

Edinburgh Napier University

*Equality Impact Assessment  
REF2021 Code of Practice*

## Edinburgh Napier University – Equality Impact Assessment

<p><i>School/Service Area</i></p> <p><b>Research and Innovation Office</b></p>	<p><i>Date of Assessment</i></p> <p><b>May 2019</b></p>	<p><i>Name of the proposal to be assessed</i></p> <p><b>REF2021 Code of Practice: Stage 2 Analysis – Final CoP/ Issue of formal letters</b></p>	<p><i>Person/s responsible for the assessment</i></p> <p><b>Research and Innovation Office and; HR Inclusion Team</b></p>
<p><i>Who was present at the EIA?</i></p> <p><b>Dean of R&amp;I Research Policy Officer Inclusivity partner (HR)</b></p>	<p><i>Is this a <b>new</b> or <b>existing</b> proposal?</i> New proposal</p> <p><b>New: REF2021 Code of Practice</b></p>		<p><i>When will this proposal be reviewed?</i></p> <p><b>Stage 1 – Post Mini-REF (Feb 2019)</b>  <b>Stage 2 – Final CoP Submission (May 2019)</b>  <b>Stage 3 – Monitoring (June 2020)</b>  <b>Stage 4 – Post submission (December 2020)</b></p>

1. Briefly describe the aims, objectives and purpose of the Code of Practice.

The Joint UK funding councils require that each institution making a submission to REF2021 is required to develop, document and apply a **Code of Practice (CoP)** on the fair and transparent:

- i. identification of staff with significant responsibility for research, as agreed with staff (where a University is not submitting 100% of Category A eligible staff)
- ii. determining research independence
- iii. selecting Outputs for submission

The University is required to **ensure that REF procedures do not discriminate** unlawfully against, or otherwise have the effect of harassing or victimising individuals from protected characteristics (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).

The Code of Practice has been developed based on the REF 2021 Guidance on Submissions and the guidance given by the Joint UK Funding Councils on the Code of Practice. **The content has been driven by the principles of: Objectivity; Non-discrimination and Transparency.**

**Aims:**

The ultimate goal is to **ensure fairness in the University's REF2021 submission, adhering to the parameters of the REF guidance relating to staff and outputs.**

*achieved by:*

- Utilising Workload Allocation consistently across all Category A eligible staff in all UoAs to identify staff with Significant Responsibility for Research (0.2 FTE, per FTE per year (pro rata for P/T staff)
- Utilising the University's 'MyContribution' Personal Development Review process to agree and record research objectives
- Utilising the agreed three criteria for research independence, applied consistently, relative to the UoA/ discipline
- Utilising the University's Research Information Management System (Worktribe) automated algorithm for the selection of Outputs based on highest quality
- Ensuring that all those involved in decision-making, have received bespoke REF2021 E&D training.

<p>2. <i>Who is intended to benefit / who is affected from the Code of Practice and in what way?</i></p>	<p>The Code is <b>intended for all staff meeting the definition of Category A eligible</b> (<a href="#">p/g 117</a> Guidance on Submissions).</p> <p>The Code outlines the criteria which will be applied consistently to the Cat A eligible staff pool, to identify the Cat A submittable staff pool.</p> <p>The Code is <b>intended to benefit the Cat A eligible staff pool, by providing clear criteria</b>, applied consistently, <b>by which to identify those staff with Significant Responsibility for Research or Research Independence</b> and thus included in the submittable pool for REF2021.</p> <p>The Code also outlines the criteria and processes for <b>selection of Outputs</b> (based on the REF guidance relating to minimum and maximum requirements), <b>based on highest quality/ merit only</b> and it <b>provides a commitment to staff</b> that attributing more or less papers to an individual for the REF2021 submission, will not be seen as a reflection of the value placed on that individual's contribution to the research environment at Edinburgh Napier University.</p> <p>The Code of Practice also <b>benefits the University as a whole by having transparent criteria and processes in place, by which to ensure adherence to the REF guidance and rules on submission.</b></p>
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<p>3. <i>What outcomes are wanted from the Code of Practice?</i></p>	<p>The desired outcome from the Code of Practice is:</p> <p><b>to achieve submission of all staff with Significant Responsibility for Research and research independence and ensure that our REF procedures do not discriminate, harass or victimise individuals from a protected characteristic.</b></p> <p>Another desired outcome is <b>to achieve an optimal REF2021 submission</b> for the University, working within the parameters of the Framework.</p> <p>Desirable Outcomes:</p> <ul style="list-style-type: none"> <li>• Ensure that the University’s criteria and procedures, as outlined in the Code of Practice for the i. identification of staff with SRR, ii. Identification of independent researcher and iii. Selection of Outputs, <b>does not discriminate against any of the protected characteristics</b></li> <li>• Ensure that <b>the University’s criteria is applied fairly, equitably, transparently and consistently</b> across all REF Units of Assessment</li> <li>• Ensure that there is a <b>clear and appropriate process for declaring mitigation</b> (in line with the REF2021 guidance)</li> <li>• Ensuring there is a transparent, <b>independent appeals process</b> in place</li> <li>• Ensuring that those with role holders with responsibility for the application of REF2021 criteria are trained under a <b>bespoke programme of REF2021 Equality and Diversity training</b></li> </ul>
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4. How have you consulted on the Code of Practice including those from protected groups? What were their views?

Development of the Code of Practice has included a thorough **programme of institution-wide consultation** at various stages of development, including:

Open campus meetings on all three campuses, engagement with staff representative groups – Academic Union Representatives, consultation with the University Leadership Team, the University’s Research and Innovation Committee, Academic Board and the REF2021 Steering Group. Staff have also been invited to provide feedback through a dedicated REF2021 CoP email address.

**All reasonable attempts** have been made to publicise the Code of Practice to staff on leave or **working away from the University through means of communication familiar to them.**

Communications to **all staff via the ‘all staff’ email directory** and on the **staff intranet**, has ensured that staff from **across all of the protected groups** have been included in the communications and have had equal opportunity to feed into the consultation process. Similarly, the University Committees as referenced above are **constituted with due regard to a representative balance of diversity**, meaning **staff from across the protected groups** have been present at these Committees and involved in the development.

**Feedback on the development of the Code has been positive**, with staff signalling that they are in agreement with the criteria, working within the parameters outlined by the REF guidance and in light of the data sources available within the University.

In developing this Code of Practice, the institution has considered the content of the Edinburgh Napier REF2014 CoP, alongside the outcomes of the final Equality Impact Assessment, conducted post submission, which found the practices of selection in REF2014 to be fair and transparent.

Further, the University has **considered the report by the Equality and Diversity Advisory Panel (EDAP)** relating to good practice in REF2014, to inform the content of this the Code.

It is designed to **complement the University’s existing recruitment and staff development policies**, all of which have been subject to equality impact assessment and **which comply with the Equality Act 2010.**

5. What factors/forces could contribute/detract from the outcomes?

Factors which could **contribute / detract from the outcomes include:**

- An inclusive communication strategy, ensuring that all staff are aware of the content of the Code of Practice; how it is being implemented; and how it affects them
- A comprehensive E&D training programme for all role holders involved in the application of the Code, to ensure it is implemented consistently and with due regard for staff with protected characteristics
- Robust and consistent processes for allocating and recording Workload Allocation
- Robust and consistent processes for Objective setting at the Personal Development Review 'MyContribution'
- A clear (voluntary) process for the declaration of circumstances which may have affected research productivity in the period (for removal of the minimum one Output)
- A clear appeals process, which is independent to the decision-making process
- Effective School Equality Monitoring Groups in operation to analyse Workload allocation
- A robust scoring process to assess Output quality against the REF criteria
- An effective automated algorithm within Worktribe, which selects Outputs only on the basis of quality
- A commitment to staff that the volume of Outputs attributed for REF2021 is no reflection of the value that individual contributes to the research environment

6. Does this proposal have a positive impact on equality?  
What evidence is there to support this? Could it do more?

The Code has **been developed with consideration of factors which might affect staff from across the protected characteristic groups**. Recognition has been given to **staff working part time, with a fractional research allowance applied for these staff members**. Line managers are trained in **unconscious bias** and the University is committed to **implementing reasonable adjustments**, where appropriate.

**Data analysis** will be conducted at relevant stages in the preparation of the REF2021 submission, utilising data at key stages, **to evaluate if there is any evidence of any group/s of individuals being unfairly treated**.

The analysis **includes a list of identified actions** to be taken forward by the REF Steering Group or the University more broadly, in respect of other University policies which might warrant review based on the findings.

**Stage 1** – Initial screening on the criteria outlined in the REF2021 Code of Practice using data put forward to mini-REF2018 (conducted in September 2018) – Staff data

**Stage 2** – Screening on the criteria within the Code of Practice, following any final amendments to the code and based on issue of formal letters identifying staff as SRR or independent (to be conducted in May 2019) – Staff data

**Stage 3** – Monitoring prior to submission (June 2020) – Staff data and Output selection

**Stage 4** - Final EIA conducted post-submission (December 2020) – Staff and Outputs selection

**The relevant data analysis is provided below (where data allows):**

**Whilst the data is available by UoA, the data sets are too small to draw any meaningful conclusions. As such the EIA analysis is based on data relating to the University submission.**



Total Eligible Pool (Cat A staff) by Protected Characteristic (552 People)



Proportion of Cat A Staff deemed to be Submittable (SRR or Independent researcher) by Protected Characteristic (298 People)

7. Is it likely that the proposal **could** have a positive or negative impact due to gender (including pregnancy and maternity)? What evidence (either presumed or otherwise) do you have for this?

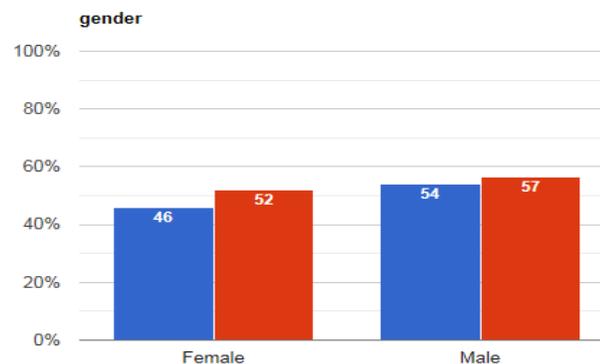
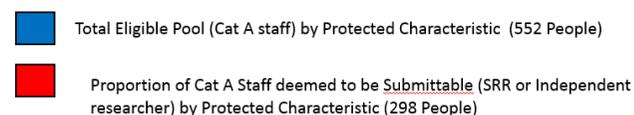
The Code should have no impact (positive or negative) due to gender, as the criteria is being applied consistently to all individuals.

All managers with responsibility for allocating research time take part in **unconscious bias training and bespoke REF E&D training** to avoid direct or indirect discrimination on the basis of any protected characteristics.

Whilst a higher proportion of female staff might be on fractional contracts, working part-time, **the CoP takes accounts for this by applying a fractional expectation** of research time allocation to identify SRR.

**NO**

### Stage 2 Screening: Gender Data as at 03 May 2019



On application of the University’s criteria for identification of SRR and Independent Researcher, the proportion of submittable staff Male to Female is 57%: 43%. This compares with a total Category A eligible pool of 54% to 46%.

This suggest that the profile of submittable staff is broadly reflective of the eligible pool, and that there is **no evidence of negative impact due to gender, when applying the criteria.**

57% of eligible Male staff are submittable according to the criteria, compared with 52% of the Female eligible pool. **The variances in proportions are minor and suggests that there is no gender bias in the application of the criteria.**

**ACTION: Present EIA findings to the University Gender Equality Steering Group.**

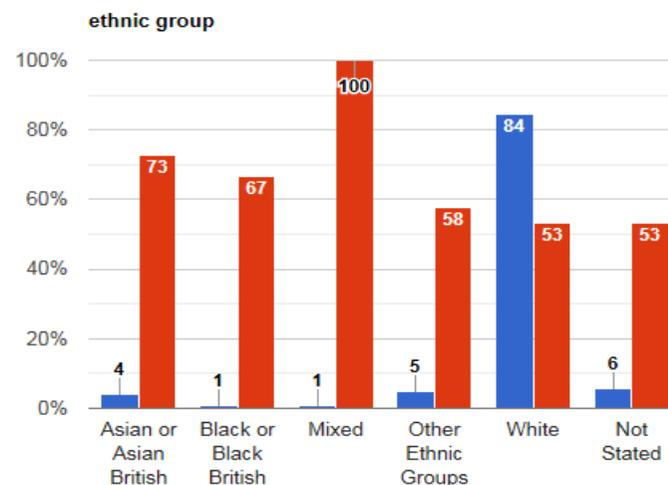
8. Is it likely that the proposal **could** have a positive or negative impact on minority ethnic groups? What evidence (either presumed or otherwise) do you have for this?

The Code should have **no impact (positive or negative) on ethnic groups** as the criteria for identifying SRR or independent researcher are being consistently applied.

All managers with responsibility for allocating research time take part in **unconscious bias training and bespoke REF E&D training** to avoid direct or indirect discrimination on the basis of protected characteristics.

**NO**

### Stage 2 Screening: Ethnic Data as at 03 May 2019



There is **no evidence of discrimination** in the application of criteria relating to ethnicity.

**ACTION: Continue to monitor workload allocation by protected group through the School Inclusivity Monitoring Groups.**

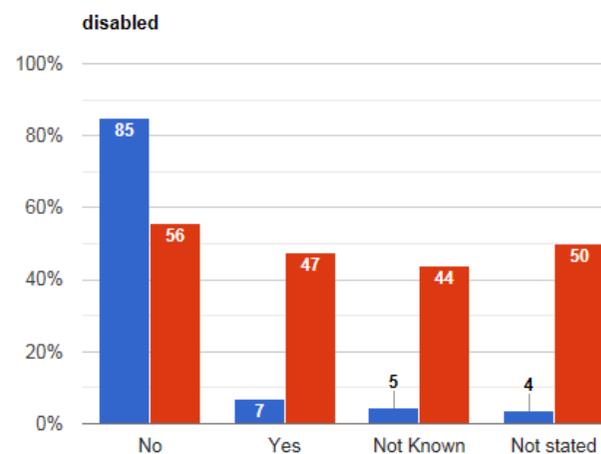
9. Is it likely that the proposal **could** have a positive or negative impact due to disability? What evidence (either presumed or otherwise) do you have for this?

The Code of Practice is unlikely to have an impact on individuals with a disability. The University promotes the implementation of **reasonable adjustments** to facilitate engagement with all four strands of academic activity (Research; Learning & Teaching; Enterprise and Professional Practice).

The University's 'allocating research time policy', recommends that research time should be **allocated in meaningful blocks** to allow for effective research activity to occur. This is considered as part of the discussions relating to annual objectives at the 'MyContribution' meetings, where appropriate and where the individual has disclosed their disability. This includes application of the flexible working policy if appropriate.

**NO**

**Stage 2 Screening: Disability Data as at 03 May 2019**



There is **no evidence of discrimination** in the application of criteria relating to disability.

**ACTION: Present findings to Inclusion Team to promote disclosure of disability through HR Connect self-service, and highlight support services.**

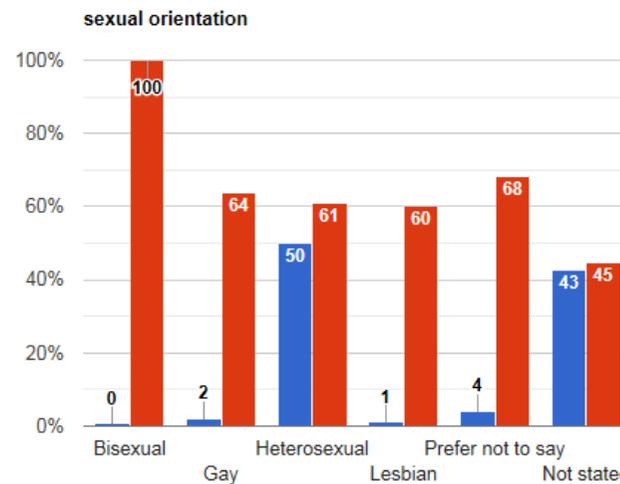
10. Is it likely that the proposal **could** have a positive or negative impact on people due to sexual orientation? What evidence (either presumed or otherwise) do you have for this?

The Code should have **no impact (positive or negative) on sexual orientation** as the criteria for identifying SRR / independent staff are being applied consistently.

All managers with responsibility for allocating research time, take part in **unconscious bias training and bespoke REF E&D training** to avoid direct or indirect discrimination on the basis of protected characteristics.

**NO**

**Stage 2 Screening: Sexual Orientation as at 03 May 2019**



There is **no evidence of discrimination** in the application of criteria relating to sexual orientation.

**ACTION: Present EIA findings to the University's LGBT+ network group**

11. Is it likely that the proposal **could** have a positive or negative impact on people due to their age? What evidence (either presumed or otherwise) do you have for this?

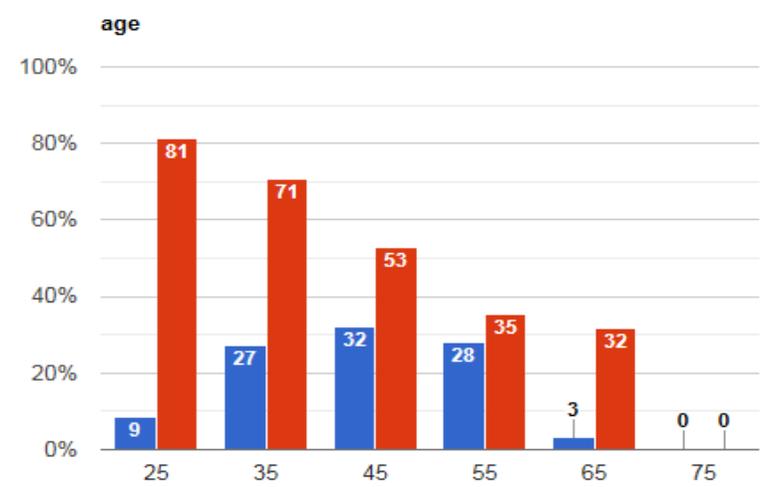
The Code of Practice is unlikely to have an impact on individuals due to their age.

Whilst age could reflect a shorter period in post as an independent researcher (though not always as the definition of ECR applies to career stage not age), the Code mitigates the impact of this in the following ways:

- 1) Early career researchers (of any age) **can apply for a mitigation against the minimum of one Output, allowing them to be submitted without penalty**
- 2) The University has stated that **the volume of outputs** attributed to an individual for the purpose of REF submission is **not a reflection of the value placed** on that individuals contribution to the research environment.

**NO**

**Stage 2 Screening: Age band Data as at 03 May 2019**



The data shows that staff under 35 are more likely to be submittable according to the University’s REF Code of Practice criteria. This is reflective of the University’s revised appointment and promotion framework which was launched in 2015, with a strategic focus on recruitment of new staff with a research profile.

**ACTION:**

- 1) **Present findings to School Inclusion Monitoring Groups**
- 2) **School Inclusion Monitoring Groups to monitor allocation of research time and research objectives to ensure equal opportunity**

12. Is it likely that the proposal **could** have a positive or negative impact on people due to their religious belief (or none)? What evidence (either presumed or otherwise) do you have for this?

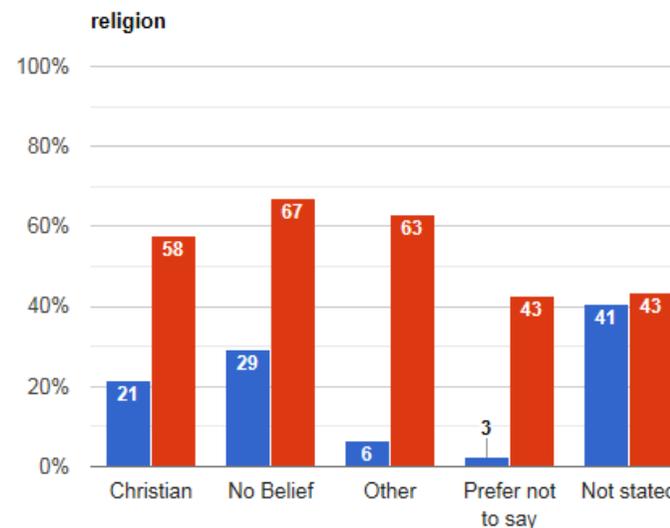
The Code should have **no impact (positive or negative) due to religious belief** as the criteria is consistent and is being consistently applied.

The University is committed to implementing **reasonable adjustments to accommodate circumstances relating to religion** and these are considered as part of the discussions relating to annual objectives at the 'MyContribution' meetings, where appropriate.

All managers with responsibility for allocating research time take part in **unconscious bias training and bespoke REF E&D training** to avoid direct or indirect discrimination on the basis of protected characteristics.

**NO**

### Stage 2 Screening: Religious Data as at 03 May 2019



There is **no evidence of discrimination** in the application of criteria relating to religious belief.

**ACTION: Present findings to University Inclusion Team**

13. Is it likely that the proposal **could** have a positive or negative impact on people with dependants/caring responsibilities? What evidence (either presumed or otherwise) do you have for this?

The Code of Practice is unlikely to have an impact on individuals with caring responsibilities. The University promotes the implementation of **reasonable adjustments** to facilitate engagement with all four strands of academic activity (Research; Learning & Teaching; Enterprise and Professional Practice).

The University's 'allocating research time policy', recommends that **research time should be allocated in meaningful blocks** to allow for effective research activity to occur. This is considered as part of the discussions relating to annual objectives at the 'MyContribution' meetings, where appropriate and where the individual has disclosed their caring responsibilities. This includes application of the **flexible working policy** if appropriate.

Furthermore, for individuals working part-time (because of caring responsibilities or otherwise), the CoP takes account of this by applying a **fractional expectation of research time allocation**.

**NO**

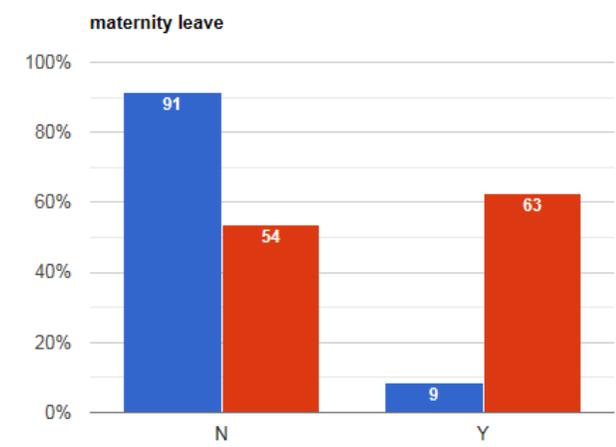
**Stage 2 Screening: Caring Data as at 03 May 2019**

Insufficient data available for meaningful analysis.

**POINT: Low disclosure rate**

**ACTION: Work with the University's Carers Network to promote disclosure and signpost support networks (recognising that caring in the workplace remains a hidden issue)**

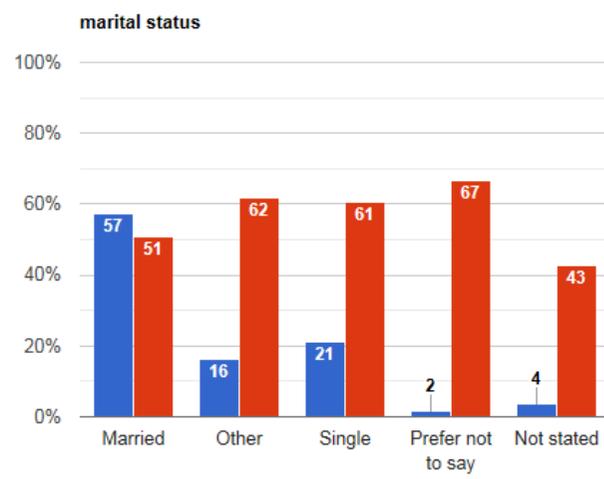
**Stage 2 Screening: Maternity Data as at 03 May 2019**



There is **no evidence of discrimination** in the application of criteria relating to maternity leave.

**ACTION: Present findings to University's Inclusion Team.**

<p>14. Is it likely that the proposal <b>could</b> have a positive or negative impact on people due to them being transgender or transsexual? What evidence (either presumed or otherwise) do you have for this?</p> <p>The Code should have <b>no impact (positive or negative) on transgender / transsexual</b> groups as the criteria for identifying SRR / independent staff are being applied consistently.</p> <p>All managers with responsibility for allocating research time take part in <b>unconscious bias training and bespoke REF E&amp;D training</b> to avoid direct or indirect discrimination on the basis of protected characteristics.</p> <p>The University promotes the implementation of <b>reasonable adjustments</b> to facilitate engagement with all four strands of academic activity (Research; Learning &amp; Teaching; Enterprise and Professional Practice).</p>	<p><b>NO</b></p>	<p><b>Stage 2 Screening: Transgender/Transsexual Data as at 03 May 2019</b></p> <p>Insufficient data available for meaningful analysis.</p> <p><b>ACTION: Continue to promote inclusivity across the University and work with colleagues in the inclusion team to raise awareness.</b></p>
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<p>15. Is it likely that the proposal <b>could</b> have a positive or negative impact on people due to their marital or civil partnership status? What evidence (either presumed or otherwise) do you have for this?</p> <p>The Code should have <b>no impact (positive or negative) on Marital status</b> as the criteria for identifying SRR / independent staff are being applied consistently.</p> <p>All managers with responsibility for allocating research time take part in <b>unconscious bias training and bespoke REF E&amp;D training</b> to avoid direct or indirect discrimination on the basis of protected characteristics.</p>	<p><b>NO</b></p>	<p><b>Stage 2 Screening: Marital Data as at 03 May 2019</b></p>  <table border="1"> <caption>Marital Status Data</caption> <thead> <tr> <th>Marital Status</th> <th>Blue Bar (%)</th> <th>Red Bar (%)</th> </tr> </thead> <tbody> <tr> <td>Married</td> <td>57</td> <td>51</td> </tr> <tr> <td>Other</td> <td>16</td> <td>62</td> </tr> <tr> <td>Single</td> <td>21</td> <td>61</td> </tr> <tr> <td>Prefer not to say</td> <td>2</td> <td>67</td> </tr> <tr> <td>Not stated</td> <td>4</td> <td>43</td> </tr> </tbody> </table> <p>There is <b>no evidence of discrimination</b> in the application of the Code of Practice criteria in relation to marital status.</p> <p><b>ACTION: Present findings to University Inclusion Team.</b></p>	Marital Status	Blue Bar (%)	Red Bar (%)	Married	57	51	Other	16	62	Single	21	61	Prefer not to say	2	67	Not stated	4	43
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Not stated	4	43																		
<p>16. How will you monitor the actual impact that your proposal has had following its implementation? When will you do this?</p>		<p><b>A final EIA will be conducted post-submission</b>(December 2020) to assess the final composition of staff submitted by protected characteristic and the Outputs selected.</p> <p>School Inclusion Monitoring Groups are in operation to analyse workload allocation in the School from an E&amp;D perspective and will highlight any concerns to the REF Steering Group.</p>																		

<p>17. <b>Summary.</b> Summarise the outcome of this Equality Assessment, and state any actions you will be taking as a result.</p>			<p>The stage 2 analysis suggest <b>there is no evidence of discrimination</b> in the criteria or the application of the criteria, on the basis of one or more of the Protected Characteristics. Further, <b>there are processes and policies in place to avoid discrimination and promote reasonable adjustments to be made</b>, in order to include staff from protected groups.</p> <p>This analysis <b>has not considered data relating to Output selection. This will be considered in future EIAs.</b></p>
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