



Response to the Research Excellence Framework

Second consultation on the assessment and funding of research

Introduction

The University and College Union (UCU) is the largest trade union and professional association for academics, lecturers, trainers, researchers and academic-related staff working in further and higher education throughout the UK. We welcome the opportunity to respond to the second consultation on the Research Excellence Framework (REF).

UCU believes that the previous system – the Research Assessment Exercise (RAE) - has had a detrimental impact on the UK higher education system, leading to the closure of departments with strong research profiles and healthy student recruitment. The RAE has been responsible for job losses, discriminatory practices, widespread demoralisation of staff, the narrowing of research opportunities through the over-concentration of funding and the undermining of the relationship between teaching and research. Unless there are major changes to the current proposals, we fear that the REF will be even more disastrous for UK higher education.

Our consultation response focuses on a variety of practical issues for UCU members, including staff selection procedures, the number of outputs and the treatment of equality. It also addresses wider issues about funding selectivity and in particular the push from government for further research concentration. However, the main focus of the response is on the controversial plans to allocate 25% of the weightings to 'economic and social impact'. **Over seventeen and a half thousand academics, higher education professionals and researchers have signed a UCU petition calling for the UK funding councils to withdraw the impact proposals.** The list includes six Nobel Laureates, 80 Fellows of the Royal Society and over 3000 professors. We enclose the signatures alongside the detailed submission.

Assessing output quality (paragraphs 28-50)

Bibliometrics and peer review

In the previous consultation on the REF we raised a number of concerns about the bibliometrics proposals. We suggested that bibliometrics would result in a greater level of micro-management and analysis of staff citation performance as well as a further commercialisation of citation databases. We also highlighted a range of potential problems with data collection and quality control. It is clear that many of these quality-related problems were picked up in the pilot exercises conducted in 2008-9. We welcome the fact that the funding councils have acted on these pilots and concluded that “bibliometric indicators alone cannot provide a sufficiently robust measure of quality to drive funding allocations in any discipline” (paragraph 27c). Although we have raised concerns about the lack of academic involvement in the REF impact pilot exercise steering group we hope the current pilots on ‘economic and social impact’ will be as rigorous and independent as the bibliometrics exercise.

We are not complacent about the operation of the RAE peer review system. Elements of subjectivity are never entirely absent from a process based on academic judgement. However, subject-based peer review remains an essential, if imperfect, means of judging the quality of academic research. In relation to the REF panels the funding councils need to make sure that they are genuinely representative of the HE sector. For example, as well as international reviewers, the process needs to include people from interdisciplinary and multidisciplinary backgrounds and from new or ‘emerging’ research areas. In addition, peer review activities such as editing journals and participation in RAE and Research Council panels need to be better recognised at an *institutional* level. For example, promotion procedures should consider such work a contribution to the ‘academic public good’ to be valued alongside teaching and research work.

Selection of staff

Although we welcome the shift back towards direct peer review we continue to have major reservations about a research assessment process based on HEIs selecting particular academic staff for inclusion or non-inclusion. The 2008 RAE resulted in a significant

amount of unfair and punitive treatment of academic staff and we fear that similar practices will occur in the 2013 REF. Once again we urge the funding councils to revisit the recommendations of the 2002 Science and Technology select committee report on the RAE:

“Any future research assessment mechanism must be able to give a fair appraisal of the research without tempting universities to continue the divisive and demoralising practice of excluding some academics from the process” (The Research Assessment Exercise, paragraph 41).”

We welcome the recognition that certain groups of staff, including ‘early career’ researchers, part-timers and staff who for personal reasons might not have published during that period, will be able to submit fewer than the maximum number of outputs. However, the recent report from the Equality Challenge Unit highlights the continuing difficulties facing staff in these categories. We expand upon these arguments in the sections on research environment and equalities and diversity.

Selection of outputs

Rising workloads for academic and academic-related staff are a huge problem in higher education. Poorer student: staff ratios coupled with the pressure to bring in forms of external income add significantly to staff workloads and stress. Another major pressure is the need to publish regularly in ‘high impact’ journals, particularly to satisfy the requirements of external research assessment. As a result, we welcome the proposal to reduce the number of REF outputs from 4 to 3 (paragraph 36). We also support the idea of exploring the ‘double weighting’ of more substantive outputs such as monographs (paragraph 50).

Equalities and diversity (paragraphs 111-113)

According to the funding councils one of the overarching aims of the REF is “to promote equality and diversity”. Two recent reports on RAE 2008 indicate the challenges ahead. Firstly, a new statistical analysis by HEFCE shows that women academics were less likely to have been included in the 2008 RAE. With regard to ethnicity, the selection rate for Black staff was found to be significantly lower than all other ethnic groups (White, Asian, Mixed/other and Refused), whose selection rates were broadly at similar levels. The

second report – a qualitative study undertaken on behalf of the Equality Challenge Unit (ECU) – analysed RAE codes of practice and other RAE equality-related documentation. The report identifies a number of deficiencies with the equality process, such as non-existent or inadequate impact assessments, a failure to involve staff unions in the development of RAE codes of practice and inconsistencies in the treatment of ‘personal circumstances’.

On the back of the ECU report we support the proposal “to centralise the guidance on and process for handling individual staff circumstances to a greater extent than in the 2008 RAE”, including the establishment of a specialist group (paragraph 112). UCU has considerable expertise in this area and would wish to be formally involved in the group. At the same time, it is important to recognise that these reforms will not address the major inequalities in HE career structures.

Finally, the funding councils should conduct an equality impact assessment of the REF proposals. We believe that this is particularly important in relation to the new “economic and social impact” proposals (paragraphs 51-76). Subject and disciplinary biases within this process may have a disproportionate effect on particular groups of staff.

Assessing the impact of research (paragraphs 51-76)

The biggest problem with the consultation document is the proposal to base 25% of the REF on an assessment of the ‘economic and social impact’ of research. Over seventeen and a half thousand academics, higher education professionals and researchers have signed a UCU petition calling for the UK funding councils to withdraw the impact proposals. The current REF proposals risk undermining support for basic research across *all* disciplines as well as disproportionately disadvantaging research in the arts and humanities. For example, in a telling phrase the document suggests that ‘economic and social impact’ may be more applicable for disciplines that are ‘closer to market’ (paragraph 75). Below we outline the reasons why there is so much opposition to the impact proposals and suggest alternative proposals for the allocation of weightings.

Over the last few years there has been a big push by government departments and agencies to force academics to focus on the impact of their research. The UK Research Councils have led the way on this agenda. Applicants for research council grants now have

to submit an 'impact summary', answering questions about who might benefit from the research and how an economic return could be secured. In January 2009 the Government insisted that the funding councils, via the annual grant letter, steer the REF in the same direction, i.e. towards greater recognition of the impact research can make on business, the economy and society.

From a constitutional perspective, we are very concerned about how these proposals have emerged. HEFCE began its review of the RAE in early 2007. Impact assessment did not feature until the Secretary of State's funding letter of 22 January 2009 in which he emphasised that the REF should take better account of the impact research makes on the economy and society and gave examples of the sort of activities that he favoured.

We believe that this represents an unprecedented, direct interference by government in the content, nature and direction of the research carried out in our universities. It has been accepted for some years that government indicates broad priority areas of research which are taken into account by the research councils when they develop their funding programmes. However, the fundamental principle at the heart of the other side of the dual support system is that research is assessed through peer review on the basis of its intrinsic quality, not the changing policies of governments or the perceived needs of business.

We are not opposed to the notion of 'research impact'. For a number of years we have argued that research assessment systems need to recognise the importance of teaching and the educational experience. It is a shame that there is only a brief mention of the impact on teaching in the consultation document (paragraph 53b). Unfortunately none of the impact indicators listed in Annex D addresses the impact of research on undergraduate and postgraduate teaching and supervision.

While we all want to ensure that publicly-funded research benefits our economy and society, we believe it is counterproductive for government to make funding for the best research *conditional* on its perceived economic and social benefits. In general, the 'economic impact' agenda is founded on a lack of understanding of how knowledge advances. It is often difficult to predict which research will create the greatest practical impact. History shows us that in many instances it is curiosity-driven research that has led to major advances in the sciences and humanities. Although the REF proposals seek to measure retrospective impact, there is no real consensus on the issue of 'time-lags' in

research, i.e. the lengthy gaps between undertaking the research and its impact becoming evident (paragraph 55a).

The consultation document also identifies significant methodological challenges regarding 'attribution' and 'corroboration' (paragraph 55). One of the most extraordinary aspects of the current proposal is that this kind of impact assessment does not seem to have been tried or tested anywhere in the world. In this respect it was a shame that the HEFCE Rand Europe report ('Capturing research impacts: a review of international practice') was only published on the 9th December. According to this report the Australian Research Quality and Accessibility Framework (RQF) – which was abandoned in 2007 as a result of a change of government - provides "an obvious basis to develop an impact module for the REF" (p.17). However, the report says that the 'impact indicators' developed within the RQF are "not sufficiently developed and tested to be used to make funding decisions" (p.55). In addition, only 10% of funding decisions were meant to be influenced by the RQF impact assessment (p.4). In this context, HEFCE's proposal to allocate potentially 25% of Quality-Related (QR) research funds, on the basis of what the Higher Education Policy Institute have called an "untested and experimental process", seems foolhardy in the extreme.

Whilst we welcome the recognition of the limitations on the extent to which "the impacts of research can be 'measured' through quantifiable indicators" (paragraph 55c), the impact submissions will lead to additional burdens on institutions and panels. For example, there is the proposal for a new cadre of 'user' (associate) panel members. We would like to know how this chimes with the government's original goal of reducing the bureaucracy associated with a peer review system, particularly as this was the main motivation for the government's proposal in 2006 for a 'metrics-based' assessment.

Recognising applied research

We would like to address the issue of 'applied' research and its relationship with the impact proposals. UCU is a strong supporter of both basic *and* applied research. One of the reasons why we questioned the value of citations as a quality indicator for research was its limited relevance for applied research, e.g. in subjects such as engineering.

In the 2008 RAE we welcomed the instruction to panels to give equal weighting to all research, whether basic or applied and to focus upon quality of outputs. Likewise, we welcome the reiteration in the current REF proposals regarding the eligibility of outputs, i.e. 'grey literature' and outputs that are not in conventional published form, such as confidential reports to government or business, software, designs, performances and artefacts will be eligible for submission (paragraph 38). This should build on the procedures for the RAE 2008 in which:

“Panels gave full recognition to the quality of work of direct relevance to commerce and industry, as well as to the health, public and voluntary sectors. Where appropriate, panels included research users and practitioners from these sectors” (RAE 2008 Managers Report, April 2009, p.36).

In the last RAE a bigger problem was the small number of pieces of applied work that were submitted (RAE 2008 Managers Report, p.50). In the next exercise more needs to be done to encourage HEIs to submit pieces of applied work for the REF. However, we do not believe that untested, subject-wide impact proposals are the appropriate mechanism to address the under-representation of applied outputs in previous RAEs.

Economic impact and the commercialisation of research

As a professional association we have wider concerns that impact factors will lead to the further commercialisation, and therefore narrowing, of the research agenda. Although there are references to “culture or quality of life” in the REF document, the impact agenda is most likely to focus on narrow economic goals. For example, it is noticeable how many of the impact indicators listed in Annex D revolve around “creating new businesses”, “commercialising new products or processes” and “attracting R&D investment from global business”. In our view, these types of indicators are better assessed through the Higher Education Innovation Fund (HEIF) and comparable funding streams in other parts of the UK rather than through core research funding. We regret the fact that higher education is essentially being asked to fill the gap left by the low-level investment in research and development of British companies. Research outputs that attempt to understand our world should be evaluated by the quality of their contribution to human knowledge, not on their contribution to company balance sheets.

UCU believes in the importance of research-led public policy. In fact, one of the barriers to closer working is the government's increasing refusal to engage with research evidence. What is clear from the recent sacking of Professor David Nutt as the head of the Advisory Council on the Misuse of Drugs is that impact does not depend upon research quality, but on policy expediencies. It is partly for these reasons that we have reservations about the REF impact proposals on public policy. Our fear is that the new system will be biased towards work that is supportive rather than critical of government policy. For example, in controversial areas such as migration, crime, terrorism and welfare reform, REF impact indicators are likely to reward those scholars 'working with the grain' of official policy.

Consequently, the potential for the REF to undermine the ability of academics (under the 1988 Education Reform Act) "to question and test received wisdom and put forward new ideas and controversial or unpopular opinions, without placing themselves in jeopardy of losing their jobs or privileges they may have at their institutions" is greatly increased. It would be a disaster for the UK if it lost its reputation for independent critical research across a wide range of disciplines through what seems to be a narrower, instrumental approach to research evaluation and funding. Universities are the sole institutions in our societies that have a mandate to pursue knowledge for its own sake. They must continue to be spaces in which the spirit of adventure thrives and where researchers enjoy academic freedom to push back the boundaries of knowledge in their disciplines. In this, we commend the views of Drew Gilpin Faust, the President of Harvard University:

"Higher education is not about results in the next quarter but about discoveries that may take — and last — decades or even centuries. Neither the abiding questions of humanistic inquiry nor the winding path of scientific research that leads ultimately to innovation and discovery can be neatly fitted within a predictable budget and timetable" ('The University's Crisis of Purpose, New York Times, 1 September 2009)

For these reasons we recommend that the funding councils withdraw the current impact proposals and work with academics and researchers on creating a funding regime which supports and fosters basic and applied research in our universities and colleges rather than one which discourages it. In terms of a specific recommendation, we suggest that 80% of the REF weighting is given to academic outputs, with the remaining 20% allocated on the basis of a revised 'research environment' procedure (see the section below).

The research environment (paragraphs 77-81)

UCU welcomes the recognition of the 'research environment' as a distinct element in the assessment process. We propose that the weighting attached to the research environment is increased from 15% to 20%. However, we have a number of suggestions regarding the relative importance of the three areas: resourcing, management and engagement.

Resourcing

Infrastructure and facilities are an important element in assessing the resource base of a submitted unit. However, we are opposed to the idea of 'critical mass' being considered within the environment element of the REF. It is part and parcel of a government agenda, including the creation of the EPSRC's Doctoral Training Centres and the AHRC's Block Grant Partnership Scheme, to concentrate research resources in a small number of institutions. If allowed to go unchecked it will mean that HEIs will be very differently placed when the research environment is evaluated in the REF. This is a serious equity issue and flies in the face of the considerable 'pockets of excellence' across a wide range of UK HEIs in the 2008 RAE (e.g. top-rated research was found in 150 of the 159 institutions that took part). In terms of the funding councils it would be productive if future funding arrangements attended to supporting 'emergent' pockets of excellence rather than attempting to engineer excellence through the concentration of resources.

The results of the 2008 RAE showed that high quality research is distributed throughout the higher education sector. As a result, UCU is opposed, either on grounds of fiscal rationing or mission group 'special pleading', to the campaign for "more research concentration where institutions are strongest" (Higher Ambitions, p.4). Further concentration of research funding would carry with it the risk of reduced research capacity for some regions, greater differential experiences for students and a reduction in the diversity of the UK's research base.

In fact, investment in future and potential success is just as important a part of the process of funding research as is investment in existing excellence. In order to counterbalance to some extent the concentration effect of research selectivity, we believe there should be a 'seedcorn' fund available to university researchers for starting up new programmes.

Management

One of the specific aims of the REF is to “support better management and sustainability of the research base” (paragraph 15f). Within the research environment section we welcome the specific emphasis on support for research staff, particularly ‘early career’ researchers, and also on the training of postgraduate research students. Unfortunately, the current research funding system, including the RAE/REF, continues to reinforce inequalities between permanent and fixed-term academic staff. For example, a number of fixed-term research staff were excluded from RAE 2008 on technical grounds and at some institutions they are not being included in REF profile exercises. We urge the funding councils to enable the genuine participation of fixed-term staff in the 2013 REF. We recommend that within the REF research environment section, additional weighting be given to how well universities are doing at keeping and developing their research staff. As with the proposal for encouraging researcher mobility (paragraphs 109-110), supporting research staff should become a specific policy aim of the REF.

Engagement

We welcome the emphasis on engagement in the assessment of the research environment process. We feel that this is the most appropriate place for the panels to recognise work with research users. It is also important that the notion of user involvement covers a multiplicity of groups. For example, ‘economic stakeholders’ should include community groups, voluntary organisations, trade unions and NGOs – and not simply employers.

Overall assessment outcomes (paragraphs 82-86)

UCU recommends the following weightings:

Outputs: 80%

Environment: 20%

Panel structure and consistency (paragraphs 87-98)

Whilst we understand the desire to reduce the burden on panel members and chairs and to encourage greater consistency across subjects, we have reservations about the proposal to reduce the number of units of assessment substantially. It is important that academics

are confident that the REF panels have sufficient breadth of knowledge and expertise to assess the value of individual specialisms. Even with 66 Units of Assessment we received reports that, in some areas, disciplinary orthodoxies were leading to the marginalisation of radical or unorthodox perspectives. In an REF system with substantially fewer UoAs we fear these trends will be intensified. We urge the funding councils to rethink the proposal to reduce the numbers of REF panels.

UCU

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