

Information on respondent

Name	Ceri Bain (REF Manager)
Respondent type (delete as appropriate)	Higher education institution
Institution (where relevant)	Edinburgh Napier University

At Edinburgh Napier University, we broadly welcome the changes to the new PCE component of the submission, both in terms of widening the scope and increasing the weighting. We are pleased that there is an intention to increase focus on the assessment of the conditions that are an essential feature of research excellence and welcome the introduction of a tighter structure to the statement, drawing on appropriate evidence indicators.

Our main concerns relate to the practical implications of the changes as stated below, and as we recently communicated to the REF Manager via the Scottish REF Managers Group:

The Suite of Metrics, Interpretation of Metrics, and Timings

Whilst we very much welcome the development of a suite of suggested metrics by which to evidence a thriving people, culture environment component, we have concerns about the timeframe for receiving this information and the resultant burden and lack of robustness in the quantitative data we can collect before submission date.

The proposed timeframes are likely to result in partial (potentially meaningless) data sets for REF 2028. The exercise needs to recognise that capacity / expertise to support new data generation varies greatly across different institutions and HEIs should not be penalised for this.

We also recognise that there is a conflict between having REF guidance on metrics that provides the sector with rigorous, clearly defined and consistent criteria to report upon; whilst on the other hand, empowering institutions to measure outcomes through self-defined indicators which best reflect their own strategic context and story of success.

It is important that institutions have clarity on which elements are discretionary and which are compulsory and furthermore, to what degree of discretion can an institution decide the appropriate granularity of data being reported. This is relevant for smaller units where it might make sense to report metrics at a School or clustered-disciplinary level. Institutions should be empowered to decide this level of detail and be confident that it will be assessed fairly and favourably.

Being mandated to report certain metrics at a UoA and Institutional level could be heavily burdensome or result in meaningless data (e.g. EDI in small samples). Small samples might also have a risk of revealing identifiable personal information.

Furthermore, we feel it is unhelpful to use measures such as membership/ signatory of e.g. Concordats or sector-wide initiatives as proxies of success. Instead, we encourage assessment to focus on the institutions' own context, ambitions, journey and outcomes, rather than the volume of initiatives to which they have signed.

The way in which quantitative data is presented to the panel requires careful consideration in this exercise to ensure that metrics are evaluated within the context specific to the institution. Rankings / lists are likely to result in unhelpful and unrepresentative comparisons which feels at odds with creating a culture of collaboration rather than competition within the sector. The

responsible use of metrics should be a key principle not only for submitting institutions, but equally, for panel assessors.

Institution-Specific Strategy – Assessing Narrative and Qualitative Evidence

From the information on REF2028 available to date, we have interpreted PCE assessment as being contextual, i.e. measuring the progress we have made within the research culture space over the assessment period, in accordance with our own strategies and resources available.

This approach now means that it is more difficult to ‘compare’ institutions, because the strategic initiatives and the evidence of progress needs to be considered within the context of the submitting institution.

As such, it is important that the assessment process meaningfully evaluates and rewards the qualitative evidence and the contextual narrative to form a rounded view, alongside the relevant metrics.

More information on how panels will be trained to approach this and how they will distinguish between the quality thresholds would be helpful.

Panel capability / expertise / representation

We have concerns about how well-equipped the sub-panel members will be to expertly and confidently assess the PCE component. The PCE statement is likely to be complex to assess because of the newness of the component as well as a need for assessors to meaningfully understand the unique context of each submitting institution. The expertise required to accurately assess research outputs is different from that required to assess PCE elements.

It might be appropriate to consider different panel compositions and expertise for different elements of the REF submission, with specific panel assessors appointed to PCE component based on their knowledge and demonstrable understanding of people and culture in research. These panel members should span different functions, different career stage and different institutional types.

Solutions - We recommend the following:

- The suite of suggested metrics should be co-developed in association with the REF community, recognising differences in data collection / systems amongst the devolved nations. The REF team needs to carefully balance a meaningful sector consultation with the urgency of confirming this information asap and recognise that the timeframes are likely to result in partial (potentially meaningless) data sets for REF 2028.
- All quantitative data should be accompanied by a contextual narrative and should not be presented to the panel in isolation or in the format of rankings.
- Panels should be required to read comprehensive briefing packs and demonstrate understanding of DORA and the differences between types of institution, the devolved nations, funding models, legislation etc. before commencing any PCE assessment.
- Panel membership should be widened to include advisors with expertise in People and Culture initiatives. **END**