

Annex A

Consultation response form for the Research Excellence Framework

1. Respondents should complete the form below.
2. Responses should be e-mailed to refconsultation@hefce.ac.uk by **Thursday 14 February 2008**. HEIs in Northern Ireland should send a copy of their response to research.branch@delni.gov.uk
3. Institutions wishing to express an interest in taking part in the pilot of the bibliometrics indicator should e-mail their details to refconsultation@hefce.ac.uk by Thursday 31 January 2008.
4. 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.

Respondent's details

Are you responding: On behalf of an organisation
(Delete one)

Name of responding organisation/individual British Philosophical Association

Contact name Prof. Helen Beebee

Position within organisation (if applicable) Director

Contact telephone number 0121 414 3625

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Consultation questions

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

Consultation question 1a: Do you endorse our proposals for defining the broad group of science-based disciplines, and for dividing this into six main subject groups, in the context of our new approach to assessment and funding?

N/A

Consultation question 1b: Are there issues in relation to specific disciplines within this framework that we should consider?

N/A

Consultation question 2a: Do you agree that bibliometric indicators produced on the basis that we propose can provide a robust quality indicator in the context of our framework?

N/A

Consultation question 2b: Are there particular issues of significance needing to be resolved that we have not highlighted?

N/A

Consultation question 3a: What are the key issues that we should consider in developing light touch peer review for the non science-based disciplines?

1. We note that the REF does not propose grading or ranking of journal titles for science disciplines (§32). We urge HEFCE to adopt the same policy for non-science disciplines. We are concerned, however, that any 'structured reduction in the amount of reading of outputs' (§53b) *would* entail implicit or explicit ranking of journals or publishers, since it is unclear what other qualitative basis for making a judgement about the quality of publications could be used.

We believe that any introduction of explicit or implicit journal rankings into the research assessment process (such the European Reference Index for the Humanities) would result in long-term behavioural changes that would be detrimental to the discipline of Philosophy.

2. We are concerned that the introduction of any quantitative measures based on citations is likely to affect behaviour in a way that would render the measures unreliable. In the case of the sciences, the REF document says: 'We have expert advice that the scope for influencing citation impact through reciprocal citation ... is not significant within our preferred approach' (§40). 'Citation clubs' are likely to be much more of a threat in smaller disciplines, such as Philosophy, where, for the vast majority of research outputs, overall numbers of citations are likely to be small.

3. The use of citation indices is highly likely to produce better results for more popular areas of Philosophy, where there are more people publishing. For example, other things being equal, someone publishing in medieval philosophy is likely to get fewer citations than someone publishing in metaphysics or the philosophy of mind. We do not see any prospect of being able to normalise citation counts across areas of philosophy, since the judgements of the relative numbers of people working in different areas would have to be extremely fine-grained. (For example, even within, say, the history of modern philosophy, an article on Hume is likely to get much more attention than an article on Berkeley.)

4. Anecdotal evidence suggests that the use of citation indices would serve to reinforce 'quality' judgements about well-known philosophers while not sufficiently recognising the quality of the less well-known. A well-known philosopher can achieve a high citation count even for a bad paper, whereas it can take several years for an innovative and excellent journal article by a less well-known philosopher to achieve recognition. In addition, there are likely to be different time-frames for citations. A not-very-good paper on a fashionable topic might get a high citation rate for a short period after publication, which drops off sharply. By contrast, an extremely important but long and difficult monograph might take several years to establish itself as a major focus for other philosophers' research.

5. Differences in the reasons for which work is cited add an extra layer of complication. There is a vast difference between merely mentioning a particular text (e.g. because it touches on similar issues or provides useful background reading) and sustained critical discussion of an author's position or argument.

6. Research income plays only a marginal role for Philosophy in RAE2008. We believe that increased reliance on research income would achieve an outcome contrary to the REF's aim of funding 'excellent research in all its forms wherever it is found' (§9). The availability of large-scale research funding, in particular from the AHRC, seems likely to become more and more restricted to those areas deemed by the AHRC to be 'strategic priorities'. The inclusion of research income as a marker of quality, as in RAE2008, already provides an additional financial reward, via QR funding, for those units with substantial research income; increased reliance on research income would multiply this

effect and may well produce perverse behavioural incentives, e.g. appointment to academic positions based on whether a candidate's areas of research matches the AHRC's strategic priorities. This would be very damaging to the discipline of Philosophy within the UK.

7. The proposal to make the units of assessment larger than in RAE2008 poses further problems for the use of quantitative measures, since there are likely to be major differences in citation levels, research income, etc. between as well as within disciplines.

Consultation question 3b: What are the main options for the form and conduct of this review?

We believe that the primary focus of any review that determines QR funding for Philosophy should remain the intrinsic quality of the research, however it is carried out, wherever it is published, and whether or not it is externally funded. The current system of appointing respected academics to judge the quality of publications achieves this. Any 'structured reduction in the amount of reading done' would inevitably involve the use of journal rankings or citation indices, and we do not believe this would provide a reliable indicator of quality, for the reasons given above.

Consultation question 4: Is there additional quantitative information that we should use in the assessment and funding framework to capture user value or the quality of applied research, or other key aspects of research excellence? Please be specific in terms of what the information is, what essential element of research it casts light on, how it may be found or collected, and where and how it might be used within the framework.

For research in **applied philosophy**, there is some scope to consider not just the intrinsic quality of the research but the use to which it is put. This might include considering membership of national bodies such as the Food Ethics Committee, the Nuffield Council on Bioethics, the Human Fertilisation and Embryology Authority, etc. as genuine 'esteem indicators', despite the fact that their focus is not primarily philosophical. It might also include considering the impact of applied research on Government policy, e.g. in bioethics, medical ethics and the philosophy of education.

However we do not see any prospect of being able to use quantitative data to measure 'user value'.

Consultation question 5: Are our proposals for the role of expert panels workable within the framework? Are there other key issues on which we might take their advice?

The proposals are rather vague but seem broadly appropriate. However it is very important that each expert panel or sub-panel is discipline-specific, or at least narrow

enough to cover only disciplines that have similar cultures and research methodologies. The extent to which publications are covered by citation indices is especially important, since this may vary considerably between disciplines even within the arts and humanities (see Q6 below).

Consultation question 6: Are there significant implications for the burden on the sector of implementing our new framework that we have not identified? What more can we do to minimise the burden as we introduce the new arrangements?

The system of peer review for RAE2008 – where all 4 research outputs are read by the sub-panel – is time-consuming for the small number of academics who are panel members, and HEIs whose staff are panel members should be adequately compensated. However, the burden on HEIs for this aspect of RAE2008 was relatively minor.

It is entirely possible that the inclusion of citation index data would produce a massive overall increase in the amount of work involved. The ‘scoping study’ commissioned by Hefce shows Citation Index coverage for History, Philosophy and Religion to be only 27% in 2006. In other words, only 27% of works cited in publications covered by the ISI Citation Indexes themselves appeared in such publications. Thus in order to collect any remotely meaningful citation data, manual searches would have to be carried out on vast quantities of publications not covered by the ISI Citation Indexes, since clearly the overwhelming majority of work in History, Philosophy and Religion is to be found in such publications.

We would therefore urge HEFCE to consider very carefully whether the use of CI-based metrics would really decrease the burden on HEIs, and on academic staff in particular, of quality assessment.

Consultation question 7: Do you consider that the proposals in this document are likely to have any negative impact on equal opportunities? What issues will we need to pay particular attention to?

Point (3) in the answer to Question 3a is relevant here. Obvious examples of areas of philosophy that are likely to have low citation counts include feminist philosophy and African and Asian philosophy. While of course research in these areas is not in principle restricted to women or ethnic minorities, in fact the majority of researchers in these areas are likely to come from the relevant groups. (Certainly the overwhelming majority of researchers in feminist philosophy are women.)

Consultation question 8: Do you have any other comments about our proposals, which are not covered by the above questions?

It is unclear to us what the justification is for seriously considering a move to 'light touch' peer review supplemented by quantitative data. It seems highly unlikely that such a move would reduce the overall burden of the review process, given the difficulty of obtaining reliable citation data in disciplines, such as Philosophy, where CI coverage is very low. And there are good reasons to think that quantitative data would not only be unreliable, but would distort the research patterns of individuals and the hiring strategies of institutions in ways that would diminish rather than enhance the quality of research in Philosophy in the UK.