

Annex A

Consultation questions and response form

1. Responses to the consultation should be made by completing the form below, and returning it by e-mail by **midday on Wednesday 16 December 2009**.
2. All responses should be e-mailed to ref@hefce.ac.uk. **In addition:**
 - a. Responses from institutions in Scotland should be **copied to** Pauline Jones, Scottish Funding Council, e-mail pjones@sfc.ac.uk.
 - b. Responses from institutions in Wales should be **copied to** Linda Tiller, Higher Education Funding Council for Wales, e-mail linda.tiller@hefcw.ac.uk.
 - c. Responses from institutions in Northern Ireland should be **copied to** the Department for Employment and Learning, e-mail research.branch@delni.gov.uk.
3. We will publish an analysis of responses to the consultation. Additionally, all responses may be disclosed on request, under the terms of the Freedom of Information Act. The Act gives a public right of access to any information held by a public authority, in this case HEFCE. This includes information provided in response to a consultation. We have a responsibility to decide whether any responses, including information about your identity, should be made public or treated as confidential. We can refuse to disclose information only in exceptional circumstances. This means responses to this consultation are unlikely to be treated as confidential except in very particular circumstances. Further information about the Act is available at www.informationcommissioner.gov.uk. Equivalent legislation exists in Scotland.

Respondent's details

Are you responding:	On behalf of an organisation
Name of responding organisation/individual	Society for General Microbiology
Type of organisation	Learned society
Contact name	Dr. Ron Fraser
Position within organisation	Chief Executive
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Consultation questions

(Boxes for responses can be expanded to the desired length.)

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

Members of the Society for General Microbiology welcome many of the key features of the REF. The principle of assessing and rewarding research excellence is correct. Assessing coherent academic groupings is appropriate to identify and encourage excellence.

While measuring impact is desirable, there are concerns that the weighting of 25% is too high as this is a brand-new parameter. Criteria, metrics and methods for assessing impact will need to be further defined and rigorously tested before such a high percentage can be allocated. The time-frame over which impact will be measured and how evidence of impact can be assessed objectively are also of concern. Results from the pilot exercise will be essential to inform decisions.

The use of citation information is appropriate and useful in bringing a greater degree of objectivity to assessment. However, the time-bound nature of this information may provide significant limitations.

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

Comments are especially welcomed on the following proposals:

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

and on the following options:

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

SGM members broadly agree with the first three proposals in this section. Providing evidence for quality research combining many science disciplines should be encouraged as this reflects modern research. Panel criteria defining the research staff and outputs that may be submitted by HEIs needs to be clearer. More detailed definitions of the four starred outputs from sub-panels are also needed.

Using citation information to inform assessment is generally supported and thought to be useful as it will allow a greater degree of objectivity in assessment, and will support the essential role of expert peer review. There are concerns that its dependency on time will make it extremely difficult to compare recent publications to earlier ones. There are also additional hazards in using

citation information as a marker of excellence, for example, when papers are cited to highlight their flaws.

SGM members are divided equally on their preference for a maximum of three or four outputs submitted for each researcher. It is suggested that perhaps early-career researchers should be assessed on fewer outputs to incentivise them.

There is disagreement with attaching a 'double weighting' to some types of output as there are likely to be problems in defining the criteria for these.

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

Comments are especially welcomed on the following:

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

Assessing impact is commendable, however the timescale, type of impact, methods and metrics all need to be carefully considered. The results from the pilot exercise will be essential for this.

The proposed time-lag of 10-15 years between publication and impact of research may be problematic. Impact will be assessed for an institution, yet is determined by individuals within that institution. There may be considerable movement of staff between institutions and retirement within the proposed period and it is unclear who will get the benefit of the recent impact of their work. This issue is not dealt with satisfactorily in the document and raises concern with the 25% attributed to this parameter.

The criteria for measuring impact need to be more detailed and better defined, particularly as it is a new parameter to be assessed. The definitions of each of the four starred levels need to be clearer. There are concerns that it will be difficult to assess impact objectively. Certain 'esteem markers' should be kept, including editorship and grant review committee membership to reduce emphasis on publication outputs and to increase objectivity.

It is suggested that both main panel members and user members on panels should be fully involved in assessing all aspects (outputs, environment and impact) rather than each group focussing on different aspects, as implied by paragraph 71. The status and role of associate members is very unclear, as is the distinction between associate members and specialists.

Research users should be defined in a broad way to include the NHS and the commissioners of research, such as the Wellcome Trust.

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

Assessing research environment should certainly be encouraged, but is necessarily subjective. It is suggested that data such as number of PhD students and number of programme grants be used as additional objective markers for environment quality.

It is also suggested that information on environment and impact be requested in a standardised format rather than a narrative form. This will reduce variation in the type and quality of information that is provided, thus making fair assessment easier.

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

SGM members agree that it is dangerous to allocate such a heavy weighting to impact as it is a new, untested parameter. It is therefore suggested that the weighting for impact should initially be reduced to 15%, combined with an increased weighting for output. Following implementation of the REF at a time when difficulties associated with measuring impact have been overcome, the weighting for impact could be increased.

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

As there will be fewer panels to cover a broader range of subjects, there are concerns that the increased workload will lead to a lack of consistency in assessments.

Clearer criteria are welcomed to determine which UOA is the most appropriate for broader research subjects where it is ambiguous. For example, microbiology research may be categorised under either Clinical Medicine or Public Health.

It is suggested that the biological component of Earth Systems and Environmental Sciences fits better in UOAs Biological sciences and Agriculture. As there is little linkage between biological and non-biological aspects of environmental sciences, assessment of each aspect alongside similar research topics would lead to greater consistency.

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

Criteria, particularly short statements describing outputs, must be much more clearly defined. This was a source of confusion and inconsistency in RAE 2008 and needs to be rectified.

Requesting information in a more standardised format as described in Q4 will help ensure consistency between panels. There are concerns that fewer panels will hinder consistency, as described in Q6.

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

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

Research at the interface of two distinct disciplines is desirable and increasingly 'the norm' for many subjects including biology. Interdisciplinary research outputs should be identified at an early stage to allow them to be reviewed by two sub-panels.

The RAE 2008 system of providing a statement to justify a lack of primary author status on interdisciplinary research publications should be continued. This will allow appropriate credit to be given to 'middle authors' from different disciplines.

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

Staff seconded to industry should not be allowed to submit fewer outputs, as any decrease in output quality should be matched by an increase in impact.

It should also not be assumed that researcher mobility increases research excellence.

Some researchers are not mobile either by choice or because their research does not benefit from it and in these cases the REF proposals are unlikely to have much of an effect.

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

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

Additional time should be given in autumn 2010 for the outcome of the pilot exercise to be thoroughly considered. It would therefore be appropriate to relax the timetable by 6-12 months to allow for this.

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

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

Consideration should be given to the high workload of the sub-panel. Such a broad range of subjects within each sub-panel may mean there is a lack of expert knowledge for each of the specialities within it. This means that assigning a star-rating to research outputs cannot be done with any authority. The high workload may be exacerbated if the number of academic scientists is reduced to make way for those who can assess impact.