

Code of Practice

Institution name: University of Bath

Date of submission: 11-15 May 2026

Part 1: Introduction

1.1 Code of Practice principles

The University of Bath's Code of Practice for the Research Excellence Framework (REF) 2029 is a living document that has been developed in consultation with staff and will be reviewed and updated at least annually.

The University of Bath is committed to fostering an excellent, inclusive and responsible research environment, and this Code of Practice (CoP) sets out how we will apply those values in preparing our [REF 2029](#) submission. It outlines how we will make key decisions required for our submission, including identifying contracts that contribute to the [volume measure](#) and [selecting outputs](#).

REF 2029, as an institutional submission, presents an opportunity for the University of Bath to showcase the strength and impact of our research in addressing global challenges. We have worked, and will continue to work, collaboratively across the University to ensure that our submission accurately reflects both the diversity of our research and the culture that enables it.

The purpose of the CoP is to ensure that our decisions are made in accordance with the principles of robustness, transparency, and equity and inclusion as set out in the REF 2029 guidance:

- **Robustness:** *Ensuring our submission is an accurate representation of our research, its strengths and diversity*

Our policies and processes ensure a robust and accurate identification of contracts contributing to the REF volume measure. All University *research and teaching* contracts are included, providing comprehensive and consistent identification of staff with significant responsibility for research. For our *research* staff contracts, research independence is determined through documented job descriptions, pay grades and promotion criteria, which set out expected levels of independence and align directly with the REF definition. These processes are applied by Human Resources (HR) and Research & Impact Services (RIS), ensuring decisions are contract-based, verifiable and separate from academic REF decision-making.

- **Transparency:** *Ensuring our approach is clear and effectively communicated*

The CoP was developed in collaboration with staff, staff working groups and committees, and staff were invited to contribute through an all-staff survey, in-person and online events, and discussions at key staff committees with Trade Union representation. To ensure all colleagues

could access the draft, our CoP was promoted through our website and newsletters, an all-staff email sent to all staff, and electronic copies sent by HR and Line Managers to staff on leave of absence or based outside the UK. Accessibility was supported by providing information in various formats, written and verbal, and by conducting accessibility checks. As the CoP has been developed and refined through consultation, the latest version of the CoP, along with the Equality Impact Assessment (EIA) and contact details, has been made available internally on our website.

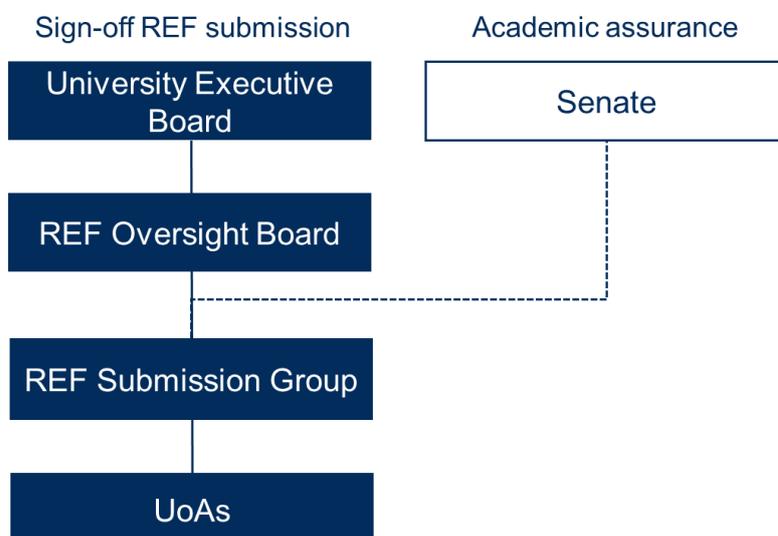
Details of key dates and timings of CoP development, publication, consultation with staff and committees and approval are included in Appendix A. Further information about the roles and responsibilities of the committees can be found in Section 1.2.

- **Equity and inclusion:** *Ensuring our submission is fair, impartial and values and supports diversity of people and research*

The University of Bath promotes an inclusive and equitable research environment that values the excellent research produced by our diverse community. We recognise and support the wide range of roles, practices and contributions that are necessary for our collective success. These values are embedded throughout our CoP and the decisions, policies and procedures for REF, to ensure this diversity is reflected in our submission. All individuals involved in decision-making complete training in equality, diversity and inclusion, including mitigating unconscious bias, and undertake responsible research assessment training as appropriate, to ensure that our processes are fair and consistent. Our processes will be monitored through our EIA to ensure they support an inclusive and representative submission and that we meet our public sector equality duties.

1.2 Governance

To ensure transparency and effective oversight of our REF 2029 preparations, the University has established a clear governance framework that defines responsibilities, reporting lines and assurance mechanisms. The diagram below illustrates the committees and groups involved and how they work together across the institution.



Our University Executive Board (UEB), chaired by the Vice-Chancellor has overall responsibility for our REF submissions. Our REF Oversight Board is chaired by the Pro Vice-Chancellor (Research) and includes as members the four Faculty/School Deans and the Director of Human Resources. Accountable to UEB, this Board recommends our REF Submissions.

The REF Submission Group is responsible for developing our REF submissions in line with our Code of Practice. Chaired by the Pro Vice-Chancellor (Research) this Group has wide representative membership including the Associate Pro Vice-Chancellor (Research), Associate Deans (Research) and colleagues from RIS, HR and the Library. The Group is accountable to the REF Oversight Board and provides academic assurance to Senate that our submissions have been developed in line with our Code of Practice.

1.3 Institutional context and policies

The University's approach to REF 2029 is shaped by our institutional values and our commitment to building a research culture that puts people and practice at its core. We are proud of our supportive and close-knit community and have developed policies and frameworks that foster an inclusive, responsible and positive research environment, within which this CoP operates. We recognise that challenges remain. Our goal is to create a collegiate and inclusive environment for all staff groups at the University, making sure we support research enablers including technical and experimental staff. We are working to improve diversity in senior positions and to close progression and pay gaps, particularly for women and staff from under-represented groups. Ensuring that all staff experience a healthy, supportive working culture remains a priority, including continued support for our LGBTQ+ community and embedding race equality as an institutional priority.

Equality, diversity and inclusion

The University of Bath's [vision for EDI](#) is to embed equality, diversity and inclusion in all we do, enabling us to thrive individually and collectively, and to contribute to an increasingly diverse and interconnected world.

This commitment is supported by our institutional strategies and frameworks, including accreditations such as Athena Swan, the Race Equality Charter, Disability Confident Leader status and the Living Wage, as well as investment in leadership roles and actions that advance our EDI objectives and respond to recommendations from the REF 2021 EIA. As an employer and public sector organisation, the University meets its responsibilities under equality law to eliminate discrimination, advance equality of opportunity and foster good relations, and through the EIA (Appendix A) we are assessing the impact of REF decisions, processes and procedures on staff with [protected characteristics](#) to ensure that no group is disadvantaged.

Responsible research assessment

The University of Bath has a long-standing commitment to responsible research assessment (RRA), first articulated in 2017 when the University co-produced its original RRA principles. Drawing on the [Leiden Manifesto](#) and [The Metric Tide](#), Bath became one of the first UK universities to set out an institutional approach to RRA and the team responsible won an ARMA award for its delivery. Bath's commitment has continued, and in 2024 the principles were updated to reflect the University becoming a signatory of [DORA](#) and alignment with the four

core commitments of [CoARA](#). The refresh followed extensive consultation across the institution, involving academic and research staff, and research enablers including technical staff in a series of disciplinary workshops.

Our RRA principles underpin the approach set out in this CoP and ensure that all research assessment and management at the University of Bath is:

- **Centred on expert judgement**, supported by carefully chosen and agreed criteria and indicators.
- **Set in the broader environment** - considering possible consequences for behaviour, or the potential to reflect or introduce biases.
- **Supported by reliable data**, with limitations acknowledged.
- **Tailored: one size does not fit all**. Considerate of disciplinary differences and scale of research activity.
- **Transparent**, with open criteria and quantitative data available to those assessed.
- **Inclusive: we value a diversity of research outputs and impact**, as well as a diversity of contributions.

The [University of Bath Research Culture Action Plan](#), published in 2024, reinforces the value of ‘quality over quantity’ and the need to explicitly value a diverse set of contributions. A Responsible Research Assessment Working group was established to support departments and teams to review and update their local assessment practices and ensure alignment with the institutional approach. From 2025, the University introduced new RRA training for assessors and managers. The training is mandatory for ‘frequent assessors’ such as Heads of Department and Deans.

Individuals who are concerned that any research assessment practices at the University, whether or not they relate to REF, do not align with the principles are encouraged to contact the Pro Vice-Chancellor (Research) via pro-vc-research@bath.ac.uk. Concerns will be treated confidentially and receive an initial response within 20 working days.

Research culture

Over the last decade the University of Bath has continuously strived to enhance our research environment. Our [2021 University Strategy](#) was built on the enablers of a good research culture - inclusion, connectivity, development and responsibility. We routinely monitor, test, and learn from interventions to continue to make substantial progress towards fostering an inclusive community (inclusion), developing our people (development), strengthening our strategic partnerships (connectivity), and conducting high-quality, responsible, ethical, and open research (responsibility).

In 2022 and 2024 we conducted large scale consultations across the University to identify gaps in positive research culture across job families, career stages, and faculties. As a result, our Research Culture Action Plan was launched in late 2024. We have also responded to staff concerns about job precarity and in 2023 signed a sector-leading anti-casualisation agreement that enhances job security and fair working conditions for part-time and fixed-term staff. Since 2025, our ‘Researcher Academy’ has offered postdoctoral researcher staff support and development opportunities to help them reach their full potential. The academy also provides a stronger voice to research staff, identifying the issues and priorities which matter most to them

and supporting the delivery of an action plan to improve their employment terms and working environment.

Using AI with integrity

The University recognises that artificial intelligence (AI) is a significant area of rapid technological change which offers both opportunities and risks. In order to mitigate the risks, the University position on the usage of AI in research is aligned with the [UK Research Integrity Office \(UKRIO\) guidance](#). To support our community in using AI responsibly, we have implemented the following:

- As part of our new University-wide Research Integrity Training, all researchers can engage with guidance on the responsible use of AI.
- We have updated our Ethics system (Ethics@Bath) to specifically ask researchers about whether and how AI has been used in completing the application form, and whether and how it will be used in the proposed research.
- We are developing a University-wide policy on the use of AI in research in line with UKRIO and funder expectations, and are inviting staff to help co-design it.

Information and data

Our information and data policies (data protection, data governance, GDPR) will align to University guidelines and Research England guidance, as follows:

- All personal data collected for the REF submission, including during the preparation stages and final submission, will be treated as confidential and will be handled in accordance with the University's [Data Protection Policy](#).
- As part of the University Records Retention Schedule, the University will develop a REF-specific data retention schedule once guidance from the Funding Bodies is available.
- All such information will be limited in circulation to only those staff who need access to inform the preparation and assessment of the University's REF submission. We will ensure that all staff accessing REF data have completed their mandatory data protection training and are up to date with University and REF policies and guidelines.
- Decisions from formal meetings that shape our REF submission will be recorded in meeting minutes. The minutes will be stored in line with University guidelines.

Living up to our values

Individuals are encouraged to provide feedback on our REF policies and procedures through the consultation and staff engagement opportunities on this CoP. If anyone has concerns that practices at the University of Bath are not aligning with this CoP during implementation, they should contact the Deputy Vice-Chancellor and Provost, as Chair of the University's Equity, Diversity and Inclusion Committee (deputy-vc@bath.ac.uk). A Microsoft Form will be created as an alternative route for those who would prefer not to use email. The Deputy Vice-Chancellor and Provost will maintain confidentiality regarding the concern, consult with the persons responsible for the process, and provide an initial response to the individual within 20 working

days. Any necessary actions or adjustments required will be communicated to the Pro Vice-Chancellor (Research).

1.4 Update on Actions Since REF 2021

The University has taken forward actions to address issues highlighted in our 2014 and 2021 REF equality impact analyses: under-representation and progression gaps in parts of the research community; the desire to improve the living and working environment for staff; and the need to raise awareness and provide training to support a culture of inclusion and belonging. Some key examples are given below:

Action	Under-representation	Improved environment	Culture of inclusion awareness raising
Created the 2024 Research Culture Action Plan, together with the refreshed RRA principles and associated training, providing a clearer and more consistent framework for inclusive practice across research and research management.		✓	✓
Established new EDI and culture leadership positions both centrally and at Faculty/School level, including an LGBTQ+ lead, which are formally recognised through workload allocation, promotion criteria and responsibility allowances.	✓	✓	
Formed a central Culture and Inclusion team to provide advice, support and guidance on equality and diversity-related issues.		✓	✓
Expanded our set of staff networks that provide dedicated spaces for colleagues sharing particular circumstances or characteristics to connect with others.	✓	✓	
Reduced our median gender pay gap by 4.89% to 15.01% (2017 to 2024, latest data available) but continue to focus on reducing the gender progression gap which drives this disparity, for example, funded the Women Academic Change Agents (WACA) Network to understand and improve senior women academics' promotion experiences at Bath and establish new support such as coaching sessions and a male ally mentor group.	✓	✓	

<p>Implemented a Parental Leave Support Fund for academics to support academics who have taken a break for caring responsibilities to re-establish their research with a small grant. The success of this pilot has led to it being established as business as usual offer, expanded to all staff.</p>		✓	
<p>Launched a major new training programme on bullying and harassment which has been completed by over 90% of staff and increased earlier reporting through the report and support tool by over 50%, indicative of an increase in awareness and trust.</p>			✓
<p>Published authorship and acknowledgement guidance that more fairly recognise diverse contributions.</p>			✓

Part 2: Identifying Staff Contracts with Significant Responsibility for Research (SRR)

For REF 2029, universities will no longer submit staff information. To support a move away from the assessment of individuals there is a new approach to determining research volume for REF, based on an average FTE from eligible contracts over a number of years drawn directly from the HESA record. To enable this calculation the University must ensure that all contracts with **significant responsibility for research** are identified.

Our *research and teaching* contracts (coded in HESA as ACEMPFUN 3) fully and accurately identify all staff contracts with significant responsibility for research and therefore are marked annually in HESA as contributing to the volume measure calculation for REF 2029. If more than one contract is held by the same person, each contract is assessed independently according to its specific duties. No further processes are required.

Part 3: Determining Research Independence

As noted in Part 2, information on individuals is no longer part of the REF submission, and instead the FTE of eligible contracts is used to calculate the university's research volume. This section describes the process the University uses to identifying staff contracts with **research independence**, for the sole purpose of the REF volume measure. Inclusion or exclusion of a staff contract in the volume measure has no impact on whether an individual's research output or impact case study will be submitted to REF.

Research independence means that the staff member undertakes self-directed research, rather than primarily carrying out another individual's research programme.

3.1 Policies and Procedures for determining research independence

Criteria and Evidence

The University's *research* contracts (coded in HESA staff record as ACEMPFUN 2, research-only) comprehensively identify all posts where the primary academic employment function is research. Within this population, the University has a consistent and documented approach to recruitment and promotion with [job description templates](#) and [promotion criteria](#) publicly available on the University's website. These documents set out clear expectations for the level of research independence associated with each grade.

Analysis undertaken by RIS and HR confirmed that pay grade reliably reflects the expected level of research independence in line with the REF 2029 definition. The job purpose statements for research roles demonstrate a structured progression in independence: Grade 6 Research Assistants and Grade 7 Research Associates provide subject-specific research support to a Principal Investigator or Co-Investigator, whereas Grade 8 Research Fellows are expected to conduct their own research, secure external funding through grants or fellowships, and build a research group appropriate to their discipline. Promotion criteria reinforce this threshold, with progression from Grade 7 to Grade 8 requiring candidates to demonstrate that they have "established their own area of independent expertise in research."

On this basis, and for the specific purpose of identifying research independent staff contracts for inclusion in the REF FTE volume measure, the University will apply the following criteria:

- Grade 8 and above research staff contracts will be considered research independent.
- Grade 7 and below research staff contracts will not be considered research independent.

Research staff on non-scale contracts will be salary checked against the University's [pay and grading structure](#) to determine the grade equivalent and then treated as that grade for the purpose of identifying research independence.

Two exceptions apply:

1. Grade 8 research staff contracts (or non-scale equivalent) where the holder is a student, and whose job post in the HR system is for a studentship, will be considered not research independent and excluded from the volume measure.
2. Grade 7 research staff contracts (or non-scale equivalent) holding a research fellowship recognised by the REF Funding Bodies as [independent](#) will be considered research independent and included in the volume measure.

This approach is based on role expectations aligned with the REF 2029 definition of research independence, not individual characteristics or performance.

We recognise that there may be staff whose performance does not align to the expectations of their post and grade. Under- or over-performance is addressed through appropriate internal performance management measures (such as the annual [Staff Development Performance Review or Career Conversations](#)) rather than through REF processes. The categorisation of contracts for the purposes of REF has no bearing on other aspects related to staff performance or careers.

Decision-Making and Communication

The classification of research independent staff is carried out by the People Insights and Systems team in HR (responsible for classification based on grade) and the Research Excellence & Impact team in RIS (responsible for applying defined exceptions). These determinations are administrative in nature and independent from academic decisions made at departmental or Unit of Assessment (UoA) level.

These decisions sit within the University’s established processes for maintaining accurate HESA staff data. Since Spring 2024, the University has been actively working on improving the data quality and standardising the processes that feed into our HESA submission. These processes operate throughout the year, include regular staff list checks, and are subject to institutional data quality controls. Together, they provide a robust and well governed framework that supports the accuracy of the data used for the REF volume measure.

Decisions on how individual contracts are categorised for the REF volume measure do not affect a member of staff’s role, career progression, or ability to contribute to the REF submission. For this reason, the University does not issue individual notifications confirming whether a contract is included in the volume measure. The criteria and processes are set out in this CoP, which has been made available to all staff.

Staff can determine whether their contract FTE is included in the REF volume measure by checking their contract documentation or by emailing the HR Management Information team (hirmi@bath.ac.uk) to request this information. To align with the monthly HR REF data reporting cycle, queries about contract inclusion will be actioned and responded to within 20 working days.

3.2 Staff, Committees, and Training

Roles and responsibilities

The methodology for determining research independence was developed by RIS, reviewed by the REF Submission Group, and approved by the REF Oversight Board, which has institutional oversight of REF policy and governance. The implementation of the policy is carried out by the following teams:

Committee / team / staff	Role	Responsibility
People Insights and Systems team, HR	Applies the research independence criteria based on grade to individual contracts.	Decision-making
Research Excellence & Impact team, RIS	Applies the defined exceptions to individual contracts.	Decision-making

Training

Categorisation is made based on the criteria and evidence outlined above and so no specialist training is required for staff involved in this process. No criteria associated with individuals (e.g. performance, characteristics or other factors) will be used in the categorisation. Nevertheless,

all staff involved in the process will have completed the University's mandatory training modules on Diversity in the Workplace and Unconscious Bias available through the University's [e-learning environment](#).

3.3 Appeals

Since decisions on how individual contracts are categorised for the REF volume measure do not affect a member of staff's role, career progression, or ability to contribute to the REF submission, there is no separate appeals process for this decision.

Decisions made about the recruitment and promotion of research staff are independent of REF decisions and are subject to the University's established procedures. Members of academic staff have the right of appeal against decisions in relation to their appointment or progression, with further information available on the [Academic Staff Appeal Committee](#) page.

If a member of research staff believes that the CoP has not been followed with respect to Research Independence or an error has been made in the categorisation of their contract, they may raise this for review by the Deputy Vice-Chancellor and Provost, who is not otherwise involved in REF decision making processes (see section 1, Living up to our values).

3.4 Equality Impact Assessment

The criteria and process for determining research independence was reviewed and consulted on as part of the EIA. As the determination is based on the expectations of the contract, as defined in the job description and promotion criteria, the EIA concluded that the policy itself does not have a positive or negative impact on staff

Two broader risks were identified in the wider institutional context. First, there is a risk that the use of grade to determine research independence could, over time, influence recruitment or promotion decisions, or interact with existing structural inequalities in ways that affect particular groups. To monitor this, the University will review the profile of research staff on contracts considered research independent versus not research independent, and annual promotion patterns from Grade 7 to Grade 8, with a focus on protected characteristics and part-time working. Any concerning trends will be addressed through established HR promotion and performance processes.

Second, the EIA identified a risk arising from historical variation in contract types, which could lead to mis-representation in the research-independent population. A review of HR processes was undertaken in Autumn/Winter 2025, and we will ensure that standard Bath contracts are used consistently going forward. Where legacy contracts are identified, we will align these to standard contracts to minimise variation.

Part 4: Allocating Contracts to UoAs

4.1 Policies and procedures

Criteria and evidence

Contracts must be allocated to a UoA to enable accurate calculation of the volume measure for each disciplinary area. The criterion for allocation is alignment with the relevant UoA descriptor in the REF guidance.

The University's organisational units (whether department, faculty or school) generally align with [REF UoA descriptors](#)¹, meaning that in many cases the disciplinary area associated with a contract is clear. If departmental affiliation does not provide a clear match to a single UoA, for example where research spans multiple disciplinary areas, additional evidence will be considered.

The evidence used to allocate contracts to UoAs is as follows:

- Departmental affiliation, which provides the primary indication of UoA fit
- Affiliation with research group, centre or institute
- Disciplinary area of research outputs
- Disciplinary area of supervised students
- Discussion with the researcher regarding which UoA best fits their research activity
- Primary funding sources
- Relevant professional affiliations.

Decision-making and communication

An initial mapping of the University's departments to REF UoAs was undertaken RIS in 2022, drawing on the REF 2021 UoA descriptors. This was reviewed by the REF Submission Group and approved by the REF Oversight Board. The mapping is reviewed annually, or as required by changes to UoA descriptors or university organisational structure.

Initial allocation of contracts to UoA is conducted by RIS based on departmental affiliation. Draft UoA allocations are then reviewed at departmental level and recommendations are made at this level wherever the disciplinary alignment is clear. If more than one contract is held by the same person, each contract is assessed independently and could be assigned to different UoAs.

Where more than one potential UoA is identified, drawing on the evidence outlined in the criteria section, the decision is reviewed and final recommendations are agreed at institutional level (see 4.2 for details). These decisions sit within the University's established processes for maintaining accurate HESA staff data, operating throughout the year and subject to institutional data-quality controls.

Decisions on the allocation of individual contracts to UoAs follow the same principles set out in Part 3: they have no impact on individuals and decisions are based on the documented criteria

¹ REF 2021 UoA descriptors will be used until REF 2029 descriptors are published.

and process outlined in this CoP. Individual notifications will not be issued. Staff may request confirmation of the allocation of their contract(s) by emailing the HR Management Information team (hrmi@bath.ac.uk).

4.2 Staff, committees and training

Roles and responsibilities

The above process was developed in consultation with members of the REF Submission Group, REF EIA Advisory Group and wider Faculty/School REF representation and then approved by the REF Oversight Board following the all-staff consultation process.

The implementation of the process is carried out as follows:

Committee / team / staff	Role	Responsibility
Department / UoA level: Heads of Department / UoA Leads and other appropriate experts	Review draft UoA allocations. Use additional criteria where required. Propose UoA allocations for staff.	Advisory
Faculty / School level: Deans, Associate Deans Research and other appropriate experts	Review proposed allocations, make Faculty/School level recommendation.	Advisory
Institutional level: REF Submission Group	Consider and recommend Faculty/School allocations.	Advisory
REF Oversight Board and University Executive Board (UEB)	Final institutional sign-off of UoA allocations.	Decision-making

Training

All individuals involved in allocating contracts to UoAs will complete the following University training modules available through the University's [e-learning environment](#), and completion of training will be monitored by RIS:

- Diversity in the Workplace
- Unconscious Bias
- Responsible Research Assessment

4.3 Equality Impact Assessment

The initial process was reviewed by our REF EIA Advisory Group (See Appendix A), via consultation and through completion of an EIA. As contracts (not individual staff members) are assigned to UoAs based on the disciplinary alignment, there are no REF decision-making processes that could have a positive or negative impact on individuals. Although no potential unequal outcomes for staff were identified, a risk was raised about potential unconscious bias in allocation of contract to UoA for cases where additional evidence has to be reviewed. It was noted that all reviewers will undertake appropriate training but that this could be further mitigated by ensuring that more than one person is reviewing the UoA allocations (actioned) and that the allocations are reviewed by a committee (actioned).

Part 5: Selecting outputs

In REF 2029, [outputs will be decoupled](#) from individual staff and output submissions from eligible research and research-enabling staff are welcomed. There is no requirement for staff whose contracts are included in the REF volume measure to also submit a research output. Likewise, outputs by staff whose contracts are not included in the REF volume measure can be submitted if they meet the REF eligibility criteria and the UoA descriptor and quality threshold criteria. Output quality is the University's primary consideration for selecting outputs for submission to REF 2029, with representativeness considered alongside.

5.1 Policies and Procedures

Identifying eligible outputs

For an output to be [eligible](#) for the REF submission, it must be the product of research, must have been brought into the public domain during the allowed publication period, have a substantive link to the University, and meet the scope of the open access policy where applicable. [Pure](#) (the University's research information management system and institutional repository) is used to identify outputs eligible for REF. All staff who publish research can, and are strongly encouraged to, add their outputs to Pure.

Output eligibility is determined by RIS who, in collaboration with the Library and HR, verify output publication date (must be between 1 January 2021 and 31 December 2028), substantive link to institution, and the open access status. RIS produce the initial eligible output lists meeting these criteria for UoAs to review.

As part of internal review, UoA Leads verify that the output meets the REF definition of [research](#).

Identifying substantive link to outputs

The University identifies a substantive link between an output and the institution in line with the [REF guidance](#). A substantive link is demonstrated through an eligible employment relationship held by the author during the REF period. Eligible employment relationships are those lasting at least 12 continuous months (minimum 0.2FTE) in which the role descriptor includes an explicit expectation of research activity. HR contract data is used to determine the timing and nature of the employment relationship. Outputs authored solely by teaching-only or other non-eligible contracts such as postgraduate research students, or visiting or honorary staff are not included. The University does not intend to use the 'exceptional situations' permission route to submit outputs solely authored by such staff.

There is an exception for substantive link for long-form or extended process outputs published before the eligible employment relationship which we will consider as appropriate.

Selecting outputs where the substantive link is via former staff

To represent the full range of research undertaken within the REF period, outputs from former staff will be considered on the same basis as those authored by current staff, with the following additions to the policy and procedures for *outputs published after the staff member left*:

1. If the staff member left due to compulsory redundancy, their output will not be eligible for submission. An additional HR check will be performed to identify such outputs.
2. If an output by former staff is published with a Bath affiliation, the Library will add it to Pure and the same eligibility checks as for outputs by current staff will be applied.
3. If outputs are published by former staff which may be eligible but do not have a Bath affiliation, RIS will liaise with the department to determine if a substantive link to institution can be confirmed (e.g. internal research support, presentations of work-in-progress, external grants supporting the research). Where substantive link is confirmed and output quality justifies its inclusion in REF submission, consent will be sought from the author for Bath to submit the output. Outputs without a Bath affiliation will not be submitted if consent is not obtained.

To identify potential outputs as per point 2 and 3, the Library will use records indexed in Scopus. Advice about correctly providing the University of Bath as an affiliation for research conducted here will be included in exit information for relevant departing staff.

Determining significant research contribution

In line with the University's guidelines on [Authorship and acknowledgment in research outputs](#), the University expects that all individuals credited on the output as authors will have made a substantial or significant contribution to the output. If additional information on the significant research contribution made by the individual identified as the substantive link is required in any UoAs we will submit to², staff will be asked to contribute a short narrative statement of their contribution.

Assigning outputs to UoAs

Outputs will be assigned to UoAs based on disciplinary fit with the REF UoA descriptors. Initially, outputs will be reviewed within the UoA that best aligns with the internal author's department. For staff based outside of the academic departments, output topic will be used to identify the appropriate UoA for review. We will review outputs in multiple UoAs as appropriate. Output fit and potential for cross-review in different UoAs will be checked at multiple points, including via requests to staff to self-identify UoAs for individual outputs, UoA, Faculty and School, or institutional reviews, or via peer review.

Outputs are decoupled from individuals, and whether the staff members with the substantive link have their contracts in the same UoA will have no bearing on the decision. The University will submit outputs to more than one UoA where this represents the excellence of interdisciplinary and collaborative research at the University.

Procedures for supporting diversity of outputs

The University encourages the inclusion of diverse outputs, recognising differences in disciplinary research practices and methods for sharing within and beyond the profession. All output types can be recorded in Pure and guidance on how to do this will be published and actively promoted to staff to maximise the capture of such outputs. UoA Leads will be provided with reports on the range and proportion of output formats associated with their UoA. This will

² To be confirmed when full REF panel guidance is published.

enable UoA Leads to consider whether the selected outputs reflect the norms and behaviours of their area, and to identify any potential under-representation of particular output types. These indicators are intended to inform judgement, rather than establish quotas.

Ensuring submissions are representative of the research undertaken

The University will aim to maximise the quality of its REF submission while ensuring that the selected outputs are representative of the research within each UoA. Output quality will be the primary consideration and representativeness will be considered alongside.

RIS and the Library are currently investigating how various data sources can help us understand and analyse representativeness, and the CoP will be updated following the publication of REF panel guidance in this area.

UoA Leads will draw on their own understanding of the disciplinary landscape, including the research strategies, major collaborations, programmes, centres and institutes that shape activity within the UoA, when considering the breadth of the selected outputs. This knowledge will be supplemented by summary reports provided by RIS and the Library on the breadth of research activity within each UoA. These will include high level indicators of the range of research themes, output formats, and substantive links associated with the UoA's outputs. The Library will undertake analysis of SciVal topics, and, where available on Pure output records, information about keywords, fingerprints and Sustainable Development Goals will be utilised. Together these will enable UoA Leads to consider whether their selected set reflects the range and scale of research activity. These indicators are intended to guide informed decision-making rather than to establish specific quotas or targets.

To ensure breadth and representativeness, the University does not intend to submit more than five outputs associated with a single substantive link within a UoA, except in exceptional circumstances, which would be explained in the Statement of Representation and included as part of the narrative submitted to REF. Selections will reflect the range of research and researchers within each disciplinary area.

Staff whose outputs may be eligible, particularly staff from technical and professional services where research forms part of their duties and aligns with descriptors of UoAs to which the University will make a submission, will be encouraged via direct communications to propose their outputs through Pure according to guidance provided. In doing so, staff will be asked to confirm that they believe outputs meet REF eligibility criteria and to indicate the UoA to which the work is most closely aligned.

Policies and procedures and responsible research assessment practice

As set out in Part 1, the University's responsible research assessment principles underpin the policies and procedures used to select outputs for submission to REF 2029.

The Faculties and School coordinate the review of outputs authored by academic and research staff within their departments and will be guided by our seven steps to [designing research assessment](#). Where the volume of eligible outputs prevents a review of all outputs, individuals will be asked to self-nominate outputs for assessment.

The purpose of the output review process is to identify the strongest outputs to include in the University's submission.

Each output is assessed against the REF criteria of originality, significance and rigour. Expert review is the primary basis for assessment. Quantitative indicators such as citation data will be used only to inform judgements, and only where meaningful and appropriate indicators can be identified. Limitations inherent in quantitative data are explicitly acknowledged. Journal-based metrics, publication venue, format or language will not be used as a surrogate measure of the quality or impact of outputs. Reviewers apply criteria in ways that reflect disciplinary norms and expectations, using the most up-to-date REF panel guidance available.

Each output is reviewed independently by a minimum of two reviewers on a 13-point scale to provide granularity against the REF star ratings. Where needed, external independent review is sought. For outputs in languages other than English, including British Sign Language, additional information from the author may be sought to facilitate the review (if required by the reviewers). Such outputs will not be treated less favourably and where possible will be reviewed in their original format.

Scores are calibrated across outputs within each UoA to support consistency. Output selection for submission to REF 2029 will be based on assessments with the primary aim of submitting the highest quality portfolio (using the criteria of originality, significance and rigour), whilst also representing the breadth of research undertaken within each disciplinary area. Where appropriate, outputs nominated for double-weighting by individuals or by a reviewer, will be considered by the UoA Lead. UoA Leads will make selection choices to support the strongest overall submission for their UoA. Selections will be recommended to the REF Submission Group.

Scores will be used solely to identify the strongest outputs for REF submission and will not be used for any other purpose, including individual or organisational unit-level performance assessment. As the submission of outputs to REF has no bearing on an individual's performance review or career progression, we will not inform staff members whether, or which, of their outputs have been submitted.

5.2 Staff, committees and training

Roles and responsibilities

The above process was developed in consultation with members of the REF Submission Group, REF EIA Advisory Group and wider Faculty/School REF representation. The implementation of the procedures is carried out as follows:

Committee / team / staff	Role	Responsibility
RIS, Library, Faculty/School professional services	Confirm substantive link to institution; provide reports on breadth, diversity of outputs, and research activity; support review and calibration processes; coordinate review of outputs across multiple UoAs.	Advisory

Library	Check eligibility of outputs against REF criteria; monitor publications by former staff; identify outputs requiring substantive link review.	Advisory
HR	Provide employment data to determine substantive link; identify compulsory redundancy cases.	Advisory
UoA Leads and other appropriate experts	Coordinate output review within the UoA; confirm outputs appropriate for review in multiple UoAs; collect statements on significant contribution to research (where applicable); consider double weighting requests, ensure selections reflect quality and breadth; recommend final output selections to REF Submission Group.	Advisory
Reviewers	Assess outputs against REF criteria in line with RRA principles; flag outputs appropriate for review in multiple UoAs.	Advisory
REF Submission Group	Review output assessments and selections and provide University-level scrutiny.	Advisory
REF Oversight Board	Review output selections and provide University-level scrutiny.	Advisory
University Executive Board	Final institutional sign-off for output selections.	Decision-making

Training

The Faculties and School provide assessment and calibration training for reviewers. All individuals involved in reviewing or approving outputs for submission will complete the following University training modules available through the University's [e-learning environment](#):

- Diversity in the Workplace
- Unconscious Bias
- Responsible Research Assessment

Completion of training will be monitored by RIS.

5.3 Equality Impact Assessment

We recognise that staff make contributions to research in many ways. Inclusion or exclusion of an output in the REF submission is not a reflection on an individual member of staff or the quality of their work. The EIA examined the processes to establish the pool of eligible outputs, identify substantive links, the allocation to UoAs, and ensuring that submissions are representative. All University processes are in line with the REF 2029 decision to break the link between individual staff members and submitted outputs, and the EIA found no differential impact arising from the design of the policies and procedures for output selection. There are a

number of risks associated with implementation of these procedures and we will take actions to monitor and mitigate these, including:

- **Risk of bias in identifying the total eligible output pool:**
 - Staff members will receive targeted communications in different formats to encourage all outputs to be recorded in Pure.
 - Ensure peer reviewers have correct expertise for discipline so that judgements on what constitutes research do not disfavour certain methodologies or approaches.
- **Risk of bias in the selection of outputs for submission:**
 - The diversity of University reviewer teams and internal REF panels will be monitored in relation to protected characteristics, and external reviews used to supplement internal reviews.
 - RIS and HR will analyse the protected characteristics of all University of Bath authors associated with a) the complete list of reviewed outputs and b) outputs selected for submission to REF 2029. This recognises that outputs may have multiple contributors with a substantive link to the University. Any notable variation in scoring or selection identified will be reviewed by the UoA Lead and other appropriate experts, and adjustments discussed and agreed through the established governance chain.
 - Available data will be used to check the representativeness of selected outputs compared to the total eligible pool, in terms of representation of outputs by research centres and institutes, major research programmes, representation of disciplinary spreads and fit against research strategy.

Part 6: Appendices

Appendix A: Equality Impact Assessment including details of key dates and timings of CoP development and consultation

Disclosure: Generative AI (Microsoft CoPilot) was used in the drafting of this document to improve the readability by suggesting edits for clarity, to remove duplication, refine language and explore alternative phrasing. The use of AI did not replace human review, judgement or decision-making at any stage.

Appendix A

Equality Impact Assessment for Research Excellence Framework (REF) 2029

First Iteration – Spring 2026

1. Executive Summary

The first iteration of the REF 2029 Equality Impact Assessment (EIA) was developed during the period from Autumn 2025 to Spring 2026 in tandem with the development of the University's REF 2029 Code of Practice (CoP). The EIA covers all the processes defined in the CoP to support the University of Bath to identify eligible staff and select outputs for REF 2029. This EIA iteration is a qualitative review that has facilitated our consideration of equality issues whilst developing policy and processes. Future iterations will provide review and data analysis at the point of decision making, as well as any substantive changes proposed to the CoP.

This EIA has not identified any systematic equality issues.

2. Introduction to the Equality Impact Assessment

The EIA is a mandatory component of the REF 2029 CoP, ensuring Higher Education Institutions uphold their legal responsibilities under the Equality Act 2010.

As REF 2029 is a public process, all decisions must be assessed under the Public Sector Equality Duty (PSED) for potential equality impacts. The University of Bath has conducted an EIA for the CoP, concurrently with the development of the following processes:

- Identifying staff contracts with Significant Responsibility for Research (SRR)
- Determining Research Independence (RI)
- Allocating contracts to Units of Assessment (UoA)
- Selecting outputs
- Managing appeals and review processes

As with the CoP, this EIA is a living document. It facilitates our consideration of equality issues whilst developing policy and processes, at the point of decision making, and at any point when substantive changes are proposed to the CoP. We will perform quantitative analysis once data is available. This EIA provides documented evidence that equality considerations on both process design and impact were conscientious, rigorous, and informed.

3. Consultation and Engagement

This EIA has been developed in collaboration with Faculty/School Equality, Diversity and Inclusion (EDI) experts (collectively referred to as the EIA Advisory Group), and the associated CoP developed in consultation with relevant University Committees and all staff. Consultation processes have included staff networks representing staff with protected characteristics.

The table below shows the consultation completed to date.

<p>Early policy development and process design (Sep – Dec 2025)</p>	<p>Initial discussions with UoA Leads, Associate Directors of Research (ADR) and Faculty/School Research Managers (3 Sept).</p> <p>Potential CoP processes shared with REF Submission Group and REF Operations Group (Sept) and EIA Advisory Group (8 Oct).</p> <p>Initial EIA draft shared with EIA Advisory Group (v1.0, 17 Dec).</p> <p>REF progress webpage published with opportunities for staff input (Dec).</p>
<p>Drafting and committee input (Jan – Feb 2026)</p>	<p>Initial drafts shared with REF Submission Group and REF Operations Group (CoP v1.0 and EIA v1.1, 23 Jan).</p> <p>Updated draft shared with EIA Advisory Group (EIA v1.2, 3 Feb).</p> <p>Drafts shared with EDI Committee (CoP v1.1 and EIA v1.2, 5 Feb).</p>
<p>University-wide consultation (Feb – Mar 2026)</p>	<p>CoP and EIA combined as one document. Draft CoP published on University homepage and circulated via staff networks; two open staff meetings held; all-staff survey launched (v2.0, 23 Feb).</p> <p>Draft shared with Research and Knowledge Exchange Committee (v2.0, 3 Mar)</p> <p>Draft revised and shared with Research Culture Steering Group (v2.1, 19 Mar).</p>
<p>Finalisation and approval (Mar – May 2026)</p>	<p>Revised version shared with REF Submission Group for final discussion and recommendation to REF Oversight Board (v3.0, 30 Mar tbc).</p> <p>REF Oversight Board approval and onward recommendation to University Executive Board (v3.1, date tbc).</p> <p>Approval by University Executive Board (v3.1, 14 or 28 Apr tbc).</p> <p>Endorsed by Senate (v3.1, 15 Apr).</p> <p>Submitted to Funding Bodies REF team (v4.0, May).</p>

To ensure due regard is given to the PSED, the core EIA questions below were considered when developing the CoP and its processes.

Eliminating unlawful discrimination

- Could this process or decision disproportionately exclude or disadvantage people with protected characteristics? Protected characteristics under the Equality Act 2010 are:
 - Disability
 - Gender reassignment
 - Marriage or civil partnership
 - Pregnancy or maternity
 - Race (including colour, nationality, ethnic or national origin)
 - Religion or belief
 - Sexual orientation
 - Sex (gender)
 - Age
- Are any criteria, systems, or practices indirectly discriminatory (that is to say, neutral on the surface but unequal in effect)?
- Have reasonable adjustments been considered or applied where appropriate?
- Are there any legacy practices or default assumptions that could disadvantage certain groups?

Advancing equality of opportunity

- Have barriers to access or participation been identified and addressed?
- Do all relevant staff groups have a fair opportunity to contribute to, benefit from, or be considered in this process?
- Have we used disaggregated data to monitor representation, participation, or outcomes?
- Are there opportunities to design this process in a way that proactively supports inclusion or recognises diverse contributions?
- Have steps been taken to minimise over-reliance on metrics or conventions that may structurally exclude some groups?

Fostering good relations

- Have relevant staff groups or equality networks been consulted or engaged?
- Has the process been clearly and transparently communicated, with reasons and routes for feedback?
- Could the approach help build confidence in fairness and trust across different groups?
- Are staff encouraged to raise concerns or suggestions in a constructive and supported way?

4. University of Bath's governance and approach to REF 2029 preparation

Preparing the REF 2029 submission requires substantial effort across the University. To support equality of opportunity, we will monitor the diversity and representativeness of decision-makers involved in REF 2029 preparations, including the composition of relevant committees and roles such as UoA lead.

5. University of Bath's processes for REF 2029 submissions

5.1 Identifying Staff Contracts with Significant Responsibility for Research

Question	Response
1. Process name	Identifying Staff Contracts with Significant Responsibility for Research (SRR).
2. Purpose of the process	The purpose of this process is to define how contracts with SRR will be identified. This will inform the volume measure as reported via the HESA staff return and ensure that the scale of the University of Bath's REF 2029 submission accurately reflects its research capacity.
3. Summary of process <i>NB. Full processes and related roles and responsibilities can be found in the CoP</i>	The process sits within the University's established processes for maintaining accurate HESA staff data. This process will use employment contract data to identify all contracts with SRR. Our <i>research and teaching</i> contracts (coded in HESA as ACEMPFUN 3) fully and accurately identify all staff contracts with significant responsibility for research and therefore are marked annually in HESA as contributing to the volume measure calculation for REF 2029. If more than one contract is held by the same person, each contract is assessed independently according to its specific duties.
4. Is there a potential for a positive or negative impact on people who have a protected characteristic?	No positive or negative impact. As staff with SRR can be identified through a single contract type, and all contracts of this type will be included in the volume measure, there are no REF decision-making processes that could have a positive or negative impact.
5. What are the other risks or potential unequal outcomes and how will these be mitigated?	Potential risk that staff currently on <i>research and teaching</i> contracts are moved to another contract type, meaning their contract would not be included in the volume measure. Movement between contract types will be reviewed annually for trends or potential bias in this group, broken down where possible by protected characteristic. The first review of data will be in Winter 2026 to compare HESA pilot year data (2024/25) and HESA return 2025/26.

5.2 Determining Research Independence

Question	Response
1. Process name	Determining Research Independence.
2. Purpose of process	The purpose of this process is to define how contracts with research independence will be identified. This will inform the volume measure and ensure the scale of the University of Bath's REF 2029 submission accurately reflects its research capacity.
<p>3. Summary of Process</p> <p><i>NB. Full processes and related roles and responsibilities can be found in the CoP</i></p>	<p>The process sits within the University's established processes for maintaining accurate HESA staff data. The University's <i>research</i> contracts (coded in HESA staff record as ACEMPFUN 2, <i>research-only</i>) comprehensively identify all posts where the primary academic employment function is research. Within this population, this process will use the expectations of the contract to determine research independence, as defined in the job description</p> <p>To identify research-independent contracts for inclusion in the REF FTE volume measure, the University will apply the following criteria:</p> <ul style="list-style-type: none"> • Grade 8 and above research staff contracts will be considered research independent. • Grade 7 and below research staff contracts will not be considered research independent. <p>Research-only staff on non-scale contracts will be salary checked against the University's pay and grading structure to determine the grade equivalent and then treated as that grade for the purpose of identifying research independence.</p> <p>Two exceptions apply:</p> <ol style="list-style-type: none"> 1. Grade 8 research staff contracts (or non-scale equivalent) where the holder is a student, and whose job post in the HR system is for a studentship, will be considered not research independent and excluded from the volume measure 2. Grade 7 research staff contracts (or non-scale equivalent) holding a research fellowship recognised by the REF Funding Bodies as independent will be considered research independent and included in the volume measure. <p>Decisions on how individual contracts are categorised is solely for the purpose of the REF volume measure, for this reason, the University does not issue individual notifications confirming whether a contract is included in the volume measure although they can request this information. Additionally the data will only be available to those who need to confirm it for REF purposes.</p>

<p>4. Is there a potential for a positive or negative impact on people who have a protected characteristic?</p>	<p>No positive or negative impact. No criteria associated with individuals (e.g. performance, characteristics or other factors) will be used in the categorisation. Whether or not a contract contributes to the volume measure does not affect whether outputs or impacts associated with those contracts will be submitted to REF 2029, nor does it influence any processes beyond REF. As research independence will be determined via the grade of the contract, there are no REF decision-making processes that could have a positive or negative impact.</p>
<p>5. What are the other risks or potential unequal outcomes and how will these be mitigated?</p>	<p>There is a risk that bias within wider University processes impacts the grade of individual staff members, and therefore whether they are considered to have research independence. This is mitigated by the University through HR's 'Career Progression in the Education and Research Job Family' policy: CPER document</p> <p>To assess whether this risk creates potential unequal outcomes, the following data will be monitored and reviewed for trends:</p> <ul style="list-style-type: none"> • Profile of research only staff considered research independent vs not research independent. • Promotions each year for research staff (Grade 7 to Grade 8) and look at trends in numbers and profile. <p>This review will focus on protected characteristics and part-time working. Results will be analysed at Faculty/School level or university level where numbers are too small for meaningful analysis or could risk identifying individuals. If trends are identified through this analysis, steps will be taken to mitigate these impacts. The first review of data will be in 2026 on HESA Pilot year data.</p> <p>The process assumes that all staff are on a standard Bath contract but some legacy contracts may deviate from the standard and result in inaccurate determination of research independence. To mitigate this risk, in Autumn/Winter 2025, a review of HR processes was undertaken, to ensure that standard Bath contracts are used going forward. Where legacy contracts are identified, these will be aligned to standard contracts.</p>

5.3 Allocating Contracts to Units of Assessment (UoAs)

Question	Response
1. Process name	Allocating Contracts to Units of Assessment (UoAs).
2. Purpose of process	The purpose of this process is to ensure that the University of Bath applies a fair, transparent, and consistent process when assigning contracts to the appropriate disciplinary units for research assessment. This process is used to determine the volume measure and does not affect other elements of the REF submission, e.g. to which UoA outputs will be returned.
<p>3. Summary of process</p> <p><i>NB. Full processes and related roles and responsibilities can be found in the CoP</i></p>	<p>The process sits within the University’s established processes for maintaining accurate HESA staff data. Initial allocation of contracts to UoA is based on departmental affiliation. Draft UoA allocations are then reviewed at departmental level and recommendations are made at this level wherever the disciplinary alignment is clear. If more than one contract is held by the same person, each contract is assessed independently and could be assigned to different UoAs.</p> <p>The University’s organisational units (whether school, faculty or department) generally align with REF UoA descriptors, meaning that in many cases the disciplinary area associated with a contract is clear. If organisational affiliation does not provide a clear match to a single UoA, for example where research spans multiple disciplinary areas, additional evidence will be considered.</p> <p>The evidence used to allocate contracts to UoAs is as follows:</p> <ul style="list-style-type: none"> • Departmental affiliation, which provides the primary indication of UoA fit • Affiliation with research group, centre or institute • Disciplinary area of research outputs • Disciplinary area of supervised students • Discussion with the researcher regarding which UoA best fits their research activity. • Primary funding sources • Relevant professional affiliations <p>The allocation of contracts to UoA is solely for the purpose of the REF volume measure, for this reason, the University does not issue individual notifications confirming which UoA a contract is assigned to, although staff can request this information for their contract(s). This data will only be available to those who need to confirm it for REF purposes.</p>
4. Is there a potential for a positive or negative impact on	No positive or negative impact. As contracts (not individual staff members) are assigned to UoAs based on the disciplinary alignment, there are no REF decision-making processes that could have a positive or negative impact.

Question	Response
people who have a protected characteristic?	
5. What are the other risks or potential unequal outcomes and how will these be mitigated?	<p>The approach of assigning contracts not individuals to UoAs aligns with the REF 2029 policy to decouple outputs from individuals. This removes the risk of potential unequal outcomes as there is no impact on an individual from this process.</p> <p>To mitigate any potential effects from unconscious bias in the decision making, the above process has been adapted so that the UoA decision is reviewed by the REF Submission Group (rather than an individual) and ultimate decision is made at REF Oversight Board.</p>

5.4 Selecting Outputs - Eligibility

Question	Response
1. Process name	Selecting Outputs - Eligibility
2. Purpose of process	The purpose of this process is to ensure that the research submitted by the University of Bath for assessment is representative, high-quality, and fairly selected.
<p>3. Summary of process</p> <p><i>NB. Full processes and related roles and responsibilities can be found in the CoP</i></p>	<p>The process covers:</p> <p>Identifying eligible outputs</p> <p>For an output to be eligible for the REF submission, it must be the product of research, must have been brought into the public domain during the allowed publication period, have a substantive link to the University, and meet the scope of the open access policy where applicable. Pure (the University’s research information management system and institutional repository) is used to identify outputs eligible for REF. All staff who publish research can, and are strongly encouraged to, add their outputs to Pure. Output eligibility will be checked and initial eligible output lists meeting provided for UoAs to review.</p> <p>Identifying substantive link to outputs</p> <p>The University identifies a substantive link between an output and the institution in line with the REF guidance. HR contract data is used to determine the timing and nature of the employment relationship. Outputs authored solely by teaching-only or other non-eligible contracts such as postgraduate research students, or visiting or honorary staff are not included. The University does not intend to use the ‘exceptional situations’ permission route to submit outputs solely authored by such staff. There is an exception for substantive link for long-form or extended process outputs published before the eligible employment relationship which we will consider as appropriate.</p> <p>Selecting outputs where the substantive link is via former staff</p> <p>To represent the full range of research undertaken within the REF period, outputs from former staff will be considered on the same basis as those authored by current staff, with the following additions to the policy and procedures for <i>outputs published after the staff member left</i>:</p> <ol style="list-style-type: none"> 1. If the staff member left due to compulsory redundancy, their output will not be eligible for submission. 2. If an output by former staff is published with a Bath affiliation, the Library will add it to Pure and the same eligibility checks as for outputs by current staff will be applied.

	<p>3. If outputs are published by former staff which may be eligible but do not have a Bath affiliation, RIS will liaise with the department to determine if a substantive link to institution can be confirmed. Consent will be sought from the author, and outputs without a Bath affiliation will not be submitted if consent is not obtained.</p> <p>Determining significant research contribution</p> <p>In line with the University’s guidelines on Authorship and acknowledgment in research outputs, the University expects that all individuals credited on the output as authors will have made a substantial or significant contribution to the output.</p>
<p>4. Is there a potential for a positive or negative impact on people who have a protected characteristic?</p>	<p>No positive or negative impact. As eligibility is based on the research produced not individuals, there are no REF decision-making processes that could have a positive or negative impact.</p>
<p>5. What are the other risks or potential unequal outcomes and how will these be mitigated?</p>	<p>There is a risk related to the interpretation of what is research as it can vary widely between disciplines and judgements could disfavour certain methodologies or approaches. This will be mitigated by ensuring that peer reviewers have the right expertise for the discipline.</p> <p>There is a risk that eligible outputs are missed if they are not recorded on PURE. To mitigate this targeted communication will be produced (emails/webpages/onwards dissemination) to encourage all outputs by all research-contributing staff, to be recorded on PURE. Support for using PURE is routinely available to all staff, including tailored assistance for colleagues with disabilities, ensuring that accessibility barriers are met and that the system itself does not present a barrier.</p> <p>For outputs relating to former staff without University of Bath affiliation there is a risk that there is a reason the academic has not linked the output to Bath which may cause potential conflict. To mitigate this risk consent to submit the output will be sought from the former staff member where necessary.</p>

5.4 Selecting Outputs – Assigning Outputs to UoAs

Question	Response
1. Process name	Selecting Outputs - Assigning Outputs to UoAs
2. Purpose of process	The purpose of this process is to ensure that the research submitted by the University of Bath for assessment is representative, high-quality, and fairly selected.
3. Summary of process <i>NB. Related roles and responsibilities can be found in the CoP</i>	Outputs will be assigned to UoAs based on disciplinary fit with the REF UoA descriptors. Initially, outputs will be reviewed within the UoA that best aligns with the internal author’s department. For staff based outside of the academic departments, output topic will be used to identify the appropriate UoA for review. We will review outputs in multiple UoAs as appropriate. Output fit and potential for cross-review in different UoAs will be checked at multiple points, including via requests to staff to self-identify UoAs for individual outputs, UoA Lead and Faculty reviews, or peer review. Outputs are decoupled from individuals, and whether the staff members with the substantive link have their contracts in the same UoA will have no bearing on the decision. The University will submit outputs to more than one UoA where this represents the excellence of interdisciplinary and collaborative research at the University.
4. Is there a potential for a positive or negative impact on people who have a protected characteristic?	No positive or negative impact. As eligibility is based on the research produced not individuals, and outputs and individuals are de-coupled, there are no REF decision-making processes that could have a positive or negative impact.
5. What are the other risks or potential unequal outcomes and how will these be mitigated?	<p>There is a risk that the process leads to UoA submissions not being representative of the research staff aligned to the UoA by contract.</p> <p>To mitigate this risk the protected characteristics of staff linked to outputs will be monitored and any significant variation with protected characteristics of staff linked to the UoA by contract.</p> <p>Adjustments to UoA submissions to ensure representativeness will be considered and decisions made by REF Oversight Board.</p>

5.4 Selecting Outputs – Assessing and Selecting Outputs: responsible research assessment practice

Question	Response
1. Process name	Selecting Outputs - Assessing and Selecting Outputs: responsible research assessment practice.
2. Purpose of process	The purpose of this process is to ensure that the research submitted by the University of Bath for assessment is representative, high-quality, and fairly selected in line with our responsible research assessment principles.
<p>3. Summary of process</p> <p><i>NB. Full processes and related roles and responsibilities can be found in the CoP</i></p>	<p>The Faculties and the School coordinate the review of outputs authored by academic and research staff within their departments. Where the volume of eligible outputs prevents a review of all outputs, individuals will be asked to self-nominate outputs for assessment. The purpose of the review process is to identify the strongest outputs to include in the University’s submission.</p> <p>Each output is assessed against the REF criteria of originality, significance and rigour. Expert review is the primary basis for assessment. Quantitative indicators are used only to inform judgements, and only where meaningful and appropriate indicators can be identified. Limitations inherent in quantitative data are explicitly acknowledged. Journal-based metrics, publication venue, format or language are not used as a surrogate measure of the quality or impact of outputs. Reviewers will apply criteria in ways that reflect disciplinary norms and expectations, using the most up-to-date REF panel guidance available.</p> <p>Each output is reviewed independently by a minimum of two reviewers on a 13-point scale to provide granularity against the REF star ratings. Where needed, external independent review will be sought. Scores are calibrated across outputs within each UoA to support consistency. Output selection will be based on assessments with the aim of submitting a portfolio that is both high-quality and representative of the research undertaken within each disciplinary area. UoA Leads will make selection decisions to support the strongest overall submission for their UoA.</p> <p>Output selection for each UoA will go through the following approvals process:</p> <ul style="list-style-type: none"> • UoA level selection by UoA Lead • REF Submission Group review and recommendation • REF Oversight approval and recommendation • University Executive Board sign-off
4. Is there a potential for a positive or negative impact on people who have a protected characteristic?	No positive or negative impact. As eligibility is based on the research produced not individuals, there are no REF decision-making processes that could have a positive or negative impact.

<p>5. What are the other risks or potential unequal outcomes and how will these be mitigated?</p>	<p>There is potential risk of bias (conscious and unconscious) within the peer review process, and a lack of representativeness. This will be mitigated by:</p> <ul style="list-style-type: none">• Ensuring representativeness of reviewers and panels are monitored.• The use of external reviews.• All reviewers will be required to complete online Responsible Research Assessment training. <p>The complete list of scored outputs will be analysed for protected characteristics and any significant difference indicating potential bias will be addressed.</p>
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5.4 Selecting Outputs – Diversity and Representativeness of Outputs

Question	Response
1. Process name	Selecting Outputs - Diversity and Representativeness of Outputs
2. Purpose of process	The purpose of this process is to ensure that the research submitted by the University of Bath for assessment is representative, high-quality, and fairly selected.
<p>3. Summary of process</p> <p><i>NB. Full processes and related roles and responsibilities can be found in the CoP</i></p>	<p>The University encourages the inclusion of diverse outputs, recognising differences in disciplinary research practices and methods for sharing within and beyond the profession. All output types can be recorded in Pure and guidance on how to do this will be published and actively promoted to staff to maximise the capture of such outputs. UoA Leads will be provided with reports on the range and proportion of output formats associated with their UoA. This will enable UoA Leads to consider whether the selected outputs reflect the norms and behaviours of their area, and to identify any potential under-representation of particular output types. These indicators are intended to inform judgement, rather than establish quotas.</p> <p>Eligible outputs can include a wide range of formats, such as:</p> <ul style="list-style-type: none"> • Journal articles, monographs, book chapters. • Creative works, performances, artefacts. • Software, datasets, translations, critical editions. • Policy reports, reviews, research syntheses. • Outputs in languages other than English (with abstract requirements). <p>The University will aim to maximise the quality of its REF submission while ensuring that the selected outputs are representative of the research within each UoA. Output quality will be the primary consideration and representativeness will be considered alongside.</p> <p>To ensure breadth and representativeness, the University does not intend to submit more than five outputs associated with a single substantive link within a UoA, except in exceptional circumstances, which would be explained in the Statement of Representation and included as part of the narrative submitted to REF. Selections will reflect the range of research and researchers within each disciplinary area.</p> <p>Staff whose outputs may be eligible, particularly staff from technical and professional services where research forms part of their duties and aligns with descriptors of UoAs to which the University will make a submission, will be encouraged via direct communications to propose their outputs through Pure according to guidance provided.</p>

<p>4. Is there a potential for a positive or negative impact on people who have a protected characteristic?</p>	<p>No positive or negative impact. As eligibility is based on the research produced not individuals, there are no REF decision-making processes that could have a positive or negative impact.</p>
<p>5. What are the other risks or potential unequal outcomes and how will these be mitigated?</p>	<p>Potential risk due to bias (conscious and unconscious) and representativeness of peer reviewers and review panels. This is mitigated by monitoring representativeness of reviewers and panels.</p> <p>RIS and the Library are currently investigating how various data sources can help us understand and analyse representativeness, and the CoP will be updated following the publication of REF panel guidance in this area. As outlined in the CoP, UoA leads will draw on their own understanding of the disciplinary landscape, and together with reports provided by RIS will consider whether the selected set of outputs reflects the range and scale of research activity.</p>

5.5 Managing appeals processes and review mechanisms

Question	Response
1. Process name	Managing appeals processes and review mechanisms
2. Purpose of process	To ensure that staff have routes through which they can raise concerns related to research independence
3. Summary of process <i>NB. Full processes and related roles and responsibilities can be found in the CoP</i>	<p>Since decisions on how individual contracts are categorised for the REF volume measure do not affect a member of staff's role, career progression, or ability to contribute to the REF submission, there is no separate appeals process. The CoP documents the independent established procedures and appeals that exist in relation to academic appointments and progression and provides a route to raise concerns if a member of staff believes that the CoP has not been followed.</p> <p>More generally, if anyone has concerns that practices at the University of Bath are not aligning with the CoP during implementation, they should contact the Deputy Vice-Chancellor and Provost, as Chair of the University's Equity, Diversity and Inclusion Committee (deputy-vc@bath.ac.uk). The Deputy Vice-Chancellor and Provost will maintain confidentiality regarding the concern, consult with the persons responsible for the process, and provide an initial response to the individual within 20 working days. Any necessary actions or adjustments required will be communicated to the Pro-Vice-Chancellor (Research).</p>
4. Is there a potential for a positive or negative impact on people who have a protected characteristic?	No positive or negative impact. Any member of staff will be able to raise a concern through the process described and the CoP has been widely circulated as described in part 3 of this document.
5. What are the other risks or potential unequal outcomes and how will these be mitigated?	<p>There is a risk that concerns raised may highlight a negative impact that has not yet been considered and needs to be addressed. The number and nature of concerns will be examined alongside the methods used to resolve them, and although numbers may be small we will monitor for any emerging patterns in who raises concerns.</p> <p>Individuals may not raise concerns due to confidentiality concerns or the seniority of the Deputy Vice Provost. We will mitigate this by making available a Microsoft Form as an alternative to email.</p>

6. Overall Equality Impact Assessment of the Code of Practice

6.1 Arrangements for monitoring and reviewing the actual impact of the Code of Practice

Where potential impact for processes above have been identified the following actions have been allocated:

- The process has been updated to mitigate the impact identified
- Data relating to the process will be monitored to assess impact as per section 6.2. And where data analysis indicates actual impact, processes will be updated to mitigate this risk

6.2 Impact on People Protected Characteristics

The table below provides an overview of the positive or negative impacts the Code of Practice could have on people with protected characteristics, and where that impact may be negative, how this will be addressed. This will be reviewed again when quantitative data from proposed analyses described above is available.

Protected Characteristic	Is there a potential for positive or negative impact?	Please explain and give examples of any evidence/data used	Action to address negative impact (e.g. adjustment to the policy)
Disability	No		
Gender reassignment	No		
Marriage or civil partnership	No		
Pregnancy or maternity	No		
Race (including colour, nationality, ethnic or national origin)	No		
Religion or belief	No		
Sexual orientation	No		
Sex (gender)	No		
Age	No		

6.3 Other Potential Impacts

Part time working will be reviewed with respect to the identification of Research Independence.

6.4 Final Decision

The table below provides an overview of the positive or negative impacts the Code of Practice could have overall on people with protected characteristics, and where there is a possible negative impact, how this will be addressed.

Final Decision	Tick the relevant box	Include any explanation/ justification required
1. No barriers identified therefore activity will proceed .	X	Monitoring is in place to mitigate risks for certain processes. Where data analysis shows a negative impact then the process will be reviewed and updated to mitigate.
2. You can decide to stop the policy at some point because data shows bias towards one or more groups		
3. You can adapt or change the policy in a way which you think will eliminate the bias		
4. Barriers and impact identified, however having considered all available options carefully, there appear to be no other proportionate ways to achieve the aim of the policy. Therefore, you are going to proceed with caution with this policy knowing it may favour some people less than others, providing justification for this decision.		

Will this EIA be published?	Yes
Date completed	
Review date	At least annually – next review after approval of this version is Summer 2027.

6.5 Change Log

Name	Date	Version	Change
Jane Hallett	16 Feb 2026	V1.3	Draft revised to incorporate internal feedback.
Jane Hallett	20 Feb 2026	V2.0	Draft finalised for all-staff consultation.

7. Data Analysis

7.1 Availability of Data

The impact of REF processes at the University of Bath on protected characteristics will be kept under review. This will include data analysis where sufficient data is available at an institution-wide level. Some data is only available where voluntarily declared by staff in our HR system.

The table below provides an overview of data availability by protected characteristic.

Protected characteristic	Data Availability
Age	Full data-set available
Disability	Data available for over 90% of population; return large enough for meaningful analysis
Ethnicity (Race)	Ethnicity used for analysis. Data available for over 90% of population; return large enough for meaningful analysis
Gender (Sex)	Full data-set available
Gender reassignment	No data available
Marriage and civil partnership	Data available for less than 10% of the population; return too small for meaningful analysis
Pregnancy and maternity	Full data-set available
Religion or belief	Data available for less than 65% of the population; return too small for meaningful analysis
Sexual orientation	Data available for less than 65% of the population; return too small for meaningful analysis

7.2 Data Monitoring

Any data analysis and data representation will follow our internal rounding principles to ensure that no individual can be identified from the results. It is likely that our numbers for some characteristics will be very small and, in some instances, skew the results. We will redact any sensitive information and small numbers from any publications.

The table below shows the details of data monitoring activity relating to REF processes above identified as requiring data monitoring.

Process	Data Monitoring Required	Frequency/Dates
Identifying Staff with Significant Responsibility for Research (SRR)	Number of staff on <i>research and teaching</i> contracts that move to a different contract type, broken down where possible by protected characteristic. Rate of movement between job families.	Annually First review of data in 2026: Compare HESA Pilot year data and HESA Return 2026.
Identifying Staff with Research Independence (RI)	Profile of research only staff considered research independent vs not research independent.	Annually First review of data in 2026: HESA Pilot year data

	<p>Promotions each year for re-research staff (Grade 7 to Grade 8) and look at trends in numbers and profile.</p> <p>Focus on protected characteristics and part-time working.</p>	
Selecting Outputs – assigning outputs to UoAs	Staff linked to outputs will be monitored and any significant variation with protected characteristics of staff linked to the UoA by contract.	Annually from 2027 onwards
Selecting Outputs – assessing and selecting outputs	The complete list of scored outputs will be analysed for protected characteristics and any significant difference indicating potential bias will be addressed.	Annually from 2027 onwards
Appeals Process	The number of and type of appeals will be reviewed and methods of resolution along with monitoring for any emerging patterns in who raises concerns.	Bi-annually

7.3 Future iterations

This EIA iteration is a qualitative review that has facilitated our consideration of equality issues whilst developing policy and processes. Future iterations will provide review and data analysis at the point of decision making, as well as any substantive changes proposed to the CoP. The EIA will be reviewed at least annually.