

REF 2028: Initial Decisions Consultation

06 October 2023

Opening Comment

The [initial decisions on the next Research Excellence Framework](#), REF 2028, were published in June. The first consultation considered the fundamental elements of the proposal and structure of the assessment including:

- Calculating the volume measure - i.e. the number of staff as a proxy for the size of a research environment - and using HESA data to do so;
- Breaking the link between individuals and outputs, thus moving the assessment towards the way institutions support research overall;
- Recalibrating the expectations for demonstrating impact through Impact Case Studies and redrawing thresholds for quantities required;
- Proposed retention of existing Units of Assessment;
- Effective capturing and acknowledgement of the impact of Covid;
- Supporting the Welsh language - a mandatory question for HEFCW.

Colleagues were invited to contribute to our response and subsequently gathered for a roundtable with Research England. Key points include:

- Members are concerned about the use of HESA data and how late in the assessment process they will know their accurate volume measure;
- Due to the changes in the exercise and the development of their own research environments, institutions expect to need to revisit their Codes of Practice, and that this anticipated relief on bureaucracy and burden is unlikely to be realised in practice;
- Deep concern that underrepresented groups will be further marginalised by the break between individuals and outputs; we ask for clarity on how this will be mitigated in the People, Culture and Environment submission;
- A mixture of relief that very small units of fewer than 10 FTE will submit just one impact case study, and concern that narrative statements will carry a great deal of importance for overall scores
- A plea to balance out inequities in the Units of Assessment to improve parity of esteem between disciplines
- A sense of urgency to issue guidance on these fundamentals, and a request to either review the timeline of submissions by 2027 or stagger proposed changes to enable effective implementation of the policies.

Below is appended our full response.

Annex: GuildHE Responses to the REF 2028 Consultation, October 2023

Volume Measure

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).

5. What practical challenges may institutions face in implementing these changes?

GuildHE is supportive of the principle to use available datasets to reduce the burden of the REF assessment, and to align HESA and REF in ways that may lead to other benefits and reductions in bureaucracy. We've identified the following challenges:

- Institutions that are teaching intensive, have smaller research environments, or which have not entered the REF before will have challenges resourcing the use of HESA for this purpose. Ensuring different teams in the institution understand the process and what is required from a REF perspective will require additional work, including training on the technicalities. Depending on the extent to which institutions may modify the final allocations to UoAs, this alignment of the staff involved in the HESA return and those preparing for REF will need to happen in short order. The short-term burden of this alignment should not be underestimated and may particularly be felt by smaller institutions with less flexibility in the resources dedicated to those functions.
- The current timing of the staff HESA return - commit in October, final commit and sign off in November - would mean a finalised volume measure would only be available weeks ahead of any planned submission in late 2027. This would create a degree of uncertainty around volume measure and the exact number of outputs required for a submission would not be determined until very late in the cycle.
- Institutions on the boundaries of suggested thresholds for outputs and impact case studies are concerned they may not realise that until very late in the cycle. Will the data periods suggested give institutions enough time to understand what their volume measure is going to be? It looks quite narrow at present.
- The implications of being close to a boundary for ICS will be important, especially for smaller institutions where the result may be significant in proportion to the overall submission.
- In previous exercises institutions were able to make pragmatic choices about which UoA staff were linked to; the UoA used for HESA could be transposed to an allied UoA to allow for a more coherent submission. Institutions will need to know if that is permissible as soon as possible.
- Overall there is a concern that solely relying on data may mean that decisions taken a few years prior to the exercise, perhaps before institutions have had the opportunity and time to translate the guidance for REF into actual processes, may translate into large problems at the time of the exercise. Previous exercises allowed institutions flexibility; we would encourage pragmatism from the funders in ensuring that the full diversity of institutions can submit appropriate data to the assessment, and that none are disadvantaged for being emergent, small, or specialist in focus.

- We don't expect many institutions with emergent and consolidating research environments to use the exact same code of practice and anticipate changes to be far from 'light touch'. Many such institutions will have seen significant changes in their allocation of QR funding following REF2021 and as a result made understandable and sensible strategic changes to roles, processes, structures, and how research is organised at their institutions.
- In addition, given the changes to the exercise, specifically the broadening of excellence, extension of impact to include engagement, and the inclusion of people and culture with environment, we anticipate that most previous CoPs will not be fit for purpose as they will not reflect sufficiently on those aspects of the assessment.
- The processes to determine SRR in the last exercise involved liaison and consultation with staff and union representatives and any changes to the CoP will presumably need a similar amount of engagement in order to pass muster for an EIA.
- The funders may need to revise their expectation that the permission to retain codes of practice will result in less burden; it is in fact likely to result in a burden falling more heavily on smaller, specialist, and teaching intensive institutions.
- We acknowledge Research England's stated intention to prioritise the work on determining the practicalities of using the HESA data in this way, and commend this approach.

6. How might the funding bodies mitigate against these challenges?

- In the recent ARMA webinar Research England highlighted that software used to calculate the volume measure will be made available to institutions in order that they may do their own calculation ahead of official figures being released. That seems wholly sensible; please ensure this is supported with adequate training opportunities for institutions wishing to use it.
- Consideration should be given to developing training packages for staff involved in HESA returns, i.e. those in HR and other professional services roles
- Timely guidance, especially on codes of practice. We don't expect many institutions with emergent and consolidating research environments to use the exact same code of practice and anticipate changes to be far from 'light touch'. Many such institutions will have seen significant changes in their allocation of QR funding following REF2021 and as a result made understandable and sensible strategic changes to roles, processes, structures, and how research is organised at their institutions. The funders may need to revise their expectation that the permission to retain codes of practice will result in less burden; it is in fact likely to result in a burden falling more heavily on smaller, specialist, and teaching intensive institutions.
- Clarification on the precise data being used, the deadlines for HESA, and when the volume measure will be available to institutions is needed. It should be recognised that the timing of HESA returns is longstanding and built into wider HEI workstreams and planning processes, so there will be real challenges in creating a solution that works for all even across the four cycles of HESA return between now and a REF 2028 submission date.

- It may be that the funding councils need to consider staggering the changes to the exercise over two cycles. For example, for REF 2028 the funders could permit HEIs to determine their own volume measure for REF 2028, drawing on 25/26 HESA data and non-committed 26/27 HESA data, then testing that number against the final committed HESA data as part of the assessment phase and taking action where there is variation. For the next cycle the full process proposed could be used, having been tested in real time.
- Revised coding to ensure HESA codes map onto proposed UoAs, they currently do not.
- A clear explanation of what the process will be for a HEP to appeal if the HESA data doesn't match the data held by the institution.
- The funders could allow some re-coding of staff within certain limitations, similar to the processes used in REF 2021 for tolerance for Open Access compliance.

7. What would be the impact of these changes on individual researchers and particularly those with protected characteristics¹ or other underrepresented groups?

Whilst there are some benefits to individuals no longer being required to submit circumstances, we do have concerns around the implications for EDI, how representativeness is considered in submissions, and the impact on individuals with less 'power' in the system.

- There is a risk of marginalised groups becoming more so, with ECRs being particularly vulnerable.
- We would expect these changes to the volume measure to be balanced out by the People, Culture and Environment part of the submission, and that balance will only be achieved through clear and timely guidance from the funders as to how institutions are to demonstrate how the representativeness of submissions has been achieved.
- Whilst we acknowledge that institutions should be taking on responsibility for the application of sound EDI principles, and adhering to legislation and supporting charters to fulfil their obligations as employers, the REF exercise is undoubtedly an important factor in how comprehensively and diligently such considerations are applied.
- REF 2021 brought these issues to the fore; it would be a retrograde step if we see a return to the perverse practices of gaming, cherry picking, and reliance on 'star' performers.
- There is a dissonance between the approach to determining the volume measure - focussing on a narrow group of staff roles and responsibilities - and the approach to output selection - being permitted to be produced by any member of staff. Members have reported discomfort amongst staff communities; not about specific impacts on them as individuals, but a sense that there is a lack of clarity about what work will be in scope.

¹ (Details of protected characteristics can be found at:
<https://www.equalityhumanrights.com/en/equality-act/protected-characteristics>)

Output Submission

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

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

- We support decoupling in principle, although we have reservations about how this is achieved in practice to avoid unintended consequences that will adversely affect equality and inclusion, encourage gaming, and lead to increased burden.
- Without recourse to a process for individual circumstances, this may lead to the underrepresentation of researchers from underrepresented groups, those with disabilities, caring responsibilities, or who are earlier in their careers.
- Importantly, not having to disclose means that institutions might not be aware of circumstances in order to make adjustments to enable those staff to participate in research.
- Given the kudos associated with being returned to the REF, this could impact negatively on those researchers the guidance is seeking to protect, not only in terms of reputation but on perceived value within institutions.
- Institutions will still likely need to have some internal processes to identify staff and their outputs - in some disciplines like arts and humanities these are inextricably linked - and therefore codes of practice and EIA processes will still need to be as rigorous. A light touch, unburdensome replication of CoPs is therefore pretty unlikely to be achieved.
- It is important that HEPs have the confidence to submit outputs in non-traditional forms as well as more risky research, including that that may appear to be 'less' representative of the canon or in less 'representative' forms. The funders will need to make this explicit in the guidance, giving examples and pointing to precedents in previous exercises. In our experience conservatism tends to creep in when those leading submissions are less confident that all outputs will be treated equally.
- The funders need to give a clear explanation of what is meant by 'representativeness' in the submitted work, and how they intend to assess that.
- There may be some value to applying a maxima, or at least needing institutions to justify the inclusion of high volumes of outputs by any one individual as part of the PCE.
- There is a concern that some of the measures intended to reduce burden in the exercise will simply push that burden down the line to the audit stage.
- Equally there is a concern that decoupling will simply move pressure to submit from one group to another. It may relieve pressure on ECRs and researchers with circumstances that affect their ability to research productively in the REF assessment period, for example, whilst adding pressure on senior researchers to produce more.
- Finally in some disciplines outputs are inextricably associated with a single individual, such as in the arts and humanities. There is a risk here of alienation, a challenge to the sense of community within research cultures, and the value of individuals within that. Given the tensions in the sector over structural issues such as pay and pensions, we will collectively need to tread a careful path between the positive intention of supporting and reflecting research cultures and dismissing the very specific contribution of individuals. This may be a consideration for how facts about the assessment are communicated, and

the role of other colleagues in funding organisations, such as institutional engagement managers, can help ameliorate or 'temperature check' the ways in which these policy decisions are playing out on the ground.

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?*

- We note the differing scales and maturity of institutions and their relative ability to resource the assessment. As the REF Costs Analysis demonstrated there is a demonstrably larger and disproportionate financial burden on smaller submissions. We anticipate that the changes proposed, whilst sound in principle, are likely to result in significant costs at institutions as they develop fair processes for the selection of outputs, and they determine outputs from a much broader range of staff groups. This could land more heavily on smaller institutions, following the trends in the costs per type of institution seen in previous exercises.
- Careful management of the expectations placed on staff will be needed to handle the expansion of roles from which outputs may be drawn. The PCE element should include specific guidance on how institutions can articulate how that has been managed, and consideration made to how embedded research is at different types of institution; a teaching intensive institution will by its nature have fewer roles outside of those with research in their remit from which to draw such material.
- There is an expectation of tension between staff groups, and concern over how to effectively communicate the new REF scope to those without research explicitly included in contracts. There is a risk of both individuals and institutions being placed in compromising positions. Detailed guidance about the intent of this change in policy would be very helpful in guiding institutions to implement it on the ground.
- We are also mindful of the ethical implications here of institutions being rewarded for submitting outputs by staff who they have not supported with time or resource, and the adherence to the principle of transparency in research integrity.
- Alongside this policy institutions require clear direction about the policy for portability of outputs, if staff that have left the institution are eligible, and a clear articulation of what is meant by 'staff member'.
- There may be implications for individuals' contracting. Some institutions anticipate that it will make it potentially harder for individuals to move from a teaching to a research contract, as there will be less incentive for the institution to encourage this for the purposes of research assessment. Conversely other institutions, particularly those with very emergent research environments have suggested that with the new rules, it would be possible to include the research of a wider group of staff than the relatively small group of staff on permanent contracts, enabling the contribution of all to be recognised, and that this may have a positive effect on diversity. There are clearly going to be large variations in how this plays out for individuals; we are keen to see that the positive changes made to the REF - a focus on culture, collaboration, and recognising contribution - isn't undermined by a sense of inequity or lack of clarity in what is expected from staff groups.

- Whilst the need to link outputs to individuals in the submission system will, in theory, reduce burden, in practice, presumably verification of the substantive link to the institution / unit and evidence of fair and equal treatment of individuals will still need to be tested at audit. If so HEIs will need to keep careful records in the background of the staff to whom outputs are linked to provide such evidence.
- Additionally, if the above is the case, it will be important to establish the audit requirements around outputs and substantive link to a submitting unit earlier than in the past, to ensure that institutions are collecting this data in the right way, given this data will no longer be part of the submission itself. Should these assumptions be wrong, more clarity of how decoupling is actually going to work in practice is required.

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

- We do not believe that theses should be eligible for submission.
- The PhD is a period of training, and submission to the REF would place undue pressure on students.
- It may also impose the REF 2028 timeline as an arbitrary 'deadline' onto the period of study which would be unhelpful for students' sense of self-efficacy and ownership of their research.
- We note that co-authored outputs involving PGRS were submitted to previous exercises, and this may give a precedent for sole-authored outputs. However it is not clear in what circumstances an output produced outside of a student's registration period could be included, and it would be a challenge to determine that in a way that was satisfactory for the majority of cases. We therefore do not think sole-authored outputs by postgraduate research students should be eligible for submission for this exercise.
- Given their dependence on supervisors, institutions, funding (which may be themselves or their families) and so on, these individuals are not equal in the system and are therefore at considerable risk of exploitation and unfair practices.
- Institutions are not equal in their PGR cohorts in terms of volume, funding source, mode of study and so on. Including PGRS would advantage some, and disadvantage others, with Degree Awarding Powers further complicating the issue.
- The role of PGRs and the important role they play in a healthy research culture can be effectively narrated within the 'People, Culture and Environment' section – now given a greater weighting. Explicit guidance about how to achieve that, beyond simple numbers of students, and considering how these individuals are engaged in the research culture in meaningful ways, would be welcomed.
- As a member pointed out, some PhD candidates will have long periods of 'study' and work in impactful ways in UoAs and institutions that could be useful to capture. This is particularly true for mature students, part-time students, and those working towards professional doctorates or combining research with practice in industry.
- It would be helpful for the funders to consider how such contributions can be usefully represented in the exercise this time around, with perhaps a fuller consideration of

recognising PGRS in the next exercise with reference to the New Deal for PGRS currently being explored by UKRI.

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

- A balance needs to be sought between enabling institutions to positively reflect the contribution of individuals that may, for good and positive reasons, be involved in short term arrangements with the institutions' research, and preventing the use of this policy to game the assessment, exploit those with less weight or power in the system, or capitalise on precarity of careers (such as through short term contracts).
- Members have suggested using the precedents in the assessment, such as a 0.2FTE as a minimum, and a length of time to demonstrate a substantive commitment. Many feel 6 months is too short, preferring 12 months as more soundly demonstrating a sustained commitment that would promote better and more transparent practices.
- There may be some merit in combining factors, for example consideration of the nature of contracts (open-ended or short term) in combination with length of service and FTE. So for an open-ended contract of a minimum FTE no further evidence may be required, whereas for a short-term contract both a minimum FTE and other supporting indicators would be required. For those with no employment status supporting indicators and a narrative about both their contribution and the benefits they have received would be necessary.
- Indicators could include the following:
 - PhD Supervision
 - Evidence of contribution to the research environment such as mentoring, public action, or shared grant activity
 - Affiliation on publications / joint publication
 - Access to research funds from the institution
 - Tangible contribution to the research environment e.g. involvement in committees, structures, and organisational practices.
 - contractual arrangements or other informal but co-signed agreements, such as MOUs, that may be drawn up between project partners
- In the development of indicators we urge the funders to consider structural differences in different disciplines and the sectors they are aligned to. Institutions want and need to work on research with entities in industries that have less or no formal infrastructure for research, such as the creative industries, alternative health modalities such as osteopaths and chiropractors, individual small businesses such as farmers. As compared to arrangements with overarching umbrella bodies like the NHS, these kinds of relationships are likely to have fewer formal indicators to point to. Indicators for substantive connection therefore need to be broad enough to include these important contributors to research in these diverse domains.
- Visiting or Emeritus staff can offer significant benefits to research cultures, although to avoid gaming and perverse practices it may be helpful to not have to place such individuals on employment contracts. Perhaps length and / or intensity of engagement is a good indicator here.

- The changes signalled in the guidance leads us to believe that there will be a significant workload necessary to effectively document 'substantive connections' in place within a unit – with implications on burden which are significant for smaller and specialist institutions. Clarity is needed on when and how these connections need to be demonstrated - i.e. within the exercise or within audit.
- Funders should be mindful that for some disciplines the time lag between research support and output can be long, especially in the creative arts. Guidance should consider all manners of research, including blue skies, practice led / based, applied research, and translation research.
- We stress that institutions need clarity on portability to really understand what the implications of such policies on them will be. Many have reported difficulty in considering this and other questions posed because they do not yet know what will be permitted. Tracking what activity is done where is not simple. For emergent and consolidating research environments outside of research intensive universities there is a lot of movement of staff and collaboration with other, better resourced institutions; the issue of portability is therefore crucial if they are to understand the scale and scope of their submission.

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?

In general, yes we agree that the arrangements proposed are sound.

We ask the funders to clarify whether the exception made for Panel D in REF2021 - namely that outputs co-authored by two (or more) researchers within the same unit could be submitted more than once to the same UoA. This exception is important for these disciplines where it is not unusual to have collaborations within UoAs on edited collections, articles, monographs and/or practice research projects. Retaining this exception will be important in embodying the focus on collaboration and community dynamics highlighted by the initial decisions.

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

- We ask the funders to clarify whether the exception made for Panel D in REF2021 - namely that outputs co-authored by two (or more) researchers within the same unit could be submitted more than once to the same UoA. This exception is important for these disciplines where it is not unusual to have collaborations within UoAs on edited collections, articles, monographs and/or practice research projects. Retaining this exception will be important in embodying the focus on collaboration and community dynamics highlighted by the initial decisions.
- Parity of treatment with interdisciplinary outputs has been raised by members. If an output is co-authored within a UoA there is an argument for it being counted more than once, if an interdisciplinary output can count more than once.

- Cross referral and joint assessment offered reassurance in terms of assessing interdisciplinary research from vastly different disciplinary areas. We urge this be kept in place for REF2028.
- Contribution statements for Arts and Humanities outputs are helpful and recognise that there are very different publishing patterns for work in these disciplines.
- Clarity on whether the substantive link should be to UoAs and / or institutions would be helpful when dealing with co-authored outputs, as well as the submission in general

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.

The assessment of impact case studies will be supplemented by a structured explanatory statement, focused on outcomes and supported by evidence and data, which sets out the wider contribution research activities to society and the economy. Aspects of this statement will draw on elements previously captured in the environment element in order to minimise unnecessary additional effort. The explanatory statement will carry a minimum weighting of 20% of the quality sub-profile for Engagement and Impact

The number of case studies required in each submission and the weighting of the Impact statement will be determined by the average FTE of volume-contributing staff in the unit (2026/27 and 2027/28)

14. What will be the impact of reducing the minimum number [of impact case studies] to one?

- GuildHE welcomes the consideration of our previous statements about how the minimum of two impact case studies placed an unequal burden on small submissions, particularly from smaller and specialist institutions.
- It worked against the development of new disciplinary submissions, leading to small subject areas being subsumed in larger cognate ones, and put undue pressure on small numbers of staff. This is a welcome step in designing diversity into the assessment.
- We welcome the reduction to a minimum of one. It will relieve pressure on small staff teams, and reduce costs for units that are emergent and / or least well resourced.
- There are drawbacks, in that a single case study will carry a lot of weight, and the score will be evident. Institutions may become more conservative in their choices, perhaps resulting in the foregrounding of certain types of impact that are more quantifiable. Consideration should be made when providing guidance of the full range of impact types that are invited, with examples of high scoring case studies from those various types.
- The template provides a sensible solution to avoid over-exposing individual researchers whose research is underpinning an impact case study if there is only one submitted.
- Very clear information will be needed about the accompanying statement on impact, which for small submissions take on a significant proportion of the overall outcome, and this will be disproportionate compared to larger submissions.

- Some further consideration of scaling the requirements of the accompanying statement on impact for small specialist institutions would be useful.
- We are grateful for the option for very small units to have the opportunity to request exemption from submission.
- There may be an argument to lift the threshold for the minimum of one to 15 FTE. Here we recommend that the funders analyse the data from the last REF in combination with GuildHE's own intelligence gathering about the rapid growth of smaller research environments between exercises. We identified that the median mainstream QR has increased for our members by 78.17%, a much higher figure than the growth seen elsewhere in the sector (Russell Group 13.58%, Million Plus 48.22%). This growth in QR allocations results in larger submissions, and it may be that the threshold of ten is too low given that expected growth in research activity; the institutions it is intended to help move up into the next level, requiring two case studies once again.

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

- There are potential inequities in the thresholds proposed, with those institutions sitting above 10 FTE and below 60 FTE needing to submit proportionally more case studies. We can see some rationale for minimising the volume of potential submission at the top end of the scale, however, these small to mid-sized units are at a disadvantage due to their very nature.
- We request that the funders consider whether institutions across the board will see the same level of expectations on units, or whether as we suspect this burden of proving impact falls more heavily on teaching intensive institutions.
- Without an accurate volume measure some institutions will find themselves on the borders of these thresholds, and may need to identify additional case studies rather late into the assessment cycle. This is another area where the same small to mid sized institutions are at a disadvantage; they have less resource to prepare submissions yet may find themselves needing to expend more effort proportionally to meet their obligations. We would like the funders to consider whether there are ways to calculate the volume measure using a combination of HESA and institutional data for this exercise, mitigating this problem, moving wholesale to HESA for the next one.
- There may be the unintended consequence that institutions combine UoAs in order to reduce the case study numbers; which would be detrimental to the granular detail and health of disciplines.
- institutions we have consulted have raised concerns over the following aspects of impact and engagement within the exercise. Whilst they are not directly about the thresholds, these factors are crucial in helping institutions identify the work to focus on and where more development is needed to meet the thresholds for case studies and represent their research capabilities most accurately:
 - lack of clarity about how rigour will be assessed, and a lack of time to devise and implement the good practice needed to capture the data required to demonstrate rigour this late in the assessment cycle

- lack of clarity about how the quality of underpinning research will be ensured, and how the rigour and quality of impact will be linked to that of the underpinning research.

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

- This is a sensible measure to enable institutions to articulate their research impact, and not to overly draw on single case studies or narrative elements in isolation to make the assessment.
- It will be important for institutions to see the impact template and begin exploring how it will operate in practical terms. We would welcome the opportunity to review these templates as part of the consultation process on the guidance, as the structure will determine how comfortable institutions feel with the proposed weightings.
- For institutions submitting 1 impact case study, the reliance on the statement is rather high. In such contexts institutions do not typically 'buy in' expertise, as other more well resourced institutions can - as demonstrated in the REF Costs report. Neither do they have extensive infrastructure to support the collation of data and evidence to support the work. As such this statement, counting for 12.5% of the final assessment, will be a significant responsibility, potentially held by a single individual in much the same way as the impact case study itself.
- Any sliding scale could be adjusted so that the impact statement carries less overall weight at the beginning of the scale, and that other means are found to distribute the assessment for these institutions. For example, there may be data drawn from other parts of the submission. However we can see that a reduction in the minimum necessitates some other mechanism, and the solution proposed may be the best practicable combination.
- Smaller submissions are at a disadvantage in REF for a variety of reasons due to their scale. In REF 2021 considerable work was done by the panels to ensure that smaller submissions were assessed in terms of what excellence looks like and a lot of work undertaken to bias because of size. We hope that similar work will be done in this exercise, in the interests of supporting equality, diversity and inclusion of institutions, disciplines, and individuals.

Unit of Assessment

The funding bodies propose to retain the REF 2021 Unit of Assessment structure (Annex B). The funding bodies invite views from disciplinary communities and institutions on any disciplinary developments since REF 2021 that would require changes to be made to the UOA structure

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.

- We are broadly content with the UoA structure and believe the continuity with REF 2021 is a positive thing.

- We have concerns with regard to equity about the variance in UoA structure in Main Panel D. It is important that the panel structures are equitable. Some single subject UoAs have very small submissions – and notably there were cases of a marked reduction in submissions from REF 2014 to REF2021.
- We are concerned that there is a lack of consistency in previous decisions made to combine disciplines into UoAs, and that this results in the perception that some disciplines are more equal than others, or more inherently deserving of rigorous assessment. We would welcome further consultation with disciplinary communities and a more fulsome exploration from an EDI perspective of how such decisions may exclude or marginalise those disciplines. For example:
 - The rationale for bringing Music and Drama together was around avoiding small panels but this rationale doesn't appear to have been applied consistently across the board.
 - The continued combination of psychology, psychiatry and neuroscience under UoA4 will further marginalise psychology disciplines which are not medical, biological or experimental in focus.
 - The continued incorporation of some substantive disciplines, such as criminology, media studies and screen studies, into wider UoAs, whilst other disciplines such as Classics retain their own discrete UoA, may have impacts on the identities of these disciplines.
- We also have concerns around the consequent workload implications for certain very large subpanels. The statistical data in the Main Panel D report demonstrating the size of the different submissions and the membership of the subpanels in the public domain allows us to observe that the workloads were not even. Equity and inclusion necessitates an understanding of the consequences of this.
- Should the UoA structure remain, panels need to be resourced appropriately, recognising the very different scales of the units of Main Panel D. The workload must be consistent for transparency and equality. It feels important to note the implications in burden for the subpanels as well as the institutions of the measures proposed.
- What is proposed here is a very different exercise from REF2021 and we would urge that the funding bodies ensure appropriate and measured training for the subpanels.
- Finally we want to highlight that whilst we know the funders dissuade league tables and rankings of results, this inevitably occurs post exercise. In such rankings single UoA submissions are often omitted, and the UoAs are the public face of the disciplinary groups - in short all nuance is lost. We commend that funders consider the optics of grouping, or not grouping, some disciplines together, and the effect this has on the health of those disciplines.

Impact of the Covid-19 pandemic

The funding bodies intend to retain the statements on Covid impact that were used in REF 2021, and to require some consideration of how Covid impacts have been addressed in output selection as part of Codes of Practice.

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

- Clarity is needed about the purpose of these statements and how they will be assessed. Their immediacy in REF 2021 necessitated a certain approach, but for the next exercise they will be recounting quite different things. There will be effort required to capture all evidence related to the effects of Covid so clear guidance is needed.
- We are only just beginning to realise what the implications and long-term effects of Covid are. Covid has disproportionately affected certain groups – those with underlying health conditions and school age children, those with caring responsibilities, for example. The guidance currently does not recognise these inequalities, and without the disclosure of individual circumstances it is unclear how institutions will effectively take account of the impact of Covid.
- To overcome some of these uneven effects, a covid statement could be included in both the institutional people, culture and environment statement and, perhaps optionally, in the disciplinary level statements in recognition that subjects were impacted in different ways, and there might be different narratives at subject level than at institutional level. For example
 - Health researchers note that there continue to be challenges in accessing health professionals and patients because of ongoing pressures on the healthcare system, and that this has limited impact development as well as some types of research.
 - Those working in performance research have an interrelationship with various creative sectors, all of which continue to see significant ongoing effects of Covid on programming and delivery of work.

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

- Given that the last exercise was delayed by Covid and the ripples of the pandemic are being felt, largely unevenly across individuals, communities, institutions, and disciplines, there remains an argument for delaying the exercise until 2029 or 2030.
- Broadly speaking, small to medium size universities and less research-intensive universities are in weaker financial positions than pre-pandemic and, among many other things, this has affected their ability to develop and extend their research and its impact.
- We have seen this play out in applications for Research Degree Awarding Powers, a key milestone for the development of research environments. Only one institution has achieved RDAP since the guidance was changed in 2019; prior to that at least 1 and often 2 institutions were awarded powers in each year. This is an indicator that institutions do not feel in an optimum position to apply, with factors including changes in the administration of awards, the effects of Covid on research environments and people, and financial pressure being part of that decision making.
- Some industries have yet to recover to pre-pandemic levels, including the performing arts. Most if not all research in these disciplines are interrelated to the 'industry', and as such there could be accommodation made for that in the assessment.
- We realise a delay is anathema to the funders' current direction of travel, however it would arguably allow institutions time to digest, understand and implement the criteria more effectively, and for ongoing effects of Covid to be smoothed out over a longer period of time.

- Another option would be to stagger the changes proposed to the exercise. For example, the PCE could have the same weighting as the environment submission in REF 2021, or the use of HESA data could be combined with institutional calculations of the volume measure for this exercise before being implemented more fully next time.

Cymraeg in HEFCW

Welsh and English are the official languages of Wales. HEFCW treats the Welsh and English languages on the basis of equality in the conduct of its public business in Wales. We recognise the important role higher education (HE) has in fulfilling the Welsh Government's vision for a bilingual Wales.

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?

- We support the vision for a bilingual Wales and consider the funders proposals an appropriate response.

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

- In the interests of equality, the funders may wish to consider if the singling out of Welsh language has any adverse impact on speakers of other languages in the UK, such as Gaelic, Cornish, Scots, and British Sign Language. We welcome consideration of how research in all languages can be treated equitably.
- There are cost implications for institutions working in Wales and adhering to HEFCW's policies. It will be important to acknowledge how those additional costs affect the resourcing of research, and guidance should be given as to how best to demonstrate commitment to multilingual access in the exercise. In short, there should be no detriment to committing to the bilingual policy when assessments of research environments and scales of output are made.