

## Annex A

### Consultation questions and response form

- Responses to the consultation should be made by completing the form below, and returning it by e-mail by **midday on Wednesday 16 December 2009**.
- All responses should be e-mailed to [ref@hefce.ac.uk](mailto:ref@hefce.ac.uk). **In addition:**
  - Responses from institutions in Scotland should be **copied to** Pauline Jones, Scottish Funding Council, e-mail [pjones@sfc.ac.uk](mailto:pjones@sfc.ac.uk).
  - Responses from institutions in Wales should be **copied to** Linda Tiller, Higher Education Funding Council for Wales, e-mail [linda.tiller@hefcw.ac.uk](mailto:linda.tiller@hefcw.ac.uk).
  - Responses from institutions in Northern Ireland should be **copied to** the Department for Employment and Learning, e-mail [research.branch@delni.gov.uk](mailto:research.branch@delni.gov.uk).
- We will publish an analysis of responses to the consultation. Additionally, all responses may be disclosed on request, under the terms of the Freedom of Information Act. The Act gives a public right of access to any information held by a public authority, in this case HEFCE. This includes information provided in response to a consultation. We have a responsibility to decide whether any responses, including information about your identity, should be made public or treated as confidential. We can refuse to disclose information only in exceptional circumstances. This means responses to this consultation are unlikely to be treated as confidential except in very particular circumstances. Further information about the Act is available at [www.informationcommissioner.gov.uk](http://www.informationcommissioner.gov.uk). Equivalent legislation exists in Scotland.

#### Respondent's details

<b>Are you responding:</b> (Delete one)	On behalf of an organisation
<b>Name of responding organisation/individual</b>	PraxisUnico (the UK's leading representative body of professionals realising the potential of public sector and charity research for social and economic impact through commercialisation)
<b>Type of organisation</b> (Delete those that are not applicable)	Professional body
<b>Contact name</b>	Lee Willmott
<b>Position within organisation</b>	Communications Officer
<b>Contact phone number</b>	01223 422085
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#### Consultation questions

(Boxes for responses can be expanded to the desired length.)

**Consultation question 1:** Do you agree with the proposed key features of the REF? If not, explain why.

PraxisUnico members work in KT/TT offices in higher education institutions and other similar research organisations. We work closely with academics to support the generation and measurement of the impact of their research. We welcome an appropriate use of impact into the REF and have largely restricted our comments to that aspect. Other representative bodies with university interest will comment on other areas of the proposals.

We are broadly supportive of the proposals and would be keen to be involved in working with and supporting HEFCE during and after the impacts pilot. There is increasing understanding by the academic community of the link between their research and its impact. We note, however, that there is some disquiet within our communities that an overemphasis on impact, at the expense of basic research, may damage the research base

University diversity creates impact diversity. Research impact in different types of university might look very different, e.g. most obviously between a research-intensive university and a less research-intensive one. However impact profile is far subtler than this and institutional strategy and context may result in significant differences even between institutions of the same type,

PraxisUnico has been supporting and promoting the translation and commercialisation of research outputs for many years, and it is notable that individual institutions have developed widely differing, although equally successful approaches to the task

The conceptualisation of impact within the REF consultation follows a very linear and heavily science-oriented model. Detailed input from the pilot will be required to ensure a truly effective approach in many disciplines.

Many of the factors relating to impact are outside of researcher or institutional control. Clarity is needed in distinguishing between measures of impact and measures of possible steps towards impact.

In the area of policy research, we note that research often advises and influences *against* Government policy directions - promoting debate. Care must be taken to ensure that policy advice that has been accepted is not seen as having a greater value (and consequent financial benefit) than advice that has proved politically unpopular.

Whilst we appreciate the spirit of reducing the administrative burden in moving from RAE to REF we note that a different burden will fall upon researchers and also upon the KT support infrastructure within HEIs.

Gradual increase over successive REFs towards 25% in the weighting of impact will allow assessment to become developed and accepted.

We believe the continued funding of excellent fundamental and curiosity driven research, wherever it is found, to be of critical importance. Without it, impact will be reduced rather than improved.

**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.

**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.

### Time lags and attribution

Balancing the long-term and short-term impacts of research will be important. In some areas (such as but not exclusively in the development of pharmaceuticals) impact takes decades to become apparent. Similarly there is a balance to be achieved between rewarding a series of incremental impacts with a single transformative event.

We are also concerned over attribution. It should be made clear whether the individual, group or HEI employing a researcher will be given the credit, especially given the team-based nature of much research activity. The potentially long time lag to impact also means that impacts dating back a long time may not reflect the current organisation structure; and that developing research units (particularly in new or interdisciplinary areas and/or led by early-career researchers) may be disadvantaged by lack of track record.

Collaboration between universities should be seen as positive. An impactful innovation generated by a collaboration of three universities should be claimable by all three.

### Type of evidence to be submitted

We welcome the acknowledgement that there is a range of impact outcomes and the acceptance that these are not simple to measure. As a community we feel it essential that the results of the pilot exercise are shared, and would suggest a series of consultations following the pilots (similar to the present round for the REF itself). Given this is a new measure of performance for institutions we would urge that examples of case studies and metrics are made available to support researchers to understand what is expected from them by way of submission.

### Criteria for assessing impact and the definition of levels for the impact sub-profile

We are pleased to note that a spectrum of impacts will be sought. Impacts on educational practice / pedagogy and on the public understanding of research should, for example, be included. Impacts across the “full range” should not be expected for every unit of assessment, as not all academic units and types of research will lend themselves to this. In addition, the profile should be viewed against unit and institutional strategy. For example, where regional engagement and business support is key, the impacts may not be within the area of new intellectual property or spin-outs. Where there is a strategy of engagement with industry this is likely to drive down intellectual property based impacts such as licensing or spin-out companies. Not all impacts can be transformative and there is a serendipitous element to successful innovations that often depends on external factors and timing.

There are a variety of different definitions of impact in current use and it is important that definitions of impact are consistent across different funding bodies.

Whilst pleased to celebrate the success that we have had from direct commercialisation within the UK we would caution against use of the word “exploitation” as this suggests a very narrow definition of impact, which is precisely what the consultation document tries to steer away from.

### Role of research users in assessing impact

We welcome the inclusion of users on the impact panel and agree that the user perspective is relevant and desirable. In such a complex area we would underline the importance of ensuring that an appropriate range and diversity of users are involved and we support the inclusion of individuals with direct experience of innovation and enterprise drawn from a range of backgrounds – from small companies as well as large. Engaging the entrepreneurial/high growth SME sector will be particularly difficult but also essential. PraxisUnico would be happy to provide and/or comment on a list of suitable individuals.

We would also argue that this should be blended with expertise from the academic sector and from the KT profession (and we would be pleased to take part to support the process). In this way a richer analysis and rigour of debate will occur. The research councils have such blended industry/impact panels that are highly successful. An interesting lesson could be learned from the early days of HEIF assessment where different user representatives were asked to assess and grade proposals and then discussion was focussed on those proposals which received variable ratings from different user communities. This was a very powerful process, but would require significant work as all user representatives on a panel would be required to assess all impact evidence. This may have a significant burden but an effective and equitable process is more important than an administratively convenient one.

The guidelines for assessment by user representatives will need to be clearly understood before case studies are produced. We believe that more than five users per panel will be essential, in order to reflect the diversity within each sector and the range of impacts, including those outside the conventional range of a typical user, for example policy as well as product.

The proposal acknowledges that users of research are busy people. It will be important that the users of research are engaged with the relevant panels and that it is understood that the nature of impact will vary amongst sectors. For example the engineering sector frequently wants universities to direct research to problem solving whilst the pharmaceutical sector often prefers more fundamental research.

There is a general danger that research users will focus on short-term impact (simply because attribution is easier and, reflecting their priority needs). Whilst this might be appropriate for some types of research, it could have a negative role in encouraging the sort of fundamental research that produces groundbreaking impact.

On balance, the definitions of impact sub-profile may be counterproductive and the 4 star rating as for research may not be appropriate. We would urge the Funding Council to be clear about what it wants to recognise and reward and whether it wishes to recognise high-profile and transformative impact or to celebrate and encourage a spread and volume of impact and embed it within research activity.

**Consultation question 4:** Do you have any comments on the proposed approach to assessing research environment?

We believe engagement is part of the effort to achieve impact and believe engagement should be excluded from environment and assessed alongside impact

**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.

Having a separate profile for impact could be very helpful and would allow academic outputs to retain a separate visibility given their importance in the international market.

**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.

**Consultation question 7:** Do you agree with the proposed approach to ensuring consistency between panels?

Yes, noting that considerations of consistency, transparency and potential conflicts of interest will be considered. .

**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.)

Additional body: PraxisUnico ( the UK's leading representative body of professionals realising the potential of university and public sector research through commercialisation)

St John's Innovation Centre  
Cowley Road  
Cambridge  
CB4 0WS

**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?

Interdisciplinary research areas are likely to be relatively new and therefore may encounter the same problem as early-career researchers, in that there has not been sufficient time for a track record of impact to be built up.

Research that crosses citation categories may also need special consideration.

**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?

Yes. We agree that researcher mobility between sectors is a positive contributor to innovation and knowledge exchange.

**Consultation question 11:** Are there any further ways in which we could improve the measures to promote equalities and diversity?

Consideration needs to be given to early career researchers and those returning from a career break as the impact of their research will be harder to demonstrate in the short term.

**Consultation question 12:** Do you have any comments about the proposed timetable?

The timetable really depends on the outcomes of the impact pilot, but it seems likely that a further round of consultation may be needed over an additional period of 12 months before the next exercise.

**Consultation question 13:** Are there any further areas in which we could reduce burden, without compromising the robustness of the process?

A robust process is more important than further burden reduction.

**Consultation question 14:** Do you have any other comments on the proposals?

The role of impact brings with it the responsibility to support innovation and to capture impact. These proposals, if adopted, will broaden the role of technology transfer offices in those UK universities which have adopted the traditional US model (i.e. “technology licensing offices”). Technology and knowledge transfer staff work with researchers on a small proportion of carefully selected research projects to generate high-level impact, especially the creation of new businesses and improvements; and in the performance of existing businesses through collaboration and consultancy which may be related to new products, services, knowledge or processes.

The varied forms of impact described reinforce that support for innovation should be broader than pure commercialisation and revenue generation. However there will be resource implications and we would encourage the Council to reflect on the merits of dedicated funding for such activity and to continue to support the HEIF programme. The technology transfer/knowledge transfer offices are the natural partners to help and advise researchers on addressing and reporting the impact of their research. There is no doubt that that the volume of impact-related work will hugely increase the demands within commercialisation and research support offices, spread across a much wider range of subjects. Instead of working with a small percentage of researchers, technology/knowledge transfer staff may, in the future, spend more of their time on recording impact and on impact statements for the REF and Research Council grant

applications. Our members will welcome this expanded role in university research, but there are clear implications in the need to develop the resource in those offices and to support the staff through training.

The emergence of the Government push for social enterprises is an early indicator of a future trend. Commercialisation and research support staff will require additional training in these softer and more informal areas.

Most importantly, whilst our members have been working for more than a decade to help researchers to produce (mainly) economic impact they would be amongst the first to warn of the dangers in selecting which research to fund based on its anticipated impact. They know on the one hand that it is blue skies research that changes the world and on the other that incremental changes in themselves can be highly valuable to users.

It is vital that having established a research funding system in the UK that has created the research environment second only to the US and that is the envy of the world, that Government continues its support of excellent research wherever it is found, whether or not that research appears to have the promise of economic impact.