### Research Excellence Framework 2028: issues for further consultation following initial decisions

\*Note that the response to the survey needs to be submitted by 6 October 2023\*

#### Overview

The four UK higher education funding bodies (Research England, SFC, HEFCW and DfE NI) are publishing key decisions on the high-level design of the next research assessment exercise and outlining issues for further consultation. These decisions represent a shift towards a broader and more holistic approach to research assessment. This survey is hosted by Research England (part of UKRI) on behalf of the four UK funding bodies. The survey is available as a downloadable PDF for convenience (see below). Please note that a Welsh version of PDF will be made available shortly. Please only respond to the consultation using the survey. See the full initial decisions document, annexes and supporting documents: [https://www.jisc.ac.uk/future-research-assessment-programme/initial-decisions]

Following the publication of these initial decisions, further work is required to develop the more detailed guidance and criteria. This survey is asking for your input on specific policy aspects. Please see Annex A of the initial decisions document for details.

#### **Personal Details**

The responses to this consultation will be considered by the boards (or equivalent) of the funding bodies in late-2023. Further decisions on the high-level design of REF 2028 will be announced in Winter 2023. 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 decisions 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. The funding bodies reserve the right to take into account the nature of the respondent in our weighting of the analysis.

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, <a href="https://ico.org.uk/">https://ico.org.uk/</a>

### 1. What is your name?

Dr Karin Bottom

### 2. What is your email address?

k.a.bottom@bham.ac.uk

### 3. What is your organisation/institution?

United Kingdom Association for Public Administration (UKAPA) – formerly the Joint University Council's Public Administration Committee.

# 4. Are you answering on behalf of your organisation/institution or as an individual?

Organisation/Institution

**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). See paragraphs 71-76 and 84-85 in particular in the REF 2028 initial decisions report: <a href="https://repository.jisc.ac.uk/9148/1/research-excellence-framework-2028-initial-decisions-report.pdf">https://repository.jisc.ac.uk/9148/1/research-excellence-framework-2028-initial-decisions-report.pdf</a>

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

It is not known what the final formula is for the allocation of funding relative to performance/volume. Alongside the allocation formula, decisions on the metrics for 'People, Culture and Environment' will have significant impacts on how institutions respond, though these do not feature in the current consultation. As a result, a number of significant practical challenges may not yet be apparent.

Scholars in disciplines fragmented across HESA classifications and in particular individuals with protected characteristics within these disciplines are likely to be doubly discriminated against, not only in terms of submissions and their inevitable implications, but also indirectly in terms of the support they are likely to receive.

We are concerned that current HESA data is not sufficiently accurate or granular for a key aspect of the next REF exercise, namely, the alignment of staff with significant responsibility for research to specific units of assessment.

The importance of public service policy, delivery and assurance is demonstrated by its representation across a wide range of units of assessment including in REF 2021, A2 (Public Health, Health Services and Primary Care); C13 (Architecture); C16 (Economics and Econometrics); C17 (Business and Management Studies); C18 (Law); C19 (Politics and International Studies); C20 (Social Work and Social Policy); C21 (Sociology); C23 (Education) and D34 (Communication, Cultural and Media Studies, Library and Information Management). Scholars whose research relates to these areas are also located across a wide range of HECoS codes (100090 public administration; 100091 public services; 100647 public policy; 100648 health policy; 100649 welfare policy as well as associated codes across management, law, accounting and associated disciplines). As a result, a large proportion of Public Administration scholars will be assigned to different (and a variety of) disciplines listed in the HESA. Further, they will often be assigned to subject areas that differ from their teaching discipline. Small disciplines and units and/or subject disciplines that see scholars fragmented across HECOS and HESA assessment units (such as Public Administration) can be overlooked when compared against larger subject areas, this leaves them at a clear disadvantage.

If institutions are again required to distinguish which research assistants have significant responsibility for research and reflect this in HESA returns, this will require a process to identify such staff at regular intervals across multiple years, thus adding to the overall burden on individual institutions.

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

Provision of clear, transparent, and timely guidance on the new arrangements and encouragement for individuals to review their HECOs/HESA unit field and how it is to be used.

Provision of the final allocation formula well in advance of the submission would help clarify the parameters of the exercise.

With reference to research assistants, the funding bodies should provide clarity on expectations regarding identification of those with significant responsibility for research. It would be helpful to clarify if the assumption that individuals with job titles of research assistant or research associate will be assumed not to have significant responsibility for research, except in exceptional circumstances, as they were in REF 2021.

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

Details of protected characteristics can be found at: <a href="https://www.equalityhumanrights.com/en/equality-act/protected-characteristics">https://www.equalityhumanrights.com/en/equality-act/protected-characteristics</a>

The unit field in future HESA returns will impact on individual researchers, depending on their individual circumstances and how the data is used by third parties e.g., those generating league tables. There will be instances of changes in staff workload profiles and temporary interruptions to workload allocations (e.g., extended maternity leave or caring responsibilities) which are not captured.

The changes might be particularly beneficial to early career researchers because they are able to contribute outputs without necessarily being included in the volume measure. Many researchers earlier in their careers will be relatively young, and so the protected characteristic of 'age' is positively impacted by these changes. On the other hand, changes could reduce the autonomy and influence of more junior researchers.

The proposed changes may add additional emphasis to research teams and groups, with outputs submitted by the group predominantly being those with senior researchers as the corresponding author. There may also be less of an emphasis on all members of research teams needing to publish, resulting in supressed development of more junior researchers.

#### **Output Submission**

The funding bodies propose to fully break the link between individual staff members and unit submissions (Annex A, paragraphs 12-18) See paragraphs 50-54 and 86-87 in particular in the REF 2028 initial decisions report: <a href="https://repository.jisc.ac.uk/9148/1/research-excellence-framework-2028-initial-decisions-report.pdf">https://repository.jisc.ac.uk/9148/1/research-excellence-framework-2028-initial-decisions-report.pdf</a>

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

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The proposed changes should break the link between individuals and unit submissions, which could benefit individuals with protected characteristics as there will no longer be a need to make a case for reduced or no outputs from these researchers.

These changes helpfully acknowledge the contribution from researchers with supporting or non-standard roles (including professional practitioners who are numerous in Public Administration) and enable them to contribute equally to a return.

The changes would allow outputs to be submitted when they are optimised rather than to meet REF deadlines. This may also support the development and submission of long-format outputs such as monographs and books Additionally, it should reduce the pressure for part time colleagues to hit capricious publication targets, all of which impacts disproportionately on underrepresented groups and those with protected characteristics.

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

The learned society comments here from the perspective of representing institutions and individual scholars engaged in research on Public Administration and associated areas.

The changes could enable institutions to create 'research elites' that produce sufficient outputs for the submission. This would discourage those who in the past might have been supported (with time and resources) to become research active or boost their profile to increase the number of outputs submitted. As a result, resources may be diverted away from developing researchers into established researchers.

The new system could generate an expectation of contributing to REF without the attendant institutional recognition or reward. Changes may also lead to the re-emergence of 'vanity' appointments, with institutions appointing highly regarded researchers on de minimis contracts (0.2FTE for 6 or 12 months) to allow for their outputs to be included in submissions. This practice was reduced significantly in REF 2021 (from REF2014) but it should not be encouraged.

This risk of potential exploitation needs to be recognised. It may become more difficult for staff on non- academic contracts to obtain jobs without publications. While the changes remove the need for contractual changes to allow outputs to be included in submissions, there may be an unintended incentive for institutions to move researchers to contracts that do not contribute to the volume measures, but still include their outputs in submissions.

This embraces the issue of 'portability.' Careful consideration needs to be given to defining a 'demonstrable and substantive link to the submitting institution' in relation to outputs. Indicators of 'demonstrable and substantive link' need to go beyond institutional affiliations of output authors and their employment contracts. There are two issues that need to be balanced i.e., fairness to the researchers and fairness for the institutions. In being fair to institutions, it should recognise the investment they have made in an output. Institutions should still be able to claim a substantive link to an output where the research was undertaken while the author was employed at their institution, even if they were employed elsewhere by the time the output was submitted or accepted for publication. This issue could be particularly acute with longer form outputs, which can be several years in production.

The second concerns creating a reasonable bureaucratic burden in demonstrating a substantive link. While this needs to be balanced with the first point, REF also needs to avoid an overly narrow set of indicators demonstrating a substantive link. Additionally, Institutions should not face excessive burdens in demonstrating a substantive link. We would also suggest that determining a substantive link will prove more difficult for certain types of outputs, in particular practice-based outputs (common in Public Administration) and non-journal articles more generally, which should be encouraged rather than discouraged.

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

Yes, we support the inclusion of independent research outputs written by PGR students as this is fair across the sector and subject expectations of research supervision and research groups.

However, establishing the contribution and coming to agreements regarding intellectual property contributions make the inclusion of PhD theses impractical and we do not support their inclusion. There is also an issue with duplication, where work within a thesis is also reported in publications.

Additionally, we would also point out that other forms of doctoral research exist beyond PhDs, e.g. professional doctorates such as DPAs. These should be considered as part of the overall postgraduate research environment wherever possible.

# 11. 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?

REF 2021 and UKRI funding may have been keen to promote interdisciplinary work but the REF 2021 experience turned out to be variable and distorting. REF 2021 was limited in its ability to systematically engage with interdisciplinarity (the flagging mechanism was not wholly successful and only a small percentage of papers were cross-referred). The present proposals do not look to be correcting this and as it stands, it is unlikely that they will encourage institutions to move towards supporting interdisciplinary outputs in their own right.

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

Multiple authored submissions are more of an issue in some REF UoA than others but mechanisms should be employed to ensure that co-authors are all genuine contributors and names are not simply added to papers to increase outputs.

**Impact Case Studies** See paragraphs 55-59 and 88-90 in particular in the REF 2028 initial decisions report: <a href="https://repository.jisc.ac.uk/9148/1/research-excellence-framework-2028-initial-decisions-report.pdf">https://repository.jisc.ac.uk/9148/1/research-excellence-framework-2028-initial-decisions-report.pdf</a>

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.

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

We support this change as it could help small units with narrow specialisms and therefore limited opportunity for providing multiple impact case studies. The change may also make these units more likely to be submitted and visible as part of UK research; Public Administration is a relevant case as limited numbers of dispersed PA scholars are often found in individual institutions.

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

The proposed approach reduces the number of case studies required to support larger units. This will disproportionately benefit those institutions with greater numbers of returned staff or those generating less applied research.

Revised thresholds could lead to less gaming of numbers, which is a good thing generally, and especially for ECRs.

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

The impact statement should help capture some broader impact activity which might not be captured within individual case studies. However, the 50% weighting for the statement for units with one case study is too high as it poses a high risk for small units or smaller institutions. It also has additional benefits for larger and more experienced institutions, rather than purely rewarding an environment for impact excellence.

#### **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. See paragraphs 39-42 in particular in the REF 2028 initial decisions report: https://repository.jisc.ac.uk/9148/1/research-excellence-framework-2028-initial-decisionsreport.pdf

16. 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.

As we stated in response to question 5 above, the importance of public service policy, delivery and assurance is demonstrated by its representation across a wide range of units of assessment included in REF 2021, for example A2, C13, C16, C17, C18, C19, C20, C21, C23 and D34. Our research indicates that 30-40% of the impact case studies in C17 (Business and Management Studies) have a public administration link. Government spending accounts for between 35-40% of UK GDP and employment in the UK public sector (excluding private or third Sector organisations that operate many public services) is 15-20% of the total workforce (and higher in the devolved regions).

New QAA Subject Benchmark Statements are currently being developed for Public Policy and Public Administration (UG and PG). This elevates the visibility of the disciplines. Further, the most recent Benchmark Statements for Business and Management (undergraduate and postgraduate) published in March 2023 make significant reference to management across all types of organisations "including, for example, public, private, non-profit, community-based and social enterprises". The content of undergraduate business and management degrees also, for the first time, note that graduates should reasonably be expected to be able to demonstrate knowledge, understanding and critical evaluation" in areas including:

"Public and non-profit management: the distinct roles and practices of public service organisations and the voluntary and community sector, including approaches to governance, financial management, public leadership, community empowerment, coproduction, public values and ethics and hybrid organisations for public service delivery."

We therefore suggest the following definition for the descriptor of the appropriate Unit of Assessment for REF 2028, and greater visibility for the discipline in forthcoming detailed REF guidance.

Public administration, in all of its forms and practices, includes (but is not limited to) public management, public leadership and public governance. It is the study of the planning, allocation, use and evaluation of public resources. In this way, public administration encompasses the institutional architecture and processes that are required to implement public policy.

It is important that all UoAs with strong links to public administration research, particularly UoA C17 Business and Management Studies; C19 Politics and International Studies and C20 Social Work and Social Policy, include this definition to ensure consistency and appropriate visibility.

### 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. See paragraphs 94-96 in particular in the REF 2028 initial decisions report: <a href="https://repository.jisc.ac.uk/9148/1/research-excellence-framework-2028-initial-decisions-report.pdf">https://repository.jisc.ac.uk/9148/1/research-excellence-framework-2028-initial-decisions-report.pdf</a>

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

The first point of note is that we are not 'out of Covid' as the proposals imply.

The current REF 2028 proposals are much the same as in REF 2021. They are at least useful in recognising the differential impact of the pandemic on individuals and disciplines. There is a case to argue that many public services were extremely challenged during the more active phases of the pandemic (e.g. health, social care etc.) and thus research with practitioners in those areas may have been disproportionately affected. Anecdotal evidence would suggest this is the case.

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

Covid-19 exacerbated the already large discrepancies in research capacity and resilience in the sector. Funding was focused in small areas and generated a bias in interest, citation and impact where research was related to or aligned to Covid. The response to covid lockdown and restrictions exaggerated existing bias in the system. PhD students, part-time and students with more complex backgrounds and non-traditional trajectories as well as academics and students identifying with protected characteristics and / or with caring responsibilities suffered disproportionately during Covid.

The 2028 regime should recognise the accumulated impact of this bias in funding and hence publications generated from that funding. The suggested light touch recognition of Covid-19's impact on individuals and disciplines is unlikely to fully capture this. A wider HESA investigation of how the pandemic and other economic/social stressors differentially affect different types of HEIs is required to fully unpack this issue. Covid disproportionately impacted part-time students particularly those in full-time employment and those studying post-experience. This was particularly

noticeable to UKAPA as a very high proportion of members' PhD and DPA students are part-time and employed in public service roles, which were particularly pressurised during the pandemic .

# **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.

19. 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?

Outputs published in Welsh they should be assessed in their language.

20. 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?

Yes