

REF 2021 consultation on the draft guidance and criteria

Introduction

Responses to this consultation are invited from any organisation, group or individual with an interest in the conduct, quality, funding or use of research.

If you would like to save a copy of your response, please choose 'print response' on the last page of the survey. We regret that we won't be able to accommodate requests to download and send individual responses submitted.

Following the deadline, the REF team will copy responses to the Department for the Economy, Northern Ireland, the Higher Education Funding Council for Wales, Research England and the Scottish Funding Council. Responses will also be copied to the panel secretariat for the purposes of analysis. A summary of responses and, where requested, a copy of responses will be provided to the expert panels.

The funding bodies will be holding consultation events for HEIs during the consultation period. The events will outline the questions and proposals, and will provide an opportunity for institutions to raise any issues for clarification and discussion. HEIs across the UK may register up to two delegates each across all of the events. Details of these activities are available at www.ref.ac.uk, under Events.

The responses to this consultation will be considered by the funding bodies and by the REF panels during late 2018. The final 'Guidance on submissions' and 'Panel criteria' will be announced in early 2019.

We will commit to read, record and analyse responses to this consultation in a consistent manner. For reasons of practicality, usually a fair and balanced summary of responses rather than the individual responses themselves will inform any decision made. In most cases the merit of the arguments made is likely to be given more weight than the number of times the same point is made. Responses from organisations or representative bodies with high interest in the area under consultation, or likelihood of being affected most by the proposals, are likely to carry more weight than those with little or none.

We will publish an analysis of the consultation responses. We may publish individual responses to the consultation in the summary. Where we have not been able to respond to a significant material issue, we will usually explain the reasons for this.

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Additionally, all responses may be disclosed on request, under the terms of the relevant Freedom of Information Acts across the UK. The Acts give a public right of access to any information held by a public authority, in this case the four UK funding bodies. This includes information provided in response to a consultation. We have a responsibility to decide whether any responses, including information about your identity, should be made public or treated as confidential. We can refuse to disclose information only in exceptional circumstances. This means that responses to this consultation are unlikely to be treated as confidential except in very particular circumstances. For further information about the Acts see the Information Commissioner's Office website, www.ico.gov.uk or, in Scotland, the website of the Scottish Information Commissioner www.itspublishknowledge.info/home/

For further information relating to UK Research and Innovation's Privacy notice, please visit <https://www.ukri.org/privacy-notice/>

Respondent details

Please indicate who you are responding on behalf of: *

- As an individual
- Business
- Charity
- Department or research group
- Higher Education Institution
- Public sector organisation
- Representative body
- Subject association or learned society

X Other (please specify):

Professional Regulator & Registered Charity

Please provide the name of your organisation. *

Association for Nutrition

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

I.milliner@associationfornutrition.org

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

- X Main Panel A: Medicine, Health and Life Sciences (Sub-Panels 1-6)
- Main Panel B: Physical sciences, Engineering and Mathematics (Sub-Panels 7-12)
- Main Panel C: Social Sciences (Sub-Panels 13-24)
- Main Panel D: Arts and Humanities (Sub-Panels 25-34)

Relevant to all

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:

- x Both documents
 Guidance on Submissions only
 Panel Criteria and Working Methods only

Guidance on submissions: Part 1: Overview of the assessment framework

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

- x Strongly agree
 Agree
 Neither agree nor disagree
 Disagree
 Strongly disagree

1b. Please provide any comments on Part 1. (300 word limit)

Para. 33c Research Environment – explicit reference should be made to principles of equality and diversity (in line with the 'general principles' of the REF) in terms of sustaining and assessing the 'vitality and sustainability' of the research environment.

We would also argue that Research Environment should also acknowledge the professional responsibilities of research/ academic staff who are also regulated professionals (whether statutorily or voluntarily regulated). The impact of professional regulation upon the research environment and the behaviour, performance and ethical accountability of academic research active staff is an important consideration in assessing the culture and effectiveness of the Research Environment. Criteria for Research Environment should include recognition of the additional responsibilities of category A staff who are Registered Nutritionists, who support the broader agenda of protecting and benefiting the public through their professional registration with an independent regulator, which, for Registered Nutritionists, is the Association for Nutrition.

Guidance on submissions: Part 2: Submissions

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

- x Strongly agree
 Agree
 Neither agree nor disagree
 Disagree
 Strongly disagree

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

The guidance here is clear and unambiguous.

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

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

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

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

No comment

4. Possible indicators of research independence are set out at paragraph 130, including a reference to a list of independent fellowships. This list is intended to guide institutions on determining independence for staff holding fellowships from major research funders. The list is not intended to be comprehensive. Do you have any comments on the clarity, usefulness, or coverage of this list? (300 word limit)

No comment

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

Yes

No

Other (please specify):

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

We agree this new method for eligibility of seconded staff will allow staff to contribute to both organisations fairly and in accordance with their allocated time spent at the individual organisation.

However, we would argue the rationale for not including those with contracts with less than 0.2 FTE is unclear. The contribution of research staff with a contract of less than 0.2 FTE should be calculated in a similar manor as the secondment scenario.

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

Yes

No

Other (please specify):

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

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

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

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

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

AfN strongly supports provision within the REF to support Category A staff combine caring and research responsibilities, and processes to apply for a reduction in eligible output seem fair and proportionate. Care must be taken that institutions do not reduce Category A staff contracts to below 0.2 to avoid inclusion in the REF, or other forms of 'game playing.'

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

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

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

Please see comment above regarding the potential for some institutions to use 'game playing' to position their Category A staff onto the most advantageous teams.

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

No comment

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

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

- Strongly agree
 Agree
 Neither agree nor disagree
 Disagree
 Strongly disagree

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

No comment

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?

No comment

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?

- Yes
 No
 Other (please specify):

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

No comment

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

- Yes
 No
 Other (please specify):

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

No comment

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

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? (300 word limit)

No comment

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

No comment

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

No comment

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

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

- Strongly agree
 Agree
 Neither agree nor disagree
 Disagree
 Strongly disagree

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

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

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

- Strongly agree
 Agree
 Neither agree nor disagree
 Disagree
 Strongly disagree

14b. Please provide any comments on Part 3, Section 4. (300 word limit)

No comment

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

- Strongly agree
 Agree
 Neither agree nor disagree
 Disagree
 Strongly disagree

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

No comment

Guidance on Submissions: further comments

16. Please provide any further comments on the 'Guidance on submissions', including Annexes A-M. (500 word limit)

We have a significant level of concern regarding the definitions used to describe attainment at each of starred levels (Annex A, Page 101.)

It would be advisable to more clearly define what will be considered as “world leading” (4 star) as opposed to “internationally excellent” (3 star) so that external users of the REF results (public, regulators, commissioners, staff & students) can more clearly delineate achievement between the two highest levels of recognition.

We also note that the three star descriptor of includes the following negative statement, ‘which falls short of...’ and is at odds with the descriptors of four star and two stars, which contain entirely positive statements without reference to the other descriptors. We would argue that it would be better to rephrase the description of three star research quality as, ‘Quality that is internationally excellent in terms of originality, significance and rigour’ with a further definition of what might be classed as

“internationally excellent” (3 star) in comparison to “world leading” (4 star)

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

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.

- All
- X UOA 1: Clinical Medicine
- x UOA 2: Public Health, Health Services and Primary Care
- x UOA 3: Allied Health Professions, Dentistry, Nursing and Pharmacy
- UOA 4: Psychology, Psychiatry and Neuroscience
- X UOA 5: Biological Sciences
- X UOA 6: Agriculture, Food and Veterinary Sciences
- UOA 7: Earth Systems and Environmental Sciences
- UOA 8: Chemistry
- UOA 9: Physics
- UOA 10: Mathematical Sciences
- UOA 11: Computer Science and Informatics
- UOA 12: Engineering
- UOA 13: Architecture, Built Environment and Planning
- UOA 14: Geography and Environmental Studies
- UOA 15: Archaeology
- UOA 16: Economics and Econometrics
- UOA 17: Business and Management Studies
- UOA 18: Law
- UOA 19: Politics and International Studies
- UOA 20: Social Work and Social Policy
- UOA 21: Sociology
- UOA 22: Anthropology and Development Studies
- UOA 23: Education
- UOA 24: Sport and Exercise Sciences, Leisure and Tourism
- UOA 25: Area Studies
- UOA 26: Modern Languages and Linguistics
- UOA 27: English Language and Literature
- UOA 28: History

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- UOA 29: Classics
- UOA 30: Philosophy
- UOA 31: Theology and Religious Studies
- UOA 32: Art and Design: History, Practice and Theory
- UOA 33: Music, Drama, Dance, Performing Arts, Film and Screen Studies
- UOA 34: Communication, Cultural and Media Studies, Library and Information Management

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

Nutrition is a unique profession, underpinned by research which spans both human and animal science at individual and population level. It is a distinct profession with its own independent professional regulator (Association for Nutrition) and learned society (Nutrition Society). As the independent professional regulator we (Association for Nutrition) regulate two professional titles 'Registered Nutritionist' and our graduate title, 'Registered Associate Nutritionist.'

The proposed UOA descriptors include significant overlaps of five UOAs (1, 2, 3, 5 and 6) by either implicit or explicit reference to nutrition. Whilst the overlap gives researchers a choice of UOA into which they may submit, it does not assist the profession or those funding or benefiting from nutrition science research in identifying excellence in the body of research as a whole, or its use or impact for public benefit by the profession. Nor does it help the REF meet its intended outcome (para 22f) to provide benchmarking information and establish reputational yardsticks, for use within the HE sector and for the public. Our preference would be a single UOA which reflected the full scope of nutrition research, in public health, in food, food service and agriculture, in sports and exercise, healthcare, nutrition science and across animal systems. A single UOA would align nutrition with NSS, QAA benchmark statement and the TEF, where nutrition is uniquely identifiable as a single discipline, and allow better comparators of performance by the public and across the HE sector.

In the absence of such a single UOA which captures the breath of research activity in nutrition, our comments are as follows;

UOA 3 It would be helpful if UOA 3 in the first sentence of the descriptor made explicit reference to nutrition, as follows; '...includes research into all aspects of the disciplines of allied health professions, nutrition, dentistry, nursing, midwifery, and pharmacy. Nutrition is a health-related profession. As its professional regulation sits outside the remit of the HCPC (Allied Health Professions) it is upfront and explicit listing will make clear, along with the mention of 'nutritional sciences' in the second paragraph, of the inclusion of nutrition within this UOA as a professionally-focused discipline, bound by professional standards and a common ethical code. UOA 2 – Due to the interdisciplinary nature of nutrition research it is likely there will be a high degree of cross-over between UOA 3 and UOA 2 (Public Health). Recognition of the long-term, public health impact of nutrition within the descriptor for UOA 2 would be helpful to the panel in determining scope here. We are happy to assist with redrafting to ensure clarity, if that would assist.

UOA 6- para 75.b Consideration should be given to including reference to animal nutrition in para 75b. as follows; 'Submissions may include research relevant to normal and abnormal function of animals, their health, behaviour, welfare, nutrition and productivity, as well as their role in human health and society...' Animal nutrition is an important part of veterinary and animal research, and a significant focus of a Registered Nutritionist's research, with cross over to public health (UOA 2) and Food (UOA 6).

UOA 6 Food – para 75c. We agree with the reference to human nutrition, diet and health alongside food as described in para 75c. but question how this sits alongside the additional inclusion of nutrition in UOA 2, 'nutritional sciences' and with UOA 2 Public Health.

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

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

- X Strongly agree
 Agree
 Neither agree nor disagree
 Disagree
 Strongly disagree

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

- X Strongly agree
 Agree
 Neither agree nor disagree
 Disagree
 Strongly disagree

2c. Please comment on the criteria in 'Part 3, Section 1: Submissions', 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). (300 word limit)

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

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

- X Strongly agree
 Agree
 Neither agree nor disagree
 Disagree
 Strongly disagree

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

- X Strongly agree
 Agree
 Neither agree nor disagree

- Disagree
 Strongly disagree

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). (300 word limit)

Given the proportion of Registered Nutritionists who are female (83%) is encouraging to see that equality and diversity considerations are firmly taken into account. We support this direction of travel, and consider it an important step forward to ensure recognition of the research activity of all sectors of society.

We support the proposal that co-authored outputs is deemed as substantive.

The inclusion of reviews and textbooks if they embody research is welcomed for this REF submission, as well as new technologies and digital artefacts.

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

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

- X Strongly agree
 Agree
 Neither agree nor disagree
 Disagree
 Strongly disagree

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

- x Agree
 Neither agree nor disagree
 Disagree
 Strongly disagree

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). (300 word limit)

We note guidelines are indicated for presenting quantitative data. We would argue that more recognition and guidance of the contribution gained with regard to the qualitative evidence could be offered to support and complement quantitative data where appropriate.

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

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

- X Strongly agree
 Agree
 Neither agree nor disagree
 Disagree
 Strongly disagree

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

- X Strongly agree
 Agree
 Neither agree nor disagree
 Disagree
 Strongly disagree

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 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). (300 word limit)

Panel criteria and working methods: Part 4: Panel procedures

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

- X Strongly agree
 Agree
 Neither agree nor disagree
 Disagree
 Strongly disagree

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

- X Strongly agree
 Agree
 Neither agree nor disagree
 Disagree
 Strongly disagree

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. (300 word limit)

Panel criteria and working methods: Part 5: Panel working methods

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

- X Strongly agree
 Agree
 Neither agree nor disagree
 Disagree
 Strongly disagree

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

- X Strongly agree
 Agree
 Neither agree nor disagree
 Disagree
 Strongly disagree

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. (300 word limit)

Overall panel criteria and working methods

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

- X Strongly agree
 Agree
 Neither agree nor disagree
 Disagree
 Strongly disagree

8b. Please comment on the balance between consistency and allowing for discipline-based differences between the main panels. (300 word limit)