



## **London Metropolitan University Code of Practice for REF 2021**

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## Part 1: Introduction

1. Each university intending to submit to the Research Excellence Framework (REF) 2021 is required to produce a Code of Practice (CoP) to ensure, fair, equitable and transparent processes for identifying staff, outputs and Units of Assessment for submission. This CoP is intended to ensure that London Metropolitan University (London Met) is fair and equitable in its identification of staff and their outputs for submission to the Research Excellence Framework (REF2021).
2. The London Met CoP has been written to address the requirement of the UK research funding bodies for Universities wishing to submit their research for assessment as part of REF 2021 to submit a Code of Practice in June 2019 for examination by the REF 2021 Equality and Diversity Advisory Panel (EDAP). The CoP has been re-written in response to comments from EDAP and was re-submitted in September 2019.
3. The CoP provides a summary of the university's current position in relation to the development of a final REF submission.
4. The CoP comprises four parts. Following this introduction, the Code of Practice contains further parts describing the university's policies for making a submission to REF 2021 with regard to:
  - The university's commitment to Equality, Diversity and Inclusion (part 1)
  - The fair and transparent identification of staff with significant responsibility for research (part 2)
  - The determination of who is an independent researcher (part 3)
  - The selection of outputs (part 4)
5. This revised Code of Practice and the policies and processes it describes has been communicated to all staff as described in the communication plan in Annex B.
6. The Vice-Chancellor, Senior Leadership Team, Director of HR and officers from the University and College Union (UCU) have also reviewed the document during the process.
7. The REF 2021 Equality and Diversity Advisory Panel will examine the Codes of Practice submitted by Universities and advise the funding bodies on their adherence to the guidance, prior to approval and publication. All submitted and approved codes of practice will be published before the REF 2021 submission deadline, postponed to 31<sup>st</sup> March 2021.
8. The university will oversee the identification of staff and units at the institutional level, although the individual views and needs of Schools will be accounted for through UoA Panels, which will make recommendations, and via academic representation on the REF Advisory Panel. The university fully recognises that research is not the only route to excellence and supports workload allowances and promotion via Learning and Teaching and Enterprise routes. Our university also blends practice and non-practice and has Units of Assessment which cross Schools. The REF Advisory Panel is alive to the challenges, requirements and possibilities created by these circumstances. We do not view non-submission in the REF to be deleterious to careers in a university which values these other routes too.

Further information on our policies and strategies are available to university staff on our website and the university's Equality and Diversity policy is appended to this CoP in Annex A.

## **1.2 London Met's policies on Equality and Diversity: Context**

9. The university is committed to providing a research and learning community in which the rights and dignity of all individuals are respected, and which is free from unlawful discrimination, harassment and victimisation.
10. Our current Strategic Plan (covering 2015-2020) sets out five headline values of: integrity; excellence; service; collaboration and teamwork and; effective citizenship which guide our behaviour and actions. Our effective citizenship values include promoting social justice and celebrating diversity. The VC has written a new Strategic Plan for the University which has been consulted on with staff, agreed by the Board of Governors and will be launched in October 2019.
11. The university's policies ensure that the university complies with The Equality Act 2010. The university's policies are designed to remove barriers to equality, celebrate diversity and promote inclusion. We also promote a diverse workforce with good work-life balance. All our policies are developed in consultation with our staff and trade unions, are kept under review and are published on our Employee Support web pages.

### *Equality and Diversity Policy (Annex A)*

12. This policy sets out our headline commitment to equality and diversity and sets out individual staff responsibilities and our clear and well-established commitment at all levels to support equality and diversity.
13. It sets out how we intend to meet our equality commitments in respect of staff and students, encompassing the general equality duties in respect of the protected characteristics listed in the Equality Act 2010. The legislation, and the university, seeks to protect against discrimination on the grounds of Age, Disability; Gender reassignment; Marriage and civil partnership; Pregnancy and maternity; Race; Religion or belief; Sex; Sexual orientation
14. The Equality Act 2010 places a general duty on public bodies, including higher education institutions, to: advance equality of opportunity; foster good relations between people of different protected characteristics (including racial groups); and eliminate unlawful discrimination.
15. The university has an online interactive multi-media course called Equality and Diversity Essentials, which provides staff with flexible access to learning materials at a time and place that suits them. The course provides an overview of the main equality legislation and its practical implications, setting the scene in terms of London Met's expectations of staff.

### *Single Equality Scheme*

16. We have chosen to continue to drive forward our diversity and equality aims and meet our obligations with the help of our Single Equality Scheme, which was initially developed in 2015 in consultation with staff and trade unions.

### *Disability Confident Committed*

17. As a Disability Confident Committed Employer, the university has committed to:
- ensuring our recruitment process is inclusive and accessible
  - communicating and promoting vacancies
  - offering an interview to disabled people
  - anticipating and providing reasonable adjustments as required
  - supporting any existing employee who acquires a disability or long-term health condition, enabling them to stay in work

### *Living Wage*

18. We are an accredited London Living Wage employer, committed to paying our staff, many of whom are our own students seeking part time work to support themselves during their studies, at least the London Living Wage.

19. We also have a number of policies designed to support the work life balance:

- Flexible working policy
- Maternity policy
- Adoption policy
- Paternity leave policy
- Paternal leave policy
- Special leave policy

### *Gender Pay Gap*

20. Our gender pay gap is better than the HE sector average and is improving. We will continue to drive it down further through planned actions.

21. Our mean gender pay gap is 7.0%, which is 1.6% less than last year. We have examined our data to understand why this is and how we can seek to continue to reduce this gap.

22. We maintain equal pay through a range of measures:

- We ensure equal pay by evaluating roles and responsibilities, not people, to determine pay grades.
- We have clear published salary scales for all staff grades.
- We have clear published progression and internal recruitment opportunities for our staff, with identification based on objective criteria assessed by a representative panel.
- We have a published fair recruitment and identification policy, supported by training incorporating unconscious bias training.
- We are an accredited living wage employer and ensure all our staff and in particular our lower paid staff earn at least the London living wage.
- We have a clearly stated and embedded commitment to promoting accessibility and equality of opportunity and we are openly proud of our diverse community.

### *Malpractice policy*

23. The university aims to promote a culture of openness and a shared sense of integrity, by inviting all employees and students to act responsibly in order to uphold the reputation of the university and maintain public confidence.

### 1.3 Recent Developments in Equality, Diversity and Inclusion

24. Our new Vice Chancellor, Professor Lynn Dobbs has a strong personal commitment to equality and diversity which has led to the initiation of a review of all policies relating to equality and diversity. A new senior post, Associate Pro Vice-Chancellor (APVC) for Attainment, Equity and Inclusion, has been created. A number of new initiatives are building on our existing commitment to equality, diversity and inclusion, and the university has also begun to engage with a number of organisations advancing equality and diversity in the university sector. The university's first LGBT+ group was founded in early 2019 and we are now a member of Stonewall's Diversity Champions programme. The university has also commenced the process of registering with Athena SWAN and the Race Equality Charter, self-assessment teams are being established and data collection to support submissions is underway. The Board of Governors has agreed to a number of key performance indicators around equality, diversity and inclusion which will ensure that these new initiatives are supported at every level and continue to develop.
25. London Met is funding 10 places on the Advance HE Aurora Programme for 2019-20. The Aurora Programme has been designed to encourage women in academic and professional roles to think about themselves as leaders, to develop leadership skills and to help institutions maximise the potential of these women.

#### *Research Management*

26. The university's new Senior Leadership Team, in place since early 2019, includes a new Pro Vice-Chancellor for Research and Knowledge Exchange supported by a new Head of Research Policy and Implementation who leads a new Research and Postgraduate Office that has been established to provide a centralized support infrastructure for the management of research and support of staff and research students. This new team will also run, from September 2019, training for staff to encourage and support career development pathways.
27. Over the summer of 2019, we ran a centrally-led research-planning exercise that has enabled the allocation of research time in workloads against formal scheduled teaching. At the heart of this was a request to staff to present their research outputs for consideration for external review. Research Leads and Heads of School, as subject specialists, then determined which outputs should be reviewed. Once we had determined centrally whether in scope outputs were also REF compliant, we sought external advice. This exercise also enabled us to determine which Units of Assessment might be viable for submission.

The allocation of research workloads was based on the promise shown by staff through their research outputs of their ability to conduct high quality research should they be allocated time to so do. Staff who showed this promise were written to in early September advising them of their workload allowances for research for the academic year 2019-20, i.e. 100 hours from Formal Scheduled Teaching [FST]. A notional 30 hours was also allocated to those staff who through their research outputs demonstrated that with the right level of support and training they too could be developed to conduct high quality research in time. Professors and Readers were only excluded from this process if they held significant management roles. In so doing, we have ensured allocations are systematically applied across all staff, with an equitable distribution of work. There is a particular focus on the allocation of research time and research leave to ensure equity across the university. Furthermore, we opened an Appeals Process described in Section 2.4 against workload decisions. We also asked staff to inform the Research and

Postgraduate Office about any new research outputs. At this point, these decisions do not equate to inclusion in the REF.

28. The university has developed an annual promotion procedure designed to enable academic and research staff to apply for promotion to the title of Reader or Professor.

The title of Reader may be conferred on an existing member of staff where they have shown distinction in original research which has had demonstrable national and international impact. The member of staff would evidence a significant and continued contribution to the management and delivery of research within the university.

The university's promotion policy also supports academic staff who have distinguished themselves in their Teaching and/or Professional Practice. The title of Associate Teaching Professor may be conferred on an existing member of staff with outstanding achievements in learning and pedagogy, for example in the National Teaching Fellowship Awards, and/or in knowledge exchange activities and enterprise.

The title of Professor may be conferred on an existing member of staff, where they have demonstrated a substantial and outstanding record of achievement and leadership comparable with that expected of an external candidate for a Professorship.

29. The university seeks to have an environment that supports fixed-term and part-time staff, including contract research staff, to ensure fairness and a lack of discrimination in relation to equality and diversity.

#### **1.4 Transparency, Consistency, Accountability and Inclusivity**

30. The CoP demonstrates the university's commitment to the REF 2021 principles of transparency, consistency, accountability and inclusivity and which are detailed in subsequent parts of this document:

- **Transparency** – We have developed policies for the identification of Category A eligible staff, as defined by REF 2021 who are independent researchers according to the REF 2021 criteria. We have also developed a policy for the selection of outputs for submission in each Unit of Assessment. The communication plan attached in Annex B describes how these policies will continue to be and have been shared with staff. The procedures and processes for identification of staff, determination of research independence and output selection are described in Parts 2, 3 and 4 of this Code of Practice.
- **Consistency** – These policies will be applied consistently for individual researchers and across the Units of Assessments. The REF Advisory Panel will ensure that the CoP is equitably, inclusively and evenly applied. The REF Advisory Panel will be supported by the Research Leads from each School, the UoA Panel Chairs and the Research and Postgraduate Office in ensuring that the processes are adhered to consistently.
- **Accountability** – Collective and individual responsibilities and roles of groups and/or panels involved in REF 2021 decision making processes have been described and illustrated in the relevant Annexes along with their Terms of Reference. Members of these groups and/or panels are required to receive bespoke Equality and Diversity training as described in Annex J with a focus on the REF 2021 identification process.

- **Inclusivity** – Our policies and processes for identification of staff and selection of outputs have been developed to foster an inclusive and positive environment and to ensure a fair representation of staff. Staff have been asked to select their first choice UoA for submission, and, where appropriate, their second and third choices. These policies will apply equally to all staff whether full-time, part time or on short term contracts.

31. The university provides data protection guidance for staff and privacy notices for staff and students about how we handle their data, see Annex R.

## **1.5 Communication Plan**

32. The Code of Practice has been the subject of consultation with the Vice-Chancellor, Senior Leadership Team (SLT), Director of HR, Heads of School, Research Leads, staff and officers from the University and College Union (UCU) during its development.

33. Schools were also invited to make local arrangements for presentation of the Code of Practice in person.

34. A communication plan was written, see Annex B, to ensure the widest possible dissemination of the Code of Practice submitted to EDAP.

35. Our guiding principles for this communication plan are to support and amplify the core ethos of our Code of Practice by being transparent, consistent, accountable and inclusive.

36. The plan takes a multimedia approach and includes in person events, text and video to ensure maximum reach and in a format that it is accessible for all staff

37. The revised Code of Practice will be shared following submission using bespoke REF emails with key dates, deadlines and updates for academic staff including those who are absent from the university but still in contract. All new academic staff joining the university after publication of the COP will receive a copy as part of their induction.

38. Draft(s) and submitted versions of the document have been/will be shared in Microsoft Word to enable staff to use the appropriate enabling software provided by the university. Staff can also request other accessible formats.

39. A dedicated REF email account has been set up for staff comments:  
[REF2021@londonmet.ac.uk](mailto:REF2021@londonmet.ac.uk)

40. The final Code of Practice will be available on the university's intranet (Staff Zone) and public facing website. The intranet will also contain FAQs relating to REF and contact details.

## **Part 2: Staff Identification**

### **2.1 Policies and Procedures**

41. Institutions not submitting 100 per cent of Category A eligible staff are required to include in their Code of Practice the criteria and processes, agreed with staff, for identifying staff with significant responsibility for research (SRR). Category A eligible staff are defined by REF 2021 as "academic staff with a contract of employment of 0.2 FTE or greater, on



the payroll of the submitting institution on the census date, whose primary employment function is to undertake either 'research only' or 'teaching and research'.

We will submit 100% of our Category A eligible staff who have significant responsibility for research to REF 2021.

Staff on research only contracts will need to meet the definition of independent researcher as described in Part 3 to be identified as Category A eligible.

The university also employs a number of staff on teaching only contracts and, as research is not a requirement of such posts, they will not be considered Category A eligible.

42. REF 2021 defines staff with significant responsibility for research (SRR) as "those for whom explicit time and resources are made available to engage actively in independent research, and that is an expectation of their job role." In terms of identifying Category A eligible staff who have a significant responsibility for research (SRR) it should be noted that the university had allocated no time allowances for research to staff on non-research only contracts except for Professors with external research income and these staff were given no expectations of research in the current assessment period prior to academic year 2019-20 and were only workloaded for teaching and administration. The new university strategy is therefore explicitly to support staff research across the university, and not just in designated categories, for the first time in four years. We are committed to trebling the number of staff who are supported in workloads to conduct their own independent research.
  
43. For 2019-20 and following the research planning exercise described in Section 1.3 across the university, which was designed to inform the blend of Units of Assessment that we will submit to, we have offered research workload allocations to those staff who wish to have them, based on their expectations, plans, and promise (relative to career stage).
  
44. We have divided staff on teaching and research contracts into three categories: i) those eligible for 100 hours of research in academic year 2019-20, given that they show promise to conduct high quality research and/or to generate external funding; ii) those eligible for a 30 hour research development allocation because they show potential and desire to conduct high quality research; iii) those who have yet to show promise of research at this level but who wish to avail of the mentoring programme and researcher developer training that we are implementing for 2019-20 supported by a new Research and Postgraduate Office which was established in autumn 2019. These research workload allocations have been applied equally to all staff on teaching and research contracts whether on a fixed term, part time or full-time permanent basis. Additionally, we shall allocate time to all Early Career Researchers and ensure that they are supported in their career development.  
We will give all new staff who join us on a teaching and research contract a workload allowance to engage in their own independent research.
  
45. Category A submitted staff are defined as Category A eligible staff who have been identified as having significant responsibility for research on the census date of 31<sup>st</sup> July 2020.

Category A submitted staff also includes all staff on research-only contracts who are Category A eligible.

Staff on research-only contracts will only meet the Category A eligibility criteria if they also meet the criteria for eligibility as independent researchers described in Part 3.

46. The stages of staff identification and approval are shown in a diagram in Annex L.

We will identify staff who have significant responsibility for research from the staff who have been allocated research workloads for 2019-20 and all Professors and Readers.

The process will also consider the impact of significant management responsibilities on Professors' and Readers' available time for independent research. See Annex K.

Staff identified through this process as having significant responsibility for research will therefore become Category A submitted providing they are in employment with us on 31<sup>st</sup> July 2020 on a minimum 0.2FTE contract.

## **2.2 Development of processes**

47. Consultation with staff and staff representative bodies representing academic staff employed at London Metropolitan University on the processes to be adopted for identification of staff with significant responsibility for research were conducted through meetings between staff, and between staff representative bodies and senior staff from Human Resources.

48. In early Autumn 2019, following the process of allocating workloads for research which is described in Section 2.1, the Principal Human Resources Adviser for Employee Relations e-mailed the staff representative bodies with details of the process for identifying staff with significant responsibility for research.

Confirmation that agreement has been received from the staff representative bodies for the process of identifying staff with significant responsibility for research has been appended in a letter from the Vice Chancellor dated 19<sup>th</sup> September 2019.

49. Those staff who were allocated research workloads were written to formally, using hard copy letter, in September 2019 by the Pro Vice-Chancellor for Research and Knowledge Exchange advising them of their workload allocation for research and the methodology behind the allocation. They were also advised of their right to appeal and provided with an appeal form with a deadline for receipt of appeals by 30<sup>th</sup> September 2019.

All other academic staff were written to separately describing the research-planning exercise, outlining the process of research workload allocations and introducing the mentoring programme and researcher developer training for 2019-20.

50. The appeals will be determined by the Research Excellence Framework Equality, Diversity and Inclusion Panel (REFEDIP) described in Section 2.3.  
The panel will determine the outcome of the appeal within one month of receipt and staff will be written to formally advising them of the outcome and providing feedback.  
The process for further appeal is described in Section 3.3 and illustrated in Annex E.
51. Details of the workload allocations and the university's plans to support staff and to increase research activity were presented at all staff Town Hall meetings in September 2019.

52. The stages of staff identification and approval are shown in a diagram in Annex L.
53. The communication plan describing the consultation process for other staff representative groups, senior leadership, and management is attached in Annex B.

### **2.3 Staff, committees and training**

54. In accordance with the principle of accountability, the Code of Practice:
  - Identifies who will be involved in the identification process and identifies what training those staff will have undertaken.
  - Describes the operating criteria and terms of reference for individuals, panels, working groups and any other bodies concerned with staff identification.
55. The Board of Governors is the supreme authority within the university.  
The Board appoints the Vice-Chancellor (VC) and other senior officers of the university including those such as the Deputy Vice-Chancellor, Pro Vice-Chancellors, Associate Pro Vice-Chancellors and the Director of Human Resources who will be involved in decision making processes in relation to the university's REF 2021 submission.

The Vice-Chancellor is an ex-officio member of the Board.

The Vice-Chancellor:

- Appoints the chair of the REF Advisory Panel
- Appoints the chair of the Research Excellence Framework Equality, Diversity and Inclusion Panel (REFEDIP)
- Appoints the Appeals Panel
- Approves the university's final REF submission

An organogram illustrating the university's governance and its committee structure is appended in Annex C.

56. The VC has devolved responsibility for the preparation of the university's REF submission to the REF Advisory Panel. The REF Advisory Panel is chaired by the Pro Vice-Chancellor for Research and Knowledge Exchange and includes the Head of Research Policy and Implementation along with three Professors from across the university. Members of the REF Advisory Panel will be appointed on the basis of their seniority and relevant research experience. The appointment process will be overseen by the Deputy Vice-Chancellor (DVC) and the Director of Human Resources (HR) to ensure that principles of equality, diversity and inclusion are adhered to. Administrative support will be provided for the REF Advisory Panel by the Research and Postgraduate Office to ensure that clear records of all decision making are made and maintained.
  - The REF Advisory Panel will advise the Vice-Chancellor on the final REF 2021 submission.
  - The Terms of Reference (TOR) and membership for the REF Advisory Panel can be found in Annex F.
  - In making its decisions, The REF Advisory Panel will be advised by, and will consult with, panels constituted from senior academics in each UoA.
57. The PVC Research and Knowledge Exchange will appoint the UoA Panels in consultation with the heads of the university's six academic Schools. The appointment process will

take due consideration of the principles of equality, diversity and inclusion and will be overseen by a senior member of staff from the HR department. Administrative support for the UoA Panels will be provided by the university's academic business administration team to ensure that clear records of the identification, research independence determination and output selection processes are made and maintained.

The terms of reference and membership of the UoA Panels can be found in Annex G.

58. The REF Advisory Panel and UoA Panels will be supported by the Research Excellence Framework Equality, Diversity and Inclusion Panel (REFEDIP) to ensure that equality, diversity and inclusion issues are fully and properly addressed during the preparation and finalisation of our REF submission.

The REFEDIP will be appointed by the Vice-Chancellor and the appointment process will be overseen by the Deputy Vice-Chancellor and Director of HR to ensure that principles of equality, diversity and inclusion are adhered to.

The REFEDIP will:

- Receive and decide the outcomes of declarations of individual circumstances from staff.
- Receive and review written complaints from colleagues regarding any aspect of the operation of the REF process for decision for forwarding to the REF Advisory Panel, Appeals Panel, SLT, or other university body or group for decision.
- The REFEDIP and its members are independent of any REF decision making or identification processes.
- The Terms of Reference (TOR) and membership of the REFEDIP can be found in Annex H.

59. A diagram showing the REF 2021 decision making processes and the roles of senior members of the university and panels in these processes is attached in Annex D.

60. Members of the REF Advisory Panel, UoA Panels, REFEDIP, Appeals Panel, and all senior staff involved in the appointment of panels and in the determination of research independence, complaints, appeals and declaration of individual circumstances will be required to attend bespoke on campus training on Equality, Diversity and Inclusion to ensure that the process is conducted in a way that is fair to all staff and free of bias (conscious and unconscious). This bespoke training is described in Annex J and will be supplemented by online training.

The training will include:

- An overview of REF and EDI
- EDI and our Code of Practice
- Bias and unconscious bias
- Determination of research independence and selection of outputs
- Declaration of individual circumstances and reduction in outputs
- Equality Impact Assessments

All new members of staff who will be involved in the REF process will also be required to undergo training soon after joining the university and before they engage in any of the REF processes.

61. All on-campus training will be developed and delivered by staff from the university's Centre for Professional and Educational Development (CPED). The Research and Postgraduate Office will support staff from CPED to ensure that the training takes account

of REF specific material already available from Advance HE and from the REF 2021 website.

62. All staff involved in REF preparations and decision making will also be signposted to Advance HE webinars on equality, diversity and inclusion and REF 2021 webinars on Codes of Practice.

They will also be required to take the university's online interactive multi-media course called Equality and Diversity Essentials, described in Section 1, as well as our online course on Data Protection Essentials.

63. The Research and Postgraduate Office staff will be responsible for ensuring that the REF Advisory Panel has the information required to determine the REF submission but they will not be party to any decision making, identification of staff, determination of research independence, complaints, appeals and declaration of individual circumstances. The Research and Postgraduate Office will be responsible for co-ordinating the information for the REF submission and supporting the technical aspect of the uploading process.

Research and Postgraduate Office staff will also be required to attend the Equality, Diversity and Inclusion training described in Annex J.

## **2.4 Appeals**

64. All individuals affected by decisions at any stage of the REF process as to their exclusion or inclusion from the REF submission, will be advised of their right of appeal and process of appealing that decision.

65. When decisions are made on staff with significant responsibility for research, determination of research independence and on individual circumstances staff may appeal them. Appeals will be made, using the Appeals Form template in Annex O, to the PVC Research and Knowledge Exchange, who will collate them. An Appeals panel chaired by the Deputy Vice-Chancellor (DVC) and comprising the Associate Pro Vice-Chancellor (APVC) for Attainment, Equity and Inclusion and the Head of the Centre for Professional and Educational Development will consider the appeals. The terms of reference for the Appeals Panel can be found in Annex I. The panel will determine the outcome of the appeal within one month of receipt. If a staff member has their appeal rejected, they may request a meeting with the Vice-Chancellor and Director of HR. Their determination will be final.

Grounds for appeal include:

- Identification of staff with significant responsibility with research was not carried out in accordance with the university's REF 2021 Code of Practice
- Identification of staff as not Research Independent
- Declaration of individual staff circumstances has not been considered or decided on in accordance with the university's REF 2021 Code of Practice
- Selection of outputs has not been carried out in accordance with the university's REF 2021 Code of Practice

The timeline for appeals and the role of panels in determining appeals is illustrated in Annex E.

66. The appeals processes will also be shared with staff as described in the communication plan in Annex B and will be available on the Staff Zone of the intranet until the closing date for submissions of 31<sup>st</sup> March 2021.

## 2.5 Equality Impact Assessment

67. Before drafting the Code of Practice, the university conducted an initial Equality Impact Assessment (EIA), attached in Annex Q, to consider and understand the implications for equality of the process of identification of staff for inclusion in the REF submission.
68. We will undertake a continuing process of Equality Impact Assessment (EIA) throughout the REF process. The EIA(s) will be conducted by the Director of Human Resources in consultation with the Head of Research Policy and Implementation.

The EIA(s) will determine whether the processes for identifying staff, determining research independence and output selection may have a differential impact on particular groups with reference to the protected characteristics listed in the Equality Act 2010.

The findings from the EIA(s) will be used to inform the REF process to ensure that the staff identification policy for the REF does not have a differential impact on protected groups. This work will also be conducted by REFEDIP.

The EIA(s) should enable the university to clearly identify where discrimination may have occurred and to take appropriate action. Should the EIA(s) identify where a particular policy or procedure has had a positive impact the university may choose to apply such policy or procedure to other aspects of our REF preparation and submission.

69. The EIA will be reviewed at key stages:
- When consulting on the draft CoP
  - When finalising the policies and procedures for identifying staff with a significant responsibility for research, determining research independence, consideration of appeals and selection of outputs.
  - When identifying staff with a significant responsibility for research
  - When determining research independence
  - When considering appeals against identification of staff who do not have SRR or who are not identified as independent researchers
  - When selecting outputs for submission  
When preparing the final submission
70. Consideration will be given to the combined impact on equality of policies and procedures relating to staff who are identified as having significant responsibility for research and are considered independent researchers.
71. We have so far consulted staff representative bodies on the policies and procedures for the identification of staff with significant responsibility for research with the aim of utilising an agreed process.  
We did not identify any changes to the policies and procedures through this consultation process.  
We reviewed the results of applying the policies and procedures and shared the results of that analysis with the PVC (Research), Research Office staff and with research leads in Schools to raise awareness and help avoid unconscious bias.

72. A further analysis of staff who have been allocated 100 hours off FST for 2019-20 and comparison against the profile of the full academic staff group revealed 9% lower representation in the age group 26 to 50 with age groups 51 to 65 and over 65 both having higher representation (of 2% and 4%). This has resulted in a decision to review those who have been given the smaller workload allocation to see if there is potential for a positive impact on those who are under represented.
73. The EIA to be carried out at the time of output selection will take account of the processes that are being used to evaluate the relative quality of the outputs in the pool such as peer review, external evaluation and citation data. The processes for assessing the selected outputs in relation to the protected characteristics of the staff being returned are described in Section 4.1.
74. The results of the EIA(s) will be reported to REFEDIP. The evaluation of the EIA (including the initial stage) will be published (and made available on the Staff Zone of the university's intranet after the REF submission, and will include any mitigating actions taken.

### **Part 3: Determining research independence**

#### **3.1 Policies and Procedures**

75. The university will use the REF 2021 definition of an independent researcher, i.e. "an individual who undertakes self-directed research, rather than carrying out another individual's research programme." All submitted Category A staff will need to meet this definition.
76. The assessment as to whether or not an individual is an independent researcher will be informed by their role in their research work and based on indicators provided by the REF 2021 panels which include:
- "leading or acting as principal investigator or equivalent on an externally funded research project"
  - "holding an independently won, competitively awarded fellowship where research independence is a requirement"
  - "leading a research group or a substantial or specialised work package"
- For a member of staff to be identified as an independent researcher they must have demonstrable evidence and a track record in more than one of these indicators.
77. Staff on research-only contracts must be independent researchers and have a contract of employment of a minimum of 0.2FTE on 31<sup>st</sup> July 2020 to be submitted to REF.

We will not seek to determine research independence of staff on teaching and research contracts, as the allocation of research workloads is for the purposes of independent research, or Professors and Readers. The nature of these contracts is such that any research staff engage in will be independent.

78. Following the draft final decision at the end of September 2019 on which Units of Assessment the university will submit to, the UoA Panels will decide which members of staff will be returned with each Unit.
79. The process of determining research independence, as illustrated in Annex K, will be carried out by the REF Advisory Panel, in consultation with the Unit of Assessment Leads, during October 2019.

80. Staff will be contacted individually at the start of November 2019 and advised of the outcome and provided with written feedback as to why a decision was made that they did not meet the definition of an independent researcher.

Staff will be advised at that stage of their right to appeal.

The appeals will be determined by the Research Excellence Framework Equality, Diversity and Inclusion Panel (REFEDIP) described in Section 2.3.

The deadline for receipt of appeals against the determination of research independence will be the end of November 2019.

REFEDIP will determine the outcome of the appeal within one month of receipt.

The process for further appeal to the Appeals Panel is described in Section 2.4 and illustrated in Annex E.

81. It will be made clear to staff who have not been identified as being independent researchers that this assessment is not based on any appraisal of their performance.

### **3.2 Staff, Panels and Training**

82. The operating criteria and terms of reference for individuals, panels, working groups and any other bodies concerned with determination of research independence are described in Part 2 along with the training that they will have undertaken.

### **3.3 Appeals**

83. All individuals affected by decisions at any stage of the REF process as to their exclusion or inclusion from the REF submission, will be advised of their right of appeal and process of appealing that decision as described in Section 2.4.

84. Grounds for appeal for and against determination of research independence are:

- That the criteria for determining research independence as described in Section 3.1 have not been appropriately applied.
- That the procedures described in the COP have not been adhered to.

### **3.4 Equality Impact Assessment**

85. Before drafting the Code of Practice, the university conducted an initial Equality Impact Assessment (EIA), attached in Annex Q, to consider and understand the implications for equality of the process of identification of staff for inclusion in the REF submission.

The EIA will determine whether the processes for identifying staff, determining research independence and output selection may have a differential impact on particular groups with reference to the protected characteristics listed in the Equality Act 2010.

86. We will undertake a continuing process of Equality Impact Assessment (EIA) throughout the REF process as described in Section 2.5.



## **Part 4: Selection of Outputs**

### **4.1 Policies and Procedures**

#### **Internal Audit**

87. All eligible staff in the university were invited to participate in an audit of research outputs in February 2019. The audit asked the researcher to identify the Units of Assessment they could potentially submit under. In all cases, staff have indicated a first choice and in a majority of cases also nominated a second choice. This invitation was extended to former staff via the Research Leads in each School.
88. The results of the audit were reviewed by the Research Leads in each School and, external advice was sought on output quality, and, in the summer of 2019, initial discussions were held with Schools and Research Groups/Centres to determine the blend of units in which to submit. A draft final decision on the Units of Assessment to be submitted will be made by the REF Advisory Panel in autumn 2019.

#### **Internal Review**

89. The outputs that staff submitted through the audit in February 2019 will be the subject of a further internal review in autumn 2019. Staff will also be asked to submit details of further outputs and planned outputs to the Research and Postgraduate Office as part of an ongoing submission and identification process until the start of December 2020 to ensure that outputs produced by the cut-off point of 31<sup>st</sup> December 2020 are taken into consideration for selection.
90. Outputs will be assessed for REF eligibility for submission in the first instance including for Open Access Compliance as described in paragraphs 223 to 255 of the REF 2021 Guidance on Submissions.
91. The REF Advisory Panel will oversee the process of internal review to ensure that it is applied consistently and fairly across all Units of Assessment.
92. External peer reviewers will be identified for each Unit of Assessment and the criteria for rating the outputs will be agreed as set out in Part 3 of REF 2021 Panel Criteria and Working Methods. Internal peer reviewers will be fully briefed on the need to take account of this Code of Practice and will be provided with a copy of the Code of Practice before undertaking their assessment.
93. The internal review will include outputs eligible for submission to REF 2021 produced by staff who have left the university but only where those former members have explicitly expressed a desire for their outputs to be submitted or REF or where requested by a School Research Lead they have agreed to their submission. We do not propose to submit any outputs for former staff who were made compulsorily redundant but do propose to submit outputs from some staff who took voluntary severance and where they have expressly agreed to the submission of their outputs.
94. The number of outputs required to be submitted by each Unit of Assessment will be based on an average of 2.5 for each member of FTE staff submitting to the Unit after individual circumstances and exceptional circumstances as described in Section 4.3 and the permitted reductions tabled in Annex N have been taken into account.

## External Review

95. All research outputs identified for submission will be further evaluated by external reviewers against the definitions and criteria set out by the main UK REF panels and sub-panels. The external reviewers of research outputs will be appointed by the university on the basis of their academic experience and knowledge of the REF process and in consultation with the Research Leads in each School and Unit of Assessment Leads. External reviewers will provide an evaluation of each individual research output.
96. The REF Advisory Panel will manage the process of the external review of research outputs. This will be conducted in accordance with the current Code of Practice. External reviewers will be fully briefed on the need to take account of this Code of Practice and will be provided with a copy of the Code of Practice before undertaking their assessment. External assessors will not be given any information relating to individual staff circumstances.

Following the internal and external rating exercises the REF Advisory Panel, advised by UoA Panels, will commence the final output selection process in autumn 2020.

97. The most highly-rated eligible output for each individual staff member in a Unit of Assessment will be selected for submission.
98. Each Unit of Assessment will then select the highest quality remaining outputs, including those eligible outputs of former staff, based on the rating exercises carried out by the internal and external review processes described above.

Should the rating exercise deem a number of outputs to be of equal quality within a Unit of Assessment, the UoA Panel will, in consultation with the REF Advisory Panel, ensure that the selection takes account of the principles of equality, diversity and inclusion (EDI) to ensure an equitable spread across individuals in the first instance and subject specialism in the second.

We do not think of outputs in terms of individuals, except that each submitted Category A staff member must have at least one and no more than five (allowing for consideration of individual circumstances). We think of all outputs as a pool available for selection where each item has been reviewed by at least two reviewers, one internal, one external.

We will compile the required number of outputs plus a further ten per cent over the threshold of Total FTE x 2.5. We will then ask an external reviewer to rank them for us. At the margins, 10% above and 10% below the threshold of required outputs, we will assess outputs for EDI and will use this to measure the final submission at that crucial margin.

As an illustration. UoA 3 has 15 FTE of staff, requiring 38 outputs. The total eligible pool is 52. We will ask an external reviewer to rank all 52. We will then take 10% above and below the threshold (outputs ranked 34-43) and will assess them against EDI. Should this process identify a differential impact on particular groups or individuals with reference to the protected characteristics appropriate positive action will be taken.

99. Research excellence will be interpreted according to the definitions and criteria set out by the main UK REF panels and sub-panels.

Staff will be notified of the final selection of outputs in winter 2020 and provided with a provisional list of selected outputs that are due to be published before 31<sup>st</sup> December 2020.

#### **4.2 Staff, Committees and Training**

100. The operating criteria and terms of reference for individuals, committees, working groups and any other bodies concerned with the selection of outputs have been described in Part 2 along with the training that they will have undertaken.

101. Operating within its TOR, abiding by the Code of Practice, and in accordance with the published REF guidance, the REF Advisory Panel will:

- Develop and establish the process for the identification of Units of Assessments and individuals for submission to the REF
- Act as the coordinator for the collection of relevant information for each Unit of Assessment at each stage of the REF process
- Oversee the identification and appointment of external assessors of research outputs on the basis of their academic experience and knowledge of the REF process
- Oversee the identification and appointment of external assessors of research impact on the basis of their relevant experience and knowledge of impact in relation to the REF process
- Receive advice from UoA Panels.
- Review and evaluate all available relevant information at successive stages of the REF process to support the development of the final REF submission
- In accordance with the Code of Practice, decide which staff will be included in the REF2021 submission, and to which Unit of Assessments individuals will be submitted
- Notify all affected individuals of decisions at any stage of the REF process as to their exclusion or inclusion from the REF submission, and advise them of the right and process of appealing that decision
- Receive initial recommendations on the size, scope and content of each UoA from School UoA leads, and then make final decisions.
- Compile the final submission for recommendation to and final sign off by the VC
- Undertake bespoke on-campus training on equality, diversity and inclusion as described in Annex J.
- Monitor the emerging equality profile of the submission and the outcome of equality impact assessments.

102. The Chair of the REF Advisory Panel is responsible for overseeing the process for the identification of Units of Assessments that will constitute the university's submission and the identification of staff for inclusion in the REF submission.

103. Individuals and groups involved in the university's REF process shall liaise with the SLT from time to time.

104. All persons involved in the REF process shall abide by the university's Privacy Policy, which can be viewed in Annex R.

### 4.3 Staff circumstances

105. Universities are required to submit 2.5 outputs for each Full-time Equivalent (FTE) member of Category A staff (FTE) submitted in each Unit of Assessment. A minimum of one output per FTE is required and a maximum of 5 per FTE is permitted. It will be made clear to staff that the 2.5 average is a requirement of the Unit of Assessment and not individuals.
106. The four UK HE funding bodies recognise that an individual's circumstances may have affected their productivity during the REF assessment period (1 January 2014 to 31 July 2020) and this Code of Practice describes the processes whereby an individual member of staff can voluntarily declare such circumstances. Examples of these circumstances are described below, in Annex N of this Code of Practice and in the REF 2021 Guidance on Submissions.
107. The funding bodies have identified a number of equality-related circumstances that they would consider a constraint on an individual's ability to work productively during the assessment period. According to REF Guidance on Submissions (para 160), these circumstances include:
- a. Being an Early Career Researcher. (See Annex N for paragraphs 148 and 149 and 'Annex L' extracted from the REF 2021 'Guidance on submissions').
  - b. "Absence from work due to secondments or career breaks outside the HE sector."
  - c. "Qualifying periods of family-related leave."
  - d. "In UOAs 1–6, the number of outputs may be reduced by up to one, without penalty in the assessment, for Category A submitted staff who are junior clinical academics."
  - e. Circumstances with an equivalent effect to absence, that require a judgement about the appropriate reduction in outputs
    - i. Disability (See Annex N for Table 1: Summary of equality legislation extracted from the REF 2021 'Guidance on codes of practice')
    - ii. "Ill health, injury, or mental health conditions."
    - iii. "Constraints relating to pregnancy, maternity, paternity, adoption or childcare that fall outside of – or justify the reduction of further outputs in addition to – the allowances set out in Annex L of 'Guidance on submissions' (See Annex N)
    - iv. "Other caring responsibilities (such as caring for an elderly or disabled family member)."
    - v. "Gender reassignment."
    - vi. Other circumstances relating to the protected characteristics (See Annex N for Table 1: Summary of equality legislation extracted from the REF 2021 'Guidance on codes of practice') or relating to activities protected by employment legislation.
108. Staff may, as described in the communication plan (Annex B), voluntarily declare circumstances that have affected their ability to produce outputs within the assessment period. These will be assessed by the Research Excellence Framework Equality, Diversity and Inclusion Panel (REFEDIP), described in Section 2.3, which will assess cases made for the consideration of special circumstances, REFEDIP will advise the REF Advisory Panel of its decisions and staff will be notified of the outcome. At all times, this process will be confidential.

109. To support staff wishing to make a case for special circumstances, the university will make available a form for such declarations which will be based on the template provided by REF 2021 (see Annex M).

Staff will be advised that the form will be the only means by which the university will be gathering the information.

Staff will also be advised that in the case of exceptional circumstances whereby the REF 2021 requirement of a minimum of one output per individual researcher cannot be met their information will need to be submitted to REF but that it will be kept confidential to the REF team, the REF Equality and Diversity Panel (EDAP) and the main panel chairs.

The university will ensure that staff are made fully aware of the opportunity for them to declare individual circumstances that may have affected their productivity and that the process for so doing is safe and supportive. It will also be made clear that this is not something they should feel obliged to do.

110. All staff who have been identified as eligible for inclusion in REF 2021 will be contacted directly in autumn 2019, including those absent from the university, and invited to declare their individual circumstances by 2nd December 2019.

111. It will be made clear that the information needs to be based on verifiable evidence of the circumstances although the university expects to accept the individual's own declarations without the need for such evidence.

112. The REFEDIP will meet in December 2019 to consider all applications for consideration of individual circumstances. All declarations of circumstances will be treated as highly confidential and will be submitted to the REFEDIP Secretary in the first instance for consideration by the REFEDIP.

Staff will be formally advised of the outcome in writing by 20<sup>th</sup> December 2019 by the Deputy Director of HR who sits on the panel.

The process for further appeal is described in Section 2.4 and illustrated in Annex E. The process for further appeal on individual circumstances starts in January 2020 and concludes in February 2020 to enable the university to make any requests to REF 2021 to remove the minimum requirement of one output per individual in March 2020.

113. Where a staff member identifies through a declaration of their circumstances that they require further support this will be followed up with the individual in confidence by the Deputy Director of HR.

114. The processes for collection of declarations of circumstances and their consideration have been designed to be consistent across the Units of Assessment.

115. The outputs selection processes will take into account the circumstances of individuals; procedures for staff to declare circumstances voluntarily; and the capacity for Units of Assessments to make adjustments to the numbers of outputs in their submissions.

116. It will be made clear to staff that there is no expectation that they will contribute to the output pool.

Notwithstanding the fact that we do not have this expectation of staff members' contribution to the output pool, the outputs selection processes allows for the individual circumstances of staff to be obtained and reviewed by REFEDIP to ensure that staff who might otherwise have been in a position to submit outputs for REF 2021 have the

confidence that any circumstances affecting their productivity during the assessment period have been taken into consideration and recorded.

117. The university recognises that staff circumstances may change between completion of the declaration form and the census date of 31<sup>st</sup> July 2020. If that is the case staff should contact Human Resources to provide any updated information.

118. It is a requirement of the four funding bodies for REF 2021 that all Category A submitted staff must be returned with a minimum of one output including staff with individual circumstances.

119. However, a Unit of Assessment can return an individual without any outputs where the nature of their individual circumstances are exceptional and have had an adverse effect on their ability to submit the minimum requirement of one output.

Examples of exceptional circumstances are described below and in the REF 2021 Guidance on Submissions, they must have occurred within the period between 1<sup>st</sup> January 2014 and 31<sup>st</sup> July 2020, and they include:

- an overall period of 46 months or more absence from research, due to one or more of the circumstances set out in paragraphs 160 to 163 of Annex L of the REF 2021 Guidance on Submissions which has been included in Annex N of this Code of Practice (such as being employed as an Early Career Researcher for part of the assessment period).
- circumstances equivalent to 46 months or more absence from research, where circumstances set out in paragraph 160 of Annex L of the REF 2021 Guidance on Submissions which has been included in Annex N of this Code of Practice (such as mental health issues, caring responsibility, long term health conditions).
- two or more qualifying periods of family-related leave, as defined in Annex L of the REF 2021 Guidance on Submissions and included in Annex N of this Code of Practice.

120. The effect of these exceptional circumstances on the individual's ability to produce one output within the assessment period will be considered by REFEDIP as part of their consideration of individual circumstances described in Section 4.3.

Where, as a result of circumstances other than those identified above, there has been an effect on an individual's ability to produce one output a request to consider these circumstances can also be made.

121. Once REFEDIP have made a decision on the impact of exceptional circumstances on an individual they will share this decision with the REF Advisory Panel. Neither the personal details of the individual nor their individual circumstances will be shared with the REF Advisory Panel.

REFEDIP will simply put forward the case for the removal of the REF 2021 minimum requirement of one output for the individual concerned.

122. Requests to remove the requirement of a minimum of one output per individual in an affected Unit must be submitted to the funding body, Research England, for approval by March 2020.

123. Should the cumulative effect of individual circumstances be such that they have a disproportionate effect on the number of available outputs in a Unit of Assessment a reduction in the total number of outputs to be submitted can be requested for that Unit.

124. The REF Advisory Panel will be responsible for overseeing the assessment of the cumulative effect on a Unit of Assessment and deciding whether a request should be submitted for a reduction in the number of outputs.

UoA Panels will consider whether the process of declaration of individual circumstances has had any adverse effect on the number of available outputs for each Unit of Assessment and whether it is such that 2.5 outputs per FTE cannot be selected.

The UoA Panel Chair will write formally to the Chair of the REF Advisory Panel with a supporting statement explaining why a request for a reduction in the number of outputs needs to be made.

The REF Advisory Panel will decide whether there is a case for a request to be made to the funding body by the deadline of March 2020.

Such a request will be considered in the context of the size of the available output pool as the cumulative effect of individual circumstances will impact smaller Units of Assessment more than the larger ones or where the disciplines in the Unit of Assessments traditionally produce fewer larger outputs such as artefacts or monographs. Therefore, requests will be assessed on a case by case basis.

It should be noted that the funding bodies do not expect such requests to be made on a routine basis.

The unit reduction will be based on the tariffs in Annex L of the Guidance on Submissions, which are reproduced in Annex N of this CoP.

UoA Panel Chairs will be advised that the reduction has been approved on the basis of the declaration of individual circumstances but they will not be given any confidential information about the circumstances.

#### **4.4 Equality Impact Assessment**

125. Before drafting the Code of Practice, the university conducted an initial Equality Impact Assessment (EIA), attached in Annex Q, to consider and understand the implications for equality of the process of identification of staff for inclusion in the REF submission.

The EIA will determine whether the processes for identifying staff, determining research independence and output selection may have a differential impact on particular groups with reference to the protected characteristics listed in the Equality Act 2010.

126. We will undertake a continuing process of Equality Impact Assessment (EIA) throughout the REF process as described in Section 2.5.



REF 2021 Code of Practice  
Annex A

# Equality and diversity policy

First approved by the Diversity Steering Group 25 March 2014

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SLT



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**Appendix:** Links to further guidance

# Equality and diversity policy

## 1. Purpose

This policy sets out how the University intends to meet its equality commitments in respect of staff and students<sup>1</sup>, encompassing its general equality duty and duties in respect of the protected characteristics listed in the Equality Act 2010. This policy applies to all aspects of employment and study at the University, including recruitment, selection, education and assessment of students.

## 2. General duty

The Equality Act 2010 places a general duty on public bodies, including higher education institutions, to:

- advance equality of opportunity;
- foster good relations between people of different protected characteristics (including racial groups); and
- eliminate unlawful discrimination.

## 3. The University's commitments

- 3.1 London Metropolitan University values the diversity of its students and staff. It recognises that people from diverse backgrounds can bring new ideas and perceptions that enrich the learning environment.
- 3.2 London Metropolitan University is committed to providing a learning community in which the rights and dignity of all individuals are respected and which is free from unlawful discrimination, harassment and victimisation.
- 3.3 The University is committed to the production, implementation, review and monitoring of policies that promote equality for all those who study and work within the institution.
- 3.4 All students, staff and applicants will receive equal treatment regardless of age, disability, gender identity, marital or civil partner status, pregnancy or maternity, race, colour, nationality, ethnic or national origin, religion or belief, sex or sexual orientation (Protected Characteristics).
- 3.5 The University is committed to championing equality, diversity and inclusion by promoting:
  - diversity of student and staff recruitment;
  - inclusive curriculum, teaching, education and engagement; and
  - an inclusive community that furthers respect and opportunity for all those studying and working in it.

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<sup>1</sup> This policy does not form part of any contract between the University and its students and the University may amend it at any time.

- 3.6 London Metropolitan University is committed to equality of opportunity and treatment and to the production, implementation, review and monitoring of policies that promote equality and diversity within the institution. London Metropolitan University values diversity, recognising that people from diverse backgrounds can bring new ideas and perceptions that help increase organisational efficiency and improve services. The University is committed to promoting diversity in all of its activities and to taking affirmative action to combat discrimination. This policy is intended to demonstrate this commitment.
- 3.7 The University recognises its commitments under the law. The University is committed to providing equality of opportunity by aiming to ensure that its practices and procedures follow legal requirements and good practice as recommended by: the Equality Human Rights Commission (EHRC), The Equality Challenge Unit (ECU); the Government's Equality Office (GEO); the Chartered Institute of Personnel and Development (CIPD); and Universities UK (UUK). It is the University's policy to treat all individuals fairly and equitably regardless of gender, racial or cultural grounds, disability, age, gender reassignment, marriage and civil partnership, maternity and pregnancy, religious beliefs (including non belief), sexual orientation, trade union activity, or any other category where discrimination cannot be reasonably justified. The University will ensure that no requirement or condition will be imposed without justification that could disadvantage individuals on any of the above grounds.
- 3.8 The University will strive to create a positive, inclusive atmosphere, based on respect for people's differences, in which individuals are actively encouraged to reach their full potential.
- 3.9 All staff and students have rights and individual responsibilities to advance equality of opportunity, foster good relations, eliminate unlawful discrimination and respect different cultures. As a minimum, all staff and students should know how to identify behaviour which is contrary to the University's commitments and should challenge it in a supportive and non-confrontational manner.

#### **4. Aims**

- 4.1 The University's commitments are embodied in the following aims:
- the University aims to eliminate discrimination in our community of staff and students;
  - recruitment policies, practices and procedures will be examined and reviewed regularly to ensure that they do not discriminate unfairly, either directly or indirectly;
  - the University aims to eliminate discrimination in its practices by making all students and staff fully aware of their responsibilities under this policy and by regularly monitoring its operation and effectiveness;

- employment policies, practices and procedures will be examined and reviewed regularly by the Human Resources Director to ensure that they do not discriminate unfairly, either directly or indirectly;
- student policies, practices and procedures will be examined and reviewed regularly by the Director of Student Journey and the University Secretary's Office, to ensure that they do not discriminate unfairly, either directly or indirectly;
- job advertisements will include an equality and diversity statement;
- in the recruitment and selection of staff the University will seek to ensure that advertising is not inappropriately restricted;
- objective and justifiable job-related selection criteria will be used in the recruitment of staff. Appointments will be made on relevant ability and, where appropriate, qualification and experience;
- all staff will be provided with information on the University's Single Equality scheme; this Equality and Diversity policy and other policies related to equality and diversity;
- the University will ensure that terms and conditions of employment are applied fairly and consistently;
- the University will take advantage of the positive action provisions of the relevant equality legislation in circumstances where it deems it to be appropriate; and
- the University recognises the importance of training as a key element in the promotion of equal opportunities. Such training/guidance is viewed as particularly important for those involved in appraising the performance and potential of employees; identifying training needs; and recruitment and selection procedures.

## **5. Individual roles and responsibilities**

5.1 The governing body, academic board and all those in management and leadership roles will:

- through their specific defined responsibilities, have due regard to the equality duty;
- include in decision making consideration of how their decisions will impact upon staff and students with protected characteristics;
- receive and consider annual staff and student monitoring data; and
- promote diversity and equal opportunities.

5.2 The chairs of the University's committees are responsible for ensuring that equal opportunities and diversity principles are

integral to the work of the committees they lead and for considering equality and diversity implications identified in reports and policies and procedures including those for which the Board of Governors is accountable.

5.3 The Vice-Chancellor and Chief Executive is responsible for:

- ensuring that this policy and its related procedures, mechanisms and strategies are implemented effectively;
- providing a consistently high profile lead on issues covered by the policy;
- ensuring that all staff and students are aware of their responsibilities and commitments under the policy; and
- ensuring that appropriate action, under the policy, is taken against staff or students who are found to have acted in any way in an unlawfully discriminatory manner.

5.4 The Pro Vice-Chancellors and the Chief Operating Officer have responsibility for the development, co-ordination, dissemination, and monitoring of this policy, with specific responsibility for:

- promoting equal opportunities and the management of diversity and raising awareness of equality issues across the University's core business;
- providing appropriate training and information opportunities to staff and governors in support of the policy and adequately supporting them in order for them to fulfill their responsibilities appropriately;
- providing and publishing monitoring data in respect of staff and students in support of the policy;
- identifying and designating members of staff throughout the University to deal with reported incidents of racism or harassment; and
- maintaining a contact list of the member of staff within each school who is responsible for co-ordinating equality and diversity work.

5.5 The Pro Vice-Chancellor (Academic Outcomes) additionally has responsibility for ensuring that the University's commitment to equal opportunities and diversity is reflected in the design and delivery of the curriculum and for the development, co-ordination, dissemination and monitoring of this policy in respect of students with specific responsibility for:

- promoting and managing all matters relating to student equal opportunities and diversity; and
- providing and publishing monitoring data in respect of students in support of the policy.

5.6 The Senior Leadership Team is responsible for ensuring that:

- the University complies with all the anti-discriminatory legislation requirements, in particular the Equality Act 2010; the University complies with this policy and action plan and appropriate procedures, strategies and arrangements are implemented;
- this policy is regularly reviewed, and updates are duly communicated to staff; and
- relevant briefing/training is provided to all staff and governors on areas related to the policy and its implementation;

5.7 Heads of School and Directors have responsibility for:

- implementing this policy and its related procedures and strategies, including local action planning and review within their own school/department;
- ensuring that due regard is given to the equality duty in decision making processes (including developing, evaluating and reviewing policy; designing, delivering and evaluating services, and commissioning and procuring from others) and in doing so consider the needs and impact on staff and students with protected characteristics and record this;
- identifying and supporting one or more members of staff within their school/department who is responsible for supporting the ongoing mainstreaming of equality work;
- ensuring that staff are aware of their responsibilities and are given appropriate training and support;
- taking appropriate action against staff who discriminate unlawfully; and
- ensuring external partners are aware of the policy.

5.8 All members of staff are expected to be aware of, promote and implement this policy and to contribute to the maintenance of an environment in which the diversity and dignity of individuals is respected.

5.9 In addition, all teaching staff should:

- promote equality and diversity through their teaching programmes and through relations with students, staff and the wider community;
- ensure that the curriculum covers the knowledge, skills and values which students need to tackle discrimination when they meet it and to help them respect different cultures; and
- ensure that materials used to deliver the curriculum are free from sexist, racist and other discriminatory assumptions,

images and languages, unless they are being studied as examples of such.

- 5.10 The Head of Procurement is responsible for ensuring that contractors and suppliers are aware of, and comply with this policy.
- 5.11 The senior team will maintain an overview of the implementation of the Equality and Diversity policy and will consider the results of monitoring at least once every three years.
- 5.12 All staff and students are expected to support the University in delivering its commitments and to comply with the principles underpinning them.
- 5.13 Our Student Charter sets out student rights, responsibilities and expectations to support students in their studies, help them to flourish in shaping their future and empower them to fulfil their full potential. As a minimum, all students should engage with the London Met community in a respectful, honest and constructive manner and be aware of and abide by the University's regulations and codes of conduct.

## **6. Definitions of protected characteristics**

The Equality Act covers the same groups of individuals that were protected by the previous equalities legislation. In addition age, disability, gender reassignment, race, religion or belief, sex, sexual orientation, marriage and civil partnership, and pregnancy and maternity are now also known as 'protected characteristics'.

There are nine protected characteristics defined in the Equality Act:

- age;
- disability;
- gender reassignment;
- marriage and civil partnership;
- race;
- religion or belief;
- sex;
- sexual orientation; and
- pregnancy and maternity.

### **6.1 Age**

#### **6.1.1 Definition**

In relation to the protected characteristic of age, a reference to a person who has a particular protected characteristic is a reference to a person of a particular



age group. A reference to persons who share a protected characteristic is a reference to persons of the same age group. A reference to an age group is a reference to a group of persons defined by reference to age, whether by reference to a particular age or to a range of ages.

### **6.1.2 Protections**

People are protected from discrimination, harassment or victimisation on the grounds of their age or age group. All aspects of employment (or prospective employment) are protected from age discrimination, including:

- recruitment;
- employment terms and conditions;
- promotions and transfers;
- training; and
- dismissals.

The University's published [Retirement policy](#) sets out that the University values all staff and does not have a mandatory retirement age for staff.

## **6.2 Disability**

### **6.2.1 Definition**

The Equality Act 2010 defines a disabled person as anyone 'with a physical or mental impairment', which has 'a substantial and long-term adverse effect upon their ability to carry out normal day-to-day activities'.

### **6.2.2 Protections**

It is unlawful to discriminate against a member of staff or a job applicant with a disability by treating them less favourably for a reason related to their disability. The University will ensure that no requirement or condition will be imposed, without justification that could disadvantage individuals on the grounds of disability. The University supports and implements the Jobcentre Plus disability symbol initiative. Under the Equality Act 2010 it is permissible to treat a person more favourably than a non-disabled person.

Human Resources collect and maintain a confidential record of staff and applicants who declare a disability. Students may declare a disability on their application form or declare at a later date to our Disability and Dyslexia Service (DDS).

### **6.2.3 Commitments**

The University recognises its duty to make reasonable adjustments to the learning environment, working conditions or the physical environment, where this would help to overcome the practical effects of a disability.

### **6.2.4 Reasonable adjustments**

Heads/Directors are required to make reasonable adjustments for disabled persons where the disabled person personally experiences substantial disadvantage in comparison with non-disabled people in relation to:

- a provision, criteria or practice (i.e., benefits, facilities and services provided and includes arrangements, policies, procedures and activities);
- physical features (i.e. temporary or permanent design or construction of a building; exit or access features; fixtures, fittings, furnishings, equipment or other moveable property; and any other physical element or quality); or
- auxiliary aids (i.e. auxiliary services including those which provides additional support or assistance to a disabled person ranging from equipment to extra assistance)

It is not possible to give a general definition of what constitutes a 'reasonable adjustment' as this will depend upon an individual's specific needs and circumstances but the aim of such an adjustment is to enable the employee to develop and use their abilities on a basis equal to non-disabled colleagues, whenever possible.

When looking at specific adjustments for an individual, a number of factors including the resources available; the cost of the adjustment; the practicality of the changes; and the potential benefit to the member of staff and students as well as to other people will be considered.

### **6.2.5 Students who become disabled**

The University will actively seek to retain and support students who become disabled. When a student discloses a disability, we inform them about our services and encourage them to self-present. We also send a disclosure form to the DDS.

An assessment will take place which may require us to obtain medical evidence from the student's GP or to send them for an assessment with one of our onsite Educational Psychologists.

Once we have medical evidence we will assess them in order to look at what reasonable adjustments will be required for them to continue studying. These may include:

- lecture and reading material in advance;
- ergonomic furniture;
- exam arrangements; and/or
- Human support such as a notetaker etc.

We guide students to the Disabled Students Allowances (DSA) where they will receive additional support and external sources if required. We assist with the application process and also with implementing and monitoring this support on campus.

We will ensure that an Individual Needs Assessment Report (INAR) is issued, so that staff are aware of their obligations and actions to support the student. This may also be combined with meetings with key staff in order to understand supporting our more complex learners.

We will also continue to meet with and review the student's support, particularly in cases where the condition may flare up or be likely to deteriorate. This may also include a multiagency approach by the students' Disability Adviser, who will inform the student that they will stay in contact with other external support professionals to facilitate joined-up approach to support.

Finally, and only as a last resort we may discuss options such as reducing to part-time or distance learning where we can see the severity of the disability and impact on study is going to be so severe that we cannot reasonably adjust. In extreme circumstances, this may lead to a Fitness to Study assessment.

### **6.2.6 Members of staff who become disabled**

The University will actively seek to retain members of staff who become disabled and has signed up as a [Disability confident employer](#). Heads/Directors can seek advice from Human Resources on what reasonable adjustments might be available to staff. These options might include<sup>2</sup>:

- rearranging working methods;
- providing practical aids or equipment;

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<sup>2</sup> This list is not exhaustive.

- allowing flexible working, such as annualised hours and part time working and working in different locations, for example to fit in with regular medical treatment;
- alteration to the member of staff's job description and responsibilities;
- adjusting trigger points for management action in the application of sickness procedures; and
- redeployment

If an existing member of staff becomes disabled, they should inform their Head/Director at the earliest opportunity so that their support needs can be discussed and considered. Heads/Directors might wish to involve the Occupational Health service and their HR contact in discussions about reasonable adjustments. This might be the case where an individual has recently developed a condition and is unsure of its impact or where an individual has been absent from work due to long-term sickness and a return to work plan needs to be agreed. Referrals to the [Occupational Health Service](#) should be made using the [online OH referral form](#).

If the member of staff's requested adjustments can not be accommodated, the reasons for this should be explained to the member of staff by the Head/Director or delegated line manager.

In some circumstances, the Occupational Health Service might suggest that the manager should contact the Health and Safety team, to arrange a workstation assessment. The Occupational Health Service might recommend that an external Disability Employment Adviser at the local job centre is contacted, in which case Human Resources will contact and liaise with the Disability Employment Adviser, as appropriate.

An assessment of the job and the effects of the disability on the member of staff doing the job will be undertaken by the line manager with the member of staff, with the support of Occupational Health or Human Resources. If the type of help is not immediately obvious, particularly in relation to adaptations or specialist equipment, a more detailed technical assessment can be recommended.

The member of staff might also wish to look at the published [disability information](#) and might also wish to contact the external [Employee Assistance Programme](#) for confidential guidance or advice.

If an individual does not wish to disclose the nature of their disability, there is no obligation to do so. The University would however encourage members of staff to disclose, so that maximum support can be offered to them. The member of staff might choose whether to disclose the nature of their condition and its impact on their ability to undertake their role or just the impact of their condition.

### 6.2.7 The Access to Work scheme

The [Access to Work Scheme](#) is a government scheme designed to provide help to overcome the barriers that people with disabilities experience in the workplace that would not otherwise be covered by reasonable adjustment. Through this scheme, the government will either pay for or make a substantial grant towards the costs of additional support needed as a result of a disability.

The support that is available includes:

- **adaptations to premises and equipment** - this involves modifying the premises or equipment to make it accessible for a person with a disability;
- **special aids to employment** - provision of aids and equipment to a person with a disability, which a person without a disability who is doing the same job would not need;
- **support workers** – help with the costs of employing personal support for a person with a disability at a job interview, on their journey to and from work, or in the work place;
- **travel to work** – support when a person with a disability incurs extra costs in travelling to and from work, because of their disability; and
- **communications support at interview** – help with the cost of employing an interpreter or communicator to accompany a hearing impaired person, where there might be communication difficulties at a job interview.

Access to work support does not include funding for IT equipment such as laptop computers.

Further information can be found on the [Access to Work website](#)

## **6.3 Gender reassignment.**

### **6.3.1 Definitions**

The Equality Act 2010 defines the protected characteristic of gender reassignment as 'the person is proposing to undergo, is undergoing or has undergone a process (or part of a process) for the purpose of reassigning the person's sex by changing physiological or other attributes of sex'. The Act refers to a transsexual person as a person who has the protected characteristic of gender reassignment.

## **6.4 Marriage and civil partnership**

The Equality Act 2010 states that a person has the protected characteristic of marriage and civil partnership if the person is married or is in a civil partnership.

## **6.5 Race**

### **6.5.1 Definitions**

The Equality Act 2010 defines race as including colour; nationality; and ethnic or national origins. It defines a racial group as a group of persons defined by reference to race. A racial group can comprise two or more distinct racial groups.

## **6.6 Religion or belief**

### **6.6.1 Definitions**

The Equality Act 2010 states that 'Religion means any religion and a reference to religion includes a reference to a lack of religion. Belief means any religious or philosophical belief and a reference to belief includes a reference to a lack of belief'.

The Equality and Human Rights Commission states that for a belief to be protected by the Equality Act:

- It must be genuinely held;
- It must be a belief and not an opinion or viewpoint based on information available at the moment;
- It must be a belief as to a weighty and substantial aspect of human life and behaviour;
- It must attain a certain level of cogency, seriousness, cohesion and importance;
- It must be worthy of respect in a democratic society; and

- It must be compatible with human dignity and not conflict with the fundamental rights of others.

## **6.7 Sex (or gender)**

### **6.7.1 Definition**

A person's sex (also referred to as gender) refers to the fact that they are male or female. In relation to a group of people, it refers to either men or women or to either boys or girls.

## **6.8 Sexual orientation**

### **6.8.1 Definition**

The Equality Act 2010 states that 'sexual orientation means a person's sexual orientation towards persons of the same sex; persons of the opposite sex; or persons of either sex'.

## **6.9 Pregnancy and maternity**

### **6.9.1 Definition**

Pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth, and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding.

A woman is protected from less favourable treatment whilst she is pregnant, on maternity leave or breast-feeding.

## **7. Positive action**

The [Equality and Human Rights Commission](#) (EHRC) defines Positive action as 'the steps that an employer can take to encourage people from groups with different needs or with a past track record of disadvantage or low participation to apply for jobs'. This is not the same as 'positive discrimination' or 'affirmative action' which equality law does not allow.

The EHRC suggests that an employer can use positive action where they reasonably think, on the basis of some evidence, that:

- people who share a protected characteristic suffer a disadvantage connected to that characteristic;
- people who share a protected characteristic have needs that are different from the needs of people who do not share it; or

- participation in an activity by people who share a protected characteristic is disproportionately low.

The above reasons might overlap, for example, people sharing a protected characteristic may be at a disadvantage and that disadvantage may also give rise to a different need or may be reflected in their low level of participation in particular activities.

Employers can take proportionate action to:

- enable or encourage people to overcome or minimise disadvantage;
- meet different needs; or
- enable or encourage participation.

Positive action in recruitment could include encouraging particular groups to apply, or helping people with particular protected characteristics to perform to the best of their ability (for example, by giving them training or support not available to other applicants). An example of when an employer might decide to take positive action is if they find that the make up of their workforce is different from the make up of their local population, so they decide to encourage people who share particular under-represented protected characteristics to apply for vacancies.

## **8. Breaches of the policy**

- 8.1 The University expects all staff and students to comply with this policy and will not tolerate any acts of unlawful discrimination or harassment. Any such acts will be investigated and where appropriate dealt with under relevant disciplinary or conduct procedures.
- 8.1 Serious cases of deliberate discrimination may amount to gross or major misconduct resulting in dismissal or termination of registration as a student.
- 8.2 Any student who believes that they have suffered discrimination can raise the matter through the University Complaints Procedure. Complaints will be treated in confidence and investigated as appropriate.
- 8.3 No student will be victimised or retaliated against for complaining about discrimination. However, making a false allegation deliberately and in bad faith will be treated as misconduct and dealt with under the Student Conduct Regulations.

## **9. Complaints**

- 9.1 The University is an adult learning environment, and accordingly students and staff are expected to treat each other responsibly and attempt to resolve any issues between them by discussion rather than resorting to formal procedures; however, the



University recognises that sometimes such informal mechanisms are inappropriate or ineffective. Any student who considers that they have been treated in a way that is contrary to this policy can raise a complaint in accordance with Section 8 of the [General Student Regulations - Student Appeals and Complaints](#).

- 9.2 Any member of staff who considers that they have been treated in a way that is contrary to this policy e.g. concerns about discrimination or harassment, should raise the matter with their line manager or head/director, in the first instance attempting to resolve the issue. Alternatively if they are a member of a recognised trade union they might wish to contact a trade union representative. They may also wish to contact the [Employee Assistance Programme](#) or seek resolution through mediation.
- 9.3 It should be the objective of all parties to reach a satisfactory resolution, via informal channels, wherever possible, with advice from HR, as appropriate. If the matter is not resolved or the member of staff does not consider that it is appropriate to pursue the complaint through informal means, the individual might wish to seek redress through the University's [Grievance procedure](#) or in the case of alleged harassment, through the [Harassment policy](#). Complaints will be dealt with promptly, fairly and confidentially.
- 9.4 If a job applicant wishes to complain about a disability issue in relation to recruitment and selection they should write to the Human Resources Director who will arrange to have the complaint investigated.
- 9.5 The University treats acts of discrimination and harassment extremely seriously and will seek to safeguard all parties during the investigation of allegations. Disciplinary action will be taken, as appropriate, where allegations of discrimination or harassment are founded or where allegations are found to be vexatious and have caused unnecessary distress to colleagues.
- 9.6 The University will ensure that staff who make a complaint of unlawful discrimination or harassment are fully supported and are not victimised as a result of making a legitimate complaint.
- 9.7 Staff who consider that they have been subject to harassment have the right to make a complaint under the University's [Harassment policy and procedure](#). Complaints against students should be dealt with under the [Regulations governing student conduct](#). Staff who consider they have been subject to discrimination have the right to make a complaint under the University's [Grievance procedure](#).

## **10. Training and development**

- 10.1 In keeping with the University's commitment to progressive employment policies, the University will provide equality

awareness training for all staff. General equality and diversity information and briefings will be published online. The University will ensure wherever possible that staff development events are accessible to all staff.

## **11. Monitoring and assessing effectiveness**

- 11.1 The University is committed to effective action to eliminate all forms of unlawful discrimination. The University will therefore collect, analyse and assess relevant data, in order to measure and consider how improvements could be made under its equality duty, through the setting of targets or other action. The information will be reported to the senior management team which will evaluate the progress that the University is making towards meeting its equality objectives.
- 11.2 The Board of Governors will maintain an overview of the implementation of this Equality and Diversity policy, and the Academic Board will consider annually the results of student monitoring.

## **12. Maintenance and review**

12.1 The University will:

- review this policy on a regular basis in light of good practice and changes in relevant legislation;
- assess, review and revise other University policies for their effectiveness in eliminating discrimination and how they give due regard to the equality duty;
- use cross-referencing to ensure clear links between the Equality and diversity policy and other University policies and functions; and
- use the assessment and monitoring findings to expand, revise, update, improve and maintain the Equality and diversity policy and also establish or revise priorities, targets and initiatives in appropriate strategic plans.

## **13. Publishing arrangements**

13.1 The University will:

- publicise and promote this policy through the University's staff and student websites; and
- make a copy of the policy available to current staff and issue new staff with a copy of the policy and details of University equality and diversity training at induction.

## **14. Vicarious liability**

- 14.1 Heads/directors and line managers should be aware that any form of discrimination against members of staff or colleagues by their subordinates might result in formal proceedings against them at an Employment Tribunal. In such cases the heads/directors or line manager could be held vicariously liable for the actions of their staff and could be required to attend an Employment Tribunal. A manager could be found to be vicariously liable for discrimination where it is shown they had not taken reasonable steps to ensure the discrimination did not take place. To avoid this risk, managers should note their responsibilities under this policy and should seek to ensure that they and their own staff have adequate knowledge and training such that they are aware of and capable of exercising their responsibilities under this policy.

## **Appendix – Further information and guidance**

### **1. Definitions and examples of direct and indirect discrimination; harassment; victimisation; and reasonable adjustments in relation to disability**

Definitions and examples can be found on the [Equality and Human Rights Commission web page](#) () and the [Equality Challenge Unit webpage](#) ()

### **2. Disability**

Further guidance is available in the [guidance on the Equality Act](#) produced by HM Government's Office for disability issues.

# London Metropolitan University REF 2021 Code of Practice Annex B

## Communication Plan and Timeline of REF Activity

The university has devised a communication plan to create widespread awareness amongst academic staff of London Metropolitan University's REF 2021 Code of Practice (CoP) and the process for submission to REF 2021 in March 2021. Our guiding principles for this communication plan are to support and amplify the core ethos of our Code of Practice by being transparent, consistent, accountable and inclusive.

Means of communication will include (or have included):

- Meetings with staff in focus groups (June, two events) and follow-up all-staff meetings (September, two events).
- Bespoke REF emails with key dates, deadlines and updates for academic staff.
- Consultation with Heads of School, Research Leads, staff and representatives concerning newly-introduced workloads for research (rolling out 2019-20).
- Regular REF information sessions in Schools. These meetings will include the Pro-Vice-Chancellor (Research and Knowledge Exchange), Head of Research Policy and Implementation and members of the REF Advisory Panel to answer questions from staff throughout the process
- Regular REF drop-in sessions located in Schools led by Unit of Assessment Co-ordinators
- Dedicated REF email for staff comments [REF2021@londonmet.ac.uk](mailto:REF2021@londonmet.ac.uk)
- Web content internal (Staff Zone) and external (Public website)
  - Staff Zone to include copy of Code of Practice, FAQs and contact details
- Regular updates via:
  - Met Connect (all staff email)
  - Regular staff meetings (In person) – Senior Management Team (SMT), Senior Leadership Team (SLT), School and professional service department meetings
  - Digital display screens

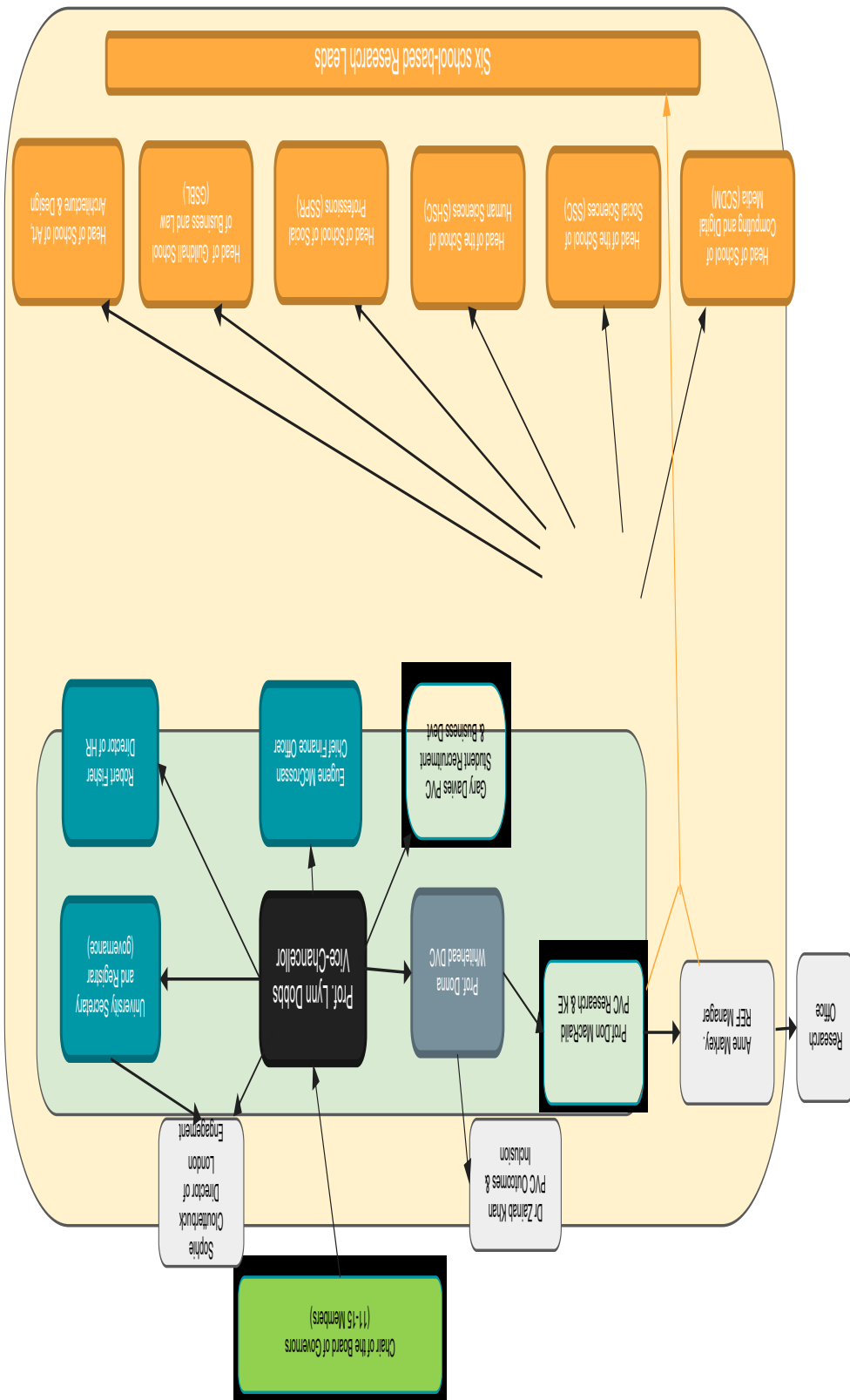
## Timeline

<u>March-April 2019</u>	Internal audit of potential research outputs to inform decision on which Units of Assessment the University will submit to.
<u>May-June 2019</u>	External review of outputs to confirm Units of Assessment.
<u>May 2019</u>	Consultation on Draft Code of Practice with Staff Representative Groups including University and College Union representatives, Senior Management Team, Senior Leadership Team; Academic staff; Review EIA.
<u>May-June 2019</u>	Response to Consultation shared with all staff; CoP redrafted; final CoP shared with all academic staff, Academic Board and Board of Governors.
<u>7 June 2019</u>	Submission of Code of Practice to REF 2021 for review by the Equality and Diversity Advisory Panel (EDAP).

<u>June 2019</u>	E-mail submitted CoP to all current potential Category A eligible staff, as defined by REF 2021 i.e. permanent academic staff on “teaching and research” or “research only” contacts using appropriate accessible formats; CoP to be made available on the Staff Zone of the university intranet; CoP to be made available in hard copy through the Research Office; CoP e-mailed to all academic staff absent from work on long term leave.
	Staff Focus Groups on REF and research culture, led by the PVC Research.
<u>31 Aug 2019</u>	Deadline for submission of draft Impact Case Studies.
<u>July-Sept 2019</u>	Allocation of research workloads First appeals against workload distribution (deadline: 30 <sup>th</sup> Sept) Consultation with Unions over workloads for Research.
	Review EIA.
<u>Sept 2019</u>	Final draft of the revised Code of Practice 10 <sup>th</sup> Sept; final consultation with representative bodies on workload allocations and REF submissions.
<u>Sept 2019</u>	Two Town Hall meetings with staff.
<u>Sept 2019</u>	Training to support career development pathways commences.
<u>Sept 2019</u>	Further peer review process of submittable outputs commences.
<u>Sept 2019</u>	Further communications with staff and staff representative bodies to discuss research workload allocations.
<u>Sept 2019</u>	Revised Code of Practice submitted.
<u>End Sept 2019</u>	Feedback on Impact Case Studies; draft final decision on Units of Assessment to be submitted
<u>Oct 2019</u>	Research workload allocations adjusted following determination of appeal results by REFEDIP
<u>Oct 2019</u>	Equality training for staff involved in REF decision-making.
<u>Oct 2019</u>	Final decision on REF submission content (staff, ICSs, etc).
<u>Oct 2019</u>	REF Information sessions in schools introducing, requests for individual circumstances processes, determination of research independence and and the appeals process and the output selection process.
<u>Oct-Nov 2019</u>	Determination of Research Independence. Decisions communicated to affected staff.

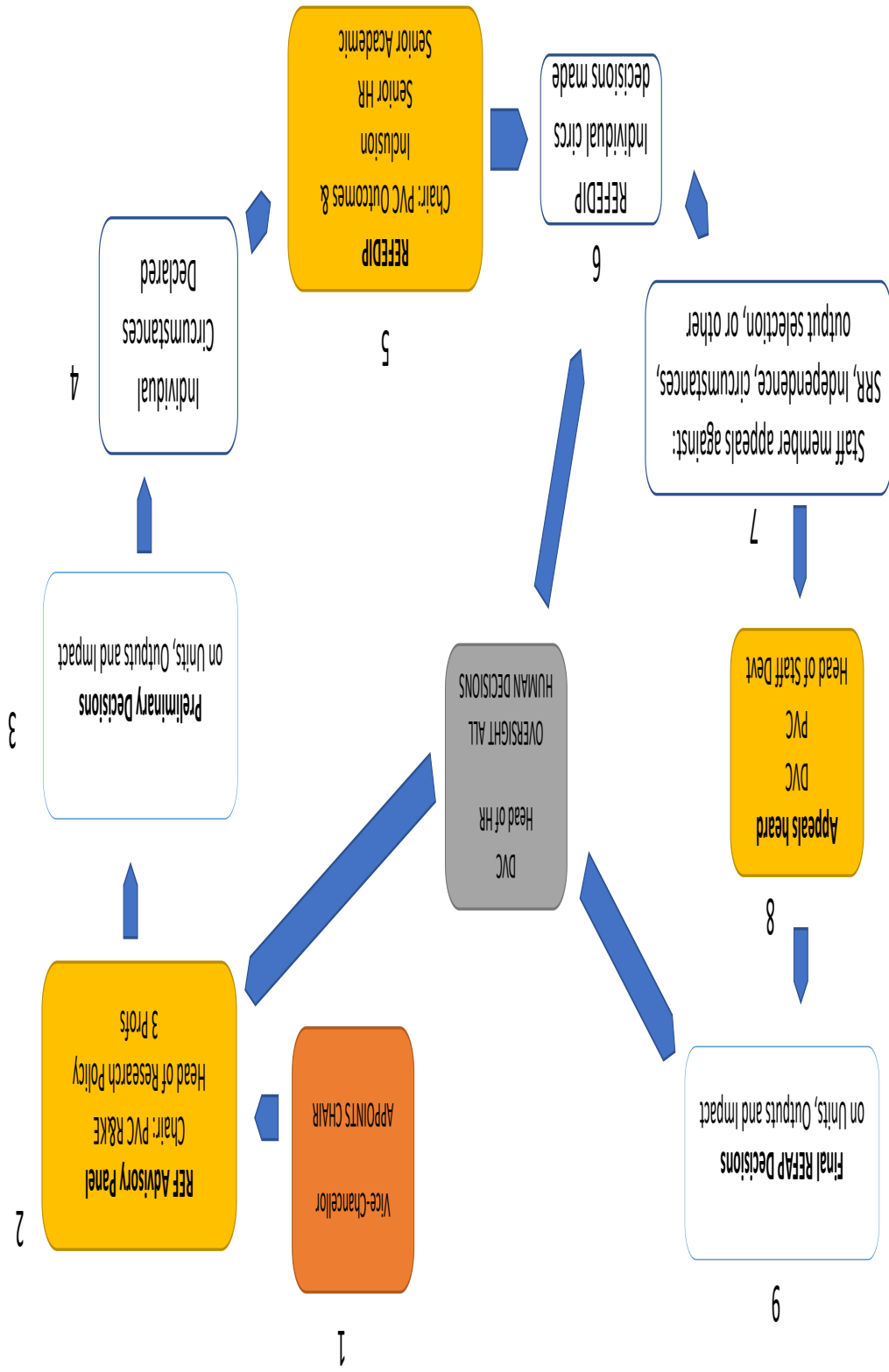
<u>Early Nov 2019</u>	Appeals pertaining to Research Independence open (deadline 30 <sup>th</sup> Nov).
<u>1 Dec 2019</u>	Deadline for receipt of declaration of circumstances that have affected an individual's research productivity.
<u>mid-Dec 2019</u>	REFEDIP meets to consider individual circumstances.
<u>Dec 2019</u>	Initial outcomes of declarations of circumstances before Christmas.
<u>Dec 2019</u>	Provisional publication date of submitted and approved Codes of Practice by REF 2021.
<u>January 2020</u>	Appeals process for identification of staff with significant responsibility for research; for determination of research independence; adherence to Code of Practice and consideration of circumstances commences (at least two meetings of the full Appeals Panel, chaired by the DVC) and, if necessary, final stage appeal mechanism, chaired by the VC, determines final outcomes.
<u>February 2020</u>	Submission of staff individual circumstances to REF 2021.
<u>April 2020</u>	Appeals process for output selection on procedural but not academic grounds commences. Appeals Panel meets if necessary, final stage appeal mechanism, chaired by the VC determines final outcomes.
<u>31 July 2020</u>	REF census Date.
<u>Autumn 2020</u>	Selection of outputs for submission.
<u>31 March 2021</u>	Submission to REF 2021.
<u>April 2021</u>	Submission of final Equality Impact Assessment to EDAP.
<u>31 Dec 2020</u>	End of publication period (cut-off point for publication of research outputs, and for outputs underpinning impact case studies).
<u>29 Jan 2021</u>	Deadline for providing further details for outputs pending publication; redacted versions of impact case studies; and corroborating evidence held for impact case studies.
<u>December 2021</u>	Publication of REF 2021 outcomes.
<u>Spring 2022</u>	Publication of submissions, panel overview reports and sub-profiles.

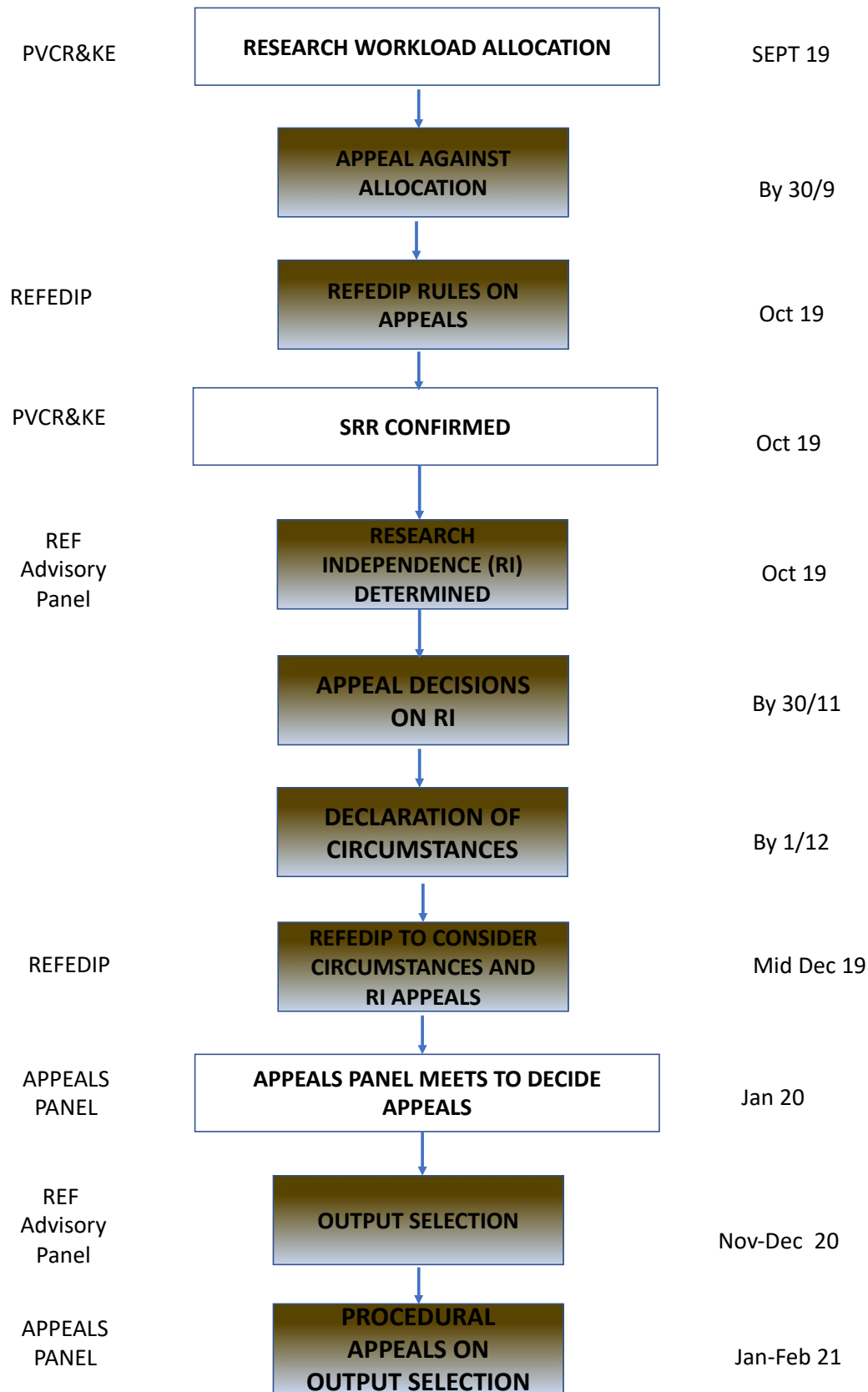
# Annex C University Leadership Structure and Reporting Lines





# Annex D REF Decision-Making in Relation to Governance; Who does What?





**Annex E – Timeline of Decisions and Appeals**

## Annex F

### LMU REF Advisory Panel

The REF Advisory Panel will advise the Vice-Chancellor on the university's final submission to Research Excellence Framework (REF) 2021, and the Vice-Chancellor will make the final decision on the submission London Met will make. The REF Advisory Panel will lead REF preparations, including drafting the Code of Practice and will advise on the final Unit of Assessment submissions. The Panel is charged with ensuring preparations are consistent with UKRI and the REF team's equality and diversity criteria.

### Terms of Reference

- (a) To advise the Vice-Chancellor on the final REF 2021 submission;
- (b) To advise on all elements of the REF submission including the identification of UoAs and the content of those, and to ensure data, impact, environment and output presentation are all consistent with UKRI's guidance;
- (c) To ensure that the university develops and follows its own REF Code of Practice, consistent with the university's own equality of opportunities' codes, and with wider equal opportunities legislation;
- (d) To provide regular reports to Research Committee and to consider processes for communicating REF decisions to the academic staff base

### Membership:

Pro Vice-Chancellor (Chair)  
Head of Research Policy and Implementation  
Professor  
Professor  
Professor  
Senior Administrator (secretary to the panel)

Professor Don MacRaid  
Anne Markey

*Panel members will maintain absolute confidentiality at all times and will not promote their own subjects over the university's wider strategic need.*

## **Annex G**

### **Unit of Assessment Panel**

The Unit of Assessment (UoA) Panel will recommend to the University's REF Advisory Panel outputs for submission to the Research Excellence Framework (REF) 2021 within their Unit of Assessment. The UoA Panel is charged with ensuring that the UoA's preparations are consistent with UKRI and the REF team's equality and diversity criteria.

### **Terms of Reference**

- (a) To advise the REF Advisory Panel on the final REF 2021 submission;
- (b) To advise on all elements of the REF submission for their UoA including the identification of outputs and impact case studies, and to ensure data, impact, environment and output presentation are all consistent with UKRI's guidance;
- (c) To ensure that the university develops and follows its own REF Code of Practice, consistent with the university's own equality of opportunities' codes, and with wider equal opportunities legislation;
- (d) To co-ordinate identification and preparation of all data, impact, environment and output presentation within each UoA and across Schools where required.
- (e) To provide regular reports to the REF Advisory Panel

### **Membership:**

UoA Lead (Chair)  
2-3 Professors or Senior Academics (ensuring cross School representation)  
Academic Business Administrator (secretary to the panel)

*Panel members will maintain absolute confidentiality at all times and will not promote their own subjects over the university's wider strategic need.*

## **Annex H**

### **Research Excellence Framework Equality, Diversity and Inclusion Panel (REFEDIP)**

The REFEDI Panel supports the REF Advisory Panel in order to ensure Equality, Diversity and Inclusion principles are promoted during the development, selection and submission of the London Met REF 2021 submission. REFEDIP will also manage confidential processes for staff to declare individual circumstances.

REFEDIP is a fixed-term panel that will deal only with REF 2021 at London Met and will be disbanded after the submission is made.

#### **Terms of Reference**

- a. To ensure Equality, Diversity and Inclusion issues are fully and properly addressed during the assembling of our institutional REF submission.
- b. To ensure compliance with university and wider legislative compliance with the principles and practices of EDI.
- c. To ensure consistency and transparency in decision-making in relation to REF 2021;
- d. To develop and implement a clear and robust process for staff to declare individual circumstances;
- e. To consider and adhere to principles of confidentiality, and to inform the REF Advisory Panel of outcomes swiftly and clearly.
- f. To receive and decide the outcomes of declarations of individual circumstances from staff.
- g. To receive and review written complaints from colleagues regarding any aspect of the operation of the REF process for decision or forwarding to REF Advisory Panel, SLT, or other university body or group for decision.

#### **Membership**

Pro Vice-Chancellor (Outcomes and Inclusion) (Chair)  
Deputy Director of HR  
Senior academic

*Secretary*  
Member of HR

## **Annex I**

### **Appeals Panel**

The Appeals Panel will meet at least twice between January 2020 and the final submission date of 27<sup>th</sup> November 2020. Effectively, the Appeals Panel will provide the penultimate test of REF Advisory Panel decisions and the process of initial appeal has been heard by REFEDIP. It will therefore hear appeals against each stage of the development of our REF 2021 submission. It will also ensure EDI is upheld. Final appeals against the Appeals Panel are made to the VC and Director of HR, thus exhausting the appeals mechanisms.

### **Terms of Reference**

- (a) To meet not less than twice between January and November 2020 to ensure that all appeals have been heard against each possible stage in the development of our submission;
- (b) The Appeals Panel will determine the legitimacy of decisions on SRR;
- (c) The Appeals Panel will determine the legitimacy of the REF Advisory Panel decisions on output selection;
- (d) The Appeals Panel will hear appeals following REFEDIP considerations of staff circumstances and appeals against decisions on Research Independence;
- (e) To report final appeals decisions to the VC and Head of HR prior to any absolutely final appeal to them.

### **Membership:**

Deputy Vice Chancellor  
Pro-Vice Chancellor (Student Recruitment and Business Development)  
The Head of Centre for Professional and Educational Development

## **Annex J REF EDI Training Programme**

### **Equality, Diversity, Inclusion and REF 2021**

The University is committed to Equality, Diversity and Inclusion, and this training programme is a crucial plank in ensuring that our REF submission is compiled through a set of processes that are fair to all staff and are free of bias (conscious or unconscious). All REF Panel Members, Research and Unit of Assessment Leads, Research and Postgraduate Office staff, and all senior staff involved in REF panel appointments and REF processes, from unit-level submission compilation through staff and output identification to the appeals process, must attend this session. This session will provide guidance on

- The legislation that underpins EDI in REF2021
- How to ensure EDI is appropriately embedded in our REF decisions about the identification of staff, outputs and Impact Case Studies.
- To ensure all staff with SRR are appropriately represented in the way we represent ourselves, as a research community, in our institutional and UoA-level environment statements and Impact Case Study narratives.
- How to identify and avoid concepts of conscious and unconscious bias in respect of the REF 2021. This training is specific and is additional to the University's compulsory bias training.
- Support staff to utilize channels for the declaration of special circumstances and appeals, and to enable them to do with confidence about our sensitivity and confidentiality.

### REF Training Sessions: two sessions in October 2019

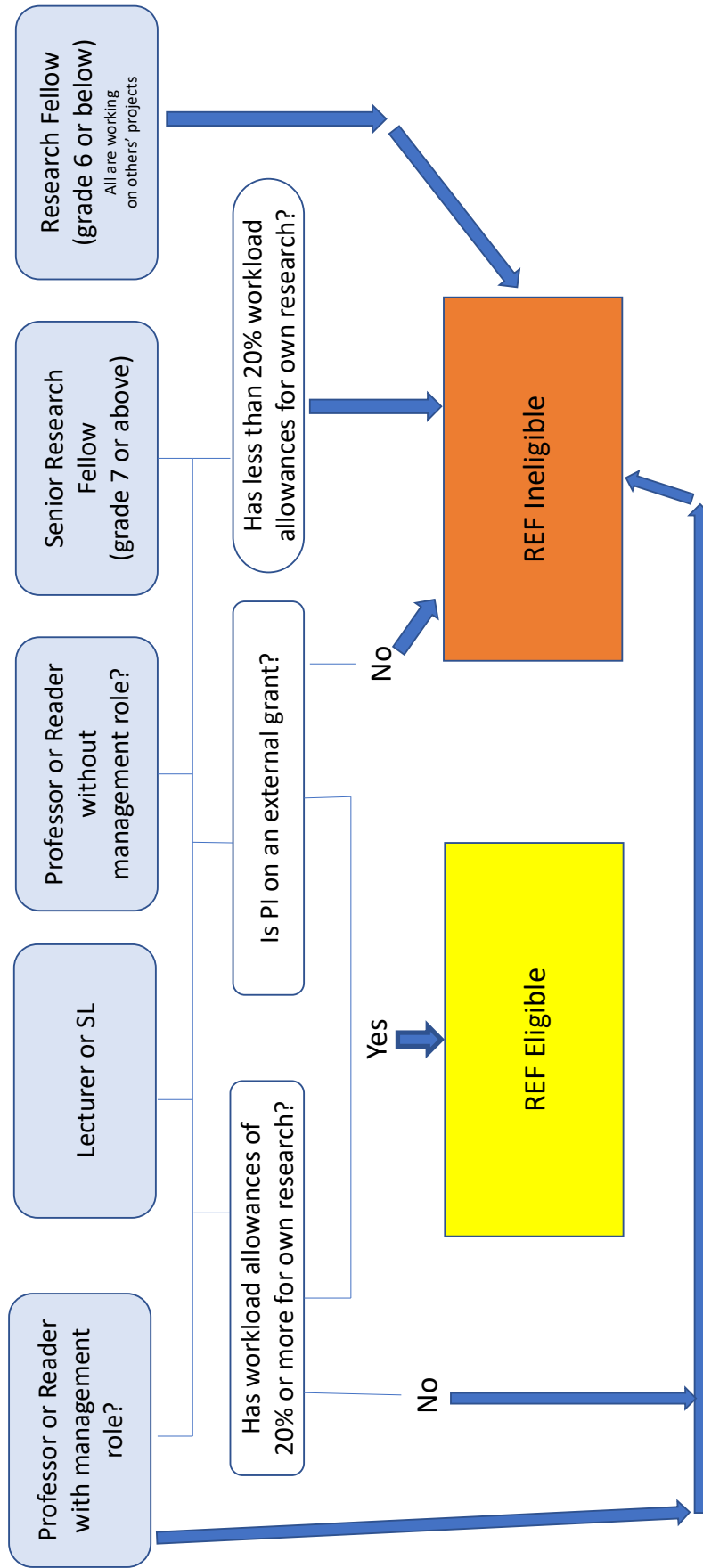
This session will be led by Rosemary Benson, Professional Development Manager, and Dr Digby Warren, Head of CPED, from our Centre for Professional and Educational Development (CPED) with the support of Anne Markey, Head of Research Policy and Implementation.

	<b>Lead</b>	<b>Time (mins)</b>	<b>Suggested Time</b>
Overview REF and EDI	Dr Digby Warren	30	10:00-10:30
EDI and our Code of Practice	Anne Markey	30	10:30-11:00
Bias and Unconscious bias	Rosemary Benson	30	11:00-11:30
Identifying staff, determining research independence and selecting outputs: what should you be looking for to ensure EDI?	Anne Markey	60	11:30-12:30
Lunch		30	
Individual Staff Circumstances and Reduction in outputs: What can we do, what should we do?	Anne Markey	30	13:00-13:30
Equality impact assessments: regular assessment	Digby Warren	20	13:30-13:50
Q&A wrap-up including signposting to online training.			

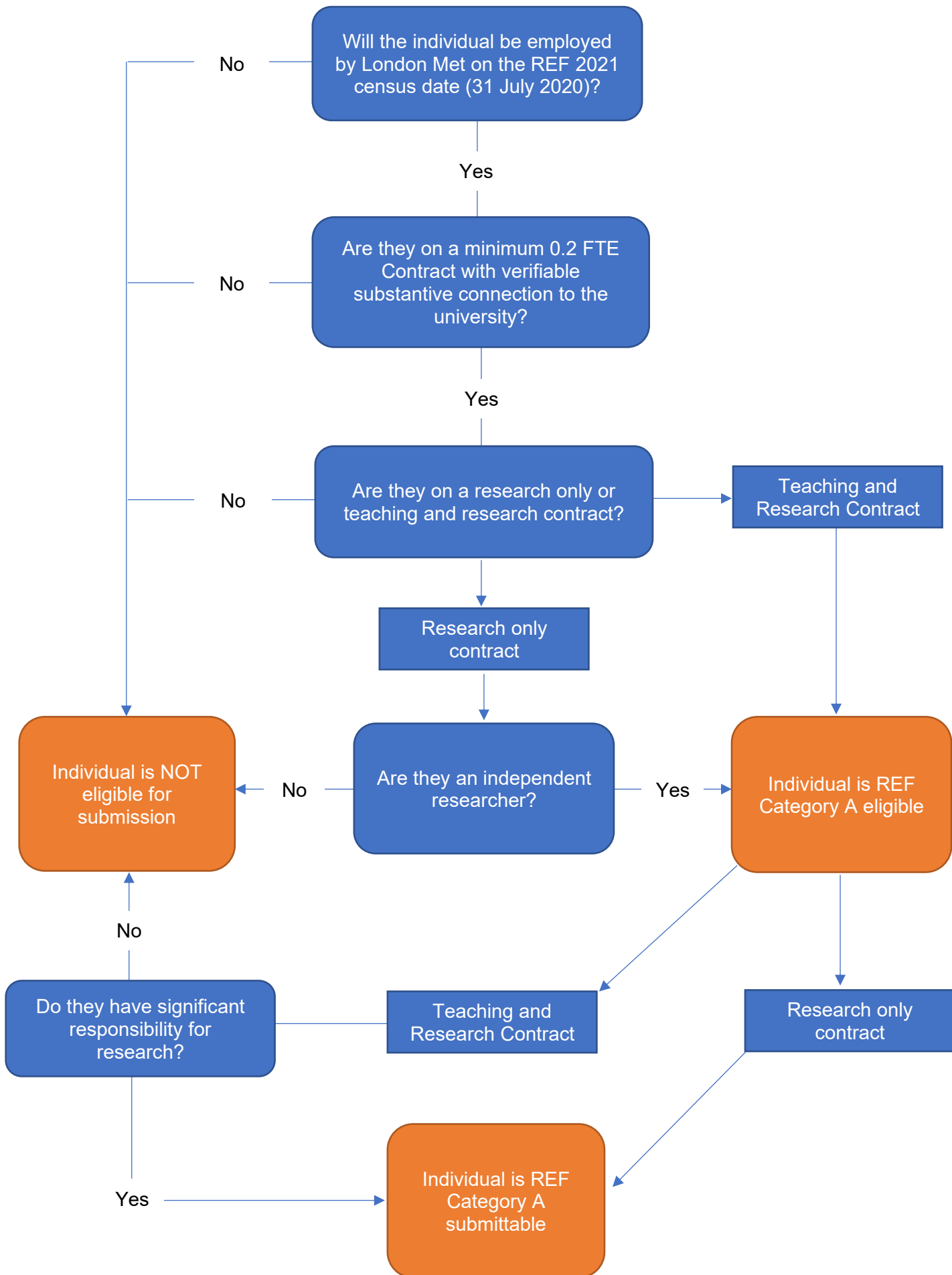


## Annex K Determining Research Independence

Only staff employed here on the REF census date



## Annex L Diagram showing stages of identification and approval



## **Annex M – Declaration of individual circumstances template**

- The funding bodies recognise that an individual researcher's productivity might have been affected by circumstances during the REF assessment period. They have identified a number of equality-related circumstances they would consider a constraint on an individual's ability to work productively and these are described in Section 4.3 and Annex M of this Code of Practice.
- All London Met staff identified as eligible for inclusion in REF 2021, including those absent from work, will be written to in Autumn 2019 and provided with details of the equality-related circumstances, the process for disclosure and timeframes.
- The procedures for the declaration of circumstances, the decision making and appeals processes and the timeline are described in Section 4.3 of this Code of Practice.
- The processes for taking circumstances into account in the output selection process are described in Section 4.3 of this Code of Practice.
- We have appended the original REF 2021 Declaration of Individual Staff Circumstances template to demonstrate our intention to use the original template as a basis for the form we adopt.

## Declaration of Individual Staff Circumstances template

*[This template is intended to help institutions when developing a safe and supportive process for staff to declare equality-related circumstances. Institutions are not required to use this template and may adapt it to suit the specific institutional context.]*

This document is being sent to all Category A staff whose outputs are eligible for submission to REF2021 (see '[Guidance on submissions](#)', paragraphs 117-122). As part of the university's commitment to supporting equality and diversity in REF, we have put in place safe and supportive structures for staff to declare information about any equality-related circumstances that may have affected their ability to research productively during the assessment period (1 January 2014 – 31 July 2020), and particularly their ability to produce research outputs at the same rate as staff not affected by circumstances. The purpose of collecting this information is threefold:

- To enable staff who have not been able to produce a REF-eligible output during the assessment period to be entered into REF where they have;
  - circumstances that have resulted in an overall period of 46 months or more absence from research during the assessment period, due to equality-related circumstances (see below)
  - circumstances *equivalent* to 46 months or more absence from research due to equality-related circumstances
  - two or more qualifying periods of family-related leave.
- To recognise the effect that equality-related circumstances can have on an individual's ability to research productively, and to adjust expectations in terms of expected workload / production of research outputs.
- To establish whether there are any Units of Assessment where the proportion of declared circumstances is sufficiently high to warrant a request to the higher education funding bodies for a reduced required number of outputs to be submitted.

### Applicable circumstances

- Qualifying as an ECR (started career as an independent researcher on or after 1 August 2016)
- Absence from work due to secondments or career breaks outside the HE sector
- Qualifying periods of family-related leave
- Junior clinical academics who have not gained a Certificate of Completion of training by 31 July 2020
- Disability (including chronic conditions)
- Ill health, injury or mental health conditions
- Constraints relating to family leave that fall outside of the standard allowances
- Caring responsibilities
- Gender reassignment

If your ability to research productively during the assessment period has been constrained due to one or more of the following circumstances, you are requested to complete the attached form. Further information can be found paragraph 160 of the Guidance on Submissions (REF 2019/01). Completion and return of the form is voluntary, and individuals who do not choose to return it will not be put under any pressure to declare information if they do not wish to do so. This form is the only means by which the University will be gathering this information; we will not be consulting HR records, contract start dates, etc. You should therefore complete and return

the form if any of the above circumstances apply and you are willing to provide the associated information.

### **Ensuring Confidentiality**

*[In this section the institution should explain how it will go about ensuring confidentiality, in terms of what will happen to the returned forms, who will see the information and how it will be used, and how staff will be informed about the outcomes.]*

If the institution decides to apply to the funding bodies for either form of reduction of outputs (removal of 'minimum of one' requirement or unit circumstances), we will need to provide UKRI with data that you have disclosed about your individual circumstances, to show that the criteria have been met for reducing the number of outputs. Please see the ['Guidance on submissions'](#) document (paragraphs 151-201) for more detail about reductions in outputs and what information needs to be submitted.

Submitted data will be kept confidential to the REF team, the REF Equality and Diversity Advisory Panel, and main panel chairs. All these bodies are subject to confidentiality arrangements. The REF team will destroy the submitted data about individuals' circumstances on completion of the assessment phase.

### **Changes in circumstances**

The university recognises that staff circumstances may change between completion of the declaration form and the census date (31 July 2020). If this is the case, then staff should contact their HR partner to provide the updated information.

To submit this form you should **[institutions should provide necessary information]**

**Name:** Click here to insert text.

**Department:** Click here to insert text.

Do you have a REF-eligible output published between 1 January 2014 and 31 July 2020?

Yes

No

Please complete this form if you have one or more applicable equality-related circumstance (see above) which you are willing to declare. Please provide requested information in relevant box(es).

Circumstance	Time period affected
<p><b>Early Career Researcher (started career as an independent researcher on or after 1 August 2016).</b></p> <p><i>Date you became an early career researcher.</i></p>	Click here to enter a date.
<p><b>Junior clinical academic who has not gained Certificate of completion of Training by 31 July 2020.</b></p>	Tick here <input type="checkbox"/>
<p><b>Career break or secondment outside of the HE sector.</b></p> <p><i>Dates and durations in months.</i></p>	Click here to enter dates and durations.
<p><b>Family-related leave;</b></p> <ul style="list-style-type: none"> <li>• statutory maternity leave</li> <li>• statutory adoption leave</li> <li>• Additional paternity or adoption leave or shared parental leave lasting for four months or more.</li> </ul> <p><i>For each period of leave, state the nature of the leave taken and the dates and durations in months.</i></p>	Click here to enter dates and durations.
<p><b>Disability (including chronic conditions)</b></p> <p><i>To include: Nature / name of condition, periods of absence from work, and periods at work when unable to research productively. Total duration in months.</i></p>	Click here to enter text.
<p><b>Mental health condition</b></p> <p><i>To include: Nature / name of condition, periods of absence from work, and periods at work when unable to research productively. Total duration in months.</i></p>	Click here to enter text.
<p><b>Ill health or injury</b></p>	Click here to enter text.

<i>To include: Nature / name of condition, periods of absence from work, and periods at work when unable to research productively. Total duration in months.</i>	
<b>Constraints relating to family leave that fall outside of standard allowance</b>  <i>To include: Type of leave taken and brief description of additional constraints, periods of absence from work, and periods at work when unable to research productively. Total duration in months.</i>	Click here to enter text.
<b>Caring responsibilities</b>  <i>To include: Nature of responsibility, periods of absence from work, and periods at work when unable to research productively. Total duration in months.</i>	Click here to enter text.
<b>Gender reassignment</b>  <i>To include: periods of absence from work, and periods at work when unable to research productively. Total duration in months.</i>	Click here to enter text.
<b>Any other exceptional reasons e.g. bereavement.</b>  <i>To include: brief explanation of reason, periods of absence from work, and periods at work when unable to research productively. Total duration in months.</i>	Click here to enter text.

Please confirm, by ticking the box provided, that:

- The above information provided is a true and accurate description of my circumstances as of the date below
- I realise that the above information will be used for REF purposes only and will be seen by *[institution to complete details]*.
- I realise it may be necessary to share the information with the REF team, the REF Equality and Diversity Advisory Panel, and main panel chairs.

I agree

**Name:** Print name here

**Signed:** Sign or initial here

**Date:** Insert date here

I give my permission for an HR partner to contact me to discuss my circumstances, and my requirements in relation to these.

I give my permission for the details of this form to be passed on to the relevant contact within my department/faculty/centre. (Please note, if you do not give permission your department may be unable to adjust expectations and put in place appropriate support for you).

I would like to be contacted by:

Email  Insert email address

Phone  Insert contact telephone number



# London Metropolitan University REF 2021 Code of Practice

## Annex N

### Reductions for Staff Circumstances

#### Contents

Note: we have used original wording and extracts from the official REF 2021 Guidance documentation to ensure consistency in terminology.

Extract from Paragraphs 148 and 149 from [REF 2021 Guidance on Submissions](#)  
Annex L from [REF 2021 Guidance on Submissions](#)  
[Table 1 from REF 2021 Guidance on Codes of Practice](#)

Note: The following text, Annex L and Table 1 which follows have been extracted from REF 2021 Guidance documents and any references to other paragraphs refer to the relevant Guidance documents.

Extract from REF 2021 Guidance on Submissions:

### **Early career researchers**

148. ECRs are defined as members of staff who meet the definition of Category A eligible on the census date, and who started their careers as independent researchers on or after 1 August 2016. For the purposes of the REF, an individual is deemed to have started their career as an independent researcher from the point at which:

- a. they held a contract of employment of 0.2 FTE or greater, which included a primary employment function of undertaking 'research' or 'teaching and research', with any HEI or other organisation, whether in the UK or overseas, and
- b. they first met the definition of an independent researcher (paragraphs to 131 to 133).

149. The following do not meet the definition of an ECR (this list is not exhaustive):

- a. Staff who first acted as an independent researcher while at a previous employer – whether another HEI, business or other organisation in the UK or elsewhere – before 1 August 2016, with a contract of 0.2 FTE or greater.
- b. Staff who first acted as an independent researcher before 1 August 2016 and have since had a career outside of research or an extended break from their research career, before returning to research work. Career breaks outside the HE sector are included in the types of circumstances where requests for output reductions may be made (see paragraph 160).
- c. Research assistants who would not normally meet the definition of an independent researcher, as set out in paragraph 129.

### **Summary of applicable circumstances**

160. The funding bodies, advised by EDAP, have identified the following equality-related circumstances that, in isolation or together, may significantly constrain the ability of submitted staff to produce outputs or to work productively throughout the assessment period. Details of the permitted reductions are set out in Annex L:

- a. Qualifying as an ECR (on the basis set out in paragraphs 148 and 149 and Annex L).
- b. Absence from work due to secondments or career breaks outside the HE sector.
- c. Qualifying periods of family-related leave.

- d. Other circumstances that apply in UOAs 1–6, as defined in paragraphs 161 to 163.
- e. Circumstances with an equivalent effect to absence, that require a judgement about the appropriate reduction in outputs, which are:
  - i. Disability: this is defined in the ‘Guidance on codes of practice’, Table 1 under ‘Disability’.
  - ii. Ill health, injury, or mental health conditions.
  - iii. Constraints relating to pregnancy, maternity, paternity, adoption or childcare that fall outside of – or justify the reduction of further outputs in addition to – the allowances set out in Annex L.
  - iv. Other caring responsibilities (such as caring for an elderly or disabled family member).
  - v. Gender reassignment.
  - vi. Other circumstances relating to the protected characteristics listed in the ‘Guidance on codes of practice’, Table 1, or relating to activities protected by employment legislation.

## Annex L: Reductions for staff circumstances

1. Given the reduced output requirement for 2021, the tariffs for the defined reductions differ from those set in REF 2014. This is to ensure that a broadly equivalent reduction is given in the context of the submitted output pool, and to ensure that panels receive a sufficient selection of research outputs from each submitted unit upon which to base judgements about the quality of that unit's outputs.

### Early career researchers

2. ECRs are defined in the 'Guidance on submissions' (paragraph 148). Table L1 sets out the permitted reduction in outputs without penalty in the assessment that HEIs may request for ECRs who meet this definition.

**Table L1: Early career researchers: Permitted reduction in outputs**

<b>Date at which the individual first met the REF definition of an ECR:</b>	<b>Output pool may be reduced by up to:</b>
On or before 31 July 2016	0
Between 1 August 2016 and 31 July 2017 inclusive	0.5
Between 1 August 2017 and 31 July 2018 inclusive	1
On or after 1 August 2018	1.5

### Absence from work due to secondments or career breaks

3. Table L2 sets out the permitted reduction in outputs without penalty in the assessment that HEIs may request for absence from work due to secondments or career breaks outside of the HE sector, and in which the individual did not undertake academic research.

**Table L2: Secondments or career breaks: Permitted reduction in outputs**

<b>Total months absent between 1 January 2014 and 31 July 2020 due to a staff member's secondment or career break:</b>	<b>Output pool may be reduced by up to:</b>
Fewer than 12 calendar months	0
At least 12 calendar months but less than 28	0.5
At least 28 calendar months but less than 46	1
46 calendar months or more	1.5

4. The allowances in Table L2 are based on the length of the individual's absence or time away from working in HE. They are defined in terms of total months absent from work.

5. As part-time working is taken account of within the calculation for the overall number of outputs required for the unit (which is determined by multiplying the unit's FTE by 2.5), reduction requests on the basis of part-time working hours should only be made exceptionally. For example, where the FTE of a staff member late in the assessment period does not reflect their average FTE over the period as a whole.

#### Qualifying periods of family-related leave

6. The total output pool may be reduced by 0.5 for each discrete period of:

- a. Statutory maternity leave or statutory adoption leave taken substantially during the period 1 January 2014 to 31 July 2020, regardless of the length of the leave.
- b. Additional paternity or adoption leave<sup>1</sup>, or shared parental leave<sup>2</sup> lasting for four months or more, taken substantially during the period 1 January 2014 to 31 July 2020.

7. This approach to reductions for qualifying periods of family-related leave is based on the funding bodies' considered judgement following consultation in the previous REF exercise that the impact of such a period of leave and the arrival of a new child into a family is generally sufficiently disruptive of an individual's research work to justify the specified reduction.

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

- a. By applying a reduction in outputs where there are additional circumstances, for example where the period of leave had an impact in combination with other factors such as ongoing childcare responsibilities.

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<sup>1</sup> 'Additional paternity or adoption leave' refers to leave of up to 26 weeks which is taken to care for a child where the person's spouse, partner or civil partner was entitled to statutory maternity leave or statutory adoption leave, and has since returned to work. The term 'additional paternity leave' is often used to describe this type of leave although it may be taken by parents of either gender. For the purposes of the REF, we refer to this leave as 'additional paternity or adoption leave'.

<sup>2</sup> 'Shared parental leave' refers to leave of up to 50 weeks which can be shared by parents having a baby or adopting a child. This can be taken in blocks, or all in one go.

- b. By combining the number of months for shorter periods of such leave in combination with other circumstances, according to Table L2.

9. Any period of maternity, adoption, paternity or shared parental leave that qualifies for the reduction of an output under the provisions in paragraph 6 above may in individual cases be associated with prolonged constraints on work that justify more than the defined reduction set out. In such cases, the circumstances should be explained in the request.

#### Combining circumstances

10. Where individuals have had a combination of circumstances that have a defined reduction in outputs, these may be accumulated up to a maximum reduction of 1.5 outputs. For each circumstance, the relevant reduction should be applied and added together to calculate the total maximum reduction.

11. Where Table L1 is combined with Table L2, the period of time since 1 January 2014 up until the individual met the definition of an ECR should be calculated in months, and Table L2 should be applied.

12. When combining circumstances, only one circumstance should be taken into account for any period of time during which they took place simultaneously.

13. Where an individual has a combination of circumstances with a defined reduction in outputs **and** additional circumstances that require a judgement, the institution should explain this in the reduction request so that a single judgement can be made about the appropriate reduction in outputs, taking into account all the circumstances. The circumstances with a defined reduction in outputs to be requested should be calculated according to the guidance above (paragraphs 2 to 10).

#### Other circumstances that apply in UOAs 1–6

14. In UOAs 1–6, the number of outputs may be reduced by up to one, without penalty in the assessment, for Category A submitted staff who are junior clinical academics. These are defined as clinically qualified academics who are still completing their clinical training in medicine or dentistry and have not gained a Certificate of Completion of Training (CCT) or its equivalent prior to 31 July 2020.

15. This allowance is made on the basis that the staff concerned are normally significantly constrained in the time they have available to undertake research during the assessment period. Where the individual meets the criteria in paragraph 14, and has had significant additional

circumstances – for any of the other reasons set out in the ‘Guidance on submissions’ in paragraph 160 – the institution can make a case for further reductions in the unit reduction request.

Circumstances requiring a judgement about reductions

16. Where staff have had other circumstances during the period (see paragraph 160e. in this ‘Guidance on submissions’ document) – including in combination with any circumstances with a defined reduction in outputs – the institution will need to make a judgement about the effect of the circumstances in terms of the equivalent period of time absent, apply the reductions as set out in Table L2 by analogy, and provide a brief rationale for this judgement.”

**Table 1: Summary of equality legislation**

<p><b>Age</b></p>	<p>All employees within the HE sector are protected from unlawful age discrimination, harassment and victimisation in employment under the Equality Act 2010 and the Employment Equality (Age) Regulations (Northern Ireland) 2006. Individuals are also protected if they are perceived to be or if they are associated with a person of a particular age group.</p> <p>Age discrimination can occur when people of a particular age group are treated less favourably than people in other age groups. An age group could be, for example, people of the same age, the under 30s or people aged 45-50. A person can belong to a number of different age groups.</p> <p>Age discrimination will not be unlawful if it is a proportionate means of achieving a legitimate aim. However, in the context of the REF, the view of the funding bodies is that if a researcher produces excellent research an HEI will not be able to justify not selecting their outputs because of their age group.</p> <p>It is important to note that early career researchers (ECRs) are likely to come from a range of age groups. The definition of ECR used in the REF (see 'Guidance on submissions', paragraphs 148 to 149) is not limited to young people.</p> <p>HEIs should also note that, given developments in equalities law in the UK and Europe, the default retirement age has been abolished from 1 October 2011 in England, Scotland, Wales and Northern Ireland.</p>
<p><b>Disability</b></p>	<p>The Equality Act 2010, the Disability Discrimination Act (1995) (Northern Ireland only) and the Disability Discrimination (Northern Ireland) Order 2006 prevent unlawful discrimination, victimisation and harassment relating to disability. Individuals are also protected if they are perceived to have a disability or if they are associated with a person who has a disability (for example, if they are responsible for caring for a family member with a disability).</p> <p>A person is considered to have a disability if they have or have had a physical and/or mental impairment which has 'a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities'. Long-term impairments include those that last or are likely to last for at least 12 months.</p> <p>Cancer, HIV, multiple sclerosis and progressive/degenerative conditions are disabilities too, even if they do not currently have an adverse effect on the carrying out of day-to-day activities. An impairment which is managed by medication or medical treatment, but which would have had a substantial and long-term adverse effect if not so managed, is also a disability.</p> <p>The definition of disability is different in Northern Ireland in that a list of day-to-day activities is referred to.</p>



	<p>There is no list of day-to-day activities for England, Scotland and Wales but day-to-day activities are taken to mean activities that people generally, not a specific individual, carry out on a daily or frequent basis.</p> <p>While there is no definitive list of what is considered a disability, it covers a wide range of impairments including:</p> <ul style="list-style-type: none"> <li>• sensory impairments</li> <li>• impairments with fluctuating or recurring effects such as rheumatoid arthritis, depression and epilepsy</li> <li>• progressive impairments, such as motor neurone disease, muscular dystrophy, HIV and cancer</li> <li>• organ specific impairments, including respiratory conditions and cardiovascular diseases</li> <li>• developmental impairments, such as autistic spectrum disorders and dyslexia</li> <li>• mental health conditions such as depression and eating disorders</li> <li>• impairments caused by injury to the body or brain.</li> </ul> <p>It is important for HEIs to note that people who have had a past disability are also protected from discrimination, victimisation and harassment because of disability.</p> <p>Equality law requires HEIs to anticipate the needs of people with disabilities and make reasonable adjustments for them. Failure to make a reasonable adjustment constitutes discrimination. If a researcher's impairment has affected the quantity of their research outputs, the submitting unit may return a reduced number of outputs (see 'Guidance on submissions', Part 3, Section 1, 'Staff circumstances').</p>
<p><b>Gender reassignment</b></p>	<p>The Equality Act 2010 and the Sex Discrimination (Gender Reassignment) Regulations (Northern Ireland) 1999 protect from discrimination, harassment and victimisation of trans people who have proposed, started or completed a process to change their sex. Staff in HE do not have to be under medical supervision to be afforded protection because they are trans and staff are protected if they are perceived to be undergoing or have undergone related procedures. They are also protected if they are associated with someone who has proposed, is undergoing or has undergone gender reassignment.</p> <p>Trans people who undergo gender reassignment will need to take time off for appointments and, in some cases, for medical assistance. The transition process is lengthy, often taking several years, and it is likely to be a difficult period for the trans person as they seek recognition of their new gender from their family, friends, employer and society as a whole.</p> <p>The Gender Recognition Act 2004 gave enhanced privacy rights to trans people who undergo gender reassignment. A person acting in an official capacity who acquires information about a person's status as a transsexual</p>

	<p>may commit a criminal offence if they pass the information to a third party without consent.</p> <p>Consequently, staff within HEIs with responsibility for REF submissions must ensure that the information they receive about gender reassignment is treated with particular care.</p> <p>If a staff member's ability to work productively throughout the REF assessment period has been constrained due to gender reassignment, the unit may return a reduced number of research outputs (see 'Guidance on submissions', Part 3, Section 1, 'Staff circumstances'). Information about the member of staff will be kept confidential as described in 'Guidance on submissions', paragraph 195.</p> <p>HEIs should note that the Scottish government recently consulted on, and the UK government is currently consulting on, reform of the Gender Recognition Act 2004, which may include streamlining the procedure to legally change gender.</p>
<p><b>Marriage and civil partnership</b></p>	<p>Under the Equality Act 2010 and the Sex Discrimination (Northern Ireland) Order 1976 as amended, individuals are protected from unlawful discrimination, harassment and victimisation on the grounds of marriage and civil partnership status. The protection from discrimination is to ensure that people who are married or in a civil partnership receive the same benefits and treatment in employment. The protection from discrimination does not apply to single people.</p> <p>HEIs must ensure that their procedures and decision-making processes in relation to REF 2021 do not inadvertently discriminate against staff who are married or in civil partnerships.</p>
<p><b>Political opinion</b></p>	<p>The Fair Employment and Treatment (Northern Ireland) Order 1998 protects staff from unlawful discrimination on the grounds of political opinion.</p> <p>HEIs must ensure that their procedures and decision-making processes in relation to REF 2021 do not inadvertently discriminate against staff based on their political opinion.</p>
<p><b>Pregnancy and maternity</b></p>	<p>Under the Equality Act 2010 and the Sex Discrimination (Northern Ireland) Order 1976 women are protected from unlawful discrimination, harassment and victimisation related to pregnancy and maternity.</p> <p>Consequently, where researchers have taken time out of work, or their ability to work productively throughout the assessment period has been affected, because of pregnancy and/or maternity, the submitting unit may return a reduced number of research outputs, as set out in 'Guidance on submissions', paragraphs 169 to 172.</p> <p>In addition, HEIs should ensure that female researchers who are pregnant or on maternity leave are kept informed about and included in their submissions process.</p>

	<p>For the purposes of this summary it is important to note that primary adopters have similar entitlements to women on maternity leave.</p>
<b>Race</b>	<p>The Equality Act 2010 and the Race Relations (Northern Ireland) Order 1997 protect HEI staff from unlawful discrimination, harassment and victimisation connected to race. The definition of race includes colour, ethnic or national origins or nationality. Individuals are also protected if they are perceived to be or are associated with a person of a particular race.</p> <p>HEIs must ensure that their procedures and decision-making processes in relation to REF 2021 do not discriminate against staff based on their race or assumed race (for example, based on their name).</p>
<b>Religion and belief including non-belief</b>	<p>The Equality Act 2010 and the Fair Employment and Treatment (Northern Ireland) Order 1998 protect HEI staff from unlawful discrimination, harassment and victimisation related to religion or belief. Individuals are also protected if they are perceived to be or are associated with a person of a particular religion or belief.</p> <p>HEIs must ensure that their procedures and decision-making processes in relation to REF 2021 do not discriminate against staff based on their actual or perceived religion or belief, including non-belief. 'Belief' includes any structured philosophical belief with clear values that has an effect on how its adherents conduct their lives.</p>
<b>Sex (including breastfeeding and additional paternity and adoption leave)</b>	<p>The Equality Act 2010 and the Sex Discrimination (Northern Ireland) Order 1976 protect HEI staff from unlawful discrimination, harassment and victimisation related to sex. Employees are also protected because of their perceived sex or because of their association with someone of a particular sex.</p> <p>The sex discrimination provisions of the Equality Act explicitly protect women from less favourable treatment because they are breastfeeding. Consequently, the impact of breastfeeding on a woman's ability to work productively will be taken into account, as set out in 'Guidance on submissions', Part 3, Section 1, 'Staff circumstances'.</p> <p>If a mother who meets the continuity of employment test wishes to return to work early or shorten her maternity leave/pay, she will be entitled to shared parental leave with the father or her partner within the first year of the baby's birth. Partners may also be eligible for shared parental leave or pay. Fathers/partners who take additional paternity or adoption leave will have similar entitlements to women on maternity leave and barriers that exist to taking the leave, or as a result of having taken it, could constitute unlawful sex discrimination. Consequently, where researchers have taken additional paternity and adoption leave, the submitting unit may return a reduced number of outputs, as set out in 'Guidance on submissions', Annex L.</p> <p>HEIs need to be wary of implementing procedures and decision-making processes in relation to REF 2021 that would be easier for men to comply with than women, or vice versa. There are many cases where a requirement</p>

	<p>to work full-time (or less favourable treatment of people working part-time or flexibly) has been held to discriminate unlawfully against women.</p> <p>HEIs should note that there are now requirements under UK and Scottish legislation for public authorities (including HEIs) to report information on the percentage difference amongst employees between men and women's average hourly pay (excluding overtime).</p>
<b>Sexual orientation</b>	<p>The Equality Act 2010 and the Employment Equality (Sexual Orientation) Regulations (Northern Ireland) 2003 protect HEI staff from unlawful discrimination, harassment and victimisation related to sexual orientation. Individuals are also protected if they are perceived to be or are associated with a person who is of a particular sexual orientation.</p> <p>HEIs must ensure that their procedures and decision-making processes in relation to REF 2021 do not discriminate against staff based on their actual or perceived sexual orientation.</p>
<b>Welsh language</b>	<p>The Welsh Language Act 1993 places a duty on public bodies in Wales to treat Welsh and English on an equal basis. This is reinforced by the provisions of the Welsh Language (Wales) Measure 2011 and the Welsh Language Standards (No 6) Regulations 2017.</p> <p>The arrangements for the assessment of outputs in the medium of Welsh by the REF panels are set out in 'Guidance on submissions', paragraphs 284 and 285.</p>

## Annex O

### Appeals Form Template

Your appeal will be collated by the PVC Research, but the panel assessing individuals' cases will be chaired by the DVC, the APVC for Attainment, Equity and Inclusion and the Head of the Centre for Professional Educational Development.

#### 1. Individual details

**Name**

**Job Title**

**School**

#### 2. Reason for appeal

- Identification of staff with significant responsibility with research was not carried out in accordance with the university's REF 2021 Code of Practice
- Identification of staff as not Research Independent
- Declaration of individual staff circumstances has not been considered or decided on in accordance with the university's REF 2021 Code of Practice
- Selection of outputs has not been carried out in accordance with the university's REF 2021 Code of Practice
- Other (please provide details in section 3 below)

#### 3. Details of appeal

Please provide detailed information in support of your appeal. A separate sheet may be used and supporting documentation appended if required.

#### 4. Statement of appeal

By submitting this form I confirm that I wish to lodge a formal appeal for determination in accordance with the university's REF 2021 Code of Practice

Signed:

Date:

Please submit this form to the Pro Vice-Chancellor for Research and Knowledge Exchange, Professor Don MacRaid at [d.macrauld@londonmet.ac.uk](mailto:d.macrauld@londonmet.ac.uk)

## Annex P

### Model REF Data Collection Statements for HEIs

Updated: August 2019, February 2020 and July 2020.

#### Model Staff Data Collection Statement for the REF 2021

The purpose of the Research Excellence Framework 2021 (REF 2021) is to assess the quality of UK research and to inform the selective distribution of public funds for research by the four UK higher education funding bodies. The REF is managed by the REF team, based at Research England (RE), on behalf of the four UK higher education funding bodies. RE is part of UK Research and Innovation (UKRI), and under this arrangement UKRI has the role of 'data controller' for personal data submitted by us to the REF.

If you are a researcher who has been included as part of our submission to the REF 2021, in 2021 we will send some of the information we hold about you to UKRI for the purpose of the REF 2021. The information will not be in coded form and your name and details such as your date of birth, Open Researcher and Contributor ID (ORCID), research groups, and contract dates will be provided along with details of your research. If you have declared individual circumstances and a request is made to allow a reduction in the number of outputs submitted, without penalty, some details of your personal circumstances will be provided.

You can find further information about what data are being collected on the REF website, at [www.ref.ac.uk](http://www.ref.ac.uk) in particular publication 2019/01, 'Guidance on submissions'.

#### Sharing information about you

UKRI may pass your data, or parts of it, to any of the following organisations that need it to inform the selective distribution of public funds for research and to carry out their statutory functions connected with funding higher education:

- Department for the Economy, Northern Ireland (DfE)
- Higher Education Funding Council for Wales (HEFCW)
- Scottish Funding Council (SFC).

Some of your data (Unit of Assessment, HESA staff identifier code and date of birth) will also be passed to the Higher Education Statistics Agency (HESA) to enable it to verify coded data returned to it as part of our HESA staff return (see [www.hesa.ac.uk](http://www.hesa.ac.uk)). Data returned to the REF will be linked to that held on the HESA staff record to allow UKRI and the organisations listed above to conduct additional analysis into the REF and fulfil their statutory duties under the Equality Act 2010 (England, Wales and Scotland) or the Northern Ireland Act 1998 (Northern Ireland).

UKRI and the organisations listed above will use the information to analyse and monitor the REF 2021. This may result in information being released to other users including academic researchers or consultants (commissioned by the funding bodies), to carry out research or analysis, in accordance with the Data Protection Act 2018 and the General Data Protection

Regulation (GDPR) (Regulation (EU) 2016/679). Where information not previously published is released to third parties, this will be anonymised where practicable.

UKRI will require that anyone who has access to your data, held in UKRI's records, paper or electronic, will respect its confidentiality and will only process it in accordance with instructions issued for the purposes specified by UKRI.

Parts of your data will be passed to the REF expert panels and the Equality and Diversity Advisory Panel (whose members are independent of UKRI) for the purpose of conducting a systematic evaluation of submissions, in accordance with predetermined criteria and methods. Panels will make judgments about the material contained in submissions and will not form quality judgments about individuals. All panel members are bound by confidentiality arrangements.

### **Publishing information about your part in our submission**

The results of the assessment exercise will be published by UKRI, on behalf of the four UK higher education funding bodies, in April 2022. The published results will not be based on individual performance nor identify individuals.

Those parts of submissions that contain factual data and textual information about research activity will also be published by UKRI, on behalf of the four UK higher education funding bodies, and will be made available online. Published information is likely to include **textual information including impact case studies in which you may be referenced**. Your name, job title and periods of employment may be included in this textual information. Other personal and contractual details, including your date of birth and all information about individual staff circumstances will be removed. [*Guidance to HEIs: Note that impact case studies, environment statements and other textual information should not normally be submitted with personal information (other than names and job titles), and that usually any personal information (other than names and job titles) should be removed in the redacted version(s) that are submitted. You should include here any further clarifications based on your redaction process.*]

Unless redacted, the information to be published by UKRI, on behalf of the four UK higher education funding bodies, will include a single list of all the outputs submitted by us in each Unit of assessment. The list of outputs will include standard bibliographic data for each output, but will not be listed by author name.

### **Data about personal circumstances**

You may voluntarily declare personal circumstances to your submitting unit, which could permit us to submit your information to the REF without the 'minimum of one' output requirement (without penalty), or to submit a reduced number of outputs without penalty. If (and only if) we apply either form of reduction of outputs, we will need to provide UKRI with individual-level data that you have declared about your individual circumstances, to show that the criteria have been met for reducing the number of outputs. Please see the 'Guidance on submissions' document (paragraphs 151-201) for more detail about reductions in outputs and what information needs to be submitted. London Met's procedures

for disclosing circumstances is described in our [Code of Practice](#) and staff have been, or will be, invited to disclose personal circumstances at the time they are written to confirming that they will be returned to the REF.

Submitted data will be kept confidential to the REF team, the Equalities and Diversity Advisory Panel, and main panel chairs. All these bodies are subject to confidentiality arrangements. Details of personal circumstances submitted by staff will be stored in a folder on London Met's BOX cloud server. Anonymised details of circumstances will only be shared with our REF Equality, Diversity and Inclusion Panel (REFEDIP) for the purposes of determining whether a reduction in the number of outputs should be requested in our REF submission. The outcome of the REFEDIP's determination will be shared, without any personal information, with the Unit of Assessment Panels. The REF team will destroy the submitted data about individuals' circumstances on completion of the assessment phase.

We will send to Research England a report that will include a summary of all voluntarily declared personal circumstances, whether or not they were used to reduce the output requirements. This report will only contain data in aggregated form and will not contain information that will identify individual members of staff.

### **Accessing your personal data**

Under the Data Protection Act 2018 and the GDPR, you have the right to request a copy of any personal information that UKRI holds about you. Further information about the Act and GDPR, and guidance on making a subject access request, can be found on the RE website at <https://re.ukri.org/about-us/policies-standards/foi-data-protection/>

If you have any concerns about your information being used for these purposes, please contact:

Data Protection Officer  
UK Research and Innovation  
Polaris House  
Swindon, SN2 1FL

Email: [dataprotection@ukri.org](mailto:dataprotection@ukri.org)

**London Metropolitan University's Privacy Policy can be found at:**

<https://www.londonmet.ac.uk/site-information/privacy-policy/>



# Model Data Collection Statement for the REF 2021 – Non-Staff

## About the REF

The purpose of the Research Excellence Framework 2021 (REF 2021) is to assess the quality of UK research and to inform the selective distribution of public funds for research by the four UK higher education funding bodies. The REF outcomes are used to calculate about £2 billion per year of public funding for universities' research, and affect their international reputations. The results also inform strategic decisions about national research priorities. The next REF will be undertaken in 2021.

The REF was first carried out in 2014, replacing the previous Research Assessment Exercise. It included for the first time an assessment of the broader impact of universities' research beyond academia: on the economy, society, culture, public policy and services, health, the environment and quality of life – within the UK and internationally.

Impact is assessed through the submission of case studies, which describe the changes or benefits brought about by research undertaken by researchers at the institution. Impressive impacts were found across all disciplines, with 44 per cent of submissions judged to be outstanding. A database of case studies submitted in 2014 can be found here: <https://impact.ref.ac.uk/>.

## Data collection

The REF is managed by the REF team, based at Research England (RE), on behalf of the four UK higher education funding bodies. RE is part of UK Research and Innovation (UKRI), and under this arrangement UKRI has the role of 'data controller' for personal data submitted by us to the REF.

You may have provided information for one or more impact case studies or environment statements as part of our submission to the REF 2021. In 2021 we will send information about impact case studies and environment statements to UKRI for the purpose of the REF 2021. The information will not be in coded form and your name - and details such as your job title and organisational affiliation - may be provided in these narrative statements. We refer to this information about you as 'your data'.

You can find further information about what data are being collected on the REF website, at [www.ref.ac.uk](http://www.ref.ac.uk) in particular publication 2019/01, 'Guidance on submissions'. Annex G of that document sets out the data that we will be required to share with UKRI.

## Sharing information about you

UKRI may pass your data, or parts of it, to any of the following organisations that need it to inform the selective distribution of public funds for research and to carry out their statutory functions connected with funding higher education:

- Department for the Economy, Northern Ireland (DfE)
- Higher Education Funding Council for Wales (HEFCW)
- Scottish Funding Council (SFC).

UKRI and the organisations listed above will use the information to analyse and monitor the REF 2021. This may result in information being released to other users including academic researchers or consultants (commissioned by the funding bodies), to carry out research or analysis, in accordance with the Data Protection Act 2018 and the General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679). Where information not previously published is released to third parties, this will be anonymised where practicable.

UKRI will require that anyone who has access to your data, held in UKRI's records, paper or electronic, will respect its confidentiality and will only process it in accordance with instructions issued for the purposes specified by UKRI.

Parts of your data will be passed to the REF expert panels and the Equality and Diversity Advisory Panel (whose members are independent of UKRI) for the purpose of conducting a systematic evaluation of submissions, in accordance with predetermined criteria and methods. All panel members are bound by confidentiality arrangements.

### **Publishing information about your part in our submission**

The results of the assessment exercise will be published by UKRI, on behalf of the four UK higher education funding bodies, in April 2022.

Those parts of submissions that contain factual data and textual information about research activity will also be published by UKRI, on behalf of the four UK higher education funding bodies, and will be made available online. Published information is likely to include **textual information including impact case studies in which you may be referenced**. Your name and job title may be included in this textual information. Other personal details will normally be removed. Where the content of the impact case study is deemed to be commercially sensitive or confidential, a redacted version may be published. Written requests for a redacted version of the impact case study should be submitted to the author of the impact case study and passed on to the University's Impact Manager. An un-redacted version of the impact case study will be submitted as part of our REF2021 submission and this version will be shared with the assessment panel.

### **Accessing your personal data**

Under the Data Protection Act 2018 and the GDPR, you have the right to request a copy of any personal information that UKRI holds about you. Further information about the Act and GDPR, and guidance on making a subject access request, can be found on the RE website at <https://re.ukri.org/about-us/policies-standards/foi-data-protection/>

If you have any concerns about your information being used for these purposes, please contact:

Data Protection Officer  
UK Research and Innovation  
Polaris House  
Swindon, SN2 1FL

Email: [dataprotection@ukri.org](mailto:dataprotection@ukri.org)

Please see below a link to London Metropolitan University's Privacy Notice:  
<https://www.londonmet.ac.uk/site-information/privacy-policy/>

## Annex Q Equality Impact Assessment

### REF 2021 Due Regard Assessment

Initial assessment completed February 2019

Updated 21<sup>st</sup> May 2019 at Consultation stage

<p><b>1. Decision / Action Implementation Review</b></p>	<p>The fair and transparent identification of staff with significant responsibility for research; determining who is an independent researcher; and the selection of outputs, including approaches to supporting staff with circumstances when preparing submissions to the REF, the details of which will be set out and published in our code of practice.</p>
<p><b>2. Aims - why are you doing it?</b></p>	<p>Each institution making a REF submission in 2020 is required to develop, document and apply a code of practice on the fair and transparent identification of staff with significant responsibility for research (where a higher education institute (HEI) is not submitting 100 per cent of Category A eligible staff); determining who is an independent researcher; and the selection of outputs, including approaches to supporting staff with circumstances.</p> <p>Both as employers and public bodies, HEIs need to ensure that their REF 2021 procedures do not discriminate unlawfully against, or otherwise have the effect of harassing or victimising individuals because of age, disability, gender identity, marriage and civil partnership, race, religion or belief, sex or sexual orientation or because they are pregnant or have recently given birth.</p>

Please complete this matrix to show areas where you feel there could be an impact

Key for completing Matrix. Please note that it is possible to have both a positive and negative impact. NI - Negative Impact PI - Positive Impact No - No impact DK - Don't Know N/A - Not Applicable Only for areas noted in table

	See Support Notes for further detail	Age	Disability	Gender	Gender reassignment	Pregnancy/ maternity	Race	Religion or belief	Sexual orientation	Marriage / civil partnership (employment only)
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<b>Eliminate unlawful discrimination</b>	Eliminate unlawful discrimination harassment, victimisation and any other conduct prohibited by the Act	No	No	No	No	No	No	DK	DK	DK
<b>Advance equality of opportunity</b>	Remove or minimise disadvantages suffered by people due to their protected characteristics;	No	No	No	No	No	No	DK	DK	DK
	Meet the needs of people with protected characteristics	No	No	No	No	No	No	DK	DK	DK
	Encourage people with protected characteristics to participate in learning and teaching and general University life or in other activities where their participation is low.	PI	PI	PI	PI	PI	PI	DK	DK	DK
<b>Foster good relations</b>	Tackle prejudice between people who share a protected characteristic and others.	No	No	No	No	No	No	DK	DK	DK
	Promote understanding between people who share a protected characteristic and others.	No	No	No	No	No	No	DK	DK	DK

<b>4. Did the matrix above identify any negative or positive impact effect on any of the protected characteristics?</b>	Yes.
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<b>5. List what the effects are.</b>	Clear principles of fair selection set out in a published and widely disseminated code of practice that is applied fairly, consistently and transparently is intended to encourage all staff including those with protected characteristics to participate on an equal footing in research.
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<b>6. What actions need to be taken to mitigate negative impact?</b>	Fair and transparent selection processes will be based on relevant objective person specification or role criteria.
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<b>Name and job title person completing form:</b>	Robert Fisher Human Resources Director
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<b>Approving manager signature:</b>	Electronic
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<b>Date:</b>	21 May 2019
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## REF 2021 Due Regard Assessment

Initial assessment completed February 2019

Reviewed August 2019

<p><b>1. Decision / Action Implementation Review</b></p>	<p>The fair and transparent identification of staff with significant responsibility for research; determining who is an independent researcher; and the selection of outputs, including approaches to supporting staff with circumstances when preparing submissions to the REF, the details of which will be set out and published in our code of practice.</p>
<p><b>2. Aims - why are you doing it?</b></p>	<p>Each institution making a REF submission in 2020 is required to develop, document and apply a code of practice on the fair and transparent identification of staff with significant responsibility for research (where a higher education institute (HEI) is not submitting 100 per cent of Category A eligible staff); determining who is an independent researcher; and the selection of outputs, including approaches to supporting staff with circumstances.</p> <p>Both as employers and public bodies, HEIs need to ensure that their REF 2020 procedures do not discriminate unlawfully against, or otherwise have the effect of harassing or victimising individuals because of age, disability, gender identity, marriage and civil partnership, race, religion or belief, sex or sexual orientation or because they are pregnant or have recently given birth.</p>
<p><b>3. What information have you used to inform your decision/ action?</b>  <b>Examples:</b> Student data, Staff data, Consultation / feedback, Research / general knowledge, Advice</p>	<p>Workforce data for all staff with a contract of at least 0.2 FTE and with a contract that was defined in HESA terms as “teaching”, or “teaching and research”. Initial data taken on 28/2/19.</p> <p>Guidance on submissions’ (REF 2019/01)</p> <p>Guidance on codes of practice (REF 2019/03)</p> <p>London Metropolitan University Code of Practice on the Selection of Staff for the Research Excellence Framework (2014)</p> <p>Initial draft identification criteria for staff with SRR and potential resultant SRR staff profile.</p>

Please complete this matrix to show areas where you feel there could be an impact

Key for completing Matrix. Please note that it is possible to have both a positive and negative impact. NI - Negative Impact PI - Positive Impact No - No impact DK - Don't Know N/A - Not Applicable Only for areas noted in table

	See Support Notes for further detail	Age	Disability	Gender	Gender reassignment	Pregnancy/ maternity	Race	Religion or belief	Sexual orientation	Marriage / civil partnership (employment only)
<b>Eliminate unlawful discrimination</b>	Eliminate unlawful discrimination harassment, victimisation and any other conduct prohibited by the Act	No	No	No	No	No	No	DK	DK	DK
<b>Advance equality of opportunity</b>	Remove or minimise disadvantages suffered by people due to their protected characteristics;	No	No	No	No	No	No	DK	DK	DK
	Meet the needs of people with protected characteristics	No	No	No	No	No	No	DK	DK	DK
	Encourage people with protected characteristics to participate in learning and teaching and general University life or in other activities where their participation is low.	PI	PI	PI	PI	PI	PI	DK	DK	DK



<b>Foster good relations</b>	Tackle prejudice between people who share a protected characteristic and others.	No	No	No	No	No	No	DK	DK	DK
	Promote understanding between people who share a protected characteristic and others.	No	No	No	No	No	No	DK	DK	DK

<b>4. Did the matrix above identify any negative or positive impact effect on any of the protected characteristics?</b>	Yes.
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<b>5. List what the effects are.</b>	Clear principles of fair identification set out in a published and widely disseminated code of practice that is applied fairly, consistently and transparently is intended to encourage all staff including those with protected characteristics to participate on an equal footing in research.
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<b>6. What actions need to be taken to mitigate negative impact?</b>	Fair and transparent identification processes will be based on relevant objective person specification or role criteria.
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<b>Name and job title person completing form:</b>	Robert Fisher Director of Human Resources
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<b>Name and job title of approving manager (<i>if different</i>):</b>	
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<b>Approving manager signature:</b>	Electronic
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<b>Date:</b>	Last updated 29/8/2019
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## REF 2021 Due Regard Assessment

Initial assessment completed February 2019

Reviewed August 2019

Reviewed September 2019

<p><b>1. Decision / Action Implementation Review</b></p>	<p>The fair and transparent identification of staff with significant responsibility for research; determining who is an independent researcher; and the selection of outputs, including approaches to supporting staff with circumstances when preparing submissions to the REF, the details of which will be set out and published in our code of practice.</p>
<p><b>2. Aims - why are you doing it?</b></p>	<p>Each institution making a REF submission in 2020 is required to develop, document and apply a code of practice on the fair and transparent identification of staff with significant responsibility for research (where a higher education institute (HEI) is not submitting 100 per cent of Category A eligible staff); determining who is an independent researcher; and the selection of outputs, including approaches to supporting staff with circumstances.</p> <p>Both as employers and public bodies, HEIs need to ensure that their REF 2020 procedures do not discriminate unlawfully against, or otherwise have the effect of harassing or victimising individuals because of age, disability, gender identity, marriage and civil partnership, race, religion or belief, sex or sexual orientation or because they are pregnant or have recently given birth.</p>
<p><b>3. What information have you used to inform your decision/ action?</b>  <b>Examples:</b> Student data, Staff data, Consultation / feedback, Research / general knowledge, Advice</p>	<p>Workforce data for all staff with a contract of at least 0.2 FTE and with a contract that was defined in HESA terms as “teaching”, or “teaching and research”. Initial data taken on 28/2/19.</p> <p>Guidance on submissions’ (REF 2019/01)</p> <p>Guidance on codes of practice (REF 2019/03)</p> <p>London Metropolitan University Code of Practice on the Selection of Staff for the Research Excellence Framework (2014)</p> <p>The draft SRR identification criteria and consultation process.</p> <p>Further analysis of staff who could be identified as having SRR based on the draft selection criteria and comparison against the profile of the full academic staff group.</p>

Please complete this matrix to show areas where you feel there could be an impact

Key for completing Matrix. Please note that it is possible to have both a positive and negative impact. NI - Negative Impact PI - Positive Impact No - No impact DK - Don't Know N/A - Not Applicable Only for areas noted in table

	See Support Notes for further detail	Age	Disability	Gender	Gender reassignment	Pregnancy/ maternity	Race	Religion or belief	Sexual orientation	Marriage / civil partnership (employment only)
<b>Eliminate unlawful discrimination</b>	Eliminate unlawful discrimination harassment, victimisation and any other conduct prohibited by the Act	No	No	No	No	No	No	DK	DK	DK
<b>Advance equality of opportunity</b>	Remove or minimise disadvantages suffered by people due to their protected characteristics;	NI & PI (See Note1)	PI (+4%)	NI (-7%)	DK	DK	NI (-14%)	DK	DK	DK
	Meet the needs of people with protected characteristics	No	No	No	No	No	No	DK	DK	DK
	Encourage people with protected characteristics to participate in learning and teaching and general University life or in other activities where their participation is low.	PI	PI	PI	PI	PI	PI	DK	DK	DK

<b>Foster good relations</b>	Tackle prejudice between people who share a protected characteristic and others.	No	No	No	No	No	No	DK	DK	DK
	Promote understanding between people who share a protected characteristic and others.	No	No	No	No	No	No	DK	DK	DK

<b>4. Did the matrix above identify any negative or positive impact effect on any of the protected characteristics?</b>	<p>Yes.</p> <p>Note 1: Age group 26 – 50 has 9% lower representation; Age groups 51 to 65 and over 65 both have higher representation (of 2% and 4%)</p>
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<b>5. List what the effects are.</b>	<p>Clear principles of fair identification set out in a published and widely disseminated code of practice that is applied fairly, consistently and transparently is intended to encourage all staff including those with protected characteristics to participate on an equal footing in research.</p>
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<b>6. What actions need to be taken to mitigate negative impact?</b>	<p>Fair and transparent identification processes based on relevant objective person specification or role criteria.</p> <p>The results of this EIA are shared with the Research Office team to inform their future selection and decision making.</p>
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<b>Name and job title person completing form:</b>	Robert Fisher Director of Human Resources
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<b>Name and job title of approving manager (if different):</b>	
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<b>Approving manager signature:</b>	Electronic
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<b>Date:</b>	Last updated 17/9/2019
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## London Metropolitan University REF 2021 Code of Practice

### Annex R – Privacy Policy

About our [privacy policy](#)

As the data controller of your personal data, London Metropolitan University is subject to the General Data Protection Regulation (GDPR), effective from 25 May 2018.

This privacy notice outlines how London Metropolitan University (also referred to as "we", "us" or "our") collects, uses and shares your personal data. It also explains your rights regarding the personal data we hold. The privacy notice relates to our processing of personal data of prospective students (also referred to as "you" or "your") of London Metropolitan University for marketing purposes.

#### What personal data we collect

We may collect details such as:

- your name, email address, telephone number (and other contact details if known) as well as other details such as date of birth, postal address, residency status, nationality, ethnicity, level of study, your areas of interest, educational history, CV, personal references, passport details, visa information, criminal record declarations, and entry test and interview information if required
- personal information about disabilities and dietary requirements to help us accommodate you at events

Please note, we run a refer a friend scheme that offers current London Met students, graduates and staff members to recommend a friend to study at London Met. If you have been referred via this scheme, your friend may have provided us with some of the above information on your behalf. We will store these details to verify the referral and will send you a one-off email to inform you that you have been referred.

#### How we collect your personal data

There are numerous ways in which London Metropolitan University may collect your personal data. These include:

- when you register your interest in London Metropolitan University via our website
- when you communicate with us through our website, via email or telephone, or in person, eg when making an enquiry or requesting a prospectus
- when you share your personal data with us at an external higher education fair or event, such as those organised by third parties such as UCAS or those taking place internationally
- when you respond to one of our marketing campaigns on a third party website (including social media channels) and provide your personal data

- when you make an application to study at London Metropolitan University or one of our partner institutions, either via UCAS (the Universities and Colleges Admissions Service) or when you make a direct application to study with us

We store any data you may have provided to us as an enquirer, on your application, throughout your studies with us or at any point after graduation.

#### How we use your information

We may use your personal data for a number of reasons such as:

- marketing and recruitment – for example, we may use your personal data to send you information about London Metropolitan University, the subject area(s) you may be interested in, details about upcoming events, reminders about important deadlines, eg application deadlines, and other relevant services
- events – for example, to ensure we accommodate your requirements (eg those relating to a disability or dietary needs)
- to assess your application and create your student record (once you have applied to us)
- to provide you with career development support (once you have applied to us)

If your personal information has been provided by another person (eg via our refer a friend scheme) we will send you a one-off email to make you aware of our privacy policy.

#### How we share your information with others (our partners)

We may share some of your personal data with relevant third parties. This will be for the purposes referred to in this privacy notice. This may include disclosing limited personal data to employees, agents and contractors where there is a legitimate reason to do so, including:

- external marketing agencies, print suppliers or fulfilment houses we work with to send you relevant marketing communications
- third parties who provide us with essential software that is used to store and process your personal data. The University will only transfer personal data to the receiving organisation who has provided they have adequate safeguards.
- internal and external auditors
- organisations with an interest in tracking applicant and student progress and attendance, including student sponsors (eg the Student Loans Company and other relevant parties)
- government departments or agencies where we have a statutory obligation to provide information (eg the Higher Education Funding Council for England (HEFCE), the Office for Students (OfS), the Higher Education Statistics Agency (HESA) and the Home Office (for visa and immigration purposes)
- third parties conducting surveys for the purposes of gaining feedback about our marketing or events

#### Changes to your personal data



It is important that you tell us promptly about any changes to the information we hold about you, including your contact details. You can do this via [the contact page on our website](#).

How long your information is kept for

We do not retain your personal data for longer than is required in order to provide you with relevant information or services unless you request us to do otherwise. We may retain some information indefinitely for archive purposes and to support your lifelong relationship with London Metropolitan University.

Should you choose to stop receiving marketing communications, London Metropolitan University is obliged to opt you out within 28 days.

Your rights

The General Data Protection Regulation gives you the rights outlined below:

- to obtain access to, and copies of, the personal data that we hold about you
- to require that we stop processing your personal data on your request
- to require that we do not send you marketing communications
- to require London Metropolitan University to make corrections to the personal data that we hold about you, if this is incorrect
- to require that we erase your personal data
- to require that we restrict our data processing activities (and, where our processing is based on your consent, you may withdraw that consent, without affecting the lawfulness of our processing based on consent before its withdrawal)
- to receive from the University the personal data we hold about you, which you have provided to us, in a reasonable and intelligible format, including for the purpose of you transmitting that personal data to another data controller
- to object, on grounds relating to your particular situation, to any of our particular processing activities where you feel this has a disproportionate impact on your rights

Please note that the above rights are not absolute, and we may be entitled to refuse requests where exceptions apply.

If you have given your consent and you wish to withdraw it, please contact the University Secretary's Office using the contact details below. Please note that where our processing of your personal data relies on your consent and where you then withdraw that consent, we may not be able to provide all or some aspects of our services to you and/or it may affect the provision of those services.

This privacy statement was designed to be as clear and concise as possible – it does not provide exhaustive detail of all aspects of London Metropolitan University's collection and use of personal data.

We may update this privacy policy to reflect changes to our information practices. If we make any material changes we will notify you through the channels that you've opted into or via a notice on this website. We encourage you to periodically review this page for the latest information on our privacy practices.

We are not responsible for the practices employed by third party websites. Links to and from our website, and therefore the information or the content contained on those websites, are provided solely as reference points to allow you access information on topics that may be useful to our website users. Please note, when you use a link to go from our website to a third party website, our privacy policy will no longer apply.

#### Contact us

If you'd like to opt out of our marketing communications, please email [marketing@londonmet.ac.uk](mailto:marketing@londonmet.ac.uk) stating which channels (email, phone, text) you'd like to opt out of.

If you'd like to know more about how we process your personal information or have any questions, please contact the Data Protection Officer using the following details:

Email: [dsar@londonmet.ac.uk](mailto:dsar@londonmet.ac.uk)  
Data Protection Officer  
University Secretary's Office  
London Metropolitan University  
166-220 Holloway Road  
London  
N7 8DB

You can also use the above details to request access to the personal information we hold about you.

To find out more about your data protection rights, visit the [Information Commissioner's Office website](#). You can also contact the Information Commissioner's Office if you're not happy with the way we are processing your personal data.

This privacy policy can also be viewed on our website at <https://www.londonmet.ac.uk/site-information/privacy-policy/>