
REF 2019/05
August 2019

Consultation on the draft guidance and criteria

Summary of responses

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Executive summary

Purpose

In July 2018, the UK higher education funding bodies in England, Scotland, Wales and Northern Ireland published a joint consultation on (i) the 'Draft guidance on submissions' (REF 2018/01) and (ii) the 'Draft panel criteria and working methods' (REF 2018/02) for the Research Excellence Framework (REF) 2021 exercise. This document summarises our analysis of the 294 formal responses received.

Key points

The 'Draft guidance on submissions': set out the draft framework and generic criteria for assessment in REF 2021; specified content, data requirements and related definitions for submissions to REF 2021; and guided higher education institutions (HEIs) on policy and practical matters when preparing submissions. The 'Draft panel criteria and working methods' set out the draft assessment criteria and working methods of the main panels and sub-panels for REF 2021.

The consultation sought views on the following aspects of, and topics addressed in, the 'Draft guidance on submissions' and the 'Draft panel criteria and working methods':

- clarity of the guidance
- clarity and appropriateness of the assessment criteria
- staff eligibility
- equality and diversity (E&D)
- output eligibility
- research activity costs for unit of assessment (UOA) 4 (Psychology, Psychiatry and Neuroscience)
- balance between consistency and allowing for discipline-based differences.

The responses informed the final 'Guidance on submissions' (REF 2019/01) and the final 'Panel criteria and working methods' (REF 2019/02) published in January 2019.

Responses broadly welcomed the draft guidance and criteria as clear and appropriate but views were more mixed regarding:

- proposals relating to staff circumstances
- the proposal to make ineligible the outputs of former staff who have been made redundant
- proposed methods to capture research activity costs in UOA 4.

To

Heads of Research England
– funded institutions

Heads of universities in
Northern Ireland

Heads of higher education
institutions in Scotland

Heads of higher education
institutions in Wales

Heads of alternative
providers in England

Subject associations

Organisations with an
interest in commissioning
and using academic
research including
businesses, public sector
bodies, charities and other
third sector organisations

Of interest to those responsible for

Research, planning

Reference

REF 2019/05

Publication date

August 2019

Enquiries to

Gina Reid

tel 0117 931 7392

email info@ref.ac.uk

Responses expressed broad support for the deeper integration of E&D into REF 2021, although there were requests for further clarity and amendments were suggested in this area.

Overall, many responses sought further guidance and clarity, particularly on the following aspects of the guidance:

- significant responsibility for research
- staff circumstances
- continued impact case studies
- the institutional-level environment pilot
- cross-referral
- interdisciplinary research (IDR)
- panel membership
- overlaps between research areas within specific UOAs.

Action required

This document is for information.

Introduction

1. In July 2018, the UK higher education funding bodies in England, Scotland, Wales and Northern Ireland published a joint consultation on the 'Draft guidance on submissions' and the 'Draft panel criteria and working methods' for the REF 2021 exercise. The REF is the UK's system for assessing the quality of research in its HEIs; the exercise first took place in 2014, replacing the previous Research Assessment Exercise, and will next be conducted in 2021.
2. The first of these two documents, the 'Draft guidance on submissions', set out both the draft framework and the generic criteria relating to assessment, specified content, data requirements and related definitions for submissions to REF 2021, and guided HEIs on policy and practical matters in preparing submissions.
3. The second document, the 'Draft panel criteria and working methods', set out the assessment criteria and working methods that the main panel and sub-panels for REF 2021 will use.
4. The consultation ran from 23 July to 15 October 2018.
5. This document summarises the REF team and the panel secretariat's analysis of the responses received. These responses informed the final 'Guidance on submissions' and the final 'Panel criteria and working methods', both published in January 2019. In total we received 294 formal responses to the consultation, from a broad range of stakeholders across the HE sector (see Table 1 below).
6. All responses received by the deadline were read, recorded and analysed. This document summarises the key issues they raised. Unless otherwise specified, percentages and proportions refer to the pool of those who responded to the relevant question(s).

Responses from	Number
Individuals	28
Businesses	2
Charities	11
Departments or research groups	14
HEIs	127
Public sector organisations	3
Representative bodies	22
Subject associations or learned societies	70
Others	17
Total	294

Table 1: Sources of responses to the consultation

Summary of responses to the consultation

This section considers, in turn, the two documents on which the consultation was undertaken: the 'Draft guidance on submissions'; and the 'Draft panel criteria and working methods'. It summarises the responses received in relation to each part/section of those documents.

Guidance on submissions

Part 1: Overview of the assessment framework

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

Response	Count	Percentage
Strongly agree	24	10%
Agree	175	75%
Neither agree nor disagree	24	10%
Disagree	6	3%
Strongly disagree	3	1%
Grand Total	232	100%

Table 2: Responses to Question 1

7. There were 232 responses to this question. 85 per cent of respondents either agreed or strongly agreed that the guidance set out in 'Part 1: Overview of the assessment framework' was clear, while four per cent of respondents disagreed or strongly disagreed and ten per cent neither agreed nor disagreed.
8. Additional comments were provided by 142 respondents. These tended to suggest areas where further clarity or consistency might be useful, and often discussed other specific areas of the guidance beyond the overview. A number of comments provided positive feedback, for example noting that the rationales provided for the decisions taken in the guidance were useful, that the inclusion of a timetable was helpful, and that the principles outlined for REF 2021 were clear. A small number of respondents noted that the guidance made clear the differences between REF 2014 and REF 2021 and that consistency with some areas of REF 2014 was positive. A small number commented that the draft guidance reflected the conclusions of the Stern Review of the REF.
9. Nearly 20 per cent of those who commented requested further clarification on specific aspects of the guidance, including on: outputs of former members of staff; the definition and identification of Category A staff; the eligibility of HEIs to submit to REF 2021; calculation of the number of outputs required in a submission; publication of submissions after the REF 2021 exercise; analysis on E&D to be undertaken by the funding bodies; the use of Higher Education Statistics Agency (HESA) data; and the relationship of impact case studies to the submitting UOA.

1. Percentages in tables may not sum to 100 due to rounding.

10. Around 12 per cent of comments discussed the language and form of expression used in the guidance. In particular, there were requests for further clarity on certain terms and definitions and for examples of certain scenarios. Suggestions were also offered on areas that were potentially complex or confusing as currently drafted. A small number of commenters made suggestions to improve the formatting and structure of the guidance.
11. Around ten per cent of comments related broadly to E&D, often discussing other areas of the guidance. These included requests for: E&D training for institutions; guidance on how to assess equality impacts fairly; guidance on what evidence could be used to demonstrate E&D considerations; and further clarification on protected characteristics. A small number of those commenting were concerned that the measures in the guidance relating to individual staff circumstances were not promoting equality. A small number of comments were also made about the representativeness of panel membership. A small number also suggested that HEIs not delivering adequately in terms of E&D should face repercussions.
12. Small numbers of comments related to: the timetable for REF 2021, particularly noting concern around timings; requests for further clarity on panel assessment procedures; the assessment of interdisciplinary research and double-weighted outputs; and general concern (predominantly from HEIs) around the burden on institutions for REF 2021. Small numbers of commenters also discussed REF's general cost efficiency; multiple submissions; the implications of the General Data Protection Regulation (GDPR); specific matters relating to UOA 4; ways in which the REF could measure the value of research to the public; and how panels will use staff-related data.

Part 2: Submissions

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

Response	Count	Percentage
Strongly agree	25	10%
Agree	168	66%
Neither agree nor disagree	39	15%
Disagree	18	7%
Strongly disagree	4	2%
Grand Total	254	100%

Table 3: Responses to Question 2

13. 254 respondents answered this question. Just over three quarters expressed broad agreement that the guidance set out in 'Part 2: Submissions' was clear, while nine per cent felt it was unclear. Substantive additional comments on a range of issues were provided by 164 respondents.

14. IDR attracted the highest volume of comments, with around one-third of all those commenting on Question 2 doing so on this specific topic. There was a high level of support for the increased focus on IDR within REF 2021, although a number of issues and concerns were raised. Around one-third of those commenting on IDR felt the guidance was insufficiently clear, particularly in terms of the definition and assessment of IDR, the roles of panel members and advisers, and the differences between IDR and cross-referral. Comments also called for increased consistency on IDR between the 'Guidance on submissions' document and the 'Panel criteria and working methods' document. A small number sought reassurance that IDR will be assessed on its merits as research rather than on its fit with the submitting UOA. A similar number sought guidance on the use of the IDR identifier. It was also suggested that IDR-relevant information be provided as a single, separate document to supplement the advice currently spread across the 'Guidance on submissions' and the 'Panel criteria and working methods' documents.
15. Just under 30 per cent of those commenting discussed open access (OA). There was a high degree of support for OA, although specific concerns and suggestions for refinement were also made. Around 20 per cent of those commenting on OA identified a need for greater clarity and guidance, including suggestions that information for REF 2021 be provided in a separate document and that information on audit be made available as soon as possible. Those commenting felt the ability to apply an OA exemption to staff who have moved from a former institution is positive in instances where the new HEI is unable to confirm an output's OA compliance, although a few sought further clarity on this. A small number raised concerns that recognising units and HEIs which go 'over and above' OA policy requirements may risk favouring institutions with greater resources and would negatively affect disciplines with more restrictive publishing arrangements, particularly in practice-based disciplines. A small number of respondents raised concerns over the utility of SHERPA dates and the use of acceptance date over publication date, and noted that HEIs should not be penalised for acting in good faith in instances where journals change their OA policy.
16. In total, 27 per cent of comments concerned the use of HESA data to cross-check the mapping of staff onto UOAs. Over two-thirds of those commenting on this were not supportive of the measure. Comments queried how robust this approach would be, noting particularly that HESA cost centres do not map neatly onto UOAs and are principally focused on teaching rather than research. It was also noted that using HESA data may map staff onto UOAs in which an HEI is not submitting and that the approach may hinder interdisciplinary working within an HEI. More than two-thirds of those commenting also requested clarification on what would constitute a significant anomaly between a UOA and a HESA cost centre to trigger audit, given that the lack of fit between HESA cost centres and UOAs could lead to significant disruption and burden in the event of audit. A very small number of comments noted that HESA data could be used to identify staff contract changes in terms of staff excluded from REF 2021, which would require the cross-checking of data from previous years' HESA returns.

17. Around 13 per cent of comments concerned multiple submissions, joint submissions and small units. A significant minority of those commenting on multiple submissions noted apparent conflicts between the 'Guidance on submissions' document and the 'Panel criteria and working methods' document. A similar number felt the criteria for multiple submission requests were not sufficiently clear and that the decision deadlines made the overall timeframe too tight for HEIs to manage instances of refused requests. Smaller numbers noted that changes to multiple submissions for REF 2021 will be disruptive as HEIs will have based their plans on the REF 2014 policy, and that multiple submissions should generally be accepted, particularly where disciplinary fields are broad. Although many of those commenting on small units welcomed the ability to request exception for these, greater clarity was sought over the criteria for small-unit exception. A small number of respondents were concerned that this approach might act against the interests of small units and their staff if they were excluded from submissions. A small number also felt the deadlines for decisions in response to requests for small-unit exception were unhelpful as they did not give HEIs sufficient time to respond in cases where requests were refused.
18. A small number of comments discussed the submission formats of outputs, particularly to seek clarity on DOIs and physical outputs. A small number also discussed the submissions system, often raising concerns that this would be made available too late in the development process to allow for full testing. Small numbers of comments were also provided on the following topics: requests for further guidance on GDPR and data protection; expression of a generally positive attitude to the increased focus on E&D; acknowledgment of the additional burden of producing codes of practice; and questions around scoring consistency for outputs submitted across more than one UOA. A small number stated that it should be clearer that the survey of submission intentions is provisional rather than binding, should include an indication of likely IDR outputs and that it may be harder for new REF entrants to complete since they will not have data from previous exercises.

Part 3, Section 1: Staff details

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

Response	Count	Percentage
Strongly agree	27	11%
Agree	155	62%
Neither agree nor disagree	41	16%
Disagree	20	8%
Strongly disagree	6	2%
Grand Total	249	100%

Table 4: Responses to Question 3

19. There were 249 responses to Question 3. Just under three-quarters of respondents broadly agreed that the guidance set out in 'Part 3, Section 1: Staff details' was clear, while ten per cent broadly disagreed. Additional comments were provided by 150 respondents.

20. Over one-quarter of those commenting referred to the requirements for demonstrating a substantive connection to the submitting unit for staff with a contract of employment between 0.20 to 0.29 full-time equivalent (FTE). Most of these comments came from HEIs and covered a range of views including: support in principle for the measures; requests for further clarification; suggestions for refining the process; and concerns about burden and 'game-playing'. Others welcomed measures to address game-playing.
21. Around one-quarter of those commenting referred to the guidance on significant responsibility for research (SRR). Over half of these sought additional clarity and guidance on SRR and several raised comments on the indicators of SRR, including suggestions for refining and implementing them.
22. Around one-fifth of those commenting mentioned unintended consequences of proposed policies relating to staff. They particularly focused on the processes for identifying SRR, which they felt could lead to selectivity, game-playing or variation in practice between institutions. A few also raised concerns about burden and the effects of the SRR approach on certain HEI types and disciplines.
23. A similar number discussed data requirements for former staff. These comments primarily focused on the issue of which FTE to record if multiple contracts were held, although a few also commented on general data requirements, raised questions over consent and requested some further clarifications.
24. A similar number again commented on staff eligibility. Around half of the comments about staff eligibility related to concerns about the eligibility of senior staff who are research-active but not employed on 'research only' or 'teaching and research' contracts. Others requested further clarity on the eligibility of hourly-paid staff and where a staff member concurrently employed at two HEIs is serving a notice period at one of these.
25. Around 16 per cent of those commenting discussed early-career researchers (ECRs). Several welcomed the provisions and guidance relating to ECRs, while others identified issues with the definition of an ECR.
26. Around 13 per cent of those commenting discussed codes of practice, particularly with respect to the clarity of the guidance and the deadline for submitting codes.
27. Small numbers of respondents requested further clarity on removing staff through audit and on general audit processes, and expressed concerns about contract changes.

Question 4: 'Do you have any comments on the clarity, usefulness or coverage of the list of possible indicators of research independence?'

28. There were 180 responses to Question 4, with 109 from HEIs, 36 from subject associations or learned societies and 12 from representative bodies. Fewer than ten comments came from charities, individuals, businesses, or departments and research groups. Around 17 per cent of those commenting on Question 3 referred specifically to research independence, reflecting the comments made by those commenting on Question 4.
29. Over half of respondents to Question 4 felt the list of fellowships with research independence and/or the criteria for research independence were appropriate or useful. Most of those welcoming the list and the criteria were HEIs. Just under 15 per cent of respondents, most of which were HEIs, supported the provision of a list of fellowships that do not demonstrate research independence. A small number of commenters indicated that a list of criteria signalling an absence of research independence may be useful and

suggested the list of fellowships with research independence be regularly updated to ensure accuracy. A small number also raised questions relating to internal funding, fellowships and grant schemes in the context of research independence. A small number noted that some fellowships have a transition to independence, while others noted that it may be possible to 'lose' research independence.

30. Around 15 per cent of respondents were concerned that the list of fellowships with research independence and the independence indicators may be limiting or create confusion. One-third of such responses indicated that it was unclear how many indicators needed to be met for an individual to have research independence. Others thought it should be made clearer that the list of fellowships was indicative rather than exhaustive. Concerns were also raised that an incomplete list may encourage institutions to 'game' the process of identifying research independence, although it was not always clear whether respondents were referring to the list of fellowships or to the independence indicators.
31. Many comments concerned specific indicators of research independence. Almost 20 per cent of respondents expressed concern or confusion about the 'significant input into the design, conduct and interpretation of the research' indicator. The majority of such comments were from HEIs. Generally, those commenting considered this indicator too vague, a poor determinant of independence and too open to differences in usage and implementation across HEIs. A small number raised concerns about the 'leading a research group or substantial work package' indicator.
32. Around 15 per cent of those commenting noted that there are variations in research independence across disciplines and career stages, particularly in the context of Main Panel D as many of the indicators of independence were felt to be more applicable to science, technology, engineering and mathematics (STEM). A small number also felt there was too much emphasis on research funding as a marker of independence; again, this was particularly notable in the context of Main Panel D.
33. Smaller numbers of respondents commented on the following issues, with further guidance requested: post-doctoral researchers in the context of research independence; co-investigator status as a marker of research independence, particularly in disciplines where they may make significant contributions on research grants; practice-led outputs and creative disciplines; potential inclusion of 'supervision of doctoral researchers' as an indicator of independence; and issues of research independence in relation to 'research only' and 'teaching and research' contracts. Small numbers of respondents raised concerns that the criteria and the list of fellowships may advantage research-intensive institutions.

Question 5: 'Do you agree with the proposed eligibility of seconded staff?'

Response	Count	Percentage
Yes	201	85%
No	7	3%
Other	29	12%
Grand Total	237	100%

Table 5: Responses to Question 5

35. There were 240 responses to Question 6. Just over 60 per cent of respondents agreed with the proposed ineligibility of staff based in a discrete unit or department outside the UK, while just under one-quarter disagreed with the proposal and 15 per cent neither directly agreed nor disagreed.
36. In total, 100 respondents offered further comment on this question. Around 17 per cent of those who agreed with the proposed ineligibility of non-UK based staff made a comment, and these respondents tended to agree with the rationale for the proposal and the concerns about burden and game-playing. Of those disagreeing with the proposal, 91 per cent offered further comments, constituting over half of all comments on this question. Their comments highlighted the proposal's disproportionate effects on particular disciplines (especially tropical medicine), stated that administrative process should not dictate eligibility and flagged the wider international context of research funding in the UK.

Part 3, Section 1: Staff circumstances

Question 7a: 'The proposed approach for taking account of circumstances will achieve the aim of promoting E&D in REF 2021.'

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

Question 7c: 'Please provide further comments on these proposals, including any suggestions for clarifying or refining the guidance.'

37. There were 249 responses to Question 7a, with 46 per cent broadly agreeing that the proposed approach to taking account of staff circumstances will achieve the aim of promoting E&D in REF 2021. Just under 30 per cent broadly disagreed, with the rest neither agreeing nor disagreeing. Table 8 below shows responses broken down by respondent type.

Response	Count	Percentage
Strongly agree	15	6%
Agree	99	40%
Neither agree nor disagree	66	27%
Disagree	45	18%
Strongly disagree	24	10%
Grand Total	249	100%

Table 7: Responses to Question 7a

Response	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	No response	Grand total
Individual	11%	25%	14%	4%	11%	36%	100%
Business			50%			50%	100%
Charity		36%	18%	18%	9%	18%	100%
Department or research group	14%	43%				43%	100%
Public sector		33%				67%	100%
Representative body		50%	14%	18%		18%	100%

Table 8: Responses to Question 7a by respondent type

38. Question 7b received 243 responses, with 43 per cent agreeing or strongly agreeing that the potential advantages of the proposed changes to the approach to staff circumstances outweighed potential drawbacks. Just under 30 per cent of respondents disagreed, with the rest neither agreeing nor disagreeing. Table 10 below shows responses by respondent type.

Response	Count	Percentage
Strongly agree	20	20
Agree	86	86
Neither agree nor disagree	68	68
Disagree	44	44
Strongly disagree	25	25
Grand Total	243	243

Table 9: Responses to Question 7b

Response	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	No response	Grand total
Individual	11%	14%	29%	7%	4%	36%	100%
Business			50%			50%	100%
Charity	11%	14%	29%	7%	4%	36%	100%
Department or research group	11%	14%	29%	7%	4%	36%	100%
Public sector		33%				67%	100%
Representative body	11%	14%	29%	7%	4%	36%	100%
Learned society	11%	31%	20%	11%	1%	24%	100%
Other	12%	29%	6%	6%	18%	29%	100%

Table 10: Responses to Question 7b by respondent type

39. Additional comments on one or more of Questions 7a, 7b and 7c were made by 198 respondents. As the themes of these comments are applicable across all three questions (particularly because many respondents chose to add the same response to the comments section of all three questions), they are summarised together below.
40. Around one-quarter of those commenting supported the proposed approach and its expected outcomes. These comments included welcome of the mechanisms to take account of individual staff circumstances and an advanced process to request staff circumstances, as well as general approval of the clarity of the guidance. Seven per cent of commenters specifically noted that the proposals' drawbacks, particularly administrative complexity and sensitivity of disclosure, were outweighed by the importance of recognising individual circumstances and their effect on staff capacity to produce outputs, as this is necessary to level the playing field of research achievement and to advance E&D. A small number noted that the administrative burden resulting from these proposals will be no greater than in REF 2014. A small number also noted that the proposals will have a positive impact on recruitment behaviour towards staff whom have fewer outputs due to circumstances. Just under 20 per cent of those commenting specifically noted their support for the ability to request the removal of the minimum of one output requirement due to staff circumstances.

41. Commenters also raised a number of issues relating to the proposals on staff circumstances. Just under half raised concerns that the proposals would add significant administrative complexity both for institutions and for individuals at a late stage in the REF cycle. These comments came predominantly from HEIs. Just under one-third of comments expressed concern that sensitive personal circumstances would have to be disclosed, and highlighted the handling of sensitive data. Again, these comments came primarily from HEIs. Just under 30 per cent of comments raised the concern that the proposals would have a negative impact, or no impact, on E&D. A similar number expressed concerns focused on: the timing of circumstances requests, particularly in terms of whether the proposed March 2020 deadline would disadvantage staff employed, or who have circumstances occurring, after this date; whether the timing would be challenging both for HEIs and for EDAP assessment; the timing of notification of decisions on requests; and whether institutions would be able to check if staff had had circumstances requests approved at previous institutions. Around one-quarter of those commenting were unclear how reductions could be linked to individuals, while one-fifth felt the proposals were at odds with the principles of the Stern Review of the REF.
42. Just under 20 per cent of those commenting expressed concern that staff would be pressured to disclose circumstances, while just under ten per cent felt there were no or limited incentives for staff to disclose them. Just under 20 per cent of respondents also expressed concern that the proposals would introduce scope for game-playing, that they would lead to underrepresentation of staff with circumstances in submissions or to a concentration of outputs among certain staff members, and that the optional nature of staff circumstances could lead to inconsistency in the treatment of staff. A small number also felt the proposals had lost sight of the REF's primary purpose to assess research quality and were too difficult to evidence or audit.
43. The vast majority of those who commented on Questions 7a, 7b and 7c, including those who agreed and disagreed with the proposals, indicated areas in which the policy might be changed or the guidance clarified to better account for the issues and concerns they raised. The most common suggestion, made by a quarter of those commenting (most of which were HEIs), was to amend the tariffs for output reductions due to individual circumstances. Comments included suggestions to amend the tariffs in general as well as specific suggestions relating to the tariffs for parental leave, secondments and ECRs. Those commenting also suggested there should be the ability to remove the minimum of one output requirement for those who have produced an output during the period and for individuals with certain kinds of circumstance, such as parental leave and ECR status.
44. Other suggestions for revising the proposals included: reversion to the proposals outlined within the Decisions on staff and outputs (REF 2014/04) (16 per cent); HEIs using data already held to apply reductions for circumstances such as ECR status and career breaks (11 per cent); requests for staff circumstances only to apply to small units below a certain size or to units with a defined proportion of staff with circumstances (11 per cent); and inviting HEIs to articulate their approaches to circumstances more strongly, through equality impact assessments, codes of practice and their environment statements (ten per cent).

45. A small number of comments (mostly from HEIs) suggested the following revisions: the timing of the requests process should be adjusted; HEIs should all follow a common approach to the use of circumstances; there should be provision for reductions to the number of impact case studies required due to staff circumstances; there should be a clear connection between agreed reductions and the number of outputs submitted for the individual concerned; EDAP should only consider circumstances requiring a judgment; HEIs should manage staff circumstances internally by default and only make reduction requests exceptionally; there should be no restriction on the number of outputs submitted for staff for whom circumstance reductions are applied; and a formula should be used to calculate reductions for each unit.
46. Comments on Questions 7a, 7b and 7c also requested further clarity in several areas. Again, these comments came predominantly from HEIs. Clarity was particularly requested on the expectations surrounding the data HEIs will need to collect in relation to staff circumstances and on whether guidance around staff circumstances means that HEIs should approach the selection of outputs in terms of quality or on demographic representativeness. Smaller numbers requested clarity on when HEIs would be informed regarding: whether requests for reductions due to staff circumstances had been approved; funding bodies' expectations for codes of practice and equality impact assessments; and how rounding will work, given that some reductions tariffs suggest a 0.5 reduction. Small numbers also requested further clarity on: whether there will be a maximum number of outputs that can be submitted in relation to an individual for whom circumstances have been applied; whether reductions can be used to account for reduced productivity of other staff in a unit or should apply to the individuals concerned; whether approved reductions must be used; whether there is separation between unit reduction requests and requests for the removal of the minimum of one output; and whether any REF-specific E&D training will be made available to institutions. A small number also requested overall simplification of the guidance and the inclusion of worked examples or flow charts.

Part 3, Section 2: Research outputs

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

Response	Count	Percentage
Strongly agree	19	8%
Agree	153	63%
Neither agree nor disagree	38	16%
Disagree	30	12%
Strongly disagree	3	1%
Grand Total	243	100%

Table 11: Responses to Question 8

47. Question 8 received 243 responses. Just over 70 per cent of respondents broadly agreed that the guidance in 'Part 3, Section 2: Research outputs' was clear, while 13 per cent disagreed and approximately 16 per cent neither agreed nor disagreed.
48. Additional comments to Question 8 were provided by 157 respondents. OA requirements were the most commented-on issue, discussed by almost half of commenters. A large number of the comments on OA requested further clarity on audit requirements and there was some confusion surrounding how the 'Draft guidance on submissions' related to previous guidance and policies on OA. Nearly 30 per cent of those commenting discussed the tolerance band for non-OA-compliant outputs. Incorporation of a tolerance band was broadly welcomed, although one-third of those discussing OA raised concerns that setting the band at five per cent of outputs would disadvantage small units and disciplines with a smaller range of in-scope outputs. It was suggested that a higher tolerance be introduced or that a corresponding number of outputs should be permitted to be non-compliant. There was some confusion over whether the tolerance band applied at UOA or institution level, with preference for the latter.
49. Comments were made on a variety of other OA-related issues. 13 per cent of all those commenting discussed Gold OA, particularly to query how 'immediately after publication' would be defined and could be audited, especially when some issues regarding output availability are not within HEIs' control. Clarity was also requested on the definition of Gold OA more generally. Smaller numbers of comments were made on dates of acceptance and publication, generally calling for clarity on definitions and noting that these terms are not always used consistently across journals. A small number of comments also discussed the exceptions to OA compliance, particularly to request clarity on whether, for new staff, HEIs must check the compliance of outputs published at a previous HEI. Those commenting on OA generally supported proposals for the eligibility of pre-prints for submission to REF 2021 but again requested further guidance.
50. Just under 20 per cent of those commenting, predominantly HEIs, discussed output eligibility in relation to staff status. Two-thirds of these comments related to former staff and particularly centred on calls for the use of date of acceptance to determine output eligibility, in order to allow submission of posthumous outputs and outputs of retired staff (where these were accepted while the staff member was employed as Category A eligible). Others noted it was burdensome to determine the eligibility of the outputs of former staff and that clarity is required on the eligibility of outputs published after the census date when an individual moves from one HEI to another after that date. The remaining one-third of comments on eligibility and staff concerned PhD students and ECRs. Some confusion surrounded the eligibility of outputs produced by PhD students, there was concern that ECR outputs might be lost if published while an ECR was on a teaching-only contract and there was a general call for clarity around Category A eligible staff undertaking PhDs.

51. Around 20 per cent of those commenting discussed output versions. Just over half of these comments, all made by HEIs, argued that where pre-prints had been produced by a former member of staff the HEI should be allowed to submit the final version of the output to REF 2021 where it is not substantially different from the pre-print; this would recognise the HEI's investment, solve issues where pre-prints may be taken down once final versions are published and remove the burden of storing pre-prints of former staff. There was some concern, particularly from the mathematics community, regarding the proposal to limit the eligibility of pre-published outputs to those from 2013, given the long peer-review timescales in the discipline. Other comments called for greater clarity in terminology relating to this area.
52. Other comments included discussion of the need to ensure that individuals with zero outputs are not identifiable as this may breach the confidentiality of disclosures about staff circumstances. A small number of comments expressed concerns about the intention to provide panels with information on the distribution of outputs because: this could create a perceived requirement to base output selection on representativeness rather than quality; it is incongruous with the flexibility of decoupling; and there is no guidance on how panels would assess this. Small numbers of respondents: voiced general support for IDR measures, with requests for greater clarity; called for more detail on the procurement and use of citation data; raised concerns about the difficulty of determining publication date for practice-based outputs; called for a ranked list of reserve outputs, rather than attaching a specific reserve to each submitted output; and called for clarity on the definition of 'significant material in common' for outputs.

Question 9: 'Do you have any comments on the clarity and usefulness of the glossary of output types and collection formats?

53. For Question 9, 157 respondents commented on the clarity and usefulness of the glossary of output types and collection formats that was included at Annex K. Nearly 60 per cent of comments came from HEIs and a further one-quarter came from subject associations or learned societies, which tended to have specific concerns relating to their disciplines. Overall, just over 45 per cent of comments were purely positive and confirmed that the glossary is helpful and useful.
54. Around one-third of comments related to discrepancies between Annex K in the Draft guidance on submissions and Annex C in the Draft panel criteria and working methods. Some suggested combining the two output glossaries to avoid confusion, and using cross-referencing.
55. Around one-quarter of those commenting discussed output types they perceived to be missing from the annexes. 'Special issues of journals' was the most common output type that respondents thought was missing. A small number of comments recommended expansion of the digital output section. A small number of commenters raised queries on which output type outlined in the glossary particular outputs were best classified under.
56. A small number of respondents expressed concerns over the output type 'I – Performance' and potential difficulties in submitting certain output types such as datasets and computer games. A small number requested further clarity on file size limits for uploads of outputs, output eligibility, multiple weighting of outputs attributable to more than one output type, and whether there is anything specifically considered to be an ineligible output type. A very small number welcomed the addition of 'Translation' as an output type.

Question 10: ‘Do you agree with the proposal to make ineligible the outputs of former staff who have been made redundant (except where the staff member has taken voluntary redundancy)?’

Response	Count	Percentage
Yes	130	53%
No	74	30%
Other	42	17%
Grand Total	246	100%

Table 12: Responses to Question 10

57. On Question 10, 246 respondents commented on the proposal to make ineligible the outputs of former staff who have been made redundant. 53 per cent agreed with the rationale and intention of the proposal and 30 per cent disagreed. 17 per cent did not indicate straightforward agreement or disagreement, although many of these respondents tended to agree with the principle while raising significant concerns and issues relating to its implementation. Additional comment was provided by 55 per cent of those who answered this question. A greater proportion of respondents who did not agree made comments than those who did agree.
58. The most frequently cited reasons for supporting the proposal was that it would help address issues of ‘game-playing’ in the REF exercise and would avoid the risk of negative incentives related to making redundancies (thus offering some protection to staff). Under ten per cent of all comments on Question 10 noted these benefits. A small number of comments advocated extending the rule of output ineligibility to other groups, particularly those made voluntarily redundant or who have had a case for unfair dismissal upheld.
59. Over 20 per cent of comments on Question 10 raised the issue of the proposal’s effect on staff employed on fixed-term contracts of two years or longer since these individuals are formally made redundant at the end of those contracts. Concerns were raised that the proposal could create negative consequences around the hiring of staff, such as early-career fellows, on fixed-term contracts if their outputs were not eligible for REF submission. Many comments advocated including in the REF the outputs from staff employed on fixed-term contracts. Around 13 per cent of those commenting noted the benefits for individual staff, including those made redundant, of having outputs published when employed by former institutions visible in the REF, or raised concerns about the effects on staff of not having outputs included in the exercise. Just under ten per cent of those commenting made suggestions for refining the proposal, such as by seeking consent for inclusion on a case-by-case basis.
60. Around 15 per cent of those who commented on the proposal raised concerns about it requiring the sharing of sensitive information regarding staff employment and departure with those selecting outputs for REF submission.

61. Just over ten per cent sought general clarification of the proposal, including the definition of redundancy. A similar number noted the complexities surrounding redundancy, including the extent to which voluntary redundancy is fully distinguishable from other types. A similar number again also sought clarity on the eligibility of outputs where staff have left an institution for other reasons, and on how audit or the evidencing of the reasons for a staff member leaving an institution would operate in practice. A small number raised concerns about the ability of HEIs to verify or evidence information concerning redundancy in audit, and about the burden of audit.
62. A small number raised issues surrounding the general burden and the complexity that this proposal would introduce, as well as the fact that external factors such as changes in student numbers can dictate redundancies, meaning that redundancy does not always reflect research investment decisions.

Question 11: 'Do you agree with the proposed intention to permit the submission of co authored outputs only once in the same submission?'

Response	Count	Percentage
Strongly agree	142	57%
Agree	19	8%
Neither agree nor disagree	70	28%
Disagree	13	5%
Strongly disagree	3	1%
Grand Total	247	100%

Table 13: Responses to Question 11

63. There were 247 responses to Question 11, with 65 per cent of respondents agreeing or broadly agreeing with the proposal to permit submission of co-authored outputs only once in the same submission, while 28 per cent broadly disagreed and five per cent neither agreed nor disagreed. Individuals, departments and representative bodies were more likely to agree with the proposal than average. Subject associations and research users were divided in their responses but were generally more likely to disagree with the proposal than average. HEI responses almost exactly reflected the average, although there were some variations. Strongest support came from non-research-intensive HEIs and small and specialist institution across Main Panels A to C. Russell Group HEIs and most arts-focused small and specialist institutions were less likely to support the proposal. This disciplinary split was not reflected in responses from subject associations and learned societies where views were mixed across disciplines.
64. Further comments were made by 160 respondents. Those agreeing with the proposal did so because: it supports the principle of decoupling and prevents double counting of research; it enables HEIs to demonstrate the breadth of their research; the ability to split double-weighted outputs across two individuals is sufficient; its simplicity will reduce burden; it will limit game-playing that involves adding co-authors who have not made substantial contributions to the output; and allowing submission of outputs more than once would be problematic in disciplines where high numbers of co-authors are the norm.

65. Those disagreeing with the proposal did so because: it does not support collaborative working and IDR; it is not equitable to treat work produced within a UOA differently from that produced between UOAs or HEIs that could be submitted more than once; it could disadvantage ECRs and other protected groups as it may disincentivise senior staff from co-authoring; and it could distort research undertaken if researchers are not encouraged to collaborate within their UOAs.
66. Some commenters were uncertain about the proposal or thought there should be exceptions to the policy. A few argued that there are sufficient disciplinary differences to merit variation across the panels, particularly for panels covering a broad range of disciplines. Others advocated the idea that it should be possible to submit an output more than once in exceptional circumstances, although examples of potential exceptional circumstances were not often specified. Some suggested that if submission more than once was allowed it could be limited to a certain number or certain proportion of outputs. It was also suggested that an exception to the policy could be made for the outputs of ECRs. Further suggestions included: adapting the guidance on double weighting to include co-authorship even where the output was not eligible for double weighting; considering triple weighting for outputs with three authors; and counting the output once at UOA level (in other words, contributing one to the output requirement) but also against the requirements of two staff members (which was considered to be of value where the output is the sole output of two staff members).

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

Question 12a: ‘How feasible do you consider to be the approach for capturing information on the balance of research activity of different costs within submitting units in UOA 4?’

Question 12b: ‘Are the examples of high cost and other research activity sufficiently clear to guide classification?’

67. There were 131 responses to Question 12a and Question 12b. Responses were mixed, with a range of views provided on the principle of capturing this information, the potential consequences and feasibility of the proposed approach, and the clarity of the guidance. Nearly one-third of commenters questioned the rationale for introducing the proposals, particularly for UOA 4 alone as there are many other UOAs with varying cost levels.
68. While a few respondents outlined their support for seeking to capture costs in some way for this UOA, a substantial minority set out clear reservations and concerns about the intention to capture research cost information through submitted outputs, including key bodies within UOA 4’s subject community. Some of these respondents suggested alternatives, such as using the environment statement or basing activity cost on staff. As well as opposition to the principle of using the REF to capture information on funding, there were concerns that: the proposal might lead to an alignment of cost and quality in the REF exercise; output portability means cost levels will not always reflect investment; that the approach would benefit certain types of HEI and research while devaluing others; that costs cannot be accurately captured by outputs; that most research within UOA 4 is likely to involve mixed costs; and that the proposed approach did not measure productive use of equipment.

69. While a few respondents outlined their support for seeking to capture costs in some way for this UOA, a substantial minority set out clear reservations and concerns about the intention to capture research cost information through submitted outputs, including key bodies within UOA 4's subject community. Some of these respondents suggested alternatives, such as using the environment statement or basing activity cost on staff. As well as opposition to the principle of using the REF to capture information on funding, there were concerns that: the proposal might lead to an alignment of cost and quality in the REF exercise; output portability means cost levels will not always reflect investment; that the approach would benefit certain types of HEI and research while devaluing others; that costs cannot be accurately captured by outputs; that most research within UOA 4 is likely to involve mixed costs; and that the proposed approach did not measure productive use of equipment.
70. Around one-third of those commenting indicated that the proposals seemed broadly feasible. Many of these found the examples clear and provided little further feedback. Some of these responses came from subject bodies or HEIs without a direct interest in, or unlikely to make a submission in, UOA 4. Many of those who felt the approach was feasible, however, also raised issues and concerns, particularly in relation to the potential consequences of introducing the proposal. A number of respondents declined to comment on feasibility until the pilot was complete.
71. A range of specific issues were raised with respect to the examples and guidance, with several suggestions made for clarification or additions. A significant minority expressed concerns about the potential burden on HEIs of introducing the approach for REF 2021.

Part 3, Section 3: Impact

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

Response	Count	Percentage
Strongly agree	34	14%
Agree	150	61%
Neither agree nor disagree	38	16%
Disagree	19	8%
Strongly disagree	4	2%
Grand Total	245	100%

Table 14: Responses to Question 13

72. There were 245 responses to Question 13. Three-quarters of respondents agreed that the guidance on impact was clear, while just under ten per cent disagreed and 15 per cent neither agreed nor disagreed.
73. Additional comments were provided by 163 respondents. Several of these comments welcomed the clarity of the guidance while also identifying several areas requiring clarification and further guidance.

74. Around 40 per cent of those commenting discussed continued impact case studies. Just over half of the comments called for clarity on the definition of these, particularly on whether they would need to focus on new research and new impact, or new research and/or new impact, as well as what would be considered 'significant overlap'. Respondents were keen to understand how the panels would use the continued impact case study flag and sought reassurance that case studies would be treated equitably, regardless of whether they were new or continued. Others felt the definition of continued impact case studies was restrictive, that it implied a value judgement and that it could prevent accurate analysis of the number of case studies continued from REF 2014. A number of respondents called for consistency across the main panels, suggesting that Main Panel A should align with the other main panels.
75. One-quarter of those commenting discussed underpinning research. Nearly 40 per cent of these commenters requested further clarity on the eligibility of 'bodies of work' as underpinning research for impact case studies, particularly on: how a body of work relates to specific outputs; how a body of work will be judged as of two-star quality; what will be acceptable as a body of work; and the eligibility of bodies of work that, for example, began before 2000 or were carried out at multiple HEIs. More guidance was requested on: what an indirect and non-linear relationship between research and impact looks like; what 'distinct and material contribution' means; and on the eligibility of research by PhD students.
76. Just under 20 per cent of those commenting raised concerns about the number of impact case studies required in submissions. It was felt that the required numbers unfairly advantaged larger units and there was a call to reduce the minimum number of case studies to one for very small units (up to 10 FTE) or to allow HEIs to combine impact submissions for multiple UOAs.
77. Around 40 per cent of those commenting discussed continued impact case studies. Just over half of the comments called for clarity on the definition of these, particularly on whether they would need to focus on new research and new impact, or new research and/or new impact, as well as what would be considered 'significant overlap'. Respondents were keen to understand how the panels would use the continued impact case study flag and sought reassurance that case studies would be treated equitably, regardless of whether they were new or continued. Others felt the definition of continued impact case studies was restrictive, that it implied a value judgement and that it could prevent accurate analysis of the number of case studies continued from REF 2014. A number of respondents called for consistency across the main panels, suggesting that Main Panel A should align with the other main panels.
78. One-quarter of those commenting discussed underpinning research. Nearly 40 per cent of these commenters requested further clarity on the eligibility of 'bodies of work' as underpinning research for impact case studies, particularly on: how a body of work relates to specific outputs; how a body of work will be judged as of two-star quality; what will be acceptable as a body of work; and the eligibility of bodies of work that, for example, began before 2000 or were carried out at multiple HEIs. More guidance was requested on: what an indirect and non-linear relationship between research and impact looks like; what 'distinct and material contribution' means; and on the eligibility of research by PhD students.

79. Just under 20 per cent of those commenting raised concerns about the number of impact case studies required in submissions. It was felt that the required numbers unfairly advantaged larger units and there was a call to reduce the minimum number of case studies to one for very small units (up to 10 FTE) or to allow HEIs to combine impact submissions for multiple UOAs.
80. There were a slightly smaller number of comments on the evidence supporting impact case studies. They largely focused on the RAND report on impact in REF 2014², particularly in terms of the burden on HEIs, the need to make clear what is and what is not mandatory, concern that case studies would undergo comparative quantitative analysis by panels, and some formatting and style issues. Respondents, largely HEIs, also commented on the new requirement to submit evidence upfront and requested clarity on: what needed to be submitted; submission formats; when corroborating sources and testimonials should be used; and whether evidence needs to be submitted for all impacts claimed. It was also noted that the evidence requirements will add to the burden on HEIs and that the extended deadline was not helpful.
81. Small numbers of comments discussed how the additional data for impact case studies should be optional, given concerns that this data favours funded research. Others were concerned that ORCID requirements for impact are inconsistent with requirements for outputs and so should be optional. Further clarity was requested on public engagement and there were calls for more specific guidance on the GDPR in relation to impact.

Part 3, Sections 4 and 5: Environment data and Environment

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

Response	Count	Percentage
Strongly agree	40	17%
Agree	163	68%
Neither agree nor disagree	28	12%
Disagree	7	3%
Strongly disagree	2	1%
Grand Total	240	100%

Table 15: Responses to Question 14

82. There were 240 responses to Question 14. Around 85 per cent agreed that the relevant guidance was clear. Only 4 per cent broadly disagreed and the rest neither agreed nor disagreed.
83. For this question, 85 comments were provided. Just over 80 per cent were from those who agreed the guidance was clear and just over 15 per cent of those commenting explicitly noted that the guidance was clear or that it has been improved since REF 2014. 19 respondents to Question 14 made comments that more directly related to Question 15. These reflected the themes discussed by those commenting directly on Question 15.

2. RAND Europe (2015): Assessing impact submissions for REF 2014: an evaluation.

84. Just over 20 per cent of those commenting on Question 14 discussed research income, though each topic discussed in relation to research income was only mentioned by small numbers of respondents. Some suggested that collaborative or subcontracted research income should be included in the environment data. A very small number expressed concern or requested clarity on the proposal to present research income as an average over five years. Concerns were also raised about the challenges of obtaining and mapping data on research income, as well as about the practice within HEIs of withholding proportions of funding awards and how the approach to this could be detailed in the environment statement. Clarity was requested on how the panels will consider reported data on research income and how research-related deferred capital and revenue will be allocated.
85. One-fifth of those commenting – all of which were HEIs, representative bodies or subject associations – discussed data concerning research doctoral degrees awarded. These comments included concerns over HESA data, around mapping students to UOAs and coverage of the student record, and further individual requests for clarity on specific points.
86. Nearly 12 per cent of those commenting discussed research income-in-kind. They flagged issues surrounding the consistency and accuracy of such data in REF 2014 and requested early provision of mechanisms for providing this data, after consultation both with funders and with HEIs. Some suggested that the REF should include income-in-kind from other external providers such as industry partners. A small number of comments requested further clarity on whether income-in-kind applies to arts and humanities disciplines.
87. A small number of comments, all from HEIs, expressed concerns over the timetable for environment data. A small number of comments also made general points about HESA data and requested further guidance on how it will be used. Clarity was also requested by a small number of commenters, including on collaborative research programmes and audit.

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

Response	Count	Percentage
Strongly agree	32	14%
Agree	167	70%
Neither agree nor disagree	29	12%
Disagree	8	3%
Strongly disagree	1	0%
Grand Total	237	100%

Table 16: Responses to Question 15

88. Question 15 received 237 responses. 84 per cent of respondents broadly agreed that the relevant guidance was clear, while just under 4 per cent broadly disagreed and the rest neither agreed nor disagreed. Further substantive comments were provided by 87 respondents, predominantly HEIs. Around one-quarter of commenters stated that the guidance was welcome and clear.

89. The most commonly discussed topic for Question 15, noted by just over 40 per cent of those commenting, was the institutional-level environment statement. Around one-quarter of these expressed their support for the proposed approach, although a number of concerns and questions were raised. One-quarter of those commenting on this noted that the word limits for the institutional-level environment statement were too low compared to the unit-level submission. Comments suggested raising the word limit, allowing flexibility on the word limit based on institution size and replacing the word limit with a page limit. Others queried whether inclusion of graphics would affect the word limit and whether unit-level statements could be cross-referred to the institutional-level pilot panel. Some felt further clarification was needed on the assessment of the institutional-level environment statement given that the draft guidance noted that it will not be formally scored but can be taken into account in the assessment of unit-level submissions. Some felt this posed an additional burden, although others felt it would enable important additional information to be made available to the panels. A small number of comments requested further detail on the role of the pilot panel, its membership and the process involved in the pilot evaluation.
90. Around 13 per cent of those commenting specifically discussed the exemption from submitting an institutional-level environment statement for small and specialist institutions submitting in one UOA only. Most such comments proposed making submission of REF5a optional. Some suggested that all institutions should be required to submit REF5a, while others felt exemption could be extended to HEIs submitting a small number of UOAs. Clarity was also requested on whether exemption would be automatic or would need to be requested.
91. Nearly 13 per cent of those commenting discussed the unit-level environment template. The increased word limit was noted and often felt to increase burden, although some welcomed of the increase. Some suggested that a page limit would be preferable to a word limit, while others requested additional guidance on what should be included in the unit-level submission. Additional clarity was sought on the people element of the template, particularly around how Category C staff should be captured. There were also calls for more explicit recognition of the contribution of research assistants, and requests for guidance on how visiting professors (who are neither Category A nor C) might be represented.
92. Smaller numbers of comments discussed E&D, generally welcoming an increased focus on this within the environment statement. Some requested clarity on how E&D considerations can be included in environment and how EDAP will support panels in assessing this. Small numbers of respondents were also concerned that if a submitting unit was not a single departmental unit within the submitting HEI, this could lead to less favourable assessment for 'environment', although others welcomed the fact that there is no requirement to directly map a submitted unit onto a single department. The inclusion of the impact element in the environment statement was welcomed but additional guidance on this was requested. A small number of those commenting also noted their appreciation for the input from the Forum for Responsible Research Metrics (FFRRM).

Further comments

Question 16: 'Please provide any further comments on the guidance on submissions.'

93. Many of the issues and comments raised in response to Question 16 were also discussed elsewhere in the consultation responses. Some comments were general, positive reflections on the guidance, noting its clarity and usefulness. Some comments also made suggestions for improving the language and layout of the guidance, including requesting hyperlinks and bookmarks within the document for ease of navigation. Others requested grouping of guidance, for example on OA, all in one place. The themes set out in the following paragraphs were frequently discussed.
94. **Timetabling:** Respondents identified where certain timeframes may be challenging, particularly around codes of practice, and requested early notification on processes relating to audit and the submissions system.
95. **Outputs:** Issues were particularly raised around double-weighting, including the concern that books should not automatically be double-weighted and that the guidance needs to be clearer that double weighting must reflect the time and effort required to produce an output. Respondents also requested further clarity on outputs of former staff – including requests for outputs published post-departure to be eligible (particularly for retired or deceased staff) – and on whether UOAs will be penalised for submitting high proportions of outputs by former staff.
96. **Impact:** Further clarity was requested on bodies of work, underpinning research and data requirements. Concerns were raised about: small units being required to submit two case studies; potential disincentives to hire staff in units close to impact case study thresholds; and evidencing impact on students.
97. **Environment:** Some respondents requested inclusion of research integrity and open research in guidance for the unit-level template, others requested guidance and clarity on how sub-panels will use data analyses, and others still made comments on weightings in the unit-level template. Further guidance and clarity were also requested on the institutional-level environment statement.
98. **Panel-specific comments:** A small number of respondents, often only one or two per topic, made comments specifically related to certain UOAs or main panels.
99. **Codes of practice and E&D:** Those commenting on codes of practice felt the burden of these will fall disproportionately on less research-intensive HEIs. There was also concern that the approval requirements for codes of practice could be drawn into wider negotiations between HEIs and staff groups. There was general welcoming of the reduction in output requirements and the process of decoupling staff and outputs as measures to promote E&D. Those commenting also expressed support more generally for an increased focus on E&D in REF 2021.
100. **OA:** Respondents particularly commented on the tolerance band for non-OA-compliant outputs. Some comments also noted that OA policies for the REF have increased the burden on HEIs, particularly for small institutions. Generally, respondents were supportive of OA, although there was some concern that there was a push for HEIs to move beyond the policy requirements.

101. **Data requirements:** Respondents expressed concern over the use of HESA data and potential consequences of this, particularly in terms of over-reliance on HESA data, burden on HEIs in using an increased number of data fields, and in relation to identifying Category A eligible staff. Those commenting also requested the release of requirements for data as soon as possible.
102. **Small and specialist institutions:** There was concern that REF 2021 will represent an additional burden for small, specialist institutions.
103. **Annexes:** Some comments focused on the clarity and usefulness of the annexes to the draft guidance on submissions. They included suggestions for rewording and for additional clarity, as well as for additional information that could be incorporated. Some comments noted that annexes were clear and useful.

Panel criteria and working methods

Part 2: UOA descriptors

Question 1: 'Do the UOA descriptors provide a clear and appropriate description of the disciplines covered by the UOAs?'

104. For Question 1, 62 responses applied across all UOAs; with HEIs providing the majority of these broad comments. Around half of those who responded either did not provide a substantive comment or commented simply to confirm that nothing additional was required in the UOA descriptors. Many of those commenting on the UOA descriptors felt that they were clear.
105. Commenters often suggested additional research areas that should be included within UOA descriptors or suggested where some research areas may be better included in other UOAs. Others requested further detail on the research areas listed within UOAs. In particular, a number of commenters raised queries around the inclusion of criminology and area studies in some UOAs.
106. Commenters often requested further clarity on areas of overlap between particular UOAs and on the disciplinary boundaries of UOAs. Commenters also urged consistency between sub- and main panels.
107. Smaller numbers of commenters requested further clarity on cross-referral processes while some commenters requested clarity on IDR. A small number of commenters also raised concerns about the spread of expertise currently within sub-panels for assessing the range of research within their remit. Relatedly, a small number requested further information on panel recruitment for the assessment phase of REF 2021.

Part 3, Section 1: Submissions

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

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

Question 2c: 'Please comment on where further clarification is required, where refinements could be made, whether there are areas where more consistency across panels could be achieved, and whether there are differences between the disciplines that justify further differentiation between the main panel criteria.'

Response	Count	Percentage
Strongly agree	34	14%
Agree	169	68%
Neither agree nor disagree	29	12%
Disagree	9	4%
Strongly disagree	6	2%
Grand Total	247	100%

Table 17: Responses to Question 2a

Response	Count	Percentage
Strongly agree	34	14%
Agree	171	70%
Neither agree nor disagree	23	9%
Disagree	13	5%
Strongly disagree	2	1%
Grand Total	243	100%

Table 18: Responses to Question 2b

108. Question 2a received 247 responses. Over 80 per cent broadly agreed that the criteria in 'Part 3, Section 1: Submissions' were appropriate, while six per cent broadly disagreed and the rest neither agreed nor disagreed. Question 2b received 243 responses, with just under 85 per cent broadly agreeing that the criteria were clear, just over six per cent disagreeing and the rest neither agreeing nor disagreeing.
109. There were 102 substantive comments across Questions 2a, 2b and 2c. IDR was the most commonly discussed topic, raised by just over one-third of those commenting. In particular, respondents requested additional detail on the cross-referral process and the use of the interdisciplinary flag. A smaller number requested elaboration on the definition of IDR as well as consistency between all REF documents on this.
110. Around one-quarter of those commenting discussed pedagogic research. The vast majority of these comments requested increased consistency across the panels, particularly encouraging Main Panel A to align with the other main panels. A small number sought further clarification on the boundaries of pedagogical research.
111. Around 13 per cent of those commenting discussed multiple submissions. They generally supported increased consistency between main panels with respect to allowing multiple submissions to UOAs.

112. UOA-specific and discipline-specific issues were raised by smaller numbers of commenters. Particularly notable were discussions around criminology, which included: concern regarding the number of advisors with specific responsibility for criminology, support for a criminology flag, and requests of further details on criminology submissions. Comments on UOA 12 (Engineering), UOA 26 (Modern Languages and Linguistics) and UOA 3 (Allied Health Professions, Dentistry, Nursing and Pharmacy) were also notable, though made by fewer than ten respondents in each case. These comments requested sub-profiles for impact case studies, raised concerns that multiple submissions were not allowed, and also raised concerns about the visibility of specific subject areas.

Part 3, Section 2: Outputs

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

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

Response	Count	Percentage
Strongly agree	31	13%
Agree	167	68%
Neither agree nor disagree	29	12%
Disagree	14	6%
Strongly disagree	4	2%
Grand Total	245	100%

Table 19: Responses to Question 3a

Response	Count	Percentage
Strongly agree	27	11%
Agree	166	67%
Neither agree nor disagree	27	11%
Disagree	24	10%
Strongly disagree	2	1%
Grand Total	246	100%

Table 20: Responses to Question 3b

113. There were 245 responses to Question 3a, with just over 80 per cent broadly agreeing that the criteria in 'Part 3, Section 2: Outputs' were appropriate, approximately eight per cent broadly disagreeing and the rest neither agreeing nor disagreeing. There were 246 responses to Question 3b, with 78 per cent broadly agreeing that the criteria were clear and just over ten per cent broadly disagreeing.

114. Those commenting on Question 3a and Question 3b discussed various issues. Citation data was most frequently discussed, with most of these comments coming from HEIs and subject associations. Commenters welcomed the fact that citation data will not be used in Main Panel D and will be used to a limited extent in Main Panel C. There were calls for greater transparency and calls for clarity on the use of citation data, citation data training for panels, and on the data provider. There was broad consensus that some E&D issues exist with respect to use of citation data, including: potential disadvantages for academics in niche research areas or with small networks, and for recent publications; concerns that citation data is not appropriate in the arts and humanities; and concerns that use of citation data could lead to a hierarchy between disciplines.
115. Co-authorship was also commonly discussed, primarily by HEIs and subject associations. A number of respondents suggested that Main Panels A and B align on approaches to co-authorship, though there was no consensus on what this alignment should look like. Comments also included calls for further clarity on: scoring outputs; co-authorship statements; the definition of author contribution; how co-authorship will relate to the principle of decoupling staff and outputs; and, particularly, processes within Main Panels C and D. Some of those commenting raised E&D concerns regarding how contribution acknowledgements are often recorded. A small number expressly supported the ability to submit a co-authored output more than once in Main Panel D.
116. IDR was also discussed fairly frequently. These comments often expressed concern and highlighted a need for greater clarity regarding processes for cross-referral, particularly where the distinction between IDR and cross-referral is blurred. Others sought greater clarity on the use of the IDR flag.
117. There were widespread, strongly expressed calls for further information and clarity on the submission, presentation and assessment of practice-based research outputs in Main Panel D. In particular, those commenting expressed concern with respect to the removal of the term 'portfolio' and requested clarity on 'the integrated presentation of material'. Clarity was also particularly sought on bodies of work, double weighting and practices specific to individual main panels.
118. A small number of commenters recommended changes to terminology and to scoring criteria. A small number of respondents also commented on pre-prints and their eligibility for submission to REF 2021. Others welcomed the attention on reproducibility in the 'Draft panel criteria and working methods', but also noted the need for further clarity on this. A small number of comments related to Annex C, which detailed output types. Most found the annex helpful, although further clarity was requested on some definitions and greater alignment with the 'Guidance on submissions' was also requested.

Question 3c: 'Please comment on the proposed criteria for double weighting outputs in Main Panels C and D and on whether requests to double weight books should automatically be accepted, whether 'Main Panel D – outputs types and submission guidance' is helpful and clear, where further clarification is required, where refinements could be made, whether there are areas where more consistency across panels could be achieved, and whether there are differences between the disciplines that justify further differentiation between the main panel criteria.'

119. There were 122 comments provided on the double weighting of outputs in Main Panels C and D. Comments came from all categories of respondents. Around half of those commenting opposed automatic double weighting of books, while just over 20 per cent supported it; the rest neither clearly supported nor clearly opposed it. Those against automatic double weighting felt it would prioritise certain output types (particularly among creative disciplines), would change publication behaviours and would not account for the degree of variance of research input into books. They also felt double weighting should relate to the depth and scope of research rather than to an output's size. Those in favour of automatic double weighting argued that it would reduce administrative burden and encourage submission of outputs of this nature. Other considerations included the observation that automatic double weighting would require a much clearer definition of books.
120. Further clarity on the criteria for double weighting was requested by just over one-third of those commenting. In particular, clarity was sought on: requirements for and the content of supporting statements for double weighting; examples where double weighting will not be granted; reserve outputs; the processes for double weighting and reserve outputs with multiple authors; and the eligibility for double weighting of edited books and collections. Some comments from HEIs, subject associations and representative bodies noted that there should be greater consistency on double weighting between Main Panels C and D.

Part 3, Section 3: Impact

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

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

Question 4c: 'Please comment on where further clarification is required, where refinements could be made, whether there are areas where more consistency across panels could be achieved, and whether there are differences between the disciplines that justify further differentiation between the main panel criteria.'

Response	Count	Percentage
Strongly agree	26	11%
Agree	166	68%
Neither agree nor disagree	37	15%
Disagree	11	4%
Strongly disagree	5	2%
Grand Total	245	100%

Table 21: Responses to Question 4a

Response	Count	Percentage
Strongly agree	25	10%
Agree	153	62%
Neither agree nor disagree	45	18%
Disagree	21	9%
Strongly disagree	3	1%
Grand Total	247	100%

Table 22: Responses to Question 4b

121. There were 245 responses to Question 4a, with just under 80 per cent broadly agreeing that the criteria in 'Part 3, Section 3: Impact' were appropriate and just under seven per cent disagreeing. There were 247 responses to Question 4b, with just over 70 per cent broadly agreeing that the criteria were clear, around ten per cent broadly disagreeing and the rest neither agreeing nor disagreeing.
122. Across Questions 4a, 4b and 4c, 161 comments were provided. The majority reflected on inconsistencies between the main panels. In particular, respondents noted the differences between Main Panel A and the other main panels with regard to continued impact case studies and recommended alignment across main panels. Commenters also noted variations in definitions and in the use of testimonials between main panels, again requesting greater consistency and alignment.
123. Other comments related to specific main panels. With regard to Main Panel A, these raised concerns in terms of whether pedagogical impact would be assessed in this panel since the draft panel criteria could potentially discourage submissions of this type to Main Panel A. There was also concern that the differentiation between testimonials from individuals and testimonials from individuals representing an organisation might exclude individual patients' voices as evidence of impact. Clarity was requested on the definition of continued impact, on indicators of research quality (particularly for non-standard outputs) and on how impact testimonials will be used for Main Panel A. These requests for clarity were also noted by those commenting on Main Panel B. With regard to Main Panel C, those commenting made suggestions around 'public scrutiny'. Some commenters suggested that Main Panel D may be disadvantaged by what they perceived as a preference for quantitative data over testimonials for impact, and further detail was requested in relation to area studies and impact beyond the UK.
124. A number of requests were made for further clarity on 'Part 3, Section 3: Impact'. In particular on: the relationship between underpinning research and impact; the difference between underpinning research and a body of research, where underpinning research should have been undertaken; the definition of 'new' and 'continued' case studies; how impact from public engagement will be assessed; how impact on pedagogy will be assessed; how the two-star quality threshold needs to be evidenced; and on the definitions of reach and significance. Reassurance was sought on how the significance of policy impact in Northern Ireland will be measured and assessed in light of the absence of a devolved government.

Part 3, Section 4: Environment

Question 5a: 'Overall, the criteria are appropriate in 'Part 3, Section 4: Environment'.'

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

Question 5c: 'Please comment on whether the difference in section weightings across main panels is sufficiently justified by disciplinary difference, whether the list of quantitative indicators provided is clear and helpful, where further clarification is required, where refinements could be made, whether there are areas where more consistency across panels could be achieved, and whether there are differences between the disciplines that justify further differentiation between the main panel criteria.'

Response	Count	Percentage
Strongly agree	31	13%
Agree	172	70%
Neither agree nor disagree	30	12%
Disagree	10	4%
Strongly disagree	1	0%
Grand Total	244	100%

Table 23: Responses to Question 5a

Response	Count	Percentage
Strongly agree	30	12%
Agree	171	71%
Neither agree nor disagree	31	13%
Disagree	10	4%
Strongly disagree	0	0%
Grand Total	242	100%

Table 24: Responses to Question 5b

125. There were 244 responses to Question 5a, with 83 per cent broadly agreeing that the criteria in 'Part 3, Section 4: Environment' were appropriate, while around five per cent broadly disagreed. Of the 242 responses to Question 5b, 83 per cent broadly agreed that the criteria were clear and around four per cent broadly disagreed. The remaining respondents to both questions neither agreed nor disagreed.
126. Additional comments across Questions 5a, 5b and 5c were made by 144 respondents. Only 11 of these came from respondents who broadly disagreed that the criteria were appropriate and clear.

127. Over two-thirds of those commenting discussed section weightings for the environment template. The vast majority agreed with the proposed weightings. Around 20 per cent argued that the different weightings for Main Panel D should apply to other panels too, particularly Main Panel C. Some commenters raised issues with differential weightings between main panels while others called for clarity on the rationales for these differential weightings.
128. Just over one-third of those commenting discussed the institutional-level environment statement. Most of these comments requested additional guidance and clarification on how the templates will be used during the assessment, including how the institutional-level statement relates to the unit-level template. Others were unsure how much effort institutions were expected to expend on the institutional-level environment template, given that it is a pilot exercise. Some panel-specific comments were raised including a suggestion that the template for Main Panel A should include a section to provide evidence on a culture of care in units using animals in research.
129. Slightly more than one-quarter of those commenting referred to the use of indicators within the environment template. There was some concern that quantitative indicators are more relevant for Main Panels A and B and may favour larger HEIs, and that allowing submitting units to choose which indicators to use might make consistent use of indicators problematic for sub-panels. Some felt the indicators were not useful or were ineffective while others suggested possible additional indicators.
130. Around 20 per cent of those commenting discussed the representation of the postgraduate community in the environment statement. Clarity was requested on the definition of professional doctorates and 'formal collaborative programmes for research training', and on how data on suspended studies and students with supervisors across UOAs will be considered. Some queried whether allowances will be made for smaller institutions which do not have large numbers of research students while a very small number of commenters suggested that some HEIs may have a higher level of withdrawal from study of postgraduate research students due to reasons not necessarily connected with the environment of any given unit. Other suggestions included recognition of support for postgraduate students beyond training and supervision, and that clinical-training scholars and residents in veterinary science should be considered equivalent to doctoral students.
131. Smaller numbers of comments related to non-HESA income, generally to request further guidance on data collection, verification, presentation and use. OA was also discussed by a small number of respondents. These comments included mixed views on the appropriateness of having additional definitions of OA for Main Panel D; requests for additional guidance on how institutions can go 'above and beyond' OA requirements; and suggestions that Main Panel D's invitation to provide reference to contribution to OA debates and processes should be extended across all panels. There were a similar number of comments on E&D. These generally suggested additions to the templates to better capture E&D considerations or requests for clarity on terminology. A small number of comments focused on the differences between UOAs. They tended to highlight issues that may arise (often in terms of word-count limitations) due to disciplinary differences between UOAs. A small number of queries were also raised around how staffing strategy and impact should be captured in the environment template. Very small numbers of comments were received on the format and structure of the guidance and criteria.

Partv 4: Panel procedures

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

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

Question 6c: 'Please comment on where further clarification is required or where refinements could be made.'

Response	Count	Percentage
Strongly agree	45	19%
Agree	164	70%
Neither agree nor disagree	21	9%
Disagree	3	1%
Strongly disagree	1	0%
Grand Total	234	100%

Table 25: Responses to Question 6a

Response	Count	Percentage
Strongly agree	44	19%
Agree	160	69%
Neither agree nor disagree	22	10%
Disagree	4	2%
Strongly disagree	1	0%
Grand Total	231	100%

Table 26: Responses to Question 6b

132. There were 236 responses to Question 6a. 89 per cent broadly agreed that the criteria in 'Part 4: Panel procedures' were appropriate, only one per cent broadly disagreed and the rest neither agreed nor disagreed. There were 231 responses to Question 6b. 88 per cent broadly agreed that the criteria were clear and just over two per cent broadly disagreed. Again, the rest neither agreed nor disagreed with the statement.
133. Across Questions 6a, 6b and 6c, 39 respondents provided additional comments. The overwhelming majority of comments fell into one of three categories: cross-referral, conflicts of interest and panel appointments.
134. Those commenting on cross-referral noted that using it only in exceptional circumstances does not give the sector confidence that IDR will be appropriately assessed. They also requested further clarity on the REF Director's role in cross-referral. Some also noted that the cross-referral sub-panel should use the same criteria for assessment as the sub-panel to which the output was originally submitted.

135. Comments on conflicts of interest were made by small numbers of respondents and included: recommendations that the 'Panel criteria and working methods' should reference the seven principles of public life and consider escalating conflicts of interest beyond the panel chair where appropriate; that it would be helpful to know which panel and sub-panel members had declared conflicts of interest relevant to each HEI; that a conflict of interest may arise from employment with business, particularly with respect to impact, as well as from employment with HEIs.
136. Those commenting requested additional clarity on the appointment procedures for sub-panel members and, on the whole, of panel observers.

Part 5: Panel working methods

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

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

Question 7c: 'Please comment on where further clarification is required or where refinements could be made.'

Response	Count	Percentage
Strongly agree	35	15%
Agree	168	70%
Neither agree nor disagree	30	13%
Disagree	7	3%
Strongly disagree	0	0%
Grand Total	240	100%

Table 27: Responses to Question 7a

Response	Count	Percentage
Strongly agree	34	14%
Agree	167	69%
Neither agree nor disagree	28	12%
Disagree	12	5%
Strongly disagree	1	0%
Grand Total	242	100%

Table 28: Responses to Question 7b

137. There were 240 responses to Question 7a. 85 per cent broadly agreed that the criteria in 'Part 5: Panel working methods' were appropriate and three per cent broadly disagreed. There were 242 responses to Question 7b, with 83 per cent broadly agreeing that the criteria were appropriate while just over five per cent broadly disagreed. Across Questions 7a, 7b and 7c, 122 respondents made further comments.

138. Just under 20 per cent of those commenting discussed cross-referral. Some noted that the processes for IDR and cross-referral are similar. Other comments on this topic included: that HEIs may be better placed than the REF Director to decide whether outputs require cross-referral; that there should be a mechanism to cross-refer groups of individuals; suggested improvements to advice and/or scoring through cross-referral; and that cross-referred outputs might be disadvantaged if panels do not assess all REF components in the same order. Others suggested that cross-referrals should not be exceptional and requested clarity on the proportion of outputs within a submission that can be cross-referred. Small numbers felt cross-referrals should include guidance on double weighting where appropriate and that impact case studies should be cross-referred where necessary.
139. Around 20 per cent of respondents commented on calibration, particularly in order to request further details about calibration exercises and how consistency across panels will be ensured. Some expressed concern that outputs should receive the same grade when submitted in different UOAs and multiple times within one UOA. Small numbers also suggested terminology changes around calibration.
140. Nearly 11 per cent of those commenting discussed the processes for assessing interdisciplinary outputs. A significant number of these requested further clarity on the process for assessing such outputs, while a small number suggested that the proposals for IDR should be tested both pre- and post-REF 2021. Small numbers suggested that HEIs may not be very good at determining whether an output should be flagged as interdisciplinary, though these commenters did not indicate why HEIs may find this difficult. A number felt the definition of IDR was not appropriate and suggested ways to improve it. A small number also queried the expertise of interdisciplinary panel members.
141. A similar number made comments relating to panel assessors. Most of these respondents asked for the number of assessors for outputs to be specified, with many suggesting that each output should have at least two sub-panel assessors. Some also requested an increase in the number of assessors for impact case studies to three. Small numbers queried the role of research users, made suggestions around training for sub-panel members, and suggested that environment information be used to contextualise impact assessment.
142. Smaller numbers of commenters discussed panel membership, with most of these comments being individual and specific. Broadly, they included: concerns in relation to the later appointment of sub-panel members; comments on representation and expertise on particular sub-panels; calls to ensure sufficient interdisciplinary expertise on sub-panels; endorsement of the inclusion of research users on sub-panels; and a suggestion that cross-panel assessors could work across multiple UOAs where research overlaps.
143. Small numbers of comments discussed the following topics: the consequences of removing ineligible staff from submissions; additional information for impact case studies; the frequency of main panel meetings; environment data; OA tolerance bands; conflicts of interest; the management of assessment, and how E&D will be embedded in panel working methods.

Overall panel criteria and working methods

Question 8a: 'Overall, the 'Panel criteria and working methods' achieve an appropriate balance between consistency and allowing for discipline-based differences between the panels.'

Question 8b: 'Please comment on the balance between consistency and allowing for discipline-based differences between the main panels.'

Response	Count	Percentage
Strongly agree	19	8%
Agree	173	70%
Neither agree nor disagree	37	15%
Disagree	15	6%
Strongly disagree	2	1%
Grand Total	246	100%

Table 29: Responses to Question 8a

144. A total of 246 responses were received for Question 8a. Nearly 80 per cent broadly agreed that the panel criteria and working methods achieved an appropriate balance between consistency and discipline-based differences, while approximately seven per cent disagreed.
145. Around one-third of respondents provided additional comments. Many comments provided across Question 8a and Question 8b tended not to be detailed and tended to refer to other questions within the consultation, so have been captured in analysis elsewhere in this document. Generally, the comments provided mixed views on the overall balance between consistency and discipline-based differences within the 'Draft panel criteria and working methods'. Some commenters felt the current balance was appropriate while others recommended greater levels of consistency between the main panels, particularly on impact, co-authorship, cross-referrals, and weighting of elements within the environment statement.
146. Those commenting particularly noted variation between Main Panel A and the other main panels, especially with regard to guidance on impact, co-authorship, environment, pedagogic research, citation data, quantitative indicators and output-quality characteristics. Respondents generally felt that disciplinary difference did not deliver a strong enough rationale for these variations.
147. There were a small number of comments on the presentation of the 'Draft panel criteria and working methods'. Some noted overlap between the document and the 'Draft guidance on submissions' and some suggested merging the two documents. There were specific requests to consolidate guidance on IDR and OA into single documents as the guidance on these is currently spread across the two documents. Some minor inconsistencies and overlaps between the two documents were highlighted and some technical suggestions were made on improving the presentation of Annexes A and D.
148. Several respondents provided feedback on panel composition. It was particularly noted that the representation of Welsh, Irish, black and female academics as well as academics from post-1992 HEIs could be improved. There was also a request for clarity on how unconscious bias among panel members will be mitigated.



Cyngor Cyllido Addysg
Uwch Cymru
Higher Education Funding
Council for Wales

hefcw



Nicholson House
Lime Kiln Close
Stoke Gifford
Bristol BS34 8SR

tel 0117 931 7392
e-mail info@ref.ac.uk
www.ref.ac.uk
