



SWANSEA UNIVERSITY

RESEARCH EXCELLENCE FRAMEWORK 2021

INSTITUTIONAL POLICY STATEMENT AND CODE OF PRACTICE

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SWANSEA UNIVERSITY

RESEARCH EXCELLENCE FRAMEWORK 2021

INSTITUTIONAL POLICY STATEMENT AND CODE OF PRACTICE

The following REF Code of Practice includes a Policy Statement, Code of Practice, and Individual Staff Circumstances form in relation to Swansea University's REF preparations and submission.

Purpose

1. Each institution 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 applicable); determining who is an independent researcher and, the selection of outputs including approaches to supporting staff with circumstances and is designed to meet the requirement of the REF "[Guidance on Submissions \(2019/01\)](#)" and "[Panel Criteria and Working Methods \(2019/02\)](#)".
2. Higher Education Institutions (HEI) need to ensure that their REF procedures do not discriminate unlawfully against, or otherwise have the effect of harassing or victimising individuals because of age, disability, gender identity, marriage and/or civil partnership, race, religion or belief, sex or sexual orientation or because they are pregnant or have recently given birth or adopted a child.
3. A Code of Practice ensures fairness, transparency, consistency, accountability and inclusivity, as is highlighted in the REF Guidance on Submissions (2019/01), to ensure that all REF processes are fair from the outset.
4. HEIs are required to submit a draft Code of Practice to the UKRI REF team **before noon 7th June 2019**. The REF Equality and Diversity Advisory Panel (EDAP) will examine the Codes of Practice and advise the UK funding bodies on their adherence to the guidance, prior to approval and publication.
5. If the EDAP advises the REF team that an institution's Code of Practice does not meet the requirements of the guidance, the four UK funding bodies will take appropriate action. Heads of institutions will be required to confirm adherence to their institution's Code of Practice when making their institution's submission.
6. There will be an opportunity for institutions to revise their Codes of Practice where the need is identified as part of the approval process. Once approved by EDAP, and by the end of 2019, Codes of Practice will be published. The Code of Practice will be effective from the point at which it is approved by EDAP.

Part 1: Introduction

POLICY STATEMENT

7. Building on Swansea University's (hereafter, the University) REF 2014 Code of Practice (available on the University's REF SharePoint site), the policies and procedures developed will inform our ongoing preparation for REF 2021, will form the basis of this document and will continue to be observed until this Code of Practice is approved and implemented.
8. The University's Code of Practice will continue to make all of the processes concerned with the REF 2021 submission, transparent. The processes, in respect of submissions, will be consistent across the Institution and this Code of Practice will set out the principles to be applied to all aspects/stages of the processes. Responsibilities will be clearly defined and the operating criteria and Terms of Reference for individuals, committees, advisory groups and any other bodies concerned with the REF will be made

readily available to all individuals and groups concerned. The existence of the Code of Practice will be well publicised throughout the institution.

9. The University's Strategic Equality Plan 2016-2020 (see Appendix 7) sets out our mission to provide an environment of research excellence that is world leading, globally collaborative and internationally recognised and to provide an inclusive institutional culture where differences are shared and valued and where discrimination is challenged and eliminated.
10. In order to achieve these aspirations we considered the needs of all recipients of higher education provision, in shaping policy, in delivering services, and in relation to our own employees. To this end our Strategic Equality Plan 2016-2020 is a key tool for leaders and managers and is a catalyst for change in the way that the University conducts its work, and the way that policy and services are designed and delivered.
11. Through consultation we defined three strategic staff equality outcomes to remove barriers and eliminate discrimination. These outcomes include:
 - The achievement of external recognition/accreditation through Athena Swan awards; Race Charter Mark awards; Stonewall Workplace Equality Index; and Disability Standard awards.
 - Fair and meritocratic appointment and promotion processes that enable the University to have a high performing workforce drawn from the widest pool of talent available.
 - The University's high performing workforce being characterised by gender equality in terms of pay, conditions and reward.
12. Equality objectives and key milestones have been set and are monitored regularly by the University Equality Committee and reported on via the University Equality Annual Report
13. The REF 2014 Equality Impact assessment recognised that negative impacts were, at times, unavoidable. However, a number of steps were highlighted to mitigate and reduce the impact of discrimination or inequality. These included:
 - Retention of the University Athena SWAN Bronze Award. In November 2017 the University was awarded the Athena SWAN Silver Award.
 - Encouraging Colleges/School/Departments to apply for their own Athena SWAN awards. We currently have 2 Colleges awarded a Silver Award, 2 Colleges and 1 Department awarded a Bronze Award with the remaining Colleges/Departments either having made applications or are in the process of making applications.
 - Tackling the persistent under representation of women in senior and leadership positions. Since 2014 the percentage of female professors at Swansea University has risen from 13% to 23%.
 - Engage with the Women in Universities Mentoring Scheme (WUMS), an innovative all-Wales scheme that aims to promote and facilitate professional development for women working in Welsh universities. Swansea University fully engaged with WUMS until the scheme closed. To continue supporting professional development we have 116 of our own internal academic promotion mentors and to date have supported 74 women through the Aurora Leadership Foundation Programme.
 - Establish a forum of female senior academic members. The "Mary Williams Group" was established and membership expanded to include senior professional services staff.
 - The University is a Race Charter Mark member working towards application, we are also in the Top 50 Employers of the Stonewall Workplace Equality Index.
14. Significant progress has been made in a number of these areas and, to ensure compliance with our EDI duties, work is ongoing to monitoring our data on these protected characteristics grounds and positive action steps if under representation is recognised.
15. Any negative impact that arose in REF 2014 as a result of the selection of staff will be totally mitigated by the requirement to submit 100% of staff with significant responsibility for research and develop impact case studies in line with the FTE submitted.
16. The following principles govern the conduct of the REF and the University's Code of Practice.

Transparency: All REF related processes will be transparent. This policy and Code of Practice will be made available and easily accessible to all academic staff across the institution, and drawn to the attention of those absent from work. Communication methods will be agreed between individuals and line managers before any planned long-term absence. Unplanned absence will be handled on an individual basis and consideration will be given to how communications with staff on leave will be handled so as to ensure that it is undertaken in a supportive and appropriate manner. This Policy and Code of practice will be made available in a variety of formats on request. There will be a programme of communication activity to disseminate the Code of Practice and explain the processes related to (a) determining who is an independent researcher and (b) the selection of outputs for submission and both of these processes will be documented in the Code of Practice. This policy and Code of Practice will be available on the University's web site, and will be included as part of the REF submission.

Consistency: The policy in respect of identifying staff as independent researchers and the selection of outputs for submission will be consistent across the University and the Code of Practice will be implemented uniformly. This policy and Code of Practice sets out the principles to be applied to all aspects/stages of the process at all levels within the University where decisions will be made.

Accountability: Responsibilities will be clearly defined, and individuals and bodies that are involved in REF processes and submissions will be identified. This policy and Code of Practice sets out the training (see appendix 2) requirements for those who are involved in the preparations for submission. Operating criteria and terms of reference for individuals, committees, advisory groups and any other bodies concerned in decision making will be set out and made available.

Equity and Inclusivity: All types of research and all forms of research output across all disciplines will be assessed on a fair and equal basis. Criteria and assessment processes will be adopted that recognise excellence in research on a comparable basis across the community. Within Units of Assessment (UoAs), members of staff involved in selecting outputs and impact case studies for REF submission will, where possible, reflect the diversity of research and researchers within those UoAs.

17. The University will:

- 17.1 Take into account the requirements and recommendations within the REF Guidance on Submissions (2019/01), to assist institutions in promoting an inclusive environment.
- 17.2 Take into account requirements based on the Equality Act 2010 and relevant employment **law including fixed term employees and part-time workers.**
- 17.3 Develop open and transparent processes for use by the University's committees/boards/groups while being mindful of ensuring that staff experience is in line with the principles, policies and procedures outlined in the Code of Practice.
- 17.4 Encourage all researchers to submit their work and make the criteria of output selection and submission sufficiently transparent.
- 17.5 Ensure that all staff in Colleges and Schools (hereafter Colleges) with a role to play in the REF process, and Senior Management involved in the REF management process, receive the University's Equality training tailored to REF processes.
- 17.6 Detail the communication channels to be used to convey the relevant information to all involved in advance of the processes taking place (see appendix 2).
- 17.7 Take account of individuals' personal circumstances in accordance with the guidance set out in the REF Guidance on Submissions (2019/1).
- 17.8 Ensure an inclusive approach towards all groups of academic staff involved in REF processes (e.g. ensure that meetings are held at times that are convenient for part-time staff and staff with caring responsibilities), and ensure that staff on extended leave (e.g. maternity or disability-related leave) are kept involved and informed.

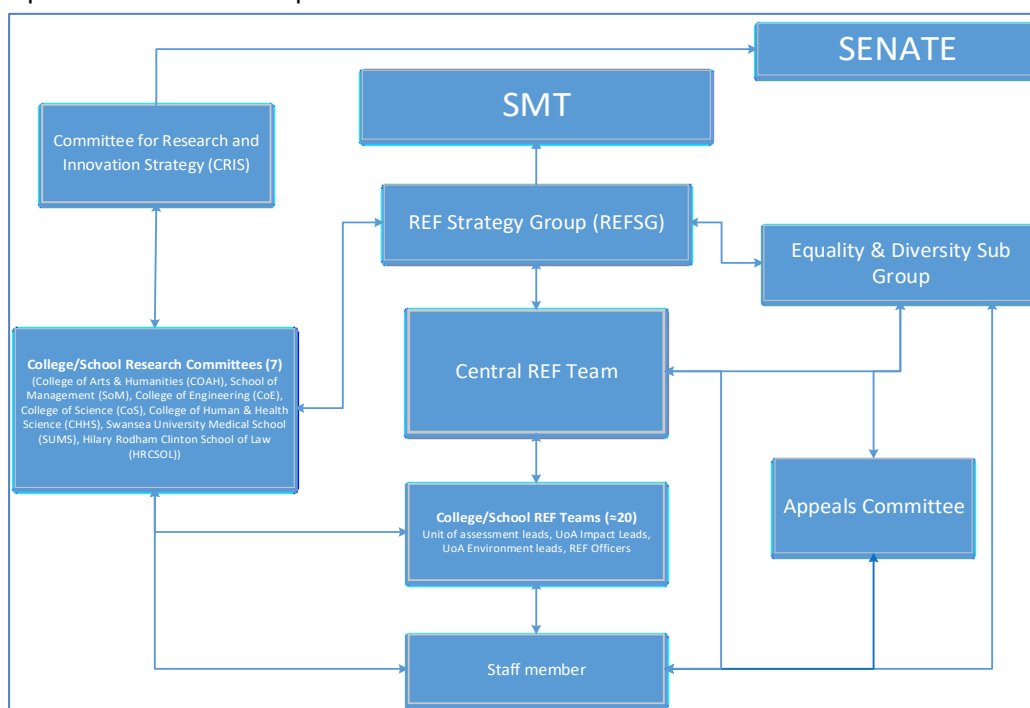
- 17.9 Ensure that preparations for REF submissions do not discriminate on the grounds of age, disability, gender, gender reassignment, marriage and civil partnership, pregnancy, maternity, adoption, race, religion and belief, sex and sexual orientation or fixed-term or part-time status. Internal Mini-REF exercises (see paragraphs 58-79) have and will continue to include equality impact assessments (EIA) as part of the process, and the implications of these will be considered when preparing the final submission. EIAs may also be undertaken at UoA level if, for example, an imbalance is encountered; appropriate considerations will then be made regarding how any barriers could be eliminated or reduced.
- 17.10 The terms of reference for any committees or groups concerned with the REF will be identified and made available on the University internal web site. Clear definitions of each person's role will be provided, including the rationale for their role, how they were selected for this role and where the role fits into the institutional management framework.
- 17.11 This Policy and Code of Practice will be published on the University's web site and there will be a programme of communication activity to disseminate them and explain the processes related to submission.
- 17.12 An open, transparent and timely appeals process will be put in place and this process will allow appeals to be considered before the final submission is made. The Code of Practice contains details of the appeals procedures (see paragraph 109).
18. The REF Guidance on Submissions (2019/01) takes into account part time working within the calculation for the overall number of outputs required for each unit. Part-time and fixed-term staff are supported via the Equality Act 2010 and relevant employment law including the University's Fixed Term Employee and Staff Employed on Fixed Term Funding Streams Policy. Fixed term and part time legislation is also explicit in key employment policies, for example recruitment and selection and academic promotion.
19. The University recognises the crucial contribution that its research staff make to its research performance. Early Career Researchers are especially important for sustaining high-quality research and the University is committed to valuing and promoting career development for this diverse group of staff.
20. The University has held the HR Excellence in Research Award since 2011. The award is reviewed by a process of assessment every 2 years. The results of the most recent assessment, carried out in February this year, are expected early summer 2019, and we anticipate renewal of our award.
21. The University also recognises the important contribution that its Research Staff make to its research output and impact, and as such is committed to providing a supportive environment in which they can thrive both personally and professionally. Through the implementation of the 2008 Concordat the University undertakes to fulfil this commitment. This applies to all staff on Research grades.
22. Principle 6 of the Concordat to support the career development of researchers ensures that diversity and equality are promoted in all aspects of the recruitment and career management of researchers. Find out more about the Concordat here: <https://www.vitae.ac.uk/policy/concordat-to-support-the-career-development-of-researchers>
23. All HEIs participating in REF 2021 are required to establish safe and supportive structures to enable individuals to declare voluntarily any individual circumstances that may have affected their ability to research productively during the assessment period (1 January 2014 – 31 July 2020). The impact of those circumstances will be fairly and appropriately reflected in the University's expectations of their contribution to the output pool. These processes are documented in this Code of Practice (see paragraph 80-86 and appendix 1).
24. **Communicating the Code of Practice:**
- 24.1 We have consulted with representatives of relevant Trade Union (UCU) to ensure that we have taken into account and listened to the views of employees before finalising this draft.
- 24.2 This draft Policy and Code of Practice has also be made available on the REF SharePoint site and emailed to all staff for their feedback and comments during the consultation process.

- 24.3 Staff have also had several opportunities to input, provide feedback and comments on this Policy and Code of Practice via workshops and individual UoA sessions. There has also been an open, on line, period of consultation.
- 24.4 The final draft will be reviewed by the Committee for Research and Innovation Strategy (CRIS), on 10th June 2019.
- 24.5 The REF Strategy Group will sign off this draft on 4th June 2019 for submission to REF on 7th June 2019.
- 24.6 The submitted and approved Policy and Code of Practice will be made available and easily accessible to all academic staff across the institution, and drawn to the attention of those absent from work. Communication methods will be agreed between individuals and line managers before any **planned** long-term absence. Unplanned absence will be handled on an individual basis via the usual line manager/HR methods. The document will be made available in Welsh, and in a variety of formats, on request.

CODE OF PRACTICE

Swansea University REF-related Committees and Strategy Groups

- 25. The University will utilise its existing formal governance structures to prepare its REF 2021 submission. In addition to the REF Strategy Group (REGSG), formed in 2015, an Equality and Diversity Sub Group (EDSG) and a separate Appeals Committee will be established in the summer of 2019.
- 26. The committees involved with REF processes are shown in the diagram below, along with the terms of reference, formation and membership. Consideration is given to membership in terms of diversity wherever possible and will be kept under review.



- The REF Strategy Group (REFSG) including its two sub-committees:
 - Equality and Diversity Sub-Group (EDSG)
 - Appeals Committee
- Committee for Research and Innovation Strategy (CRIS)
- College Research Committees including:

- Unit of Assessment (UoA) REF Teams

27. **The REF Strategy Group (REFSG)** will be responsible for the formulation of the University's submission and ensuring compliance with this Policy and Code of Practice through equality impact assessment.

27.1 **Terms of Reference:** The REF Strategy Group, in its capacity as the Executive Committee for REF for the University's Senior Management Team (SMT¹) will:

- provide strategic direction and support to all Colleges on REF related activities;
- define, manage, approve and review REF related strategies and policies;
- oversee the REF 2021 submission;
- regularly review the REF project plan;
- handle and resolve strategic issues and risks;
- escalate any key risks or issues to the University's Senior Management Team;
- regularly assess the University's current REF capability and activity;
- identify information management requirements and opportunities;
- communicate with researchers via workshops, 1-2-1 meetings, email, regular newsletters and REF road shows;
- inform key stakeholders of REF related progress and activities, including the Senior Management Team (SMT), Committee for Research and innovation Strategy (CRIS), University Management Board (UMB), Council, Senate, and Trade Union (UCU) representatives;
- assess the resources needed to address challenges and progress opportunities;
- prioritise College/institutional requirements;
- review the proposed REF submissions by Colleges and their UoA REF Teams;
- implement and manage a fair and equitable process to monitor and review REF related activities conducted across the institution;
- work with College Directors of Research to ensure consistency and fairness in the REF processes;
- work with College Directors of Research to ensure that the Code of Practice is fully and properly applied in relation to all REF related activities;
- oversee the establishment of the Equality and Diversity Sub Group (EDSG), consisting of members of the REFSG along with specialist advisers including HR and Equal Opportunities, for the purpose of assessing individual circumstance applications and recommending reduction to the UoA output pool to REFSG;
- receive and act upon the recommendations from the EDSG of the individual circumstance applications and the impact of the recommended reductions.
- oversee the establishment of the sub-committee to deal with any appeals received (see paragraph 27.8).

27.2 **Formation:** The REFSG was formed in 2015, as an executive body formed to oversee the University REF submission and strategy development.

27.3 **Membership:** The current membership of the REF Strategy Group comprises Senior Management Staff and Professional Service Staff responsible for the University's submission to

¹ The Vice-Chancellor is the University's chief executive and principal academic and administrative officer. He provides leadership and strategic direction to the University and is responsible for its financial sustainability. He is supported by a Senior Management Team (SMT) with responsibility for specific activities within the University.

the Research Excellence Framework exercise. There are four members of the Academic staff, representing all seven Colleges. The membership is as follows:

- Pro-Vice-Chancellor – Research and Innovation
- Deputy Pro-Vice-Chancellor (Research)
- Dean of Academic Leadership (Research Impact)
- Dean of Academic Leadership (REF Environment and Interdisciplinary Research)

Membership also includes Senior Professional Service Managers from Human Resources (HR), Research, Engagement and Innovation Services (REIS), Information Systems and Services (ISS), and the Planning and Strategic Projects Unit (PSPU).

- 27.4 **Position within the REF process:** Charged with ultimate responsibility for the University's REF submission the REFSG will oversee the REF management process; provide direction and communicate decisions of the formal appeals process to the relevant College Research Committees, and where appropriate, seek advice and guidance from the Committee for Research and Innovation Strategy (CRIS).
- 27.5 **Mode of operation:** The REFSG will meet at least once a month. It will discuss, endorse and, where necessary, refer any REF strategies to SMT. It will inform the University's Senior Management Team of the outcomes and recommendations of the internal REF assessments, criteria for identifying independent researchers (R-only) staff (see paragraph 45-51) and any decisions following receipt of recommendations from EDSG and Appeals Committee (see paragraph 80-95).
- 27.6 **Communications:** Strategy, policy, criteria and internal assessment requirements will be communicated via a series of channels including REF roadshows, REF preparation exercises and via electronic media such as SharePoint and the University's Intranet. The selection of outputs for submission will be kept under review by means of the Mini-REF preparation exercises with involvement from HR, PVCs, Heads of College and Directors of Research. The outcome of this process will be communicated to staff by either the UoA REF Team Coordinator, the College Director of Research or the Head of College, as appropriate.
- 27.7 **Equality and Diversity Sub Group (EDSG),** a sub-group of REFSG, will manage the individual staff circumstances application process (see appendix 1) and report results and recommendations to REFSG.
- 27.7.1. **Membership** will include a member of REFSG, specialist advisers and other appropriate individuals including for example HR and Equalities.
- 27.7.2. **Members** will consider applications and recommend reduction to the UoA output pool (based on the table at Annex L: *REF Guidance on Submissions 2019/01*) to REFSG.
- 27.7.3. **All** submitted individual staff circumstances forms will be considered by the the ESDG, on a consistent basis across all UoAs. The Sub Group will make recommendations to REFSG about adjusting expectations of an affected individual's contribution to the unit's output pool. The relevant UoA REF Team will then be informed of the decisions.
- 27.8 **Appeals Committee,** a sub-committee of REFSG, will be established towards the middle of 2019.
- 27.8.1. **Membership:** Yet to be confirmed, will include a senior member of university management e.g. Pro-Vice-Chancellor or Deputy Pro-Vice-Chancellor to Chair this committee. ensure fairness and objectivity in the process the panel will not include staff members from the College, or UoA, of the candidate whose appeal is being heard.
- 27.8.2. The Appeals Committee will consider appeals from the following:
- Individuals who consider that they have achieved the level of research independence required but have not been included in the institution's REF submission (see Part 3 paragraphs 45-51).
 - Individuals that have identified circumstances and consider that the effect of these circumstances has not been recognised (see Part 4 paragraphs 80-95).
- 27.9 For appeals arising following Mini REF exercises, see paragraph 31.6.

28. The Committee for Research and Innovation Strategy (CRIS)

28.1 **Terms of Reference:** The Committee for Research and Innovation Strategy (CRIS) is a Senate committee whose purpose is to progress, foster and review research activity in the University. Accordingly, CRIS will complement the work of REFSG by:

- developing, communicating and regularly reviewing the University’s research strategy focusing on strategic planning and preparation for the REF;
- monitoring College and University Research Centres’ delivery of strategic research objectives and “testing and challenging” key components of College research strategies;
- promoting and supporting Colleges in their pursuit of external research funding opportunities;
- recommending to Senate the establishment, amendment and closure of University Research Centres, receiving reports and reviewing their performance at suitable intervals;
- discussing major strategic issues relating to the University’s research environment, strategy and performance;
- acting as a forum for the cross-institutional exchange of information and ideas and for the promotion of good practice in research;
- liaising with and receiving reports from the REFSG as appropriate;
- working towards the implementation of the Concordat to support the career development of research staff and for increasing their contribution, capability and visibility in the institution.
- developing a University-wide awareness of ethical issues relating to research and furnish guidelines for Colleges via the Research Ethics and Governance Sub-Committee.
- receiving reports on the activities of the Research, Engagement and Innovation Services (REIS);
- advising on any matter referred to it by Senate.

28.2 **Formation:** The Committee is part of the existing governance structure of the University and reports to Senet.

28.3 **Membership:** It is expected that wherever possible membership of this committee shall be diverse so as to fairly represent the pool of research staff across the institution. The current membership comprises academic staff from Colleges and key representatives from Professional Service Units playing a pivotal role in research strategy formulation and implementation. The membership is as follows:

- Pro-Vice-Chancellor Research
- Deputy Pro-Vice-Chancellors x2
- College Directors of Research x7
- College Research Hub Manager x1 rotating
- Director of Postgraduate Research Studies
- Dean of Academic Leadership (Research Impact)
- Dean of Academic Leadership (REF Environment and Interdisciplinary Research)

Membership also includes senior members of the Professional Service Units such as Research, Engagement and Innovation Services (REIS) and Planning and Strategic Projects Unit (PSPU).

28.4 **Position within the REF process:** Policy advisory and developmental group

28.5 **Mode of operation:** CRIS meets once a semester, reports to Senate² on academic matters relating to research and advises the SMT and REFSG on REF related matters.

² The Senate includes over 200 members and is the senior academic body in the University. Senate may require reports on academic matters relating to research from any appropriate body, and it may approve, amend or refer back to the appropriate body any academic matter relating to research.

29. College Research Committees

Each College Research Committee will have the responsibility for the initial proposal for the REF 2021 submission for the UoAs within their college, and the application of this Policy and Code of Practice. College Research Committees will prepare their proposed REF submission and submit it to the REF Strategy Group for review and approval.

Where appropriate, College Research Committees have established individual UoA REF Teams to undertake output assessments and manage the UoA level preparations for submission to REF 2021, on its behalf. This typically applies to Colleges that include several UoAs. Where a UoA spans two or more Colleges, then the relevant College UoA Teams will work conjointly.

- 29.1 **Terms of Reference:** The College Research Committee in conjunction with any relevant UoA REF Team will:
- communicate to all staff within the UoA the detailed criteria that reflect the quality level expected by the University. Whilst there will be a uniform process across the University for assessing outputs for the REF, the criteria to be used will vary from discipline to discipline in accordance with the REF Guidance on Submissions (2019/01) and Panel Criteria and Working Methods (2019/02).
 - produce and communicate to all staff within the UoA a bespoke Statement of Intent (Sol) giving information about how the UoA will carry out its quality assessment of outputs and its process for the final selection of outputs for submission from the available pool of REF-eligible outputs.
 - the Sol will be based on the REF Guidance on Submissions (REF2019/01) and Panel Criteria and Working Methods (2019/02). Further explanation of what is included in Sol is set out below (see paragraph 31.1-31.9).
 - carry out meaningful consultation with members of staff on the Sol. The Sol will be provided to all members of staff in the UoA for comment and it will be an item for the agenda at staff meetings.
 - notify members of staff about the process of appeal.
 - to ensure an appropriate balance between confidentiality and transparency and accountability, UoA REF Teams will report to the College Research Committee on how mini-REFs exercises have been conducted, including general trends and issues arising, using anonymised data.
- 29.2 **Formation:** The College Research Committee is part of the existing governance structure of the College and will oversee the work of the UoA Team/s.
- 29.3 **Membership:** It is expected that wherever possible membership of the College Research Committee, and any UoA REF Team(s), shall be diverse so as to represent the pool of staff within the College/UoA. Clear definitions of each person's role within the process must be provided with the relevant Sol, including the rationale for their role and where the role fits into the institutional management framework.
- 29.4 **Position within the REF process:** The Sol will set out the process by which the College Research Committee or, as may be delegated, the UoA REF Team will carry out its assessments of REF eligible outputs and impact case studies, make its selection of outputs from the available pool of outputs and, how the final selection of outputs will be made for submission to REF, including details of those who will be involved in the decision-making process, the criteria that they will use, the evidence that they will call upon, the circumstances that they will take into account and the channels of communication that they will employ to inform staff within the UoA.
- 29.5 **Mode of operation.** This will be set out in the Sol and will include:
- the criteria that the UoA will use in carrying out its functions;

- the method by which these criteria are communicated to staff; and
- the method by which feedback will be provided in respect of the decisions made

29.6 **Communication:** The Sol will set out the communication mechanisms.

30. **Training:** Members of all the groups detailed above, and any individuals that may be part of the REF preparation and submission process will be required to have participated in, and satisfactorily completed, the most recent version of the Marshall Equality On line Equality Training package. In addition, members of the University Equality Team will deliver equality training specifically tailored to the REF process, which will include reference to the Equality Act 2010, individual circumstances and mitigating risks of bias (see appendix 2).

31. **Statement of Intent:**

As a mandatory requirement for REF, all of our Colleges and relevant UoA REF Teams have produced a SOI for each UoA with the following nine minimum requirements:

31.1 **UoA REF Team Structure:** To include UoA Coordinator, UoA Environment Lead and UoA Impact Lead and must give details on:

- Membership and roles/responsibilities within the Team;
- Date of appointment to the Team;
- The rationale and process involved in appointing colleagues to the Team;
- Assurance that diversity and equality has been considered and where possible the membership reflects the constitution of the REF eligible staff within the UoA; and
- The process of consultation in the formation of the Team with assurance, including written evidence, that where applicable, the wider UoA community has been consulted on membership of the Team.

31.2 **Published outputs:** To include:

- the criteria used and the selection process of internal assessors (e.g. Number of assessors, timescales involved, and usage of citation data as contextual information – where this accords with the stated panel criteria and working methods for the UoA)
- Selection and consistency of use of external assessors in line with the University's "*Policy on Appointing External Assessors for REF Preparations*" (document available on the University's REF SharePoint site).

The Sol will refer to the following output assessment process (Publications Mini-REF):

- Details of how the Team will apply the "*Guidance on How to Determine Final Scores for Outputs for REF*" (document available on the University's REF SharePoint site), and must include:
 - Internal assessment: Each output must be assessed by a minimum of two internal assessors using the 12-point scoring system.
 - Swansea University employees, even if from a different UoA, are classed as internal assessors.
 - The UoA Team will consider all of the internal scores and the feedback received to determine one internal score.
 - External Assessment: External assessors will receive formal guidance on how to assess outputs and be provided with a review template. External assessors will also be reminded of their legal responsibility to ensure that individuals with protected characteristics are not discriminated against and all outputs are assessed in a fair, consistent and transparent way. External assessment will have been used in all cases to ensure consistency across UoAs.

- Selection of external assessors will be based on expertise and standing as indicated by, for example, membership of previous REF or RAE Panels, acting as reviewers for other universities, editing major journals or other indicators of eminence in the profession and UoA.
- The appointment of external assessors will be approved by the REFSG.
- Overall assessment REF output score:
- The final recommendation on the outcome of assessment is a combination of the agreed internal score and the external score and based on the internal and external feedback received.
- individual members of staff who authored the output will be informed of the outcome (see “feedback” below).
- To ensure consistency the same output quality assessment template is used for both internal and external assessment, and for all UoAs across the University.

31.3 Research Impact: The Sol will explain the impact case study selection and development process, including:

- Engagement with external users to support the development of case studies.
- The collection of auditable evidence to corroborate claims made within case studies.
- Use of external assessors to gauge the quality of case studies.

The Sol will also describe:

- how all members of staff within the UoA were invited to offer a case study for consideration by the Team.
- how internal selection/guidance will be provided within the UoA on institutional assessment mechanisms (Mini-REF).
- the method and timing of feedback to members of staff who are preparing case studies.
- that equality impact assessment will apply at a University level.

31.4 Research Environment: The Sol will explain the development process for the Research Environment Template (REF5b), including:

- Collation and assessment of quantitative data (PhD completions, Research Income and research income in kind).
- Collation of other relevant quantitative and qualitative indicators.

The Sol will also describe:

- how all members of staff within the UoA were invited to contribute to the development of the UoA’s Environment Template.
- the process for sharing appropriate quantitative and qualitative Environment data with all UoA staff.

31.5 Final selection of outputs for submission to REF - process

The Sol must outline the UoA outputs selection process reflecting, as minimum, the University selection criteria and this Code of Practice (see paragraph 78).

The Sol will explain:

- that all REF eligible Category A staff (see paragraphs 32-44) will be submitted to REF 2021 with a minimum of 1 and a maximum of 5 REF eligible published outputs.

- that staff on Research only contracts that satisfy the criteria as stated below (paragraph 45-51) will be identified as Category A staff, and included in the REF 2021 submission.
- the University's aim of maximising the submission of 4* outputs, working towards achieving objectives as set out in our Research and Innovation Strategy.
- the number of outputs and case studies required for the UoA given its FTE of Category A staff, which may be dependent upon any individual circumstances that have been disclosed.
- the submission of outputs will be made up of the one best-quality output from each REF Category A member of staff with the balance made up of the remaining best-quality outputs from the available pool of REF eligible outputs.
- that staff are invited and encouraged to put forward what they regard as their best-quality outputs for assessment within the REF census period.
- that staff are invited and encouraged to indicate outputs that they regard as meriting double weighting.
- that staff should indicate instances of joint authorship issues and how these might be resolved.
- how staff in the UoA will be consulted on the output selection process, for example at an appropriate meeting of relevant staff. Members of staff not present (e.g. on maternity leave or working part time) will also be consulted.
- that there will be a University Equality and Diversity Sub Group (EDSG) to consider individual staff circumstances and make recommendations on any appropriate reductions to an individual's expected contribution to the formation of the REF-eligible output pool (see appendix 1).
- the approach to determining whether the cumulative effect of individual staff circumstances has disproportionately affected the unit's potential output pool and if a reduction should be sought with respect to the final submission.

31.6 Appeals arising from Mini REF exercises

The Sol must outline the UoA level appeals process if a disagreement arises following the Mini-REF output-assessment exercise.

The Sol will explain that the following process will be followed:

- Individuals should not, under any circumstances, contact an external assessor directly and should advise the UoA Coordinator if they consider that the publication assessment process, as agreed and described in the Sol, has not been adhered to.
- The UoA Coordinator will respond to the individual making the appeal within two working weeks to confirm receipt of their appeal, to inform them of the steps to be taken to determine the appeal, and to provide a timeframe for a decision to be made on the appeal and for that decision to be communicated to the individual concerned.
- If an individual has not received a response within this period, or believes the UoA Coordinator has not responded to their appeal in an appropriate manner, they should then advise the REFSG via ref@swansea.ac.uk email address.
- The REFSG will only consider appeals on the output-assessment process and will respond to the appellant within a week following the next appropriate meeting. (Normally meetings are held monthly.)
- For appeals on individual circumstances and research independence, see paragraph 27.8.

31.7 Equality, Diversity and inclusivity

The Sol explains that:

- Every eligible member of staff (i.e. Category A staff) will be invited to declare any individual circumstances that they feel may have affected their research productivity and ability to contribute to the pool of outputs from which the UoA's submission will be drawn (see appendix 1).
- Equality considerations will apply to the establishment of UoA REF Teams (as described above) and the identification of R-only staff as independent researchers, ensuring equality monitoring of applicants by the institution in terms of protected characteristics and that appropriate support will be provided at an individual level in accordance to the outcome of an equality impact assessment.
- All staff that may be part of the REF preparation and submission process will be trained in equality with specific regard to REF and all external assessors will be provided with appropriate consistent guidance.
- The Code of Practice and the Sol will be adhered to throughout all REF preparation and submission processes and will be made available to all members of staff through appropriate mechanism e.g. staff meetings and the University's REF SharePoint site.
- The same principles (equity, transparency, consistency and accountability) will apply to impact case studies.

31.8 **Communication:** The Sol will:

- Describe the means of communicating to all relevant staff within the UoA.
- Explain how there will be consistent feedback mechanisms and processes within the UoA.
- Explain how information will be provided to staff on the University's REF processes, e.g. Mini-REF and appeals processes.
- The REFSG recommends that there is a least one UoA level consultative meeting per academic year for all staff included in the UoA to discuss any changes to processes and procedures, and the membership of the UoA REF Team or external assessors, and to ensure that the Sol is communicated effectively to all staff in the UoA.

The Sol will include statements to the effect that:

- Members of staff in the UoA will be consulted on the Sol, for example at an appropriate meeting of relevant staff. Members of staff not present (e.g. on maternity leave or working part time) will also be consulted.
- The Head of College, UoA Coordinator or a member of the UoA REF Team, will give both written and verbal feedback, to the submitting author, on the outcome of the assessment of each submitted output. A written statement on the outcome of the internal and external assessments of each output will be provided stating the outcome and the reasons for that outcome.
- Individual members of staff may provide a written statement on any disagreement with the output assessment process (see paragraph 31.6).
- The outcomes of Mini-REF output-assessment exercises will be communicated to individual members of staff as above.

31.9 **Support** The Sol will include identification of research support needs

The Sol to include statements to the effect that:

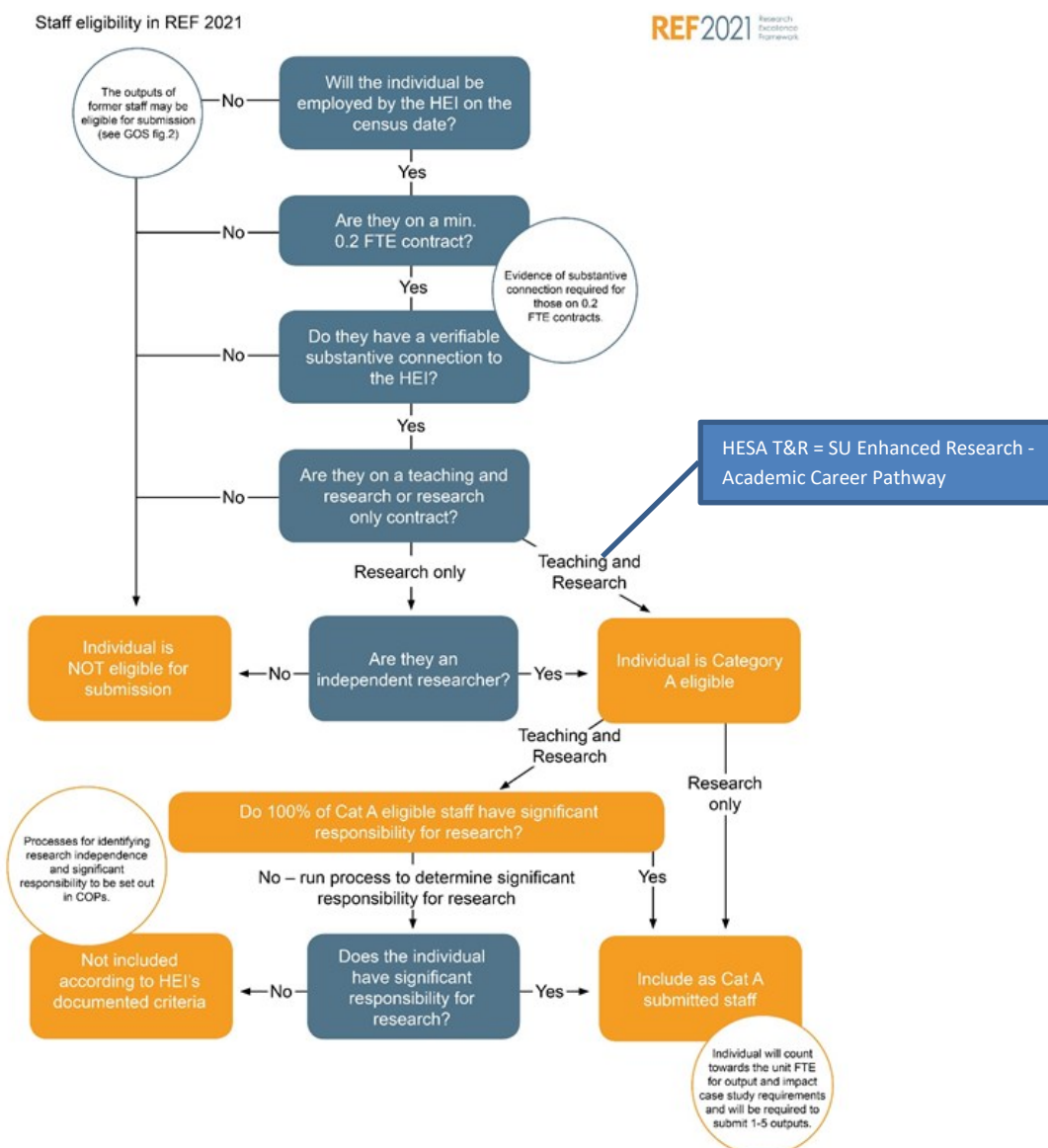
- All staff will be encouraged and supported in developing a portfolio of REF eligible outputs for submission.
- This will be a focus of both the Professional Development Review process and regular informal meetings with members of staff.

- More specifically, every individual will have the opportunity to develop and monitor a publications' strategy.
- Consideration will also be given to all and any groups with protected characteristics revealed in the Mini-REF equality impact assessment(s) as being potentially disadvantaged. Such support may be provided at individual, UoA, College or University level, depending on the issues involved.
- If any potential barriers are identified further discussions will be had with appropriate groups and all reasonable efforts will be undertaken to explore how any potential barriers or disadvantages might be overcome and remedied.

31.10 Quality Assurance checks

- The Quality Assurance (QA) process will support the outputs Mini-REF process by ensuring a consistent, fair, open and transparent approach to assessing outputs.
- The QA process will maintain a level of transparency and consistency whilst helping to provide a greater level of confidence in the output-assessment process.
- The process will be a rolling programme of QA checks administered by the University's central REF team based in PSPU. The REF Manager will oversee this process and a results-and-recommendations report will be prepared regularly for the REFSG.
- The QA checks will be based on reports taken from the University's Research Information system (RIS), which holds all of the output-assessment records. A representative sample of these records and reports for each UoA will be reviewed to ensure that the assessment process has been undertaken consistently and recorded correctly across all UoAs.

Part 2: Identifying staff with significant responsibility for research



32. The University identifies REF 'Category A eligible staff' as those with an ACP of Enhanced Research (HESA employment function 3, T&R), who are on the payroll of Swansea University and hold a contract of employment of 0.2 full-time equivalent (FTE) or greater on the census date of 31st July 2020, and, for such staff between 0.2 and 0.29 FTE, have a substantive research connection with the University.
33. Since the 'Category A eligible' staff definition accurately identifies staff in the University with significant responsibility for research, the University will submit 100 per cent of Category A eligible staff.
34. The University recognises we need a workforce with the differentiated skills necessary to ensure that we can deliver excellence in research, teaching, learning, and the wider student experience, and to be a powerhouse for the regional economy and internationally.
35. The Academic Career Pathways (ACP) scheme was designed and implemented in 2013 to ensure that academic strengths, whether in research, teaching, the wider student experience, leadership or innovation and engagement, are all appropriately recognised, developed, valued, and rewarded.

36. The development of the ACP criteria was led by a Pro-Vice Chancellor, in partnership with key representatives from the academic community and HR, and in consultation with Trade Union representatives. The purpose of this approach is to support all academic colleagues to work to their full potential, by providing a fair and consistent set of required performance criteria, and associated indicative performance levels, which are clear and transparent for all.
37. The ACP criteria differentiate between different levels of Academic (Lecturer, Senior Lecturer, Associate Professor & Professor) and different enhanced strands (Research, Teaching & Scholarship, Innovation & Engagement), each with its own set of clearly defined criteria and indicative levels of performance.
38. The ACP criteria are embedded into all Academic job descriptions, Academic Recruitment processes, Academic Professional Development Review (PDR) and Interim PDR processes, the Academic Promotion process and the Professorial Remuneration process. All decisions within these processes are made on the basis of evidence of performance assessed against the relevant criteria, ensuring that everyone is treated fairly and consistently, regardless of gender, ethnicity, sexual preference etc.
39. The ACP criteria are reviewed annually to ensure that they continue to be consistent, fair and align with the needs of the business.
40. Throughout the PDR and Academic Promotion period, the HR team capture feedback from academic colleagues, which is provided to the ACP working groups for review.
41. There are 3 ACP working groups, one for each of the 3 enhanced strands (Research, Teaching & Scholarship, Innovation & Engagement) respectively, which meet between May and August each year to review the criteria and associated indicative performance levels, and to decide on any enhancements. Each group is led by a Pro-Vice Chancellor and consists of relevant senior Academic leaders for the relevant strand (i.e. The Research ACP working group includes the Directors of Research from each of the 7 colleges).
42. The HR team ensure any enhancements are reflected in all processes and documentation by 1st September each year, and clearly communicated to all Academic colleagues.
43. Those individuals that have an ACP of Enhanced Teaching and Scholarship or Enhanced Innovation and Engagement do not have significant responsibility for research (as clearly defined by the ACP criteria for these strands), are not considered as REF Category A staff and, therefore, will not be submitted to REF.
44. Decisions on Research only staff submitted and the selection of outputs submitted will not be taken into account in relation to any promotion, progression, extension of contract or performance management procedures.

Part 3: Determining research independence

45. The REF Guidance on Submissions (REF2019/01) sets out that staff employed on “research only” contracts must be “independent researchers” to meet the definition of Category A eligible staff. For the purposes of REF, an independent researcher is defined as “an individual who undertakes self-directed research, rather than carrying out another individual’s research programme” (Paragraph 131: REF2019/01).
46. To be meet the definition of Category A eligible staff, staff employed on “research only” contracts must be “independent researchers” (see paragraph 44) and on the payroll of Swansea University and hold a contract of employment of 0.2 full-time equivalent (FTE) or greater on the census date of 31st July 2020, and, for such staff between 0.2 and 0.29 FTE, have a substantive research connection with Swansea University.
47. The following indicators of such “research independence” were agreed through consultation with College Directors of Research and representatives of all UoAs across the institution, including Trade Union (UCU) representatives, and developed in line with those indicators considered suitable, and accepted by all REF main panels.
48. Each indicator does not individually demonstrate independence, and only if an individual meets both criteria will they be considered to be an independent researcher and returned to REF as Category A staff.
- Research fellowship – must hold an independently won externally funded research fellowship in their name on the REF census date.
 - AND
 - Must be Grade 9 or above, with qualities as reflected in the Academic Research Grade 9 role profile as follows (further details can be found [here](#)):
“Research staff at this grade will take lead responsibility for a significant part of large research proposals or lead multi projects in their own right. They will publish in high-quality publications and will contribute to the acquisition of research funds.”
49. The following process was agreed to determine research independence of Research only staff:
- Heads of Colleges, College Directors of Research and UoA REF Coordinators will be provided with a list of all staff on an R-only contract, regardless of contract end date.
 - Staff employed on a Grade 8 Research only contract, and those working as Research Assistants (RA) on other people’s research, and Technology Transfer Fellows (TTF) were immediately recognised as not being independent researchers and they were removed from the list.
 - All R-Only staff remaining after Grade 8, RAs and TTFs removed, must satisfy both criteria as detailed above to be considered Category A staff for REF.
 - All individuals that satisfy the criteria will be recorded as Category A staff within the HR system and included in the next Mini-REF.
50. Timescales for confirming REF eligibility for R-only staff:
1. Late spring 2019 initial decisions, with individuals included in the 2019 Mini-REF exercise.
 2. Spring 2020 a further review of R-only staff to confirm or revise as appropriate the initial decisions.
 3. After spring 2020, all new appointments, anyone promoted to Grade 9 and anyone receiving a Fellowship, will be reviewed on an on-going basis.
- 50.1 Communication of the initial decisions will be made by the College Director of Research and/or UoA REF Coordinator by late summer 2019 via face-to-face meetings or email for individuals who, at the relevant time, are absent from work for any reason.
- 50.2 Any further decisions made will be communicated as above in an appropriate manner and timescale.

51. Decisions made are subject to appeal, see details of appeals process at paragraph 109.

Part 4: Selection of Outputs

Background

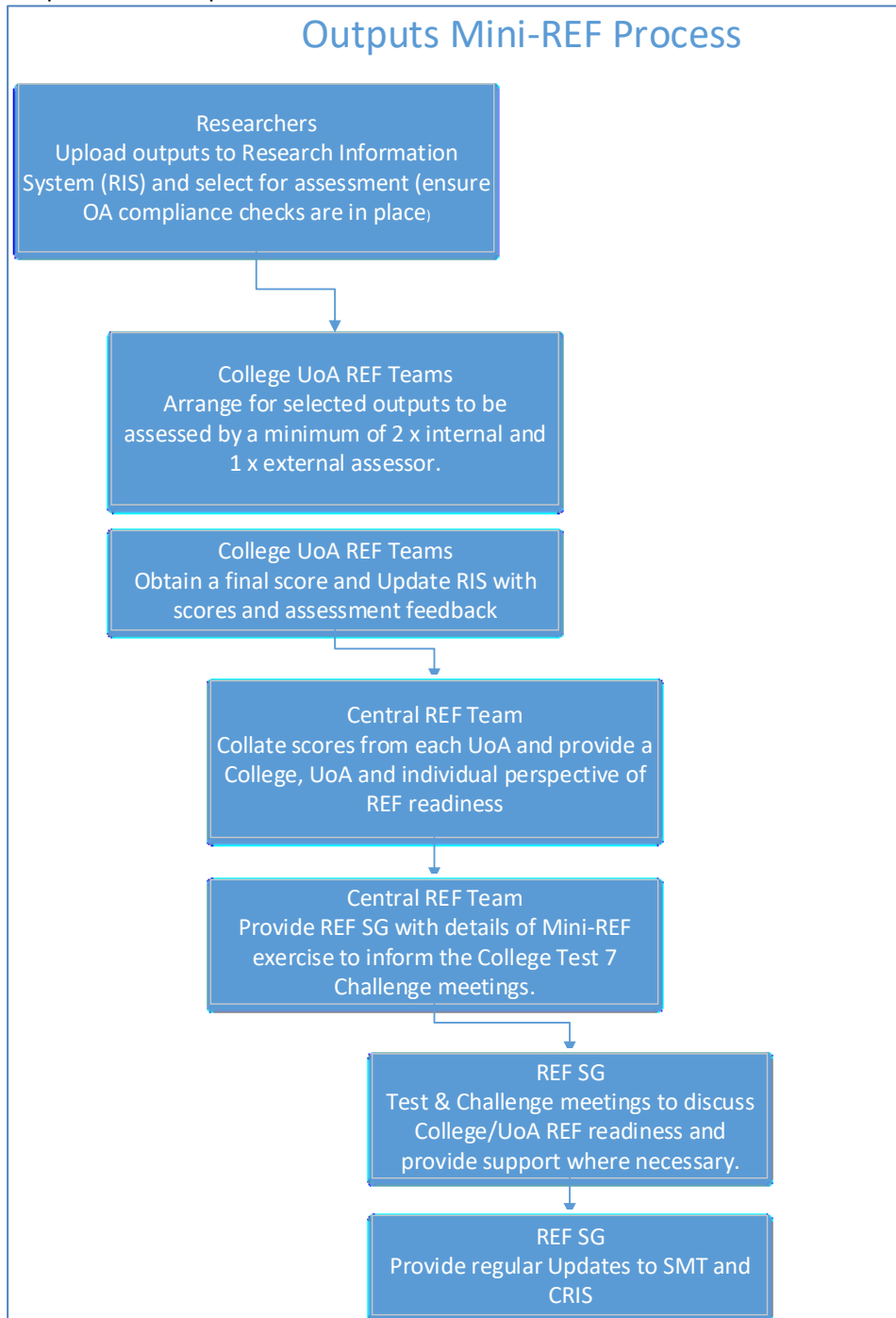
52. For the REF 2014 submission preparations the University developed a submission strategy and implemented a series of activities, embedding equality and diversity throughout, that provided a robust internal assessment of its performance against the REF criteria.
53. The activities included Mini-REF exercises, an open and transparent process of assessment of outputs, Impact and Environment.
54. The processes were developed, and updated annually, through consultation with academics, senior professional service staff and Trade Union (UCU) representatives.
55. Continuous and intense engagement with Colleges and researchers during the REF 2014 preparations generated considerable learning in terms of best practice. The managed approach, with a clear institutional quality profile target, required considerable effort, dedication and creativity from all of those in a management role, our excellent researchers and support staff.
56. The Strategy Management Group for Research (no longer sitting, now part of CRIS) conducted an evaluation of the process and framework undertaken by Swansea University, post submission, in January 2014. In excess of 90 colleagues were given the opportunity to reflect constructively on their experiences of the REF 2014 and provide thoughts on how improvements could be made for future preparations, with focus on transparency, consistency, equality and inclusivity.
57. The combination of feedback and analysis has led to the following key lessons learned that have been incorporated into the planning of REF 2021 preparations:
 - The Outputs assessment process needs to be robust and, wherever possible, needs to make use of former REF panel members, or others with similar experience, to carry out external assessments.
 - Measures will be implemented across the whole University to support researchers to maximise the quality of the overall REF submission, including
 - a range of training opportunities mapped to the Vitae Researcher Development Framework and
 - specialist support provided by REIS, guiding researchers through the entire research lifecycle from research ideas, through grant capture, commercialisation and developing business ideas.
 - An Impact Strategy has been developed which will identify support requirements for staff, develop current and future impact, and support UoAs in building an evidence base.
 - The time spent by Individuals working on Impact and Environment for REF will be acknowledged within allocations and workload models.
 - Effective communication between the REFSG and Colleges/UoAs by means of road shows, briefings and workshops is essential.
58. **Outputs Mini-REF:**
59. The process for assessing outputs for REF has been developed over several years with input and regular communication from academics across all disciplines, as well as Trade Union (UCU) representatives.
60. The Mini-REF processes will be used as opportunities to apply this Code of Practice and, where appropriate, to refine it further.
61. In 2017, the REF Strategy Group made an informed decision to utilise a point-based scoring method to assess published outputs for REF 2021 preparations, with the aim of enhancing the robustness of output assessments with confidence levels associated with each rating.
 - The benefits for a point-based scoring system include:
 - I. Better informed decisions on the inclusion of REF 2021 published outputs.
 - II. Comparable scorings for internal and external assessors.

62. The Publications Mini-REF uses a system based upon an assessment of each academic's outputs via internal and external assessment using the 0–12 rating system followed by meetings to discuss every academic's performance with the relevant Head of College, College Director of Research and/or UoA Coordinators. All staff on the ACP Enhanced Research (T&R) are included in the exercise (From spring 2019, R-Only staff, identified as REF Category A staff, will also be included and their outputs will be handled in the same manner as all other Category A staff).
63. The Mini-REF exercise may also include assessing outputs from REF-eligible former staff members.
64. Prior to the commencement of the Mini-REF exercise the UoAs are required to review and amend where appropriate the Sol (detailed in paragraphs 31.1-31.10) and communicate it to all UoA staff and REF eligible academics and, submit to the REFSG.
65. External assessors will be informed of and provided with this Code of Practice. Guidance will be provided to external advisors on the appropriate level of detailed comment on each individual's outputs to complement their scores.
66. UoAs are required to ensure that individuals that are absent from work will be made aware of the Sol and be given the opportunity to provide feedback to the UoA.
67. Colleges are required to pay particular attention to supporting those groups of staff who were under-represented in REF 2014 (*Selection of staff for inclusion in the REF 2014, HEFCE 2015*):
 - Women.
 - Black, Minority and Ethnic Staff (BME).
 - Staff that have a disability.
68. A publication profile is completed for each member of staff, showing the range of output scores. This will build annually towards a complete UoA outputs profile, i.e. the available pool of outputs, in preparation for submission to REF 2021.
69. All Mini-REF exercises will include equality impact assessments, and the implications of these will be used to refine future Mini-REFs and considered when preparing the final submission for each UoA and the University as a whole.
70. Following the 2019 Mini-REF exercise, the REF Strategy Group will monitor progress with regular (monthly) updates of the UoA outputs profile.
71. We do not expect all staff to contribute equally to the pool of outputs available for submission and identified individual staff circumstances will be taken into consideration.
72. Final decisions on output selections for submission will not be taken into account in relation to any promotion, progression, extension of contract or performance management procedures.
73. The University will not be submitting any research outputs or impact case studies where the submitting authors have been made compulsorily redundant, or of authors whose employment has been discontinued due to non-renewal of fixed-term contracts after four or more years of continuous service.
74. Such former colleagues no longer employed in the University will not be named in the environment template without their written consent.
75. This does not preclude submission of multi-authored work where other authors remain employed in Swansea University.
76. The final selection of outputs for submission will be made by the relevant Head of College, on advice of College Director of Research and/or UoA Coordinator, and once ratified by the REF Strategy Group this will be communicated to UoA staff within the UoA.
77. The procedure used to make final decisions must be consistent with the principles of this Code of Practice:
 - must be **transparent** and **consistent**
 - those **accountable** for making decisions must be clearly defined in the Sol

- **equality** and **inclusivity** ensure all types and forms of research are recognised on a comparable basis.

78. The final selection of outputs, not accounting for individual staff circumstances, will be based on the submission of the one best-quality output per individual and the remaining best-quality outputs from the pool of available outputs that have been rated using the Mini-REF process.

79. The annual Outputs Mini-REF process



80. Individual Staff Circumstances

81. As a key measure to support equality and diversity in research careers, the funding bodies have put in place processes to recognise the effect that an individual's circumstances may have on their productivity.
82. The approach to individual staff circumstances set out here has been developed by the funding bodies to meet a number of key principles:
- Ensure recognition of the effect circumstances can have upon an individual researcher's productivity.
 - Create the right incentives for HEIs to support staff with individual circumstances.
 - Recognise the potential disparity in the available output pool for units in particular contexts, for example, where there are high proportions of staff with individual circumstances, or for very small units.
 - Maintain the integrity of the REF exercise – both in supporting equality, diversity and inclusivity, and in ensuring the credibility of the assessment process.
83. Where required, submitting units may optionally request a reduction, without penalty, in the total number of outputs required for a submission.
84. In addition, in all UoAs, an individual may be returned without the required minimum of one output, without penalty in the assessment, where the nature of the individual's circumstances has had an exceptional effect on their ability to work productively throughout the period, so that the staff member has not been able to produce the required minimum of one output (see paragraph 87).
85. 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 (see appendix 1). Information will be collected on 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 such circumstances. The purpose of collecting this information is threefold:
1. To enable staff who have not been able to produce a REF-eligible output during the assessment period to be entered into REF, without penalty, where they have:
 - a. 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).
 - b. circumstances **equivalent** to 46 months or more absence from research due to equality-related circumstances.
 - c. two or more qualifying periods of family-related leave.
 2. 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.
 3. To establish whether there are any Units of Assessment where the proportion of declared individual staff circumstances is sufficiently high to warrant a request to the Higher Education funding bodies for a reduced required number of outputs to be submitted.
86. **Applicable circumstances**
- a. Qualifying as an Early Career Researcher (ECR) (started career as an independent researcher on or after 1 August 2016).
 - b. Absence from work due to secondments or career breaks outside the HE sector.
 - c. Qualifying periods of family-related leave:
 - i. 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.

- ii. Additional paternity or adoption leave³, or shared parental leave⁴ lasting for four months or more, taken substantially during the period 1 January 2014 to 31 July 2020.
- d. Junior clinical academics who have not gained a Certificate of Completion of training by 31 July 2020.
- e. Circumstances with an **equivalent** effect to absence, that require a judgement about the appropriate reduction in outputs, which are:
 - i. Disability (including chronic conditions).
 - ii. Ill health, injury or mental health conditions.
 - iii. Constraints relating to family leave that fall outside of the standard allowances.
 - iv. Caring responsibilities.
 - v. Gender reassignment.

If an individual's ability to research productively during the assessment period has been constrained due to one or more of these circumstances, they will be invited to complete the form at appendix 1 and submit it as instructed to do so.

87. Removing the 'minimum of one' requirement

87.1 All Category A submitted staff must be returned with a minimum of one output attributed to them in the submission, including staff with individual circumstances. However, where an individual's circumstances have had an exceptional effect on their ability to work productively throughout the assessment period (1 January 2014 to 31 July 2020), so that the individual has not been able to produce an eligible output, a request may be made for the 'minimum-of-one' requirement to be removed. Where the request is accepted, an individual may be returned with no outputs attributed to them in the submission, and the total outputs required by the unit will be reduced by one.

87.2 Requests may be made for an individual researcher who has not been able to produce an eligible output where any of the following circumstances apply within the period 1 January 2014 to 31 July 2020:

- an overall period of 46 months or more absence from research during the assessment period, due to one or more of the circumstances set out in paragraph 86 a-d (such as an ECR who has only been employed as an eligible staff member for part of the assessment period)⁵
- circumstances equivalent to 46 months or more absence from research, where circumstances set out in paragraph 72e apply (such as mental health issues, caring responsibility, long-term health conditions) or
- two or more qualifying periods of family-related leave, as defined paragraph 72c.

87.3 Where an individual **has** produced a REF eligible output (see Annex K: *REF Guidance on submission (REF2019/1)* for output types) during the census period, whatever their status at the time the output was published, that output must be submitted to REF.

88. Supporting staff declaration

³ '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'.

⁴ '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.

⁵ This may include absence from work due to working part-time, where this has had an exceptional effect on ability to work productively throughout the period 1 January 2014 to 31 July 2020, so that the individual has not been able to produce an eligible output. For part-time working, the equivalent 'total months absent' should be calculated by multiplying the number of months worked part-time by the full-time equivalent (FTE) not worked during those months. For example, an individual worked part-time for 30 months at 0.6 FTE. The number of equivalent months absent = 30 x 0.4 = 12.

89. The individual staff member is best placed to consider whether equality-related circumstances have affected their productivity over the REF assessment period.
90. Completion and return of the form is voluntary, and staff should not feel under pressure to declare their individual circumstances where they do not wish to do so.
91. The individual staff circumstances process will be applied equally to all applicable circumstances, whether previously known to the institution or first identified through the individual staff circumstances process.
92. 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, unless express agreement has been given via the individual circumstances declaration form (sensitive personal data will only be accessed with individuals further consent, if this is required). Therefore, only individual circumstances that have been declared voluntarily through the REF individual staff circumstances process will be considered.
93. Individuals should complete and return the form if any of the above circumstances apply and they are willing to provide the associated information.
94. To support staff disclosure of individual circumstances that may be sensitive, we reassure members of staff of the following:
- that there are safeguards that exist to protect staff members' confidentiality and privacy, and individual personal data will only be kept for the length of time necessary to perform the individual staff circumstances process and will be stored and handled in accordance with the Swansea University Data Protection Policy (appendix 3).
 - If a member of staff wishes to declare individual circumstances that the University was previously unaware of, HR will support the individual through the process and assess what follow-up support may be needed.
 - all individual circumstances forms are to be sent to REF-Equality@swansea.ac.uk This e-mail address has been specifically set up for the purpose of managing all applications. Only limited members of the HR/Equality team have access to this mail box and all forms that are received will be anonymised prior to the Equality and Diversity Sub Group or Appeal panel consideration.
 -
95. Individuals will receive feedback, via email or letter, from the EDSG on their application.
96. Decisions made on staff circumstances are subject to appeal, see details of appeals process at paragraph 109.
97. **Changes in circumstances**
98. 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 e-mail REF-Equality@swansea.ac.uk to update the information provided
99. **Ensuring Confidentiality**
100. 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 individuals have disclosed about their individual circumstances, to show that the criteria have been met for reducing the number of outputs.
- 100.1 For each member of staff for whom a request to remove the minimum of one requirement is being made, the following information must be provided to UKRI:
- Information to enable the UKRI REF team to identify the staff member within the submission.
 - Details about which circumstances, listed above, (or whether different circumstances) apply.

- A brief statement (max. 200 words) describing how the circumstances have affected the staff member's ability to produce an eligible output in the period.

100.2 For each UoA reduction request, the following information must be provided:

- Details about the number of staff in the unit with each of the defined circumstances and information that will enable the UKRI REF team to identify these staff members within submissions (including the HESA ID).
- For each member of staff with circumstances requiring a judgement, information to enable the UKRI REF team to identify the staff member within the submission, a brief outline (max. 200 words) of the nature of the circumstances and how the HEI determined an appropriate reduction, and the reduction proposed.
- A supporting statement (max. 300 words) outlining the rationale for requesting a unit reduction in accordance with the Code of Practice.

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

102. Assessing the effect of individual staff circumstances on the overall output pool

103. In view of the flexibility offered by the partial decoupling of outputs from individuals, and the reduction in output requirement since the previous exercise in REF 2014, UoAs will not routinely need to request reductions to the number of outputs required.

104. UoAs may wish to consider the cumulative effect that individual staff circumstances have had on their UoA's overall output pool and whether a request should be made for a reduction to the total number of outputs required for the submission.

105. The measures set out above are considered an effective way to recognise the effect of circumstances on individual staff productivity and ensure that the aim of promoting equality and diversity is met.

106. It is clear that there are some instances, however, whereby the available output pool for a given UoA has been "disproportionately affected" by equality-related circumstances. In such instances, it would be appropriate to seek a reduction to the total number of outputs required for that UoA.

107. Such cases may include where there are very high proportions of staff in the UoA whose individual circumstances have affected their productivity over the REF assessment period, including in very small units, or where disciplinary publishing norms make it likely that an individual will have generated a smaller number of outputs across the publication period.

108. Procedure to determine if a UoA reduction request is necessary:

108.1 Following the declaration of individual staff circumstances the EDSG will apply the tariffs as set out in appendix 4 and, using anonymised data, the central REF team will provide UoAs with the following information during the Test & Challenge meetings:

- The number of individuals disclosing circumstances and their FTE.
- The number and types of circumstances.
- The output reduction available as a consequence of those circumstances.

108.2 The UoA will then consider:

1. If the output pool has been "disproportionately affected" by declared circumstances.
 - One useful indicator, although there may be others you might wish to consider, is the size of the output pool (from which selection will be made) in terms of its proximity to the total number of outputs required.
2. Submit a reduction request to REFSG via ref@swansea.ac.uk (template at appendix 5).

108.3 Requests must include a supporting statement including information about the UoA (e.g. size, proportion of those with declared circumstances), how the circumstances affected the UoA's output pool and why this was determined to be "disproportionate" (see paragraph 107.2).

108.4 The REF SG will consider all output pool reduction requests and provide feedback to the UoA in a timely and appropriate manner.

108.5 All UoA reduction requests approved by the REFSG will be submitted to REF by the institution in autumn 2019.

108.6 After spring 2020, all new appointments or changes to circumstances will be reviewed on an on-going basis.

109. The Declaration of Individual Staff Circumstances Form along with the timelines is in appendix 1. In brief the process is as follows:

- June 2019 – Invitations to submit individual circumstances will be sent to all Category A staff.
- End June 2019 – Deadline for submission of individual circumstances declaration forms.
- 30th August 2019 – Anonymised results data returned to REFSG (see paragraph 99.1).
- During September 2019 – Results presented to UoAs during the Mini-REF Test and Challenge meetings.
- October 2019 – UoAs to assess the effect that individual staff circumstances have had on the overall output pool and submit a reduction request to the REFSG (see paragraph 107)
- November 2019 – REFSG will inform UoAs of decisions.
- Early 2020 – REFSG to submit reduction requests to UKRI REF.

110. Appeals

111. Decisions made on the following two matters are subject to appeal (for appeals resulting from the Mini-REF process see paragraph 31.6).

111.1 Individuals who consider that they have achieved the level of research independence required but have not been included in the institution's REF submission (see Part 3 paragraphs 41-46)

- Appeals should be made in writing, with reference to the criteria set out above, setting out the case for inclusion or exclusion, to REF-Equality@swansea.ac.uk. Such appeals should, if appropriate, set out any new relevant information that was not previously considered in the 'identifying independent researchers' process.
- The Appeals Panel will consider the reasons given for exclusion or inclusion by the College Research Committee and the case put forward for the alternative, and may seek the views of up to two independent assessors.

111.2 Individuals that have identified circumstances and consider that the effect of these circumstances has not been recognised in the REF submission (see Part 4 paragraphs 80-95).

- Appeals should be made in writing, with reference to the criteria set out above, setting out the case to REF-Equality@swansea.ac.uk. Such appeals should, if appropriate, set out any new relevant information that was not previously considered in the 'declaration of individual circumstances' process.
- The Appeals Panel will consider the reasons given by the EDSG or REF SG and the case put forward for the alternative, and may seek the views of up to two independent assessors.

112. Outcomes of Appeals will be notified, and reasons provided, to members of staff and to the College Research Committee, prior to final submission.

113. All appeals applications have to be submitted to the appeals sub-committee via REF-Equality@swansea.ac.uk by noon **27th August 2019**.

114. Equality Impact Assessment

115. The University will conduct Equality Impact Assessments (EIA) of the enactment of this policy and Code of Practice on staff who are eligible for submission. The Equality and Diversity Sub Group (EDSG) will monitor this using anonymised data supplied from the HR database and report regularly to the REFSG. If any prima facie imbalance is found, relative to the total potential eligible pool, then the REFSG will investigate and consider what remedial action needs to be taken.
116. Equality Impact Assessment will also monitor impact case studies.
117. An equality impact assessment will be conducted on the procedures for determining research independence for the REF to establish whether the process for the REF may have a differential impact on particular groups.
118. EIAs will also be conducted on each Mini-REF to inform the University's Code of Practice and be kept under review as submissions are prepared.
119. EIAs will be informed by an analysis of data on staff eligible for submission in respect of all the protected characteristics for which data are available. The analysis will cover all eligible staff and will include information gained from engaging, consulting or involving staff from protected groups to inform an EIA.
120. EIAs will be considered at key stages of the REF preparation process, to ensure that any necessary changes to prevent discrimination or promote equality are taken prior to the submission deadline. These stages will be:
- when identifying eligible R-only staff.
 - when selecting outputs through Mini-REFs.
 - when considering appeals.
 - when preparing the final submission.
121. Where the data show that an imbalance exists in a particular protected characteristic, the REF Strategy Group will undertake impact assessments at the level of College or UoA. This will be with a set proviso that this will not take place at the UoA level where small numbers are involved (as is the case with some UoAs) as the data may not be meaningful or individual members of staff may be identified.
122. The EIAs may identify both positive and negative outcomes and can help ascertain where outcomes can be prevented or justified within the permits of the law or where the impact is positive, extended to other protected groups.
123. Where a particular policy or procedure is found to have a negative impact on a protected group, the EDSG of the REF Strategy Group will explore alternative procedures and consider whether steps can be taken to mitigate the impact. If a policy cannot be changed, the REF Strategy Group will consider whether actions might be taken to support staff during the remainder of the census period. For example, mentoring or additional support on return from maternity leave.
124. The REF Strategy Group will record any steps that have been taken to change the policy or mitigate the impact to ensure that any negative impact does not constitute unlawful discrimination and can be justified and will be recorded in the EIA report.
125. Consideration for appropriate support will be given to those groups with protected characteristics that may be identified in Mini-REF impact assessment exercises. Such support may be provided at individual, Unit of Assessment, College or University level, depending on the issues involved.
126. The REF final equality impact assessment will be published on the University's website after the submission has been made in November 2020. The published information will include the outcomes of any actions taken to prevent discrimination or advance equality.

127. **Data collection statement for REF 2021**

128. 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 UKRI REF team, based at Research England (RE), on behalf of the four UK higher education funding bodies, manages the REF. 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.

129. If you are a researcher who will be included as part of our submission to the REF 2021, in 2020 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, research groups, and contract dates will be provided along with details of your research. If you are submitted with individual circumstances that allow a reduction in the number of outputs submitted, without penalty, some details of your personal circumstances, detailed in paragraph 99, will be provided.

130. **Sharing information about you**

131. 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).

132. 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. 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).

133. 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.

134. 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.

135. 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.

136. **Publishing information about your part in our submission**

137. The results of the assessment exercise will be published by UKRI, on behalf of the four UK higher education funding bodies, in December 2021. The published results will not be based on individual performance nor identify individuals.

138. 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 and contractual details, including your date of birth and all information about individual staff circumstances will be removed.

139. UKRI will also publish a list of the outputs submitted by us in each UoA. This list will not be listed by author name.

140. Data about personal circumstances

141. You may voluntarily disclose personal circumstances to your submitting unit, which could permit us to submit your information to the REF without the “minimum of one” 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 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 details of the individual staff circumstances process at appendix 1.

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

143. As set out above, 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. The list of outputs will include standard bibliographic data (including the author name) for each output, but will not be listed by author name.

144. Accessing your personal data

145. Under the Data Protection Act 2018 and the GDPR, you have the right to see and receive a copy of any personal information that UKRI holds about you. Further information about the Act and GRPR, and guidance on making a subject access request, can be found on the RE web-site 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

146. Details of the Swansea University privacy notice can be found at appendix 6.

Declaration of Individual Staff Circumstances

This document is being sent to all Category A staff (see Swansea University REF Code of Practice) who are eligible for submission to REF2021.

Please note that completion and return of the form is entirely 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.

However, please note that this form is the only means by which the University will be gathering this information.

You should therefore complete and return the form if any of the circumstances indicated below apply and you are willing to provide such information.

1. 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 December 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:

- I. 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; or
 - two or more qualifying periods of family-related leave.
- II. 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 and their production of research outputs.
- III. To establish whether there are any Units of Assessment (UoAs) where the proportion of declared circumstances is sufficiently high to warrant a request to the higher education funding bodies for a reduction to the required number of outputs to be submitted.

2. **Applicable circumstances**

- I. Qualifying as an early career researcher (ECR), which REF has defined as starting one's career as an independent researcher on or after 1 August 2016
- II. Absence from work due to secondments or career breaks outside the higher education (HE) sector
- III. Qualifying periods of family-related leave
- IV. Junior clinical academics who have not gained a Certificate of Completion of Training by 31 July 2020
- V. Disability (including chronic conditions)
- VI. Ill health, injury or mental health conditions
- VII. Constraints relating to family leave that fall outside of the standard allowances
- VIII. Caring responsibilities (such as caring for an elderly or disabled family member)
- IX. Gender reassignment

If your ability to research productively during the assessment period has been constrained due to one or more of the above circumstances, you are asked to complete the attached form.

3. Work Related Circumstances

Please note that work related circumstances will not be used as mitigation in the REF but this should be discussed with line managers during the PDR process. Work related circumstances are those that may have impeded the production of research outputs which are **not** related to personal factors but to the range of duties undertaken.

4. Ensuring Confidentiality

If the University decides to apply to the funding bodies for either form of reduction of outputs (removal of the '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.

The University must ensure that there is sufficient evidence to satisfy that the circumstances are as claimed as this may be requested through audit. Therefore if evidence is required the HR/Equality Team specifically dedicated to manage the individual circumstances process will seek permission from the individual concerned to access their HR staff records.

The content of submitted data will be kept confidential by the UKRI REF team, the REF Equality and Diversity Advisory Panel (EDAP), and REF Main Panel Chairs. The data will be kept securely during the assessment phase but will be safely destroyed on completion of the assessment phase.

The UKRI REF team, the REF Equality and Diversity Advisory Panel (EDAP), the REF Main Panel Chairs and the University's Equality and Diversity Sub Group (EDSG) will be subject to confidentiality arrangements.

5. Changes in circumstances

The University recognises that staff circumstances may change between completion of the declaration form and the census date for Category A staff (**31 July 2020**). If this is the case, then staff should e-mail REF-Equality@swansea.ac.uk to update the information provided.

6. Feedback about individual circumstances

Staff will receive feedback via email or letter on their individual circumstances' application from the University's Equality and Diversity Sub Group (EDSG).

The anonymised and aggregated results of the process, and any potential reduction of outputs allowed for the Unit of Assessment, will be discussed at the Unit of Assessment Test and Challenge meeting. No confidential information will be shared.

To submit this form you should email it to REF-Equality@swansea.ac.uk and the designated team within Human Resources will independently manage the forms and anonymise the same prior to their review and consideration by the University's Equality and Diversity Sub Group (EDSG):

Name: [Click here to insert text.](#)

Staff ID: [Click here to insert text.](#)

College / Department / Unit of Assessment: [Click here to insert text.](#)

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

Yes

No

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

Circumstance	Time period affected
Early Career Researcher (started career as an independent researcher on or after 1 August 2016). <i>Date you became an early career researcher.</i>	Click here to enter a date.
NOTE: this may predate employment at Swansea University, in which case please provide the name of the employer and the title of the role you held.	Click here to insert previous employer and role held.
Junior clinical academic who has not gained Certificate of Completion of Training by 31 July 2020	Tick here <input type="checkbox"/>
Career break or secondment outside of the Higher Education (HE) sector. <i>Dates and durations in months.</i>	Click here to enter dates and durations.
Family-related leave; <ul style="list-style-type: none"> statutory maternity leave statutory adoption/surrogacy leave Additional paternity or adoption leave or shared parental leave lasting for four months or more <i>For each period of leave, state the nature of the leave taken and the dates and durations in months.</i>	Click here to enter the nature of the leave, dates and durations.
Disability (including chronic conditions) <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>	Click here to enter text.

<p>Mental health condition <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>Ill health or injury <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>Constraints relating to family leave that fall outside of standard allowance <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></p>	Click here to enter text.
<p>Caring responsibilities <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></p>	Click here to enter text.
<p>Gender reassignment <i>To include: 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>Any other exceptional reasons e.g. bereavement (please limit to 300 words or append an additional document for consideration if exceeds word count) <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></p>	Click here to enter text.
<p>I attach supporting documents to support my application (not compulsory)</p>	List documents attached and attach with form

Please confirm, by ticking the boxes provided, that:

- The above information provided is a true and accurate description of my circumstances as of the date below.

I agree

- I realise that the above information will be used for REF purposes only. I understand that internally the form will be seen by the HR/Equality Team managing the IC process, and an anonymised version of my form by the Equality and Diversity Sub Group (EDSG).

I agree

- I realise it may be necessary to permit the HR/Equality Team to access my personal HR records, should it be deemed necessary, to seek evidence to support my application. Sensitive personal data will only be accessed with your further consent, if this is required.

I agree

- I realise it may be necessary to share the information with the REF team, the UK (external) REF Equality and Diversity Advisory Panel (EDAP), and UK REF Main Panel Chairs.

I agree

- I understand that if the circumstances exceed the threshold for discounting the 'minimum-of-one' output requirement (as discussed in the explanatory notes on the form above) then the EDSG will be required to share some of the information with the Central REF Team, the REF Strategy Group and the College Unit of Assessment Teams.

I agree

Name: Print name here

Signed: Sign or initial here

Date: Insert date here

I give my permission for an HR Business Partner to contact me to discuss my circumstances, and my requirements in relation to this / these conditions.

I give my permission for the details of this form to be passed on to the relevant contact within my College/Department/UoA. (Please note, if you do not give permission your department may be unable to make adjustments and put in place appropriate support for you should you require these).

I would like to be contacted by:

Email Insert email address

Phone Insert contact telephone number

Email & Phone Insert contact telephone number Insert email address

Appendix 1 – Proposed Process timeline

Steps	Date	
1	Early June 2019	Invitations to submit individual circumstances will be sent by HR/Equalities Team to all Category A staff (including ECR & Independent Researchers) or posted if individuals on absence leave / family related leave
2	12 th – 26 th June 2019	3 x REF Engagement sessions for all Category A (Individual circumstances)
3	End June 2019	Deadline for submission of individual circumstances declaration forms via REF-Equality@swansea.ac.uk .
4	July 2019	HR/Equalities Team to collate & anonymise Individual Circumstances forms
5	Beginning August 2019 (TBC)	EDSG team to meet, discuss anonymised Individual Circumstances forms and recommend UoA reductions (based on the tables in appendix 2)
6	12 th August 2019	Where appropriate individuals to receive feedback on Individual Circumstances and reminder re the appeals process
7	27 th August 2019 [noon]	Deadline for any appeals via REF-Equality@swansea.ac.uk .
8	6 th Sept 2019	Appeals Panel to sit
9	13 th Sept 2019	Emails/letters to individuals re outcome of appeal and update to REF Team
	End August/Beg September 2019	REF Team will receive anonymised data of individual circumstances and details of any individual that could be submitted with zero outputs and will then apply reduction tariffs to each UoA.
	September 2019	UoAs will receive details of reductions during Mini REF Test & Challenge meetings.
	During October 2019	UoAs to assess the effect that individual staff circumstances have had on the overall output pool and submit a reduction request to the REF SG
	31 st October 2019	Deadline for submission of reduction request vis REF@swansea.ac.uk
	During November 2019	REF SG will inform UoAs of decisions regarding the effect that individual staff circumstances have had on the UoA.
	Early 2020	REF SG to submit reduction requests to UKRI REF

Appendix 2 – Reduction for Staff Circumstances

1. Given the reduced output requirement for REF 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 (ECRs)

2. ECRs are defined in the 'REF 2021 Guidance on submissions' (REF2019/01, 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

Date at which the individual first met the REF definition of an ECR:	Output pool may be reduced by up to:
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

Total months absent between 1 January 2014 and 31 July 2020 due to a staff member's secondment or career break:	Output pool may be reduced by up to:
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 leave⁶, or shared parental leave⁷ 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.
 - 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.

⁶ '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'.

⁷ '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.

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 **Error! Reference source not found.** 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 160 e. in the ‘REF 2021 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.

APPENDIX 2 - Training and Communication Plans**Training**

Training	Target Audience	Scope of Training	Delivery	Timing
Key Principles of Equality and Diversity	REF Strategy Group, all UOA leads, Directors of Research, UOA REF teams, College REF Officers	Introductory grounding in key principles of equality, inclusion and diversity, including the potential impact of unconscious bias and ways of mitigating against it. This is a prerequisite for role- and REF-specific training below.	Swansea University on-line introductory module on Equality and Inclusion.	Pre-requisite for other training listed below.
An Introduction to the Code of Practice	REF Strategy Group all UOA leads, Directors of Research, UOA REF teams, College REF Officers Equality and Diversity Sub-Group Members of the Appeals committee	Introduction to the Code of Practice, with emphasis on the purpose and method for declaring and assessing individual staff circumstances and seeking reductions in outputs, and the fair and transparent selection of outputs for inclusion in the submission and, The identifying of independent researchers from staff on research only contracts.	Presentations delivered by Deputy Pro-Vice Chancellor, Central REF Team and HR	May 2019
REF aligned Equality and Diversity training	All REF eligible (Category A Staff)	REF specific EDI training including Individual circumstances consideration	Presentations delivered by Deputy Pro-Vice Chancellor HR/Equality Team	3 sessions delivered by 28 th June
REF aligned Equality and Diversity training (Mandatory for target audience)	Equality and Diversity Sub-Group Members of the Appeals committee	REF specific EDI training including Individual circumstances consideration and unconscious bias. Training will also include reference to fair selection, the Equality Act and fixed term and part time regulations. Training will make use of the Advance HE “Embedding Equality and Diversity in REF 2021” presentation information. This will ensure practical application is transparent, consistent and inclusive.	Presentations delivered by Deputy Pro-Vice Chancellor HR/Equality Team	By end of July 2019

REF aligned Equality and Diversity training (Mandatory for target audience)	REF Strategy Group all UOA leads, Directors of Research, UOA REF teams, College REF Officers	REF specific EDI training including confirmed Code of Practice, Individual circumstances considerations, unconscious bias. Training will also include reference to fair selection, the Equality Act and fixed term and part time regulations. Training will make use of the Advance HE “Embedding Equality and Diversity in REF 2021” presentation information. This will ensure practical application is transparent, consistent and inclusive.	Presentations delivered by Deputy Pro-Vice Chancellor HR/Equality Team	By July 2020
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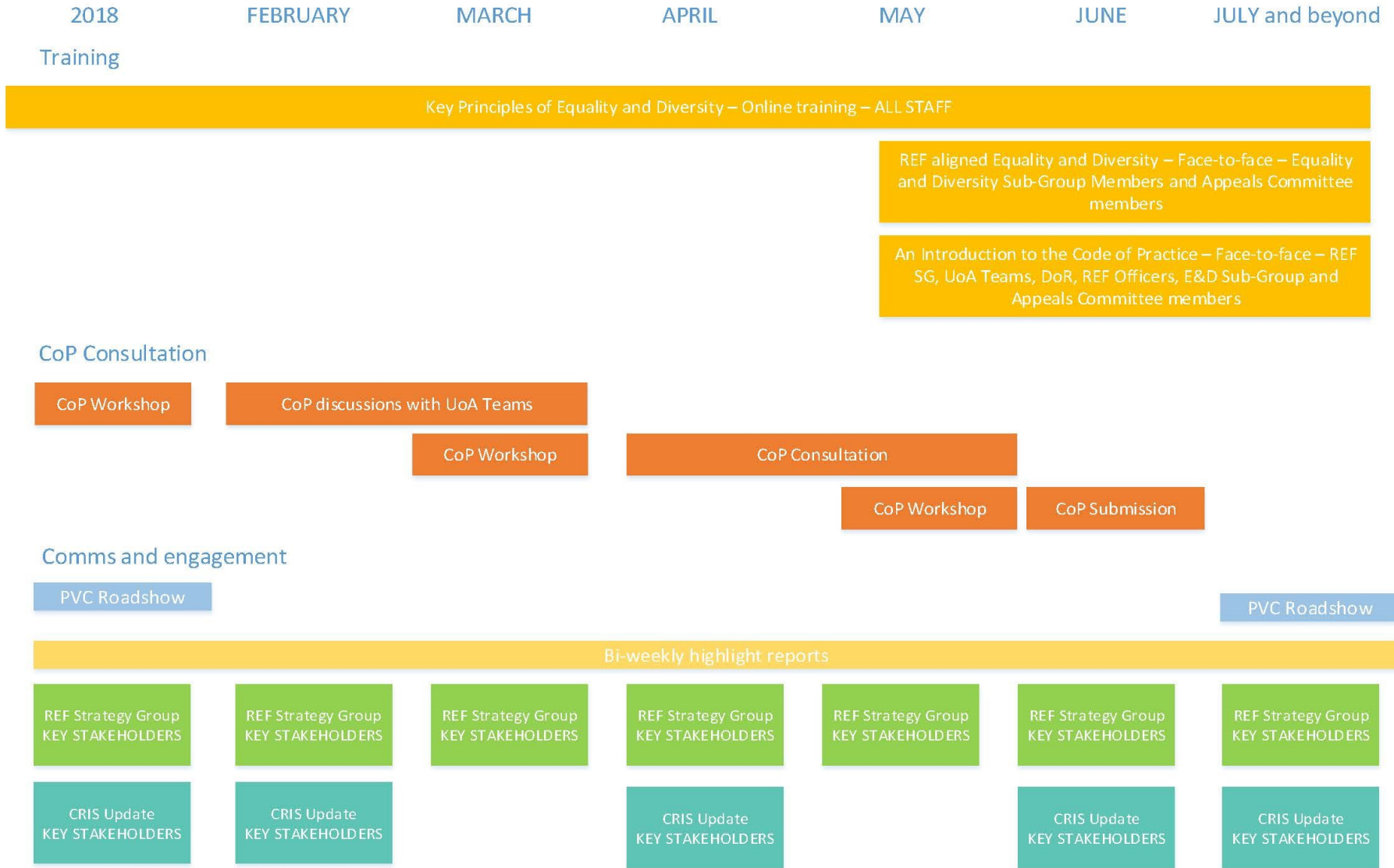
Communication

Activity	Purpose	Target Audience	Delivered by	Timing
Electronic circulation	To feedback on REF2021 draft guidance and panel criteria	Targeted at research and academic staff	Email	August and September 2018
PVC Forum	To introduce REF2021 in general, referring to draft guidance and provide opportunity to contribute to consultation. Differences from REF2014 highlighted	All staff, but targeted at research and academic staff	PVC, DPVC and Central REF Team	September and October 2018
Workshop	To discuss and feedback on draft guidance and panel criteria	College UoA teams and DORs	PVC, DPVC and Central REF Team	28 th September 2019
Workshop	Research Environment kick-off event	College UoA Environment leads, REF officers	DPVC, Environment Lead, Central REF Team	21 st November 2018
Meetings with UoA teams	Discuss aspects of Code of Practice	College UOA leads, DORs, REF officers	Central REF Team	February – March 2019



Workshop	Introduce sections of Code of practice for discussion	College UOA leads, DORs, REF officers	DPVC, Central REF Team	13 th March 2019
Electronic circulation	Receive feedback on complete Draft code of practice	Targeted at research and academic staff and UCU	Email	30 th April - 20 th May
Workshop	To discuss and feedback on the Draft Code of Practice	Targeted at research and academic staff	DPVC, Central REF Team	8 th May 2019
Electronic circulation	Invitation to declare individual circumstances	Targeted at research and academic staff	Email	June 2019
Drop in sessions	Provide information and context around declaration of Individual Circumstances	Targeted at research and academic staff including College UOA leads, DORs, REF officers	HR/Equalities Team, DPVC, Central REF Team	10 th – 28 th June 2019

In addition to the activities above, we will continue to engage with stakeholders through ad-hoc meetings and events, intranet banners and workshops. The REF Strategy Group will meet monthly to provide a steer on next steps and highlight reports will be used to keep senior management informed.



Appendix 3 - Data Protection Policy

Policy No.

Effective Date: May 25th 2018

Last Revised: March 2018

Review Date: May 25th 2019

Approval Body: University Management Board



Policy Owner: Registrar, Swansea University

Policy Author(s): Bev Buckley, Data Protection Officer

Gail Evans, IT Policy Lead

1. Definitions

Term	Definition
Personal Data	Data relating to a living individual who can be identified from the data, or from the data and other information which is in the possession of (or likely to come into the possession of) the Data Controller and includes any expression of opinion about the individual and any indication of the intentions of the Data Controller or any other person in respect of the individual.
Special Category Personal Data	Special Category Personal Data is personal data revealing an individual's racial or ethnic origins, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data for the purpose of uniquely identifying and individual, data concerning physical or mental health (including disabilities) or sexual life or sexual orientation.
Data Controller	The Data Controller is a person or organisation who determines the purposes for which, and the manner in which, any personal data are, or are to be, processed. For the purposes of this policy, the University is the registered Data Controller.
Data Processor	The Data Processor is any person (other than an employee of the Data Controller) who processes the data on behalf of the Data Controller e.g. a person or

	organisation that collects and processes data on behalf of the University under contract.
Processing	Data Processing is any operation on personal data, including obtaining, recording, holding, organising, adapting, combining, altering, retrieving, consulting, disclosing, disseminating, deleting, destroying and otherwise using the personal data.
Data Subject	The Data Subject is a living individual who is the subject of the personal data.
Consent	Valid Consent is any freely given, specific, informed and unambiguous indication of the individual's wishes by which they, by a statement or by a clear positive action, signify agreement to the Processing of personal data relating to them.
Third Party	A Third Party is any person other than the Data Subject, the Data Controller or any Data Processor or person authorised to process data for the Data Controller or Data Processor.
Personal Data Breach	A breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise Processed.
Privacy Notice	<p>Data protection laws require the Data Controller to provide detailed, specific information to the Data Subject about how and why their personal data is being processed (including the identity of the Data Controller and the Data Protection Officer, how and why the University will use, process, disclose, protect and retain that personal data). Such information must be provided through appropriate Privacy Notices.</p> <p>Privacy Notices should be provided at the point of collection of personal data and ideally via the same medium. The Data Subject should be notified of any change to a Privacy Notice. Given the level of engagement with external parties and industries, and the different programmes the University have</p>

	<p>ongoing, this may require regular review and management.</p> <p>Further information on Privacy Notices can be found on the Information Commissioner’s Office website:-</p> <p>http://ico.org.uk/for_organisations/data_protection/to_pic_guides/privacy_notices</p>
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2. Background

The General Data Protection Regulation (GDPR) will apply in the UK and the rest of the EU from 25 May 2018 and will replace the Data Protection Act 1998 (DPA). The GDPR is designed to harmonise and strengthen data protection law and practice across the EU. Like the DPA, it will be regulated in the UK by the Information Commissioner’s Office (ICO).

It will apply in the UK and is supplemented in by a Data Protection Bill that was introduced in Parliament in September 2017 and will become law by May 2018; amongst other things, the Bill legislates in those areas where the GDPR gives EU Member States the discretion to vary the rules, and it sets out the ICO’s regulatory powers in more detail.

Like the DPA, the GDPR sets out rules and standards for the use of information about living identifiable individuals and applies to all organisations in all sectors, both public and private. It doesn’t apply to anonymous information or to information about the deceased. The GDPR’s rules and standards are based around the existing DPA concepts of data protection principles and individual rights. Accordingly, many of the concepts in the GDPR and reflected in this document are updated from current provisions in the DPA.

3. Purpose

Swansea University holds personal data about job applicants, employees, workers, students, suppliers and other individuals for a variety of purposes.

This policy sets out how the University seeks to protect personal data and ensure staff and students understand the rules governing their use of personal data to which they have access in the course of their work and/or studies.

4. Scope

The policy applies to all staff and students, and all items of personal data that are created, collected, stored and/or processed through any activity of Swansea

University, across all areas including Schools, Colleges, Professional Services Units as well as wholly owned subsidiaries.

The policy covers, but is not limited to, Cloud systems developed or commissioned by Swansea University, any systems or data attached to University data or telephone networks, systems managed by Swansea University, mobile devices used to connect to the University networks or which hold University data, data over which Swansea University holds the intellectual property rights, data over which Swansea University is the data controller or data processor or electronic communications sent from Swansea University.

5. The Data Protection Principles

Everyone responsible for using data has to follow strict rules called 'data protection principles'. They must make sure the information is:

- used fairly and lawfully
- used for limited, specifically stated purposes
- used in a way that is adequate, relevant and not excessive
- accurate
- kept for no longer than is absolutely necessary
- kept safe and secure

In addition to the above principles, the University must also be able to demonstrate compliance with data protection legislation. This is commonly known as the 7th Data Protection principle.

Further guidance on the data protection principles is described in Appendix 1.

6. Conditions of Processing and Consent

In order for it to be legal and appropriate for the University to process personal data, at least one of the following conditions must be met:

- The data subject has given his or her consent
- The processing is required due to a contract
- It is necessary due to a legal obligation
- It is necessary to protect someone's vital interests (i.e. life or death situation)
- It is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.
- It is necessary for the legitimate interests of the controller or a third party and does not interfere with the rights and freedoms of the data subject (this condition cannot be used by public authorities in performance of their public tasks). It should be noted that under GDPR, universities are classified as public authorities and therefore the use of the 'legitimate interests' justification is not possible in terms

of Swansea University's core activities. It may be possible to use legitimate interests for processing that is undertaken *outside the University's core activities*.

All processing of personal data carried out by the University must meet one or more of the conditions above. There is stronger legal protection for more sensitive information, such as ethnic background, political opinions, religious beliefs, health, sexual health or criminal records. The Vice Chancellors Office can provide further advice on processing sensitive information.

Consent is defined as "any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she by statement or other clear affirmative action, signifies agreement to the processing of personal data relating to him or her". The GDPR clarifies that silence, pre-ticked boxes or inactivity does not constitute consent.

Anyone who has provided consent has the right to revoke their consent at any time.

The Data Protection Officer can provide further advice on obtaining consent.

7. The Rights of an Individual

The University will ensure that personal data is processed in accordance with the rights of Data Subjects under data protection law. An individual has the right to:

- receive certain information about the University's processing activities in a Privacy Notice (see Appendix 2)
- request access to their personal data that the University holds, via a subject access request
- ask the University to erase personal data if it is no longer necessary in relation to the purposes for which it was collected or processed
- rectify inaccurate data or to complete incomplete data
- restrict processing in specific circumstances
- in limited circumstances, receive or ask for their personal data to be transferred to a Third Party in a structured, commonly used and machine-readable format
- withdraw Consent to Processing at any time
- prevent the University's use of their personal data for direct marketing purposes
- to challenge processing which has been justified on the basis of the University's legitimate interests or in the public interest
- request a copy of an agreement under which personal data is transferred outside of the EU
- object to decisions based solely on automated processing, which produces legal effects or significantly affects an individual
- prevent processing that is likely to cause damage or distress to the individual or anyone else
- be notified of a Personal Data Breach which is likely to result in high risk to their rights and freedom.

- make a complaint to the supervisory authority

Automated Processing and / or Decision Making

Staff must contact the Data Protection Officer and a DPIA must be carried out before any automated processing (including profiling) or automated decision-making activities are undertaken. Please see **Appendix 2** for further guidance.

8. The Accountability of the University

The GDPR is more prescriptive than the DPA about how organisations need to implement the above provisions and it also introduces a range of accountability requirements to encourage a proactive and documented approach to compliance.

Swansea University will:

- appoint a Data Protection Officer
- implement policies, procedures, processes and training to promote 'data protection by design and by default'
- have appropriate contracts in place when outsourcing functions that involve the processing of personal data
- maintain records of the data processing that is carried out across the organisation
- document and report personal data breaches
- carry out Data Protection Impact Assessment on 'high risk' processing activities

Further guidance on these areas is described in **Appendix 2**.

9. Policy Statements

Lawful processing of personal data is vital to the successful operation and reputation of Swansea University, and for maintaining the trust of our students, employees and other stakeholders. It is a critical responsibility that we take seriously at all times. The University is committed to protecting the rights and freedoms of individuals in accordance with the provisions of data protection legislation. In order to achieve this, the University shall ensure that personal data is handled appropriately and consistently.

The University is responsible for demonstrating compliance with the data protection principles. Compliance with the GDPR, and adhering to these principles is the responsibility of all members of the University.

The University collects personal data in the course of registering students, employing staff or providing services to customers. The University has to satisfy at least one of the conditions in the Act for the processing of personal data and ensure that the processing is fair.

All University users of personal data must ensure that all personal data they hold is kept securely. They must ensure that it is not disclosed to any unauthorised third party in any form, either accidentally or otherwise.

Cloud based services store information on servers that don't belong to the University, so it is important that users ensure that cloud services are compliant with University data protection and information security policies.

Individual areas within the University are responsible for ensuring the appropriate retention periods for the information they hold and manage, based on University Guidance (to be developed). Retention periods will be set, based on legal and regulatory requirements, sector and best practice guidance. A useful source of guidance is available at the JISC Higher Education Business Classification Scheme and Records Retention Schedules.

Personal data must only be kept for the length of time necessary to perform the processing for which it was collected. Once information is no longer needed it should be disposed of securely. Paper records should be shredded or disposed of in confidential waste and electronic records should be permanently deleted. If data is fully anonymized then there are no time limits on storage, from a data protection point of view.

Consent should be obtained using an 'opt-in' by the data subject rather than an 'opt-out'. This means that the University will not assume consent has been given simply by the absence of an objection.

Individuals providing their personal data to the University should be aware who the data controller is and what will be done with their data. Appropriate 'collection notices' or 'fair processing notices' will need to be provided. Advice can be sought from the Data Protection Officer if necessary.

The University will manage the personal data it processes in a secure way. This applies to paper and electronic records systems. Systems should be access controlled, staff appropriately trained and security processes should be developed and understood. Appropriate monitoring and reporting on data security risks, initiatives and developments will be undertaken by the University's management groups.

In the event that the University engages a third party as a 'data processor' for its personal data, a specific written contract with the supplier providing assurance of security provision will be in place. The University will not rely on supplier set 'terms and conditions'.

The University will consider the impact on data privacy during all processing activities. This includes implementing appropriate technical and organisational measures to minimise the risk to personal data.

The University will implement privacy by design when Processing personal data by implementing appropriate technical and organisational measures in an effective manner, to ensure compliance with data privacy principles.

Transfers of Personal Data Outside the EU

Personal data shall not be transferred to a country or territory outside the EEA unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

The GDPR lists the factors that should be considered to ensure an adequate level of protection for the data and some exemptions under which the data can be exported.

Information published on the internet must be considered to be an export of data outside the EU. This covers data stored in the cloud unless the service provider explicitly guarantees data storage only takes place within the EU.

The Information Commissioner's Office Guidance on the use of Cloud Computing should be consulted before any use of external computing resources or services via a network which may involve personal data.

Staff involved in transferring personal data to other countries should consult the Data Protection Officer.

Further guidance can be found in **Appendix 1**.

Direct Marketing

Direct marketing relates to the communication, regardless of the media employed, which directs advertising or marketing materials to individuals e.g. mail shots for fund raising, advertising courses etc.

Individuals must be given the opportunity to remove themselves from lists or databases used for direct marketing purposes. The University must cease direct marketing activity if an individual requests the marketing to stop.

Direct marketing must also comply with the Privacy and Electronic Communications (EC Directive) Regulations 2003 (PECR) which covers marketing via telephone, text and email. For more information about direct marketing and PECR please see the Data Protection Guidance. The Privacy and Electronic Communications (EC Directive) Regulations 2003 is due to be replaced by a new ePrivacy Regulation in 2018.

10. Records of Processing Activities

As a data controller, the University is required to maintain a record of processing activities which covers all the processing of personal data carried out by the University. Amongst other things, this record contains details of why the personal data is being processed, the types of individuals about which information is held, who the personal information is shared with and when personal information is transferred to countries outside the EU.

11. Children

Under GDPR the following restrictions apply to the processing of personal information relating to children:

- Online services offered directly to children require parental consent
- Any information provided to a child in relation to their rights as a data subject has to be concise, transparent, intelligible and easily accessible, using clear and plain language
- The use of child data for marketing or for profiling requires specific protection

The Data Protection Officer should be informed if any of the above activities are being contemplated.

12. Research

The GDPR adopts a “broad” definition of research, encompassing the activities of public and private entities alike. The GDPR aims to encourage innovation, as long as organisations implement appropriate safeguards. It is important that staff collecting data for research purposes process the data in line with the GDPR and University guidance.

13. Data Sharing

Certain conditions need to be met before personal data can be shared with a third party or before an external data processor is used to process data on behalf of the University.

As a general rule, personal data should not be passed on to third parties, particularly if it involves special categories of personal data but there are certain circumstances when it is permissible.

- Any transfers of personal data must meet the data processing principles, in particular it must be lawful and fair to the data subjects concerned (see **Data Protection Principles** above)

- It must meet one of the conditions of processing (see **Conditions of Processing and Consent** above).

Legitimate reasons for transferring data could include:

- a legal requirement
- necessary for the official core business of Swansea University
- if no other conditions are met, then consent must be obtained from the individuals concerned and appropriate privacy notices provided (see **Appendix 2**)
- the University is satisfied that the third party will meet all the requirements of GDPR, particularly in terms of holding the information securely

Where a third party is processing personal data on behalf of the University, a written contract must be in place. A contract is also advisable when data is being shared for reasons other than data processing so the University has assurances that GDPR requirements are being met.

Staff should consult with the Data Protection Officer if they are entering into a new contract that involves the sharing or processing of personal data.

Staff who receive requests for personal information from third parties such as relatives, police, local councils etc. should consult the Data Protection Officer.

14. Data Protection Breaches

The University will make every effort to avoid Personal Data Breaches and in particular the loss of personal data. However, it is possible that mistakes will occur on occasion. What is important in these circumstances is that the University responds appropriately in accordance with the data protection laws.

The data protection laws require the University to notify Personal Data Breaches to the relevant supervisory authority (for our purposes, this will usually be the Information Commissioner's Office) 72 hours after first becoming aware of the incident and to the individual Data Subjects, in certain circumstances.

Staff should be aware that a failure to notify Personal Data Breaches to relevant supervisory authorities and Data Subjects in accordance with the requirements of the data protection laws may lead to fines of up to €10million or 2% of annual global turnover (whichever is the highest).

If staff know or suspect that a Personal Data Breach has occurred, they should not attempt to investigate the matter themselves. The University has a [Personal Data Breach Reporting Procedure](#) in place. Staff should be familiar with this procedure and immediately contact ISS in the event of a personal data breach in accordance with that procedure.

15. Responsibilities of Staff

All staff, who have responsibilities for the collection, access or Processing of Personal Data, should comply with the provisions of the applicable data protection laws in accordance with the principles outlined 0 above.

Line managers are required to make sure staff members are aware of the applicable data protection laws and the University's Data Protection Policy and seek out additional guidance and training via the Data Protection Officer.

All staff are responsible for ensuring that any personal data that they provide to the University in connection with their employment is accurate and up to date.

It is a condition of employment that all employees abide by the Data Protection Policy and failure to do so may therefore result in disciplinary action.

16. Responsibilities of Students

Students are required to ensure that where they provide their own personal data to the University, it is accurate and up-to-date.

Students must comply with the University's **Acceptable Use of IT Facilities and Systems Policy**. Failure to do so may therefore result in disciplinary action.

17. Data Protection Support

The Data Protection Officer is responsible for the day-to-day data protection queries and requests such as subject access requests, and is a point of contact for issues relating to data protection. The Data Protection Officer is also responsible for producing guidance on good data protection practice and in promoting compliance across the University. The Data Protection Officer will also provide training to individuals/groups upon request or where a need has been identified.

18. Related Policies

Title	Link
Information Security Consultancy – Security Policy	http://www.swansea.ac.uk/media/InformationSecurityPolicy%20June%202015.docx
Acceptable Use of IT Facilities and Systems Policy	TBA

19. Consequences of a Breach

Any breach of the policy may result in the University, as the Data Controller, being liable in law for the consequences of the breach. In addition, breach of this policy by staff or students may be considered to be a disciplinary offence and may be dealt with according to the University's disciplinary procedures. Failure to comply with this policy may result in disciplinary action up to and including termination of employment or studies.

20. Policy History

Revision Date	Author	Description
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Appendix 1

The Seven Data Protection Principles

(a) **Principle 1 - Personal Data must be processed lawfully, fairly and in a transparent manner**

The University will ensure that data is obtained fairly and in a transparent manner by providing a Privacy Notice to Data Subjects either at the point of collection where the personal data is collected directly from the Data Subject, or at the first communication with the Data Subject or within 1 month of receiving the personal data (whichever is earlier) where the personal data are received from a Third Party.

The Privacy Notice will set out about how and why their personal data is being processed (including the identity of the Data Controller and the [Data Protection Officer], how and why the University will use, process, disclose, protect and retain that personal data) and will be concise, transparent, intelligible, easily accessible, and in clear and plain language so that Data Subjects can easily understand it (see separate guidance on Gathering Personal Data)

Information about how the University processes data relating to students is contained within the [Student Privacy Notice](#). This explains to students what personal data the University collects about them, how their data will be used by the University, with whom their data may be shared with and what their rights and responsibilities are in regard to their data.

In order for Processing to be lawful, personal data (which is not Special Category Personal Data) will only be processed by the University if one of the following conditions, has been met:

- (i) The Data Subject has given his or her Consent;
- (ii) The Processing is necessary for the performance of a contract between the University and the Data Subject;
- (iii) To meet the University's legal compliance obligations;
- (iv) To protect the Data Subject vital interests;
- (v) For the performance of a task in the public interest;

- (vi) To pursue the University's legitimate interests, where these interests are not overridden because the Processing prejudices the interests or fundamental rights and freedoms of the Data Subject(s). The purposes for which the University Processes personal data for legitimate interests (if applicable) need to be set out the Privacy Notices.

(The use of the Legitimate Interests condition can only be applied where processing does not fall within the University's core function).

The Processing of Special Category Personal Data is prohibited unless an alternative legal basis for Processing is met. Processing of Special Category Personal Data will only be carried out by the University if one of the following applies:

- (i) The Data Subject has given his/her explicit Consent.
- (ii) The Processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the Data Controller or the Data Subject in the field of employment and social security and social protection law.
- (iii) The Processing is necessary to protect the vital interests of the Data Subject or another person.
- (iv) The processing is carried out in the course of its legitimate activities with appropriate safeguards by a foundation, association or any other not-for-profit body with a political, philosophical, religious or trade union aim and on condition that the processing relates solely to the members or to former members of the body or to persons who have regular contact with it in connection with its purposes and that the personal data are not disclosed outside that body without the consent of the data subjects;
- (v) The Processing relates to personal data which has been made public by the Data Subject.
- (vi) The Processing is necessary for the establishment, exercise or defence of legal claims.
- (vii) The Processing is necessary for reasons of substantial public interests on the basis of UK law.
- (viii) The Processing is necessary for the purposes of preventative or occupational medicine, for the assessment of the working

capacity of the employee, medical diagnosis, the provision of health or social care or treatment or management of health or social care systems and services.

- (ix) Processing is necessary for reasons of public interest in the area of public health.
- (x) Processing is necessary for archiving purposes in the public interests, scientific or historical research purposes or statistical purposes provided that the Processing is proportionate to the aim pursued, respects the essence of the right to data protection and provides for suitable and specific measures to safeguard the fundamental rights and the interests of the Data Subject.

- (b) **Principle 2 - Personal Data will be held for specified, explicit and legitimate purposes and must not be further processed in a manner incompatible with that purpose or purposes for which they are processed.**

The University will ensure that personal data which is obtained for a specified purpose is not used for different or incompatible purposes from those disclosed when the personal data was first obtained, unless the Data Subjects have been informed of the new purposes and legal basis being relied upon (if this legal basis is Consent, appropriate Consent must be obtained).

- (c) **Principle 3 - Personal Data shall be adequate, relevant and limited to what is necessary in relation to the purpose or purposes for which they are processed**

The University will ensure that it collects only the minimum personal data necessary for the purpose or purposes specified and will not collect or hold data on the basis that it might be useful in the future.

- (d) **Principle 4 - Personal Data shall be accurate and, where necessary, kept up to date**

The University will take reasonable steps to ensure the accuracy of personal data which it holds, and will take steps to amend, update or correct inaccurate data when requested to do so by a Data Subject. personal data will be inaccurate where it is incorrect or misleading as to any matters of fact.

- (e) **Principle 5 - Personal Data processed for any purpose shall not be kept for longer than is necessary for that purpose**

The University will ensure that personal data is not kept for longer than is required by the purpose or purposes for which the personal data was gathered.

Staff must ensure that personal data is securely destroyed once the purpose or purposes for Processing has come to an end and there is no legal requirement or valid operational reason for its continued retention (see separate guidance on Retaining Personal Information).

The University may retain certain personal data indefinitely for research purposes (including historical or statistical purposes) as permitted under the data protection law (see separate guidance on the use of personal data in research).

(f) **Principle 6 - Appropriate technical and organisational measures shall be taken to prevent the unauthorised or unlawful processing of Personal Data and the accidental loss, destruction of, or damage to, Personal Data**

The University will take reasonable and appropriate steps to ensure the security of personal data which are held electronically and in manual form, to prevent unlawful or unauthorised Processing of personal data and against the accidental loss of, or damage to, or destruction of personal data. Please see additional information on data security for specific guidance.

The University will take reasonable and appropriate steps to maintain data security by protecting the confidentiality, integrity and availability of the personal data, defined as follows:

- (i) Confidentiality means that only people who have a need to know and are authorised to use the personal data can access it.
- (ii) Integrity means that personal data is accurate and suitable for the purpose for which it is processed.
- (iii) Availability means that authorised users are able to access the personal data when they need it for authorised purposes.

The University will regularly evaluate and test the effectiveness of those safeguards to ensure security of our Processing of personal data

(g) **Principle 7 – The Data Controller shall be responsible for, and able to demonstrate compliance with the other data protection principles (the accountability principle).**

The University will ensure that appropriate technical and organisational measures are implemented to ensure compliance with data protection principles

The University will have adequate resources and controls in place to ensure and to document data protection law compliance including:

- (i) Appointing a suitably qualified DPO
- (ii) Implementing data protection by design and default when Processing personal data to ensure compliance with applicable data protection laws.
- (iii) Completing Data Protection Impact Assessments (DPIAs) to identify and reduce risks of a data Processing activity, where Processing presents a high risk to rights and freedoms of individuals. DPIAs should be conducted for all major system or business change programs involving the Processing of personal data particularly those involving new initiatives or technology.
- (iv) Integrating data protection into internal documents, policies and procedures including this Data Protection Policy;
- (v) Regularly training staff on applicable data protection law, this Data Protection Policy, related policies and guidelines and data protection matters including, for example, individual rights, Consent, legal basis, DPIAs and Personal Data Breaches; and
- (vi) Regularly testing the privacy measures implemented and conducting periodic reviews and audits to assess compliance, including using results of testing to demonstrate compliance improvement effort.

Limitations on transfers of Personal Data outside the European Union (EU)

Data protection law restricts data transfers to countries outside the European Union, to third countries or international organisations in order to ensure that the level of data protection afforded to individuals is not undermined. Personal Data is transferred from the originating country across borders when it is transmitted, sent, viewed or access in a different country.

Personal Data should only be transferred the EU if one of the following conditions applies:

- The European Commission has issued a decision confirming that the country to which the Personal Data is transferred ensures an adequate level of protection for the individuals' rights and freedoms (an 'adequacy decision').
- The Personal Data is transferred under the EU-US Privacy Shield.
- Appropriate safeguards are in place. Adequate safeguards may be provided for by:
 - a legally binding agreement between public authorities or bodies;
 - binding corporate rules (agreements governing transfers made between organisations within in a corporate group);
 - standard data protection clauses in the form of template transfer clauses adopted by the Commission;
 - standard data protection clauses in the form of template transfer clauses adopted by a supervisory authority and approved by the Commission;
 - compliance with an approved code of conduct approved by a supervisory authority;
 - certification under an approved certification mechanism as provided for in the GDPR;
 - contractual clauses agreed authorised by the competent supervisory authority; or
 - provisions inserted into administrative arrangements between public authorities or bodies authorised by the competent supervisory authority.

Further information about the European Commission's list of approved countries and the standard contractual clauses is available on the Information Commissioner's Website <https://ico.org.uk/for-organisations/guide-to-data-protection/principle-8-international/>

Data protection law also contains a number of exemptions to the limitations on transfers of Personal Data outside the EU (regardless of the country to which the Personal Data are transferred or the receiving organisation). The exemptions are as follows:

- The Data Subject has given his/her explicit Consent to the transfer after having been informed of the possible risks of such transfers due to the absence of an adequacy decision and appropriate safeguards.
- The transfer is necessary for the performance of a contract between the Data Subject and the University or the implementation of pre-contractual measures taken at the Data Subject's request.

- The transfer is necessary for the conclusion or performance of a contract concluded in the interest of the Data Subject between the University and Third Party.
- The transfer is necessary for important reasons of public interest.
- The transfer is necessary for the establishment, exercise or defence of legal claims.
- The transfer is necessary in order to protect the vital interests of the Data Subjects or other individuals.
- The transfer is part of Personal Data on a public register.

As the University is a public authority, the availability of the exemptions outlined in (a), (b) and (c) above are limited.

Further guidance should be sought from the Data Protection Officer in relation to transferring of Personal Data outside the EU.

Appendix 2

Privacy Notices

Under the 'fair and transparent' requirements of the first data protection principle, the University is required to provide data subjects with a 'privacy notice' to let them know what it does with their personal data.

Privacy notices are published on the University website and are therefore available to staff and students from their first point of contact with the University. Any processing of staff or student data beyond the scope of the standard privacy notice, or processing of the personal information of any other individuals will mean that a separate privacy notice will need to be provided.

Further information on what information should be included in a privacy notice is provided in the Data Protection Guidance.

Data Protection by Design

Under the GDPR the University has an obligation to consider the impact on data privacy during all processing activities. This includes implementing appropriate technical and organisational measures to minimise the risk to personal data.

It is particularly important to consider privacy issues when considering new processing activities or setting up new procedures or systems that involve personal data. GDPR imposes a specify 'privacy by design' requirement, emphasising the need to implement appropriate technical and organisational measures during the design stages of a process and throughout the lifecycle of the relevant data processing to ensure that privacy and protection of data is not an after-thought.

For further information concerning techniques that can be used to reduce the risks associated with handling personal data, including 'Anonymisation and Pseudonymisation', see the Data Protection Guidance.

The University will assess what privacy by design measures can be implemented on all programs/systems/processes that process personal data by taking into account the following:

- the state of the art (i.e. the highest level of general development, as of a device, procedure, process or technique achieved at the particular time);
- the cost of implementation;
- the nature, scope, context and purposes of Processing; and
- the risks of varying likelihood and severity for rights and freedoms of Data Subjects posed by the Processing.

Data Protection Impact Assessments (DPIAs)

The DPIA is a mechanism for identifying and examining the impact of new initiatives and putting in place measures to minimise or reduce risks.

For some projects, the GDPR requires that a Data Protection Impact Assessment (DPIA) is carried out. The types of circumstances when this is required include:

- those involving processing of large amounts of personal data, where there is automatic processing/profiling, processing of special categories of personal data, or monitoring of publicly assessable areas (i.e. CCTV).

The University will conduct DPIAs in respect of Processing which is considered to be high risk (for example where Processing involves Special Category Personal Data on a large scale).

The Data Protection Officer should be informed and a DPIA undertaken when implementing major system or business change programs involving the Processing of personal data including:

- use of new technologies (programs, systems or processes), or changing technologies (programs, systems or processes);
- automated Processing including profiling and automated decision making;
- large scale Processing of Special Category personal data; and
- large scale, systematic monitoring of a publicly accessible area (e.g. under CCTV).

Further information about when and how to carry out a DPIA can be found in the Data Protection Guidance.

Use of Third Party Data Processors

The University will ensure that all third party data processing is done under a written contract. This is to ensure that both parties understand its responsibilities and liabilities. Contract clauses will be used in line with those outlined under data protection law.

The University is liable for its compliance with data protection legislation and will only appoint processors who can provide 'sufficient guarantees' that the requirements of data protection law will be met and the rights of data subjects protected.

Automated Processing and Decision Making

In general terms, automated decision-making is prohibited when a decision has a legal or similar significant effect on an individual unless:

- an individual has explicitly consented;
- the processing is authorised by law; or
- the processing is necessary for the performance of or entering into a contract with the individual.

If certain types of Special Category Personal Data are being processed, then grounds (b) or (c) will not be allowed but such Special Category Personal Data can be processed where it is necessary (unless less intrusive means can be used) for substantial public interest like fraud prevention.

If a decision is to be based solely on automated processing (including profiling), then Data Subjects must be informed in the Privacy Notice of the logic involved in the decision making or profiling, the significance and envisaged consequences. The Data Subject must also be and given the right to request human intervention, express their point of view or challenge (see guidance on Gathering Personal Data).

Data Subjects must also be informed that they have the right to object to this in the first communication with them (at the latest). This right must be explicitly brought to their attention and presented clearly and separately from other information.

Appendix 4: 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

Date at which the individual first met the REF definition of an ECR:	Output pool may be reduced by up to:
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

Total months absent between 1 January 2014 and 31 July 2020 due to a staff member's secondment or career break:	Output pool may be reduced by up to:
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 leave⁸, or shared parental leave⁹ 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.
 - 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.

⁸ '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'.

⁹ '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.

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.

Appendix 5 - Output Reduction Request Template

Swansea University

Research excellence Framework 2021

1	UoA	
2	Total UoA FTE	
3	Total number UoA staff	
4	Total number of staff with identified circumstances	
5	Number of outputs by which the UoA pool could be reduced	
6	Details of how the output pool has been “disproportionately affected” by declared circumstances	

Appendix 6 - Swansea University Staff Privacy Policy

1 General Information

We are committed to protecting the privacy and security of your personal information. Under data protection law, we are a “data controller”. This means that we hold personal information about you, and are responsible for deciding how we store and use that personal information.

As a data controller, we are legally required to provide certain information to individuals whose personal information we collect, obtain, store and use. That information is contained in this document (our “privacy notice”).

It is important that you read this document (together with any other privacy notices we may provide to you on specific occasions), so that you are aware of how and why we are using your personal information and the rights you have in relation to your personal information.

This Privacy Policy applies to all employees, volunteers, workers, secondees, work experience/placement students, affiliates, consultants, honorary appointment holders, interns and applicants to University positions.

We will comply with data protection law. This says that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

2 What Personal Information do we hold about you?

As an employee, a volunteer, worker, secondee, work experience/placement student, affiliate, consultant, honorary appointment holder, intern or applicant to a University position, the University we will ask you to provide us with certain personal information relating to you at the outset of you commencing work for us and during the course of your employment/engagement.

Data protection law protects personal information which is essentially any information from which an individual can be identified. There is a type of personal information which receives additional protection because of its sensitive or private nature, this is sometimes referred to as ‘special category personal information’ such as personal information about an individual’s race, ethnic origin, political opinions, religious or philosophical beliefs, trade union membership (or non-membership), genetics information, biometric information (where used to identify an individual) and information concerning an individual’s health, sex life or sexual orientation.

This information is collected either directly from candidates or sometimes from an employment agency or background check provider. We may sometimes collect additional information from third parties including former employers, credit reference agencies or other background check agencies, pension administrator, medical professionals, other employees, the Home Office, the Disclosure and Barring Service, intranet and internet facilities, relevant professional bodies.

The information we will collect during your employment/engagement with us will include:

- your name, address and contact details
- your date of birth
- your gender
- your photo
- your family details

- your education and qualifications
- your skills, experience and membership of professional bodies
- your National Insurance number and tax code
- your emergency contact details and next of kin
- your bank details, payroll details and tax status information
- your salary, annual leave, pension and benefits details
- evidence of your ability to work in the UK, your nationality and immigration status
- your driving license
- information provided about you from your previous employer(s) and other referees
- your employment history
- information collected during the recruitment process that we retain during your employment
- your working terms and conditions (e.g. pay, hours of work, holidays, benefits)
- details of any other offices or appointments or business interests you hold
- any accidents connected with work
- any training you have undertaken
- any disciplinary, grievance or other issues relating to your employment or in relation to which you are able to provide information
- your attendance record and leave taken (e.g. holiday, sickness absence, family leave)
- your performance reviews
- any other personal information you share with us, including lifestyle and social circumstances
- any reasonable adjustment(s) made to your role or your work under the Equality Act 2010
- CCTV footage and any other information obtained through electronic means
- Information about your use of our IT, communication and other systems
- Details of your use of business related social media such as LinkedIn, Twitter, Facebook and Instagram
- Details of any media reports or pieces relating to yourself and/or the University

3 What will we use your personal information for and what are our legal bases for doing so?

We use the personal information we hold about you for a number of different purposes, which we list below. Under data protection law we need to have a valid legal basis for using your personal information, we also set out below the legal bases which we will be relying upon.

3.1 We use the personal information we hold about you for the following reasons:

- to comply with and demonstrate compliance with our legal obligations, such as checking you are legally entitled to work in the UK, deducting PAYE and National Insurance contributions, complying with equality legislation and other employment laws
- to prevent fraud
- to comply with corporate responsibility obligations
- to comply with and demonstrate compliance with any regulatory requirements

In these cases, the legal basis that we will be relying upon to process your personal information will be because it is necessary for us to do so to comply with our legal obligations.

3.2 We will also use the personal information we hold about you for the following reasons:

- to comply with and enforce our contract with you and inform you of any changes
- to pay you and provide you with any benefits you are entitled to including pension
- to deal with any disciplinary and grievance issues which may arise relating to you or in respect of which you may be able to provide relevant information
- to record your absences from work and your leave
- to review and manage your performance and development
- to promote our services including academic excellence
- for general employment or contract administration purposes

- to monitor compliance with any of our policies and procedures
- to conduct performance reviews, manage performance and determining performance requirements
- to make decisions about salary reviews and compensation
- to assessing qualifications for a particular job or task, including decisions about promotions
- to gather evidence for possible grievance, conduct or capability hearings
- to make decisions about your continued employment or engagement
- to make arrangements for the termination of our working/honorary relationship
- to ensure appropriate security measures are in place

In each of these cases the legal basis that we will be relying upon to process your personal information will be because it is necessary for the performance of the contract between us or because it is necessary for compliance with a legal obligation

3.3 We will also use the personal information we hold about you for the following reasons:

- To respond to requests for information from outside organisations, such as HEFCW, HEFCE, HESA, ATHENA Swan
- To keep an accurate account of meetings in University minutes

In this case the legal basis that we will be relying upon to process your personal information will be because it is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller

3.4 We will also use the personal information we hold about you for the following reasons:

- to enable business management and planning, including accounting and auditing
- to assess education, training and development requirements
- to respond to reference requests
- to monitor your use of our information and communication systems
- to ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution
- for identification purposes and to ensure, as far as is reasonably practicable, the security and safety of all students, staff, visitors and contractors, whilst within or situated on University premises
- to ensure accuracy with the use of personal data on core systems used within the University e.g. Colleague Attendance and RIS
- in case of an emergency or where the University has real concerns over the wellbeing of a member of staff as a result of absence without agreed prior leave and to provide support to employees
- to promote academic/research staff, their research and, by association the University for the Staff Profile System
- to conduct data analytics studies to review and better understand employee retention and attrition rates.
- to enable third party training modules
- to set up an account with iCOM who manage Our Uni Rewards on behalf of the University to ensure that every member of staff is aware of the range of benefits on offer as an employee.
- to provide Safezone with your email address to enable communications to you with regards to registering with the University's campus safety app.
- to collaborate with organisations of which the University is a member, including by way of example, the Universities' and Colleges' Employers Association (UCEA) or with which the University collaborates for the purpose of conducting salary surveys and benchmarking, such as Xpert HR

In these cases the legal basis that we will be relying upon to process your personal information will be because it is in our legitimate interests. Our specific legitimate interests are:

- to be a fair and reasonable employer in relation to your employment/engagement and our employment/engagement of others and be able to demonstrate good employment practice and/or
- to comply with and demonstrate compliance with our obligations as an employer and/or our policies and procedures relating to employees, volunteers, workers, secondees, work experience/placement students, affiliates, consultants, honorary appointment holders, interns or applicants to a University position and/or
- to ensure public safety including the security and safety of all students and staff, visitors and contractors and the prevention and detection of crime, apprehension and prosecution of offenders and/or
- to enable us to manage the University effectively and efficiently

3.5 Where staff have opted into the SWell Engagement Programme, personal data provided by staff members will be used to monitor environmental impacts, cost efficiencies and sustainability.

- In this case the legal basis that we will be relying upon to process your personal information will be consent.

4 What Special Category Personal Information do we hold about you?

We will need to keep certain special category personal information in relation to you which might be relevant to your employment, such as your:

- racial or ethnic origins
- political opinions
- religious or philosophical beliefs
- membership of a trade union
- physical or mental health (including details of any disability)
- sexual orientation
- details of any known disability
- commission or alleged commission of any offence, including the results of Disclosure and Barring Service ('DBS') checks

5 What will we use your special category personal information for and what are our legal bases for doing so?

We use the special category personal information we hold about you for a number of different purposes, which we list below. Data protection law prohibits us from processing any special category personal information unless we can satisfy at least one of the conditions laid down by data protection law. We also set out below the specific conditions we rely upon when processing special category data.

5.1 We use the special category personal information we hold about you for the following reasons:

- to monitor equality and diversity.

In this case the condition we rely upon for processing the information is to monitor equality and diversity which is necessary for reasons of substantial public interest, namely for the purposes of identifying or keeping under review the existence or absence of equality of opportunity or treatment between groups of people specified in relation to that category with a view to enabling such equality to be promoted or maintained.

5.2 We also use the special category personal information we hold about you for the following purposes:

- to comply with and demonstrate compliance with employment law and best practice and any other applicable laws
- to comply and demonstrate compliance with any regulatory requirements

- to deal with any conduct and grievance issues which may arise relating to you or others in respect of which you may be able to provide relevant information
- to record your absences from work
- to provide you with any health benefits you may be entitled to
- to assess your fitness for work
- to administer your trade union membership
- to make any reasonable adjustments to your role
- to provide relevant anonymised data to outside organisations (e.g. ATHENA Swan, Stonewall etc) to demonstrate University compliance with employment law and best practice
- to enable the administration of pension schemes
- to enable to administration of employee benefit schemes

In these cases, the conditions we rely upon for processing the information are because it is necessary for the purposes of carrying out the obligations and exercising specific rights in the field of employment law.

5.3 In cases where a claim has been brought against the University or there is a potential risk of a legal dispute or claim we may need to process your special category personal information where it is necessary for the establishment, exercise or defence of legal claims.

5.4 There may be circumstances where we need to process your special category personal information, particularly relating to your health, where it is necessary to protect your interests (or someone else's interests) and you are not capable of giving your consent.

5.5 We envisage that we will hold information about criminal convictions.

We will only collect information about criminal convictions if it is appropriate given the nature of the role and where we are legally able to do so. Where appropriate, we will collect information about criminal convictions as part of the recruitment process or we may be notified of such information directly by you in the course of you working for us.

We will only use information relating to criminal convictions where the law allows us to do so. This will usually be where such processing is necessary for reasons of substantial public interest, namely, preventing or detecting unlawful acts, protecting the public against dishonesty, preventing fraud or suspicion of terrorism or money laundering.

Less commonly, we may use information relating to criminal convictions where it is necessary in relation to legal claims, where it is necessary to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

6 Further general information about using your personal information

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

The University will only contact you using your personal contact details e.g. personal telephone number and personal email address where it is absolutely necessary to do so for example in the case of a welfare concern, or where you have provided your personal contact details to another member of staff in the expectation that they will use that information to make contact with you in relation to a work related matter. Personal contact details will not be shared with anyone else either intentionally or inadvertently (e.g. through use of a group distribution system). And that no confidential information will be sent to personal contact details unless they relate to the recipient and that the medium used is appropriate.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law. Some of the personal data we request will be because we have a legal or contractual requirement to obtain and use the information or it is necessary for us to obtain the information to be able to enter into a contract with you. An example of this would be under the Immigration, Asylum and Nationality Act 2006 we are required to satisfy ourselves that you have the right to work in the UK. Failure to provide certain information will prevent us from employing or engaging you or from performing the contract we have entered into with you.

We do not carry out any automated decision-making or profiling in relation to you.

7 [Who do we share your information with?](#)

Your personal data will be held by the HR department. Your personal data will be shared internally with other individuals and/or departments where this is reasonably necessary for the processing purposes set out in section 2 above. For example, it will be necessary to share some of your personal information with the Finance department in order to pay you and ISS to enable systems access and administration.

From time to time we will need to share your information with external people and organisations. We will only do so where we have a legitimate or legal basis for doing so and in compliance with our obligations under data protection laws.

Your information may be disclosed to:

- **Her Majesty's Revenue and Customs (HMRC)** in connection with your pay and benefits
- **Banks and other financial institutions** in connection with your pay and benefits
- **Pensions providers** for providing and administering your pension
- **Payroll provider** to enable us to pay you
- **Companies and businesses who provide or administer any benefits we offer**
- **Other Universities, project Collaborators and funders** for the purposes of financial administration of a research contract
- **Other people who help us** they include information technology experts who design and host third party systems such as Marshall Training, Safezone, Our Uni Rewards and JUMP who host our Swell Engagement Programme.
- **Our insurers and insurance brokers** who provide us with comprehensive cover against the risks of running a business
- **Employment and recruitment agencies and outplacement organisations**, for example, Meara Mann
- **Professional bodies and regulators**
- **Our professional advisors** including our accountants when they need it to give us their professional advice.
- **Occupational Health and other medical professionals including social and welfare organisations** to provide us with medical opinions in relation to any medical condition, illness or disability you may have or develop during the course of your employment/engagement
- **The Police, local authorities, the courts** and any other government authority if they ask us to do so (but only if us doing so is lawful).
- **Other people who make a subject access request**, where we are allowed to do so by law.
- **Complainants**, where this is necessary to respond to any complaints received
- **Private investigators**
- **Debt collection and tracing agents**
- **Where we are legally obliged to do so**, e.g. to comply with a court order
- **Prospective employers** in response to reference requests
- **Educational establishments, examination bodies, course providers** in relation to any training you undertake or have undertaken

- **Marketing service providers** who carry out marketing activities on our behalf
- **Your family or representatives**
- **Funding Councils**
- **Research funding bodies**

8 International Transfer of Your Information

We do not routinely transfer any of your personal data outside the EU. Any transfers that do occur will be done in line with the GDPR.

9 How Long Do We Keep Your Information For?

To make sure we meet our legal data protection and privacy obligations, we only hold on to your information for as long as we actually need it for the purposes we acquired it in the first place.

In most cases, this means we will keep your information for as long as you are employed or engaged by us and for a period of 7 years thereafter. The reason for keeping your personal data for this length of time is to comply with HMRC requirements and because of the fact that some claims can be brought up to 6 years after your employment/engagement ends.] For WEFO funded positions, we are required to retain personal data in line with the relevant WEFO retention schedule.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Please refer to our retention policy/schedule [<http://www.swansea.ac.uk/the-university/world-class/vicechancellorsoffice/compliance/recordsmanagement/>] for further details

10 Individual rights

Data protection legislation provides individuals with a number of different rights in relation to their data. These are listed below and apply in certain circumstances:

- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request data portability** of your personal information. In certain circumstances, you may have the right to require that we provide you with an electronic copy of your personal information either for your own use or so that you can share it with another organisation. Where this right applies, you can ask us, where feasible, to transmit your personal data directly to the other party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact:

Mrs Bev Buckley
Directorate Support Manager and Data Protection Officer
Vice-Chancellor's Office
Swansea University
Singleton Park
Swansea
SA2 8PP
Email: dataprotection@swansea.ac.uk

No fee usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

11 Ability to withdraw consent

Where your personal data is processed on the basis of your consent or explicit consent, you have the right to withdraw your consent to the processing at any time. You can do this by emailing the Data Protection Officer at dataprotection@swansea.ac.uk. Any withdrawal of consent will not affect the lawfulness of any processing of your personal data based on consent before the withdrawal is notified.

12 Consequences of not providing the data when based on statutory or contractual requirement

The University will not be able to enrol you as a member of staff if you refuse to provide the necessary information when based on contract or statutory requirement.

13 Accuracy

If any of your personal details change during your employment/engagement you should contact a member of the HR Department to notify them and provide them with the updated accurate information.

14 Updates to this privacy policy

We review the ways we use your information regularly. In doing so, we may change what kind of information we collect, how we store it, who we share it with and how we act on it.

Consequently, we will need to change this privacy policy from time to time to keep it accurate and up-to-date.

We will keep this policy under regular review to ensure it is accurate and kept up to date. This policy was last updated on 1/3/2019.

15 About Us

Swansea University an institution established by Royal Charter of Singleton Park, Swansea, SA2 8PP

We are the data controller of the information you provide us with. The term "data controller" is a legal phrase used to describe the person or entity that controls the way information is used and processed.

16 [Where to Go if You Want More Information About Your Rights or to make a Complaint](#)

The Information Commissioner's Office (ICO) regulates data protection and privacy matters in the UK. They make a lot of information accessible on their website and they ensure that the registered details of all data controllers such as ourselves are available publicly. You can access them here http://www.ico.gov.uk/for_the_public.aspx.

You can make a complaint to the ICO at any time about the way we use your information. However, we hope that you would consider raising any issue or complaint you have with us first. We will always do our very best to solve any problems you may have.

17 [Contact us](#)

You're welcome to get in touch with us to discuss your information at any time.

We have appointed a [data protection officer (DPO)] to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the DPO :-

Mrs Bev Buckley
Directorate Support Manager and Data Protection Officer
Vice-Chancellor's Office
Swansea University
Singleton Park
Swansea
SA2 8PP
Email: dataprotection@swansea.ac.uk

Appendix 7 –

SWANSEA UNIVERSITY STRATEGIC EQUALITY PLAN 2016-2020

1. FOREWORD

Swansea University recognises that it has a major role to play in promoting equality of opportunity which is wholly compatible with, and contributes to, the achievement of its mission.

Our mission:

To provide an environment of research excellence, that is world-leading, globally collaborative and internationally recognised;

To deliver an outstanding student experience, with research-led and practice-driven teaching of the highest quality to produce graduates educated and equipped for distinguished personal and professional achievement nationally and internationally.

To use our research strength, collaboration with industry and global reach, to drive economic growth, foster prosperity, enrich the community and cultural life of Wales and, contribute to the health, leisure and wellbeing of its citizens.

In pursuit of our ambition we will strive to provide a working and learning environment that utilises all our talent and enables all staff and students to fulfill their personal potential.

We aim to provide an inclusive institutional culture where differences are shared and valued and where discrimination is challenged and eliminated.

In order to achieve these aspirations we must consider the needs of all recipients of higher education provision, in shaping policy, in delivering services, and in relation to our own employees. To this end, The Strategic Equality Plan 2016-2020 will be a key tool for leaders and managers and it must continue to be a catalyst for real change in the way that the University conducts its work, and the way that policy and services are designed and delivered.

Swansea University operates to a defined set of Professional Services Core Values where we take pride in being professional, working together and delivering a personalised and positive experience. Commitment to these values at Swansea University supports us in promoting equality and valuing diversity.

We regard this document as part of our continuing effort to provide high quality education to the widest possible constituency. This Strategic Equality Plan will contribute toward a society that enables people to fulfill their potential no matter what their background or circumstances, including their socioeconomic background and circumstances. Our Strategic Equality Plan aims to ensure that the necessary efforts are made to deliver systemic change. Equality of opportunity and fostering respect is a central aim of Swansea University and I commend this Strategic Equality Plan as part of the university's overall commitment to equality.

SIGNED VICE CHANCELLOR

2. SWANSEA UNIVERSITY – WHO WE ARE

The University's foundation stone was laid by King George V on 19 July 1920 and 89 students including eight female students enrolled that same year and was the UK's first campus university. Today the university provides a first class education and experience for over 15,000 students, and employs in excess of 3000 staff, across 6 academic Colleges and sited across two campuses – the Singleton Park Campus and the new Bay Campus, which opened in 2015.

Ranking in the UK Top 10 for Student Satisfaction (NSS, 2015), the University offers hundreds of degree schemes in a variety of subject areas and is now positioned in the UK Top 30 in the 2014 Research Excellence Framework League Table where it had a third of all research judged as 'World Leading' (the top rating).

Swansea University was voted 3rd for 'University of the Year' in the WhatUni Student Choice Awards 2015 and 1st in 2014. We have a 5-star rating for teaching quality (from QS Stars global university ratings system) and we are also listed as one of the UK's Top 15 Universities for Graduate job prospects, with 94% of Graduates in employment or further study within 6 months of graduating.

3. THE EQUALITY ACT 2010

General Equality duties (UK wide)

The Equality Act 2010 came into force in October 2010. It places an equality duty on public sector bodies such as Swansea University. In the exercise of its functions, a public body must have due regard to the need to:

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

The general duty covers the following protected characteristics: Age, Disability, Gender reassignment, Pregnancy and maternity, Marriage and civil partnership (in respect of the requirement to have due regard to the need to eliminate discrimination), Race, Religion and belief, Sex and Sexual orientation.

Public Sector Equality Duties (Wales)

The public sector equality duty in Wales came into force in 2011. The specific equality duties in Wales were guided by four principles: **the use of evidence, consultation and involvement, transparency and leadership.**

The aim of the public sector equality duty is to ensure that public bodies and those carrying out a public function consider how they can positively contribute to a fairer society through advancing equality and good relations in their day-to-day activities. The duty ensures that equality considerations are built into the design of policies and

the delivery of services and that they are kept under review to achieve better outcomes for all.

To meet the specific duties, Welsh public sector organisations, including Swansea University need to:

- create an evidence base relevant to their functions
- engage staff, students and other people
- assess the impact of policies and practices
- develop pay difference objectives
- develop equality objectives
- report on compliance with the duty and
- embed equality into all functions.

To evidence how they are meeting the general and specific duties, public bodies in Wales are required to develop and publish a Strategic Equality Plan.

Welsh Language Measure

The principle of equality of treatment of Welsh and English is addressed in the University's Welsh Language Scheme, in line with the aims of the Welsh Language (Wales) Measure 2011 and via its planned systems and procedures to ensure compliance with the forthcoming Welsh Language Standards.

4. STRATEGIC EQUALITY OUTCOMES

Our first Strategic Equality Plan recognised that particular emphasis needed to be placed on collecting and developing our evidence base in order to take forward specific work in an informed way. To ensure that we addressed each protected characteristic we developed objectives against each separate protected characteristic, one each for students and staff. Whilst we believe this was the right approach to take at the start of our journey, we now believe that a high level strategic outcome approach based around common themes will drive us forward to 2020. This strategic plan will have key themes which will be supported by high level objectives and corresponding timely delivery plans. This fluid approach will enable us to continue to embed our current commitments whilst at the same time allow us to respond to emerging priorities.

Through consultation we have defined four Strategic Equality Outcomes:

- 1. As a consequence of eliminating discrimination, advancing equality of opportunity and fostering good relations amongst the diverse staff and student groups the University will have achieved external recognition and/or accreditation through Athena Swan awards; Race Charter Mark awards; Stonewall Workplace Equality Index; and Disability Standard awards.**

2. **As a consequence of removing barriers to fair and meritocratic appointment and promotion the University will have a high performing workforce drawn from the widest pool of talent available.**
3. **As a consequence of removing barriers to fair and meritocratic appointment and promotion the University's high performing workforce will be characterized by gender equality in terms of pay, conditions and reward.**
4. **As a consequence of removing barriers to achievement for students with protected characteristics or disadvantaged as a result of socio economic background or other circumstances, the University will achieve external recognition for providing an excellent student experience.**

5. EQUALITY OBJECTIVES

The following objectives and steps will enable us to make progress towards achieving each of our strategic outcomes.

Outcome 1: As a consequence of eliminating discrimination, advancing equality of opportunity and fostering good relations amongst the diverse staff and student groups the University will have achieved external recognition and/or accreditation through Athena Swan awards; Race Charter Mark awards; Stonewall Workplace Equality Index; and Disability Standard awards.

Key milestones and objectives

- Athena SWAN College of Engineering Bronze Award – April 2016
- Athena SWAN College of Arts & Humanities Bronze Award – November 2016
- Athena SWAN College of Human & Health Science Silver Award– November 2016
- Athena SWAN Silver Institutional Award – April 2017
- Race Charter Mark Bronze Institutional Award – July 2017
- Athena SWAN College of Science Silver Award – November 2017
- Athena SWAN College of Law Bronze Award – April 2018
- Athena SWAN School of Management Bronze Award – November 2018
- Athena SWAN Medical School Silver Award renewal – November 2018
- Disability Standard Bronze Institutional Award – December 2019
- Stonewall Workplace Equality Index top 10 – July 2020

Outcome 2: As a consequence of removing barriers to fair and meritocratic appointment and promotion the University will have a high performing workforce drawn from the widest pool of talent available.

Key milestones and objectives

- Proportional submissions to the Research Excellence Framework (REF) 2020 for members of staff by the protected characteristics of gender, race and disability
- Gender balanced Council governance structures - by 2020
- A balanced workforce that is inclusive of all protected characteristics- by 2020
- All key appointment, selection and promotion decision makers to have undertaken unconscious bias training - by 2018
- Introduction of an annual staff survey aimed at identifying any barriers to staff reaching their full potential by protected characteristics – by 2017

Outcome 3: As a consequence of removing barriers to fair and meritocratic appointment and promotion the University's high performing workforce will be characterized by gender equality in terms of pay, conditions and reward.

Key milestones and objectives

- Gender balanced outcomes from annual academic promotions cycles
- Gender balanced appointment panels for academic and professional services staff – by 2020
- Annual action plans arising from monitoring of gender, race and disability pay gaps
- Implementing gender neutral recruitment literature and role definitions commencing 2016, by 2020.

Outcome 4: As a consequence of removing barriers to achievement for students with protected characteristics or disadvantaged as a result of socio economic background or other circumstances, the University will achieve external recognition for providing an excellent student experience

- Identify and reduce the Swansea University student attainment Gap for UK domiciled BME students to at least 3% below the Welsh national average (12%) – April 2020
- To be the highest rated university in Wales in the Stonewall Good University Guide
- Ensure there is equality of outcome for students of all protected characteristics within the Step4Excellence and subsequent programmes
- Ensure an equal and inclusive experience for students of all protected characteristics through the appropriate satisfaction surveys, planning for and taking action where required – commencing 2017
- Provide an annual programme of appropriate events and engagement activities to promote good relations between people of different religious faiths/no faiths across campuses – commencing 2016

6. PROMOTING THE GENERAL EQUALITY DUTY

This section details the ways in which Swansea University works as an organisation to promote the general duties of the legislation, including eliminating discrimination, harassment, and victimisation; advancing equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and fostering good relations between persons who share a relevant protected characteristic and persons who do not share it.

Performance Enabling & Training

In order to promote knowledge and understanding of both the general and Welsh Specific Duties amongst Swansea University employees, we will continue to:

- Provide equality and diversity training for new staff beginning employment with us as part of an induction process. There is a mandatory requirement for all staff to undertake an on line equality training package. Staff are able to access effective equality impact training and information on their roles and responsibilities under equality legislation. Equality and diversity training is provided for line managers and those making selection decisions. We also deliver appropriate training to HR staff, procurement staff and Council members.

Equality Impact Assessment

- We will continue to assess the likely impact of the work we do for its effect on people who share protected characteristics. Utilising standard documentation assessments are undertaken by policy holders and or those with responsibility for practice/procedure. Those reports that identify adverse impact are published in the University's Equal Opportunities Annual Report.

Relevant Equality Data

- We are required to periodically identify relevant information that we hold and also collect information that we do not hold. During the life of the previous Strategic Equality Plan (2012 – 2016) significant attempt was made to begin capturing data that previously had not been held. This data is now being routinely captured, however for some of the protected characteristics it may be a number of years before the data is significantly robust to rely on for accurate monitoring.

Engagement and consultation

In order to inform this new Strategic Equality Plan we have engaged and consulted with:

- Staff of all protected characteristics

- Students of all protected characteristics
- Students Union
- Trades Unions

We have done this via:

- Staff focus groups
- Student focus groups
- Staff surveys
- Student surveys
- Staff quantitative data
- Student quantitative data
- Benchmarking data such as Census and Equality Challenge Unit data
- University Equality Committee
- Athena SWAN representatives
- Race Charter Mark and staff network representatives
- Disability Working Group representatives
- LGBT+ Staff Network members
- Faith provision representatives

MONITORING AND REPORTING

Progress made against the objectives in this Strategic Equality Plan will be monitored by the University Equality Committee that meets 3 times per annum. This committee reports directly to Management Board, then to Council. Progress will be documented and published in the University's Equal Opportunities Annual Report which is then published on the University web pages by the April of each year.

Action plans relating to achievement of the above can be found at the links below:

- [Stonewall Workplace Equality Index](#)
- [University Athena SWAN Silver Application](#)
- [College of Engineering Athena SWAN Bronze Application](#)
- [College of Human and Health Sciences Athena SWAN Silver Application](#)
- [Medical School Athena SWAN Silver Application](#)
- [Equal Opportunities Annual Report 2016-2017](#)
- [Gender Pay Action Plan](#)