

Bangor University Code of Practice for the selection of staff for the Research Excellence Framework 2014 (REF)

1. Introduction

Bangor University (BU) is committed to equal opportunities. It does not discriminate on grounds of age, disability, race, religion or belief, sex or sexual orientation. Its Equal Opportunities Policy can be consulted at <http://www.bangor.ac.uk/hr/equalitydiversity/EqualityPolicyStatement.php.en>. BU is committed to ensuring that decisions about selecting staff for the REF are made in a fair, transparent and consistent manner. The present document, BU's REF Code of Practice, sets out the criteria and lays out the procedure BU will use when deciding who to submit for the REF.

2. Rationale

The purpose of REF is to identify the quantity and nature of excellent research being undertaken at each university in the UK. This is used to provide publicly available information at the level of Institutions and Disciplinary Units (which need bear no relationship to the organisational units of the institution) and to inform the selective allocation of each higher education funding body's grant for research to institutions (QR funding) from 2015-16. The assessment outcomes provide benchmarking information and establish reputational yardsticks. This quantitative information will be available for use in published league tables, by research funders as a threshold for entry to grant competitions, by funders of research studentships in UK and overseas and by individual staff and students when considering offers of employment or admission for study. The assessment also provides accountability for public investment in research and produces evidence of the benefits of this investment.

The REF is not a research audit; there is no expectation that institutions submit all eligible staff, or even all 'research active' staff. Although the names of staff submitted are in the public domain, no information on individual grades is recorded. The aim of BU's submission is to attain the most favourable outcome possible. Performance in the REF is important to the reputation and long-term viability of the institution and its academic units.

Inclusion or exclusion of staff from the REF submission will not be used in any performance review of individual staff members. Submission decisions are based on a snapshot of performance at a particular time. Furthermore, decisions over individual inclusion may be influenced by tactical considerations relating to the size and balance of a particular submission. As a general rule, for REF2014 BU will be making judgements on the basis of contribution to the number of 3 and 4 star outputs, contribution to impact and environment whilst taking into consideration the overall profile of the submission and the institutional profile.

3. CAT A definition

The Code of Practice details the process by which BU will make decisions regarding the selection of staff who are eligible for submission to REF2014 as Category A staff. To be

classified as a Category A member of staff you must hold a contract of employment with the University of 0.20 fte or greater, be on the payroll on the REF Staff Census Date of 31st October 2013 and have a primary employment function to undertake 'research only' or 'teaching and research'.

The decision regarding which eligible staff to select for submission is a University one; however, such decisions must be justifiable and not be the result of any unjust discrimination because of age, disability, gender identity, marriage and civil partnership, race, religion or belief, sex or sexual orientation or because they are pregnant or have recently given birth or due to part-time or fixed-term contracts.

We also stress that if an individual is not included in BU's submission to REF2014, this does not mean that the institution does not value that individual's contribution to BU.

4. Process

The decisions regarding eligible staff and REF submission will be made by the REF Task Group, informed by Mock REF exercises, College, School and Unit Research Committees. Some submissions may cover more than one School, Unit or College due to the subject coverage of the REF Units of Assessment (UoA). Directors of Research within each College who sit on the REF Task Group will be able to provide you with details of the research committees and staff involved within your College.

All members of the REF Task Group have received equality training through BU's Equality for Managers training courses. REF specific equality training will be provided by Human Resources.

Decision makers will consider a number of research factors when deciding if a member of staff is selected for submission to the REF. These are explained below.

a. Gathering information on outputs, impact and environment

For each member of staff who is potentially returnable as Category A, BU (usually the individual plus representatives from the school, department or self-funded unit) will compile an agreed list of publications, any contribution to non-academic impact within their unit, and their contribution to the research environment of their unit. Any dispute about the eligibility of any piece of research output will be resolved by the REF Task Group. This information will be examined during the annual Mock REF exercises.

b. Mock REF Exercises

In preparation for the final submission BU will carry out annual Mock REF exercises. In this process eligible research outputs from members of staff will be assigned grades using the REF star system as modified by subject-specific criteria, which have been agreed between the College, School/Unit and the REF Task Group. The grades will be discussed by the REF Co-ordinator, College Director of Research and one or more members of the REF Task Group. Grades will be based on work published or accepted for publication before 31st December 2013. Where applicable, grades will be

accompanied by a note of any likely substantial change, for example an output with a high probability of appearance in the REF window. Staff contribution to impact and environment will also be examined. The information gathered through the Mock REF exercises will be reported to the REF Task Group.

c. Feedback to staff

College Directors of Research will ensure that individual staff members receive general feedback on their research performance through the appropriate system within their College. The REF Task Group will issue individual letters to staff informing them whether or not they are to be submitted to the REF. The following schedule details the timescale for the letters:

- i. July 2012 - individual letters to staff from the REF Task Group stating whether they are to be submitted, decision pending¹ or not submitted.
- ii. July 2013 – individual letters to staff awaiting decision from 2012 from the REF Task Group stating whether or not they are to be submitted.
- iii. September 2013 – individual letters to staff awaiting decision from July 2013.

d. REF Task Group

The REF Task Group, with the approval of the Executive, will determine to which UoAs BU will submit, and the strategy for each UoA (for example, we might decide to design a very high quality select submission in certain UoAs where it is strategically important to achieve a high grade; conversely we might decide that it is important for a submission to be made in a given subject area with less concern about its quality).

By August 2012, the REF Task Group will assign every individual member of staff to a UoA, in discussion with the College Director of Research using material published by the REF2014 on panel boundaries and membership.

5. Individual circumstances

From May 2012 individual staff will be invited, if they wish, to provide a confidential completed pro-forma detailing matters relating to their ability to produce research output. BU and the REF Panels will take into account individual circumstances as listed below or any evidence that an equal opportunities issue has affected research output.

- a. Circumstances with a **clearly defined** reduction in outputs, which are:
 - i. Qualifying as an early career researcher (on the basis set out in paragraph 72 and Table 1 in annex C).
 - ii. Absence from work due to working part-time, secondments or career breaks (on the basis set out in paragraphs 73-74 and Table 2 in annex C).
 - iii. Qualifying periods of maternity, paternity or adoption leave (on the basis set out in paragraphs 75-81 in annex C).
 - iv. Other circumstances that apply in UOAs 1-6, as defined at paragraph 86 in annex C.

¹ The decision regarding staff submission may be pending due to outputs not yet being published or decisions regarding extenuating circumstances not yet resolved by the REF Equality Sub group or an unresolved appeal.

- b. **Complex circumstances** that require a judgement about the appropriate reduction in outputs, which are:
- i. Disability. This is defined in 'guidance on submissions' Part 4, Table 2 under 'Disability' (annex B).
 - ii. Ill health or injury.
 - iii. Mental health conditions.
 - iv. Constraints relating to pregnancy, maternity, paternity, adoption or childcare that fall outside of – or justify the reduction of further outputs in addition to – the allowances made in paragraph 75 below in annex C.
 - v. Other caring responsibilities (such as caring for an elderly or disabled family member).
 - vi. Gender reassignment.
 - vii. Other circumstances relating to the protected characteristics listed at paragraph 190 of 'guidance of submissions' or relating to activities protected by employment legislation.

Leave of absence may be considered as an extenuating circumstance depending on the individual case; study leave is expected to have produced research output(s) and so will not be so considered. Full details of REF's criteria of extenuating circumstances are given in the pro-forma and in annexes B and C.

Within BU, information that you provide on the pro-forma will only be seen by the REF Co-ordinator, Director of Human Resources, the University's Equalities Officer and Research Assessment Manager (REF Equality sub-group) and the Deputy Vice Chancellor (Research & Enterprise) who will have the final decision in complex cases. The REF Equality sub-group will manage the review process. All members of the group will observe strict confidentiality and carry out their duties with the utmost sensitivity. All information provided regarding staff circumstances will be stored securely.

If selected for REF submission, appropriate content from the form will be returned against individuals whose productivity has been affected by equality issues, confidentially, in form REF1b of the University's REF submission.

Any individual who claims and is subsequently deemed to have been disadvantaged by equality issues or extenuating circumstances will have their case examined by the REF Equality sub-group who will inform the REF Task Group of the number of outputs required for submission for that individual. The REF Task Group will then include the individual for submission if deemed appropriate. The decision will involve balancing individual and institutional interests.

6. Equality Impact Assessment (EIA)

The funding bodies require all HEIs to conduct an EIA on their policy and procedures for selecting staff for the REF to determine whether the institution's staff selection policy for the REF may have a differential impact on particular groups. An equality impact assessment (EIA) has been carried out on BU's REF Code of Practice; full details are given in Annex A. It

will be kept under review as submissions are prepared to ensure that any necessary changes to prevent discrimination or promote equality are taken prior to the submission deadline.

Shortly after individual feedback letters have been issued to staff, July 2012, July 2013 and September 2013 the Equality sub-group will also prepare an equality profile of staff eligible for submission which identifies who is and who is not to be submitted; this may give a quantitative check for any equal opportunities bias in the staff to be submitted for which protected characteristics data is available, if the numbers of staff are sufficient for a statistically valid analysis.

Shortly before the submission date, a final EIA will be conducted by the Equality sub-group to check that (a) staff not to be submitted have all been subject to an equal opportunities check and all appeals procedures concluded; and (b) that all staff to be included have been subject to an equal opportunities check and appropriate text inserted in REF1b.

If any EIA identifies discrimination within BU's policies or procedures the REF Equality Sub-Group in conjunction with the REF Task Group will explore alternative procedures that could be employed to mitigate the negative effect or justify the policy or practice within the constraints of the law. Both groups will also explore other solutions available to support the staff affected. If any policy or practice is found to have a positive impact on equality BU will seek to apply it to other areas of REF preparation.

The EIA will be published on BU's website after the REF submissions have been made in 2013. The published information will include the outcomes of any actions taken to prevent discrimination or advance equality.

Please see: Consideration of individual staff circumstances – covering note

Please see: Individual staff circumstances disclosure form - Pro-Forma

7. Appeals process

Those individuals not to be included will be informed and asked if they wish to bring forward any further evidence of equality-related impairment of performance or extenuating circumstances; staff may not appeal on the grounds of the perceived judgement of the quality of an output/s.

If further evidence of equality-related impairment of performance or extenuating circumstances are brought forward by a member of staff their case will be re-considered by the REF Equality sub-group and the decision on any reduction in outputs required for submission passed to the REF Task Group. If the view of the REF Task Group is still that they should not be submitted, they will be told and have the right of appeal to the Vice Chancellor, who will institute a rapid and independent review of each case within one month. He will convene an independent group of three senior academics, none of whom is on the REF Task Group, and none of whom has been involved at departmental level in discussing the individual.

8. Possible joint submissions with other HEIs

Bangor University welcomes collaboration with other HEIs in respect of REF submissions. All joint submissions must be credible and reflect well on all institutions involved. Any School or Unit considering joint submissions should inform the REF Co-ordinator or REF Manager no later than 31st July 2012 in order that the appropriate institutional agreements can be put in place before Bangor's submission intentions are returned to HEFCE in October 2012. BU's Code of Practice will be shared with other HEIs if a joint submission takes place.

9. The use of external assessors

When external assessors are consulted for individual UoAs they will be asked to comment on the quality of an individual's research only, they will not decide which staff are to be submitted or given any information relating to individual staff circumstances. External assessors will be made fully aware of BU's Code of Practice.

Notes

1. The Deputy Vice-Chancellor (Research & Enterprise) is appointed by the Vice-Chancellor and Council following a process of inviting applications and interview by the Vice-Chancellor. Training for the Executive, of which the Deputy Vice-Chancellor (DVC) is a member, includes equal opportunities.
2. The REF Task Group is chaired by the REF Co-ordinator (part-time secondment, delegated from the DVC) and includes College Directors of Research, the University Director of Research, the Deputy Vice Chancellor, the Research Assessment Manager and the Publications Officer. Membership and remit are scrutinised and if necessary changed by the DVC following consultation with the Executive. Its remit, membership and minutes can be consulted via <https://www.bangor.ac.uk/research/staff/REF2014>
3. REF1b is the prose section of each REF submission. REF1b is that part of REF1 which will not enter the public domain and where confidential issues pertaining to individuals can be documented.
4. Bangor University has policies and practices which support fixed-term (including contract) and part-time staff. These can be consulted at the HR website.
5. This document has been discussed with Heads of College, Heads of School, HR, Bangor's Equality Task Group and Bangor's Union Forum.
6. The Code of Practice, pro-forma and supporting material will be emailed to all academic staff and be available on BU's intranet from May 2012. Staff absent from BU will be contacted by their School/Unit or HR. Staff who join BU or whose circumstances alter after May 2012 will be directed to the documentation on the intranet.
7. Full details of the REF requirements for a code of practice are given in Annex B and Annex C.

BANGOR UNIVERSITY
EQUALITY IMPACT ASSESSMENT
TEMPLATE FOR NEW POLICY DEVELOPMENT

The process of Equality Impact Assessment should be embedded into new policy development in order that inequalities and discrimination are eliminated or addressed at the earliest opportunity

This checklist forms part of the university's approach to equality impact assessment and should be use assess the impact of the policy on groups with protected characteristics as outlined by the Equality Act 2010.

EQUALITY GROUPS:				
Age	Disability	Gender reassignment	Pregnancy and maternity	Welsh Language
Race	Religion and belief	Sex	Sexual orientation	Contract type
Early Career				

Note - The University does not at this time hold quantitative information relating to religion and belief, gender reassignment or sexual orientation.

POLICY NAME:

Bangor University Code of Practice for the selection of staff for the Research Excellence Framework 2014 (REF)

About the Policy:

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| <ul style="list-style-type: none">• What is the purpose of the Policy?• Who is responsible for the Policy?• How does the Policy link to the University's strategic priorities? | <ul style="list-style-type: none">• The Code of Practice details the process by which the University will make decisions regarding the selection of staff that are eligible for submission to the REF2014 as Category A Staff.• REF Task Group• Bangor University's Strategy document - commitment to Research Excellence• Bangor University's Equal Opportunities Employment Code of Practice – commitment to a fair and transparent recruitment procedure.• Bangor University's Strategic Equality Plan – Specific Duties (Wales) commitment to embedding equality and identifying equality objectives. |
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<ul style="list-style-type: none"> • Could the Policy be used to promote diversity and equal opportunities? • What quantitative or qualitative data is available to advise the Policy? 	<ul style="list-style-type: none"> • ECU review of the RAE identifying best practice examples • Data from “mock” REF exercises • Feedback and comments from consultation and communication with the various groups listed below.
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Consultation	
<ul style="list-style-type: none"> • What Groups have been consulted in drafting the Policy? 	<ul style="list-style-type: none"> • The University’s main decision making body – The Executive • The REF Task Group (which includes senior University staff responsible for research direction and decisions). • The Equality and Diversity Task Group (which includes representatives from equality groups, Union representation, Senior College Administrators, the Equality Officer, and HR Officers). • The Campus Unions Forum Working Group (which includes UCU) • HR and Staff Development • Heads of Colleges and Schools • Email correspondence to all staff inviting feedback • Presentations to and discussions with the above groups

<ul style="list-style-type: none"> • How will the Policy be implemented? • Who will be responsible for the implementation of the Policy 	<ul style="list-style-type: none"> • The Policy has been accepted by the Executive and has been implemented • A programme of raising awareness and communication will take place and will be ongoing throughout the REF period. • REF Task Group reporting to the Executive.
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Monitoring	
<ul style="list-style-type: none"> • How will the Policy be monitored to ensure that it is achieving its aims and that it does not disadvantage particular groups? • Who will be responsible for monitoring the Policy? • When will the Policy be reviewed to see if it is achieving its aims and objectives? 	<ul style="list-style-type: none"> • Data collected by the Draft submission and data from the REF Equality Group will be drawn based on equality groups. • This will include an analysis of the staff profile of those selected and those not selected for REF, and the outcomes of requests for special circumstance. • The REF Task Group • First review following the Draft Submission in spring 2013

Resource implications

<ul style="list-style-type: none">• Training – are there any training requirements associated with the development implementation or monitoring of this Policy? • What are the other resource implications of implementing the Policy (including time and workload)	<p>Training needs have been identified:</p> <ul style="list-style-type: none">• Ensure all staff engaged in the REF selection process has completed the University’s Equality and Diversity e-learning training programme.• Ensure all staff engaged in the REF selection process has completed REF specific equality training.• Ensure that the REF Equality Group receive appropriate training to undertake their role in assessing requests for special circumstances. • The need to manage the workloads of those delivering staff equality training to ensure they have time to deliver.• Ensure data is drawn in a timely manner and time is available to monitor it.• Ensure that resources are available to develop FAQ’s• Make time available to continue with a programme of communication.
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RECOMMENDATIONS AND REVIEW DATE

Bangor University's Code of Practice for the selection of staff for the Research Excellence Framework 2012 (REF) will be reviewed for equality impact as follows:

- 1) Second Equality Impact Assessment following the Draft REF Exercise which will include:
 - a) Quantitative analysis of equality data on the profile of staff both in and out of the REF return.
 - b) Quantitative analysis of data from the REF Equality Group looking at requests for special circumstances
 - c) Qualitative data from sources such as line mangers.
 - d) Any appeals, general complaints or issues raised through formal and informal procedures within the University.

- 2) Third Equality Impact Assessment post submission to include a full review of all available data and information accumulated during the process

IMPACT ASSESSMENT SIGNATURE AND DATE

Claire Davis – Research Assessment Manager.....date

Jackie Ellis – Equal opportunities Officerdate

Annex B

REF requirement for a code of practice – taken from HEFCE’s ‘Assessment Framework and Guidance on Submissions ([REF 02/2011](#))

Part 4: Codes of practice on the selection of staff

Introduction

1. The purpose of the guidance in Part 4 is to support institutions in promoting equality and diversity when preparing submissions to the REF, through drawing up and implementing a code of practice on the fair and transparent selection of staff. This will aid institutions in including all their eligible staff in submissions who are conducting excellent research, as well as promoting equality, complying with legislation and avoiding discrimination.
2. Each institution making a submission is required to develop, document and apply a code of practice on selecting staff to include in their REF submissions. On making submissions, the head of institution will be required to confirm adherence to this code. The funding bodies require that institutions’ codes of practice be submitted to the REF team by 31 July 2012. The Equality and Diversity Advisory Panel (EDAP) will examine these in advance of the submission deadline, and all institutions’ codes will be published with the rest of the submissions at the end of the assessment process.
3. We have developed the guidance in Part 4 with advice from the REF Equalities and Diversity Advisory Group (EDAG), and drawing on a review of the 2008 RAE codes of practice. It is intended to assist HEIs in drawing up a code of practice that frames their decision-making processes in relation to the REF 2014 in the context of the principles of equalities and diversity, and all relevant legislation. For those institutions that do not already have an equality code governing their REF preparations, it offers suggestions on procedures they might consider including. Further support on developing and applying a code of practice will be on the ECU web-site www.ecu.ac.uk/our-projects/REF from September 2011.

The legislative context

4. The Equality Act 2010 harmonised and consolidated previous anti-discrimination legislation. The Act covers the protected characteristics of:
 - a. age
 - b. disability
 - c. gender reassignment
 - d. marriage and civil partnership
 - e. pregnancy and maternity
 - f. race
 - g. religion or belief
 - h. sex
 - i. sexual orientation.
5. As well as prohibiting direct discrimination the Act prohibits indirect discrimination – following a policy that, although applied equally to everyone, is harder for those with a protected characteristic to comply with. Indirect discrimination is not a breach of the Act if it is a proportionate means of achieving a legitimate aim. Direct discrimination on the grounds of age will not be unlawful if it is a proportionate means of achieving a legitimate aim.

6. With the exceptions of marriage and civil partnership and pregnancy and maternity, protection from discrimination extends to people who are perceived to have or are associated with someone who has a protected characteristic. For example, if a researcher is treated less favourably because they care for their disabled parent, that could be unlawful disability discrimination.

7. Similarly to previous legislation, it is lawful to treat a disabled person more favourably than a non disabled person, and public bodies including HEIs are required to make reasonable adjustments for disabled people.

8. The Equality Act places requirements on the funding bodies as public sector organisations and on HEIs as public sector organisations and employers. Most of the Act, as it relates to public functions and employment, came into force in October 2010. The Act covers England, Scotland and Wales. Apart from minor provisions, Northern Ireland is not covered by the Act.

9. The public sector equality duty of the Act came into force in April 2011. Under the public sector equality duty, the higher education funding bodies and HEIs in England, Scotland and Wales, in carrying out their functions, must have due regard to the need to:

- Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Act.
- Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it.
- Foster good relations between persons who share a relevant protected characteristic and person who do not share it.

(In this context a 'relevant' protected characteristic is one other than marriage and civil partnership.)

10. The scope of equality legislation in Northern Ireland is similar to the Equality Act. In addition, it is unlawful to discriminate against people on the grounds of political opinion. Section 75 of the Northern Ireland Act 1998 also places a statutory obligation on the Department for Employment and Learning Northern Ireland and HEIs in Northern Ireland in carrying out their public functions to have due regard to the need to promote equality of opportunity:

- between persons of different religious belief, political opinion, racial group, age, marital status or sexual orientation;
- between men and women generally;
- between persons with a disability and persons without; and
- between persons with dependants and persons without.

Funding bodies' legal responsibilities

11. In order to demonstrate compliance with the public sector equality duty and section 75 of the Northern Ireland Act, the higher education funding bodies need to consider and understand the impact of their policies on equality. The funding bodies have considered the equality impact of the RAE in the development of the REF, and equality has been embedded into all relevant elements of the REF. The funding bodies will analyse the selection rates by staff characteristics at sector level to inform their future work.

HEIs' legal responsibilities

12. As both employers and public bodies, HEIs need to ensure that their REF procedures do not discriminate unlawfully against individuals because of age, disability, gender identity, marriage and civil partnership, race, religion or belief, sex or sexual orientation or because they are pregnant or

have recently given birth. In addition, in Northern Ireland, HEIs must ensure that their procedures do not discriminate on the grounds of political opinion.

13. When developing their REF procedures, HEIs will also need to be mindful that under the fixed-term employee and part-time workers regulations, fixed-term employees and part-time workers have the right not to be treated by an employer any less favourably than the employer treats comparable employees on open contracts or full-time workers. The relevant regulations are:

- a. Part-time Workers (Prevention of Less Favourable Treatment) Regulations 2000
- b. Part-time Workers (Prevention of Less Favourable Treatment) Regulations (Northern Ireland) 2000
- c. Fixed-term Employees (Prevention of Less Favourable Treatment) Regulations 2002
- d. Fixed-term Employees (Prevention of Less Favourable Treatment) Regulations (Northern Ireland) 2002.

14. As public sector organisations, in order to show compliance with the requirements of the public sector equality duty of the Equality Act 2010, HEIs in England, Scotland and Wales need to consider and understand the effect of their REF policies on equality. Equalities legislation in Northern Ireland and Wales places a specific duty on HEIs to conduct equality impact assessments on new and existing policies. Consequently, the funding bodies require all HEIs to conduct equality impact assessments on their policies for selecting staff for the REF.

Summary of legislation

15. A summary of the equality legislation with which institutions have to comply generally, and which they should take into account when preparing REF 2014 submissions is included in Table 2. Panel chairs, members and secretaries have received a briefing about this legislation (see ‘Equality briefing for REF panels’ available at www.ref.ac.uk under ‘Publications’). The briefing instructs them to develop working methods and assessment criteria that encourage HEIs to submit the work of all of their excellent researchers, including those whose ability to produce four outputs or work productively throughout the assessment period had been constrained for reasons covered by equality legislation.

Table 2: Summary of equality legislation

Age	<p>All employees within the higher education sector are protected from unlawful age discrimination in employment under the Equality Act 2010 and the Employment Equality (Age) Regulations (Northern Ireland) 2006. Individuals are also protected if they are perceived to be or if they are associated with a person of a particular age group. (These provisions in the Equality Act 2010 are partially in force, but should be fully in place by April 2012.)</p> <p>Age discrimination can occur when people of a particular age group are treated less favourably than people in other age groups. An age group could be for example, people of the same age, the under 30s or people aged 45-50. A person can belong to a number of different age groups.</p> <p>Age discrimination will not be unlawful if it is a proportionate means of achieving a legitimate aim. However, in the context of the REF, the view of the funding bodies is that if a researcher produces excellent research an HEI will not be able to justify not submitting them because of the their age group.</p> <p>It is important to note that early career researchers are likely to come from a range</p>
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	<p>of age groups. The definition of early career researcher used in the REF (see paragraph 85) is not limited to young people.</p> <p>HEIs should also note that given developments in equalities law in the UK and Europe, the default retirement age will be abolished from 1 October 2011 in England, Scotland, Wales and Northern Ireland.</p>
Disability	<p>The Equality Act 2010, the Disability Discrimination Act (1995) (Northern Ireland only) and the Disability Discrimination (Northern Ireland) Order 2006 prevent unlawful discrimination relating to disability. Individuals are also protected if they are perceived to have a disability or if they are associated with a person who is disabled, for example, if they are responsible for caring for a disabled family member.</p> <p>A person is considered to be disabled if they have or have had a physical and/or mental impairment which has ‘a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities’. Long-term impairments include those that last or are likely to last for at least 12 months.</p> <p>Cancer, HIV, multiple sclerosis and progressive/degenerative conditions are disabilities too, even if they do not currently have an adverse effect on the carrying out of day-to-day activities.</p> <p>The definition of disability is different in Northern Ireland in that a list of day-to-day activities is referred to. There is no list of day-to-day activities for England, Scotland and Wales but day-to-day activities are taken to mean activities that people, not individuals, carry out on a daily or frequent basis.</p> <p>While there is no definitive list of what is considered a disability, it covers a wide range of impairments including:</p> <ul style="list-style-type: none"> • sensory impairments • impairments with fluctuating or recurring effects such as rheumatoid arthritis, depression and epilepsy • progressive impairments, such as motor neurone disease, muscular dystrophy, HIV and cancer • organ-specific impairments, including respiratory conditions and cardiovascular diseases • developmental impairments, such as autistic spectrum disorders and dyslexia • mental health conditions such as depression and eating disorders • impairments caused by injury to the body or brain. <p>It is important for HEIs to note that people who have had a past disability are also protected from discrimination, victimisation and harassment because of disability.</p> <p>Equality law requires HEIs to anticipate the needs of disabled people and make reasonable adjustments for them. Failure to make a reasonable adjustment constitutes discrimination. If a disabled researcher’s impairment has affected the quantity of their research outputs, they may be submitted with a reduced number of outputs (see paragraphs 90-100 and the panel criteria).</p>
Gender	The Equality Act 2010 and the Sex Discrimination (Northern Ireland) Order 1976

reassignment	<p>protect from discrimination trans people who have proposed, started or completed a process to change their sex. Staff in HE do not have to be under medical supervision to be afforded protection because of gender reassignment and staff are protected if they are perceived to be undergoing or have undergone gender reassignment. They are also protected if they are associated with someone who has proposed, is undergoing or has undergone gender reassignment.</p> <p>Trans people who undergo gender reassignment will need to take time off for appointments and in some cases, for medical assistance. The transition process is lengthy, often taking several years and it is likely to be a difficult period for the trans person as they seek recognition of their new gender from their family, friends, employer and society as a whole.</p> <p>The Gender Recognition Act 2004 gave enhanced privacy rights to trans people who undergo gender reassignment. A person acting in an official capacity who acquires information about a person’s status as a transsexual may commit a criminal offence if they pass the information to a third party without consent.</p> <p>Consequently, staff within HEIs with responsibility for REF submissions must ensure that the information they receive about gender reassignment is treated with particular care.</p> <p>Staff whose ability to work productively throughout the REF assessment period has been constrained due to gender reassignment may be submitted with a reduced number of research outputs (see paragraphs 90-100, and the panel criteria). Information about the member of staff will be kept confidential as described in paragraph 98.</p>
Marriage and civil partnership	<p>Under the Equality Act 2010 and the Sex Discrimination (Northern Ireland) Order 1976 as amended, individuals are protected from unlawful discrimination on the grounds of marriage and civil partnership status. The protection from discrimination is to ensure that people who are married or in a civil partnership receive the same benefits and treatment in employment. The protection from discrimination does not apply to single people.</p> <p>In relation to the REF HEIs must ensure that their processes for selecting staff do not inadvertently discriminate against staff who are married or in civil partnerships.</p>
Political opinion	<p>The Fair Employment and Treatment (Northern Ireland) Order 1998 protects staff from unlawful discrimination on the grounds of political opinion.</p> <p>HEIs should be aware of not making any judgements about the selection of staff for REF submissions based on their political opinion.</p>
Pregnancy and maternity	<p>Under the Equality Act 2010 and the Sex Discrimination (Northern Ireland) Order 1976 women are protected from unlawful discrimination related to pregnancy and maternity.</p> <p>Consequently researchers who have taken time out of work or whose ability to work</p>

	<p>productively throughout the assessment period because of pregnancy and/or maternity, may be submitted with a reduced number of research outputs, as set out in paragraphs 90-100 and in the panel criteria documents.</p> <p>In addition, HEIs should ensure that female researchers who are pregnant or on maternity leave are kept informed about and included in their submissions process.</p> <p>For the purposes of this summary it is important to note that primary adopters have similar entitlements to women on maternity leave.</p>
Race	<p>The Equality Act 2010 and the Race Relations (Northern Ireland) Order 1997 protect HEI staff from unlawful discrimination connected to race. The definition of race includes colour, ethnic or national origins or nationality. Individuals are also protected if they are perceived to be or are associated with a person of a particular race.</p> <p>HEIs should be aware of not making any judgements about the selection of staff for REF submissions based on their race or assumed race (for example, based on their name).</p>
Religion and belief including non-belief	<p>The Equality Act 2010 and the Fair Employment and Treatment (Northern Ireland) Order 1998 protect HEI staff from unlawful discrimination to do with religion or belief. Individuals are also protected if they are perceived to be or are associated with a person of a particular religion or belief.</p> <p>HEIs should be aware of not making any judgements about the selection of staff for REF submissions based on their actual or perceived religion or belief, including non-belief. ‘Belief’ includes any structured philosophical belief with clear values that has an effect on how its adherents conduct their lives.</p>
Sex (including breastfeeding and additional paternity and adoption leave)	<p>The Equality Act 2010 and the Sex Discrimination (Northern Ireland) Order 1976 protect HEI staff from unlawful discrimination to do with sex. Employees are also protected because of their perceived sex or because of their association with someone of a particular sex.</p> <p>The sex discrimination provisions of the Equality Act explicitly protect women from less favourable treatment because they are breastfeeding. Consequently the impact of breastfeeding on a women’s ability to work productively will be taken into account, as set out in paragraph 90-100 and the panel criteria documents.</p> <p>From 3 April 2011, partners of new mothers and secondary adopters will be entitled to up to 26 weeks of additional paternity and adoption leave. People who take additional paternity or adoption leave will have similar entitlements to women on maternity leave and barriers that exist to taking the leave, or as a result of having taken it, could constitute unlawful sex discrimination. Consequently researchers who have taken additional paternity and adoption leave may be submitted with a reduced number of outputs, as set out in paragraphs 90-100 and in the panel criteria documents.</p> <p>HEIs need to be wary of selecting researchers by any criterion that it would be easier</p>

	for men to comply with than women, or vice versa. There are many cases where a requirement to work full-time (or less favourable treatment of people working part-time or flexibly) has been held to discriminate unlawfully against women.
Sexual orientation	<p>The Equality Act 2010 and the Employment Equality (Sexual Orientation) Regulations (Northern Ireland) 2003 protect HEI staff from unlawful discrimination to do with sexual orientation. Individuals are also protected if they are perceived to be or are associated with someone who is of a particular sexual orientation.</p> <p>HEIs should be aware of not making any judgements about the selection of staff for REF submissions based on their actual or perceived sexual orientation.</p>
Welsh Language	<p>The Welsh Language Act 1993 places a duty on public bodies in Wales to treat Welsh and English on an equal basis. This is reinforced by the provisions of the Welsh Language (Wales) Measure 2011.</p> <p>The arrangements for the assessment of outputs in the medium of Welsh by the REF panels are set out in paragraphs 128-130.</p>

Guidance to institutions

16. It is a requirement of the REF that each submitting institution establishes a code of practice on the selection of staff for REF submissions. The guidance here provides a common framework for institutions' development of policies and procedures within the REF, but does not generate obligations beyond those that HEIs will in any case need to address. It is the responsibility of HEIs to ensure that their codes of practice, and the manner in which they participate in the REF, are lawful.

17. Institutions that conduct mock REF exercises might consider using them as an opportunity to apply their draft code and refine it further. Where external advisors are used in such exercises, institutions should brief them about their developing REF codes of practice and, in particular, provide guidance about the appropriate level of detailed comment by external advisers on individuals. Mock exercises should include equality impact assessments as part of the process, and the implications of these should be considered when preparing the final submission.

Principles

18. Each institution's code of practice should demonstrate fairness to its staff by addressing the following principles:

- a. **Transparency:** All processes for the selection of staff for inclusion in REF submissions should be transparent. Codes of practice should be drawn up and made available in an easily accessible format and publicised to all academic staff across the institution, including on the staff intranet, and drawn to the attention of those absent from work. We would expect there to be a programme of communication activity to disseminate the code of practice and explain the processes related to selection of staff for submission. This should be documented in the code. We encourage institutions to publish their codes of practice on their external web-site, and they will be published by the REF team as part of the submissions.
- b. **Consistency:** It is essential that policy in respect of staff selection is consistent across the institution and that the code of practice is implemented uniformly. The code of

- practice should set out the principles to be applied to all aspects/stages of the process at all levels within the institution where decisions will be made.
- c. **Accountability:** Responsibilities should be clearly defined, and individuals and bodies that are involved in selecting staff for REF submissions should be identified by name or role. Codes should also state what training those who are involved in selecting staff will have had. Operating criteria and terms of reference for individuals, committees, advisory groups and any other bodies concerned with staff selection should be made readily available to all individuals and groups concerned.
 - d. **Inclusivity:** The code should promote an inclusive environment, enabling institutions to identify all eligible staff who have produced excellent research for submission to the REF.

Staff and committees

19. Structural differences between HEIs mean that the method of developing submissions and the positions of individuals responsible for selection will not be uniform across the sector. The procedures for identifying designated staff (even a senior officer such as the pro vice-chancellor of research) and establishing committees responsible for selecting staff should be clearly documented in the code of practice, as should their terms of reference.

20. Staff with such responsibilities must be provided with training on equality and diversity which has been tailored to the REF processes. The code should detail the equality training that designated persons will either undertake or have undertaken since the introduction of the Equality Act 2010, or the level of understanding of the issues they will be required to attain.

21. We recommend that training include case studies that are used to explore issues such as the implications of dealing with personal circumstances in the process of selecting staff for inclusion in the submission. (Training material will be available on the ECU web-site www.ecu.ac.uk/our-projects/REF.)

22. Clear definitions of each person's role within the selection process must be provided, including the rationale for their role and where the role fits into the institutional management framework.

23. Where a committee or committees have designated REF responsibilities – whether it is at departmental, faculty, UOA or central level – these should be detailed in the code of practice, including, for each committee:

- how the committee has been formed
- its membership
- the definition of its position within the advisory or decision-making process
- the steps taken to ensure that members are well informed about their own and the institution's legal obligations regarding equality.

24. The following details should be provided about its mode of operation:

- the criteria that it will use in carrying out its functions
- the method by which these criteria are communicated
- the timescale for selecting staff
- the method and timescale in which feedback will be provided in respect of the decisions made
- the appeals mechanism.

25. Where committees consider reports from other committees or designated staff reporting to them, the basis of the discussion must be clear, and records must be kept. When individual performance is discussed and the individual is absent, committees should be made aware of all the facts relating to the individual.

Equality impact assessment

26. The funding bodies require all HEIs to conduct an equality impact assessment (EIA) on their policy and procedures for selecting staff for the REF. While the funding bodies recognise that there is no longer a prescribed process for conducting an EIA, it should be a thorough and systematic analysis to determine whether the institution's staff selection policy for the REF may have a differential impact on particular groups. It should inform the institution's code of practice and be kept under review as submissions are prepared.

27. EIAs should be informed by an analysis of data on staff who are eligible for selection in respect of all the protected characteristics for which data are available. The analysis should cover all eligible staff. The funding bodies recognise that it is best practice to use information gained from engaging, consulting or involving staff from protected groups to inform an EIA. (Consultation is a requirement of section 75 of the Northern Ireland Act 1998 and engagement is a requirement of the Welsh specific duties of the Equality Act 2010. Engagement is also key to showing due regard to the requirements of the public sector equality duty in England and Scotland.)

28. HEIs who conduct mock exercises can use the process to inform their EIA, and HEIs can also consider information on equality from previous RAEs in identifying possible barriers to participation and opportunities to advance equality.

29. The EIA should be reviewed at key stages of the selection process, to ensure that any necessary changes to prevent discrimination or promote equality are taken prior to the submission deadline. Examples of appropriate points to review the EIA are:

- when identifying eligible staff who are likely to be selected
- when considering appeals
- when preparing the final submission.

30. EIAs should enable HEIs to identify where discrimination may inadvertently occur within their REF processes. They will also enable HEIs to identify where a particular policy or practice has a positive impact on the advancement of equality. Where potential discrimination is identified HEIs will need to justify the policy or practice within the constraints of the law or they will need to take actions to change the policy or practice. If a particular policy or practice is found to have a positive impact on equality, HEIs can seek to apply it to other areas of their REF work.

31. HEIs may consider undertaking impact assessments at the level of UOAs as well as at the institutional level, for example if they perceive imbalance in particular UOAs.

32. The funding bodies expect HEIs to publish their equality impact assessments after the submissions have been made, as a matter of good practice. The published information should include the outcomes of any actions taken to prevent discrimination or advance equality. Publication is a legal requirement in Northern Ireland and in Wales where a policy or practice is regarded as having a significant impact.

Disclosure of individual staff circumstances

33. Guidance has been produced on how REF panels will deal with individual circumstances that constrained an individual's ability to produce four outputs or work productively throughout the assessment period. The institution's code of practice on the selection of staff must draw attention to this guidance and be clear on how such circumstances should be declared by staff.

34. Institutions should have robust procedures to enable staff to disclose their circumstances with an appropriate degree of confidentiality. Particular regard should be had to the disclosure of sensitive issues such as ongoing illness or mental health conditions. We recommend that this is conducted proactively: instead of relying on individuals coming forward, **all** staff potentially eligible for selection should be asked to complete a form about their individual circumstances. To enable individuals to disclose circumstances in confidence, institutions should consider managing this process centrally.

35. Examples of complex individual staff circumstances (see sub-paragraph 92b for an explanation of complex) will be available on the ECU web-site www.ecu.ac.uk/our-projects/REF, indicating the appropriate reduction in outputs for particular circumstances. We recommend that institutions use or adapt the template used for these examples, when preparing submissions.

36. At each selection stage, institutions are encouraged to formally monitor the process for identifying individuals whose circumstances might need special consideration, and to evidence decisions and actions.

37. The institutional code of practice must include a list of circumstances that will be taken into account, and the mechanisms by which panels and the institution will take them into account. The institution's approach must be consistent with the range of circumstances and procedures set out in both the guidance on submissions and panel criteria statements, and must be standard across all departments.

Fixed term and part-time staff

38. In the light of the Fixed-term and Part-time Regulations (see paragraph 199), consideration will also need to be given to how the institution can demonstrate the implementation of equality for those on fixed-term (relative to open) and part-time (relative to full-time) contracts.

39. The code of practice should therefore include a statement about how the institution supports its fixed-term and part-time staff, including contract research staff, in relation to equality and diversity.

Joint submissions

40. Institutions making joint submissions may wish to make their code of practice available to collaborating institutions. In any case, they should ensure that joint decision-making across institutions does not compromise their adherence to their respective codes of practice.

Feedback and appeals

41. Appropriate and timely procedures should be put in place to inform staff who are not selected of the reasons behind the decision, and for appeals. Appeals procedures should allow members of staff to appeal after they have received this feedback, and for that appeal to be considered by the HEI before the final selection is made. The individuals that handle appeals should be independent of the decisions about selecting staff and should receive appropriate training.

42. The code of practice should include details of the appeals procedures. Institutions should consider carefully before deciding to use existing complaint reporting mechanisms, and should only do so if these are appropriate for the purpose and can be concluded prior to the REF submission deadline.

Submitting codes of practice

43. Codes of practice should be submitted to the REF team on or before 31 July 2012. The EDAP will examine the codes and advise the UK funding bodies on their adherence to this guidance, prior to the final submission deadline. If the EDAP advises them that an institution's code of practice does not adhere to this guidance the funding bodies will take appropriate action.

44. All submitted codes of practice will be published as part of institutions' submissions, after the conclusion of the REF.

45. The funding bodies plan to undertake an evaluation of the codes of practice after the REF has concluded. As with the RAE, we anticipate this will identify areas of good practice.

Useful resources

46. Further information, including the text of legislation and examples of good practice can be accessed through ECU's web-site at www.ecu.ac.uk/our-projects/REF.

Annex C

Staff and individual staff circumstances, taken from REF 01.2012 Panel criteria and working methods, pages 10 – 13.

Clearly defined circumstances

70. Where an individual has one or more circumstances with a clearly defined reduction in outputs, the number of outputs that may be reduced should be determined according to the tables and guidance in paragraphs 72-86 below. All sub-panels will accept a reduction in outputs according to this guidance and will assess the remaining number of submitted outputs without any penalty.

71. In REF1b, submissions must include sufficient details of the individual's circumstances to show that these criteria have been applied correctly. The panel secretariat will examine the information in the first instance and advise the sub-panels on whether sufficient information has been provided and the guidance applied correctly. The panel secretariat will be trained to provide such advice, on a consistent basis across all UOAs. Where the sub-panel judges that the criteria have not been met, the 'missing' output(s) will be recorded as unclassified. (For example, an individual became an early career researcher in January 2011 but only one output is submitted rather than two. In this case the submitted output will be assessed, and the 'missing' output recorded as unclassified.)

Early career researchers

72. Early career researchers are defined in paragraphs 85-86 of 'guidance on submissions'. Table 1 sets out the permitted reduction in outputs without penalty in the assessment for early career researchers who meet this definition.

Table 1 Early career researchers: permitted reduction in outputs

Date at which the individual first met the REF definition of an early career researcher:	Number of outputs may be reduced by up to:
On or before 31 July 2009	0
Between 1 August 2009 and 31 July 2010 inclusive	1
Between 1 August 2010 and 31 July 2011 inclusive	2
On or after 1 August 2011	3

Absence from work due to part-time working, secondments or career breaks

73. Table 2 sets out the permitted reduction in outputs without penalty in the assessment for absence from work due to:

- a. part-time working
- b. secondments or career breaks outside of the higher education sector, and in which the individual did not undertake academic research.

Table 2 Part-time working, secondments or career breaks: permitted reduction in outputs

Total months absent between 1 January 2008 and 31 October 2013 due to working part-time, secondment or career break:	Number of outputs may be reduced by up to:
0-11.99	0
12-27.99	1
28-45.99	2
46 or more	3

74. The allowances in Table 2 are based on the length of the individual's absence or time away from working in higher education. They are defined in terms of total months absent from work. For part-time working, the equivalent 'total months absent' should be calculated by multiplying the number of months worked part-time by the full-time equivalent (FTE) **not** worked during those months. For example, an individual worked part-time for 30 months at 0.6 FTE. The number of equivalent months absent = $30 \times 0.4 = 12$.

Qualifying periods of maternity, paternity or adoption leave

75. Individuals may reduce the number of outputs by one, for each discrete period of:

- a. Statutory maternity leave or statutory adoption leave taken substantially during the period 1 January 2008 to 31 October 2013, regardless of the length of the leave.
- b. Additional paternity or adoption leave² lasting for four months or more, taken substantially during the period 1 January 2008 to 31 October 2013.

76. The approach to these circumstances is based on the funding bodies' considered judgement that the impact of such a period of leave and the arrival of a new child into a family is generally sufficiently disruptive of an individual's research work to justify the reduction of an output. This judgement was informed by the consultation on draft panel criteria, in which an overwhelming majority of respondents supported such an approach.

77. The funding bodies' decision not to have a minimum qualifying period for maternity leave was informed by the sector's clear support for this approach in the consultation; recognition of the potential physical implications of pregnancy and childbirth; and the intention to remove any artificial barriers to the inclusion of women in submissions, given that women were significantly less likely to be selected in former RAE exercises.

78. The funding bodies consider it appropriate to make the same provision for those regarded as the 'primary adopter' of a child (that is, a person who takes statutory adoption leave), as the adoption of a child and taking of statutory adoption leave is generally likely to have a comparable impact on a researcher's work to that of taking maternity leave.

79. As regards additional paternity or adoption leave, researchers who take such leave will also have been away from work and acting as the primary carer of a new child within a family. The funding bodies consider that where researchers take such leave over a significant period (four months or more), this is likely to have an impact on their ability to work productively on research that is comparable to the impact on those taking maternity or statutory adoption leave.

80. While the clearly defined reduction of outputs due to additional paternity or adoption leave is subject to a minimum period of four months, shorter periods of such leave can be taken into account as follows:

- a. By seeking a reduction in outputs under the provision for complex circumstances, for example where the period of leave had an impact in combination with other factors such as ongoing childcare responsibilities.

² 'Additional paternity or adoption leave' refers to leave of up to 26 weeks which is taken to care for a child where the person's spouse, partner or civil partner was entitled to statutory maternity leave or statutory adoption leave, and has since returned to work. The term 'additional paternity leave' is often used to describe this type of leave although it may be taken by parents of either gender. For the purposes of the REF we refer to this leave as 'additional paternity or adoption leave'.

- b. By combining the number of months for shorter periods of such leave in combination with other clearly defined circumstances, according to Table 2.

81. Any period of maternity, adoption or paternity leave that qualifies for the reduction of an output under the provisions in paragraph 75 above may in individual cases be associated with prolonged constraints on work that justify the reduction of more than one output. In such cases, the circumstances should be explained using the arrangements for complex circumstances.

Combining clearly defined circumstances

82. Where individuals have had a combination of circumstances with clearly defined reductions in outputs, these may be accumulated up to a maximum reduction of three outputs. For each circumstance, the relevant reduction should be applied and added together to calculate the total maximum reduction.

83. Where Table 1 is combined with Table 2, the period of time since 1 January 2008 up until the individual met the definition of an early career researcher should be calculated in months, and Table 2 should be applied.

84. When combining circumstances, only one circumstance should be taken into account for any period of time during which they took place simultaneously. (For example, an individual worked part-time throughout the assessment period and first met the definition of an early career researcher on 1 September 2009. In this case the number of months 'absent' due to part-time working should be calculated from 1 September 2009 onwards, and combined with the reduction due to qualifying as an early career researcher, as indicated in paragraph 83 above.)

85. Where an individual has a combination of circumstances with a clearly defined reduction in outputs **and** complex circumstances, the institution should submit these collectively as 'complex' so that a single judgement can be made about the appropriate reduction in outputs, taking into account all the circumstances. Those circumstances with a clearly defined reduction in outputs should be calculated according to the guidance above (paragraphs 72-84).

Other circumstances that apply in UOAs 1-6

86. In UOAs 1-6, the number of outputs may be reduced by up to two, without penalty in the assessment, for the following:

- a. Category A staff who are junior clinical academics. These are defined as clinically qualified academics who are still completing their clinical training in medicine or dentistry and have not gained a Certificate of Completion of Training (CCT) or its equivalent prior to 31 October 2013.
- b. Category C staff who are employed primarily as clinical, health or veterinary professionals (for example by the NHS), and whose research is primarily focused in the submitting unit.

87. These allowances are made on the basis that the staff concerned are normally significantly constrained in the time they have available to undertake research during the assessment period. The reduction of two outputs takes account of significant constraints on research work, and is normally sufficient to also take account of additional circumstances that may have affected the individual's research work. Where the individual meets the criteria at paragraph 86, and has had significant additional circumstances – for any of the reasons at paragraph 69 – the institution may return the circumstances as 'complex' with a reduction of three outputs, and provide a justification for this.

Complex circumstances

88. Where staff have had one or more complex circumstances – including in combination with any circumstances with a clearly defined reduction in outputs – the institution will need to make a judgement on the appropriate reduction in the number of outputs submitted, and provide a rationale for this judgement.

89. As far as is practicable, the information in REF1b should provide an estimate – in terms of the equivalent number of months absent from work – of the impact of the complex circumstances on the individual's ability to work productively throughout the assessment period, and state any further constraints on the individual's research work in addition to the equivalent months absent. A reduction should be made according to Table 2 in relation to estimated months absent from work, with further constraints taken into account as appropriate. To aid institutions the Equality Challenge Unit (ECU) will publish worked examples of complex circumstances, which will indicate how these calculations can be made and the appropriate reduction in outputs for a range of complex circumstances. These will be available at www.ecu.ac.uk/our-projects/REF from February 2012.

90. All submitted complex circumstances will be considered by the REF Equality and Diversity Advisory Panel (EDAP), on a consistent basis across all UOAs. The membership and terms of reference of the EDAP are available at www.ref.ac.uk under Equality and diversity. The EDAP will make recommendations about the appropriate number of outputs that may be reduced without penalty to the relevant main panel chairs, who will make the decisions. The relevant sub-panels will then be informed of the decisions and will assess the remaining outputs without any penalty.

91. To enable individuals to disclose the information in a confidential manner, information submitted about individuals' complex circumstances will be kept confidential to the REF team, the EDAP and main panel chairs, and will be destroyed on completion of the REF (as described in 'guidance on submissions', paragraphs 98-99).