



# **Consultation on Research Excellence Framework (REF) 2021 Draft Guidance and Criteria**

Council for Allied Health Professions  
Research

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## Introduction

The Council for Allied Health Professions Research (CAHPR) is the representative voice of the 13 AHP professions on research matters. Our member organisations include:

- British and Irish Orthoptic Society
- British Association of Art Therapists
- British Association of Drama Therapists
- British Association for Music Therapy
- British Association of Prosthetists and Orthotists
- British Dietetic Association
- College of Paramedics
- College of Podiatry
- Chartered Society of Physiotherapy
- Institute of Osteopathy
- Royal College of Occupational Therapists
- Royal College of Speech & Language Therapists
- Society and College of Radiographers

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<https://cahpr.csp.org.uk/>

## Executive Summary

This response was made in relation to Main Panel A: Medicine, Health and Life Sciences (Sub-Panels 1-6), some comments relevant to all panels.

- Generally the guidance on submissions, panel criteria and working methods is acceptable.
- We would request that particularly in UOA 3 multiple submissions should be allowed. We know that there are a large number of professions represented in UOA3 and that researchers in these professions will often collaborate with a range of researchers from other fields
- There could be a potential disadvantage to the Allied Health Professions due to the proposal to include all research active staff. This shift has been described as advantaging research-intensive universities and disadvantaging newer universities where most lecturers have to combine a heavy teaching load with research (i.e. there are fewer 100% researchers). More AHP led teams are based in new universities than in research-intensive universities. There is evidence that some AHP academics have been moved into teaching only contracts to address the REF proposed inclusion – this raises concerns as how do we teach the next generation to become researchers if the academic staff cannot research or are in institutions which are unable to fairly access QR funds?
- We recommend a list of professions and specialities to be included in the impact template. It would be very helpful for to help searches both within the REF assessment and also afterwards when impact case studies are made available publicly.
- We recommend including a full list of Allied Health Professions as listed on the HCPC website in the unit of assessment descriptor.
- We anticipate overlap and/or the need for cross-referral for all AHPs in all UOAs. AHP research tends to be interdisciplinary and covers a wide range of topics and client groups, with high impact. Given the number of UOAs receiving AHP submissions, and the breadth of each Unit, it will be very important to ensure equity across submissions. Determining what AHP submissions are anticipated, and to what UOAs, during the 2019 survey of institutions' submission intentions might clarify this.
- A better index of subjects and topics on the final searchable website would be helpful. At present, research in the AHPs areas tends to be hard to track down and so hard to summate, which could be solved by more detailed coding.
- We would like to see ,especially for panel UOA3, that there is expert representation and the assessors group from each of the professions included in the panel. This comment relates particularly to all the 13 Allied Health Professions.

## **Guidance on submissions: Part 1: Overview of the assessment framework**

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

Agree

#### **a. Please provide any comments on Part 1.**

Page 11 30b, REF2 the total number of outputs ie 2.5 times the summed FTE is slightly confusing giving an example would help to clarify

Page 14 para 47. It would be useful to have some examples of what terminology will be used in the searchable database eg profession /specialism specific .This is particularly important for UOAs which include large numbers of professions eg UOA3

Page 19 Para 58C. How does this number relate to page 11 30b. REF2? It needs clarification

### **2. Guidance on submissions: Part 2: Submissions**

#### **a. The guidance is clear in 'Part 2: Submissions':**

Strongly agree

#### **b. Please provide any comments on Part 2. (300 word limit)**

Is there a specified formula as to how HEIs should use REF funding awarded? It appears that sometimes funding may be used for different purposes in an HEI.

We would request that particularly in UOA 3 multiple submissions should be allowed. We know that there are a large number of professions represented in UOA3 and that researchers in these professions will often collaborate with a range of researchers from other fields e.g. Medicine , Engineering, Biomechanics ,Sports scientists, Artists, Psychologists to name but a few . This may be the same in other disciplines. It would be helpful if multiple submissions could be made which would avoid potential game playing in universities in terms of creating groups which don't normally exist within their institution.

### **3. Guidance on submissions: Part 3, Section 1: Staff details (REF1a/b)**

#### **a. The guidance is clear in 'Part 3, Section 1: Staff details':**

Strongly agree

**b. Please provide any comments on Part 3, Section 1. (300 word limit)**

In the main the guidance is very clear is clear but it has been noted that there could be a potential disadvantage to the Allied Health Professions (AHP) due to the proposal to include all research active staff. This shift has been described as advantaging research-intensive universities and disadvantaging newer universities where most lecturers have to combine a heavy teaching load with research (i.e. there are fewer 100% researchers). More AHP led teams are based in New Universities than in Research-Intensive Universities, for example no universities with Dietician undergraduate and postgraduate programmes are included in top 10 QR funds in this list. <https://www.timeshighereducation.com/news/ref-tactics-can-you-win-by-fielding-the-whole-team/2020035.article> The total inclusion included in the guidance looks a good move to promote strong research but will possibly ensure that research activity becomes divorced from education activity. There is evidence that some AHP academics have been moved into teaching only contracts to address the REF proposed inclusion – this raises concerns as how do we teach the next generation to become researchers if the academic staff cannot research or are in institutions which are unable to fairly access QR funds? It further impairs the status of universities with less research because most of the university guides include research metrics even when they are designed to be relevant to teaching, i.e. if you are brilliant at teaching but have a poor REF outcome, the overall rating will be negatively impacted by this therefore REF matters to all academics, not just those in research or in research-intensive universities.

**4. Possible indicators of research independence are set out at paragraph 130, including a reference to a list of independent fellowships. This list is intended to guide institutions on determining independence for staff holding fellowships from major research funders. The list is not intended to be comprehensive. Do you have any comments on the clarity, usefulness, or coverage of this list? (300 word limit)**

The statement is very clear and useful

**a. Do you agree with the proposed eligibility of seconded staff set out at paragraphs 121.c to d?**

Yes

**b. Please provide any comments on this proposal. (300 word limit)**

None needed

**5. Do you agree with the proposed ineligibility of staff based in a discrete department or unit outside the UK?**

Yes

- a. **Please provide any comments on this proposal. (300 word limit)**

It is appropriate

6. **Guidance on submissions: Part 3, Section 1: Staff circumstances (paragraphs 149 to 193)**

- a. **The proposed approach for taking account of circumstances will achieve the aim of promoting equality and diversity in REF 2021:**

Agree

- b. **The potential advantages of the proposed approach outweigh the potential drawbacks identified:**

Agree

- c. **Please provide any further comments on these proposals, including any suggestions for clarifying or refining the guidance. (300 word limit)**

No comments

7. **Guidance on submissions: Part 3, Section 2: Research outputs (REF2)**

- a. **The guidance in 'Part 3, Section 2: Research outputs' is clear:**

Strongly agree

- b. **Please provide any comments on Part 3, Section 2. (300 word limit)**

The guidance is very clear and useful

Pages 74/75 re Paragraph 255 it would be useful for the professional/speciality relevance to be added as well as the type of research methodological approach/approaches used. Otherwise it is all very clear.

8. **A glossary of output types and collection formats is set out at Annex K, to provide increased clarity to institutions on categorising types of output for submission. Do you have any comments on the clarity and usefulness of this annex?**

The Glossary is very helpful

- 9. Paragraph 206.b sets out the funding bodies' intention to make ineligible the outputs of former staff who have been made redundant (except where the staff member has taken voluntary redundancy). Do you agree with this proposal?**

No

- a. Please provide any further comments on this proposal. (300 word limit)**

Institutions may make individuals redundant for a number of reasons. Eligibility of those made redundant should be discussed on an individual basis with the Institution concerned. So they would be considered on a one to one basis.

- 10. Do you agree with the proposed intention to permit the submission of co-authored outputs only once within the same submission?**

Yes

- a. Please provide any comments on this proposal. (300 word limit)**

It is sensible to do, so however this has been the pattern in previous REF exercises, but tends to limit collaboration within co-sited teams.

- 11. Guidance on submissions: Part 3, Section 2: Research activity cost for UOA 4**

- a. How feasible do you consider to be the approach set out at paragraphs 267 to 271 for capturing information on the balance of research activity of different costs within submitting units in UOA 4? (300 word limit)**

We cannot comment on this but why is only UOA4 singled out? There will also be different costs associated with research activities in other UOAs.

- b. Are the examples of high cost and other research activity sufficiently clear to guide classification? (300 word limit)**

We cannot comment on this in terms of UOA 4 but it could be that balance of research activities and costs need to be explored in other UOAs.



- c. Please provide feedback on any specific points in the guidance text as well as the overall clarity of the guidance. (300 word limit)**

Overall the guidance is very clear. Re page 81 Paragraph 281 it will be interesting to know which citation base the panels will use as they are all not comparable.

**12. Guidance on submissions: Part 3, Section 3: Impact (REF3)**

- a. The guidance in 'Part 3, Section 3: Impact' is clear:**

Strongly agree

- b. Please provide any comments on Part 3, Section 3. (300 word limit)**

Page 91 Paragraph 320 it may be useful to add professional/subject matter relevance. Otherwise the Guidance is very clear.

In the impact template it would be very helpful for a list of professions and specialities to be included to help searches both within the REF assessment and also after the REF when the Impact case studies are made available publicly.

**13. Guidance on submissions: Part 3, Sections 4-5: Environment data and environment (REF4a/b/c-REF5a/b)**

- a. The guidance in 'Part 3, Section 4: Environment data' is clear:**

Strongly agree

**14. The guidance in 'Part 3, Section 5: Environment' is clear:**

Strongly agree

- a. Please provide any comments on Part 3, Section 5. (300 word limit)**

There are concerns about how the REF data is used – i.e. often to promote research quality to attract students although it is not a measure of teaching quality.

The issue of teaching and research becoming divorced is a wider problem. It would be a pity if the REF process drives universities and their staff to truly become either 'teaching focused' or 'research focussed' (with little overlap in the middle).

## 15. Guidance on Submissions: further comments

Please provide any further comments on the 'Guidance on submissions', including Annexes A-M. (500 word limit)

The Output Glossary is very clear and will be extremely helpful.

### **Panel criteria and working methods: Part 2: Unit of assessment descriptors**

1. Do the UOA descriptors provide a clear and appropriate description of the disciplines covered by the UOAs? Please include any suggestions for refining the descriptors and state which UOA(s) you are commenting on.

UOA 3: Allied Health Professions, Dentistry, Nursing and Pharmacy

#### **Where relevant, please state which UOA(s) you are commenting on.**

It will be useful to include a full list of Allied Health Professions as listed on the HCPC website.

We note that Osteopaths and also Dieticians are not listed in Paragraphs 66 and 67

The UOA descriptors provide illustration and description of the disciplines covered by the UOAs, and also indicate where overlap and/or the need for cross-referral is anticipated, which is in all UOAs. This is of importance to all the Allied health Professions for example the RCSLT, as different aspects of SLT research are reported across several UOAs. As an illustration, RCSLT retrieved Impact Case Studies from the 2014 REF results related only to childhood disabilities and found SLTs contributions in seven UOAs across all four Main Panels: Main Panel A - Public Health, Health Services and Primary Care; Allied Health Professions, Dentistry, Nursing and Pharmacy, and Psychology, Psychiatry and Neuroscience: Main Panel B - Computer Science and Informatics: Main Panel C - Education, and Main Panel D - Modern Languages and Linguistics, and English Language and Literature.

The reported research was appropriately submitted into the above categories, usually relating to the academic disciplines within the university context in which SLT researchers worked which determined the research environment. AHP research tends to be interdisciplinary and covers a wide range of topics and client groups, with high impact. However, given the number of UOAs receiving AHP submissions, and the breadth of each Unit, it becomes very important to ensure equity across submissions. This means that many submissions will require the expert review and cross-referral processes outlined in the draft. Determining what AHP submissions are anticipated, and to what UOAs, during the 2019 survey of institutions' submission intentions (§35) might clarify this.

## **2. Panel criteria and working methods: Part 3, Section 1: Submissions**

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

Agree

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

Strongly agree

**c. Please comment on the criteria in 'Part 3, Section 1: Submissions', in particular on:**

- where further clarification is required- where refinements could be made
- whether there are areas where more consistency across panels could be achieved
- whether there are differences between the disciplines that justify further differentiation between the main panel criteria.

**Where referring to particular main panels, please state which one(s). (300 word limit)**

Institutions submitting AHP research which is interdisciplinary or could be relevant to several UOAs (§387 - 392) will have the opportunity to request cross-referral and further advice. It is likely that a large number of 'flagged' interdisciplinary research outputs will be made.

We are aware that a number of AHP organisations have in the initial round of nominations in 2017 provided names of those with expertise in the use and benefits of research across the private, public and third sectors, and who could comment upon research quality, and would provide further suggestions on request. Our concern throughout this response is to ensure that those with specialist knowledge of the work of specific AHPs and particular specialities assess submissions, and there are clear proposals to recruit appropriate individuals to provide additional expertise for cross-referencing and cross-UOA liaison within the draft guidance.

## **3. Panel criteria and working methods: Part 3, Section 2: Outputs**

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

Strongly agree

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

Agree

**c. Please comment on the criteria in 'Part 3, Section 2: Outputs', in particular on:**

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

**Where referring to particular main panels, please state which one(s). (300 word limit)**

The criteria are mostly clear we suggest clarifying "Contribution to theory building" as stated on page 44 -199. If not clear there may be outputs submitted that may simply be opinion pieces.

Citation information varies considerably across different providers it will be useful to clarify for each UOA which database has the most robust citation data.

Annex C main panel D is clear and helpful. However It is not clear why guidance re. output types only applies to Main Panel D, although it might be most useful there? Criteria for double weighting appears to vary amongst panels, and to have different requirements for applying and the evidence required, and whether they will be automatically/ routinely accepted. It is not clear why, and commonality amongst panels would be preferable.

#### **4. Panel criteria and working methods: Part 3, Section 3: Impact**

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

Strongly agree

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

Strongly agree

**c. Please comment on the criteria in 'Part 3, Section 3: Impact', in particular on:**

- where further clarification is required
- where refinements could be made
- whether there are areas where more consistency across panels could be achieved

**- whether there are differences between the disciplines that justify further differentiation between the main panel criteria.**

**Where referring to particular main panels, please state which one(s). (300 word limit)**

The Criteria appear very clear and robust and there is obvious flexibility in the panels approaches to impact.

To gain consistency across panels would be extremely difficult and may actually be quite negative for some panels.

As with all of the criteria, they are subjective and require subtle judgements. An inter-rater reliability check should be required and considered by each unit, and where possible across units, at an early part of the decision-making process.

The wide range of impacts listed is useful.

**5. Panel criteria and working methods: Part 3, Section 4: Environment**

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

Strongly agree

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

Strongly agree

**c. Please comment on the criteria in 'Part 3, Section 4: Environment', in particular on:**

**- whether the difference in section weightings across main panels is sufficiently justified by disciplinary difference (paragraphs 322 and 323)**

**- whether the list of quantitative indicators provided at [www.ref.ac.uk](http://www.ref.ac.uk) is clear and helpful**

**- where further clarification is required**

**- where refinements could be made**

**- whether there are areas where more consistency across panels could be achieved**

**- whether there are differences between the disciplines that justify further differentiation between the main panel criteria.**

**Where referring to particular main panels, please state which one(s). (300 word limit)**

We are not sure why the Main panel D supplementary criteria are different from the others in terms of section weightings.

The list of indicators are clear and very helpful.

Too much further differentiation between the main panel criteria could be problematic particularly as increasingly there is more collaboration between disciplines based in different main panels for example between fine artists and health professionals. The alternative is to include more clarification re cross-disciplinary working.

There does not seem to be sufficient justification for the differences, but none for equal weighting either with such subjective measures, where the data is hard to verify and only partly quantitative.

#### **6. Panel criteria and working methods: Part 4: Panel procedures**

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

Strongly agree

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

Strongly agree

**c. Please comment on the criteria in 'Part 4: Panel procedures', in particular on:- where further clarification is required or where refinements could be made. (300 word limit)**

They seem very appropriate however please see above comments about appropriate and expert assessment, and the probable need for referral.

#### **7. Panel criteria and working methods: Part 5: Panel working methods**

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

Strongly agree

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

Strongly agree

**c. Please comment on the criteria in 'Part 5: Panel working methods', in particular on: - where further clarification is required or where refinements could be made. (300 word limit)**

The criteria are extremely clear and appropriate

## 8. Overall panel criteria and working methods

- a. **Overall, the 'Panel criteria and working methods' achieves an appropriate balance between consistency and allowing for discipline-based differences between the panels.**

Strongly agree

- b. **Please comment on the balance between consistency and allowing for discipline-based differences between the main panels. (300 word limit)**

Agree that there is largely a good balance our only concern relates to our earlier comment in 5c.

This is discussed above, and the procedures here seem clear. However, a better index of subjects and topics on the final searchable website would be helpful. At present, research in the AHPs areas tends to be hard to track down and so hard to summate, which could be solved by more detailed coding.

We would also like to see especially for panel UOA3 that there is expert representation on the panel and the assessors group from each of the professions included in the panel. This comment relates particularly to all the 13 Allied Health Professions.