King's College London REF Code of Practice

Contents

Addendum to the Code of Practice – August 2020

- In March 2020, the funding bodies put the REF exercise on hold in response to the effects of COVID-19. A revised submission deadline of midday 31 March 2021 was announced in June 2020.
- Changes to the timetable outlined in the Code of Practice were necessary in order to meet the revised REF deadline. These are outlined below (new dates in red):

Research Independence process

September 2019 [Staff appointed after 1 September 2019 will be contacted in January 2020] [Staff appointed after 1 February will be contacted in July 2020]	Staff on research-only contracts (with an end date of 31July 2020 or later) identified through HR records. Identified staff contacted by central REF team and asked to complete an online web-form to determine whether or not they meet the criteria of research independence.
October 2019 [February 2020 for staff appointed after 1 September 2019] [August 2020 for staff appointed after 1 February 2020]	Information provided to the UOA Lead for the relevant UOA who makes a recommendation to the Main Panel Lead. The Main Panel Lead chooses to accept or reject the recommendation, based on the information provided and communicates the decision to the REF Oversight Group.
November 2019 [February 2020 for staff appointed after 1 September 2019] [August 2020 for staff appointed after 1 February 2020]	REF Oversight Group ratifies the decision at its termly meeting. Staff are informed of the decision by the UOA lead and are able to appeal according to the process detailed at **section 3.3** below.
31 October 2020	Final date for appeals to be submitted

Selection of outputs

Spring/Summer 2018	- First evaluation phase for outputs from academic staff[1].
Early 2019	- Comments and predicted output scores derived from the review exercise shared with staff members - Where it is identified that a staff member who is eligible for submission does not have an output, they will be informed, provided with the appropriate support and mentoring to improve their research, and set targets to attain within a specific time period.[2].

---

[1] In some UOAs staff on research-only contracts were excluded from the first evaluation phase whilst College waited for further guidance on the definition of "independence"

[2] The output peer-review process will facilitate the identification of staff who need support for the production of REF eligible outputs as part of their ongoing career development.

Spring/Summer 2019	- Second evaluation phase for outputs from academic staff
	- First evaluation phase for outputs from independent research staff and from former staff members
Autumn/Winter 2019	- Simulation of REF submission based on the predicted grades from the evaluation exercise and guidance from Research England.
Early 2020	- Comments and predicted grades derived from the review exercise shared with staff members.
Autumn 2020	- Final evaluation phase for outputs from academic staff
	- Final evaluation phase for outputs from independent research staff and from former staff members
Spring 2020	- Final output selection to be done based on the predicted grades from the evaluation exercise.
	- Comments and predicted grades derived from the review exercise shared with staff members.
	- Staff will receive confirmation of the outputs attributed to them in the submission by April 2020

Timeline for circumstances disclosures

From March 2019	Process for the disclosure of circumstances communicated to all staff, including deadline for submissions and dates for ACRS meetings
June 2019	Online form for circumstances disclosure goes live.
September 2019	First deadline for circumstances to be considered
October 2019	- Meeting of the ACRS and consideration of disclosures
	- Recommendations for UOA reductions to be communicated to UOA Leads
January 2020	Second deadline for circumstances to be considered
February 2020	- Meeting of the ACRS and consideration of disclosures

	- Recommendations for UOA reductions to be communicated to UOA Leads
	-UOA Leads to confirm whether they wish to submit reductions for pre-approval
March 2020	Deadline for submission to Research England
July 2020	- Third deadline for circumstances to be considered.
	- ACRS meeting to consider disclosures.
August 2020	Applicable Circumstances form to re-open
January 2021	Final deadline for circumstances to be considered
February 2021	- Final meeting of the ACRS to consider disclosures
	- UOA Leads to confirm whether they wish to request further reductions at submission
March 2022	All circumstances data will be destroyed.

Executive summary
In order to make a submission to the Research Excellence Framework (REF), each institution is required to submit a Code of Practice outlining the policies and processes which it will follow to identify eligible staff and select outputs for submission.

The Code of Practice has been discussed by the REF Oversight Group, the King's Equality and Diversity Advisory Panel, and College Research Committee at previous meetings. It was circulated to all staff for comment in March 2019, and was approved by Academic Board on 1st May. It will be submitted to Research England by 7 June 2019.

Changes from REF2014
There are a number of key changes from REF2014 in the staff and outputs elements of the submission:

- HEIs will return all staff who hold at least a 0.2FTE contract, with a substantive connection to the university, who have a significant responsibility for research and who are independent researchers

- UOAs will submit an average of 2.5 outputs per FTE of the UOA's submitted staff, comprising a minimum of one output attributed to each staff member and no more than five attributed to any staff member

- HEIs may return the outputs of staff previously employed as eligible

Staff Eligibility
The King's Code of Practice identifies the following staff as eligible for submission:

- All staff holding an "Academic contract that is both teaching and research" of at least 0.2FTE

- Staff holding an "Academic contract that is research only" who hold an independently won, competitively awarded fellowship that is included on the Research England list of independent fellowships

- Staff holding an "Academic contract that is research only" who meet the criteria for research independence

The Code of Practice outlines the process that will be followed to identify eligible research only staff, along with the appeals process for staff who disagree with any decision made about their eligibility for submission. It also outlines the process for establishing that staff on 0.2FTE – 0.29 FTE contracts have a substantive connection to the institution.

Output selection
The Code of Practice describes the process for selecting which outputs will be included in the REF submission. The UOA Lead (with the Main Panel Lead) will make the final selection of outputs, aiming to optimise the quality profile. UOAs will be required to submit an average of 2.5 outputs per submitted FTE, including at least one output for each member of staff, up to a maximum of five outputs attributed to any member of staff. Where the quality profile is enhanced, outputs from former staff may be included. The results from the internal output evaluation exercises will be used to inform the output selection.

Applicable circumstances
The Code of Practice outlines the process which will enable staff to disclose, in confidence, relevant circumstances that have impacted their capacity to contribute to the pool of eligible outputs. The outcomes may mean:

- that an individual has had such exceptional circumstances that they can be submitted without the minimum of one output, without penalty; and/or
- that there is a case for submitting a request for a UOA output reduction

In keeping with REF guidance, the process will be one of voluntary disclosure, meaning that King's will not identify staff with particular circumstances through HR records.

Anonymised disclosed circumstances will be considered by the Applicable Circumstances Review Sub-panel, which will apply tariffs to ECR/Secondment/Family Leave circumstances, and make judgements about appropriate reductions for circumstances equivalent to absence. UOA Leads will be informed about the total output reduction that could be applied to the UOA, based on the cumulative effect of the circumstances disclosed, and which staff can be submitted with zero outputs. They will not receive details of disclosed circumstances. The UOA Leads will confirm by the end of February 2020 whether or not they wish to request an output reduction. Output reduction requests will be submitted to Research England in March 2020.

Equality Impact Assessment

Equality impact assessments (EIAs) will be carried out at regular intervals to check the impact of the policies outlined in the Code of Practice. An initial EIA was carried out in early March 2019, based on the output evaluation exercise which was undertaken in 2018. The data showed that staff with an "Academic contract that is both teaching and research" were more likely to have had outputs reviewed than staff on other types of contracts, and also showed no statistically significant evidence of bias. An EIA will be done after each iteration of the independent research process and on the full submission in November 2020.

Timescale

The Code of Practice will be made available to all staff via the intranet, along with guidance documents, flowcharts and links to online forms, from 7 June 2019. If Research England approve the Code of Practice in August 2019 the processes outlined in the document will take effect in September 2019, otherwise they will be delayed until December 2019.

The REF submission will be made on 27 November 2020.

Part 1: Introduction

Every institution making a submission to the Research Excellence Framework (REF) is required to develop, document and apply a code of practice on selecting staff and outputs to include in their REF submissions, and on making the submission, the Head of Institution is required to confirm adherence to the code. This document constitutes the formal Code of Practice on the selection of staff and outputs for King's College London's REF2021 submission.

The Code of Practice was drafted by members of the Research Management and Innovation Directorate (RMID) with input from the King's Equality and Diversity Advisory Panel (EDAP) as well as the College's wider Diversity and Inclusion department. It was discussed by the REF Oversight Group and College Research Committee on three occasions and circulated to all staff within the College for comment, in advance of its formal approval in principle by Academic Board on 1 May 2019.

1.1 Relation to broader institutional policies and strategies that promote and support E&D

King's College London is committed to equality of opportunity, and the College's Equality and Inclusion statement (most recent version approved January 2018) states:

King's College London is committed to creating an inclusive environment that promotes equality of opportunity for everyone in its community. King's values the diversity of its staff and student body, and recognises that this is both a strength and a defining feature of King's as a London university in a global context.

The following principles apply in respect of the College's commitment to equality and diversity:

- To provide and advance equality of opportunity in all areas of its work and activity

- To recognise and develop the diversity of skills and talent within its current and potential community

- To ensure that all College members and prospective members are treated solely on the basis of their merits, abilities and potential without receiving any unjustified discrimination or unfavourable treatment because of a protected characteristic

- To provide and promote a positive working, learning, and social environment which is free from prejudice, discrimination and any forms of harassment, bullying or victimisation

- To foster good relations between individuals from different groups and tackle prejudice and promote understanding.

- To create an environment in which differences are not just respected, but also valued and celebrated.

As an employer and a public body, the College must ensure that the procedures and policies in place for the REF do not discriminate unlawfully against individuals because of age, disability, gender identity, marriage and civil partnership, race, religion or belief, sex or sexual orientation, pregnancy or maternity. The College also notes that fixed-term employees and part-time workers have the right not to be treated any less favourably than the employer treats comparable employees on open contracts or full-time workers.

The College objective, in preparing and submitting to the REF, is to operate a process that reflects the four key principles of *transparency, consistency, accountability* and *inclusivity*. The College will carry out this process to ensure that excellent researchers are submitted to the REF in accordance with defined criteria and without regard to any matter other than excellent research and the coherence of the submission. The College has a responsibility to prepare and submit the strongest submission possible, both academically and in order to

facilitate the best possible financial outcome, and this means that decisions will be made according to what constitutes the best possible submission in the circumstances.

In order to ensure full compliance with the College's Equality, Diversity and Inclusion policies and strategies, a full Equality Impact Analysis (EIA) has been carried out while preparing the code of practice, and further assessments are planned at later stages. The EIA has been prepared following College guidance (https://www.kcl.ac.uk/hr/diversity/guidance-and-resources/Equality-Analysis.aspx) and has enabled the College to assess the perceived impact that the policies identified in the Code might have on protected groups, mitigate any adverse impact and draw on opportunities from any positive impact identified.

The first EIA was carried out under the advice of the College's Diversity and Inclusion Unit during March 2019, the completed EIA template is included as **Appendix 1**.

The Code of Practice was prepared according to the Guidance on Codes of Practice provided by Research England (http://ref.ac.uk/publications/guidance-on-codes-of-practice-201903/). The national guidance that will be followed when preparing for the REF can be found at http://www.ref.ac.uk/publications/.

1.2 Update of actions taken since REF 2014

King's College London recognised excellence and innovation in research as one of the five pillars of its Strategic Vision 2029, a 2017 publication which enshrines the university's priorities across all of the areas in which it works, ahead of its 200th anniversary. The delivery of the Vision's goals is supported by the Research Strategy and Action Plan, outlining the university's commitment to enable informative and innovative research supported by world-class facilities.

Many of the initiatives taken by King's in recent years have reflected the priorities of Research England and the REF. Since 2016, the King's Together Seed Fund scheme has offered £1 million per annum to support the development of multi- and inter- disciplinary projects that address the university's strategic research themes such as Sustainable Growth, and Culture & Identity.

In signing the Declaration on Research Assessment (DORA), King's has ratified its recognition of the limitations of relying on journal impact factors and other traditional metrics to measure research success. King's is now developing a robust framework to more holistically evaluate research quality.

King's has introduced a process for recognising the effect of personal circumstances on research performance as part of its Promotion pathway, adapting the system implemented in REF2014. The university recognises the value of such a process in ensuring that success in the academic and research environment is inclusive of all staff.

Following the principles of the UK Concordat to Support the Career Development of Researchers, the Centre for Research Staff Development was launched in 2016 as a way to engage with research staff through courses, events, and other support, to help them achieve their potential, including progression into permanent academic (research and teaching) roles allowing for independence in research recognised as part of the REF.

Diversity & Inclusion (D&I) has been recognised as a priority area for development at the university, with aims to enable awareness and knowledge across all staff and students and to integrate the principles into every aspect of research life at King's. The university has made strong initial steps following a high-level external audit of D&I within King's and the creation of a Director of Diversity & Inclusion role.

The training offered to all staff has been expanded to cover a wider range of D&I-related issues, and an innovative *Structural Inequalities* training programme for the Senior Management Team has been launched. Communities and Networks such as Parents &

Carers, LGBTQ+ Network launched, developing networks for gender equality and BAME staff groups have also been introduced.

Success has been seen in the attainment of Silver or Bronze Athena SWAN awards across many of the university departments, with actions specifically focusing on research outputs such as Early Career Researcher mentoring, grant writing days, bridging funding, and improvements in Personal Development Reviews. King's has been a Stonewall Diversity Champion since 2016 and will be seeking to make its first submission for the Workplace Equality Index award in 2019. It is also is a member of Business Disability Forum and has obtained the Race Equality Charter Bronze Award in 2015. In 2018, King's was accredited as a London Living Wage employer.

1.3 How the institution is addressing the principles of Transparency, Consistency, Accountability, and Inclusivity in demonstrating fairness

- Transparency:
    - o The interim Code of Practice was made available to all staff on the intranet in October 2018 to inform staff of King's approach to staff and output selection (included as **Appendix 6**)
    - o Notes from REF Oversight Group meetings have been made available to all staff on the intranet to ensure that staff are aware of REF-related decisions and how they were reached.
    - o UOA Leads will share with individuals any decisions that affect them directly, with detail and rationale given in cases where the staff's submission is to be treated as an exception to the standard submission policies.
    - o Allowing for individuals to query any decisions made where they would like more details, and to appeal decisions made about their eligibility for submission where processes have not been correctly followed.
    - o The final Code of Practice will be available for all staff on the intranet in an accessible format from 7 June 2019. Any feedback from Research England on the Code of Practice will be communicated to staff.
- Consistency
    - o Final decisions will be made at an institutional level by the REF Oversight Group.
    - o Policies will come into place as early as it is possible for an informed decision to be made.
- Accountability
    - o Clear governance structures, including details of staff responsibilities for decision-making are detailed in the Code of Practice and communicated to staff.
- Inclusivity
    - o All staff will be invited to various formal and informal meetings within which information or concerns can be used to inform decisions via the set organisational channels
    - o Senior management ED&I representative in REF Oversight Group membership
    - o Establishment of the King's EDAP - reaching out to existing networks where these exist and seeking experience of members of staff who can represent a minority or marginalised group where these are not represented by an existing structure within the College. Further details in Appendix 5.

1.4 Plans for communicating the Code to staff across the Institution

The Code of Practice will be placed on the College intranet and will be made available in accessible formats for the visually impaired. Any amendments requested by Research England, as well as the College's response, will also be shared on the same platform.

The final version of the Code of Practice will be disseminated to staff via the College's usual internal communications channels, to ensure that there is broad awareness of the Code across the College and of how it will be implemented at King's. These channels include:

(a)   The College's Academic Board, REF Oversight Group and College Research Committee will approve the Code of Practice in May 2019;

(b)   Targeted communication will be made to School, Main Panel and UOA leads, and the Research Support teams;

(c)   The Code of Practice will be placed in a prominent position on the dedicated intranet pages for the REF;

(d)   Code of Practice and Applicable Circumstances information sessions will be held monthly from March 2019. These sessions will be open to all staff and at least one session will be held at each of the King's campuses.

(e)   Information sessions for staff involved in the REF have been taking place on a regular basis since July 2018, at which key aspects related to the Code of Practice development have been discussed; this both provides an opportunity for informal consultation and feedback, and ensures that the principles underlying the Code are embedded in all relevant procedures and practices;

(f)   A comprehensive training programme for key staff involved in the REF will take place during September-December 2019, at which key aspects of the Code of Practice will be highlighted, to ensure that its principles are firmly embedded in the procedures and practices leading up to the submission.

(g)   In November 2019, a hard copy of the approved Code of Practice will be mailed to all staff who are absent on long-term leave (a period of more than four weeks).

1.5 Policies and Guidance on selection and submission.

1.5.1 Overview

Whilst submission to the REF is based around individual Units of Assessment (UOA), the overall submission is an institutional submission and the College retains the right to make the final decision of what is to be included in submission and which UOA staff are allocated to. Each UOA submission must demonstrate the international excellence of the College's research and aim to optimise the financial return to the College. Decisions about the configuration and content of submissions need to be made to demonstrate the research strengths of the institution as a whole.

One of the main pillars of the College's Research Strategy is the retention, development and recruitment of world class talent. The College retains its commitment from its 2011-2016 Strategy Review to encouraging all academic (research and teaching) staff to perform at an internationally excellent or world leading level, and to offer guidance and support where this is not being achieved through formal personal development reviews and throughout their careers.

It is also hoped that, where possible, UOAs should improve on REF 2014 results (if relevant) and should attain a profile within the upper quartile for that discipline nationally. The application of this general rule will vary for different panels and UOAs.

Therefore, the requirement introduced by Research England for REF 2021 for all staff submissions to include all eligible staff is one that is embraced by the College, as all new and existing academic (research and teaching) staff are encouraged and supported in their efforts to deliver research of the highest quality in their disciplines. The expectation is that all Units of Assessment will submit a high-quality submission which incorporates outputs from all Category A eligible staff in that field.

1.5.2 Staff selection

The process to be followed when preparing the College submission to the REF will be as follows:

As stated in the REF 2021 Decisions on Staff and Outputs, 'Category A eligible' staff are defined as:

> *staff meeting core eligibility criteria, who will form the total pool of eligible staff. Building on the definition of Category A staff in REF 2014, 'Category A eligible' staff will be defined as academic staff with a contract of employment of 0.2 full-time equivalent (FTE) or greater, on the payroll of the submitting institution on the census date, whose primary employment function is to undertake either 'research only' or 'teaching and research'. Staff should have a substantive connection with the submitting institution […]. For staff on 'research only' contracts, the eligible pool should only include those who are independent researchers, and not research assistants…*

'Category A submitted' describes:

> *the staff from among the total pool who have been identified as having significant responsibility for research on the census date. This will include all staff on research-only contracts who are 'Category A eligible'. Staff on 'teaching and research' contracts will be included according to the processes described [elsewhere in the guidance].*

In the course of preparations for the REF, the College will establish which staff are eligible according to these definitions and additional information outlined in guidance from Research England and the main panels. The College will independently develop a policy to identify staff who are independent researchers. More detail on these policies is available in the sections (**Part 2** and **Part 3**) below.

1.5.3 Substantive connection to the university

As stated in the REF 2021 Decisions on Staff and Outputs, 'Category A eligible' staff should have a *substantive connection with the submitting institution*, with a minimum eligible fractional contract of 0.2FTE. Where a staff member is on a minimal fractional contract of 0.2-0.29FTE, the submitting institution is required to provide a short statement evidencing the clear connection of the staff member with the submitting unit.

The College will identify Category A eligible staff on 0.2FTE – 0.29FTE contracts through internal Human Resources data and consultation with Faculties. As part of the process, the eligible fractional contract will be monitored, and the connection of all staff members on minimal fractional contracts with the submitting unit will be reviewed.

Indicators of a substantive connection will be (although not limited to):

- evidence of participation in and contribution to the unit's research environment, such as involvement in research centres or clusters, research leadership activities, supervision of research staff, or supervision of postgraduate research (PGR) students

- evidence of wider involvement in the institution, for example through teaching, knowledge exchange, administrative, and/or governance roles and responsibilities

- evidence of research activity focused in the institution (such as through publication affiliation, shared grant applications or grants held with the HEI)

- period of time with the institution (including prospective time, as indicated through length of contract).

Following identification through HR records, each of the identified staff members will be contacted by the central REF team, no later than September 2019, and asked to produce, in collaboration with the UOA Lead, a statement identifying -where present- the indicator(s) of their connection, as described above. Statements will be written no later than 31st March 2020 (an additional deadline will be available in July 2020, for staff appointed in the months before the census date).

- Statements will be evaluated by the Main Panel Lead, and a recommendation for inclusion or not will be made with advice from the staff member's line manager.
- Recommendations on eligibility of staff members, will be ratified by the REF Oversight Group at its next meeting.
- Any appeals on the decision will follow the process detailed below (see **Section 3.3**).

Part 2: Identifying staff with significant responsibility for research

King's College London will submit all Category A eligible staff in all UOAs:

- Academic staff on "research and teaching" contracts
- Staff on research-only contracts who hold an independent research fellowship (see http://ref.ac.uk/guidance/additional-guidance/'List of independent fellowships')
- Staff on research-only contracts whose roles carry an expectation of independent research, who have been allocated the time and resources to undertake independent research. The process for determining the eligibility of such staff is outlined in Part 3 below.

Part 3: Determining research independence

3.1 Policies and procedures

King's College London considers all Academic staff on "research and teaching" contracts to meet the REF definition of an independent researcher and will submit all staff on Academic "research and teaching" contracts. Therefore, the sections below should be considered to apply to staff on *research-only* contracts (unless otherwise specified).

3.1.1 Criteria used to identify independent research staff

The College will use the following indicators of independence to identity eligible research-only staff:

- leading or acting as principal investigator or equivalent on an externally funded research project;
- holding an independently won, competitively awarded fellowship where research independence is a requirement. An illustrative, but not exhaustive, list of independent fellowships can be found at www.ref.ac.uk, under Guidance;
- leading a research group or a substantial or specialised work package.

Staff and their line managers have been asked to reflect on these indicators as part of their yearly Performance Development Reviews; in order to ensure that all eligible staff are identified and included in the submission, the process underlined in section 3.1.3 will be undertaken.

3.1.2 Communication process and timescales

Please see Part 1 for the relevant Communication plans related to the identification policy. Details on the communications and timelines specific to the decision-making process are discussed in Section 3.1.3 below.

All staff identified as fulfilling one or more of the indicators listed in Section 3.1.1 will undergo a more detailed review to identify whether they indeed satisfy the independence criteria. The key steps of the process are identified below.

September 2019 [Staff appointed after 1 September 2019 will be contacted in January 2020] [Staff appointed after 1 February will be contacted in July 2020]	Staff on research-only contracts (with an end date of 31July 2020 or later) identified through HR records. Identified staff contacted by central REF team and asked to complete an online web-form to determine whether or not they meet the criteria of research independence.
October 2019 [February 2020 for staff appointed after 1 September 2019] [August 2020 for staff appointed after 1 February 2020]	Information provided to the UOA Lead for the relevant UOA who makes a recommendation to the Main Panel Lead. The Main Panel Lead chooses to accept or reject the recommendation, based on the information provided and communicates the decision to the REF Oversight Group.
November 2019 [February 2020 for staff appointed after 1 September 2019] [August 2020 for staff appointed after 1 February 2020]	REF Oversight Group ratifies the decision at its termly meeting. Staff are informed of the decision by the UOA lead and are able to appeal according to the process detailed at **section 3.3** below.

3.2 Staff, committees and training (see paragraphs Error! Reference source not found. **to REF _Ref519692909 \r \h * MERGEFORMAT** Error! Reference source not found.**).**

The arrangements for the management and governance of the REF are those that are in place to manage and govern the College as a whole. Ultimate responsibility for the College's submission to the REF rests with the Principal, advised by the Principal's Central Team. Submission to the REF is based on a group of individual submissions to Units of Assessment. However, in accordance with the College's research strategy, final decisions on the inclusion or otherwise of staff and UOA profiles must prioritise:

- demonstrating to the full the College's research strengths
- sustaining its reputation as a centre of international excellence
- securing the funding necessary to support future research

A set of guiding principles can be found at **Appendix 2** and a flow chart indicating levels and areas of responsibility within the College is attached as **Appendix 3.**

The Vice-Principal (Research), has delegated responsibility for the College submission. A REF Oversight Group, chaired by the Vice-Principal, has been established to oversee the College's preparations and monitor progress towards the final submission. The terms of reference and membership of the Group can be found as **Appendix 4**. The REF Oversight Group is responsible to the Principal via the Principal's Central Team and is composed of senior officers and managers who have responsibility for research governance and management within the College.

The College Research Committee will have responsibility for the oversight of policy and governance matters relating to the REF including the approval of the Code of Practice.

The co-ordination of the REF will be undertaken by the Research Management and Innovation Directorate under the leadership of the Operations Director (Research & Researchers), Dr Martin Kirk (martin.kirk@kcl.ac.uk). The central administrative lead and REF institutional contact is Jo Lakey, REF Delivery Director, jo.lakey@kcl.ac.uk.

3.2.1 Procedures for identifying designated staff and committees / panels responsible for determining research independence (distinguishing between those with advisory and those with decision making roles)

The role of the key staff and committees responsible for determining research independence is outlined below – more detailed on corresponding Terms of Reference and/or Job Descriptions, where appropriate, can be found in Appendix 4-5.

- **Vice-Principal (Research)** has delegated responsibility for the College's REF submission and is therefore ultimately responsible for the identification of staff. The decision is taken based on recommendation from the respective Main Panel leads and/or the REF Oversight Group.
- **REF Oversight Group** (ToRs available in Appendix 4) is responsible for ratifying any decision on staff eligibility: in doing so, they will consider, where relevant, evidence provided by the Main Panel leads, the King's EDAP, the staff member and their line manager. The Group has been established to oversee the College's preparations and advise on key, College-level decisions. Group members have been selected to reflect the breadth of research activity across College and include members of King's Senior Management Team as well as the academic leads for each of the Main Panel submissions. The Group also includes the Professional Services leads for Research, and Diversity and Inclusion.
- The **Main Panel Leads** for each of the main panels are responsible for making the final recommendation on the eligibility of staff, based on advice from the relevant Unit of Assessment leads, and input from the staff member and their line manager. The Main Panel Leads have been selected amongst College Leadership (Executive Deans/Vice-Deans Research) with experience in past REF/RAE exercises (to inform the upcoming process).
- The **Unit of Assessment Leads** for each of the UOAs are responsible for advising the Main Panel Lead on the eligibility of staff, considering disciplinary practices. They will base their recommendation on factual information, workload models, input from staff members and their line managers, and advice from the King's EDAP. The UOA Leads have been selected from the research leads in the Departments mainly associated to each UOA.
- The **King's Equality and Diversity Advisory Panel (EDAP)** (Terms of Reference available in **Appendix 5**) will review and advise the staff and committees identified above to ensure that appropriate consideration has been given to equality, diversity and inclusion factors, and that processes reflect good practice and learnings from the Equality Impact Assessments (EIA). Members of the group are staff with an interest, or expertise, in equality and diversity.
- The **Applicable Circumstances Review Subpanel** is a subset of the King's EDAP, and includes the Director of Diversity and Inclusion and at least two members of the King's EDAP. Members have been chosen based on their experience in ED&I issues and how they affect productivity at work, as well as because of their independence from other decisions made regarding individuals and their submission.

<u>3.2.2 Details of training provided to individuals and committees involved in identifying staff, the timescale for delivery, and content (including how it has been tailored to REF).</u>

The College recognises the critical role of training, in ensuring that the principles of Consistency and Inclusivity are applied. As such, a bespoke training schedule has been put in place for all staff involved in the REF. In particular, as regards the identification of staff, the following is planned:

A *bespoke Equality, Diversity and Inclusion in REF workshop* has been developed to address diversity issues that might arise as part of the REF. This half-day training event (first delivered in November 2018) covers the relevant legislation, best practice, and scenario development. The course is **mandatory** for all members of the REF Oversight Group and all Unit of Assessment Leads and will also be available to members of the King's EDAP.

The bespoke training session will ensure that staff members have an:

- Understanding of conscious and unconscious bias and how it can feature in REF decisions within the context of REF and King's College London policies;
- Understanding of how to prevent or resolve equalities related issues before or after they arise;
- Ability to recognise the implicit and explicit value of Equality, Diversity & Inclusion (ED&I) in the REF submission and an understanding of how to incorporate this within the staff and outputs selection processes;
- Understanding of the internal structures and processes around ED&I, both for REF (King's Equality and Diversity Advisory Group, Applicable Circumstances and appeals policies) and in the wider university environment (KCL policies, training and resources).
- Understanding of the purpose and process for the Equality Impact Assessments for output pools and Impact Case Studies

The training will be delivered by Challenge Consultancy and includes a session with Sarah Guerra, Director of Diversity & Inclusion and member of the REF Equality and Diversity Advisory Panel, and Jo Lakey, REF Delivery Director, who will cover REF-specific scenarios that may arise as a result of the policies and procedures developed and implemented by Research England and/or the Code of Practice. Following this training, we want to be confident that eligible researchers are submitted to the REF in accordance with defined criteria and without regard to matters other than excellent research and the coherence of the submission.

Training was delivered on 15th and 29th November 2018, with further sessions planned for 31st October and 12th November 2019.

All staff with management responsibility at King's (therefore including all line managers of staff being considered as part of the identification process) are expected to attend ED&I training.

All College staff are expected to complete mandatory training on Data Protection (updated to include new GDPR regulation).

3.3 Appeals

An open and robust appeals process is critical to guarantee that the principles of transparency and consistency are applied in all decision making. By clearly communicating the staff identification process, and including staff input in the decision-making phase, we aim to ensure that decisions are transparent from the start. A clearly communicated and easily accessible appeals process will also offer a mechanism for all staff to query decisions about their eligibility, and have their circumstances reviewed independently: this will not only ensure that staff can fully engage with decisions that involve them, but also guarantee the level of consistency across decisions made by different people (for example in the case of staff identification where the recommendations are made at UOA and Panel level).

Staff who disagree with the decision made about their eligibility for submission to the REF shall have the right to appeal against the decision. The grounds for appeal will be considered by the **Appeals Subpanel**, who will make a final decision on the matter.

The Appeals Subpanel will review all appeals to decisions related to the REF and decide whether to reject or uphold the appeal. Each Appeals Subpanel meeting will be chaired by a Vice Dean (Research) from a different Main Panel area from the appellant.

To raise an appeal, staff will complete the *'Appeal form'* and return it together with any supporting documentation to REF-confidential@kcl.ac.uk. Appeals will be managed by the Appeals Subpanel Secretary, who will be an individual from the Research Management and Innovation Directorate not otherwise involved in the REF staff or output selection process.

On the first of each month, the Appeals Subpanel Secretary will contact the relevant Chair to review any appeals received. The Appeals Subpanel Chair and Secretary will consider within five working days of receipt of the documentation whether the appeal is eligible on the grounds given above.

Eligible grounds to appeal include:

- Policy has been incorrectly applied, possibly through use of inaccurate staff data;
- Policy does not reflect the nuances of employment status, i.e., the policy should be adjusted, or an exception allowed;
- Development process, or application, of the policy has been subject to bias.

As needed, the Secretary will convene the Appeals Subpanel to review the eligible appeals. The panel will normally consist of the Chair and at least two members of the King's EDAP. None of the members of the Appeals Subpanel will have had any direct involvement in any of the processes leading up to the appeal.

UOA Leads will be notified of any appeals and will be provided with the submitted information. They will be asked to provide a response within 15 working days of receipt.

Eligible appeals submitted by the first of the month, will be considered at an Appeals Subpanel meeting by the end of that month.

The Appeals Subpanel will normally seek to provide its decision to the appellant, in writing, within 12 working days of the appeal hearing. If there is likely to be any delay in providing an adjudication, the Secretary will advise accordingly.

The decision of the Appeals Subpanel will be final and there will be no further avenue for appeal within the College or for consideration under any other College procedure.

Appeals calling into question the objectivity of the development process for the policy itself will be referred to the King's EDAP.

3.3.2 Communication plans

The appeals process will be described to staff within the email from their UOA lead confirming their eligibility status. The email outline with a link to the same information will be hosted on the intranet. This will outline the steps to be taken by staff to raise their claim, how the appeals will be assessed, and timeframes for the process.

3.4 Equality impact assessment

An equality impact assessment will be carried out following each iteration of the research independence process.

Data relating to the all staff on research-only contracts will be used as the benchmark for the profile of protected characteristics of the cohort deemed to meet the criteria for independence, once the process described above has been completed. The data will be

considered by the King's EDAP, who will provide advice to the REF Oversight Group. If any group is over or under-represented within the cohort, the process will be reviewed to ensure that it is not discriminatory. In the event that a fundamental issue is identified that is beyond the remit of the REF Code of Practice, the King's EDAP will refer the matter to the College Research Committee for <u>action</u> and will require the outcome to be reflected in the REF5a and/or REF5b.

Part 4: Selection of outputs

In the process of preparing for the REF, each Unit of Assessment (UOA) will review selected outputs for all staff identified as eligible for submission. As indicated above, it is the expectation of the College that all eligible staff will have produced several research outputs (depending on their circumstances) that may be considered for submission.

The output selection process for each UOA consists of peer-review and scenario-modelling. The College will ensure that fairness, inclusivity and transparency runs through each procedure, including considerations for applicable circumstances which may affect the number of outputs submitted.

4.1 Policies and procedures

The College's Research Strategy underlines the importance of broadening the research base whilst improving quality. The document states:

> *Regarding the quality of research outputs, we will encourage and support researchers to produce the highest quality outputs for their work – whether journal publications, monographs, compositions or other methods. We will prepare for the research excellence framework (REF) and work with faculties, ensuring all have the support needed to plan, deliver and record high quality outputs.*

This was the key driver and rationale for the development of the process for the output evaluation.

The more detailed procedures outlined in this section were approved by the REF Oversight Group after consultation with the UOA and Main Panel leads.

The process for the selection of outputs is composed of two components: output evaluation and output selection.

- **Output evaluation** The evaluation process has been carried out at UOA level, since the College acknowledges the importance of disciplinary knowledge to accurately evaluate the quality of outputs. This evaluation stage is seen as a continuous process that forms part of the College's drive to encourage and support excellent in research. The key stages in the evaluation process are:
  - **Output identification** In areas where it is unrealistic to review all outputs, staff members are asked to identify appropriate outputs for review. In addition to self-selection, the College may make use of other quantitative measure (e.g. bibliographic analysis) to identity additional outputs which might not have been chosen by staff members.
  - **Output review** All selected outputs are read by at least two reviewers and scored against the REF criteria as published by Research England. The scores are recorded against the outputs and inform the output selection process discussed below. Reviewers and advisors are selected on the basis of relevant research expertise and as far as possible represent the cohort of eligible staff. This approach is informed by the standards and practices described by the REF sub-panels.
- **Output selection** The selection of outputs for the REF submission will be carried out according to the principle of optimising the configuration of each UOA. The data generated by the output evaluation process described above will enable UOAs to select one output for each Category A eligible member of staff, and then to select the

remainder of the outputs to maximise the quality of the overall submission. Selection decisions may change if it is possible to make the submission more inclusive without diminution of the overall quality. Where decisions need to be made between outputs which have been internally evaluated as being of the same quality the UOA Lead and Main Panel lead will firstly consider protected characteristics and seek to maximise input from underrepresented groups (where the information is available) and secondly representation of research areas. Decisions regarding the final choice of outputs to be selected will be taken at UOA level, although advice will be given by the Main Panel Lead or by the REF Oversight Group where appropriate. UOAs may choose to include outputs from former members of staff where this enhances the overall quality of the submission, but King's College London will not submit outputs from former members of staff who were made compulsorily redundant, after a performance management process, during the REF period.

As discussed in earlier sections, the process of outputs identification can be split into two separate steps: the first focusing on outputs evaluation (which is part of a move towards continuous evaluation of research quality within College) and the second aiming at selecting outputs in order to optimise the College's REF submission. The overall process started in early 2018, and will finish in November 2020 (before final submission).

Spring/Summer 2018	- First evaluation phase for outputs from academic staff[3].
Early 2019	- Comments and predicted output scores derived from the review exercise shared with staff members - Where it is identified that a staff member who is eligible for submission does not have an output, they will be informed, provided with the appropriate support and mentoring to improve their research, and set targets to attain within a specific time period.[4].
Spring/Summer 2019	- Second evaluation phase for outputs from academic staff - First evaluation phase for outputs from independent research staff and from former staff members
Autumn/Winter 2019	- Simulation of REF submission based on the predicted grades from the evaluation exercise and guidance from Research England.
Early 2020	- Comments and predicted grades derived from the review exercise shared with staff members.

---

[3] In some UOAs staff on research-only contracts were excluded from the first evaluation phase whilst College waited for further guidance on the definition of "independence"

[4] The output peer-review process will facilitate the identification of staff who need support for the production of REF eligible outputs as part of their ongoing career development.

Spring/Summer 2020	- Final evaluation phase for outputs from academic staff
	- Final evaluation phase for outputs from independent research staff and from former staff members
Autumn 2020	- Final output selection to be done based on the predicted grades from the evaluation exercise.
	- Comments and predicted grades derived from the review exercise shared with staff members.
	- Staff will receive confirmation of the outputs attributed to them in the submission in September 2020

Adoption of the REF output identification process for other uses

The REF Oversight Group only has responsibility for overseeing the REF, and not broader performance development processes. For this reason, the policy outlined in this section for the evaluation and selection of outputs is limited to the REF 2021 submission. It is acknowledged that in some Faculties the results of the output evaluation has been used as part of a broader dataset in the Performance Development Review (PDR) process; where this has happened, the decision was made by Faculty Senior Management and was based on Faculty strategy and priorities.

4.2 Staff, committees and training (see paragraphs Error! Reference source not found. **to REF _Ref519692909 \r \h * MERGEFORMAT** Error! Reference source not found.**)***.*

Please see Section 3.2 for details on the staff and committees involved in the decision making, as well as information on the training provided to them.

4.3 Staff circumstances

As discussed in previous sections, King's College London welcomes Research England's encouragement to fairly represent the research of all of King's researchers, and the key goal of the policies and procedures set out in this document is to achieve this. The College is fully committed to supporting and promoting equality, diversity and inclusion in research careers, and we welcome Research England's commitment in this area and the measures put in place to recognise the effect that individuals' circumstances might have on research productivity.

In the following sections we outline the procedures that have been put in place to allow staff to voluntarily disclose circumstances in a confidential matter, and for College to evaluate such circumstances and take necessary steps to ensure a strong and comprehensive submission that reflects the excellence of our research as well as considering any factors that might have affected research productivity.

All circumstances disclosed as part of the process are treated as confidential and will not be shared in a manner allowing for personal identification.

No central data source will be used to inform identification of any of the circumstances above.

Applicable Circumstances Review Subpanel

In developing the procedures for considering staff circumstances, College has been guided by the following guiding principles, which have led to the creation of an Applicable Circumstances Review Subpanel (see Appendix 5) that will be responsible for considering all requests in this area.

- *Inclusivity:* King's is fully committed to supporting equality, diversity and inclusion, and recognises the importance of considering staff circumstances to achieve this. The Applicable Circumstances Review Subpanel (ACRS) will be selected as a sub-group of the King's EDAP and brings together ED&I experts from across College.
- *Confidentiality:* all members of the ACRS will be requested to treat information they receive as part of their duties as strictly confidential. Decisions made based on the review of circumstances will only be disclosed where strictly necessary (e.g. to the staff member affected, and their UOA/Main Panel lead) and should only include the level of information necessary to justify the decision in the final REF submission.
- *Consistency and transparency:* by identifying a specific group that considers all circumstances requests based on published and agreed criteria, we ensure consistency in decisions made across all research areas and circumstances types.
- *Independence:* members of the ACRS are not involved in any other decision involving individual staff members (such as evaluation of outputs, or staff identification): as such their decisions will not affect any other area of the REF submission.

GDPR and personal data

Data provided as part of applicable circumstances requests will be processed in accordance with King's data protection policies and staff privacy notice and in compliance with current data protection legislation – General Data Protection Regulation (EU) 2016/679 and the Data Protection Act 2018 – and all other legal obligations.

4.3.1 Procedures for staff to disclose circumstances in a confidential manner

Staff members will be invited to disclose, in confidence, relevant circumstances that have impacted their capacity to contribute to the pool of eligible outputs. The outcome of the disclosure process (outlined below) may mean:

- that an individual has had such exceptional circumstances that they can be submitted without the minimum of one output, without penalty; and/or
- that there is a case for submitting a request for a UOA output reduction

Staff wishing to disclose circumstances will complete an online form, including the information below:

- Brief description of the circumstances being disclosed, with reference to the relevant guidance from Research England;
- Where the circumstances being disclosed fall under the "Other Circumstances" category, a brief discussion on how they have affected research productivity;
- Any supporting evidence need not be submitted, but may be requested by the ACRS.

The disclosures made via online form will only be accessed by the central REF team and all documentation considered by the ACRS will be anonymised.

Following consideration by the ACRS, UOA Leads will receive the name(s) of any individual(s) within the UOA who can be submitted without the minimum of one output. The details of the circumstances will not be disclosed.

UOA Leads will also receive details of the total reduction that the UOA could request, based on the cumulative effect of the circumstances disclosed. They will not be given the names of individuals or details of circumstances, but will receive a tally of the types of circumstances disclosed for the UOA.

All documentation submitted to the ACRS will be destroyed by March 2022.

Timeline for circumstance disclosure

From March 2019	Process for the disclosure of circumstances communicated to all staff, including deadline for submissions and dates for ACRS meetings
June 2019	Online form for circumstances disclosure goes live.
September 2019	First deadline for circumstances to be considered
October 2019	- Meeting of the ACRS and consideration of disclosures - Recommendations for UOA reductions to be communicated to UOA Leads
January 2020	Second deadline for circumstances to be considered
February 2020	- Meeting of the ACRS and consideration of disclosures - Recommendations for UOA reductions to be communicated to UOA Leads -UOA Leads to confirm whether they wish to request reductions
March 2020	Deadline for submission to Research England
July 2020	Final deadline for late disclosures. ACRS meeting to consider late disclosures.

<u>4.3.2 Procedures for taking into account the effect of staff circumstances in relation to the unit's total output requirement</u>

Research England have provided a list of applicable circumstances where units may submit a reduced number of outputs without incurring penalty.

Staff members who have applicable circumstances will be invited to make a voluntary disclosure to the ACRS (following the procedure discussed in Section 4.3.1 above). The ACRS will make a recommendation to reduce the number of outputs in the UOA based on their judgement of the cumulative effect of applicable circumstances on the productivity of the UOA over the REF assessment period. Proposed reductions will not result in a smaller total output requirement than the number of Category A submitted staff in the unit for whom a minimum of one output is required. UOA Leads will confirm whether they wish to request any recommended reduction before the end of February 2020.

    a. *Qualifying as an early career researcher (ECR)*. For the purposes of the REF, the definition is a staff member who first met the definition of an ECR after 1 August

2016. ECRs hold a contract of employment of 0.2 FTE or greater, which includes a primary employment function of undertaking 'research' or 'teaching and research', with any HEI or other organisation, whether in the UK or overseas, and also meet the REF 2021 definition of an independent researcher. The College will apply, where agreed, the output reduction in line with Table L1 in the Guidance on Submissions.

b. *Absence from work due to secondments or career breaks.* The College will apply, where agreed, the output reduction in line with Table L2 in the Guidance on Submissions.

c. *Qualifying periods of family-related leave.* The College will apply, where agreed, the reduction of one output for each discrete period of statutory or additional parental or adoption leave taken during the census period where it qualifies.

d. *Other circumstances that apply in UOAs 1–6.* Category A submitted staff who are junior clinical academics (i.e., clinically qualified academics who are still completing their clinical training in medicine or dentistry and have not gained a Certificate of Completion of Training (CCT) or its equivalent prior to 31 July 2020) will be encouraged to apply to the ACRS (following the procedure discussed in Section 4.3.1 above) should they wish their circumstances to be considered..

e. *Circumstances equivalent to absence, that require a judgement about the appropriate reduction in outputs.* i. Disability: this is defined in REF 2018/03, Table 1 under 'Disability'. ii. Ill health, injury, or mental health conditions. iii. Constraints relating to pregnancy, maternity, paternity, adoption or childcare that fall outside of – or justify the reduction of further outputs in addition to – the allowances above. iv. Other caring responsibilities (such as caring for an elderly or disabled family member). v. Gender reassignment. vi. Other circumstances relating to the protected characteristics listed in REF 2018/03, Table 1, or relating to activities protected by employment legislation. The College will apply, where agreed, reductions as set out in Table L2.

f. Where staff have been affected by a combination of circumstances, the ACRS will use their discretion to assess the reduction amount to recommend.

In line with the REF team's procedure for the evaluation of circumstances, the ACRS will consider all disclosures according to the following guidelines:

- For disclosures with defined reductions, the focus will be on whether sufficient information has been provided and the guidance applied correctly.
- For disclosures requiring a judgement about reductions, or where it would be appropriate to remove the required minimum of one output, the ACRS will make a judgement about the effect of the circumstances in terms of the equivalent period of time absent, and will provide a brief rationale for this judgement.

4.3.3 Procedures for taking into account the effect of circumstances whose effect on an individual staff member is such that they do not have the required minimum of one output.

Each faculty has had an Academic Performance Framework in place since May 2017. These provide clarity of expectations for academic staff at each academic grade. They were developed by faculties in collaboration with staff and are an accepted outline of performance expectations and support in place. The academic performance framework and PDR processes have in built support set against the overall approach of the organisation as outlined above. These enable individuals to discuss issues and identify ways forward with their line managers or where needed HR. In addition, King's has an employee assistance programme that individuals can access for personal support. All staff eligible to be submitted to the REF are encouraged by their Heads of School and UOA Leads to raise any matters that have prevented them from producing the minimum requirement of one output within the REF census period. Staff are actively encouraged to raise such matters at any time, but the procedure outlined in Section 4.3.1 outlines the key dates to allow for full consideration of circumstances.

Fixed term employees and Part-time workers

The College notes under the Regulations for Fixed term employees and Part-time Workers that were established in 2000, that fixed term employees and part time workers have the right not to be treated any less favourably than staff on open contracts and full-time workers. The College is committed to pursuing equality of opportunity for all staff, including those on fixed-term contracts and those who work part-time.

The College expects all researchers with at least the 0.2 FTE required for "Category A eligible" classification to have at least one output for submission. Part-time staff may request an exemption from the minimum of one output (or a reduction in the UOA's total output volume), for example, where the FTE of a staff member late in the assessment period does not reflect their average FTE over the period as a whole. Affected staff members should make a disclosure to the ACRS (following the procedure discussed in Section 4.3.1 above) if they wish their circumstances to be considered.

4.4 Equality impact assessment

The College ran an interim Equality Impact Assessment (EIA) on the first phase of output evaluation in March 2019. The data was considered by the King's EDAP and the REF Oversight Group. This is included as **Appendix 1**. The data showed no evidence of bias in the output scoring, and showed a high correlation between the characteristics of staff who had had outputs reviewed and the characteristics of staff on academic (teaching and research) contracts.

The EIA will be repeated in March 2020 after the next round of output evaluation is complete, and in Autumn 2020 as the final output selection is done.

Each EIA will be considered by the King's EDAP, who will provide advice and, where necessary, recommendations for action to the REF Oversight Group. In the event that a fundamental issue is identified that is beyond the remit of the REF Code of Practice, the King's EDAP will refer the matter to the College Research Committee for action and will require the outcome to be reflected in the REF5a and/or REF5b.

The College recognises that the review exercise used to guide output selection has potential for bias, but also that it can lead to valuable peer feedback on researchers' recent work from their peers.

Some UOAs are employing a double-blind method of review where it is felt that this is appropriate and can further reduce the likelihood of bias from reviewers on the basis of an author's characteristics.

The College is also aware that the freedom provided in the policy by decoupling staff from their outputs in the submission may lead to an imbalance in the number of authored works returned for each researcher submitted. This could have negative consequences for certain groups of authors, which in turn might be seen as an exploitation of the REF policy by the College or a reflection of existing biases within the discipline or Higher Education sector. The spread of outputs per researcher within each UOA will therefore be included as part of the dataset for the final EIA.

Part 5: Appendices

APPENDIX 1: Interim EIA on Output Submission

Name of Proposed Policy, Practice, Project or Service: King's Research Excellence Code of Practice 2021	New? [Y] Existing? [ ]
Assessment conducted by: Jo Lakey	Date of Assessment: March 2019
Department and Faculty / Directorate: RMID	

1. Aims of the Proposal *What are the aims of the proposal and the intended outcome(s)? What is the scale of the proposal?*
Each institution making a REF submission is required to develop, document and apply a Code of Practice, which describes the institution's policies and processes for determining staff eligibility, and selecting outputs for submission. The aim is to ensure that the protocol for determining staff eligibility and output selection are fair, prevent discrimination, clear and transparent. The REF submission is a core part of institutional funding and also plays a large role in academic professional standing so the scale of the impact of the code of practice is significant.
2. Evidence considered *What data or other information have you used to evaluate if this proposal is likely to have a positive or an adverse impact upon protected groups when implemented? Where were information gaps, and what steps can you take to remedy these gaps? Can the Diversity & Inclusion Dashboard* PowerBI *provide any insight into which protected characteristics are likely to be affected by the changes?*
In developing the Code of Practice the EIA from REF2014 was considered and revisited as was all the guidance produced by REF and other sector bodies on equality. The Director of D&I and D&I team were consulted and involved in REF governance. The King's Equality and Diversity Advisory Panel (EDAP) was established to advise the REF Oversight Group.
An initial dataset, examining the outcomes from the output reviewing exercise was produced in March 2019. Further datasets will be produced in the lead-up to the REF submission, examining output reviewing and decisions about staff eligibility on the basis of research independence. These data will be reviewed by the King's EDAP with recommendations for action being cascaded to Unit of Assessment (UOA) Leads through the Main Panel Leads. Any opportunities or risks for inclusion will be raised to REF Oversight committee.
Areas of risk were identified – see the table below.
3. Consultation. *How have you consulted staff and student communities and representatives including those from protected groups? What were their views? Who else has been consulted in this proposal?*
Each UOA was provided the Code of Practice framework and were given an opportunity to report and ask questions through Main Panel representation at each REF Oversight Group meeting.
The REF Oversight Group has been augmented with D&I expertise and has specifically examined how communications and engagement with staff should work.

REF-focused ED&I training session have been provided for staff involved in REF decision-making, this is to instil all the key figures within REF processes at King's with a shared understanding of D&I. These sessions also included a discussion session to identify potential risk, issues and concerns about the conduct of REF in relation to EDI. Further sessions are planned to ensure that all staff involved in REF decision-making have attended.

There is a network of D&I leads and practitioners across the university. They were specifically consulted in relation to the REF Code of Practice and asked to identify any issues or concerns. All comments were incorporated into the final version of the Code of Practice.

4. Promoting equality. *Does this policy have a positive impact on equality? What evidence is there to support this? Could it do more?*

The nature of REF is that it recognises academic quality and so if conducted fairly and transparently it should allow talent to surface and King's to recognise its high quality professionals. Using REF information and examining the demographics and particularly those from underrepresented groups can feed into our overall interventions to improve equality.

Also the increased focus of the REF bodies on ED&I has meant a renewed interest and effort in King's successfully achieving externally recognised success such as Athena SWAN, Race Equality Chartermark and the Stonewall Workplace Equality Index – these levers help improve equality at King's.

5. Identifying the impact of policies

Identify any issues in the document which could have an adverse impact on the following groups who are protected by the Equality Act 2010:

1. People from different age groups [age]
2. Disabled people [disability]
3. Women and men [sex]
4. Transgender people [gender identity]
5. Lesbians, gay men and bisexual people [sexual orientation]
6. Women who are pregnant or on maternity leave [pregnancy and maternity]
7. People who are married or in a civil partnership [marriage and civil partnership]
8. Religious people or those with strongly held philosophical beliefs [religion and belief]
9. Black and minority ethnic people [ethnicity]

Issue Assessed	Protected Group	Impact and Evidence	Justification	Proposed Action/Timeline	Person responsible for action(s)
E.g. policy section or practice.		*What are the possible impacts on people from the protected groups above, and explain how you have made that assessment. Are these impacts positive or negative?*	*Can the issue be justified for academic or business reasons? Please explain.*	*If this has a negative impact, what will you do to reduce, minimise or eliminate negative impact?* *If this has a positive impact, how will you promote,*	

				develop or utilise this opportunity?	
Selection/deselection of individuals	All underrepresented groups but our data allows us to consider BME and women most effectively.	The REF2021 guidance states that all eligible staff must be submitted. This reduces the areas of risk in terms of staff selection.	n/a	n/a	n/a
Circumstances that may need to be taken into account to reduce REF participation	All underrepresented groups but our data allows us to consider BME and women most effectively.	Previous rounds and general evidence shows that those who have had time away from the workplace may be penalised. However, the partial de-coupling of staff and outputs in REF2021 reduces the areas of risk in terms of output requirements.	No	A Code of Practice produced and an applicable circumstances framework produced. Detailed thought was given and best practice adopted in terms of providing a framework for applicable circumstances to be considered to reduce the number of REF outputs potentially required. An appeals route will be available for disputed points of process. D&I expertise is on the applicable circumstances board and on the appeals panel.	Jo Lakey
Output selection and scoring being unfair/disproportionate	All underrepresented groups but our data	Output selection and scoring play a key role in individual professional standing. Each unit of assessment has undertaken this process differently. There is the possibility	No	The output review process requires outputs to be read by at least two reviewers to reduce potential bias.	Jo Lakey

		the bias conscious or unconscious could lead to differential outcomes for underrepresented groups.		Regular checks will be carried out on scoring data, cross-referenced with data on characteristics. If this identifies any areas of disproportionality they will be investigated.	
Lack of understanding by individuals as to how the process works.	All underrepresented groups but our data allows us to consider BME and women most effectively.	If people are unclear as to how the process works they miss out on opportunities or hamper others success	No	Clear and regular communications and engagement – all information will be available online and information sessions will be held on different campuses.	Jo Lakey
Lack of competence/EDI capacity in reviewers and those with oversight.	All underrepresented groups but our data allows us to consider BME and women most effectively.	If those involved in reviewing outputs or managing/governing REF are lacking in knowledge and insight into how unequal outcomes can arise they will not be able to put in place processes to prevent them or spot and deal with issues as they arise	No	EDI training for all those involved	Jo Lakey/ UOA Leads
Lack of sufficiently granular and reliable data to monitor issues	All underrepresented groups but our data allows us to consider	To be able to understand and monitor problems, data needs to be collected and reviewed. This data needs to be of high enough quality and detailed enough to identify issues. King's has a number of	No	Pure system to be properly populated and maintained. Data to be cross referenced with HR data.	Jo Lakey

	BME and women most effectively.	systems and historic data incapacity issues			

6. Monitoring *How will you monitor the actual impact that your proposal has had following its implementation? When will you do this?*

An initial dataset, examining the outcomes from the output reviewing exercise was produced in March 2019. Further datasets will be produced in the lead-up to the REF submission, examining output reviewing and decisions about staff eligibility on the basis of research independence. These data will be reviewed by the King's EDAP with recommendations for action being considered by the REF Oversight Group and cascaded to Unit of Assessment (UOA) Leads through the Main Panel Leads.

The initial dataset (included as Appendix A) focusing on output selection indicated that there was strong correlation between the characteristics of staff who had had outputs reviewed and staff on academic (teaching and research contracts), which was to be expected given that the initial reviewing exercise focused on staff who were already known to be eligible for submission. The initial scoring data did not appear to show any statistically significant bias towards any particular group.

7. Summary *Summarise the outcome of this Equality Assessment, and state any actions you will be taking as a result.*

This assessment identifies some issues that need to be explored to ensure there are no differential outcomes. The actions are summarised in the action column above.

Has a Data Protection Impact Assessment (DPIA) been completed or considered for this project?

If not, explain why a DPIA is not relevant to this project.

DPIAs are mandatory under the General Data Protection Regulation (GDPR) when processing of personal data is likely to result in a high risk to individuals. A DPIA is designed to describe the processing of personal data, assess its necessity and proportionality, and help manage the risks to the rights and freedoms of data subjects which result from this processing, by determining measures to address the risks. This will help us to ensure we comply with our data protection obligations, reduce harm caused to individuals, and prevent reputational and financial damage to the university through a data breach.

Data provided as part of the REF exercise will be processed in accordance with King's data protection policies and staff privacy notice and in compliance with current data protection legislation – General Data Protection Regulation (EU) 2016/679 and the Data Protection Act 2018 – and all other legal obligations.

Assessment Lead: I confirm this Equality Assessment is an honest assessment of the Equality Impact of the proposed policy, practice, project or service.	
Name of Assessment Lead	Jo Lakey
Signed *Lakey* Date 18/3/19	
Head of Department: I am satisfied with the results of this Equality Impact Assessment, and agree to ensure the actions will be undertaken to monitor the actual impact of the proposed policy, practice, project or service.	
Name of Head of Department	Martin Kirk
Signed Martin Kirk Date 19/3/19	
D&I Department Use Only:	Audit Feedback required

Please send the completed form to diversity@kcl.ac.uk

King's College London

Equality Impact Analysis Data for REF Preparations

March 2019

The comparison is between the cohorts of current staff with research-only, or academic (teaching and research) contracts allocated to a unit of assessment (UOA) in Pure, and the staff who have had an output reviewed to date. Review data was taken from Pure on 27 February 2018. Data on characteristics was provided by HR on 28 February 2019. Data could not be provided for four people. These are represented by the (blank) or (#N/A) category.

595 staff were identified with research-only contracts, with 1588 staff on academic (teaching and research) contracts. 555 staff were marked "Eligible" in Pure.

1503 staff had outputs reviewed in the first reviewing exercise undertaken during 2018. Reviewing was not complete in all UOAs. In many UOAs the work of research-only staff had not been reviewed in the initial review exercise because their eligibility for inclusion in the staff submission had not been confirmed.

This data will be considered by the King's EDAP and the REF Oversight Group, and an Equality Impact Analysis will be completed. Where appropriate, recommendations for action will be fed back to the UOA Leads.

Cohort Comparison

The tables below compare the characteristics of staff with research-only and teaching and research contracts with characteristics of the staff with reviewed outputs and the characteristics of the staff marked "Eligible" in Pure.

Sex

	Staff with research-only contracts	Staff with academic (teaching and research contracts)	Staff with reviewed outputs	Staff marked eligible in Pure
Female	50.8%	38.9%	37.9%	46%
Male	49.2%	61.1%	61.9%	54%
(blank)			0.2%	0%

Ethnicity

	Staff with research-only contracts	Staff with academic (teaching and research contracts)	Staff with reviewed outputs	Staff marked eligible in Pure
Asian	10.9%	5.3%	5.5%	11%
Black	2.2%	0.7%	0.7%	2%
Chinese	7.4%	2.8%	2.9%	4%
Information Refused/Not Known	3.4%	4.5%		

			4.5%	4%
Mixed	4.4%	2.3%	1.7%	3%
Other	3.4%	2.7%	2.5%	4%
White	68.4%	81.7%	82.1%	73%
(blank)			0.2%	0%

Disability

	Staff with research-only contracts	Staff with academic (teaching and research contracts)	Staff with reviewed outputs	Staff marked eligible in Pure
Information Refused/Not Known	2.5%	3.5%	2.7%	3%
No known disability	94.8%	94.0%	94.5%	94%
One or more disabilities	2.7%	2.6%	2.5%	2%
(blank)			0.2%	0%

Age

	Staff with research-only contracts	Staff with academic (teaching and research contracts)	Staff with reviewed outputs	Staff marked eligible in Pure
21 - 25	0.5%	0.1%	0.0%	0%
26 - 30	11.3%	0.6%	0.7%	7%
31 - 35	36.5%	8.9%	9.4%	18%
36 - 40	23.5%	16.5%	18.0%	19%
41 - 45	10.6%	15.8%	17.2%	14%
46 - 50	4.0%	13.5%	14.8%	12%
51 - 55	6.4%	17.4%	15.8%	12%
56 - 60	3.0%	12.8%	11.0%	10%
61 - 65	2.4%	8.7%	8.1%	4%
66 and over	1.8%	5.7%	4.9%	3%
(blank)			0.2%	0%

Scoring Data

4476 outputs had been reviewed and received a predicted score. The table below shows the number of outputs predicted to receive each score:

Predicted 4*	Predicted 3*	Predicted 2*	Predicted 1*	Predicted u/c
1201	2323	807	72	73

The tables below show the percentage of staff with predicted scores:

Sex	**Predicted 4***	**Predicted 3***	**Predicted 2***	**Predicted 1***	**Predicted u/c**
Female	37.8%	37.5%	35.1%	46.3%	25.0%
Male	61.8%	62.3%	64.7%	53.7%	75.0%
#N/A	0.4%	0.3%	0.2%	0.0%	0.0%
Ethnicity	**Predicted 4***	**Predicted 3***	**Predicted 2***	**Predicted 1***	**Predicted u/c**
Asian	4.8%	5.8%	4.3%	7.5%	8.3%
Black	0.8%	0.7%	1.1%	0.0%	0.0%
Chinese	3.2%	2.8%	3.4%	0.0%	1.7%
Information Refused/ Not Known	4.8%	4.0%	4.9%	6.0%	3.3%
Mixed	1.3%	1.8%	1.5%	0.0%	0.0%
Other	2.5%	2.6%	1.7%	1.5%	1.7%
White	82.2%	82.1%	83.0%	85.1%	85.0%
#N/A	0.4%	0.3%	0.2%	0.0%	0.0%
Disability	**Predicted 4***	**Predicted 3***	**Predicted 2***	**Predicted 1***	**Predicted u/c**
Information Refused/Not Known	1.9%	2.7%	2.6%	4.5%	0.0%
No known disability	95.9%	94.5%	94.2%	91.0%	98.3%
One or more disabilities	1.9%	2.6%	3.0%	4.5%	1.7%
#N/A	0.4%	0.3%	0.2%	0.0%	0.0%
Age	**Predicted 4***	**Predicted 3***	**Predicted 2***	**Predicted 1***	**Predicted u/c**
26 - 30	0.4%	0.6%	0.7%	0.0%	0.0%

31 - 35	8.9%	8.8%	7.6%	11.9%	5.0%
36 - 40	16.0%	18.3%	17.5%	11.9%	10.0%
41 - 45	17.4%	17.0%	18.3%	19.4%	16.7%
46 - 50	16.0%	14.6%	14.2%	16.4%	30.0%
51 - 55	16.1%	16.3%	16.4%	17.9%	11.7%
56 - 60	11.5%	11.3%	11.2%	7.5%	13.3%
61 - 65	8.1%	8.0%	9.1%	9.0%	6.7%
66 and over	5.2%	4.8%	4.7%	6.0%	6.7%
#N/A	0.4%	0.3%	0.2%	0.0%	0.0%

Count of staff marked "Eligible" in Pure with predicted grades

Sex	4*	3*	2*	1*	u/c
Female	50	71	28	6	1
Male	74	116	62	5	8
Ethnicity					
Asian	8	15	7	2	3
Black	2	2	2	0	0
Chinese	4	8	4	0	1
Information Refused/Not Known	5	6	4	2	0
Mixed	2	3	2	0	0
Other	3	7	2	0	0
White	100	146	69	7	5
Disability					
Information Refused/Not Known	3	5	3	2	0
No known disability	120	178	87	9	9
One or more disabilities	1	4	0	0	0
Age					
26 - 30	0	1	0	0	0
31 - 35	14	23	9	3	0
36 - 40	13	26	8	1	1
41 - 45	27	35	14	1	0

46 - 50	21	30	16	3	3
51 - 55	17	28	15	2	2
56 - 60	15	23	13	0	1
61 - 65	8	13	9	0	2
66 and over	9	8	6	1	0

APPENDIX 2: Guiding principles on the REF preparation process

The full process for preparing the College's submission is provided above, but the following are basic principles that apply to the process as a whole:
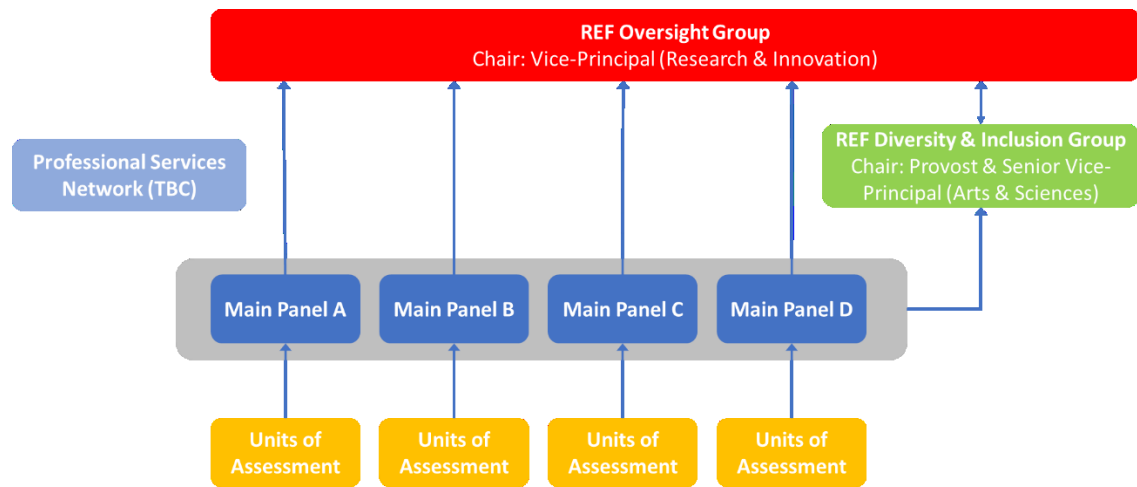
<u>Staff</u>

* As a research-intensive university, the College aims to submit all staff that are eligible under the criteria for staff submission established by Research England.

* Staff who are not eligible for submission will be informed initially by their Faculty on an informal basis at an early stage, with reasons given. This could be carried out as part of normal appraisal and performance management processes.

* All Category A eligible staff will have their eligibility status confirmed in writing. This decision will, apart from in exceptional circumstances, be communicated to staff by the end of September 2020.

*The ability to appeal will be offered to all staff who are identified by the College as not eligible for submission where they believe they should be considered as such.

* Final decisions about eligibility will not be taken into account in relation to any promotion, progression or extension of contract process.

<u>Outputs</u>

* Staff will be requested to provide an initial selection of outputs. Following internal review, the College will select outputs based on optimising the overall quality of the submission.

* Staff may be submitted without the minimum of one output where they voluntarily disclose any applicable circumstances that have adversely affected their ability to undertake research for more than 46 months during the REF period. The process of voluntary disclosure will be done with discretion and confidentiality.

* The number of an individual staff member's outputs included in the REF submission will not be taken into account in relation to any promotion, progression or extension of contract process. Equally, grades and comments generated through the College's internal review process as part of preparation for REF submission will not be used directly to determine the outcomes of any formal Personal Development Review (PDR) process. Some Faculties have decided to share the (anonymised) reviews with staff members for informal personal review purposes.

* The King's EDAP will receive regular updates from each Main Panel area on how they are applying the framework outlined in the Code of Practice.

APPENDIX 3: Structures and Governance

REF Oversight Group
Chair: Vice-Principal (Research & Innovation)

Professional Services
Network (TBC)

REF Diversity & Inclusion Group
Chair: Provost & Senior Vice-
Principal (Arts & Sciences)

Main Panel A   Main Panel B   Main Panel C   Main Panel D

Units of
Assessment

Units of
Assessment

Units of
Assessment

Units of
Assessment

APPENDIX 4: Constitution and Terms of Reference of the REF oversight Group

The REF Oversight Group is responsible for ensuring that King's is on track for a high-quality REF submission that reflects the achievements of our research staff, and that decisions being made enable the best possible outcome for all faculties across the university.

Terms of reference

1. To have strategic oversight of the university's submission to the Research Excellence Framework.
2. To receive regular reports from the main panel groups and the (forthcoming) Impact Taskforce regarding the progress made towards the development of the submission.
3. To ensure that progress is made and deadlines are met in accordance with the university strategy and REF timetable.
4. To receive advice on and oversee arrangements for ensuring that matters relating to diversity and inclusion are fully implemented and monitored.

Group meetings are chaired by Reza Razavi (Vice President & Vice-Principal (Research & Innovation)) and consists of panel leads, RMID representatives, and other senior staff members with significant responsibility for the university's REF strategy. Meetings currently occur on a quarterly basis though these may become more frequent as the final submission deadline approaches

.

REF Oversight Group members

- Vice-Principal (Research) – Professor Reza Razavi - *Chair*
- Senior Vice President (Arts and Sciences) – Professor Evelyn Welch
- Senior Vice President (Health) – Professor Sir Robert Lechler
- Senior Vice President (Quality, Strategy and Innovation) – Professor Chris Mottershead
- Chairs of the four Main Panel Co-ordination Groups:
  - Panel A – Professor Mike Curtis
  - Panel B – Professor David Richards
  - Panel C – Professor Frans Berkhout
  - Panel D – Professor Paul Readman (2015-2018); Professor Patrick Ffrench (2018-present)
- Chair of the University Impact Committee – Professor Mike Goodman
- REF Delivery Director – Jo Lakey
- Research Management and Innovation Directorate – Martin Kirk
- Director of Research Strategy and Development – Tom Foulkes
- Director of Research Strategy Delivery – Cat Mora
- Director of Diversity and Inclusion – Sarah Guerra
- Secretariat – REF Policy Officer

APPENDIX 5: Constitution and Terms of Reference of the King's EDAP, Applicable Circumstances Subpanel, and Appeals Subpanel

The REF is governed by three guiding principles: equity, equality and transparency, to ensure that all submitted research is assessed on a fair and equal basis, that equality and diversity is embedded in HEIs and that decision making is clear and consistent.

At King's College London, equality, diversity and inclusion lie at the heart of everything we do. The College is committed to creating an inclusive environment that promotes equality of opportunity for everyone in its community.

The King's Equality & Diversity Advisory Panel (EDAP) has been established by the VP Research to ensure that the operational aspects of preparing for REF2021 are fully informed by the principles of Equality, Diversity & Inclusion, including monitoring and reporting on our adherence to our own code of practice on staff and output selection.

Each King's EDAP member will also have a role in one of two subpanels. One subpanel will be the Applicable Circumstances Review Panel, who will assess confidential staff circumstances, recommending appropriate reductions in outputs to King's REF Oversight Group and to the Research England REF EDAP. The second subpanel will adjudicate on formal staff appeals to decisions made on eligibility and applicable circumstances.

Function:

The Panel will perform the following functions:

1. Act as the first line of consultation for actions or decisions surrounding King's REF2021 submission which have a potential for impact on ED&I or that might otherwise benefit from scrutiny from an ED&I perspective.

2. Take decisions on ED&I-related matters where assigned from the REF Oversight Group.

3. Advise the College Research Committee, REF Support Team and Unit of Assessment leads on general issues relating to equality and diversity aspects relating to the REF.

4. Advise on the provision of training to staff involved in decisions about the submission of staff and outputs.

5. Monitor the take-up of mandatory diversity training for all those involved in decisions about the submission of staff and outputs.

6. Provide feedback and recommendations for the development and performance of Equality Impact Assessments (EIAs) and King's wider Code of Practice for REF2021.

7. Provide support and coaching for D&I champions within the four REF main panel meetings, who can feed back any queries or points of discussion that arose in panel meetings to the Panel.

8. Provide regular reports to Academic Board on ED&I matters in relation to the REF at King's and a final report following submission in 2020.

9. Any other function where authority on ED&I matters in relation to the REF at King's is required.

King's EDAP: Applicable circumstances review subpanel (TOR)

The Panel will confidentially review staff disclosure forms relating to applicable staff circumstances and make recommendations to the REF Oversight Group for each case on whether a reduction of output volume should be applied to the individual or submitting unit in line with Research England guidelines. It will oversee the process for submission to the REF EDAP, ensuring that robust cases are prepared in line with REF2021 guidance.

King's EDAP: Appeals subpanel (TOR)

The Appeals Subpanel is responsible directly to the Principal. Their role is to hear and adjudicate on appeals from academic staff with regard to the REF processes.

Appeals will be heard by no fewer than three senior members of the College academic staff. The Chair nominated will be a senior member of the College academic staff, approved by the Principal of the College, and will not been involved in the process leading to the appeal. They will normally be the Vice Dean (Research) from a Faculty other than the one from which the appeal has come.

A member of staff from Professional Services, not party to the original process leading to the appeal, will provide secretarial support to the Panel.

King's EDAP: Membership

- Provost & Senior Vice President (Arts & Sciences), also a member of the REF Oversight Group – **Chair**
- REF Delivery Director – **Secretary**
- Director of Diversity & Inclusion
- Academic D&I leads each of the faculties

King's EDAP: Non-member meeting attendees

- Staff network/community chairs or appointed deputies, with a preference for academic staff:
  - LGBT+ staff network
  - Athena Swan network
  - Staff disability network
  - BME mentor network
  - Parent and carer's network
  - Early career research staff

Applicable Circumstances Review Subpanel: Membership

- Two senior academics from Health and Arts & Sciences - **Co-Chairs**
- REF Delivery Director – **Secretary**
- Director of Diversity & Inclusion
- Up to half of the academic membership of King's EDAP
- Occupational Health staff member

Appeals Subpanel: Membership

- Vice-Deans (Research) for a faculty that is not involved in the appeal case – **Co-Chair**
- The Secretary will be a member of King's staff who have not been involved in any of the decision-making processes for the King's submission. This role has yet to be appointed.
- At least two members of King's EDAP who have not been involved in the Applicable Circumstances Review Subpanel

Decisions made by the King's EDAP and its subpanels will be independent of the decision-making process for staff and output selection. Members of King's EDAP and the subpanels will be asked to declare any potential conflicts of interest for any item of discussion, following which they will be excused from the decision-making process for that particular item.

Frequency of meetings:

King's EDAP meetings will be held no fewer than three times per academic year (or as regularly as needed). Circumstance review meetings will be held on four occasions between 2019-2020 (specific dates listed will be listed on the intranet).

Where a major decision concerning King's REF submission requires reflection from an ED&I perspective and a regular meeting is not scheduled in the coming few weeks, the committee may be called to meet on an ad hoc basis.

Governance & reporting:

The King's EDAP will report directly to the REF Oversight Group. Decisions and recommendations arising from the committee will be reported as a standing item on the REF Oversight Group meeting agenda.

Discussions from the circumstances review sessions will remain confidential outside of top-level numbers of cases raised and outcomes.

1   Overview

This document sets out the main decisions and processes around which our REF 2021 Code of Practice will be based. The Code of Practice must be submitted to Research England by June 2019.

REF 2021 differs from previous research assessment exercises in several key areas (including eligibility, decoupling individual from outputs), meaning that aspects of our approach will be fundamentally different to previous rounds.

The first two guiding principles behind King's Vision 2029 are to:
- Be an exceptional institution in all that we do
- Create an inclusive environment where all individuals are valued and able to succeed

We will meet both principles in our REF code of practice by including all academic staff who have significant responsibility for research, and by ensuring that we demonstrate exceptional achievement through the selection of our very best outputs and impact case studies. All our actions will be underpinned by transparency, consistency, accountability, and inclusivity.

This will be a two-stage process, first identifying eligible staff and then selecting outputs.

2   Staff eligibility

REF 2021 works on the starting principle that all eligible staff should be submitted, differing from
previous approaches. REF 2021 Eligibility Guidance is driven by two concepts, both of which must be satisfied for inclusion:
- Independent research
- Significant responsibility for research

These will be assessed independently of outputs (i.e. an individual's performance bears no relationship to their eligibility for inclusion).

Based on the two criteria, we will submit staff in the following categories:
1. Academic staff on "research and teaching" contracts
2. Staff on research-only contracts who hold an independent research fellowship (see https://www.ref.ac.uk/guidance/: 'List of independent research fellowships')
3. Staff on research-only contracts whose roles carry an expectation of independent research and who have been allocated the time and resources to undertake independent research

Note that eligibility of staff on fixed-term contracts will be assessed in the same way as those on open-ended/permanent contracts. Staff on the Academic Education Pathway would not normally be considered eligible.

Category 3 Inclusion: The line-managers of staff in Category 3 are asked to make the case for their submission, outlining the expectation of independent research and the time and resources that the staff member has been allocated. This should be addressed to the respective Main Panel lead using the *Category 3 Inclusion Template (to follow).*

Main panel leads will make recommendations on whether or not Category 3 staff members have significant responsibility for research to the REF Oversight Group, which will agree the final decision. Staff members and Line Managers who submit templates will be informed about the outcome in writing.

3 Applicable Circumstances

Distinct from assessment of eligibility, King's can request adjustments for staff who are considered to have applicable circumstances. Further guidance on this is expected from Research England, but circumstances are likely to include parental/carer leave, secondments, disability, ill health and potentially early-career status. Identification of an individual as having applicable circumstances is expected to result in (1) reduction in the overall number of outputs required for the Unit of Assessment, and (2) potential reduction in the requirement for a minimum of one output per individual.

Staff will be invited to submit the *Applicable Circumstances Template (to follow)*, indicating if they wish their circumstances to remain confidential. These templates will be assessed by the Equality & Diversity panel and recommendations for reduction in outputs will be sent to the REF Oversight Group.

4 Selecting outputs

Number of outputs: Each Unit of Assessment is required to submit 2.5 outputs per FTE overall, with a minimum of one output and maximum of 5 for each individual. The outputs can include publications from staff who have left since January 2014. Units may be able to apply for a reduction in the number of outputs returned, and individual staff may also, in exceptional circumstances, be returned without an output (see above).

Assessment of outputs: The outputs selected and submitted to REF will be designed to optimise the overall GPA of the University's submission. This will be achieved using a modelling approach close to submission.

REF UOA and Main Panel leads will ensure that outputs proposed for submission have been assessed for originality, significance and rigour. Assessments may be done using internal and external expertise. All outputs which are proposed for the final submission must have been read by at least two reviewers. All those involved in selection will also be expected to adhere to our commitment to DORA when using features such as citations to determine quality or to choose between outputs.

In 2019, The College will undertake a 'dip-stick' assessment designed to calibrate these assessments. This exercise will be used to assure our ability to select the highest quality outputs in order to optimise our submission. Staff will be informed of the final choice of output to be submitted to REF in writing by September 2020.

5 Impact Case Studies

Impact case studies will be identified, developed and assessed in a process led by Main Panel and individual UOA leads. Potential case studies will be assessed and selected based purely on optimising the overall King's REF outcome.

6 Equality, Diversity & Inclusion

The REF team is aware that there may be elements of conscious and/or unconscious bias when undertaking research assessments. To ensure inclusivity and fairness, the following actions will be taken:

Oversight: The King's Director of Diversity & Inclusion is a formal member of the REF Oversight Group, and is responsible for (1) providing expert advice and (2) ensuring that the Group holds itself to the highest standards in this respect. The REF Equality & Diversity Group will lead on the design and monitoring of REF processes.

Training: All King's staff involved in REF selection of outputs will attend the KCL 'Diversity Matters' training before making the final output selection.

Equality Impact Assessments: A review of REF2014 at King's indicated that there was no statistical difference in the submission of men or women but that there was a lower level of submission for BME staff. Throughout the REF process, King's will undertake regular EIAs in order to monitor the impact of REF selection on all protected characteristics. Where issues emerge (i.e. if higher numbers of outputs are selected from one group than from another), the REF Equality & Diversity group will investigate to ensure that there has been no bias, conscious or unconscious, in the selection process.

7   Policy on REF submission decisions and use of data collected for REF

Final decisions on submission of outputs and impact case studies will not be used for any other process at King's (e.g. PDRs).

Data generated as part of the REF process – for example peer-reviewed assessment of output quality – may be used by some Faculties to inform other processes, such as feeding into a broader set of data for PDR. This will be made clear by each Faculty.

8   Structures and Governance