

**History & Policy response to HEFCE consultation on
the Research Excellence Framework
December 2009**

1 Consultation question 1

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

History & Policy (H&P; www.historyandpolicy.org) is a charitably-funded initiative based in the Centre for Contemporary British History at the Institute of Historical Research, University of London, and managed in collaboration with the University of Cambridge, and Centre for History in Public Health at the London School of Hygiene and Tropical Medicine. H&P has been working since 2002 to increase the impact of historians' research on the policy world. We have a network of over 240 historians, mostly based at HEIs throughout the UK (including Wales, Scotland and Northern Ireland), and we support them in communicating their work to policy audiences and influencing policy discussion and outcomes.

This response is submitted on behalf of the H&P management team: Professor Virginia Berridge (London School of Hygiene and Tropical Medicine), Dr Alastair Reid (Girton College, Cambridge), Professor Richard Roberts (Institute of Historical Research, University of London) Dr Simon Szreter (St John's College, Cambridge), Professor Pat Thane (Institute of Historical Research, University of London) and Mel Porter (H&P External Relations Manager and former civil servant). Our response is based on our extensive experience and knowledge of both the academic and policy worlds, and our collective desire to develop the relationship between academic historians and policymakers.

We are firmly of the belief that excellent historical research can, and should, have an impact on current policy, and we agree with the spirit and principle of the REF proposals, specifically in relation to the new strand on impacts, which is our main area of interest. The RAE did nothing to incentivise public and policy engagement by academics and we very much welcome the fact that the REF will address this. However, we have concerns about the details of the impacts strand as currently described, which we would like to see amended in the final proposals. H&P works to ensure that only high quality historical research is disseminated to policymakers and we therefore support the continued focus on 'excellence'. However, we urge HEFCE to ensure that the REF neither rewards low quality research that achieves high impact nor incentivises 'quick wins' in the public arena that do little to progress and deepen knowledge and research over the long term.

We propose, for the reasons described below, that the weight of the impact assessment be reduced to 15% until the criteria and assessment mechanisms have been properly tested and evaluated.

H&P urges HEFCE to take note of the extensive work undertaken by the British Academy and the AHRC in the impacts field and its relationship to the humanities and social sciences.

2 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.*

H&P welcomes the encouragement of people-exchange between universities and the private/wider public sector, and the fact that academics who undertake secondments of this sort will not be disadvantaged in the REF (para 35).

We particularly welcome the fact that non-conventional academic literature, designed to inform and influence policymakers, will in future count as outputs, though there needs to be clarification as to precisely what types of work this will encompass. H&P publishes short, policy-focused papers by historians, based on high-quality research, which are disseminated to policy, public and media audiences. It is not clear whether these will count as outputs in their own right, or as evidence that the research they are based on is being ‘present[ed]... in a form meeting the needs of its potential audience... beyond the academic community’ (para 38). H&P believes it is vitally important that work should be credited which attempts, through appropriate dissemination activities, to achieve policy impact, and not only work that ‘end users’ deem to have had impact. Otherwise, there is a serious risk that only academics who ‘toe the party line’ will be rewarded.

3 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.*

H&P agrees that there are complex issues to be resolved around attribution, time lags, metrics and corroboration, but has concerns about how these will be managed to ensure a fair and meaningful system.

We support:

1. the use of case studies to describe examples
2. the 'assessment' of impacts, rather than any attempts to 'measure' them through bibliometrics
3. the intent to create a 'culture of impact' at unit level

We have concerns about:

1. the current approach to the time lag between outputs and impacts
2. the subject range and timing of the pilot exercise on impact criteria, including attempts to tie impacts to individual research outputs, while assessing impact at unit level
3. the proposed definition of potential users, construction of user panels and their role in assessment
4. the relationship between research produced in one field and its use in another field 'closer to the market'
5. the risk of perverse incentives to produce high impact, low quality work
6. the risk of negative impacts on the relationship between researchers and knowledge transfer specialists

1. Time lag

We question the need for a time limit (para 62) to address time lags between research and impacts. Provided the research is of good quality and the impact worth achieving, does it matter at what point the impact manifests itself? It is not simply the case that there can be a long incubation period between the original research and its impact, but also between the activity to achieve impact, and actual impact occurring or becoming apparent to the academic, as the following case study illustrates:

In 1984 H&P co-founder Simon Szreter published an article in the British Journal of Sociology on the history of the then-current Registrar-General's social classification of occupations, which originated in 1911 and had been in use ever since, reinforcing the idea that we lived in an unchanging social hierarchy with the liberal professions at the top and the unskilled working class at the bottom. This article was both a history and a critique. Thirteen years later, the Economic and Social Research Council and Office of Population, Censuses and Surveys published a long-overdue, official review of this official classification scheme. Dr Szreter's article was cited extensively at the beginning of the document and credited as one of the important influences on the policymakers who had decided to revise the scheme. At the 2001 census, 17 years after the article was published, a new official classification scheme came into use.

This was a very definite policy impact, achieved through both research and dissemination activity that took place 17 years previously.

Instead of insisting that the activity that leads to impact must take place during the assessment period (para 67), we suggest that it would be more effective to assess evidence of impact that has become apparent during the assessment period, regardless of when the original research or the activity to achieve impact actually took place. This would truly reward academics who have a long-term record of policy-relevant research, but where the results may not become apparent until much later on. This would also help to foster a real culture of engagement within assessment units, because academics would know that effort applied now, might reap rewards well into the future. Furthermore, the most important impacts are likely to be achieved as a result of a researcher's overall reputation and standing in their field, built up over a lifetime (see below). For these reasons, we suggest that the time limit should either be abandoned altogether, or extended to at least 20 years.

2. Impact criteria

It is disappointing, given the size of the subject area, that a history department was not included in the pilot exercise on impact criteria (para 69), and that this exercise is taking place at such a late stage in the development of the REF. We await with interest the results of the pilot exercise and encourage Hefce to consult further on the proposed impact criteria before they are finalised. Having had significant experience in attempting to assess and demonstrate the impact of historical research on policy, we are well aware that this is a challenging area that does not lend itself to tick-box solutions. The concepts of 'reach' and 'significant/transformational' impacts are currently vague and untested.

There is an assumption in Annex D, that impact manifests itself in a linear and obvious way e.g. through direct references in a policy document or on the word of an individual who can be asked to corroborate. This is very rarely the case in practice, and sometimes even extensive detective work can fail to determine whether impact has been achieved. There is also a bias in the current draft towards a) commissioned research and b) impacts on government/national policy. The current category of 'better-informed public policymaking or improved public services' focuses far too narrowly on influencing the activities and policies of central government and UK legislation. This category should be drawn much more widely to credit impact on the policies of devolved, regional and local government, opposition and minority political parties, select committees and all-party groups, individual elected representatives (at all levels), NGOs and campaign groups (including internationally). There will be a serious threat to academic freedom if impact is only deemed to have occurred if an 'end user' has commissioned work, or agrees with its conclusions, or if research found favour with the government of the day.

There is currently a tension between the ambition to link impacts to individual outputs, and plans to assess impact at unit level. Impacts are likely to owe more to the reputation and standing of an individual researcher within his/her field, built up over many years of delivering excellent research, which leads users to seek out their advice and input. It is this level of general authority in the field that is likely to be of most use to policy users and it is not clear whether or how this can be recognised in

the REF. This type of impact cannot easily be connected either to individual outputs or to one research unit and there will be particular problems if the researcher has been based at more than one institution during the assessment period.

3. Users

We are concerned at the suggestion in para 70 that judgements about impact could be made only by the user panels, particularly in areas such as history where policy impacts are very much an emerging field and there is not yet a clearly established 'user group', outside of the cultural and heritage fields. Para 72 seems to suggest that the expert panellists will decide which activities are 'appropriate' to each discipline and may either not consider policy impacts 'appropriate' to history (see also below re para 101), or may set the bar too high for subject areas where there is not a track record of income from commissioned research, for example. We also propose that the list of 'users' should be significantly expanded to cast as wide a net as possible for those outside academia who may experience benefits from research. For example, the UK and Scottish Parliament, Welsh and Northern Ireland Assemblies and local government are not currently mentioned, but academics can often achieve their greatest impact, while remaining true to the principles of their research, among elected representatives outside of central government. There should also be a catch-all category for the wide range of non-governmental organisations who use research, and different forms of media should be specifically mentioned to reflect their vital role in disseminating and mediating research to policy users. It is also a serious concern that impacts achieved at the international level appear not to be recognised, disadvantaging historians and many other academics who specialise in research that is not UK-focused and have extensive policy networks abroad.

4. Proximity to market

We welcome the intention to credit research that achieves impact after influencing other disciplines 'closer to the market' (para 75). This is very important for history, which is often mediated or represented to policy audiences through researchers in other disciplines, primarily the social sciences. However, it will create an additional link in the 'chain' from research to impact, will be hard to demonstrate and assess, and could increase the risk of historical research being misrepresented or selectively used to support policy arguments by other academics that the historian might not agree with.

5. Perverse incentives

H&P believes that the best-case scenario is that the REF incentivises and rewards policy engagement by academics producing excellent research. The current proposals present a risk that the REF could incentivise academics producing poor quality research to achieve high impacts; this would be the worst possible outcome.

6. Knowledge transfer

We are concerned about the apparent distinction between 'impact' and 'other activities', and the uncertainty this creates for the role of specialist, academic knowledge transfer (KT) work in the REF. Impact will often be achieved when academics work with KT professionals, either in their own university, or at research councils, learned societies and subject-specialist services like H&P. Para 53c states

that action to achieve impact should take place within the submitted unit; H&P, for example, works with historians at universities around the UK to help them achieve policy impacts from their research. The wording of the consultation document suggests that this might disadvantage them and we would like this to be clarified so as not to discourage academics from working with KT specialists, who will not usually be based within their own unit or even the same university. This is addressed to some extent in para 68, but we think that a clearer statement is needed to clarify the appropriate role of KT specialists in helping researchers to achieve impacts for submitted work.

4 Consultation question 4

Do you have any comments on the proposed approach to assessing research environment?

We welcome the proposal to 'support staff working with research users', including as 'intermediaries' to disseminate research (para 79c). However, para 79c also implies that any 'intermediaries' involved in achieving impacts should be based within the same institution as the researcher, creating an unnecessarily narrow focus and possibly a perverse incentive not to engage with intermediaries based elsewhere, although they may be best placed to support academics in a particular field. There is no clear statement in the consultation document about the role of intermediaries, such as H&P, who enhance the research environment of a whole discipline, rather than an individual unit or institution. The REF should incentivise HEIs and whole subject communities to invest in specialist support to help their researchers achieve policy impacts, and this should be more strongly grounded in the environment section.

5 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.

We agree that the proportion of the assessment devoted to impact should be significant enough to incentivise sustained and serious activity in this area and galvanise institutional support for academics spending their time in this we. However, given the fact that the impacts strand is untested, we believe that the proposed 25% weighting is too high and should be reduced to 15%, with 65% for outputs and 20% for environment. This could be increased at a later stage when the criteria and assessment have been properly evaluated and any perverse incentives and other problems ironed out.

6 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.

H&P has no detailed comments to make, except in relation to the user panels. Para 96c states that 'the impact submissions will be reviewed mainly by the user

members', giving them a great deal of control over the impact assessment, possibly at the expense of or in conflict with the views of other panel members with greater knowledge about the subject field. Every possible step should be taken to ensure that impacts in every subject area are assessed by those best qualified to do so, with the most detailed understanding of the subject, and this assessment should not be restricted to the user members of the panels.

7 Consultation question 7

Do you agree with the proposed approach to ensuring consistency between panels?

We support the proposal in para 101 for the panels to exercise a degree of flexibility and to give extra guidance as to how the impact indicators relate to the discipline. However, as mentioned above there is a risk that indicators of policy impacts may be incorrectly assumed to be irrelevant to history, so we would like to see all potential indicators available to every subject, with additional guidance from the panels as to how they might best be applied to different subjects.

8 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.)

No comments.

9 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?

H&P welcomes the introduction of proposals to better incentivise and reward interdisciplinary research, though this will present a further challenge in assessing and attributing impacts.

10 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?

We agree that the REF should support researchers who publish work in non-traditional forms and who spend time in policy organisations.

11 Consultation question 11

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

No comments.

12 Consultation question 12

Do you have any comments about the proposed timetable?

We welcome the fact that attempts to use bibliometric analysis have been abandoned as this could not have been applied in a fair or meaningful fashion to history.

As mentioned above, it appears that there will be very little time to digest the results of the pilot exercise on impact criteria or to consult on the proposals. We urge HEFCE to take all possible steps to ensure that the results of the exercise are published swiftly and there is time for consultation on the resulting criteria.

The wording of para 116d suggests only that research impacts must become evident during the assessment period, whereas previously in the document it is stated that the action to achieve impact must have taken place during this period. This discrepancy requires clarification. As explained above, there appears to be no reason why the action to achieve impact should take place during the assessment period, as there can be a long time lag between the action and its impacts, as well as between production of the research and its impacts. This should be clarified to give researchers the greatest scope to achieve credit for the impacts they achieve, whatever the timescale in the research-action-impact chain.

13 Consultation question 13

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

No comments.

14 Consultation question 14

Do you have any other comments on the proposals?

The H&P managers would be happy to discuss their views further with HEFCE if this would be helpful.

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