

CONSULTATION SUBMISSION

REF 2028: Assessment of people, culture and environment

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MillionPlus, The Association for Modern Universities, broadly welcomes the direction of the proposed changes to the assessment of people, culture and environment (PCE) for REF 2028. However, we have significant concerns that the pace and nature of changes risk further entrenching inequities across the HE sector.

This response sets out the opportunities presented, implementation challenges foreseen, and suggested mitigating actions to ensure a fair transition that values progress made across all institution types.

OPPORTUNITIES TO RECOGNISE EXPANDING EXCELLENCE

The proposed changes align with wider efforts by modern universities to promote diverse perspectives, accessibility, and community-engaged research. They have pioneered new programs, partnerships, and mechanisms to widen participation and embed inclusive values in research.

For example, many MillionPlus member institutions have created systems to improve connections between industry and academia. Interdisciplinary centres tackling local issues through engaged partnerships are now common. Widening participation for disadvantaged groups strongly features in research plans, while inclusive governance gives voice to students and staff.

The proposed reforms present an opportunity to recognise the progress modern universities have made in building open and inclusive research cultures while increasing their world-leading research. However, the proposed tightly-defined questionnaire format poses several risks.

There is a risk that excellence in people, culture and environment will be defined in relation to an “ideal type” i.e. large, research intensive institutions. Without greater context from case studies, this risks further embedding existing funding and reputational advantages in future assessments.

Likewise, a cross-sectional questionnaire presents a static picture of the current research landscape. This would make it difficult for modern universities, including those affiliated to MillionPlus, to demonstrate their growth in research outputs and improvements to research culture over previous cycles. Meanwhile, larger, research intensive institutions may have remained static but would still continue to benefit from this lack of context.

MillionPlus suggests adopting a tailored definition of excellence that appreciates different institutional missions, specialties and contexts. Evaluating progress made, rather than immediate status, is essential for acknowledging advances in PCE.

CONCERNS AROUND PACE OF CHANGE

MillionPlus’s primary concern is the scale and speed of changes within a single REF cycle. Such rapid shifts may benefit institutions with existing resource advantages and doctoral-focused models. In contrast, those making recent progress risk having their efforts undervalued by new expectations.

Improvements have required cultural change and investments balanced against other strategic priorities. Enhancing research capacity relies on securing talent, partnerships and infrastructure over sustained periods. MillionPlus universities have reached their current environment quality from a low starting point with many expending great effort and resources in establishing initial footholds in specific areas or newly formed groups.

Rapid changes risk diminishing the gains secured despite countervailing pressures. Gradual change over 1-2 additional cycles would allow consolidation to continue at a measured, sustainable pace. We recommend avoiding dramatic changes that could let the research resource gap between institutions expand.

CHALLENGES OF DATA-DRIVEN ASSESSMENT

MillionPlus welcomes responsible data use in assessment but have reservations about over-reliance on metrics or questionnaires. These offer context-free snapshots that struggle to capture starting points or progress. Data-driven approaches often embed existing inequities by capturing resource differences rather than balanced judgments of underlying health or sustainability.

In particular, the use of metrics prioritise a move to an ideal rather than measuring the diversity of progress relative to different missions. They often benefit those institutions with substantial research resources while missing achievements at smaller institutions that required great effort, leadership and more inventive use of resources.

Standardised data collection also imposes disproportionate bureaucratic burdens that disadvantage less-resourced institutions. It is also important that metrics adhere to established principles around transparency, diversity and proportionality. Crucially, they should sit within – not drive – a rich qualitative narrative appreciating institutional strategy, mission and context. In recognition of the disproportionate administrative burden, word limits should be imposed on the narratives. This would allow pressures, priorities, and progress to be factored into assessments. Responsible data use should support, not replace this judgment.

SUGGESTED ACTIONS TO ENSURE FAIR TRANSITIONAL APPROACH

MillionPlus urges the following actions to mitigate risks of embedding unfairness during this transitional period:

- Articulate clear definitions of “environment”/“culture” recognising diverse institutions (not just proximity to research-intensive archetypes)
- Phase enhancements over additional 1-2 cycles, avoiding dramatic change over a single period
- Include word-limited qualitative elements that recognise context and distance travelled
- Tailor expectations around metrics/questionnaires to moderate burden differences across institutions
- Ensure criteria appreciate varieties of culture/progress relatable to institutional mission and context
- Recognise wider forms of developing research capacity e.g professional doctorates, external partnerships

Provided there is equitable treatment during changes, MillionPlus welcomes the expanded focus on inclusive, healthy research cultures and real-world impacts. This aligns closely with our member institutions values and efforts to drive systemic improvements in research participation. Our suggested actions would enable a fair transition toward rewarding cultural excellence wherever it exists across the higher education sector.