

Equality Impact Assessment

APPENDIX 1: The EIA Form

EIA Form

Name of Mechanism: REF 2029 Code of Practice

1. Area overseeing EIA

Research, Innovation and Enterprise [REF Strategy Group]

2. Lead Officer

REF Manager / REF Strategy Group

3. Date EIA started

- During the development of the Code of Practice : **30 March 2026 - 05 May 2026**

The EIA will be reviewed and updated throughout the REF cycle as documented below:

- Concurrently with decisions on the identification of staff with Significant Responsibility for Research (SRR) and Research Independence (RI): **During objective setting cycles - 2025-26 / 2026-27**
- Concurrently with decisions on the allocation of eligible contracts to Units of Assessment: **During Contract to UoA alignment decision-making – Autumn 2026 and 2027**
- **During the design and implementation of output selection processes – Summer 2028**
- **In relation to appeals and review mechanisms**

4. Is this a new or existing mechanism?

New (adaptation / enhancement of REF21 COP)

5. Does the mechanism impact on people?

Yes

6. What are the aims, objectives and purpose of the mechanism?

A Code of Practice (CoP) is a requirement for REF. It sets a minimum standard for participation. The CoP outlines how Edinburgh Napier University will make key decisions about the submission to the exercise. These decisions concern:

- a. identifying contracts that contribute to the REF volume measure (SRR and RI)

and

b. selecting research outputs for submission to the REF.

The CoP goes beyond procedural and legislative compliance and aims to embed a framework of principles in the key decisions that shape the University's REF 2029 submissions. The REF 2029 CoP supports the following principles:

- **Robustness**
- **Transparency**
- **Equity and inclusion**

7. Are there any associated objectives?

Although it is not a requirement from the UK funding bodies, our CoP also includes details about the identification and selection of REF 29 impact case studies. A separate EIA has been conducted on this process.

8. Who is intended to benefit from the mechanism and in what way?

- a. Academic, research and professional service staff by providing transparency about REF processes and decision-making.
- b. REF team by allowing us to manage the REF process in a consistent and organised manner
- c. University by enabling us to develop an optimised submission, working within the criteria from the UK funding bodies, whilst promoting fairness and good relations.

9. Is any data available about the mechanism?

An analysis of volume-contributing and non-volume contributing staff is underway using HESA 2024-25 staff data.

* Please note that this is data source is being used to test systems and is not accurate.

The HESA 2025-26 and 2026-27 REF data will be used to conduct an accurate analysis of volume-contributing and non-volume contributing staff profile by protected characteristic. Outcomes and Actions will be reported to the University Inclusion Committee and School Inclusion Forums.

10. How are you involving stakeholders/groups of interest in the EIA/development of the mechanism? **[Fostering good relations]**

In developing the content for the Code of Practice, the University has actively sought staff input and consulted with staff representatives through the following mechanisms:

- ✓ Discussion with the University's recognised Trade Unions
- ✓ Discussion through University-level and School/Service level Committees
- ✓ Dissemination of a final draft version of the Code of Practice to all staff, inviting comment through a Padlet collaborative board
- ✓ A series of on-Campus 'Demystifying REF' roadshows delivered to staff
- ✓ Dissemination to the University's Doctoral College – the oversight body for Doctoral students

- ✓ A REF-lections post REF21 project involving data, surveys and targeted focus groups to understand how the CoP was operationalised in REF21.

11. What challenges have identified?

Process for Identifying volume-contributing staff:

SRR – underpinned by established annual workload and research objective setting processes, whereby, If annual research allocation is 20% or greater than target workload = SRR.

RI – underpinned by annual research objective setting process / applying consistent measures of independence by one of three means (PI on external grant; Competitively- won fellowship or leading substantive research package)

Context:

1. Eliminate unlawful discrimination

[Avoid disproportionately excluding or disadvantaging people with protected characteristics]

2. Advance equality of opportunity

[All relevant staff groups have a fair opportunity to contribute to, benefit from, or be considered in this process]

3. Foster good relations

[Relevant staff groups have been consulted or engaged]

Challenge	Mitigation	Comment / Status
<p>The University's Objective setting and workload allocation policies allow flexibility / discretion in how Schools (Deans and Associate Dean R&I) allocate research time and set commensurate research objectives (including 'significant work packages for research independence).</p> <p>This could lead to inequalities based on professional or sub-discipline bias.</p> <p>There could be colleagues or groups of colleagues who do not know how to / or feel empowered to request research / research development workload (e.g. due to language, disability, caring responsibilities).</p>	<p>a. Deliver tailored 'EDI in Research' training to all Deans and Associate Deans, Research and Innovation, to enhance equitable application of academic workload / objective setting and application of reasonable adjustments</p> <p>b. Regular monitoring and reporting of School Research workload category allocations via the Academic Workload Steering Group, evidenced by workload data on R2 (research objective) and R2D (research development) distributions</p>	<p>EDI Training provision delivered to pilot group. Materials being updated to include CoP scenarios for further roll-out.</p> <p>Staff protected characteristic profiling report established – 2025-26 data anticipated by Aug 2026 [ongoing comms to promote declaration of characteristics]</p> <p>R2/R2D comms disseminated. Demystifying REF roadshows delivered.</p>

	<ul style="list-style-type: none">c. Heightened communications to the academic population to raise awareness and transparency of the School annual plans, Academic Workload Framework (AWF) and R2/R2D workload guidance, empowering academics to negotiate realistic workload allocation and work collegiately in the distribution of workload across the School.d. Transparency in workload allocation including visibility of WAM data across each School and quarterly meetings of the AWF steering group – co-chaired by University leadership and trade union.e. Analysis of volume-contributing (contracts classified as SRR or Independent) and non-volume contributing REF population by protected characteristic profile across REF census years 2025-26 and 2026-27, resulting in pro-active action / recommendations to School Inclusion Monitoring Forums.f. Heightened communications to explain REF de-coupling and empower staff to	
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	understand the new implications of volume measure and de-coupling in the context of setting personalised research objectives (with recognition of diverse output types, methods and contributions).	
Colleagues employed on G4 and G5 research contracts are exempt from the eligible pool because there is no expectation of self-directed research in their role descriptor. These colleagues could be disadvantaged from becoming RI in future.	a. Continue to implement HR in excellence action plan to advance careers in research.	

Appeals and Review process

This is underpinned by established appeals processes in Schools relating to workload and objective setting.

Colleagues are encouraged to negotiate proportionate and realistic workload objectives in agreement with their people manager. Disputes can be escalated to the Associate Dean R&I and Dean of School. The University Trade Union can assist in workload disputes.

Appeals process are communicated as part of the University's AWF and appraisal processes – accessible to all via the staff intranet.

Context:		
<ol style="list-style-type: none"> 1. Eliminate unlawful discrimination 2. Advance equality of opportunity 3. Foster good relations 		
Challenge	Mitigation	Comment / Status
Colleagues may not feel empowered to dispute workload due to accessibility barriers (e.g. language or disability).	<ol style="list-style-type: none"> a. Continue to promote the AWF documentation and annual appraisal processes so that colleagues are empowered to understand the guidance. b. Continue to work collegiately with Trade Unions to monitor workload processes and enhance operationalisation. 	<p>R2/R2D comms disseminated. Demystifying REF roadshows delivered.</p> <p>Quarterly meetings of Workload steering group occurring.</p>

<p>There could be a conflict of interest if Dean of School is the appeal decision-maker and sets overall workload policy.</p>	<ul style="list-style-type: none"> a. Deliver tailored ‘EDI in Research’ training to all Deans and Associate Deans, Research and Innovation, to enhance equitable application of academic workload / objective setting and application of reasonable adjustments b. Heightened communications to the academic and research population to raise awareness and transparency of the School annual plans, Academic Workload Framework (AWF) and R2/R2D workload guidance, empowering colleagues to negotiate realistic workload allocation and work collegiately in the distribution of workload across the School. c. Transparency in workload allocation including visibility of WAM data across each School and quarterly meetings of the AWF steering group – co-chaired by University leadership and trade union 	<p>EDI Training provision delivered to pilot group. Materials being updated to include CoP scenarios for further roll-out.</p>
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Process for selecting outputs for submission and representativeness

This process is underpinned by a 4-stage scoring process, including self-identification of eligible outputs alongside system reconciliation, internal, external and moderation.

Representativeness is premised on ensuring the submitted outputs reflect all established research infrastructures in the REF period (Research groups and centres), using systems-based

tagging functionality.

<p>Context:</p> <ol style="list-style-type: none"> 1. Eliminate unlawful discrimination 2. Advance equality of opportunity 3. Foster good relations 		
Challenge	Mitigation	Comment / Status
<p>The output selection process is reliant on self-identification of research outputs by authors. This means there could be specific individuals or groups of individuals who do not engage with the process or do not declare outputs for consideration because they underestimate the quality or eligibility of the output.</p>	<ol style="list-style-type: none"> a. Send wide-ranging and regular communications to target all output generating staff (including attempts to target specific groups – e.g. Professional Service staff / technicians / ECAs) b. Reconcile Worktribe output repository with the respondent survey responses and proactively target non-responders. c. Ensure that all output types and those produced in other language are included in eligible pool. d. Involve UoA leads and ADRI to promote local communications and engagement with process via local forums including targeted output discussion at MyContribution meetings e. Ensure timeline avoids periods of high leave or heavy workload. e. Deliver sub-panel specific training to all 	<p>REF panel criteria training delivered to all Schools / Departments in 2023, 2024, and 2026.</p> <p>Scoring rounds conducted in 2022, 2023, 2026 – all output types included.</p> <p>Creative practice template developed and being rolled out.</p>

	<p>research-generating colleagues about how to apply the REF assessment criteria using REF21 supplementary panel criteria and Annex K – to promote diverse research types, methods and contributions.</p> <p>f. Support creative practice / non-traditional output submission through portfolio format.</p>	
<p>The process allows for flexibility in the discipline-specific (UoA) quality thresholds at each stage of the process. This means there is risk of excluding some authors' outputs if their research output does not meet the unit threshold.</p>	<p>a. Clearly communicate the UoA-specific thresholds and the auditable rationale for applying a threshold cap</p> <p>b. Clearly communicate the principles of decoupling staff from REF so staff understand the rationale for thresholds to optimise quality</p> <p>c. Clearly record all decisions relating to threshold cut-off</p> <p>d. Conduct analysis of data on threshold cut-off, post-process to determine if any unintended consequences.</p> <p>e. Retain flexibility in process to include more outputs at a lower threshold, at a later stage</p> <p>f. Ensure timeline avoids periods of high</p>	<p>Scoring rounds conducted in 2022, 2023, 2026 – all output types included. Data analysis to follow.</p>

	<p>leave or heavy workload e.g. those with caring responsibilities may be absent during school holidays therefore avoid this period for the self-identification stage.</p>	
<p>The process is reliant on the appointment of expert panel members who can assess outputs fairly and equitably based on responsible assessment practices and EDI.</p>	<ul style="list-style-type: none"> a. Ensure that panel appointment criteria is appropriate and applied consistently b. Deliver training provision for all output scorers covering responsible assessment, principles for AI use and consistent application of the REF supplementary criteria c. REF Team to attend all panel meetings to ensure consistency and adherence to responsible assessment, challenging non-compliance. d. Conduct panel calibration to avoid inflation / deflation of scores. e. Promote eligibility of output types (Annex K) and outputs produced in other languages and seek translation / specialist assessors. f. Send creative practice outputs for iterative review – recognising quality can develop. 	<p>External assessors appointed using pre-requisite criteria.</p>

<p>Representativeness is reliant on consistent interpretation and application of research infrastructures / sub-disciplines using consistent application of qualitative and quantitative data to avoid rigid interpretation of subject areas.</p> <p>This could result in inequality of opportunity for groups of staff associated with specific subject groups if the criteria are not applied consistently. (e.g. for illustrative purposes - unintentionally excluding Midwifery could disproportionately impact on female authors).</p>	<ul style="list-style-type: none"> a. Deliver tailored ‘EDI in Research’ training to all REF decision-makers to enhance equitable application of REF criteria / panel descriptors. b. Introduce ‘representative’ pro-forma template to record decisions/ sign off. 	
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Process for allocation of eligible contracts and outputs to UoA

This process is premised on a principal alignment underpinned by our established research infrastructures in the REF period (research groups and centres), using systems-based tagging functionality.

<p>Context:</p> <ul style="list-style-type: none"> 1. Eliminate unlawful discrimination 2. Advance equality of opportunity 3. Foster good relations 		
Challenge	Mitigation	Comment / Status
<p>These processes are reliant on consistent interpretation and application of research infrastructures / sub-disciplines using consistent application of qualitative and quantitative data to avoid rigid interpretation of subject areas.</p> <p>This could result in inequality of opportunity for groups of staff associated with specific subject groups if the criteria are not applied consistently.</p>	<ul style="list-style-type: none"> a. Consistent application of the qualitative and quantitative decision-making data applied against the panel taxonomies and descriptors and using a pro-forma template b. An attempt to generate ‘representativeness’ unit level data prior to submission replicating that received by the REF panels c. Regular monitoring and reporting of staff 	

	<p>diversity profiling data across UoAs / subject groups or at Main panel level including contractual information relating to part time or fixed term contracts</p> <ul style="list-style-type: none">d. Heightened communications to explain REF de-coupling and to promote submission of interdisciplinary research to all potential eligible UoAse. Heightened communications to promote the interdisciplinary nature of the University research centres and groupsf. Heightened and transparent communication about output types and sub-disciplines-empowering staff and Heads of Subject to review and challenge the final submissiong. Deliver tailored 'EDI in Research' training to all REF decision-makers.	
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Other considerations

<p>Context:</p> <ol style="list-style-type: none"> 1. Eliminate unlawful discrimination 2. Advance equality of opportunity 3. Foster good relations 		
Challenge	Mitigation	Comment / Status
<p>REF leadership and Decision-making roles:</p> <p>There could be inequalities due to professional, personal or discipline-based biases.</p> <p>The allocation of resource and support may impact on leadership capacity.</p>	<ol style="list-style-type: none"> a. Appoint to leadership roles principally based on demonstrable expertise and knowledge. b. Deliver tailored 'EDI in Research' training to all REF decision-makers. c. Regularly review membership of decision-making groups and attempt to analyse profile / characteristics. d. Use consistent role descriptors, terms of reference and workload allocations. 	<p>EDI Training provision delivered to pilot group. Materials being updated to include CoP scenarios for further roll-out.</p> <p>Consistent role descriptors and ToRs in operation.</p>

1. Are there been any specific concerns about differential impact on any of the Protected Characteristic groups or other groups of interest¹?

1. There could be groups of staff who are less likely to request research time or engage in the self-identification process because they are less likely to rate their own work of high-quality or because they have no time to engage in the process. This could include but is not limited to females, early career staff, technicians, professional service staff or those on leave or those with a high workload.

¹ The Protected Characteristics covered by the Equality Act 2010 are: Age, Disability, Race, Religion and Belief (including no belief), Sex, Sexual Orientation, Pregnancy and Maternity, Gender Reassignment, Marriage and Civil Partnership. It is recommended that Deaf People and BSL Users be treated as a protected group. It may be that the mechanism seeks to address other groups of interest e.g. access and inclusion.

2. There is also risk that output panel assessors apply bias in their assessment of outputs based on author characteristic or other biases.

2. What steps are being taken to mitigate concerns raised about differential impact?

Mitigation:

- a. Send wide-ranging and regular communications to target all output generating staff
- b. Reconcile Worktribe output repository with the respondent survey responses and proactively target non-responders (or those on long-term absence)
- c. Involve UoA leads and ADRIIs to promote local communications and engagement with process
- d. Promote responsible assessment and train all panel members in EDI prior to assessment
- e. Promote 'blind' assessment – removal of author characteristics
- f. Continue to analyse volume-contributing and non-volume-contributing data to understand if any group/s are being unintentionally affected and apply actions accordingly.

3. Can differential impact be justified based on positive action guidance?

In support of our University values, the processes aim to avoid differential impact by applying the mitigations above.

4. The Equality Act 2010 includes a requirement to give 'due regard' to the public sector equality duty (PSED) in all functions. There is a specific duty to assess the impact of proposed new or revised policies and practices against three needs of the general duty. Use this section to outline relevant issues.

i) Eliminate unlawful discrimination, harassment and victimisation

See table above in relation to monitoring and training provisions.

ii) Advance equality of opportunity between people of different groups

See table above in relation to monitoring and training provisions.

iii) Foster good relations between people of different groups

See table above in relation to communication channels and training provisions

5. Date EIA Completed and date for future review of mechanism

March 2026

If the mechanism includes data collection refer to Data Protection Guidance.

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