

Annex A

Consultation questions and response form

1. 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**.
2. All responses should be e-mailed to ref@hefce.ac.uk. **In addition:**
 - a. Responses from institutions in Scotland should be **copied to** Pauline Jones, Scottish Funding Council, e-mail pjones@sfc.ac.uk.
 - b. Responses from institutions in Wales should be **copied to** Linda Tiller, Higher Education Funding Council for Wales, e-mail linda.tiller@hefcw.ac.uk.
 - c. Responses from institutions in Northern Ireland should be **copied to** the Department for Employment and Learning, e-mail research.branch@delni.gov.uk.
3. 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. Equivalent legislation exists in Scotland.

Respondent's details

Are you responding: (Delete one)	On behalf of an organisation
Name of responding organisation/individual	British Philosophical Association
Type of organisation (Delete those that are not applicable)	Academic association or learned society
Contact name	Prof. Helen Beebee
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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.

No. We disagree with the following key features:

(a) the inclusion of impact as a measure of research excellence; and

(b) taking the inclusion of impact as given, we disagree with the proposals for how impact is to be understood, how it is to be assessed, and what proportion of QR funding is to be determined by impact.

(c) the merging of the Philosophy and Theology & Religious Studies UoAs. We agree wholeheartedly with the stated aims that UoAs will be 'at a level of detail that is useful ... for providing research management information to institutions' (§27d) and that the REF will be used to 'encourage desirable behaviours at three levels', namely the individual researcher, whole HEIs, and – in between the two – 'research units, as the level at which research is primarily managed' (§27f). However, the proposed merging of Philosophy with Theology and Religious Studies would render the REF incapable of meeting these aims, at least so far as those two disciplines are concerned.

Reasons for the above concerns are provided in our answers to specific questions below.

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.

- Institutions should select research staff and outputs to be assessed.
- Categories of eligible staff: We are concerned about the fact that outputs of staff on fractional appointments were counted, for the purposes of scoring, as though the staff were full-time. (So for example a staff member on a 25% contract could submit 4 items, and these were counted exactly the same as full-time staff). In our view, this is not appropriate when

the part-time staff member also holds an academic appointment elsewhere. Attempting to establish a 'connection' between the work of such staff and the submitted unit, as suggested in §34, is one possibility, but evaluating the evidence provided by the UoA would be an additional burden on panels, and claims made about the 'connection' would, at least in non-lab-based disciplines, be impossible to verify. It would be much easier – and, we think, fair – simply to *either* restrict the number of outputs such staff could submit (so that, e.g., a 50% staff member could submit 2 outputs, assuming a maximum of 4 outputs per staff member), or weight their outputs according to their % contract (so, e.g., a 50% staff member could submit 4 outputs but they would each be counted as 50% of an output).

- 'Confidential reports to business' should not, in our view, be permitted as outputs (§39): research that is not in the public domain should not be rewarded with QR funding.
- We are also concerned at the proposal that 'actual or potential use beyond the academic sphere' should be used as a measure of the quality of outputs (§39). Actual use beyond the academic sphere is already assessed via the 'impact' component of the REF; it is unclear how 'potential' use could meaningfully be measured, or why it should be thought to be a measure of the quality of an output.
- We are pleased that HEFCE does not expect that panels for disciplines like Philosophy would opt to use citation information (§45a), and indeed would strongly urge them not to.
- We recommend a maximum of 3 outputs per researcher. This will keep the required rate of publication as close as possible to that expected in the assessment period for RAE2008; it will also significantly reduce the workload of panel members.
- We agree with the possibility of double-weighting some outputs and are happy for the criteria and procedures for determining double-weighting to remain the same as for Main Panel N in RAE2008.

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.

Philosophical research in general, whatever its subject matter and intended audience, does make a difference – and has been doing so for over two and a half thousand years – and thus has impact in the broadest sense. Any philosopher will be able to provide examples of such impact, whether it is the concepts and arguments that underpin the fundamental principles of our own government (democracy, liberty, the social contract, rights), the foundations of modern logic that underpin all computer programming, or the influence of Peter Singer's *Animal Liberation* on the animal rights movement. Most generally, philosophical research makes available the resources, to anyone who is interested, for clarifying and answering the deepest

and most difficult questions we can ask about ourselves and our relationships with other people and the world at large. (Does life have a meaning or purpose? Does God exist? Are moral standards or truth relative to particular cultures? Do we have free will? And so on.)

So high quality philosophical research certainly makes a great difference, both to society at large and to the academic communities in which it flourishes. Examples such as those given above, however, show that much of the impact of philosophy cannot reasonably be assessed in the context of the REF, because they are often not directly attributable to particular researchers or units of assessment, and because they often unfold gradually over decades and centuries. Impact, we conclude, is neither a suitable measure of research quality, nor a predictor of its ultimate importance.

It is appropriate that philosophers working in HE institutions in the UK, whose jobs are partially funded by the taxpayer, should be able to show that – and how – our work makes a difference to the society that pays for us. Nonetheless, spending QR funds according to the assessment of impact risks actually reducing the quality of philosophical research. First, it puts pressure on philosophers to focus on research that has short-term, measurable impact at the expense of research that makes genuine, long-term progress in answering questions such as those mentioned above. And, second, it ignores the fact that impact often arises in unpredictable and unexpected places (as in the application of developments in logic – which occurred because philosophers were interested in abstract questions concerning the logical structure of natural languages – to computer programming).

However, we recognise that HEFCE's remit is to implement government policy, not to determine that policy. This being so, we would like to make some positive proposals, both for a broader understanding of 'impact' than is enshrined in the REF consultation document, and for a rethinking of the way in which impact is assessed for the purposes of the REF. If impact must be assessed in the REF, it should at least be assessed in a way that recognises and rewards the short-term effects that philosophy actually has on wider society (or at least those that can be attributed to particular researchers or unit of assessment), even if it cannot recognise or reward the much more significant and long-term effects philosophy has had, and will continue to have, over the course of human history. We therefore like to make some positive proposals, as follows.

1. The scope of 'impact'

The following list is not intended to be exhaustive, but rather to give a flavour of some of the main ways in which the work of philosophers has impact. Some items on this list are simply omitted from the consultation document; others are explicitly excluded; and others are implicitly excluded by the ways in which the consultation document suggests that impact be assessed.

We propose that all the items on the list should be explicitly counted as forms of impact in the REF (suitably generalised to cover other disciplines where impact of a similar nature is achieved), and that the ways in which impact is assessed as correspondingly amended (see §§2 and 3 below).

Impact in philosophy includes:

- (i) engaging in 'popular philosophy' via books, newspapers, radio, podcasts, public lectures and philosophy magazines aimed at a general audience;

- (ii) impact through teaching. 'Research-led' teaching is commonplace in philosophy, and thousands of students graduate from UK universities each year who have studied philosophy. This is a major way in which contemporary philosophical research is disseminated into the wider community, and into every walk of life in which philosophy graduates are to be found (politicians, civil servants, journalists, teachers, etc.).
- (iii) engaging in research that is directly aimed at policymakers and practitioners of various kinds (NGOs, health professionals, government bodies, etc.);
- (iv) bringing expertise to public and/or national bodies (e.g. ethics committees for organizations like the BMA, MRC, Nuffield Foundation, etc.);
- (v) international intellectual impact. The international reputation of particular UK philosophers and philosophy departments (and other units) is directly related to their research achievements, and has a direct impact on the UK economy by, for example, attracting overseas postgraduate research students; and by attracting overseas philosophers to spend sabbaticals and attend conferences in the UK. It also contributes to the good standing of UK universities on the international stage, as does the editing, in some UK departments, of major international philosophy journals.

A brief comment on (i) and (ii) is in order. The engagement with philosophical ideas and arguments by the general public must be recognised as a form of impact by the REF (and similarly, we believe, for other disciplines). To deny this is, we believe, tantamount to saying that the pursuit of knowledge for its own sake, by any individual, is unimportant, or is to be viewed as a mere leisure activity that is not essentially different from watching a gameshow on television or going to the pub.

Given that engagement with philosophy (or history, or physics, or whatever) by the general public must be recognised, research-led teaching must also be recognised, since this is a major way in which many members of the public are introduced to philosophy. However, the consultation document explicitly excludes teaching from impact at §53(b), except where research has 'informed practice, not just course content, well beyond the institution in which that practice was first developed'. We disagree very strongly with this proposal. Research has impact, in part, through the inculcation of knowledge and understanding in students; we therefore see no principled reason why research-led teaching should be excluded as a form of impact.

2. The use of 'case studies'

We are strongly opposed to the proposal that providing case studies be a requirement of REF submissions.

The proposal for case studies, we believe, enshrines an inappropriate conception of 'research', focusing on output to the exclusion of process. Research is, in the first instance, an activity, one outcome of which is the research output, in the form of a publication (in the case of philosophy). Other outcomes include verbal presentations, reports aimed at policymakers, better and more up-to-date teaching, and, importantly, a high level of expertise both in a particular area of philosophy and in the intellectual virtues of clarity, robust argument and critical analysis, which can be made use of in a variety of ways.

The kinds of outcome of research that have impact should therefore not be tied to specific publications in the way suggested in the consultation document. A philosopher who discusses philosophical issues on Radio 4, say, or who is a member of the ethics committee of a national body, may well not be disseminating any particular publication; they may instead be bringing their expertise – expertise that is itself an ‘output’ of the research process – to bear on the topic under discussion.

Merely requiring that those staff delivering impact have also submitted research outputs (not necessarily related to the impact being claimed) to the REF (or to previous RAEs) will suffice to make it extremely likely that the process of research that resulted in the impact was of a high quality. This would provide an indicator of research quality without requiring an inappropriately tight connection between particular publications and impact.

We propose that:

- (a) The provision of case studies be an optional element of the submission, with UoAs allowed to provide an ‘impact statement’ on its own if more appropriate;**
- (b) The standard template for case studies be made much less prescriptive, allowing the unit of assessment to describe and provide evidence of the impact in whatever way it deems appropriate (and in particular removing the requirement that specific publications be cited);**
- (c) Instead of requiring that impact be linked to a particular publication, it should merely be required that staff involved in the impact described in the case study are part of the UoA’s overall REF submission (i.e. their research outputs are assessed, etc.) or (where appropriate, depending on the case study) were submitted by the UoA to a previous RAE.**

3. Impact indicators

We note the lack of credible impact indicators applicable to arts and humanities disciplines in Annex D. In particular, under ‘cultural enrichment’, it is proposed that the level of impact is measured through surveys or feedback. This is of course practically impossible for many kinds of public dissemination, e.g. radio or television broadcasts. And under ‘other quality of life benefits’, HEFCE has not been able to think of any indicators at all.

We believe that the difficulty that HEFCE have had in producing credible indicators should be taken to be a very strong reason to think that robust indicators should not be required at all for some forms of impact. **We therefore propose that the inclusion of a fully specified menu of measurable indicators be abandoned in favour of the adoption of a less prescriptive model which would enable UoAs to present the evidence best suited for their specific form of impact.** This is not to say that there should be no evidential requirements at all; merely that the kind of evidence that is allowed should:

- (a) be weaker (so for example writing on philosophy in a national newspaper, or involvement in a discussion on national radio, should not require supplementation by any ‘survey’ or ‘feedback’; it can reasonably be assumed that a large number of people actually read the article or listened to the programme. Similarly, a rough indication of audience size might be a sufficient indicator in the case of a public lecture).

(b) not be specified in advance by the provision of a 'menu'. The provision by panels of guidance on what counts as impact, the requirement that evidence of some (perhaps fairly loose) kind must be provided, and perhaps some examples, should suffice.

4. Impact statements

As stated in §2 above, we believe that UoAs should have the option of supplying a narrative 'impact statement' on its own, without any case studies. And, as stated in §3 above, we believe that the notion of an 'indicator' be considerably weakened, and a 'menu' of indicators not be specified in advance.

In addition, we propose that the impact statement not be required to fit a generic template (Annex D, §3). The absence of a generic template in previous RAEs for statements on research environment and esteem has not, to our knowledge, proved to be problematic, and we see no reason not to follow this practice for the REF impact narrative as well.

5. The use of 'research users'

We are extremely concerned at the suggestion that 'impact submissions would be reviewed mainly by the user members' of panels (§96c). In the light of the list of the kinds of impact that philosophy has that can meaningfully be assessed in the context of the REF provided in §1 above, we believe that the use of 'research users' to help make the impact assessment, in the case of philosophy, (a) would be unnecessary and (c) could adversely affect the assessment, for the following reasons:

(a) We do not see the need to include users among the assessors of impact because we do not see what expertise they would bring to the panel. It might be that in some particular cases, there is scope for expertise to be brought to bear by users (e.g., say, a health care professional with knowledge and experience in a particular area, who is in a good position to evaluate the usefulness of research for which impact is claimed). However, this particular expertise will not translate into a general expertise to evaluate other forms of impact, and it would therefore be inappropriate for this particular person to be involved in assessing other impact statements.

In other cases, it is unclear that there is any relevant notion of expertise that research users could meet. In the case of dissemination of philosophy to the general public, for example, it is unclear what could count as expertise at judging the impact or importance of an activity for which impact is claimed.

(b) The inclusion of research users on the panel could adversely affect the robustness of the assessment of impact. This is partly because expertise in one relevant area will not translate to expertise in others, as just mentioned. But it is also because part of the job of the panel should be to judge the quality of the research for which impact is claimed (see §2 above). This is something that philosophers are uniquely qualified to judge; non-philosophers should therefore not be involved in making such judgements, let alone the primary source of such judgements.

We therefore propose that 'research users' be restricted to a 'specialist advisor' role, similar to that already used in RAE2008 for the assessment of outputs that fall outside the expertise of panel members. Users who are specialists in particular fields could be called upon if the panel judges that their expertise might usefully inform their judgements concerning specific elements of individual impact submissions.

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

We are extremely concerned at the proposed categorisation of research environment into 'Resourcing', 'Management', and 'Engagement', for two reasons:

(a) Several of the elements listed under 'resourcing' and 'management' seem to us to be insufficiently relevant to the actual research environment that exists within a particular UoA. In particular, 'strategic aims and goals', 'forward plans', and 'how research is structured and managed' are effectively *mechanisms* for achieving an excellent research environment; to assess research environment on the basis of the existence of such mechanisms is thus to measure something other than the quality of the research environment itself.

It is not clear what underlies this shift in focus. The quality of the research environment is something that can be directly assessed, via the provision of information about the actual activities that are undertaken within the UoA (as in previous RAEs). So there is no need to replace information about the actual environment with generic information about policies, 'forward plans' and strategies – information which may or may not be correlated with the actual quality of the environment.

For example, in philosophy (in common, of course, with other disciplines) the quality of the research environment depends, in part, on the existence of a lively research culture: regular guest seminar speakers, international conferences, the editing of major international journals, and so on. What is of primary importance is which activities actually take place, not having a 'policy' or 'strategy' concerning such activities.

In addition, we are concerned that the proposed changes to both the content of the required information about research environment and to its presentation (via a generic template) will impose an additional burden on institutions. UoAs generally have a good understanding of what was required in RAE2008; requiring something similar for the REF will allow UoAs that scored well in RAE2008 to use their previous environment narrative as a template for the REF narrative. The proposals in the consultation document effectively mean that all UoAs will have to start from scratch, both having to provide different information and having to provide it in a different format to RAE2008.

(b) We do not agree with the proposal that 'engagement' be a sub-category of research environment. Arrangements for the support of staff working with research users, engagement with the public, etc., should be covered in the impact statement, insofar as HEFCE believes that the management of impact-related processes needs to be assessed in addition to actual impact itself. Including it as a sub-category of research environment in effect illicitly increases the proportion of research funding that is distributed on the basis of impact.

We therefore propose that (a) research environment is assessed in a way that is much more similar to RAE2008, and (b) 'engagement' be removed from 'research environment'.

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.

No. **We recommend: Outputs: 75%, Impact: 10%, Environment: 15%.**

The reasons for this are as follows:

(a) The impact component is new and untried, and there will be relatively little time before the publication of the final REF criteria and the submission deadline for staff to tailor their activities accordingly. It is therefore inappropriate to determine a relatively high proportion of QR funding on the basis of impact, at least in the first run of the REF. The effects of the impact component – on the behaviour of researchers, on the quality of research, and on the funding of units of assessment – should be carefully analysed by HEFCE, in consultation with the academic community, before considering increasing the proportion allocated to impact above 10%.

(b) The consultation document appears to appreciate that relatively small numbers of researchers will contribute to the impact score (cf. the proposal that there be one impact case study per 5-10 members of staff). Weighting impact above about 10% will therefore mean that a small proportion of researchers will determine a relatively large proportion of QR funding. E.g. assuming all submitted researchers contribute equally to the output and environment scores, and assuming only 1 in 5 contribute to the impact score, 20% of researchers will be responsible for 45% of the total QR funding (= 20% of the output and environment scores + 100% of the impact score, i.e. a further 25% of the overall score).

(c) The amount allocated to research environment in RAE2008 was 80% within Main Panel N. The institutional focus has been on producing outputs of the highest possible quality, given their importance in previous RAEs. Significantly shifting the focus away from outputs at such a late stage will not give institutions or individual researchers time to modify their behaviour accordingly.

(d) It will be very difficult for early career researchers to demonstrate impact. Departments with a high proportion of ECRs will therefore be adversely affected by the inclusion of the assessment of impact; substantially reducing the % devoted to impact will not remove this bias, but it will reduce its effect.

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.

We do not oppose the existence of a sub-panel dealing with Philosophy, Theology and Religious Studies ('PTR') *per se*. However, we are very strongly opposed to the suggestion that there should be a corresponding merger of the Philosophy and T&R units of assessment. We urge HEFCE to consider this matter very carefully, in the light of the following points:

(a) We appreciate that the REF is, in the first instance, a mechanism for distributing QR funding, and that from this narrow perspective, merging of UoAs will have little or no effect on the overall distribution of funds. However, as HEFCE is aware, institutions rely on the information provided by RAE results, at the level of individual UoAs, to a very great extent when making strategic decisions about investment and disinvestment; indeed, one of the listed 'key features' of the

REF is that UoAs are 'at a level of detail that is useful ... for providing research management information to institutions' (§27d). It is possible to act on the basis of information provided by the RAE results in an informed and meaningful way because to a great extent the existing UoAs correspond to internal institutional units (in our case, philosophy departments). Merging UoAs across the boundaries of institutional units will massively reduce the quantity of meaningful information on the basis of which institutions can make such decisions. For example, an averagely-performing PTR UoA might be the result of an excellent philosophy department and a below-average T&R department, or vice versa. It will be extremely hard for the institution to be able to extract this information from the REF result, and therefore extremely hard for it to make decisions about how to improve its performance in the future. The problem would not be so severe if philosophy and T&R were often located within the same School; however there is a huge diversity of groupings at School level across the UK; indeed in some cases Philosophy and T&R are not even located within the same Faculty.

We note that the consultation document describes as one of the 'key features' of the REF is that it will be used to 'encourage desirable behaviours at three levels': the individual researcher, whole HEIs, and – in between the two – 'research units, as the level at which research is primarily managed' (§27f). There simply is no grouping of philosophy with some other specified discipline that would correspond, nationally, to a 'level at which [philosophical] research is primarily managed'. The proposed merging of philosophy with any other UoA would, in effect, render the REF incapable of 'encouraging desirable behaviour' at any level in between the individual researcher and the whole HEI.

(b) The existing UoAs also make it possible for individual UoAs to have a high level of control over their own research strategies and activities when aiming to maximise their RAE score and/or QR income: individual departments are directly responsible for their RAE results and are able to respond accordingly. UoAs that are, from both an institutional and intellectual point of view, largely arbitrary mergers of disciplines that often have no institutional or intellectual cohesiveness may well lead to individual academics and departments feeling that their REF score is something for which they bear very little responsibility, particularly where there is a large disparity in size (e.g. a small philosophy department and a large T&R department).

(c) RAE results are also used outside institutions by, e.g., prospective postgraduate research students, as a measure of the research quality of departments. Again, this will not be possible with merged UoAs.

(d) We understand that the main driver for merged UoAs is efficiency of the assessment process. We fail to see how the merger of UoAs could achieve this result. We know that the overwhelming majority of the workload for panel members in RAE2008 was due to the rating of individual outputs. This will not be affected at all by merging UoAs, so any increase in efficiency from HEFCE's side will be at best minimal, resulting from (roughly) halving the number of UoAs for which environment and impact scores need to be given.

At the institutional level, however, there would be a very considerable increase in workload resulting from having to submit combined narratives on environment and impact. Again, the fact that Philosophy and T&R rarely have much contact – in either institutional or intellectual terms – means that from an administrative point of view, separate REF submissions would be much

more straightforward. Merging UoAs risks making the administrative burden on individual departments even more onerous than for previous RAEs.

The consultation document states that substantially reducing the number of UoAs will 'reduce the complexity for HEIs of responding to different criteria, and reduce tactical decision-making about which panels to submit to' (§122a). We do not believe that the 'complexity' of different criteria was a major issues for HEIs in RAE2008; most of the relevant work was done at the level of individual UoAs, and so having more generic criteria would make very little difference here. As far as tactical decision-making is concerned, where this will have been an issue for some individual philosophers, the number will have been extremely small. Moreover, given the diversity of subject areas that overlap with philosophy, merging philosophy with any other particular discipline would affect only a small proportion of that already small number of philosophers.

(e) Finally, we note that the consultation document describes UoAs as 'coherent research disciplines' (§87). There is no coherent research discipline that is Philosophy, Theology and Religion, and there has not been one for a good 250 years. There are points of intersection – e.g. in philosophy of religion and philosophical theology – in some, but by no means all, HEIs; but, nationally, no more than there are between Philosophy and, say, Psychology or English or Mathematics or any one of a number of other disciplines. If the aim of the REF is to assess coherent research disciplines, it MUST respect existing disciplinary boundaries and not arbitrarily combine disciplines.

We therefore recommend that, even if panels are merged, there is no corresponding merger of units of assessment, in those cases where the result of such a merger would not be a 'coherent research unit'.

Please note that the above comments are not especially aimed at the proposal to merge the Philosophy UoA with Theology and Religious Studies. The same basic points would apply whichever UoA Philosophy were merged with. From both an institutional and an intellectual point of view, merging Philosophy with Music or English or History or Classics would be neither more nor less arbitrary than merging it with T&R.

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

We agree with the proposals, except for the proposal that the role of research users be consistent across all panels (§100c). The role envisaged by HEFCE for research users may be appropriate for some disciplines; however, as indicated in the answer to Q6 above, it is not appropriate for philosophy (and of course the same may apply to some other disciplines). Experts in individual disciplines (or relevantly similar groups of disciplines) are best placed to determine what role, if any, research users can usefully play in determining judgements about impact, and should therefore have the final say in how research users are made use of within the panels. **We therefore propose that the role of research users be determined by individual panels.**

We would also like to comment on the proposal made in §99c, concerning the 'consistent application of internationally benchmarked standards of assessment'. We note that there was

considerable variation between disciplines in the national average score (e.g. 3.01 for Economics and Econometrics, compared to 2.17 for European Studies). We are not confident that this variation is a reliable indicator of genuine differences between disciplines in their international standing; but, of course, it should be. We would like HEFCE to think creatively about ways in which this might be achieved, particularly given that bibliometric indicators are unreliable in the arts and humanities and therefore cannot be used to make comparative judgements between arts and humanities disciplines on the one hand and the sciences on the other.

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.)

We have responded separately to a letter from HEFCE on this issue.

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?

We would like to make the point that combining the Philosophy UoA with any other particular UoA (whether this is Theology and Religious Studies or some other discipline) will have at best a marginal effect on the assessment of interdisciplinary research. This is because interdisciplinary research in philosophy is extremely widely dispersed across the full range disciplines (including, in RAE2008, law, psychology, health sciences, English, and politics).

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?

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

No.

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

We are concerned about the relatively short amount of time in between the publication of panel criteria (2011) and submission (2012), particularly given the introduction of impact as an element of submissions. We envisage significant changes in HEFCE's plans for the criteria for the assessment of impact, and (for reasons given above) hope that individual panels will be given more flexibility in determining impact criteria that are appropriate for the disciplines they will be assessing. This would give institutions very little time to act on concrete information about the assessment of impact. **We therefore propose that submission to the REF be delayed until 2013.**

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

No. As already stated, we disagree very strongly with the claim that reducing the number of UoAs by merging panels will constitute a reduction of the burden on HEIs. We also believe that the proposed changes to the content and format of the 'research environment' submissions will place additional and unnecessary burdens on HEIs.

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