarios where an individual is contracted with multiple institutions or how averages are calculated for staff on short-term contracts.

Question 6:

How might the funding bodies mitigate against these challenges?

The anticipated increase in administrative burden resulting from these changes is expected to impact MillionPlus members more significantly than other types of HEIs. However, precise estimates of this additional burden remain challenging due to the lack of clarity in certain areas. Consequently, it is important that funding bodies provide greater clarity as soon as possible to assist institutions in effectively planning for future changes. Enhanced clarity in the near future will also serve to mitigate the temptation for 'gaming' the system by certain institutions, such as the recruitment of staff with a high number of outputs on part-time contracts. While the exemption for small disciplinary areas is appreciated, the removal of some flexibility in

the process poses a risk to interdisciplinary research that does not neatly align with a specific UoA. One potential solution to address this concern could involve implementing exemptions that encompass interdisciplinary research.

Question 7:

What would be the impact of these changes on individual researchers and particularly those with protected characteristics or other underrepresented groups?

MillionPlus members do not believe that the changes would impact individual researchers. Our institutions have robust processes to help mitigate any potential impact on groups. However we do believe that some of the other proposals do impact upon individual researchers.

OUTPUT SUBMISSION

The funding bodies propose to fully break the link between individual staff members and unit submissions (Annex A, paragraphs 12-18).

Question 8:

What would be the impact of these changes on individual researchers and particularly those with protected characteristics or other underrepresented groups?

MillionPlus largely supports the intention to decouple individual staff members from unit submissions. MillionPlus recognises that the elimination of a minimum requirement for outputs would help ease pressures on staff members who have taken career breaks, such as parental leave, assumed caring responsibilities, or experienced ill health. Historically, these individuals faced undue pressure to produce outputs during such circumstances, and these changes will help alleviate this burden. However, keeping the minimum output requirement of one ensures that institutions still have the responsibility to support individuals in their research. Further to this, not requiring staff reductions will streamline administrative processes, reducing the overall workload.

However, there is a degree of ambiguity concerning how members will be expected to demonstrate that their submitted output pool adequately represents the research conducted within their disciplinary area. This poses significant challenges for interdisciplinary research that does not neatly align with a specific UoA. To address this issue, it is essential to establish greater clarity and provide a clearer definition of 'representative' in this specific context.

Additionally, the current proposal of allowing submissions from staff on fractional fixed-term contracts carries the risk of institutions with substantial budgets 'buying in' staff with high-impact outputs. Such a practice could negatively impact researchers who have taken career breaks, including those with protected characteristics. It is imperative to prioritize the prevention of a 'transfer market' for high-output researchers to ensure a fair and equitable environment for all.

Question 9:

What impact would these changes have on institutions in preparing output submissions? For example, what may be the unintended consequences of allowing the submission of outputs produced by those on non-academic or teaching-only contracts?

The proposed changes to research output submission criteria, specifically the inclusion of outputs from non-academic or teaching-only contracts, raise concerns among MillionPlus members. They advocate for recognizing research responsibilities in staff contracts to avoid placing undue expectations on individuals without protected research time. Some members perceive these changes as a lack of understanding of modern university academic careers.

Furthermore, these changes could inadvertently promote unsupported research. Many MillionPlus institutions offer internal research support exclusively to staff with research contracts, excluding technicians or teaching-only staff. Consequently, non-research staff may face pressures to publish without adequate support, potentially compromising research output quality—counter to the goal of enhancing research excellence. There is also concern around the exploitation of staff, in that if they have research outputs that they have produced in their own time and on a contract that does not require them to do this activity then it could be seen that the HEI is reaping the benefits of that individual whilst not allocating appropriate time for the endeavor.

Many universities, including MillionPlus institutions, maintain distinct promotion pathways that recognize excellence in teaching, external engagement, innovation, and research. These pathways empower staff to align their career goals with their strengths and allow flexibility for career development adjustments. However, the proposed REF changes could restrict this flexibility by mandating universities to identify research-focused staff annually in HESA returns. The likely outcome may be an increase in teaching-only contracts, limiting the career development opportunities that benefit early-career staff.

Furthermore, the requirement for all staff involved in research, regardless of their level of involvement, to be submitted to the REF may discourage universities from encouraging staff to excel in teaching or external engagement. This could undermine staff working conditions and career development. The proposal of maintaining the current SR4R arrangements and not requiring all staff involved in research to be submitted is welcomed by MillionPlus. This is important for preserving the flexibility in academic career development that benefits staff, universities, and students. Ultimately, the aim of REF changes should be to enhance the academic community's well-being, rather than potentially limiting career options and forcing individuals into teaching-only contracts.

Question 10:

Should outputs sole-authored by postgraduate research students be eligible for submission? If so, should this include PhD theses?

On the surface, adding postgraduate work like PhD theses to the assessment seems like a good idea. However, MillionPlus members believe that few postgraduate researchers typically produce work entirely on their own. This makes us wonder how much it will really change the overall output. At the same time, this change could make postgraduate researchers feel even more pressure to publish, which goes against the reforms aimed at improving how we treat people in research. So, safeguards need to be in place to protect the time postgraduate researchers need for their training.

Question 11:

What would be appropriate indicators of a demonstrable and substantive link to the submitting institution?

MillionPlus members are seeking clarification regarding the decision to include staff employed on a minimum 0.2FTE contract for at least 6 months in REF submissions. Specifically, we would appreciate clarity on whether only outputs generated during a staff member's employment at an institution can be submitted, or if outputs over the entire assessment period are eligible.

The shift away from using a census date, as was the case in REF21, has introduced some confusion into the REF28 process. Additionally, members are keen to understand the implications when the same staff member is concurrently employed at multiple institutions on part-time contracts. We believe that without clear regulations in place, there is a substantial risk of 'gaming' the system. Of particular concern is the practice of research-intensive universities with sizable research budgets recruiting staff with high-impact outputs on a 'research transfer market' and subsequently submitting 100% 4* submissions. Clarity and defined rules are essential to ensure fairness and integrity in the assessment process.

Question 12:

Do the proposed arrangements for co-authored outputs strike the right balance between supporting collaboration and ensuring that assessment focuses on the work of the unit?

MillionPlus is supportive of this move.

Question 13:

Are there any further considerations around co-authored outputs that need be taken into account?

None

IMPACT CASE STUDIES

The funding bodies propose to reduce the minimum number of impact case studies required to one. They also propose to revise the boundaries, including splitting the lowest boundary (Annex A, paragraph 33-37). The funding bodies are particularly keen to hear the views of institutions with small units.

Question 14:

What will be the impact of reducing the minimum number to one?

In general, MillionPlus universities endorse the decision to limit the number of impact case studies to one, considering it a positive step forward. This change enables the inclusion of more intricate narratives in submissions and alleviates some of the administrative and financial burdens associated with the prior approach. However, there is a valid concern that certain disciplines, especially those involving complex interdisciplinary research teams, may not be adequately represented by a single impact case study. This raises the potential for a misleading portrayal of research in these fields.

Question 15:

What will be the impact of revising the thresholds between case study requirements?

MillionPlus has concerns regarding the adjustment of thresholds for case study requirements, as it could potentially deter the submission of local and regional impact case studies. It is crucial to acknowledge the influence that institutions have on their local communities and economies when assessing research. As anchor institutions, MillionPlus universities play a pivotal role in making substantial contributions to their local areas and regions, and there's a risk that these contributions might go unnoticed under the proposed changes.

Question 16:

To what extent do you support weighting the impact statement on a sliding scale in proportion to the number of case studies submitted?

MillionPlus believes that the suggested changes will relieve larger institutions of a more significant burden than smaller ones. For example, applying the new thresholds to REF 2021 FTE data would have caused Russell Group universities, which are relatively well-funded, to submit an average of 16 fewer case studies. In contrast, the smaller and less well-funded Million Plus and University Alliance institutions would have seen their case study workload reduced by less than 3 on average. This unequal distribution allows larger institutions to submit only their highest-impact case studies, leading to a disproportionate allocation of funding due to the higher rating for 4* research.

Question 17:

If the UOA structure is relevant to you/your organisation, please indicate clearly any changes that you propose to the UOA structure and provide your rationale and any evidence to support your proposal.

There are no plans to change the UoA structure.

Question 18:

What is your view on the proposed measures to take into account the impact of the Covid pandemic?

None

Question 19:

What other measures should the funding bodies consider to take into account the impact of the Covid pandemic?

None

Question 20:

What positive or adverse effects will the proposals have on opportunities for persons to use the Welsh language and treating the Welsh language no less favourably than the English language?

MillionPlus is supportive of this change.

Question 21:

Could the proposals be changed to increase positive effects, or decrease adverse effects on opportunities for persons to use the Welsh language and treating the Welsh language no less favourably than the English language?

None.