

Respondent's details

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Consultation question 1: Do you agree with the proposed key features of the REF? If not, explain why.

Overall, we support the proposed features of the Research Excellence Framework (REF), particularly the involvement of peer review and assessment based on a range of quality indicators. Of utmost importance though, is the need to ensure that research excellence and quality underpin all aspects of the REF. Excellence, not simply applicability, must be the main driver. To this end, the definitions of the quality criteria for the three components: Outputs, Impact, and Environment, must be clear. Identification and further separation of the highest levels of research quality, and their differentiation from lesser quality research, is essential. To enable true differentiation, there needs to be greater distinction between research currently identified as 3* and 4* in the 2008 RAE. We propose that more than four starred quality levels are necessary. It is only through these principles, that the policy of selective funding of the highest quality research can be advanced and supported.

The REF is an assessment of research activity. Thus the definition of 'research' in the REF must be comprehensive and align to the Frascati definition, for example (paragraph 24 must align to paragraph 38 in the proposals).

Whilst we recognise that it is important for impact to be assessed in the REF, it should be introduced only when the robustness of the assessment has been tested and confirmed. We have serious concerns that the proposed contribution of 25% for impact in the first REF exercise is too high. We propose that, until the assessment has been shown to identify and distinguish high quality impact, the weighting of the impact sub-profile be reduced.

Consultation question 2: What comments do you have on the proposed approach to assessing outputs? If you disagree with any of these proposals please explain why.

Comments are especially welcomed on the following proposals:

- that institutions should select research staff and outputs to be assessed
- for the categories of staff eligible for selection, and how they are defined
- for encouraging institutions to submit – and for assessing – all types of high-quality research outputs including applied and translational research
- for the use of citation information to inform the review of outputs in appropriate UOAs (including the range of appropriate UOAs, the type of citation information that should be

provided to panels as outlined in Annex C, and the flexibility panels should have in using the information)

and on the following options:

- whether there should be a maximum of three or four outputs submitted per researcher
- whether certain types of output should be 'double weighted' and if so, how these could be defined.

We support the policy of selectivity throughout the REF (staff, outputs) and the proposal that Higher Education Institutions (HEIs) select the staff and outputs for submission. Based on this selective approach, we agree that volume of staff submitted should remain the volume driver for funding.

The definition of eligibility of staff should be clear and transparent and developed in consultation with the sector. The definition of staff employed elsewhere (i.e. the replacement for Category C) must allow for NHS clinicians, associated with the institution, but not formally employed, or on the payroll. It should also allow for externally funded Research Fellowships, industry secondments etc. to enable the inclusion of all independent researchers carrying out research at the institution. A robust audit process to check eligibility would be needed.

The consultation proposes that fewer outputs might be required from staff on fractional contracts in the REF. It is not necessarily the case that a fractional FTE staff member spends less time on research than a full time staff member. In addition, the FTE on a census date is not necessarily a full reflection of a member of staff's research activity over the assessment period. We propose that the threshold of 0.2 FTE applied in RAE 2008 is the best approach and that reduced productivity should be expected only in exceptional cases which relate to specific individual staff circumstances.

The maximum number of outputs to be submitted should not be less than four. This should be a consistent requirement across all subjects. A reduction to three research outputs raises the risk of sub-profile grade inflation as a result of a more selective submission process. Fewer publications may lead to less rigorous assessment, in both peer review and in the interpretation of bibliometric (citation) information. The publication of four high quality research outputs is a reasonable expectation in the time period of the REF assessment. The robustness of the assessment, tested through a reasonable sample size of outputs, is more important than burden in this context.

We agree with the proposals that all types of research output, provided they conform to the Frascati definition of research, should be eligible in the REF. We do not support the double weighting of outputs in particular subjects. Allowing a longer time period for the inclusion of a particular research output type would be preferable to double weighting in the assessment. We are comfortable with the use of citation information, if available, to *inform* the peer review assessment of outputs in light of the conclusions of the REF bibliometrics pilot and the Expert Advisory Groups. The limitations of citations appear to be understood and expert review is an important component to addressing these. It is essential that panel criteria make clear that high quality research outputs without citations will still be ranked highly so that HEIs select outputs on the basis of quality and not citations alone. The example contextual information included in Annex C of the consultation document is helpful and sub-panels must be clear about whether, and how, they will use citation information.

We also agree that citation information should be made accessible to institutions in the form it is to be provided to panels and within an appropriate timeframe to inform REF developments. Given changes in citation databases, and varying coverage of disciplines, we would urge REF not to limit itself to one database provider.

To supplement the evidence provided by citation information short statements (100 words) should be included for outputs in all sub-panels to highlight the user and academic significance of the output.

We support the proposed formation of sub-groups of academic panel members to assess research outputs to enable the work of specialist disciplines to be assessed by panel members with appropriate expertise. Impact and environment should be assessed at the level of the whole UoA.

In line with our proposed changes to the overall quality levels, the quality levels and descriptors for the assessment of research outputs should be revised and also extended to encompass more than four starred levels. The current definitions suggest that all work that meets the eligibility criteria is expected to be at least 'good' ('nationally recognised') which seems extremely unlikely. In addition, the use of 'recognised' in the current definitions of two and one star research activity ('internationally recognised', 'nationally recognised') should be removed and/or extended since 'recognition' does not necessarily imply quality.

Consultation question 3: What comments do you have on the proposed approach to assessing impact? If you disagree with any of these proposals please explain why.

Comments are especially welcomed on the following:

- how we propose to address the key challenges of time lags and attribution
- the type of evidence to be submitted, in the form of case studies and an impact statement supported by indicators (including comments on the initial template for case studies and menu of indicators at Annex D)
- the criteria for assessing impact and the definition of levels for the impact sub-profile
- the role of research users in assessing impact.

We recognise the increased importance of demonstrating the impact of research. However, we have serious concerns about the heavy weighting proposed given that the methodology for assessing impact is as yet un-tested.. The assessment of impact should, at least initially, carry a lower weighting towards the overall quality profile until the process for criteria and assessment is established and robust. The assessment methodology must be demonstrated as able to distinguish between levels of excellence in impact at an appropriate level of granularity. We appreciate the manner in which the Higher Education Funding Council for England (HEFCE) approached the bibliometrics pilot and the refinement made to the proposals and process in light of its learnings. Given that impact measurement is even more complex and at an earlier stage in its development than bibliometrics, a similar approach should be adopted for the impact pilot. Significant changes to the proposals in light of the learnings of the pilot may be required. It may be necessary to delay the introduction of impact assessment in the REF until the robustness of approach can be proven.

The proposals are not clear about how the excellence criteria will be applied. The quality criteria for high quality impact should align with the points made in paragraph 51, that for ground-breaking impact to be considered of high quality it must also be under-pinned by excellent research and a high quality research environment. We support the proposal that the underpinning research and environment must meet threshold quality criteria for an impact to be eligible. Academic peer reviewers will need to be responsible for this assessment. Care will be needed to ensure that broader non-research related activity is not included.

The draft template for impact case studies is a helpful starting point and will be refined during the impact pilot. Exploitation activity alone cannot be considered of high quality without evidence of the supporting excellent research and resulting ground-breaking impact.

It is widely acknowledged that the assessment of impact at a too granular level is not appropriate. We feel that a case study per 10 FTE of staff is too fine a level of detail and we would suggest that, subject to the outcomes of the REF impact pilot, the number of expected case studies be reduced, and the scale of each case study, and the robust indicators required, be increased.

We consider that the current scope of impact is too narrow and that this could have a detrimental effect on fundamental research. Often the more fundamental and theoretical aspects of research have impact on other academics who may refine and develop the work which may then be taken up by industry. The timescales for indirect impact may be more than five years and so cannot be captured by the significance statements relating to outputs.

Impact is essentially output of research whereas environment relates to input of research. The current proposals confuse the issue by including quantitative input indicators such as industrial and government funding as impact, whereas Research Council funding is included under environment with no indication about EU funding. All funding should be included under environment to avoid this confusion. Most of the common menu of impact indicators will require some short explanation as otherwise they will be very difficult to assess. In addition, context is needed to accompany many of the suggested indicators, for example it is not possible to measure improvement to health without knowing the initial health circumstances of the affected patients; otherwise those starting from a lower base would be advantaged.

The issue of the time period in which impact might be felt is complex and variable. Impact can take longer than 10-15 years to arise and may span multiple assessment periods. This is not dealt with in full by moving the assessment (i.e. attribution) window. Further significant impacts will continue to evolve and potentially increase over time. True 'ground-breaking' impact will have on-going significance and there may be justification for returning evidence of the same impact in subsequent exercises. For these reasons, we would support a case study being commissioned by HEFCE to look into the time periods for impact to be felt.

We agree with the involvement of research users in the assessment of impact. However, and as would be expected, many will have close personal knowledge of the work and may, for example, have funded it. A register of interests and process similar to that required for academic members will therefore be needed to manage this.

In summary, it is our view that the assessment of impact must relate to research only and have direct effects. The submission of information on impact must be fully auditable, considered at an appropriate level of granularity and be applied consistently across all subjects. The weighting of the impact sub-profile should be greatly reduced, at least initially, until the methodology is understood fully and considered robust.

Consultation question 4: Do you have any comments on the proposed approach to assessing research environment?

We are in full support of the proposal that the research environment should form a core component of the REF. The environment is important for assessing the longevity, sustainability of the future research and its quality. Given that the REF is used to determine future funding then a prospective measure such as this is essential.

We agree that engagement of staff in high quality research driven relationships outside the HEI is an enabler of research translation. There are many and varied ways to achieve this and an approach should not be stipulated.

We note that the proposal is to use Higher Education Statistics Agency (HESA) data where appropriate. We broadly support the alignment of requirements for research income and

research student data. Close discussions between HEFCE, HESA and HEIs will be required to achieve this. HEFCE must be very clear to panels that the data does not necessarily relate to the selected staff submitted and so the common practice of normalisation by submitted staff FTE would not be appropriate. In addition, some categories of data (for example types of funding) returned in previous research assessments would no longer be included.

When considering the environment, panels should attach great importance and weight to measures which are the result of competitive peer review.

A detailed template for submitting and assessing environment and related indicators is also needed. Similar to the impact statement, a set word limit per FTE would be helpful to ensure consistency between submissions.

Consultation question 5: Do you agree with our proposals for combining and weighting the output, impact and environment sub-profiles? If not please propose an alternative and explain why this is preferable.

We agree that the sub-profile outcomes of the REF should be combined into a single overall quality profile for presentation and to inform funding outcomes. We also agree that the weightings of the sub-profiles should be standardised and the assessment outcomes normalised across all panels to support consistency.

In support of the policy of research selectivity, we regard that the present profiles and their descriptors do not contain sufficient differentiation. The definitions of each quality level need further clarification, in particular the top two levels: 'World-leading' and 'Internationally excellent' need to be distinguished more clearly to enable this differentiation. We also suggest that the proposed 'internationally benchmarked standards of excellence' should be provided to HEIs as well as panels to aid the transparency of the assessment process.

We feel very strongly that the weighting of the impact sub-profile is too high. As mentioned earlier in our response we recognise the importance of the inclusion of impact but we feel that the weighting, at least initially, should reflect the need to implement this gradually as the methodology for assessing and measuring impact becomes more refined. Subject to the findings of the REF impact pilot, we propose that weightings of the sub-profiles towards the overall quality profile for the REF should be:

Research outputs: 60%; Impact: 20%, Environment: 20%.

The weighting for environment should reflect the fact that it is as important as impact. It may be necessary to reduce the weighting of impact further based on the outcomes of the pilot.

In addition, we support the proposal that the assessment process should give differentially greater recognition where units demonstrate excellence in all three areas of assessment: research outputs, impact and environment

As mentioned earlier, further differentiation of the quality levels could be achieved by increasing the number of levels in the quality profile and through revisions to the definitions. The current quality level definitions suggest that all work that meets the eligibility criteria is expected to be at least 'good' ('nationally recognised'). This is an extreme step change between work that is considered to the 'nationally recognised' to work that is unclassified. In addition, the use of 'recognised' in the current definitions of two and one star research activity ('internationally recognised', 'nationally recognised') should be removed as 'recognition' does not necessarily imply quality.

Consultation question 6: What comments do you have on the panel configuration proposed at Annex E? Where suggesting alternative options for specific UOAs, please provide the reasons for this.

The proposals state that a typical REF panel will expect to receive approximately 2000 FTE of staff. However, based on the FTE of staff submitted in the 2008 RAE, the Engineering panel will receive more than twice this. It is very important that the formation of fewer panels does not lead to fewer panel members. To support this we agree with the proposal that panel size must vary with the projected FTE of staff submitted.

Clarification whether multiple submissions to a REF Unit of Assessment (UoA) would be permitted would be welcomed. If they are, then the criteria for permission must relate to academic distinctiveness. As mentioned earlier in our response we support the formation of sub-groups of academic panel members for the assessment of research outputs such that specialist disciplines are reviewed with appropriate expertise.

Consultation question 7: Do you agree with the proposed approach to ensuring consistency between panels?

Consistency amongst panels is of utmost importance. We support the proposed standardisation of all aspects listed in paragraph 100 of the consultation document. Panels should be allowed to deviate from this consistent approach only in very exceptional cases. Any deviation from the standard approach (for example content of short statements alongside outputs, selection of indicators from the common menu of impact indicators, emphasis of elements within environment) must be within HEFCE guidelines and the reasons justified and understood.

Consultation question 8: Do you have any suggested additions or amendments to the list of nominating bodies? (If suggesting additional bodies, please provide their names and addresses and indicate how they are qualified to make nominations.)

Criteria for the membership of panels must be pre-eminence in research, such that the outcomes are able to command the respect of the sector and beyond. User and international representatives must be conversant fully with the UK higher education research system and the research assessment processes and be respected by the user and academic community. Where subject knowledge is very specific, then this is better handled through the provision of specialist advice rather than formal panel membership.

Consultation question 9: Do you agree that our proposed approach will ensure that interdisciplinary research is assessed on an equal footing with other types of research? Are there further measures we should consider to ensure that this is the case and that our approach is well understood?

All types of research – basic, applied and interdisciplinary should be treated equally in the assessment. The proposals, particularly around impact, possibly present the risk that basic and/or less relevant research, even though excellent, might be assessed in a less equal footing than other areas.

Consultation question 10: Do you agree that our proposals for encouraging and supporting researcher mobility will have a positive effect; and are there other measures that should be taken within the REF to this end?

The intention here must be to not actively discourage research mobility rather than to encourage it at the expense of staff remaining at particular institutions. Caution is therefore

needed to ensure that perverse incentives, which ultimately rest with the individuals and institutions, are not created.

Paragraph 110b proposes that staff who have spent time outside Higher Education (HE) would be permitted to submit fewer than four research outputs. We do not agree that this should be a specific 'rule' that is applied across the board. Instead this is better handled as an individual staff circumstance where appropriate. Staff that are new to HE and have joined academia late on during the assessment period are, by definition, categorised as early career researchers and as such may be permitted to return fewer than the maximum number of outputs, as defined by HEFCE. However, staff that spend some of their time in industry should be treated as other academic staff and be expected to submit the maximum number of outputs.

Consultation question 11: Are there any further ways in which we could improve the measures to promote equalities and diversity?

We agree that communication to staff eligible for submission to the REF is an essential part of the decision making process. HEIs should be required to adopt fair and transparent processes in line with their specific circumstances.

We also agree with the central provision of guidance and criteria. It is very important that panels are consistent in their treatment of individual staff circumstances.

Consultation question 12: Do you have any comments about the proposed timetable?

The timescale for the implementation of the REF is very short and much lead in work is required for HEFCE to develop and publish consistent and clear definitions.

In accordance with earlier paragraphs, the implementation of impact assessment in the REF should occur only when a robust method with appropriate quality level differentiation has been developed. It may be necessary to make significant changes to the requirements and proposed assessment of impact and/or reduce the weighting of the impact sub-profile in the REF. The assessment of impact must be implemented consistently for all subjects. We would like to see the timescale adjusted to permit lessons learnt from the impact pilot to fully inform the REF guidance on impact assessment.

Consultation question 13: Are there any further areas in which we could reduce burden, without compromising the robustness of the process?

The burden of the assessment of research quality is not a significant issue in the design and implementation of the REF. Of greater importance is the need to design a robust framework and methodology. This should not be compromised by a desire to reduce burden. The assessment must be able to identify and assess the highest quality research. As mentioned earlier, we believe that the proposed possible reduction of the volume of outputs for assessment would undermine the robustness of the assessment process.

Given the use and implications of REF outcomes, in reputation and funding terms, the outcomes must be robust and defensible. A desire to, and attempts to, reduce burden may increase the risk that outcomes are challenged.

To support panel members information should be provided in electronic formats. Impact and environment data should be provided in a form (for example spreadsheets) that will simplify and aid the assessment process.

Consultation question 14: Do you have any other comments on the proposals?

We are in full support of the policy of selectivity, namely the selective funding of the highest quality research. This is particularly important in the current and forecast economic climate, where scarce resources have to be distributed where they will be used to greatest effect. The research intensive universities can most usefully contribute to the future wealth and prosperity of the economy and to recognition of the global importance of UK higher education. Only through having an assessment method which can identify, measure and ultimately fund the very best research will this be achieved. Funds following REF should therefore be more concentrated. Further dilution (as experienced following RAE2008) would be to the detriment of the entire UK higher education sector.

The introduction of more than four starred quality levels and a mechanism which recognises and rewards breadth and depth of research excellence across subjects is therefore crucial.