



**The Learned Society of Wales' response to
'Research Excellence Framework 2028:
issues for further consultation following initial decisions'**

The Learned Society of Wales is Wales's national academy for arts, humanities and sciences. We have nearly 680 Fellows from across all academic fields and beyond. We harness the multidisciplinary expertise, experience and connections of our Fellowship to promote and develop Wales' research and innovation community, and to support the use of excellent and diverse research to solve the challenges faced in Wales and across the world. Established in 2010, the Society is a registered charity, and secured its Royal Charter in 2015.

We welcome the opportunity to respond to the consultation on the Research Excellence Framework 2028 and our responses to the consultation survey are included in Annex A. In addition to answering the survey questions, we would like to offer some further reflections, outside the constraints of the survey format.

1. The Learned Society of Wales strongly supports the general aspirations expressed in the document regarding research culture, diversity and inclusion. We are very pleased to see these issues being considered at this high level. They are crucially important issues.
2. We also recognise the powerful role the REF process has had in driving research behaviour in HE institutions in the UK. In that sense we understand why the current document reflects the view that the 2028 REF may be an effective tool for addressing these issues.
3. However, as a Learned Society, we remain to be convinced that the processes proposed will achieve these desired aims. We remain concerned that the pressures and forces HE institutions feel during the REF process may lead to, as yet unclear, unintended consequences. We urge caution in this thinking; namely the basic idea that a REF process can and should be used to drive all desired changes in research culture, inclusivity and diversity.
4. Turning to consider various matters in more detail, one of our first concerns relates to possible unexpected and undesirable effects of gameplaying relating to decoupling outputs from researchers and to the system set in place for measuring unit size/number of research-active staff/number of outputs. Besides gameplaying in relation to star researchers we fear negative effects in relation to early-career researchers, e.g. institutions placing early-career researchers on non-research tracks, instead of offering appropriate support to increase their research output both in volume and quality. It seems to us that de-coupling outputs from individual researchers neither resolves nor improves the issue.
5. Furthermore, we would caution the separation of outputs from individuals from an Equality, Diversity and Inclusivity (EDI) perspective. EDI considerations apply to individuals, not outputs, and therefore further work should be undertaken to ensure this separation would not lead to unintended backwards steps in the progress made in EDI practices due to previous REF exercise requirements.
6. In spite of the mention of interdisciplinary research, the focus continues to be on disciplinary knowledge. It seems to us that REF has still not established processes by which to properly

recognise and reward interdisciplinarity. The language in the relevant section confirms this, as do other indicators: for instance, it is interesting to read about 'collaboration beyond the institution' being encouraged, when much less is said about cross-disciplinary collaboration within an institution.

7. This highlights another concern with how language needs further consideration. There should be systematic attention paid to the language dimension of the way in which research is conducted (and by whom) and reported (and for whom). For example 'Research integrity', 'diversity' of outputs and audience, and other such concerns are mentioned, but there are still significant issues – starting from the lack of attention to questions of language, linguistic justice, translation and interpreting, etc. when it comes to research design and budgeting, research practices, or subsequent dissemination.
8. We welcome the fact that impact is by now a fully embedded and central component of research. There has been a clear trend towards improving the visibility of what researchers do in broader society, which can only lead, long-term, to a change in the way society views university research. The engagement element should be given more detailed consideration to ensure that merging impact and engagement doesn't dilute the valuable progress made on the impact agenda.
9. We strongly agree that continuing caution should be exercised regarding the use of AI as an assessment tool, especially in view of EDI concerns across REF as a whole, while also noting the rapid growth in AI capability.
10. We strongly welcome the decision to continue with expert panels and monitor limited and robust use of metrics where appropriate.
11. Generally, we feel that the document struggles with the question of University level matters, versus Unit of Assessment matters. The LSW is concerned about the impact of University level decisions on smaller Units of Assessment. For those who work in small units, the suggestion that 'People, Culture and Environment' might be evaluated at Institutional level only is of concern. Institutions could ignore, i.e. cancel or cut support for, these activities in smaller, less 'visible' areas. We feel that this needs to be monitored carefully.
12. We welcome that the document has recognised the intractable nature of the problems noted by the sector however, there are instances where the solutions lack the details to give us confidence in their efficacy. For instance, we note that 'Over 80% of the outputs submitted to REF 2021 were journal articles, with non-text outputs making up less than 3% of submissions', but apart from encouraging the submission of a 'wide range of outputs', it seems to us that no measures are actually put in place to encourage this.
13. Finally we would like to repeat our statement above "The Learned society of Wales strongly supports the general aspirations expressed in the document regarding research culture, diversity and inclusion. We are very pleased to see these issues being considered seriously at this high level. They are crucially important issues."

Annex A – Consultation survey responses

QUESTION 1: Name

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QUESTION 2 : email

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QUESTION 3: What is your organisation?

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QUESTION 4: Are you answering on behalf of your organisation/institution or as an individual?

On behalf of the organisation.

Volume Measures.

QUESTION 5: What practical challenges may institutions face in implementing these changes?

Individual HE Institutions are better placed to respond to this question, than a Learned Society such as ourselves. We would however offer the following observations:

The current proposals speak strongly to the need to support "an all inclusive and diverse research workforce" as a "key feature of a successful and effective research environment".

It remains unclear to us how this particular recommendation will help achieve that aim.

We note that this recommendation speaks to the issue of reducing the REF administrative workload of HEIs. However adverse effects on the morale, standing, careers or aspirations of staff, those moving between practice and academia, as well as those individuals principally engaged in applied research remain, as institutions seek to optimise their position by designating them as non-researchers.

QUESTION 6: How might the funding bodies mitigate against these challenges?

Whilst the proposals as presented achieve the stated aim of reducing the administrative load associated with REF, our concern is that objective may carry us in the opposite direction required to ensure an inclusive and diverse research workforce. We would suggest that further consideration be given to this point, and if needed more effort is expended to ensure that these laudable objectives are fully achieved.

QUESTION 7: What would be the impact of these changes on individual researchers and particularly those with protected characteristics or other underrepresented groups?

We see the risks we have already described in our answers to questions 5 and 6. We do however believe that these problems can be overcome by further detailed consideration.

Output Submissions.

QUESTION 8: What would be the impact of these changes on individual researchers and particularly those with protected characteristics or other underrepresented groups?

The Learned Society of Wales notes with concern the proposal to fully break the link between individual staff members and unit submission. While we fully understand, appreciate and support the current proposals' support for "an all inclusive and diverse research workforce"...as a "key feature of a successful and effective research environment", it again remains unclear to us if this particular recommendation will achieve that aim. The proposal is a radical departure from all previous REF submissions and in that sense, if change is required on this front, we would prefer a more evolutionary approach. We fear that there may be significant, serious unintended consequences if this proposal is adopted, bearing in mind the power and in impact of REF submission guidelines within individual HEIs.

QUESTION 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?

We have already implied our answer to this question in our response to question 8. We see the possibility of the very significant pressures on HEIs, generated by the REF process to maximise their return, passing through to individual members of staff, leading to the exact conditions we believe the authors of the report wish to avoid. It is not difficult to imagine, for example, that some of the significant numbers of staff now being recruited onto teaching-only contracts, for the hugely important role they are recruited to perform, also feeling under pressure to produce high quality REF outputs.

QUESTION 10: Should outputs sole-authored by postgraduate research students be eligible for submission? If so, should this include PhD theses?

As will be clear from our answers to the above two questions regarding output submission, we also have concerns with this proposal. We prefer to see a concentration at policy level on the training of and support for postgraduate research students, rather than a focus on the publication output they may produce. We again fear the unintended consequence of pressure on postgraduate students, recognising that some students of course might welcome this proposal.

QUESTION 11: What would be appropriate indicators of a demonstrable and substantive link to the submitting institution?

The initial decisions report notes 'anyone employed by the institution on a minimum 0.2 FTE contract for at least 6 months in the REF assessment period' as the intended threshold. This appears to the

LSW to be a rather low bar, with such a weak link potentially leading to undesirable outcomes, such as “gameplaying”. For example, institutions might employ ‘star researchers’ for a limited period of time, only to benefit from their outputs, while they would not build substantive links with the institution. We therefore suggest that this aspect be reconsidered and we would welcome a considerably stronger link with the submitting institution, of the order perhaps of 50% FTE for 2 years or more.

QUESTION 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?

The LSW supports the proposal made in the document.

QUESTION 13: Are there any further considerations around co-authored outputs that need to be taken into account?

The LSW recognises the potential of co-authored outputs as an indicator of an inclusive research culture. As such we are supportive of co-authored outputs being a full part of the REF assessment process. Similarly co-authored outputs might be of considerable importance in the assessment of interdisciplinary research.

Impact Case Studies.

QUESTION 14: What will be the impact of reducing the minimum number to one?

In relation to this question, firstly we note that the funding bodies are particularly keen to hear the views of institutions with small units. Clearly the Learned Society of Wales is not in that category. Bearing in mind that fact, our view is that this proposal seems reasonable.

QUESTION 15: What will be the impact of revising the thresholds between case study requirements?

The LSW supports the proposal made in the document.

QUESTION 16: To what extent do you support weighting the impact statement on a sliding scale in proportion to the number of case studies submitted?

In relation to this question, we again note that the funding bodies are particularly keen to hear the views of institutions with small units. Clearly the Learned Society of Wales is not in that category. Bearing in mind that fact, our view is that this proposal seems reasonable.

Unit of assessment.

QUESTION 17: If the UOA structure is relevant to you/your organisation, please indicate clearly any changes that you propose to the UOA structure and provide your rationale and any evidence to support your proposal.

The proposed Units of Assessment seem reasonable to us, but it seems to us that the issue of interdisciplinary research remains a matter that requires continued detailed, very careful consideration in REF.

Covid-19 pandemic.

QUESTION 18: What is your view on the proposed measures to take into account the impact of the Covid pandemic?

The Learned Society of Wales welcomes this proposal. The full impact of the pandemic is still working its way through our society, with HEI staff as affected as any other group. We trust that these aspects will be fully accommodated in the REF submission process.

QUESTION 19: What other measures should the funding bodies consider to take into account the impact of the Covid pandemic?

No further comment.

Cymraeg in HEFCW

QUESTION 20: What positive or adverse effects will the proposals have on opportunities for persons to use the Welsh language and treating the Welsh language no less favourably than the English language?

The Learned Society of Wales strongly supports the viewpoint expressed by the Coleg Cymraeg Cenedlaethol and wishes to acknowledge the generosity of the Coleg in sharing its considerations with the Society. The following differs in some details from the response forthcoming from the Coleg.

Context

The Welsh Government aims to increase both the number of Welsh speakers and its use. It has set the target of a million speakers by 2050, and has noted its intention to reflect this aim in law. This goes further than the Welsh Language (Wales) Measure 2011, which replaced the Welsh Language Act 1993, and which makes provision about the official status of the Welsh language and public bodies' duty to ensure it is not treated less favourably than English.

The million speakers aim underpins all public policy efforts concerning the Welsh language at present. The Coleg Cymraeg Cenedlaethol works with further education colleges, universities, organisations that offer apprenticeships, and employers to create opportunities to train and study in Welsh. The Coleg supports universities to increase the studying opportunities available to students through the medium of Welsh. A strong base of Welsh-medium research supports undergraduate teaching and helps make that provision sustainable by ensuring that the next generation of teaching and researching staff is trained.

The million speakers aim is also reflected in the fact that the new Commission for Tertiary Education and Research (CTER) is tasked with 'supporting the continued growth of the research sector in Wales...with a focus on collaboration and the undertaking of research, including through the medium of Welsh' (Tertiary Education and Research (Wales) Bill 2022, Explanatory Memorandum).

Given the key role played by REF in determining funding, REF 2028 could have unintended negative effects on this policy aim if it were to, for example, unintentionally exclude Welsh-medium outputs or reward institutions which do not provide a supportive environment for those wishing to produce

Welsh-medium research. Below we outline how the proposed changes could have positive and negative effects in this regard.

People, culture and environment

Positive

Overall, Welsh institutions made little reference to the Welsh language in their environment-level statements for REF 2021. Increasing the weighting to 25% provides greater opportunity for institutions to showcase and highlight the role the Welsh language plays within research units, within the institutional culture more generally and in the institution's interactions with the people and cultures around it. Indeed, as this element is to become such an important part of REF 2028, there is a strong incentive for Welsh institutions to use the Welsh language as an opportunity to demonstrate diversity, inclusion and civic engagement. In this respect REF2028 should recognise and reward evidence that the research environment is enriched by activity in the Welsh language. HEIs in Wales would then be incentivised to develop and support the use of Welsh in research and civic engagement. The latter would include the contributions most Welsh institutions make to the annual National Eisteddfod of Wales where they have an opportunity to communicate with of order 200,000 members of the general public.

Negative

The move towards a questionnaire-style template may have negative effects on use of the Welsh language unless there is specific, explicit reference to the language in the questions, guidance or example indicators.

Contribution to knowledge and understanding

Positive

The opportunity for all staff to be returned may be a benefit, as many staff with specialist Welsh-medium research skills and experience are on teaching-only or non-academic contracts.

Negative

Decoupling individual staff and unit submissions could result in fewer Welsh-language outputs being produced or chosen for submission. Assuming that inclusion in REF 2028 is still viewed as a career aim and a means of ensuring job security (despite the welcome move away from 'publish or perish'), this would have the negative effect of discouraging individuals from producing Welsh-medium research, thus lessening use of Welsh. This is a particular concern for ECRs.

QUESTION 21: Could the proposals be changed to increase positive effects, or decrease adverse effects on opportunities for persons to use the Welsh language and treating the Welsh language no less favourably than the English language?

The Learned Society of Wales strongly supports the viewpoint expressed by the Coleg Cymraeg Cenedlaethol and wishes to acknowledge the generosity of the Coleg in sharing its considerations with the Society. The following differs in some details from the response forthcoming from the Coleg.

People, culture and environment

The Welsh language should be an explicit consideration in the template or guidance provided for unit-level and institutional statements. In our view, simply ensuring that Welsh HEIs give formal and meaningful consideration to the Welsh language in this element of REF will indirectly increase opportunities to use the Welsh language, with little added administrative burden.

For REF 2028, we would suggest requesting a short narrative statement at both unit and institutional level evidencing how the Welsh-medium research is being supported (e.g. by developing a research culture which facilitates Welsh-medium research, using Welsh as part of its civic mission and engagement with local communities, detailing cooperation with the Coleg Cymraeg Cenedlaethol, and using Welsh-medium research to drive undergraduate provision).

Consideration should be given to developing formal indicators concerning the Welsh language as part of the 'People, culture and environment' template, and working with HESA to collect data that help fulfil the requirement (e.g. data on the Welsh-language skills of research-only staff). REF2028 should favourably regard evidence provided by HEIs that demonstrates their commitment to developing the use of Welsh in research and outreach activities.

Contribution to knowledge and understanding

In the accompanying explanation for each unit, Welsh HEIs should be asked to specifically note how their submission is representative of Welsh-medium research within that unit. Even units where the volume of Welsh-medium research is too small to be 'representative' of that unit's research output would be advised to submit Welsh-medium outputs as a demonstration of commitment to Welsh-medium research (perhaps stated in the 'People, culture and environment' statement).

Equality advisory committee

The Welsh language should be a standing matter on the agenda of the equality advisory committee in light of its special status in Wales. One committee member should possess expertise on the relevant legislation and policy and their application to Welsh HEIs.