**Research Excellence Framework 2028: issues for further consultation following initial decisions**

The four UK higher education funding bodies (Research England, SFC, HEFCW and DfE NI) are publishing key decisions on the high-level design of the next research assessment exercise and outlining issues for further consultation. These decisions represent a shift towards a broader and more holistic approach to research assessment.

This survey is hosted by Research England (part of UKRI) on behalf of the four UK funding bodies. The survey is available to download below as PDF (in both English and Welsh).

Please only respond to the consultation using the survey. See the full initial decisions document, annexes and supporting documents: <https://www.jisc.ac.uk/future-research-assessment-programme/initial-decisions>.

Following the publication of these initial decisions, further work is required to develop the more detailed guidance and criteria. This survey is asking for your input on specific policy aspects. Please see Annex A of the initial decisions document for details.

**[Questions 1 - 5 are regarding institutional contact information]**

**Volume Measure**

The funding bodies propose to draw staff data directly from HESA to calculate the volume measure, using an average staff FTE over Academic Years (AYs) 25/26 and 26/27 (piloted in AY 24/25) (Annex A, paragraphs 4-7).

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| **5. What practical challenges may institutions face in implementing these changes?** |
| * Establishing the final volume quotas so close to the submission date will be difficult, particularly if there is significant change in SIGRES volume immediately before the July 2027 HESA census date.
* Institutions may need to unnecessarily prepare additional case studies / outputs in case of late threshold changes.
* Game-playing remains a risk when using HESA data for UoA alignment, whereby institutions could strategically align volume-contributing staff to an artificial UoA alignment to achieve their preferred thresholds. However, we feel strongly that institutions should continue to be allowed to complete the UoA alignment field, rather than being auto-mapped by cost centre activity, which is unrepresentative of research activity.
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| **6. How might the funding bodies mitigate against these challenges?** |
| * We welcome the use of an average FTE over a period, but suggest this be deferred to REF 2034, when the process can be embedded and spread over a longer, more representative census period.
* Preferably, we suggest a one-year HESA census date of 31 July 2026, with the rationale being that, most institutions would have broadly steady employment of volume-contributing staff in the following year. This would allow institutions to confirm final quotas well in advance of submission whilst remaining broadly reflective of their average population.
* If the two-year average is retained, then the period 2024-25 and 2025-26 would be preferable, to allow institutions to confirm final quotas well in advance of submission.
* If using 2025-26 and 2026-27 data, we request that funding bodies provide clear guidance on how and when the HESA data average will be calculated and ensure a fixed date by which to know the absolute volume measures. Guidance on the rules for amendments to the submitted HESA data would also be appreciated early.
* The audit process needs to be robust and consistent to identify and remedy game-playing (such as significant misalignment of UoAs or unusual contract changes).
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| **7. What would be the impact of these challenges on individual researchers and particularly those with protected characteristics or other underrepresented groups?** |
| * If an institutions’ REF 2028 Code of Practice is transparent and fair, and effective appeal processes are in place, the use of HESA data as opposed to a submitted list should have little effect.
* There is a risk that institutions artificially categorise staff as SIGRES or NON SIGRES for strategic reasons (e.g. to remain within volume thresholds) meaning that staff are disadvantaged in their opportunity to become SIGRES, but this was also a risk in REF 2021. It is therefore important that the Code of Practice, appeal process and audit process is robust.
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**Output Submission**

The funding bodies propose to fully break the link between individual staff members and unit submissions (Annex A, paragraphs 12-18).

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| **8. What would be the impact of these changes on individual researchers and particularly those with protected characteristics or other underrepresented groups?** |
| * There is a risk that Staff with lower quality research outputs may be underrepresented in the submission and thus unable to demonstrate contribution to REF in their future career development, particularly with the removal of the minimum one.
* There is a risk that prolific staff (maybe senior staff) may become 'responsible' for bridging the gap in outputs required. It may result in unacceptable / unrealistic expectations on these staff.
* There is a risk that Early Career staff or those ‘developing’ in research may be disadvantaged in their allocation of research time/ resources to allow prolific staff known to produce high-quality outputs to produce more, with a greater allocation of time afforded to them to do so.
* Allowing the submission of outputs produced by colleagues who are not significantly responsible for research might open an opportunity for game-playing, as HESA status could be changed to NON SIGRES, with their outputs still being taken into account.
* There is a need to avoid unrealistic expectations being put on non-academics, RAs, Professional service staff, or staff on teaching-only contracts to start producing research outputs but without affording them proper time and support to do so. It could drive a narrative that teaching is less important than research.
* Alternatively, it could drive positive change by encouraging institutions to extend their researcher development opportunities and training programmes to a broader body of staff who have ambitions to become involved in research.
* It is therefore important that the Code of Practice, appeal process and audit process is robust and that the ‘People, Culture and Environment’ component recognises and rewards a culture of inclusivity and transparency.
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| **9. What impact would these changes have on institutions in preparing output submissions? For example, what may be the unintended consequences of allowing the submission of outputs produced by those on non-academic or teaching-only contracts?** |
| * Practically, it increases the associated administrative workload in terms of preparation due to an increased pool of eligible outputs to assess. e.g., identifying, scoring and selecting outputs.
* There are practical issues associated with identifying all the eligible outputs if they are not routinely added to research management systems. This could disadvantage those staff who are less familiar with the process / system (e.g. non academics). This could also result in additional administration, with a need to upskill and train staff to use institutional repositories.
* There could be additional workload associated with checking open access compliance for outputs which have not been routinely added to green route repositories.
* Time and care will be needed to agree appropriate output selection criteria. This could require substantive changes to existing Codes of Practice, requiring lengthy consultation. There also needs to be reassurance from REF that there will be a benefit, in real terms, for submitting 1 and 2\* outputs, in place of 3 and 4\* outputs, to ensure inclusivity.
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| **10. Should outputs sole-authored by postgraduate research students be eligible for submission? If so, should this include PhD theses?** |
| Where appropriate, outputs from sole-authored postgraduate research students could be eligible for REF submission. However, submission of PhD theses **should not** be part of the REF exercise for the following reasons:1. Including PhD theses in the REF submission, risks a two tiered scoring process. Theses is already scored against a framework as part of the examination process, the Viva. For it then to be scored more or less favourably by the criteria set out by REF could put the institution in disrepute and negate the examination process (PhD viva) as the benchmark of PhD quality. This could also have a negative effect for an individuals’ career progression.
2. Adding the burden of REF submission to PhD theses would be undesirable for both staff and students in terms of additional pressure and workload.
3. The workload not only for the submitting institutions but also the panels is vast, given the length of each document.
4. There is also a reputational risk to universities (e.g. recruitment of PhD students) who do not score well or if scores of theses are less than the viva examination.
5. There is a risk that this approachwould disadvantage less research-oriented Universities with limited opportunities to fund and attract PhD students. Not least because it reinforces the bigger funded institutions who have a stronger pool of Phd students already.
* If sole-authored outputs (excluding theses) are eligible for submission, this could have positive impacts for a student in terms of demonstrating success and achievement. However, it is imperative that institutions develop very clear and transparent guidance if this approach is implemented, which could require significant updates to existing research degree policies and a lengthy period of consultation.
* Alternatively, it could lead to poor supervisory practices, pushing PhD students to sole-author when they should be encouraged to focus on a positive research degree experience, with an engaged and experienced supervisory team (e.g. co-authoring and mentoring).
* Wider contributions of PhD students should be recognised and rewarded in the new People, Culture and Environment statement.
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| **11. What would be appropriate indicators of a demonstrable and substantive link of the submitting institution?** |
| * We broadly agree with the proposal to tie ‘substantive link’ to a period of employment at the institution, however, there needs to be some consideration of the timing of the employment and the timing of publications.
* Agreeing the contract length (proposal for 6 months at 0.2FTE in post) requires a clear rationale, informed by sector data to determine if this is an appropriate length of time to reflect a demonstrable contribution to the institution. Allowing submissions from people employed 0.2 FTE for just 6 months could encourage transfer markets and buying-in staff on short-term contracts to contribute papers generated at previous institution.

**Alternative or additional indicators should also be considered such as:**Institutional attribution / affiliation on outputsDemonstrable record of co-publishing with submitting institution, previously Visiting professors/emeritus profs on honorary appointments.Involvement in supervisory teamsLine management of staffContribution to UoA activities (academic committees etc).  |

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| **12. Do the proposed arrangements for co-authored outputs strike the right balance between supporting collaboration and ensuring that assessment focuses on the work of the unit?** |
| * We are unable to fully answer this question because there is insufficient detail on the proposed arrangements.
* It is unclear if only co-authored outputs can be submitted in multiple UoAs? Or if any outputs which fit multiple descriptors can be submitted to multiple UoAs.
* It might be considered unethical to count a single author's output multiple times in multiple UoAs and could lead to game-playing whereby institutions submit the same output in multiple UoAs due to the broad and fluid nature of some UoA descriptors (particularly in Panel D).
* However, if an output is truly multi-disciplinary, it should be recognised and rewarded across the disciplines. Fair and consistent assessment of the ‘representativeness’ statement will be pivotal here, whereby *'units will be required to explain how their submitted output pool is representative of the research undertaken within the disciplinary area’*
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| **13. Are there any further considerations around co-authored outputs that need be taken into account?** |
| * The approach requires robust auditing of output submission to different units or else there could be instances where outputs are submitted to multiple Units based on a claim of interdisciplinarity through a tenuous link to a descriptor. The volume of outputs cross-referred by panels and/or considered as interdisciplinary in REF2021 shows how easy it is for an output to match many descriptors because some are all-encompassing.
* We welcome the continued use of auditing for a ‘substantive contribution’ as was used in REF 2021 in which authors have a clear, evident, and direct contribution, to an output, but we recognise this is somewhat at odds with the de-coupling of staff principle.
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**Impact Case Studies**

The funding bodies propose to reduce the minimum number of impact case studies required to one. They also propose to revise the boundaries, including splitting the lowest boundary (Annex A, paragraph 33-37). The funding bodies are particularly keen to hear the views of institutions with small units.

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| **14. What will be the impact of reducing the minimum number to one?** |
| * We welcome the change to the minimum threshold for smaller units in association with the introduction of the narrative statement.
* There is a risk that staff in smaller units are discouraged from working on impact, simply because only one impact case study is required for submission, however we feel that this is effectively countered by the introduction of narrative statement which encourages institutions to facilitate and invest in broader impact and engagement activities, which do not necessarily conform to the REF impact case study format.
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| **15. What will be the impact of revising the thresholds between case study requirements?** |
| * We welcome the change to threshold boundaries, so long as auditing of HESA data UoA alignment is robust, to avoid artificial volume-contributing modelling, simply to remain within thresholds.
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| **16. To what extent do you support weighting the impact statement on a sliding scale in proportion to the number of case studies submitted?** |
| * We welcome the opportunity for smaller units with one x ICS to have an opportunity to describe broader impact activity in the unit, but 50% is a high weighting for the statement. Small units could inherently have a weaker impact/ engagement strategy simply due to the cohort size but in this model, they might be penalised by failing to demonstrate a thriving impact culture, despite generating a strong example of impact.
* The minimum of 20% for the statement for the highest number of ICS also seems high. Further details needed on the content of the statement would make it easier to judge.
* Considering the newness of this narrative, it might be appropriate to pilot the statement at 10% for all units in this REF exercise and increase the weighting in a future REF, once it is embedded and understood by institutions and the panel reviewers.
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**Unit of Assessment**

The funding bodies propose to retain the REF 2021 Unit of Assessment structure (Annex B). The funding bodies invite views from disciplinary communities and institutions on any disciplinary developments since REF 2021 that would require changes to be made to the UOA structure.

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| **17. If the UoA structure is relevant to you/ your organisation, please indicate clearly what you propose to the UoA Structure and provide your rationale and any evidence to support your proposal.** |
| The structure seems appropriate as is, and by staying the same it provides some continuity from REF 2021 and understanding of the groups of disciplines that make up a UoA .  |

**Impact of the Covid-19 pandemic**

The funding bodies intend to retain the statements on Covid impact that were used in REF 2021, and to require some consideration of how Covid impacts have been addressed in output selection as part of Codes of Practice.

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| **18. What is your view on the proposed measures to take into account the impact of the Covid pandemic?** |
| As EDI seems to be at the heart of REF2028, we are generally supportive of the proposed measures. More clarity / assurance on how the panel members will be trained / advised to use these statements consistently, transparently and reward appropriately, is required. |

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| **19. What other measures should the funding bodies consider to take into account the impact of the Covid pandemic?** |
| No further measures should be implemented in this regard. However, if the Covid pandemic has affected some institutions disproportionately, that should be taken into account via the quantitative unit reduction circumstance process.  |