

#	Response
1	If the UOA structure is relevant to you/your organisation, please indicate clearly any changes that you propose to the UOA structure and provide your rationale and any evidence to support your proposal. - changes UOA
2	no reponse
3	Our disciplines are not represented by any 4 star journals. Neither Human Resource Development nor Higher Education have any 4 star journals. We need equal recognition for publishing in the best journals in our fields. The best HRD journals are star journals. Why can't citations not also indicate impact?
4	<p>I am very impressed by the lengths that the REF has gone to assess and reward interdisciplinary work.</p> <p>However, I would like to highlight that the current UoA structure in general does not recognize the importance of methodology and technology. Advances in methodology (e.g., statistics) and technology (e.g., software) can have tremendous impact on many other fields while failing on the REF criteria of originality in their own field. Assessing and rewarding such research could substantially improve the UK's research ability.</p>
5	<p>UoAs should be submitted.</p> <p>If less UoAs are submitted, this encourages divestment in some subjects.</p>
6	<p>UOA structure does not reflect multi and cross disciplinary work well and we are encouraged to prioritize outputs to meet the 'employing' UOA.</p> <p>The dominance of senior academics with secure employment and jobs that often do not resemble those of the majority early and mid career research skews the UOA 'worldview' in ways that are not always beneficial to research or people's lives.</p>
7	What will be done to mitigate the lack of "four-star" publications in some fields, as compared to traditional fields, such as Economics and Accounting?
8	There needs to be consultation with nurse, midwife, allied health professions and related practice based disciplines in UoA3, and check whether their fit next to biomedicine (e.g. genetics, drug design/production) continues to be fit for purpose. These non medicinal disciplines have significantly matured their research communities since RAE/REF started and they are also now recognized as underrepresented group national by NIHR and NHSE. It follows that focusing exclusively on them to better enable assessment to reflect their specific nuances at this stage in the sector development is warranted (or at least needs to be looked at). [REDACTED] I and other felt there was an opportunity to narrow this panel considerably as it had become very broad in nature.
9	Current status works fine.
10	I disagree. Especially, the Units of Assessment in natural sciences are too general and unable to airily evaluate the unit research strengths. This must be divided into smaller units according to subjects.
11	<p>The decision to retain the REF 2021 Unit of Assessment (UOA) structure while inviting input from disciplinary communities and institutions reflects a commitment to maintaining a relevant and adaptable evaluation framework. This approach recognises that research landscapes are dynamic, with disciplinary developments that might necessitate adjustments to accurately capture the diverse contributions and impact of different fields.</p> <p>The benefits of retaining the existing UOA structure include consistency and continuity, which allow for meaningful comparisons and benchmarking across assessment cycles. However, it's equally important to remain responsive to changes within disciplines to ensure that the UOA structure remains reflective of the evolving research landscape.</p>

	<p>Disciplinary developments since REF 2021 could encompass a wide range of factors, such as emerging sub-disciplines, interdisciplinary collaborations, technological advancements, and shifts in research priorities. Here are some considerations for potential changes to the UOA structure based on disciplinary developments:</p> <p>Emergence of New Fields: If new disciplines or sub-disciplines have gained prominence since REF 2021, creating dedicated UOAs could better capture their unique contributions and challenges, e.g. The use of emerging and disruptive dual use technologies..</p> <p>Interdisciplinary Research: If there's an increase in interdisciplinary research, UOA boundaries might need adjustment to accommodate collaborative efforts that span multiple traditional disciplines.</p> <p>Technological Advancements: Rapid advances in technology could lead to the creation of novel research areas that don't neatly fit into existing UOAs.</p> <p>Changing Research Priorities: If there has been a shift in research priorities due to global challenges or societal needs, adapting UOA boundaries could ensure that assessment aligns with current research directions.</p> <p>Cross-Cutting Themes: If certain themes or research topics cut across multiple disciplines, UOA structures could be revised to facilitate comprehensive evaluation of these themes.</p> <p>Global and Regional Trends: Consideration should be given to disciplinary trends that might vary across regions and nations, ensuring that UOA structures remain relevant in diverse contexts.</p> <p>Inclusivity: UOA structures should accommodate diverse research contributors, including non-academic innovators and individuals from underrepresented groups, to reflect the broader research ecosystem and whole system operations.</p> <p>Engaging with disciplinary communities and institutions is crucial in this process. The insights, expertise, and experiences of researchers, practitioners, and institutions are essential in identifying the need for potential changes to the UOA structure. Feedback and collaboration will ensure that the UOA structure accurately represents the research landscape and continues to support fair, transparent, and credible research assessment.</p> <p>Overall, the combination of maintaining continuity and remaining adaptable to evolving research dynamics will contribute to a research evaluation framework that effectively captures the impact and contributions of various disciplines.</p>
12	I would just say that Education Studies, as a multi-disciplinary area, appears to suffer from the level of specialism of reviewers.
13	I would welcome the development of a new criminology subpanel to reflect the interdisciplinary nature of this subject area, much as for example in the case of education and business and management, both of which have standalone panels. Criminology is distinct from the constituent base disciplines with which it intersects (e.g. business & management, law, sociology and forensic psychology) and a specialist subpanel would be highly beneficial. Otherwise, I am satisfied with the present arrangements.
14	Not applicable
15	We support the proposal to retain the REF2021 Unit of Assessment structure for REF2028. In fact, it would be detrimental to Portsmouth's research environment to further

	consolidate UoAs, after the consolidations made for REF2021. For example, retaining Area Studies as a separate UoA from Modern Languages is of vital importance as these operate as methodologically distinct areas of research and learning at Portsmouth as much as elsewhere. In preference to such consolidations, the boundaries of UoAs should remain as porous as possible and to allay fears of fit-to-UoA limiting inclusion in REF. Portsmouth is justly proud of its 'research power', achieved in REF2021 from broad inclusion of the work of its research active staff in REF. In that respect, the UoA structure should support the further development of such inclusivity and associated 'research power', by emphasising the porousness of UoA boundaries and mechanisms for cross-referral rather than consolidating Units of Assessment
16	Certain subjects (film and photography come to mind) are split across more than one UoA and this is not ideal.
17	The existing structure is fine from my perspective.
18	N/A
19	N/A
20	It would be helpful if you could have a look at where staff have been submitted outside their disciplines in the previous REF round, and consider the impact of this on disciplines and departments.
21	I am aware that Theology and Religious Studies is small, but also dominated by Theology and Biblical Studies over Religious Studies, which is further dominated by Sociology of Religion. The BASR would be open to merging TRS with, or splitting it between, other UoAs.
22	We welcome consistency and continuity of the panel and UoA structure from REF 2021.
23	The Association of Southeast Asian Studies UK supports the Future Research Assessment Programme (FRAP's) proposal that "REF 2028 will retain the REF 2021 Unit of Assessment structure and will include advisory panels on Equality, Diversity and Inclusion, and Interdisciplinary research" (REF 2028: Initial decisions and issues for further consultation, REF 2028/23/01, p.25) in particular with regard to arrangements for UOA 25 Area Studies.
24	The structure seems appropriate as is, and by staying the same it provides some continuity from REF 2021 and understanding of the groups of disciplines that make up a UoA .
25	The Initial Decisions document talks of the 'disciplinary groupings' within an institution but such groups rarely align to the deterministic structure of the UoAs.
26	No feedback on this aspect
27	The structure is relevant, and we do not propose any changes.
28	So long as REF takes a catholic view around the edges, we think the units are now well-established, and some certainly as to what we are (particularly in federated disciplines such as Art and Design and Area Studies) would be good.
29	We do not propose any changes to the UOA structure. We would welcome confirmation of maintaining the REF2021 UOAs as early as possible to support planning, staff UOA alignment and consideration of potential new UOAs for submission.
30	<ul style="list-style-type: none"> • We support the continuation of the REF2021 UoA structure. However, there are concerns about the amount of work that UoA33 needed to undertake, when compared with other panels.
31	The REF panel membership is mainly from academia. It would be worth considering if panels for UoAs 1 and 2 should include more NHS staff to increase a focus on and reward to research of most use to the NHS.
32	There are, in our view, no compelling reasons to change the UOA structure. However, we very much welcome the continuing openness of the sub-panels to receive the full breadth of research within their subject remits, and that this be reflected in sub-panel membership.
33	Structure is less of a problem than allocation of outputs and case studies. More guidance here would be useful.

34	<p>We support the published UOA Structure and welcome the fact that there is stability in UOA structure since 2021.</p> <p>Note that there are a number of typographic errors in Annex C: Unit of Assessment structure for REF 2028 of the Initial Decisions document, Page 33.</p>
35	We do not propose any changes to the UoA structure.
36	<p>CUCD is very pleased to see the continued existence of a dedicated Classics sub-panel. It remains crucial that a subject area with so many distinctive and interdisciplinary fields has a broad coverage of those areas, something that is only possible within a dedicated sub-panel. Classics, Ancient History, Classical Archaeology and Classical Reception, not to mention Byzantine and Hellenic Studies, continue to grow in diversity and range, incorporating a wider range of cultures and periods. Time is needed to see how the new reduced impact case study requirements affect the number of submissions to the sub-panel.</p>
37	<p>We are content with current structure. In particular our experience with both the single Engineering unit and the Criminology flag from 2021 were positive.</p> <p>Is IDAP still necessary following reflections that all sub-panels are very comfortable with interdisciplinary research?</p>
38	<p>o RCM is happy with the existing UoA arrangements for Music and the other performing arts, providing that the existing robust arrangements for interdisciplinary research and cross-referral between subpanels are retained.</p> <p>o RCM shares the concern of other specialist performing arts institutions that the UoA structure from REF2021 produces serious imbalances in the size of disciplinary fields represented by the different Main Panel D subpanels. This presents a real risk of unfairness across the different disciplines, as individual subpanels have to grapple with widely varying assessment loads. We wonder why some subjects are deemed to merit multidisciplinary panels, and others not. This is ultimately a question of whether or not the panel structure is equitable, and whether it is perceived to produce fair outcomes across the different disciplines.</p>
39	<p>AHPD notes that this issue continues to spark considerable debate among our members because Psychology is a pluralistic discipline with many sub-specialties. Some of our members feel strongly that there should be a separate panel for Psychology and others noted the merit of remaining in a joint panel, given the number of Psychology staff undertaking collaborative research with allied disciplines and/ or working at the intersection of Psychology and Neuroscience. On balance, AHPD agrees that fair and discipline-specific consideration of submissions should be undertaken at panel level, with appropriate representation of Psychology sub-disciplines, research methods and approaches, and not through potentially counter-intuitive splitting of panels.</p>
40	<p>No changes are necessary. We would strongly favour the retention of an Area Studies Unit of Assessment and would encourage the unit descriptor in that area to remain alive to changes in disciplinary approaches.</p>
41	Film and Screen Studies to be taken from 33 and added to 34.
42	a. We propose no changes to the UOA structure.
43	<p>None proposed. We would not wish to see changes to the UoA structures and welcome the stability.</p> <p>However there is a disproportionate workload for sub panel members in the current structures and this may lead to inequities in the process. Combining panels is equally problematic given some of the issues already identified with HESA data above.</p> <p>It may be advisable to have a generic arts and humanities sub-panel for small generalised units and then combine other sub panels to ensure greater equity. This panel might also address some of the interdisciplinary assessment in addition to small units and have a slightly different and more experienced constituency.</p>

44	<p>We support the proposed UoA structure in so far as it concerns the socio-legal field. The work of the majority our members and the wider community has been very well accounted for and assessed through law sub-panels in REF 2014 and REF 2021. We are keen for this continue. We note also that a significant number of our members are located in non-law departments. This is particularly true given the inherently interdisciplinary nature of socio-legal field. We are strongly supportive of any strengthening of systems for cross-referral, use of external expertise, and sensitization of panel members (and their selection) with a view to cross-, multi- and interdisciplinarity.</p>
45	N/A
46	<p>There has been a change to the name of UoA A6 from Agriculture, Food and Veterinary Science to Agriculture, Food and VETINARY SERVICES [change denoted in capitals].</p> <p>Aside from the incorrect spelling of Veterinary, the change from Science to Services has implications on the type of work that could/should be included and would potentially reduce the number of eligible case studies. Please can the spelling be corrected and the theme returned to "...Veterinary Sciences".</p>
47	<p>The University of Kent is disappointed to note that no changes have been proposed with respect to the UoA structure since we have the following concerns:</p> <p>1. Sensitive and vulnerable disciplines: Disciplines such as those submitting to UoA 33 (Languages and Literature) are likely to continue to experience severe challenges throughout the REF cycle in all but Russell Group institutions. For this reason, where relevant non-Russell Group institutions are likely to face significant issues on account of there not being a multidisciplinary UoA to complement UoA 33. The same is likely to be true in disciplines such as Philosophy (UoA 30) and Religious Studies (UoA 31). It is therefore recommended that the UoA structure is revisited to create a small number of more inclusive cross-disciplinary UoAs to support particularly vulnerable disciplines.</p> <p>2. Uneven workload for REF panels: The existing UoA structure continues to perpetuate the disparity that will be created by small units. It will generate unacceptable inequalities in workload between sub-panels (with EDI issues for over-burdened panel members) and risks of credibility to small panel calibration.</p>
48	<p>We recommend that continuity should remain as far as possible: major reconsiderations at this stage are problematic as we are already three years into the REF cycle. Developments in the disciplinary area (the diversification of languages, the decolonisation of the subject area, the more global nature of the disciplinary field) should be reflected in the descriptors of the UOA and in the panel membership. It would be good if the excellent working relationship that was established between Panels 25 & 26 could be formalised going forward.</p> <p>With the closure of some Modern Languages departments, researchers may be submitted to other UOAs, such as 27. Formal recognition of the artificiality of some of the distinctions between UOAs would be helpful. Linguistics, for example, falls across multiple panels.</p> <p>For REF2021, Panels had a good working relationships and good systems of cross-referencing, this should be maintained, with relationships between particular panels acknowledged as appropriate.</p>
49	<p>As the study association of one of the largest contributors to UoA 25 (Area Studies), we are very positive about the retention of this UoA. The outcomes from REF2021 reflected the added value of a UoA that is intrinsically interdisciplinary and so which could not reasonably be folded into other UoAs. The collapsing of regional area studies UoAs into a single sub-panel in REF2021 has produced a critical mass and has stimulated more interaction, which is</p>

	likely to be reflected in the production of more highly-rated research and impact activity. We also support the proposed retention of the advisory panels on Equality, Diversity and Inclusion, and on Interdisciplinary Research.
50	• There are, in our view, no compelling reasons to change the UOA structure.
51	We do not see a need for any changes to the current UoA structure or the UoA descriptors.
52	<p>o Submitting to subpanel 33 we felt confident that the interdisciplinary research across the performing arts could be assessed through the multidisciplinary panel and have welcomed the close working relationships that the bringing together of Music, Drama, Theatre, Performance Dance, Film and Screen Studies has allowed.</p> <p>o Should the UoA structure remain as per REF2021, panels need to be resourced with resource recognising the very different scales of the units of Main Panel D. The workload must be consistent for transparency and equality. It feels important to note the implications in burden for the subpanels as well as the institutions of the measures proposed.</p> <p>o What is proposed here is a very different exercise from REF2021 and we would urge that the funding bodies ensure appropriate and measured training for the subpanels.</p>
53	Members of our community are in favour of retaining the REF 2021 Unit of Assessment structure, as chemistry is a well-defined subject area and UOA. This aligns with our response to the FRAP consultation [https://www.rsc.org/globalassets/04-campaigning-outreach/policy/uk-research-funding-policies/rsc-frap-consultation-response-2022.pdf]; “any change in granularity would need to be supported by evidence that there would be a substantial benefit, as it would require a lot of effort and resource to implement.”
54	<p>o The cross-disciplinary constitution of UoA33 in REF2021 and UoA35 in REF2014 has generally been regarded as successful. From this point of view, we have no objection to retaining the REF2021 UoA structure for our disciplines.</p> <p>o In retaining the wider UoA structure from REF2021, however, REF2028 would perpetuate serious imbalances in the size of disciplinary fields represented by the different Main Panel D subpanels. The quantity of work assessed by the different MPD subpanels in 2021 differed drastically, and the slightly differing sizes of the subpanels did not compensate for this. We wonder also why some subjects are deemed to merit multidisciplinary panels, and others not. This is ultimately a question of whether or not the panel structure is equitable, and whether it is perceived to produce fair outcomes across the different disciplines. All panels should be able to give equal attention and thoroughness to their work.</p>
55	<p>We are unsure as to why some small subjects are assessed individually in the REF (such as Classics in UOA 29) while others are evaluated in multi-disciplinary panels. The merging of several panels for REF2021 certainly placed some smaller disciplines in a difficult situation, because disciplines such as music and drama that were working entirely separately within an institution, and had previously been assessed within separate UoAs, had to make a case to be allowed to make separate submissions within UOA33 in REF2021. The resulting lack of continuity across institutions (partly caused by the fact that not every institution had departments in all the disciplines encompassed within the UOA, and partly because some made combined submissions while some made separate submissions) made it impossible to compare REF outcomes between institutions for UOA33. From that perspective, it is disappointing to see that there will be no revisions to the UOA structure for REF2028. It is not clear what is gained by having panels that combine disciplines, since the vast majority of the work carried out is at discipline level (i.e. the reading and grading of outputs).</p> <p>§28 (p. 6) indicates there will be a refreshed approach to panel appointments. There is a strong feeling in our discipline that panel appointments have not always reflected different subdisciplines adequately, particularly in composition and practice-based research, where panel members need to be able to evaluate a wide range of different output types. This is</p>

	exacerbated by the small size of panels since UOA33 was created. The point made here is about including measures to support EDI, and it is to be hoped that equality, diversity and inclusion extend to disciplinary differentials alongside other important criteria.
56	<p>The outputs of humanities researchers in architecture are submitted in either UoA 13: Architecture, Built Environment and Planning; or in UoA 32: Art and Design History Practice and Theory. Main Panel C (UoA 13) and Main Panel D (UoA32) are embedded in very different research cultures and consequently have radically different output formats and output assessment criteria. Humanities researchers in architecture typically collaborate in two very different directions. They either collaborate with the planning technology and material science disciplines or with the design disciplines that produce multi-component outputs involving fine art and design, performance, creative writing, and what used to be called ‘the arts of building’.</p> <p>The AHRA do not have a problem with the current the UoA structure as it stands, but HEFCE need to establish more flexible and transparent procedures for cross referral of outputs, so that humanities outputs submitted with UoA 13 are assessed with Panel D criteria which are informed by the arts and humanities and not by Panel C criteria, which are informed by the social sciences; and technology outputs submitted with UoA 32 are assessed by Panel C criteria. At the moment, the two Main Panels seem to be relatively siloed. There is no reason why – in an assessment procedure with claims to universality – the criteria cannot be matched to the form of output, irrespective of which Panel it sits under.</p> <p>More generally, if HEFCE wants to encourage interdisciplinary collaborations and outputs that do not conform to the research journal formats and media, it needs to be more proactive in specifying types of acceptable outputs and output formats. Maybe a few worked examples chosen from the best of 2021? These would serve as a guide for the selection of submissions by Institutions and as a guide for their subsequent assessment by the Sub-Panels.</p> <p>As it stands, the differences in Main Panel assessment criteria and in the acceptable forms of outputs is particularly divisive in architecture research. The AHRA would strongly encourage that either the assessment criteria between different panels should be brought in line with each other, or at the least that the cross referral process be made more open and transparent to Sub-Panels.</p> <p>We support the full implementation of EDI policies and standards across the Main Panels and Sub-Panels, which are intended to embrace those of diverse genders, races, and religions, “those with protected characteristics or other underrepresented groups” (i.e. also including “marriage and civil partnership, pregnancy and maternity”).</p>
57	<ul style="list-style-type: none"> • Psychology, Psychiatry, and Neuroscience can be quite distinct - I would argue that, at the very least Psychiatry (as a medical degree) should be in a different UoA than Psychology, perhaps clinical medicine? • Where there are instances where impact case studies stretch beyond the unit of assessment boundaries, could this be cross-referred?
58	<ul style="list-style-type: none"> • Institutional Environment statement: We recommend that this is not scored and therefore does not count towards the score of individual units of assessment. • Multiple submissions: We have welcomed the ability to make multiple submissions to one UoA and would appreciate the ability to do this in REF2028.
59	We are writing on behalf of our members because we are concerned about the lack of a clear home for ecological research in any one of the REF 2028 Unit of Assessment descriptors (UoAs). We propose to adjust one of the descriptors of the UoAs to make it an

	<p>obvious home for the subject, with an appropriate quantity, quality and breadth within the components of ecology in its panel membership.</p> <p>This is particularly important because ecology is a crucial discipline to address the twinned climate and biodiversity crises, one of the main priorities of our time for research and policy action. A recent article published in Nature shows that we have already exceeded most of our planetary boundaries, with potentially dramatic and unpredictable consequences (see https://www.nature.com/articles/s41586-023-06083-8). A strong and vibrant ecological research community will help society address these significant challenges.</p> <p>A few months ago, we published a report that identified the strategic priorities for ecological research in the UK for the coming decades, which are needed to identify, reduce and respond to growing environmental risks and adapt to the changes that are already happening in our ecosystems and their habitats (see https://www.britishecologicalsociety.org//wp-content/uploads/2023/03/BES_Future_of_Ecological_Research_Report.pdf).</p> <p>For ecology to develop these strategic priorities, it is important that ecological research is well financed, and REF 2028 needs to play a key role in this process.</p> <p>We think the current proposals for REF 2028 are detrimental for ecology. For example, UoA12 (Earth Sciences) tends to focus on larger research areas around, for example, climate change, and, for this reason, an ecologist in an institution that submits under this UoA, but is not working on big environmental datasets, will score lower than in an institution submitting to UoA14 (Geography and Environmental Studies).</p>
60	interdisciplinarity research might not fit well across UoA boundaries, and the concerns remain that the ability to recognise interdisciplinary work is diminished.
61	No response
62	<p>Health services research has been defined as the discipline which seeks to ‘identify the most effective ways to organize, manage, finance, and deliver high quality care; reduce medical errors; and improve patient safety’. As the health care system grows more complex and more fully integrated with other aspects of public services (such as social care and education), it increasingly involves different disciplines and draws on a very wide range of methods.</p> <p>At present, health services research is specifically named in the descriptor of UoA2, although health service researchers are often returned in other UoAs, including those related to social policy, management and nursing.</p> <p>In UoA2, health services research sits alongside public health and primary care, and there is a perception that UoA2 returns are dominated by certain methods (especially trials and large dataset analyses). There is a risk that, in the context of such dominance, the wider suite of methods used in health services research (such as qualitative research and non-experimental evaluation) may be downgraded in the REF process or may be filtered out by institutions prior to submission because of assumptions about how they might be assessed.</p> <p>We think it is appropriate that REF allows flexibility in terms of where health services research is returned, and do not think that a fundamental change to REF structures is required.</p> <p>However, to better reflect the contribution of health services research, we suggest:</p>

	<p>1. Specific attention to health services research expertise on UOA2 panel, matching in terms of numbers/proportion those from public health and primary care, to ensure that returns are assessed appropriately and open to diverse methods, including qualitative research, implementation science and policy research.</p> <p>2. Ensuring health services research expertise on other panels, to ensure appropriate assessment of submissions across the wider UoAs, with appropriate cross referral to UoA2.</p>
63	No changes to the current structure are proposed.
64	None.
65	We support the current UoA structure; although, combining some cognate UoAs may promote more interdisciplinary working.
66	Maintaining the UoA structure is appropriate for law, provided the law UoA descriptor remains consistent and inclusive of wider social policy, criminology, and also legal education research.
67	No comment
68	none
69	Nil response.
70	<p>BAAS supports the FRAP's proposal that "REF 2028 will retain the REF 2021 Unit of Assessment structure and will include advisory panels on Equality, Diversity and Inclusion, and Interdisciplinary research" (REF 2028: Initial decisions and issues for further consultation, REF 2028/23/01, p.25) in particular with regard to arrangements for UOA 25 Area Studies.</p> <p>American Studies at undergraduate level is under threat in the UK, but continues to thrive in research terms. It is absolutely central to our field that Area Studies be protected as a unit of assessment so that where possible, American Studies scholars can be submitted there as a coherent unit where departments continue to exist, in order to help those departments retain coherence and identity. REF28 could do much more to explicitly encourage and reward interdisciplinarity than it does at present.</p>
71	<ul style="list-style-type: none"> • We have general concerns around large submissions – contributions to the discipline may be difficult to articulate in larger submissions. For example, in UOA D33: Music, Drama, Dance, Performing Arts, Film and Screen Studies there is such a breadth of disciplines included and so does this pose an issue generally for the sector or does it depend on the discipline areas? Greater clarity on how this will be assessed would be welcomed. • The specific definition of UOA A3 seemingly excludes much of the work that is done within our colleagues' areas of expertise on the integration of health and social care services. This is an ongoing concern, as such work does not have an obvious 'home' within REF. • There could be potential unfairness in the assessment – small single subject UOAs require less time than multi-disciplinary UOAs such as D33.
72	<p>Some UoAs incorporate much wider fields and epistemological stances than others and we are not confident that this does not impact the work of the panels. Music, Dance, Drama and Performing Arts, Film and Media Studies incorporates research on all possible musics; drama practices from across the globe; empirical, philosophical, hermeneutic and ethnographic approaches; work at the intersections of public health, sociology, anthropology, psychology, physics, education, visual and fine art and cultural studies - here, we are reflecting only the work in our relatively small unit! This is, manifestly, a much wider UoA than Classics.</p> <p>Such issues should, we would argue, be kept under continuous review in each REF.</p>
73	<ul style="list-style-type: none"> • We broadly welcome the continuity of UOAs from REF2021, especially if the UOA descriptors remain unchanged. However, we do question the pairing of some disciplinary

	<p>areas such as UOA 24 Sports & Exercise Science, Leisure and Tourism. It could be argued that Sports and Exercise Science are more closely aligned to Panel A or B while Leisure and Tourism are more closely aligned with Panel C.</p> <ul style="list-style-type: none"> • The descriptors for the three Health UOAs 1, 2 and 3 – need greater clarity and distinction. • There is a lack of representation for the discipline of criminology with the result that staff can be allocated to a number of different UOAs (including Law, Education, Sociology, Psychology, Social Policy and Social Work). Given the need to assign staff so early in the REF cycle under the proposed new guidelines this could be problematic for staff within this subject area in terms of meeting the relevant panel criteria.
74	<p>Support retention of the Geography and Environmental Studies panel. However, we do note that the real issue is the pre-allocation of funding to the four panels. Last time this led to significant negative financial outcomes, particularly for Panel C. This may encourage ‘gaming’ where institutions make strategic submissions to units of assessment (favouring Panels A and B).</p> <p>For geography this has the implication that submissions may well be split - with physical geography being submitted to Panel B and human geography to Panel C. This could have have negative implications for departments and the health of the discipline more widely.</p>
75	<ul style="list-style-type: none"> • We (like many HEIs) are currently restructuring into larger administrative units and so anticipate we may submit to a smaller number of UoAs in the next exercise which more accurately represents our research environment but with more outputs which cross UoA boundaries. As such, the ability to cross refer outputs to other UoAs remains crucial. • We also note that fewer but larger UoAs across REF would help resolve a lot of structural issues related to interdisciplinary research, small Units, disparities in the burden associated with case studies / equalities etc. which vary by size of Unit.
76	<p>As noted in Q6, retaining the UoA structure is important to stability and to the calculation of FTE volume. Whilst changes could be introduced before the relevant years of HESA data for this exercise, future exercises will use the full census period, and hence variations could be problematic. Any evolution of the UoA structure in the future would need to take this into account, preferably making any alterations to the structure before the end of the first year of the assessment period.</p>
77	No response proposed
78	<p>No changes to propose on the UOA Structure.</p> <p>However, in the absence of a “catch-all” textbox to capture HEI thoughts on the REF2028 Initial Decisions more generally, we highlight our concerns regarding the burden of preparing and submitting to REF2028.</p> <p>The funding bodies claim that (if implemented) the initial decisions on REF2028 will impart less administrative burden on HEIs, for example by not introducing an altered or new process for staff selection and removing the requirement for impact to be based on research of 2* quality. However, universities will (on the basis of the proposals) i) have an increased pool of eligible outputs to review and this is a major challenge; ii) have an expanded impact landscape to monitor, support and filter for REF impact case studies; iii) be required to submit a new narrative on the contribution of the institution to knowledge and understanding without a commensurate reduction in the number of outputs to be submitted; iv) have altered formats and new evidence/content requirements for institutional-level and discipline-level statements.</p> <p>Beyond these limited examples, there are elements of REF2028 that remain uncertain/unknown, including how unit circumstances will be assessed and what evidence</p>

	<p>will be needed to inform this, and whether any new requirements or changes in terms of open access policy are to be introduced for REF2028.</p> <p>The totality of the extra work in preparing submissions, and the remaining uncertainties within the assessment framework are a real cause for concern and we urge the funding bodies to consider taking a staged approach to the implementation of changes across the next two REF exercises and opposed to singularly full adoption in REF2028.</p>
79	<ul style="list-style-type: none"> • The UOA structure is appropriate.
80	<p>UHI strongly contends that the UoA structure should not be changed from REF 2021, and that both the current main panels and the current UoAs should prevail. A main reason for is that the sector is already about three years into the assessment period, and that decisions about which UoAs an institution would like to submit to will need to be made by the end of academic year 2023/24 given the HESA staff return considerations.</p>
81	<p>Consideration might be given to creating a separate Criminology unit. Research in criminology spans, law, sociology, and psychology and is a large unit of research in its own right.</p>
82	<p>Accounting and Finance was a separate unit of assessment until REF2014, where it became part of the larger Business and Management Unit of Assessment. This has resulted in an excessively large Business and Management unit of assessment (UOA 17). For example, in REF2021, UOA 17 was one of the</p> <p>largest with close to 17,000 outputs submitted and assessed. Of these, Accounting and Finance submission was about 4,000 to 5,000 (about 1000 to 2000 in accounting and about 2000 to 3000 in Finance) outputs with corresponding staff FTE submissions. Thus, the Accounting and Finance submission alone was larger than several units of assessments, such as Archaeology, Economics and Law, amongst many others. The unusually large submission to the Business and Management of which Accounting and Finance was part, introduced major challenges and complexities into the assessment process. Since REF2021, Accounting and Finance has continued to grow rapidly, and submissions to REF2028 is highly likely to be larger. Such growth is backed and driven by the relatively high demand for Accounting and Finance degrees relative to both other Business and Management degree programmes within Business Schools, and other non-business and management degree programmes across universities.</p> <p>Against this background, retaining Accounting and Finance as part of the Business and Management Unit of Assessment will make it extremely difficult its research to be assessed in REF2028 given it is likely to be larger again than REF2021.</p> <p>Therefore, we are suggesting the restoration of the Accounting and Finance Unit of Assessment as a standalone Unit of assessment from the larger Business and Management Unit of Assessment in REF2028. This will enhance the assessment of outputs, engagement and impact, and people, culture and environment of both Accounting and Finance discipline, and Business and Management discipline research. We believe there will be strong interest in institutions submitting to or expressing strong interest to submit to such a new Accounting and Finance UOA. At the very least, we suggest that this can be done by first consulting institutions to gauge the level of interest on whether they will be interested in submitting to such a new Accounting and Finance UOA. We will also be able to support such an exercise by consulting our members through our Committee of Departments of Accounting and Finance (CDAF) and Committee of Professors of Accounting and Finance (CPAF) in future.</p>
83	<p>a) we would note that the Main Panels have very different compositions in terms of the UoAs within them. Main Panels C and D contain more mono-disciplines, in contrast with Main Panel A, for example. This has an impact upon the visibility of the smaller disciplines</p>

	<p>in Main Panel A, and upon the viability of the Disciplines in Main Panels C and D.</p> <p>We do not propose changes at this stage in the cycle</p>
84	Current structure is fine.
85	<p>Applied Linguistics is not explicitly represented in the Unit of Assessments. In REF 2021, a large proportion of Applied Linguistics outputs were submitted to sub-panels including Education, Modern Languages and Linguistics, English Language and Literature, and Area Studies, which fall into two main panels (C and D). There are a number of issues with this approach in the context of the REF purpose published on the REF website (https://www.ref.ac.uk/about-the-ref/what-is-the-ref/):</p> <ol style="list-style-type: none"> 1. Applied Linguistics is not featured in any of the above sub-panel names nor its descriptors. This lack of visibility or recognition is out of line with the significant growth of Applied Linguistics research community – BAAL membership currently stands at over 1,300 - and not conducive to the purpose of benchmarking and recognition envisaged by REF. The recently updated Linguistics Subject Benchmark Statement (released in September 2023 at https://www.qaa.ac.uk/the-quality-code/subject-benchmark-statements/subject-benchmark-statement-linguistics) recognises the inter and transdisciplinary nature of Applied Linguistics, its expansive scope and its unique contributions to understanding language-related issues in society and individuals' lives: “Applied linguistics uses insights from linguistics, sociology, education and psychology, and other disciplines to study real-world questions and problems involving language and, in partnership with those involved, to seek practical solutions for them. Areas involved include language learning and teaching, the role of language in education, and communication in professional and public service contexts. Applied linguistics, including critical applied linguistics, problematises traditional approaches to language research, pushes for methodological and conceptual innovations, and covers a wide range of topics such as World Englishes, social justice, language and symbolic power, multimodal analysis, language coloniality and decolonisation, as well as how language intersects with topics such as gender, sexuality, social class, race and the environment, among many others.” (Linguistics Subject Benchmark Statement, 2023, p.13). In REF 2021, the lack of visibility and disciplinary home for Applied Linguistics resulted in a situation, for example, where all Applied Linguists of a specific department were submitted to one sub-panel, say, education but a significant proportion of their work did not have a clear/substantial? education focus. 2. Related to 1, Applied Linguists are often added at a late stage in the constitution of the sub-panels, only as output assessors. They have no role in deciding the criteria and working methods of the sub-panel. 3. The lack of visibility results in difficulty in making constructive use of the REF outcomes both within the learned society and at institutional level, thus undermining the significance of REF outcomes. 4. With the option of no less than 4 sub-panels to submit to, there is the inevitable question as to whether and to what extent Applied Linguistics can be assessed consistently and fairly across sub-panels. While it is appreciated that there was some bottom-up effort to coordinate this within the REF 2021 panel structure (e.g., a working group to enable the Linguistics and Applied Linguistics panel members to share their experience during the assessment period) and assurance from the sub-panel chairs involved, there was some uncertainty, confusion or factual discrepancies between each sub-panel. One example of this is the types of outputs allowed or desired by different sub-panels. Panel D in REF 2021 lists a broader range of output types which includes digital and visual media, exhibition, edited book, composition, while these are not (or perceived to be) typical outputs with Panel C. This kind of discrepancy invites speculation as to whether one type of output

	<p>would fare better in one sub-panel than another. It is not clear either whether interdisciplinary outputs were treated or, indeed, the notion of interdisciplinarity is conceptualised, consistently across the sub-panels.</p> <p>Suggested Changes:</p> <ol style="list-style-type: none"> 1) To formally recognise and represent Applied Linguistics in the panel formation, ensuring that Applied Linguistics are represented as full members on sub-panels; 2) To recognise and represent Applied Linguistics in the descriptors of relevant sub-panels which currently include Education, Modern Languages and Linguistics, English Language and Literature, and Area Studies; 3) To strengthen and formalise cross-sub-panel collaboration in assessment between? those sub-panels from the start; 4) To work closely with learned societies to ensure sufficient representation of Applied Linguistics across panels, and to appoint panel chairs and members that have a broad view of linguistics and appreciate the wider applied nature of the work Applied Linguists do; 5) To appoint Applied Linguists as full panel members during the stage of setting criteria and working methods, not added later as output assessors; 6) To recognise that in some institutions where Applied Linguists find themselves to be submitted along with other members to a sub-panel where their work may not be directly focused on the core questions of the discipline, procedures need to be in place to make it easier for outputs to be cross-referred to other sub-panels. For example, institutions could be allowed to indicate 'secondary' sub-panels for outputs. This information could assist allocation of cross-referrals and workload planning. The 'interdisciplinary' tag used in REF 2021 was not intended to serve this purpose.
86	<p>We maintain that some small units retaining their own UoAs is against cost efficiency measures (introduced as part of the shift from RAE to REF). UoA 33 (Music, Drama, Dance, Performing Arts, Film and Screen) is a testament to the value of interdisciplinary cooperation. The retention of small units, which are significantly smaller than other UoAs in Panel D, reinforces a perception in other disciplines that there are subject-level biases at REF level. Larger panels also have larger workloads and increased factors to consider. A smaller UoA is an advantage to that subject area under those terms alone. The differences between classics and history/philosophy, for instance, are not dissimilar to the differences between music and film.</p>
87	<p>Our member Learned Societies have different views about the UoA structure and will make those points directly in their own submission. As the umbrella body for social science disciplines, however, we would make an over-arching point that we welcome the further development of the process by which interdisciplinary work might be recognised and rewarded (while appreciating the progress made in the last round of assessment). This is likely to be especially valuable for units of assessment and colleagues seeking to address 'grand challenges' in partnership with other disciplines where the norms of publishing are considerably different. It would be helpful for a greater sense of what kinds of understanding of interdisciplinarity are emerging in different sub-panels and for processes to evaluate outputs to be scoped fairly.</p>
88	<p>[No comment]</p>
89	<p>As an International Studies disciplinary body we welcome keeping sub-panel 19, which makes sense for our discipline, particularly given the composition of departments/schools across the United Kingdom.</p>
90	<p>The Council of Deans of Health supports the current UOA structure however midwifery should be named in title of UoA3 as it is a discipline in its own right – for example, "Unit of assessment 3: Allied Health Professions, Dentistry, Midwifery, Nursing and Pharmacy".</p> <p>UOA3 is broad in terms of the disciplines it includes and the diversity of disciplines should</p>

	also be represented in the panel, particularly as its includes disciplines at very different stages of research maturity. Consequently, we would encourage the panels to provide feedback on the strengths and weaknesses of all disciplines included in that UOA.
91	<p>Nursing falls within UOA3, which is a very broad grouping in terms of the mix of disciplines. There is a danger of nursing, which is a large discipline in its own right, becoming ‘hidden’ among these other disciplines. A review of impact case studies in the Ref2021 that related to nursing shows that research led by nurses has been submitted to other UoAs than 3 and that this may reflect a growing trend toward more interdisciplinary research. The panel should reflect this shifting profile and include a range of people who are research active as well as being in senior management roles. The discipline level statement must permit the strengths of each of the included groups to be highlighted clearly and this should also be reflected in the institutional level statement.</p> <p>It is important that the diversity in this UoA is captured and also mirrored within the assessing teams. This includes a wider range of ages, ethnicities, and other protected characteristics.</p>
92	<p>████████████████████ I support the FRAP’s proposal that “REF 2028 will retain the REF 2021 Unit of Assessment structure and will include advisory panels on Equality, Diversity and Inclusion, and Interdisciplinary research” (REF 2028: Initial decisions and issues for further consultation, REF 2028/23/01, p.25) in particular with regard to arrangements for UOA 25 Area Studies.</p> <p>I would strongly encourage the maintenance of Area Studies as a continuing and separate UoA. In my institution (UCL), this allows for the flourishing of distinct, multi-disciplinary approaches to Area Studies within multiple departments rooted in its specific traditions, methodologies, and also its diverse approaches to policy engagement. These distinct contributions to the research and policy landscape in UK HE would be lost if UOA 25 did not exist.</p> <p>Furthermore, Area Studies at undergraduate level is under threat in the UK, but continues to thrive in research terms. It is thus vital that Area Studies be protected as a unit of assessment so that where possible, Area Studies scholars can be submitted as a coherent unit where departments continue to exist, and in order to help those departments retain coherence and identity. Connectedly, REF2028 could do much more to explicitly encourage and reward interdisciplinarity than it does at present.</p>
93	<ul style="list-style-type: none"> • There is no consensus in our group on this issue. Some feel that the merger of sub-panels from REF2021 would constitute a serious risk to the disciplinary identity and sustainability of those subject areas at a time when the humanities are generally under threat. An alternative view is that the growing discrepancy in panel size – which risks becoming even greater for the next exercise than in REF2021 – may create challenges for calibration within sub-panels and will generate significant inequalities in workload across sub-panels (which may have its own EDI issues for panel members). Whatever the final decision of the funding bodies on this issue, it is important that there is reasonable equality in workload across sub-panels.
94	N/A
95	<p>We support the proposal to retain the REF 2021 Unit of Assessment structure. This provides some necessary consistency in support of embedding the considerable changes to the way that the exercise is conducted.</p> <p>In particular, we note this with regard to UOA25 Area Studies. While other UOAs may receive some work in Area Studies, recent and ongoing developments within Area Studies as</p>

	<p>a discipline, and internationally, mean that it remains vital it is retained as a discrete unit of assessment. These developments include geopolitical and security challenges, economic and trade opportunities, migration and cultural exchange inter alia. The discipline's contribution to understanding these developments is strengthened by its broad and inclusive emphasis on both global language-based Area Studies and Anglophone scholarship.</p> <p>We are not convinced that there is a case for UOA 29 Classics to remain a small and specialist panel given that other disciplines have been conglomerated together into single UOAs (e.g. UOAs 33 and 34). Given that there were fewer than 20 submissions in the last REF, now may be the time to include the sub-disciplines in other cognate Arts and Humanities UOAs.</p>
96	<p>As an organisation we encourage the recognition and note the importance of interdisciplinary work. While the UoA structure is set to be retained, there are some concerns about the value given to interdisciplinary research in the initial decisions surrounding REF 2028. As an organisation committed to law, technology, and education, while much of the work of our members will fall within one dominant discipline and UoA e.g., UoA 18 or UoA 23, there is less clarity around work which has technology at its disciplinary core, and which does not per se have a natural UoA. This concern remains for work which is interdisciplinary and which may naturally spread across UoAs and Panels. It would therefore be of use and value to see a UoA with technology at its core included in the structure for REF 2028.</p> <p>While both Law and Education fall within Main Panel C – which alleviates some concerns surrounding interdisciplinary work on legal education, there is little scope at present for technology to fall within the same Main Panel. We note that work may be submitted to different panels by different UoAs where it is interdisciplinary, but this nevertheless makes it somewhat more difficult for a consistent view to be taken of work spanning law, education and technology, where one of the triumvirate (technology) is missing within a Main Panel.</p>
97	<p>We firmly believe the UoA structure used for REF 2021 should be maintained for REF 2028. It is worth noting, however, that with the proposed changes to the volume measure (relying on HESA data), it is unclear to us how multiple submissions within a unit of assessment would work.</p>
98	<p>We do not propose any changes to the UoA structure, although more interdisciplinary guidance that engenders confidence in submitting interdisciplinary work would be welcome. If an interdisciplinary flag is to be included, such as in REF2021, then transparency of what each sub-panel will do with that information would be welcome.</p> <p>Similarly, clear guidance is required for the narrative elements of multi-disciplinary submissions e.g. UoA 33. While some panels cover a very diverse set of activities, the guidance appears to be couched in the language of a single discipline. This is particularly important where the narrative elements have significant weighting overall.</p>
99	<p>Our institution was satisfied with the UoA structure for REF 2021.</p>
100	<p>• Current UoA structure is appropriate.</p>
101	<p>Continuity with the UoA structure is important in enabling HEIs to plan and prepare for subsequent assessment exercises and, providing that UoA descriptors evolve to reflect the current and emerging landscapes for each discipline, we feel that the current UoA structure is appropriate and fit for purpose.</p>
102	<p>UOA structure is fine, the issue is the descriptors overlap and it is not clear what the impact on an output will be i.e. where do we submit them if they are not following staff and therefore can you submit the same outputs to a range of UOAs.</p>

103	We are happy with the proposed UoA structure and do not suggest any changes.
104	<ul style="list-style-type: none"> • AUB is broadly content with the UOA structure and believe the continuity with REF is a good thing. • However, there is variance in the UOA structure in Main Panel D resulting in the perception that some disciplines are more equal than others or more inherently deserving of rigorous assessment. The retention of Classics with its own discrete UOA seems at variance with other wider UOAs that have subsumed other disciplines. • The size of the membership of sub-panels should be proportionate to ensure parity of workload.
105	UOA structure is obviously not perfect but it is difficult to see a simple or viable alternative which could be implemented.
106	N/A
107	Nothing to State
108	We maintain that some small units retaining their own UoAs is against cost efficiency measures (introduced as part of shift from RAE to REF). UoA 33 (Music, Drama, Dance, Performing Arts, Film and Screen) is a testament to the value of interdisciplinary cooperation. The retention of small units such as Classics, Area Studies, Theology and Philosophy, which are significantly smaller than other UoAs in Panel D, reinforces a perception in other disciplines that there are subject level biases at REF level. Larger panels also have larger workloads and increased factors to consider. A smaller UoA is an advantage to that subject area under those terms alone. The differences between classics and history/philosophy, for instance, are not dissimilar to the differences between music and film.
109	<p>We are broadly content with the UoA structure and believe the continuity with REF 2021 is a positive thing. However, we would note the following has been fed back from staff:</p> <ul style="list-style-type: none"> • The continued combination of psychology, psychiatry and neuroscience under UoA4 will further marginalise psychology disciplines which are not medical, biological or experimental in focus. • The continued incorporation of some substantive disciplines, such as criminology, media studies and screen studies, into wider UoAs, whilst other disciplines such as Classics retain their own discrete UoA, may have impacts on the identities of these disciplines.
110	Retaining the REF 2021 UOA structure will aid our planning and add consistency.
111	Given how far into the current REF cycle we are any changes to the UOA structure at that time would be very challenging.
112	We do not propose changes to the UoA structure.
113	<p>No general concerns on the overall structure but (as referenced above in Q7), but we have gender equality concerns for the A04 unit (psychology, psychiatry and neuroscience) in which already exists a strong disciplinary bias against qualitative psychology research. Decoupling outputs and removing the minimum and maximum thresholds for outputs will exacerbate this bias.</p> <p>Psychology is a long-established discipline – one of the, if not the, largest in many universities. Neuroscience emerged from psychology and while is still a sub-discipline within many psychology departments also now exists as a distinct discipline within its own right. Psychiatry by contrast is a medical speciality. The present alignment of psychology with neuroscience and psychiatry serves to distort the discipline of psychology within REF and UK academia. Whilst moving Psychology out of A04 is not envisaged, we see no sufficient counterbalances in the proposals to mitigate the risk of distinct research communities in a broad UOA being marginalised.</p>

114	<p>Eastern Arc broadly supports the retention of the UoA structure used for REF2021. It provides a level of certainty and continuity that is welcome. However, the existing structure is not without its faults, which include:</p> <ul style="list-style-type: none"> - Portmanteau UoAs. Whilst some UoAs have a clear disciplinary focus, others appear to be a collection of smaller disciplines that don't fit easily elsewhere but don't sit naturally together. Examples include UoA24 (Sport and Exercise Sciences, Leisure and Tourism) and UoA34 (Communication, Cultural and Media Studies, Library and Information Management). These are at best awkward marriages of convenience, and make it difficult for panellists to properly assess submissions. - Reinforcing silos. Whilst much effort is being expended by funders in encouraging interdisciplinary and cross-disciplinary research, the structure of the REF reinforces a rigid mindset that focuses squarely on traditional disciplines. Whilst some recognition of the need to support interdisciplinary research (IDR) is demonstrated in the proposals (paragraphs 60-64), the consortium would like to see a more fundamental approach to changing mindsets and attitudes to IDR rather than fixing more operational issues. - Critical mass in vulnerable disciplines. With current trends in HE, smaller disciplines (particularly in the arts and humanities) are contracting in many non-Russell Group HEIs. As a result, UoAs such as Modern Languages and Linguistics (26) or Classics (29) are particularly vulnerable, and RE needs to give further thought as to how best to support and assess them as part of the wider exercise.
115	<p>UEA supports the FRAP's proposal that "REF 2028 will retain the REF 2021 Unit of Assessment structure and will include advisory panels on Equality, Diversity and Inclusion, and Interdisciplinary research" (REF 2028: Initial decisions and issues for further consultation, p.25) in particular, we note this with regard to UOA25 Area Studies. While other UoAs may receive some work in area studies, recent and ongoing developments within Area Studies as a discipline, and internationally, means that it remains vital it is retained as a discrete unit of assessment.</p> <p>UEA also encourages the reintroduction of multiple submissions being eligible, particularly for broad ranging UOAs covering multiple disciplines.</p>
116	<p>The RSE's recommendations outlined here do not necessarily imply significant changes must be made to the proposed structure of units of assessment. However, a general recommendation would be to consider how interdisciplinary research fits within the existing framework, and how interdisciplinarity can be further recognised and rewarded through the PCE for instance. While great strides have been achieved in supporting interdisciplinary research in the past, particularly through the creation of a dedicated interdisciplinary panel, there is a general understanding that this is not sufficient, and it is out of pace with the way many funding programmes are designed. Funding bodies such as UKRI, Horizon, as well as our own RSE Research Awards Programme tend to favour interdisciplinary research that addresses grand challenges (such as the SGDs for example) rather than discrete discipline-specific projects. However, institutions continue to view interdisciplinary research as risky, and the emphasis on siloed units of assessments could reinforce this reticence. This shift needs to be awarded greater recognition in the REF process and in the guidance provided for panel assessment in the current structure. Pioneering new approaches to interdisciplinarity, the REF process could thus provide a leading model for supporting and acknowledging interdisciplinary work that would cascade at institutional level.</p>
117	<p>We support retaining the existing UOA structure. The guidance should also retain the option to make multiple submission in Panels C and D, not least in Area Studies.</p> <p>However, as in previous REF exercises, we have several interdisciplinary departments at UCL</p>

	that do not sit fully within any of the UOA descriptors. In previous exercises these departments have been submitted across multiple UOA but some research leads feel that the value of their interdisciplinary work is not fully represented in any one unit.
118	Currently Panel D areas are very broad – for example Music, Drama, Dance, Performing Arts, Film and Screen Studies includes a large range of disciplines with a range of different output types and therefore a range of panel reviewers across all of these areas is required, which might influence panel discussions. In comparison, some panels such as Psychology, Psychiatry and Neuroscience were dominated by clinical psychologists and neuroscientists rather than social psychologists, which disadvantaged UoA submissions with a wider interdisciplinary focus.
119	<p>The University welcomes the approach to retaining the UoA structure from REF2021. Previous changes have led to additional burden and various ‘forced marriages’ between departments. These are now well embedded for REF purposes and any additional changes will likely create new issues that are preferably avoided.</p> <p>More explicit clarification of the approach to multiple submissions to UoA within REF2028 would be welcome. The vague guidance available for REF2021 allowed for different approaches which might have advantaged some institutions over others.</p>
120	We do not propose any changes to the UOA structure.
121	Good job on encouraging disciplinary siloing when it's blatant that all the most urgent global issues patently require transdisciplinary collaboration! The REF is such a damaging and wasteful endeavour.
122	<p>To ensure coherence in the field of communication, media, film and cultural studies we support the suggestion amongst many in the sector that the “film, television, screen studies and broadcast media” element of UOA 33 is moved from that unit to be included within UOA 34.</p> <p>Given the strength of midwifery research represented within UOA 3 in REF2021, we would advocate for ‘Midwifery’ to be included within the title of the unit in future REF exercises.</p>
123	No comment
124	We do not see a pressing need to change the existing panel and UOA structure, given the importance for HEIs to have consistency and continuity in the way REF is being conducted.
125	<p>This is the British Society of Criminology’s response to the current consultation on the Research Excellence Framework 2028.</p> <p>The British Society of Criminology (BSC) is a 60-year-old subject organisation with more than 1000 members working at over 90 different universities across the UK. These universities are the home of some of the most important international journals in criminology including but not limited to Criminology and Criminal Justice (the BSC’s official journal), The British Journal of Criminology, The Howard Journal of Criminal Justice, The European Journal of Criminology, The Probation Journal, Psychology, Crime and Law, Punishment and Society, Legal and Criminological Psychology, and Theoretical Criminology. Undergraduate and postgraduate courses in Criminology can be found at most of the leading universities in the UK and Criminology has its own subject benchmark statement updated with the QAA in 2022. Approximately 450 academics, practitioners and advanced students attend the BSC’s annual conference each summer, and this is only one of dozens of international meetings of criminological scholars hosted in the UK every year. Criminology as a discipline has grown and continues to grow (the REF’s own report talks about ‘the widespread growth in criminology as an academic discipline’.) and is recognised by other countries in their own research excellence assessment exercises – such as Australia in its Fields of Research. As far as can be gleaned from the REF as it stands, criminology’s research output is high quality and substantial. Currently criminological submissions are mainly submitted to the three</p>

subpanels – C18 Law, C20 Social Work and Social Policy (SWSP) and C21 Sociology but with a few to other sub panels such as Business and Management Studies, Psychology, Psychiatry and Neuroscience and History.

The BSC welcomes FRAP's commitment to 'identify, through consultation and careful evaluation, those approaches to research assessment that: encourage and strengthen the emphasis on delivering excellent research and impact; support a positive, productive research culture; while simplifying and reducing the administrative burden on the HE sector' and are grateful for the opportunity to comment on proposals. We recognise that there is much positive in some of the proposed clarification such as portability criteria. We are aware however that other learned societies and HEIs are commenting on these elements which impact on our shared social science and academic concerns more widely and so we, as criminologists, will be delimiting our response to one key issue to avoid diluting the message.

Invisibility of Criminology in the REF structure

The issue is what our members refer to as the 'invisibility' of the discipline of Criminology within the REF process in that its name does not appear in any of the titles of the Units of Assessment (UoA). The REF team acknowledge that 'designing the UK's national research assessment exercise offers an opportunity to reshape the incentives within the research system and rethink what should be recognised and rewarded' and we ask that the discipline of Criminology can be recognised, as many much smaller subject areas with fewer practitioners, fewer bespoke journals, far fewer students and degree programmes, and far less policy and international reach, have already been.

We recognise the progress that has been made (following representations from our community) in the last decades to recognise Criminology within the REF process - in terms of appointing increased numbers of criminologists to the UoAs that criminology is submitted to, measures to improve cross calibration and assessment consistency across the sub panels to which criminology is mainly submitted, and an effort to 'flag' criminology submissions across the sub panels in order to be able to create a report about Criminology research such that other disciplines have by virtue of having their own UoA. Lastly, specifically in the SWSP sub panel, the status of criminology within the sub panel was notably improved with a healthy number of criminology panel members and repeated reference to 'Social Work, Social Policy and Criminology' within the sub panel's report. But in some ways these improvements make the REF's intransigence to naming Criminology on that UoA more difficult to defend. We are aware that within the current consultation the titles of UoA is the subject of one of the questions but that in the interests of continuity REF is limiting any comment to changes that occurred since 2021 but we will argue that in practice what we are asking for is not a change but merely a more accurate labelling of what has now already occurred.

Members of the BSC officially complained about the invisibility of the discipline of Criminology in the Society's response to the RAE of 2008 '...the field of criminology remains mostly "invisible" in the research assessment process' even though the BSC estimated that, in the 2008 RAE, there were over 1000 criminology submissions (articles and books) to the Social Policy Panel, at least 477 criminology submissions to the Law Panel, and at least 322 criminology submissions to the Sociology Panel. At this point, by far the most common concern among BSC members about research assessment was the exclusion of criminologists from the law panel assessment. 'The RAE 2008 law panel did not include any

criminologist members, did not draw upon a specialist advisor from the field of criminology, and did not make use of a cross-referral process with other panels (e.g., sociology or social policy) that did have criminological expertise. The most obvious problem here is the lack of substantive expertise needed to critique work on topics such as: 'What Works in Offender Management', 'Predicting Drop Out of Court-Mandated Treatment...' or 'Delivering Cognitive Skills Programmes in Prison: A Qualitative Study' (all examples from law panel submissions to RAE 2008). BSC members were insistent that the exclusion of criminologists from the Law Panel assessment was bad for the field and some suggested that this was part of a wider pattern of territorial "imperialism" on the part of other sub-disciplines.

Following this, in June 2010, in the long run up to REF 2014, a meeting was arranged between [REDACTED], with representatives from the British Society of Criminology and other learned societies to consider whether sociology should be combined with social work, social policy and administration in the REF panel framework. The BSC left this meeting with the impression from around the table that such a merger was likely to take place and that no one present objected to 'Criminology' being included in the title of any new super panel – at the expense of social administration.

But, as the BSC noted in a letter to [REDACTED] following the meeting, "We subsequently heard through the grapevine – as opposed to any official announcement – that the merger would not take place. When we asked the sociologists who had attended the meeting what had happened, we were told that representatives from the Social Policy Association had lobbied HEFCE following the meeting not to go ahead with the merger – a position admittedly they took before the meeting but not one which had seemed to survive the discussions. While we ourselves had reservations about the proposed merger – not least in view of the practicalities of its size and organisation – we do feel somewhat aggrieved about the way in which this decision appears to have been taken. . We felt we had achieved some level of progress for our discipline at the meeting – in that the feeling was Criminology should be named and visible within the Panel structure. But subsequently we did not receive an official communication about the end product of our discussions and have no formal information about why a decision was eventually taken which did not seem to tally with the tenor of the meeting'. Notably at this meeting it was suggested that none of us talk to a Times Higher Education journalist who had been trying to compile a story about this. Maybe, in retrospect, if we had spoken about the agreement to the THE, it would have been honored.

The 2014 exercise went ahead with a much-improved representation of criminologically-trained sub panel members for SWSP, Sociology and Law and an assessor role designed to improve consistency of approach to criminological submissions submitted across multiple sub panels. But Criminology was not named in any of the UoA sub-Panel titles.

In the consultation that followed the 2014 exercise in which the BSC again pressed the case for Criminology to be included in the UoA titles, HEFCE published an initial decisions document to REF 21 which indicated that further discussions would be held with regard to the 'visibility' of Criminology in REF2021. That meeting took place in October 2017 with representatives from the BSC, SLA, The Committee of Heads of University Law Schools, the BSA, and [REDACTED]. An SPA representative could not make the meeting but had sent comments which were broadly supportive of the BSC position.

The meeting was preceded by the circulation of a HEFCE 'discussion paper' which reviewed the situation and outlined three potential options.

a) Retain the 2014 approach, with the opportunity to strengthen the cross-panel calibration procedures. Although it was recognised that - 'These procedures may address some of the issues raised about the visibility and recognition of Criminology; however, it is unlikely to fully address these concerns.' The legal representatives questioned if extra calibration was necessary as they were unaware this was problematic.

b) Include Criminology in the name of a UOA. The options would be to include this in the name of the REF 2021 UOAs: 18: Law; 20: Social Work and Social Policy; or 21: Sociology. A clear rationale would be needed to determine which UOA was most appropriate.

c) Introduce a new procedure to enhance visibility, within a broad 2014 approach. This option – it was suggested - had the potential to address the visibility concern, while continuing to allow the submission of Criminology research across the three UOAs, as most appropriate. It would involve institutions 'tagging' Criminology research outputs at the point of submission. This would enable their identification and appropriate assessment across the three UOAs and would allow a quality sub-profile for outputs to be produced for the field overall (with individual submission sub-profiles informing confidential feedback to HEIs). This would be a new process for HEIs, would introduce an additional burden into the submission process, and would require clear guidance and definitions to ensure its effective operation.

The complexity, additional burdens and uncertainty that HEIs would comply effectively led the BSC to reject option C. It seemed a lot of effort just to avoid doing B.

As then [REDACTED] commented at the time – 'We began by articulating our views about the lack of visibility of Criminology and regarding the inadequacy of previous arrangements for calibrating criminology outputs assessment across the three panels. We made the point that, with HEFCE already acknowledging that some 2/3 of criminology submissions went to panel C20, we were not proposing substantial change, but simply that the status quo be appropriately and accurately described, with 'criminology' in the panel title.

'We felt we were making some reasonable headway, but then the 'summing up' led by [REDACTED] seemed to drift us back towards option A. HEFCE expressed a willingness to consider further input and comments, so we have raised the point that the meeting was equally split about the options for moving forwards, except for the fact that there were two Law bodies in attendance but only one for the other disciplines.'

As far as we know, no further review was undertaken, and a hotchpotch of options A and C were undertaken in REF 2021 with the option C flagging system proving to be as ineffective as we had predicted in that meeting (with even articles in criminology journals not always flagged as criminology). However, despite the pandemic, procedures were agreed and implemented to ensure a broad consistency of approach to Criminology across the sub panels and for this we are grateful to the criminologists sitting on these panels who made this happen. A promised Report on Criminology across the 3 sub panels never materialised though in the Overview report by Main Panel C and Sub-panels 13 to 24, a sub section on Criminology was included alongside Social Policy and Social Work, thanks in large part to the efforts of two past Presidents of the BSC who had worked as members of that panel and

undertook some review work to bolster the failed flagging experiment. Subpanel 21 (Sociology) took the position of not naming particular sub-areas 'as there were strengths across the submission, including much work that could be seen as criminology, but also could be seen simply as good sociology'. Law (sub Panel19) merely commented that 'a very substantial number of outputs (situated both domestically and internationally) were submitted in the areas of criminal law, criminal justice, and criminology'. A meeting of criminologists across the 3 sub panels took place to discuss the extent and nature of criminology flagging, impact case studies, new topics and emerging themes but no report of this was published.

Unit of Assessment Social Work and Social Policy and Criminology

Throughout the UoA 20 Social Work and Social Policy section of the Panel C report, except when the official title of the UoA is quoted, the remit of the panel is referred to as 'Social Work, Social Policy and Criminology'. – 'As set out in its panel descriptor, UOA 20 covered a broad range of subject fields, with the emphasis on social work, social policy and criminology, but not restricted to these core areas' and 'the sub-panel was pleased to see that 14 new units had submitted to SP20 for the first time, welcoming this as a sign of the ongoing expansion of social work, social policy and criminological research throughout the HE sector'. Judged on the rough indicator of numbers of second reader (expert) allocations, the sub-panel received outputs totalling approximately 1,400 for social work, 2,220 for social policy and 1,130 for criminology though it was noted that 'not all units with significant elements of social work, social policy or criminological research capacity submitted to SP20, meaning that by no means all the research effort in these disciplinary areas was assessed by the sub-panel'. The volume of criminology work to the sub panel was reflected in the appointment of a criminologist as a deputy chair of the sub panel and this in turn probably impacted the level of interest and information emanating from the sub panel about criminology.

Impact of exclusion

The REF uses disciplines as its unit of measure to assess the quality of research at universities across the UK. It defines those disciplines by the Units of Assessment.

As in REF 2021, institutions will be required to submit outputs, impact case studies and a statement relating to each of the disciplinary areas (defined by the UOAs) in which they have research activity, alongside an institutional statement.

People, Culture and Environment (25% weighting). This element replaces the environment element of REF 2014 and 2021 and will be expanded to include an assessment of research culture. Evidence to inform assessment of this element will be collected at both institutional level and at the level of disciplinary submissions.

Contribution to Knowledge and Understanding (50% weighting). This element expands the outputs element of REF 2014 and 2021. The assessment will continue to be largely based on assessment of submitted outputs. In REF 2028, however, at least 10% of the score will be based on the relevant sub-section of the disciplinary-level statement, which will provide evidence of the broader contributions to the advancement of the discipline.

Engagement and Impact (25% weighting). This element replaces the impact elements of REF 2014 and 2021, although it is similar to the impact element of 2014. Submissions will consist of both impact case studies and an accompanying statement, taken from the disciplinary-level statement to evidence engagement and impact activity beyond case studies.

	<p>To exclude Criminology from the table of UoA has an impact on individual criminologists and the status of Criminology within university departments. The British Society of Criminology is also finding that the decision of the REF team to exclude Criminology from its Units of Assessment is directly impacting the discipline's position in other organisations – such as the main social science funding body the ESRC and umbrella bodies such as the Academy of Social Science who, when successfully challenged as to why it had removed Criminology from its disciplinary list, stated that it wanted to be 'consistent with the REF'.</p> <p>A large part of the objection to Criminology being added to the title of one of the sub Panels is that the other two sub panels to which Criminology outputs are most often submitted would 'lose out' as the addition of Criminology to one UoA's title would, they claim, mean all Criminology submissions would henceforth go to the one named. This is a specious argument – disciplinary boundaries are porous across the REF piste and submissions from disciplines which are named on sub panels and even have their own UoA are routinely submitted together with other outputs from myriad disciplines to the UoA which overall suits the organisation of the submitting institution best. So Criminology could go to Law if criminologists work in a legal department, Criminology could go to Sociology if the criminologists sit more easily with their sociology colleagues' submission, just as some Chemistry outputs can go to Allied Health Professions, Dentistry, Nursing and Pharmacy UoA and some Biological Sciences to the Chemistry UoA. REF has confirmed that this will continue to be the case:</p> <p>Do HEIs still have discretion to allocate staff (and their outputs) to UOAs as they judge appropriate, and can these be changed to reflect changes in structure? • Yes, HEIs will have discretion on which UOA is most appropriate for a given staff member.</p> <p>It is our contention that the bigger picture of the future of the discipline of Criminology requires its inclusion in one of the UoA titles – just as Film Studies was last round. What research quality related criteria were used to include Film and Screen Studies and exclude Criminology being named? While we appreciate the desire for continuity to aid comparison across the years, the inclusion of the name of Criminology within the SWSP UoA would not in our view create substantial change as it is already acknowledged that the majority of criminology is already submitted there. But the continued exclusion of Criminology in the UoA titles means that the research exercise eliminates one of the country's fastest growing social sciences which in our view is looking increasingly strange. The number and variety of workarounds – roving assessor, calibration meetings, mentions in reports – that Criminology has attracted from the REF team over the years – suggests that the current situation of exclusion is not working and that this does need to change in 2028.</p>
126	We are happy to retain the current structure.
127	We do not propose any changes to the UOA structure for REF 2028. However, we are keen that institutions are able to make multiple submissions to the same UOA and that guidance is published soon.
128	Our subject associations support FRAP's proposal that "REF 2028 will retain the REF 2021 Unit of Assessment structure and include advisory panels on Equality, Diversity and Inclusion, and Interdisciplinary research" (REF 2028: Initial decisions and issues for further consultation, REF 2028/23/01, p.25) in particular with regard to arrangements for UOA25 Area Studies. UKCASA is supportive of the proposal from Research England to maintain the panel structures from REF 2021 which worked well. We see no need for changes. In particular, our membership of many (18) separate subject associations in Area Studies wish to see the arrangements for that panel maintained as in REF2021 as a free-standing, independent panel.

129	We are seeing much larger societal challenges being addressed by funding bodies and some of the major journal channels. So, attention to this growing multidisciplinary research is worthwhile. For example, we will see, and have already seen, changes to various institutes to create cross-academy entities that comprise staff from many different HESA/REF UoAs - how do we best organise the UoA structure to assess the significance of such cross-UoA outputs, environment and impact of these on a level playing field, i.e. where different approaches have been taken by different institutes?
130	No proposed changes.
131	Ensure that panels represent heterodox viewpoints - not true in many - education being an example. Evidence is not needed this is a philosophical point.
132	Retaining the UoAs in their current configuration is prudent given where we are already in the REF cycle but we would potentially advocate in the longer term for a mechanism to reduce the subject siloes that the current 34 UoAs have created and/or creating a new inter-disciplinary UoA.
133	We do not propose changing the UoA structure.
134	The British Association for Canadian Studies strongly supports the proposal that REF 2028 should retain the REF 2021 Unit of Assessment structure, especially the separate unit for UOA 25 Area Studies. We also support advisory panels on Equality, Diversity and Inclusion, and Interdisciplinary Research, especially with regard to arrangements for UOA 25 Area Studies.
135	BAFTSS notes that HESA data does not readily or adequately capture the diverse, interdisciplinary and often collaborative research undertaken across its subjects areas represented by the Association. Thus, we are concerned that connecting the REF 2028 to HESA data might not recognised or make visible the diversity and quantity of research in film, television and screen studies that reaches the highest standards of excellence. For example, HEFCE's Response to a joint statement by the British Association of Film, Television and Screen Studies and the Media, Communication and Cultural Studies Association regarding the REF 2021 open consultations noted the 'differences in the rich and diverse histories and traditions of each association' and that there would be research outputs submitted across numerous UoAs. HEFCE's Response can be read here https://www.meccsa.org.uk/news/joint-statement-from-baftss-and-meccsa-on-ref2021/ . For example, BAFTSS includes scholars with research interests in film studies, film history, television studies, aesthetic and textual analyses of film, immersive media, digital media, archival research, film philosophy, modern languages, cultural studies, cultural theory, creative and cultural industries, practice research, gender and sexuality, popular culture and area studies. This evidences the interdisciplinary strength of our subject areas and connections that are integral to innovation, impact and engagement. The REF Panel D Overview Report (https://www.ref.ac.uk/media/1855/mp-d-overview-report-final.pdf) notes a significant number of outputs submitted to UoA33 and UoA34 were in film, television and screen studies. It is problematic to link REF2028 to HESA data because there are submissions in film, television and screen studies across numerous UoAs. These include: UoA 25 Area Studies. UoA 26 Modern Languages and Linguistics. UoA 27 English Language and Literature. UoA 33 Music, Drama, Dance, Performing Arts, Film and Screen Studies. UoA 34 Communication, Cultural and Media Studies, Library and Information Management.

	<p>It is vital that the REF2028 finds a way to recognise film, television, screen studies across UoAs so that HEI decisions, future funding and post-REF analytical narratives make the breadth and value of work in our Association subject areas visible. In this respect, the British Association of Film, Television and Screen Studies asks that 'Television Studies' is named in UoA 33. We ask that HEFCE's recognition that there are significant research outputs in film, television and screen studies submitted across numerous UoAs is noted by the REF 2028 planning as this diversity and interdisciplinarity is integral to innovative research in our subject areas.</p>
136	<p>The disciplines within Business & Management (sub-panel 17) have continued to grow since REF2021, and this has implications for the logistics of managing such a large panel.</p>
137	<p>Surrey supports the funding bodies' proposal to retain the UOA structure from REF21.</p>
138	<ul style="list-style-type: none"> • We are satisfied with the existing structure.
139	<ul style="list-style-type: none"> • Supportive on maintain the current UoA structure, as institutions are familiar with the UoA descriptors from the last REF and enables continued forward planning for the next REF in terms of likely UoA submissions. • Additionally, maintaining the current UoA structure allows for benchmarking on progress (or otherwise) of submitting units from the previous REF to the current REF period, which is good for institutional review and planning.
140	<p>Engineering is an exceptionally diverse discipline, as a consequence it has always presented a challenge for UOA configuration. It was clear from the Academy's considerable engagement with the engineering community in the run up to the design of REF 2021 that there was no consensus view on the optimal UOA configuration for engineering. The community was hopeful that a single UOA for engineering would allow the dynamic and collaborative nature of engineering research to be better captured. Concerns raised by the use of a single UOA for engineering were around the inadequate visibility of all engineering disciplines, averaging of results and insufficient size and breadth of expertise across the sub-panel. However, these concerns were not realised.</p> <p>The use of a single UOA for Engineering for REF 2021 was a big change, but one that was broadly successful, and we recommend retaining it for REF 2028.</p> <p>Operating such a large panel and assessing a very broad range of outputs had challenges, as noted in the Main Panel B report: 'challenges in operating at such scale e.g., managing large plenary discussions and in observing subtle changes in sub-disciplines within engineering' . There are lessons to be learned on ways of working, which should be addressed as part of the consultation on panel criteria expected in Summer to Autumn 2024 once the panels have been appointed. The Royal Academy of Engineering would be happy to facilitate such discussions.</p> <p>It was felt that improvements had been made in the assessment of interdisciplinary research in REF 2021, however it is right that the REF 2028 continues to ensure it is encouraging interdisciplinary submissions and assessing them well.</p> <p>The Main panel B report observes that 'there is scope to improve and simplify the taxonomy ahead of any subsequent exercise' . The Academy endorses this approach and would recommend engaging the wider engineering community in agreeing that taxonomy.</p> <p>Further consideration should be given to whether the UOA structure allows for adequate recognition and assessment of research on challenge-focussed approaches to societal needs, such as net zero and human resilience. EPSRC's Tomorrow's Engineering Research</p>

	Challenges identified the most important challenges that face engineers over the next 10-15 years and explored the engineering research needed to tackle these challenges. The report identified cross-cutting themes, such as 'understanding complex systems' and technological challenges, such as to 'develop sustainable, integrated and equitable transportation systems'.
141	<p>The UoA discipline-based approach remains conservative and works against interdisciplinary research and research units.</p> <p>UoAs in Panel D are more welcoming of interdisciplinary research and submissions than other main panels. It would be beneficial for institutions to decide what 'fits' within a UoA and the UoA to determine fair assessment, rather than UoAs 'drawing lines' on what fits within a unit. The increased weighting of the environment section could otherwise work against UoAs with interdisciplinary environments.</p> <p>We would support exploring the feasibility of creating 'general' UoAs, similar to 'general engineering' in REF2014 which became the engineering UoA in REF2021.</p>
142	We do not propose any changes to the UOA structure.
143	<p>The University of Central Lancashire supports the FRAP's proposal that "REF 2028 will retain the REF2021 Unit of Assessment structure and will include advisory panels on Equality, Diversity and Inclusion, and Interdisciplinary research" - in particular, we note this with regard to UOA25 Area Studies, where there appears to be some underlying concerns within the wider community as to its continuation. While other UoAs may receive some work in area studies, recent and ongoing developments within Area Studies as a discipline, and internationally, means that it remains vital it is retained as a discrete unit of assessment. Given the diverse topics covered by UOA3, we would welcome the ability to make multiple submissions to this UOA. Whilst the inclusion of output sub-profiles for different components, provided as part of the REF2021 confidential feedback, gave invaluable information about the relative health of different components of our UOA3 submission, we believe that difficulties in articulation of research environment across several different sizeable entities that did not have a shared research environment was to our submission's detriment in terms of overall quality profile.</p>
144	<p>We welcome retaining the UoA structure.</p> <p>I include the following comments on ILS and DLS here as there is not an appropriate section within the consultation template, however it is a concern for our community.</p> <p>Institutional and disciplinary level statements These could disproportionately effect both small specialist institutions and units submitting to UoA32 from larger HEIS.</p> <ul style="list-style-type: none"> - For small specialist institutions it represents additional administrative burden. - For submitting units within larger multi-disciplinary HEIs, it is likely to produce additional tensions and pressures as the specialist nature of support required for creative disciplines with strong practice traditions may not be able to feature as strongly in institutional level statements constrained by word counts and the need for breadth of disciplinary coverage. <p>Clarity is needed as to where and by whom the relative weighting of the statements will be decided and at what point in the REF cycle this will be communicated.</p>
145	It is our very strong opinion that Sport and Exercise Science be moved out of UoA 24 (Sport and Exercise Sciences, Leisure and Tourism) and into its own UoA (entitled Sport and Exercise Science) and that this new UoA be moved into main panel A.

	<p>The rationale and evidence for the creation of a new unit is as follows.</p> <ul style="list-style-type: none"> - The reason for the original grouping of the Sport and Exercise Sciences with Leisure and Tourism appears opaque. Whilst historically this grouping may have been justifiable it no longer represents a logical grouping. - These areas appear to us to be grouped because historically they were perceived as being linked by the cultural phenomenon of recreation. That is sport, exercise, leisure, and tourism are linked because they are what some people do to recreate. However, they are not linked by a shared epistemological paradigm nor by a common research method. Sport and Exercise Science has matured into a STEM subject as evidenced, by example, by the content of the Journal of Sports Science and the content of the annual BASES conference in the UK. <p>The rationale and evidence for moving the Sport and Exercise Sciences into Main Panel A is as follows</p> <ul style="list-style-type: none"> - It strikes us that the first defining characteristic of Panel A is that the UoA are STEM subjects. As argued above Sport and Exercise Science is a STEM subject. As further evidence of this i) BASES is an active member of the Science Council and ii) BASES accredits 17 laboratories. - The second defining characteristic of Panel A, as we perceive it, is that the UoA are medical or health related. Therefore, it should be noted that i) research in Exercise Science is having a significant impact on health policy and in clinical settings, ii) research in Sport Science is underpinning areas such as return to play after concussion and iii) BASES has recently incorporated Clinical Exercise Physiology into its structure. <p>We do appreciate that you may be reluctant to add to the existing number of 34 UoAs. However, we believe that i) consideration should be given to doing so as it would help maintain the UK's world leading research position in Sport and Exercise Science and ii) it may be possible to 'partner' leisure and tourism with another UoA.</p> <p>Given the importance of this proposal and its implications we would welcome the opportunity to meet with you to discuss it. We can be contacted at [REDACTED]</p>
146	<ul style="list-style-type: none"> • The retention of the current UoA structure without any further amalgamations is supported.
147	<p>The structure itself is good.</p> <p>The different workload for different panels was a concern in REF2021 and remains a concern and it would be good to know how this will be addressed.</p>
148	<p>In general, the stability introduced by the retention of REF 2021 UoA for REF 2028 is welcomed.</p> <p>This is especially important given the replacement of discrete Engineering units in REF 2021 with the single UoA 12 Engineering for REF 2028.</p>
149	<p>Specifically, in relation to UoA 25/26: it would be beneficial to have a unit that covers a wider range of languages. UoA26 is traditionally European in focus, which does not reflect the language areas researched by many languages Departments/Schools across the country. This does not necessarily mean that UoAs 25 and 26 should be amalgamated. Rather, we recommend that UoA 26 should have its descriptor extended to include non-European languages, and so more accurately reflect the spread of languages in departments. While not a disciplinary development the proposed broadening of underpinning research</p>

	needs to be equitably applied across main and sub panels. An area of concern raised in REF2021 was the differentiated approach to non-standard outputs across the sub panels e.g., it would appear that UoA 33 Music did not score compositions as highly as standard academic outputs.
150	As a sector-wide body we do not feel able to contribute to this question.
151	<ul style="list-style-type: none"> • We strongly recommend that Humanities becomes a single unit, replacing individual units, as the Humanities landscape across much of the sector is currently challenging with falling numbers of undergraduate students. We believe there would be sector-wide interest in submitting to a general Humanities unit rather than individual discipline units. This would contribute to the vitality and sustainability of these disciplines which are often co-located and part of the same research environment. It would be easier to enhance research culture in a larger unit and to write the PCE statement. In particular it would also reduce the burden on discipline-specific units which often now have low staff FTE. There is precedence for this request, as previous exercises have concentrated disciplines such as engineering; in addition, institutions have been expected to submit single submissions to units with wide-ranging descriptors such as Allied Health Professions, rather than splitting submissions across individual disciplines. This change would be timely given the current pressure on the Humanities across the sector.
152	<p>- There may be some merit in reconsidering the title of the UoA 20: Social Work and Social Policy to something like 'applied social science and social policy' or 'applied social research and social policy' as this seems to more accurately capture the inter-disciplinary nature of research in this UoA. The current title moves from the very specific (social work) to the very general (social policy). Having the broader social research/science tag would emphasise that research in this UoA can be broader than 'policy' or include 'practice' and wider application of social work - but still stressing that this UoA is about research that is applied and therefore distinct (though clearly overlapping) from other cognate areas like politics, economics, sociology, law.</p> <p>- However, some relaxation of the additional burdens of demonstrating Independent Researcher status for Main Panel A would be welcome to ensure parity between UoAs.</p>
153	<p>Our field is diverse, and the titles attached to what are currently Units of Assessment 33 and 34 are inevitably a little unwieldy and imprecise. Our consideration of this is governed by the following principles:</p> <ol style="list-style-type: none"> 1. The remits for panel assessment provided in Guidance published for the REF must make very clear what work will be anticipated by which sub-panel, even where sub-panel titles are inevitably a little uncertain; 2. Submissions should be able to present the best and most accurate picture of their research activities in a way that reflects the structure that has evolved within the institution, rather than be forced artificially to dismember them to attempt to map onto UoA boundaries; 3. No disadvantage should accrue to a submission because of its choice of UoA to which work is submitted. <p>Our primary concern is with the current separation of work between UoA's 33 and 34. This worked because of the active co-operation between these two sub-panels, but is far from optimal. The title of Sub-panel 33 (Music, Drama, Dance, Performing Arts, Film and Screen Studies) signals a set of activities described by the first part of its name, but much that falls more naturally under the remit of sub-panel 34 (Communication, Cultural and Media Studies, Library and Information Management). Many researchers in our field would not see a fundamental distinction between 'film' and 'screen' on the one hand, and 'media' on the other, though of course both sets of terms are in practice subject to continuing social and historical revision. For these reasons we would recommend that sub-panel 33 focus on</p>

	<p>Music, Drama, Dance, and Performing Arts, while sub-panel 34 becomes more coherent as Media, Screen and Cultural Studies; Library and Information Management, with the Guidance on remits making clear that the latter includes what in some institutions is entitled screen studies, or film studies (recognising the sometimes distinct institutional and intellectual history of the latter two in the UK but nonetheless ensuring that all these areas are considered together), as well as other cognate areas like journalism, political communications, film and television studies, popular music studies and games studies. This would also require that the membership of the sub-panel is so constituted to be able properly to assess all these areas of research, and the range of methodologies deployed (including by practice-based researchers), a matter in which this subject association anticipates taking a close and active interest in due course.</p> <p>We recognise that Library and Information Management is a distinct field, often situated in a separate department or even faculty, from those represented by our members. However it is also recognised that the size of LIM makes it unsuitable as a separate stand-alone UoA, so (although this is primarily a matter for researchers in that field) we accept this field is likely to 'co-habit' with our own.</p> <p>These recommended changes have implications for the relative work-load of sub-panels, and we have, as far as possible, considered this carefully. The panel overview reports of the 2021 REF note that for UoA33 "16% of the outputs submitted...were in the broad areas of film and screen studies", while that for UoA34 notes that "We received very substantial submissions in Film, Television and Screen Studies and Cultural Studies, with large submissions in Journalism and News, Media and Cultural Theory, Creative and Cultural Industries, Gender and Sexuality, Political Communication and Popular Culture." UOA33 had 3,707 outputs, so that 16% of outputs would be around 593. UOA34 had 3,207 outputs; adding 593 would make it 3,800 (or approximately an 18% increase). In the context of the range of output numbers in Panel D in 2021 - Panel D had a total of 34,920 outputs with UOA29 (Classics) the smallest (1,070 outputs) and UOA27 (English) the largest (6,519 outputs) - these are clearly manageable changes.</p>
154	<p>- We broadly support the continued use of the REF2021 UOA structure however:</p> <p>- Our Department of Psychology has not been fairly represented in previous REFs. We continue to support the development of a unique UOA that captures the broad fields of research within Psychology. This is primarily research in Developmental, Cognitive, Neuroscience, and Social. REF currently favours Cognitive and Neuroscience and these fields dominate the REF output submissions. We feel the inclusion of "Psychiatry" within the UOA leads to a comparison between institutions on this UOA that are not within the same field. As such, the results for this UOA require careful unpacking to fully understand different types of "Psychology" Departments.</p> <p>- In some cases, UOA descriptors could benefit from further clarification to ensure that submissions are made in the most appropriate unit and assessed by sub-discipline experts – this is particularly true in those large UOAs spanning a wide-ranging discipline (Psychology and Engineering for example). It is important that HEIs that have smaller or more focused research activities within the discipline are not disadvantaged when compared to larger HEIs that might have multiple departments dedicated to this unit's discipline.</p>
155	<p>The stability of an unchanged UoA structure is welcomed. It has been raised that more recognition of interdisciplinary thematic work, e.g. on climate change and net zero or poverty and justice would perhaps be better reflective of the ways in which universities are increasingly focusing on interdisciplinary themes. The distinction of balancing the thematic</p>

	with disciplinary assessment is appreciated. While this has the potential to be somewhat burdensome, approaches to capturing and understanding the wealth of research and its strengths in relation to certain themes would be beneficial to the sector. For example, might there be potential to consider requesting tagging research outputs or case studies by certain themes, e.g. climate change, for further enhanced insights to the UK's research strengths.
156	The UoA structure is appropriate and institutional systems are set up for the current UoA structure. Changing this structure is unnecessary and would add burden for institutions, system developers and statutory returns.
157	The proposed Units of Assessment seem reasonable to us, but it seems to us that the issue of interdisciplinary research remains a matter that requires continued detailed, very careful consideration in REF.
158	<ul style="list-style-type: none"> • To maintain the credibility of the REF, we want to stress the importance of the UOA panels having wide-ranging expertise to cover the breadth of disciplines being assessed and that is proportionate to the amount of research in that particular area in an UOA and that any conflicts are taken into account when ensuring their sufficient expertise. For example, in REF 2021, there were examples where certain individuals with relevant expertise for a particular UOA submission were conflicted (e.g., substantive connections to the institution in question) and thus there was little remaining expertise in that area on the panel once the conflicted members were excluded. This disproportionately affects small and specialist providers.
159	Psychology departments usually operate independently of clinical psychiatry and neuro units within medical schools. The current UoA, within Panel A, does not meaningfully reflect the nature of research in many research units that would identify themselves with Psychology. We recommend consideration of a separate UoA for Psychology.
160	<ul style="list-style-type: none"> • Continuation of the previous panel structure is helpful because it allows strategic planning to be organised around areas viewed as 'core' by funders, while also allowing us to ensure we can provide high-quality support to ensure that researchers whose work is not necessarily aligned 'cleanly' with those 'core' areas to also flourish. • Depending on the guidance on interdisciplinarity, some changes may be desirable to ensure cognate disciplinary areas are better grouped together, such as in relation to screen and media studies (Sub-Panels D33 - Music, Drama, Dance, Performing Arts, Film and Screen Studies – and D34 - Communication, Cultural and Media Studies, Library and Information Management). • Despite the additional challenges to managing the single Engineering UOA (compared to smaller submission or single-department UOAs), we would recommend keeping the UOA structure as it was for REF 2021.
161	<ul style="list-style-type: none"> • We are content with the current UoA structure and would prefer it stays the same as the burden of changing UoAs in various systems and returns (e.g. Hesa) is burdensome.
162	<ul style="list-style-type: none"> • UOA 4 is dominated by psychology submissions by volume but is dominated by neuroscience in terms of REF results. This is having a distorting effect on Psychology as a discipline, with many institutions choosing not to submit psychology research to UOA 4. • In REF2021 UOA 22, Social Anthropology was grouped with Development Studies. HEIs with submissions that included both disciplines scored well, particularly on impact, placing Anthropology-only submissions at a noticeable disadvantage. Informal versions of the rankings emerged within the disciplines: the UOA versus the UOA minus Development Studies. • For UOA 26, the pairing of Linguistics with Modern Languages skews results. It is clear

	from REF results that UOAs with strength in Linguistics score more highly. We would therefore like to see Linguistics in a separate UOA.
163	We are content with the current UoA structure. As a specialist institution we submit to a single UoA, and would not wish to see it subdivided.
164	The University of Brighton fully supports retaining the REF2021 Unit of Assessment structure, particularly in light of the need to complete early UoA modelling with HESA data.
165	No changes proposed.
166	N/A.
167	The University of Bristol does not propose any changes to the Unit of Assessment structure for REF2028.
168	We very much welcome the proposal to retain the REF2021 UoA structure. It is important for the health of disciplines and their future development that UoA structures enable small subject areas to be returned. This does create a burden for institutions but the alternative of amalgamating into broader more homogeneous submissions would risk the long-term survival of some disciplines.
169	<p>- We are broadly content with the UoA structure and believe the continuity with REF 2021 is a positive thing.</p> <p>- We have concerns with regard to equity about the variance in UoA structure in Main Panel D. It is important that the panel structures are equitable. Some single subject UoAs have very small submissions – and notably there were cases of a marked reduction in submissions from REF 2014 to REF2021.</p> <p>- We are concerned that there is a lack of consistency in previous decisions made to combine disciplines into UoAs, and that this results in the perception that some disciplines are more equal than others, or more inherently deserving of rigorous assessment. We would welcome further consultation with disciplinary communities and a more fulsome exploration from an EDI perspective of how such decisions may exclude or marginalise those disciplines. For example:</p> <ul style="list-style-type: none"> - The rationale for bringing Music and Drama together was around avoiding small panels but this rationale doesn't appear to have been applied consistently across the board. - The continued combination of psychology, psychiatry and neuroscience under UoA4 will further marginalise psychology disciplines which are not medical, biological or experimental in focus. - The continued incorporation of some substantive disciplines, such as criminology, media studies and screen studies, into wider UoAs, whilst other disciplines such as Classics retain their own discrete UoA, may have impacts on the identities of these disciplines. <p>- We also have concerns around the consequent workload implications for certain very large subpanels. The statistical data in the Main Panel D report demonstrating the size of the different submissions and the membership of the subpanels in the public domain allows us to observe that the workloads were not even. Equity and inclusion necessitates an understanding of the consequences of this.</p> <p>- Should the UoA structure remain, panels need to be resourced appropriately, recognising the very different scales of the units of Main Panel D. The workload must be consistent for transparency and equality. It feels important to note the implications in burden for the subpanels as well as the institutions of the measures proposed.</p> <p>- What is proposed here is a very different exercise from REF2021 and we would urge that the funding bodies ensure appropriate and measured training for the subpanels.</p> <p>- Finally we want to highlight that whilst we know the funders dissuade league tables and rankings of results, this inevitably occurs post exercise. In such rankings single UoA submissions are often omitted, and the UoAs are the public face of the disciplinary groups - in short all nuance is lost. We commend that funders considers the optics of grouping, or</p>

	not grouping, some disciplines together, and the effect this has on the health of those disciplines.
170	Retaining the UoAs in their current configuration is considered to be prudent given where we are in the REF cycle. We would though potentially advocate, in the longer term, reducing the subject siloes that the extant 34 UoAs have created and/or creating a new inter-disciplinary UoA.
171	We support the UoA structure proposed.
172	The continued combination of psychology, psychiatry and neuroscience under UoA4 will further marginalise psychology disciplines which are not medical, biological or experimental in focus.
173	Overall this is positive, however, we would be in support of proposals to change Social Work and Social Policy to something closer to Social Policy and Practice, to more broadly reflect the scope of the unit, rather than framing it too exclusively in the context of Social Work.
174	<p>Participants were broadly happy with the current UoA structure, noting that most university departments and physiologists themselves were familiar with the current system and hence, the consensus was that the current UoA structure should be retained.</p> <p>However, some participants were concerned about the current UoA structure due to the lack of an obvious critical mass of physiology in any one UoA. This could be beneficial in showcasing physiology as an interdisciplinary science having robust representation across several UoAs. This also means that physiology has been judged against a variety of different research and outputs depending on the UoA they were submitted in.</p> <p>Participants were also concerned about research that did not fit within any specific UoA criteria owing to advancements in the field. For example, the use of artificial intelligence and computing within physiological research. To tackle this, it was suggested that a potential change to the UoA structure could include having a matrix structure based on the crossover between basic science and its practical applications. This method would be more beneficial towards research spanning multiple UoAs; as the current system can be constricting.</p>
175	We are supportive of continuing with a similar UOA structure to that of REF 2021.
176	<p>No changes are proposed to the UoA structure.</p> <p>However, we note the following three concerns relating to the History UoA:</p> <ul style="list-style-type: none"> ● that HESA staff record data are currently insufficient to capture historians working in the discipline across an institution and beyond departmental boundaries. This is particularly acute for historians who work widely across AHSS and STEM, e.g. in law, business and medical schools. ● it is critical that the assessment of the People, Culture and Environment section in particular is carried out in relation to the size and type of institution. If not, it will be very difficult for small units to do well, making the argument for a single Humanities submission more plausible, to the significant detriment of the History discipline and its staff. We strongly propose that the final requirements allow for difference, so that both large and small UoAs can be ranked as excellent, as the best mitigation for this. ● we are very keen to ensure this same appreciation of size, between institutions, is also recognised in assessment of the institutional-level statement for People, Culture and Environment. It is vital that outstanding research excellence achieved by units in less well-resourced institutional environments is fully recognised.

177	Our members are unanimous in the view that the UoA structure for Business & Management should remain unchanged. The panel must be broad by necessity due to the diverse range of fields covered within the Business & Management domain. It was noted that the potential for change to UoA structures is limited if people wish to compare results between different REF exercises.
178	The UoA structure for REF2021 seems fit for purpose and continues to adequately reflect HE research disciplines. It is also a benefit to have as much continuity as possible from one REF exercise to the next so the proposal to retain the UoA structure is welcome.
179	<p>For Psychology as a discipline, it should be ensured that the UoA is inclusive of and appreciative of a range of approaches/methodologies to represent the breadth of Psychology (particularly including qualitative and critical approaches). We know from our examination of the 2021 REF impact case study database that Psychology is a diverse discipline with diverse impacts, and is valuable to a wide range of other disciplines. Impact case studies referencing Psychology were submitted across 31 different UoAs, most commonly (aside from UoA4) to the Allied Health Professions, Dentistry, Nursing and Pharmacy UoA, Business and Management Studies UoA, and Sport and Exercise Sciences, Leisure and Tourism UoA. The diversity of Psychology is a strength that should be celebrated in the REF in a UoA that is inclusive of this diversity. However, there are concerns within Psychology about the fracturing of the discipline. There were concerns about this in the last REF cycle, and these have not gone away.</p> <p>Concerns about the fracturing of the discipline have led to calls by some for a separate UoA for Psychology. Some have expressed concern about the lack of value seemingly given to some areas that sit within Psychology, and a view that the UoA4 statement from the 2021 REF de-prioritised Psychology in favour of Psychiatry and Neuroscience. A cursory look at institutional submissions suggests that submissions without the Psychiatry and Neuroscience components did less well, indicating the relative underweighting of Psychology within this UoA. Rules broadening the scope for including more of what was perceived to 'do well' last time will push out areas that people feel did 'less well'; there is a risk that this could narrow what is deemed as good research, rather than encourage diversity. We believe that a diverse discipline is a strong discipline.</p> <p>There are various potential ways in which concerns about the fracturing of Psychology could be mitigated by the REF. This includes ensuring the make-up of the UoA4 panel is representative of the diversity within the discipline, further bolstering of cross-panel scrutiny of returns, more coherent reporting of Psychology performance across UoAs, and greater consistency of standards.</p> <p>An issue for UoA4 is a lack of clarity on what a 'good' paper looks like. The guidelines on what constitutes 3 or 4* have not been updated in a long time, and are very brief. It would be more democratic for clearer criteria to be published.</p>
180	No comments.
181	NCUB has previously worked with other organisations, including the Physiological Society, on the importance of recognition for interdisciplinary research including that which results in non-traditional research outputs. Consequently, we welcome the continued inclusion of the advisory panel on Interdisciplinary research. We propose no specific changes to the REF2021 Unit of Assessment structure but welcome the question and the recognition of the need to regularly review these structures.
182	MSC welcomes the approach to retaining the UoA structure from REF2021. However, interdisciplinary research can be difficult to reward under the framework of REF 2021. As reported by the IDR Advisory Panel's final report, the IDR 'flag' on outputs was not

	<p>consistently applied by HEIs, leading to a lack of reliability in identifying interdisciplinarity.</p> <p>It is also crucial that the advisory panels on equality, diversity and inclusion are retained and they should be empowered to influence the final quality profile with their assessments. It is pleasing to see in the initial decisions that REF2028 will build on learnings from the final report of the Equality and Diversity Advisory Panel from REF 2021. Particular attention should be paid to EDAP's call for greater diversity on the panels, and there could be a consideration of its suggestion to introduce recommended targets for under-represented groups, for nominating bodies and/or panel chairs.</p> <p>Relatedly, if there is an ongoing investigation or evidence of research fraud, misconduct or bullying within institutions, it is important that panels consistently have access to information about this to inform their assessments. From the perspective of monitoring EDI and the cultural environment of institutions, it will be particularly important for panels to gain information on misconduct and staff treatment issues, which disproportionately affect groups with protected characteristics.</p>
183	<ul style="list-style-type: none"> • There are some concerns at LSE about how the REF treats Development departments as part of a combined Anthropology and Development UOA. The REF2021 sub-panel contained only a small number of non-anthropologists and therefore the pool of expertise for assessing non-anthropological development research is smaller. Ideally there would be separate sub-panels for Anthropology and Development Studies. • We would like to ask for clarification as to whether a mechanism to request multiple UOA submissions will be available again for REF2028.
184	<ul style="list-style-type: none"> • The UK Committee on Research Integrity has heard from across the sector that the difference in size of units of assessment may mean that there are inequities between units. There is potential impact on panelists and assessment consistency when panels have considerably different workloads. • Units of assessment vary considerably in their size. We suggest a need to consider how to support parity between disciplinary areas. • In relation to the different sizes of units of assessment we suggest a need to provide transparency about why certain disciplines remain amalgamated in units while others are not. Amalgamation of cognate sub-disciplines may enhance consistency and reproducibility of assessment. In addition, amalgamation of some smaller units of assessment may remove barriers to collaboration in research itself, and in many cases better reflects internal structures in higher education institutions.
185	<p>In principle, the cross-disciplinary constitution has worked well for music and there are no concerns if these are retained.</p> <p>A concern is simply the serious difference in size of disciplinary fields within Main Panel D. Subpanels were asked to assess widely different volumes of outputs in REF2021. This can easily lead to a lack of parity in the assessment process and we would suggest that the size of the panels is reconsidered for REF2028 to allow for parity in the scrutiny process. Across panels, equal time and attention must be given to the work.</p>
186	We are satisfied with the UoA structure.
187	We don't propose to make significant changes
188	AHA affiliates are generally happy with the UOA structure of REF2021 and the good working relationships that were established between panels in that exercise. They also caution against making any changes to UOA structure at this stage in the process - consideration of any changes to the nature of disciplines/fields can be addressed in the descriptors for the

	panels and careful consideration of who is selected to sit on panels. There is strong endorsement for the continued existence of UOA25 Area Studies and the Advisory Panel on Interdisciplinary Research to mitigate the heavily disciplinary nature of the underpinning structure of the exercise.
189	Continuity in the structure of UoAs makes sense at this stage in the assessment period.
190	<p>We are comfortable with the continuity of UOA structures from REF 2021 with the following caveats:</p> <ul style="list-style-type: none"> • Those panels which have historically considered requests for multiple submissions continue to do so. The implications of how this would be reflected in HESA data will need to be considered. • Multi-disciplinary UOAs which provided discrete quality sub-profiles in REF 2021 should continue to do so where requested by submitting HEIs. • The funding bodies should seek to drive consistency of approach across panels unless there is a clear disciplinary justification for variation of practice.
191	N/A
192	There are no plans to change the UoA structure.
193	<p>Nursing falls within UOA3, which is a very broad grouping in terms of the mix of disciplines. There is a danger of nursing, which is a large discipline in its own right, becoming 'hidden' among these other disciplines. A review of impact case studies in the Ref2021 that related to nursing shows that research led by nurses has been submitted to other UoAs than 3 and that this may reflect a growing trend toward more interdisciplinary research. The panel should reflect this shifting profile and include a range of people who are research active as well as being in senior management roles. The discipline level statement must permit the strengths of each of the included groups to be highlighted clearly and this should also be reflected in the institutional level statement.</p> <p>It is important that the diversity in this UoA is captured and also mirrored within the assessing teams. This includes a wider range of ages, ethnicities, and other protected characteristics.</p> <p>Impact of the Covid-19 pandemic The funding bodies intend to retain the statements on Covid impact that were used in REF 2021, and to require some consideration of how Covid impacts have been addressed in output selection as part of Codes of Practice.</p>
194	We are happy with the UoA structure as proposed and find it helpful that there is continuity from REF2021 in this respect, which is helpful for long-term strategic planning.
195	Currently UOA 12 includes Dept Engineering, Dept Chem Eng and Biotech and Dept Materials Science. This worked well in REF2021 and we are content to maintain the status quo.
196	<p>The university will keep under review the need to streamline UoAs and will also consider joint submissions with other Universities.</p> <p>The vast majority of work submitted to Sub-Panel 24 would be a better fit with Main Panel A. Although the subject merits a sub-panel, the working methods of Main Panel A would be more appropriate.</p> <p>The overlaps between UoA 32, 33 and 34 should be streamlined.</p>
197	We welcome the proposal to retain the REF 2021 Unit of Assessment structure.
198	As we stated in response to question 5 above, the importance of public service policy, delivery and assurance is demonstrated by its representation across a wide range of units of assessment included in REF 2021, for example A2, C13, C16, C17, C18, C19, C20, C21, C23 and D34. Our research indicates that 30-40% of the impact case studies in C17 (Business and

	<p>Management Studies) have a public administration link. Government spending accounts for between 35-40% of UK GDP and employment in the UK public sector (excluding private or third Sector organisations that operate many public services) is 15-20% of the total workforce (and higher in the devolved regions).</p> <p>New QAA Subject Benchmark Statements are currently being developed for Public Policy and Public Administration (UG and PG). This elevates the visibility of the disciplines. Further, the most recent Benchmark Statements for Business and Management (undergraduate and postgraduate) published in March 2023 make significant reference to management across all types of organisations “including, for example, public, private, non-profit, community-based and social enterprises”. The content of undergraduate business and management degrees also, for the first time, note that graduates should reasonably be expected to be able to demonstrate knowledge, understanding and critical evaluation” in areas including:</p> <p>“Public and non-profit management: the distinct roles and practices of public service organisations and the voluntary and community sector, including approaches to governance, financial management, public leadership, community empowerment, coproduction, public values and ethics and hybrid organisations for public service delivery.”</p> <p>We therefore suggest the following definition for the descriptor of the appropriate Unit of Assessment for REF 2028, and greater visibility for the discipline in forthcoming detailed REF guidance.</p> <p>Public administration, in all of its forms and practices, includes (but is not limited to) public management, public leadership and public governance. It is the study of the planning, allocation, use and evaluation of public resources. In this way, public administration encompasses the institutional architecture and processes that are required to implement public policy.</p> <p>It is important that all UoAs with strong links to public administration research, particularly UoA C17 Business and Management Studies; C19 Politics and International Studies and C20 Social Work and Social Policy, include this definition to ensure consistency and appropriate visibility.</p>
199	We see no problems with these arrangements.
200	<ul style="list-style-type: none"> • UoAs should be of comparable breadth, scope and scale, as otherwise there is a risk of lack of fairness in assessments.
201	Agree with the proposal to maintain the Unit of Assessment structure from REF 2021.
202	<ul style="list-style-type: none"> • The structure is fine. • We would urge the tightening of UoA boundaries to limit the number of overlapping areas and the potential for outputs to be submitted to multiple UoA.
203	Yes, we support the current structure and do not have suggested changes to it.
204	<p>We recommend that the potential for a UOA in Forensic Science is considered again. In REF 2021, outputs that embodied forensic science were flagged to help ensure appropriate assessment and to enable panels to review the health of UK research in this field. The guidance on submissions stated that this would generate an outputs quality sub-profile for forensic science across the exercise but this did not materialize and the lack of a forensic science UOA failed to highlight the quality of research and the research environment in this field.</p> <p>However, with UKRI now providing significant funding for this field through its recent forensic science for the justice system sandpit, as well as other funders providing grants</p>

	within this space, a more credible funding landscape for forensic science is emerging. Forensic science also has a significant advantage in regard to interdisciplinarity work and lends itself very well as a discipline to impact. In combination with the proposed changes to REF enabling contributions from a wider range of staff (if implemented), there is therefore a strong case for reconsidering the inclusion of forensic science as a UOA in its own right.
205	Over the last few Assessment Exercises, the UoA structure for Business and Management has generally worked well. However, the submissions size (e.g., the number of outputs, impact case studies, etc) and the breadth of fields covered under Business and Management domain continues to grow. The observations from REF 2021 suggest that more resources (including more members) should be seriously considered for this sub-panel to diligently handle the enormous workload.
206	NA
207	No changes to UOA structure required.
208	<ul style="list-style-type: none"> • There could be some further thought applied to the boundaries between Sociology and Social Work and Social Policy and whether there could be some efficiencies here particularly given the new rules that will allow for outputs to be submitted to multiple UoAs.
209	No changes proposed.
210	We do not have any suggestions for a change to the UoA structure and indeed would prefer continuity with REF 2021. We would, however, welcome some updating of panel descriptions and consideration of panel membership in this regard – for example, around the relation between UoAs 25 and 26, which currently relies on an increasingly problematic distinction between European ‘languages’ and non-European ‘areas’.
211	In REF 2021 Unit of Assessment 20 (Social Work and Social Policy) covered a broad range of subject fields, with the emphasis on social work, social policy and criminology. We do not consider that changes are required to the UoA structure.
212	<p>While overall the UoA structure has worked well there are individual, discipline specific interests to note:</p> <ul style="list-style-type: none"> -UoA4 is seen as a mix of disciplines, which itself is felt as entailing either unhelpful competition or, conversely, as supporting cross-area mixing. -There is a pronounced interest amongst Criminologists to explore the possibility of creating a distinct UoA for Criminology. During the last REF cycle, for instance, a survey carried out by the British Society of Criminology noted that: “Criminology is not named in a Unit of Assessment (UoA) within the REF process even though it is a flourishing discipline, [...] and free text comments demonstrated that some members feel disaffected by the non-naming of criminology in an assessment panel within the REF” (Harris et al, “How Criminology is taught and research today” (2019) Papers from the British Society of Criminology 19, 106 at 133). A Criminology UoA would recognise the commonality of work across Criminology, allow for an evaluation of the scope and nature of Criminology research, and its contribution to the public benefit.
213	We are in agreement with the continuation of the REF 2021 UoA structure.
214	<p>The Academy supports the current UoA structure as appropriate. However, we heard from some Fellows that interdisciplinary research was difficult to reward under the framework of REF 2021. They reported a degree of subjectivity and inconsistency as to how panels assess interdisciplinary, collaborative outputs, with a seemingly high degree of discretion awarded to the panel chairs. As reported by the IDR Advisory Panel’s final report, the IDR ‘flag’ on outputs was not consistently applied by HEIs, leading to a lack of reliability in identifying interdisciplinarity. On this basis the Academy welcomes the removal of the flag system for the next exercise, and keenly awaits further consultation on what automated approaches will be used to identify IDR in the next exercise.</p> <p>It is also crucial that the advisory panels on equality, diversity and inclusion are retained and</p>

	<p>they should be empowered to influence the final quality profile with their assessments. It is pleasing to see in the initial decisions that REF2028 will build on learnings from the final report of the Equality and Diversity Advisory Panel from REF 2021. Particular attention should be paid to EDAP's call for greater diversity on the panels, and there could be a consideration of its suggestion to introduce recommended targets for under-represented groups, for nominating bodies and/or panel chairs.</p> <p>Relatedly, if there is an ongoing investigation or evidence of research fraud, misconduct or bullying within institutions, it is important that panels consistently have access to information about this to inform their assessments. From the perspective of monitoring EDI and the cultural environment of institutions, it will be particularly important for panels to gain information on misconduct and staff treatment issues, which disproportionately affect groups with protected characteristics.</p>
215	For the upcoming REF2028, while we appreciate the continuity of the UoA structure, it is essential to recognise the evolving nature of research. With the emergence of data-driven research and the increasing importance of interdisciplinary collaborations, the REF should ensure that its structure is inclusive. It should cater to multidisciplinary inputs, not be limited rigid disciplinary boundaries, to truly capture the essence and breadth of modern research landscapes.
216	Maintaining the UoA structure's continuity is advisable. However, as research increasingly gravitates towards team science and interdisciplinary approaches, it's vital to accommodate outputs that span multiple disciplines. My past experience with panels suggests they are open to broader disciplinary inputs without being confined by strict definitions. Nonetheless, outputs and impacts should remain relevant to the UoA, in outputs, impact, and environment.
217	• Nothing to add
218	No changes are proposed
219	Statistics is a broad cross-disciplinary science and we expect to see statistical research continuing to contribute strongly to REF submissions in many UoAs. Having said that, it is essential that there is a UoA with adequate expertise to assess research in core theoretical, methodological and applied Statistics. In REF2021, UoA10 Mathematical Sciences fulfilled that remit and we see no reason to suggest a change, on the understanding that the assessment panel continues to have the expertise and capacity to assess research across the breadth of our discipline. The expansion of data-driven research across many fields requires that panels generally have sufficient statistical expertise to assess the quality of that research. Finally, there are areas of broader Data Science for which a Mathematical Sciences UoA is unlikely to be an appropriate submission route, for example data science ethics. Careful consideration needs to be given that UoAs are constituted so that such work can be assessed robustly.
220	We have no comments in response to this question.
221	The NIHR invests in health, public health and social care research. We note that the REF2021 UoA list, that is proposed to be used again for 2028, does not explicitly recognise social care research. We would advocate for more explicit recognition of social care research within the UoAs and suggest Unit 20 is amended to 'Social Work, Social Policy and Social Care'.
222	We have no proposals to make on the unit of assessment structure.