REF 2029
Research Excellence Framework

University of CUMBRIA

REF 2029 Code of Practice

Submitted: 15 May 2026

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Section one: Our approach to the development of this Code of Practice

1.1 Introduction

This Code of Practice (CoP) sets out our Institutional approach to our Research Excellence Framework (REF) 2029 submission and how we have developed this to ensure fair, transparent, and inclusive processes for selection of outputs and for defining which categories of staff contribute to our volume measure, which will be calculated for REF2029 based on the Higher Education Statistics Agency (HESA) staff record. Our processes have been designed not only to meet regulatory and equality obligations, but also to support robust, evidence-based academic judgement in line with REF 2029 assessment criteria so that the University of Cumbria submission accurately reflects the quality, breadth and diversity of our research.

REF2029 is significantly different to previous REF exercises in that it breaks the link between individuals and the REF submission. This means that:

- Outputs are submitted at unit level, rather than being tied to named individuals.
- Institutions decide which outputs to submit, regardless of who produced them.
- In practice, this means that:
- Colleagues are not guaranteed to have their work submitted, even if they are deemed to be research active.
- Equally, colleagues are not under formal pressure to produce a fixed quota of outputs purely for the purposes of REF.

These changes fit well with the values of the University of Cumbria since we want to recognise all of the different ways people contribute to research, through mentoring, teamwork, impact and engagement, even when those contributions don't lead to a REF-eligible output. The changes also support our commitment to assessing research responsibly and focusing on the quality of work rather than the amount produced.

As the focus of REF has shifted from individuals to outputs and evidence at unit level, this Code of Practice and our associated Equality Impact Assessments focus primarily on the processes we have developed, rather than on individuals. However, we recognise that discussions over roles, responsibilities and which outputs are selected, will still have an impact on careers of individuals and we have built our processes and communication methods in consultation with staff and with appropriate appeals mechanisms to embed inclusivity regardless of protected characteristics.

1.2. Process for embedding the principles of robustness, transparency, fairness and inclusion into our REF2029 Code of Practice

1.2.1 Robustness through testing out our processes with the community

In developing our policies and processes, we have been careful to ensure that considerations of research quality are addressed through transparent, criteria-led mechanisms grounded in REF guidance, rather than through informal or unstructured decision-making. The following groups were involved in drawing up policies and processes for the CoP, including advising on SRR (Significant Responsibility for Research) status, and thereby the contracts which will contribute to the volume measure:

- **REF 2029 Code of Practice Working Group**: A group established in June 2025 which was later expanded through an open call to all staff in October 2025 with responsibility to advise on the CoP ahead of submission.
- **SRR Definition Task and Finish group**: A short life working group established in November 2024 with both academic and professional service members with previous REF experience to advise on and test out the Significant Responsibility for Research (SRR) definition.
- **The REF steering group**: An advisory committee, which includes REF Unit of Assessment (UoA) leads as well as colleagues from R&KE office and People and Culture. Terms of Reference are available internally on the StaffHub.
- **R&KE Committee:** Parent committee to the REF Steering group, which provides oversight and decision making on REF and is chaired by the PVC-Research and Knowledge Exchange.
- **Academic Board:** The Institution's principal academic authority (with final approval powers for the Code of Practice, to take place on 11th of May 2026).

A draft definition of SRR status was developed by the SRR Task and Finish group in early 2025, which was discussed by the REF Steering group in January 2025, by the University Research and Knowledge Exchange Committee (RKEC) on 28th May 2025 and by the University Academic Board on 12th June 2025.

Further consultation on the draft SRR definition was conducted with the following networks in June 2025, with networks being given opportunity to feedback via email, anonymously through the network chair, or by attending an information and Q&A session on 24 June 2025. Union representatives were also contacted as part of this consultation.

- Staff LGBTQ+ Network
- Disability & Neurodivergent Network (DANN)
- 'R'EACH ('Race' Ethnicity & Cultural Heritage) Network
- Staff Menopause Group
- Parents & Carers Network

- Health & Wellbeing Champions & Supporters

The SRR definition hinged in part on staff documenting usage of at least 75% of Research and Scholarly Activity (RASA) time within the MyHR system, with the Academic Board recommending further reflection on the robustness and inclusivity of this method, noting that, although the development of Research (RASA) plans and recording of RASA time has moved in a positive direction, it is not yet fully embedded and there may be a degree of underreporting. Detailed guidance was developed to support the recording of RASA time and updates to the University HR system were implemented to make it easier to record RASA time. A campaign was undertaken to encourage full reporting, and line managers were encouraged to discuss usage and recording of RASA time with their direct reports at annual PPDR and as part of a mid-year review.

Following additional reflection and consultation with UoA leads, the definition was refined in Spring 2026 to ensure an inclusive approach, as detailed in Section 2 of this CoP. Crucially, a self-declaration route has been added, providing opportunity for colleagues to articulate the research activities that they have undertaken but which have not been fully captured on the MyHR system.

Equality Impact Assessments (EIAs) were undertaken on key aspects of the CoP, and approved by the University Equality, Diversity, Inclusion and Wellbeing (EDIW) monitoring group in May 2026.

Final decisions on SRR status (for Research and Teaching staff) and Independent Researcher Status (for Research-only staff) will be made by an SRR sub-panel of the R&KE committee, with an appeals process as outlined in subsequent sections of this Code and in Figure 1, the overall timeline for REF preparations and processes relevant to this CoP. All decisions relating to staff eligibility and output selection will be supported by a clear audit trail, with defined data sources and validation checks to ensure consistency and robustness.

What this means for staff:

- Colleagues are expected to discuss research plans annually with line managers (i.e. their 'RASA plan') and to record research activities and book RASA time on MyHR.
- Research and Teaching Staff should consult Part 2 of this Code of Practice to establish whether they meet the criteria to be SRR.
- Research-only staff should read Part 3 of this Code to understand the criteria for determining research independence.
- Any queries can be raised with your line manager in the first instance or through contacting the RKE Directorate: research.office@cumbria.ac.uk, or following the appeals process as outlined in this Code.
- Teaching-only staff do not contribute to the volume measure.

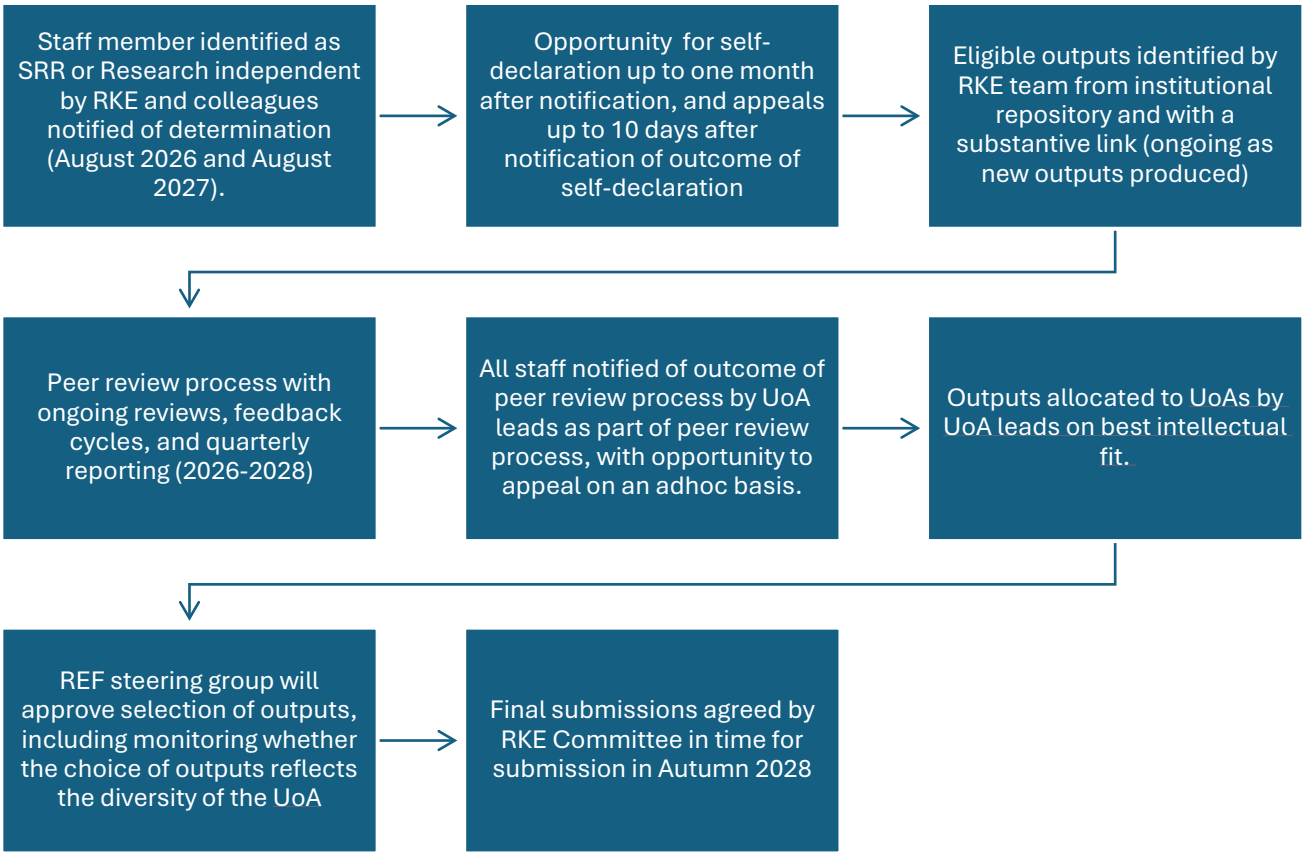


Figure 1 Timeline for application of this Code of Practice, including identification of SRR status and appeals.

1.2.2 Transparency through wide consultation

Communication and consultation on the Code of Practice and associated Equality Impact Assessments was undertaken as below:

Committee consultation:

- Presentation at the REF Steering Group on the 1st of May 2026
- Presentation at the University RKE Committee on the 6th of May 2026
- Presentation at the Academic Board for final approval on the 11th of May 2026
- The CoP & SRR was discussed at length at the REF Development Day on 2nd March 2026 (involved RKE Committee with additional participants)

All staff communication and consultation:

- A REF2029 page was created on the University intranet (StaffHub) in 2025, providing regular updates on REF. REF preparations were shared by open information sessions for staff in 2025 (14 May 2025 and 16 June 2025), led by the PVC RKE and the RKE Directorate, with recordings available on the StaffHub. Staff received notification of the webpages and events by email.

- The terms of reference of the REF Steering Group were made available on the StaffHub. Local staff will also receive regular updates through UoA leads and Institute/Faculty Research Committees or other staff meetings.
- This StaffHub highlighted in 2025 that a Code of Practice was in development and that a full staff consultation would be undertaken prior to submission. An open call for participation in the Code of Practice Working Group was sent out by email to all-staff in 2025.
- A staff news update on Responsible Research Practice in the context of REF was shared on the intranet in early March 2026.
- The PVC Research and Knowledge raised the SRR definition and REF CoP as part of a wider Academic Strategy Staff Q&A on 23rd, 25th and 31st March 2026.
- The draft Code was made available on the StaffHub in April 2026 (advertised in Global News on 1 April), with comments collected via an open access Padlet, with consultations with staff networks taking place in parallel, and an open webinar to provide further explanation and respond to queries.
- The Disability and Neurodivergent Network (DANN), the LGBTQ+ Network, the 'Race', Ethnicity and Cultural Heritage Network ('R'EACH), the Staff Menopause Group, the Health and Wellbeing Champions Group and the UCU union were consulted, and feedback was sought in April 2026

Planned communications post-approval of CoP by REF:

Our Code of Practice will be submitted to REF in May 2026 and will be published and available externally on the University website once approved (anticipated late 2026). It will be available in accessible formats through contacting the RKE team. This will be drawn to the attention of staff who are absent (e.g. parental leave, illness, fieldwork) by letter.

1.2.3 Equity, fairness and inclusion

Our institutional REF preparations are aligned to our Institutional Equality objectives 2025-29 :

- **Equality Objective 1**: Embed Equality, Diversity and Inclusion (EDI) in our decision-making, demonstrating inclusive leadership and accountability university wide.
- **Equality Objective 3:** Strive for increased equity within our workforce.
- **Equality Objective 4**: Provide an inclusive environment, where our culture of belonging recognises and supports every person to succeed as a valued member of our community

We are embedding these objectives in developing our Code of Practice through:

- Meaningful engagement with staff networks and wider staff
- Selection of CoP Working Group and REF steering group membership to support representation

- Tailored and REF specific training of the REF steering group, Code of Practice Working Group and peer review panels on diversity and inclusion and responsible research assessment (including understanding and valuing diverse outputs)
- Becoming a signatory to the San Francisco DORA and sharing a statement of commitment with staff on the responsible use of metrics in research assessment statement.
- Commitment to the Equality Impact Assessment process and inclusion of the Institutional EDI Officer as part of the REF steering group.

The University will ensure that the criteria, policies and procedures that support the REF 2029 process will be subject to equality impact assessments (EIA) to test their fairness. In developing this code, we have drawn on learning from REF 2021 EIAs (see below). An EIA has been undertaken in line with the University procedures, and in collaboration with key staff networks, with findings being used to inform this Code, as outlined in each specific section.

Equality impacts will be monitored on an ongoing basis, where differential impacts are identified, processes will be adjusted accordingly. A final EIA will be undertaken at the point of submission in 2028, including final data analysis, actions taken, and outcomes, the outcome of which will be made openly available.

Contextualisation within Institutional Policies

As set out in our Institutional Strategy (Towards 2030 - Our Strategy University of Cumbria) we value and undertake applied research that reinforces our place, people and practice roles. University of Cumbria is an institution that champions and values diverse contributions, partnerships, outputs and impacts.

Our research culture and aspirations have continued to evolve since REF 2021, aligned with our RKE Plan 2023-2030 as demonstrated out below:

- **Shifting from emerging culture to strategic development:** Our 2023–2030 RKE Plan reflects an intentional evolution from a *developing research culture* (as described in our REF2021 environment statement) toward a more cohesive and strategic research environment, embedding research and knowledge exchange activities into the heart of academic life and operations.
- **Integration with broader institutional strategy (Towards 2030):** Research and KE are now explicitly aligned with the University's overarching *Towards 2030* strategy, signalling that research isn't peripheral but central to institutional identity, our research impact, and individual careers.
- **Greater focus on capability and capacity building:** Actions are being undertaken to increase research capacity, including growth in academic staff with SRR, structured support for Doctoral training, and the development of research centres aligned to key themes.

- **Stronger emphasis on research quality:** We now have an explicit commitment to preparing for subsequent national assessment exercises (REF and KEF) as a mechanism to strengthen research performance, along with roles and support structures to enhance research quality and impact.
- **Enhanced governance and integrity training and frameworks:** The introduction and refinement of formal policies like the Code of Practice for Research, alongside our open research expectations and governance and our training and annual reporting for research integrity demonstrate a maturing research culture with clear standards, expectations and support systems.

As an institution, we received the Athena Swan Bronze Award in 2023, recognising our commitment to advancing gender equality, with actions relating to flexible and hybrid working policies, the family friendly policy and disability disclosure. The University has recently (2025) introduced the Culture, Employment and Development of Academic Researchers Survey (CEDARS) survey as a way of getting more in-depth feedback on the research culture and staff experience.

Key areas of progress include:

- We were awarded Disability Confident Leader in October 2022 and revalidated in September 2025
- We joined the Hidden Disabilities Sunflower Scheme in November 2023, extending to student in July 2024 (details at Hidden Disabilities Sunflower | MyCumbria)
- UoC is White Ribbon accredited since June 2022, reaccrediting in June 2025 (a movement which aims to end men's violence against women)
- Staff networks have been established to include:
    - LGBTQ+ founded September 2019 (our first staff network)
    - Menopause
    - 'R'EACH ('Race' Ethnicity and Cultural Heritage network)
    - A Parents and Carers network was trialled but discontinued due to inactivity.
    - The Disability and Neurodivergent Network was founded in July 2021 (Disability & Neurodivergent Network | University of Cumbria).

Update on Actions Since REF 2021

Post-REF 2021, equalities briefings were conducted with UoA leads by the Institutional EDI leads and an action plan was drawn up (owned by RKE Directorate, with oversight from REF Steering Group).

Action from REF 2021	Progress at Spring 2026
Representation of Research and Knowledge Exchange Directorate as part of EDI Steering Group	Head of Research and Knowledge Exchange (RKE) Directorate is member of Equality, Diversity, Inclusion and Wellbeing (EDIW) Monitoring Group.

EDI Officer to revise EIA template, guidance and training to reflect learning from REF	EDIW Monitoring group established March 2022. EIA process has undergone a second review process and the EIA process for the CoP is in progress.
Development and promotion of Institution-wide EDI initiatives, including enhanced data collection	Longitudinal data analysis was undertaken by People and Culture team. CEDARS data will be used for development of future initiatives.
Institutional submission to Athena Swan Charter mark.	Athena Swan Bronze (institutional) Award achieved in April 2023.
RKE team representation on the staff LGBTQ+ network	RKE team are now represented on the network.
Achieving Disability Confident to Leader Level	UoC achieved Disability Confident Leader level in October 2022
REF EIA data monitoring submissions in respect of race.	The PVC RKE is co-lead for the Race Equity Action Plan. 'R'EACH is an informal staff network that is live within UoC. The EDI Officer is deputy chair of the Anchor Anti-Racism Group for local impact.
Positive action statements in job advertisements to address low Black, Asian and Minority Ethnic representation in UoAs	Positive action statements are included in all job advertisements, explicitly addressing race, to tackle the underrepresentation of Black, Asian and Minority Ethnic staff within Units of Assessment (UoAs).
Proportionately high number of staff and outputs attributed to older staff	Range of ECR training has been implemented to improve the capability of ECRs, alongside preferential access for ECRs to internal research support funds.
EDI specific training to be delivered by UoC's Centre for Academic Practice Enhancement	Two EDI training sessions have been held annually for the last four years as well as mandated e-training for all staff.
Continue to provide EDI data in Graduate School reporting, escalated to relevant committees (including Academic Board and Academic Governance Committee)	Annual updates on PGR data provided to relevant committees included EDI data.

Updates to our EIA action plan since REF 2021 will be reported as part of the REF SPRE narratives.

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

2.1 Policies and Procedures

This section outlines our policies and procedures for identifying Significant Responsibility for Research (SRR) for 'teaching and research' (ACEMPFUN 3) contracts.

REF2029 provides guidance on what constitutes SRR status:

"*Contracts with significant responsibility for research are those for whom explicit time and resources are made available to engage actively in independent research, and that it is an expectation of the job role.*"

Therefore, the SRR criteria that we have developed are based upon job-role expectations, not past performance.

As an institution, we believe that the first element of this definition ('*explicit time and resources are made available')* is where the University is best able to evidence a transparent, objective and inclusive dataset that differentiates SRR from non-SRR academic staff. Whilst we are working towards a consistent and auditable system for workload allocation across the Institution, we are not yet in a place to use this as a rigorous means of defining SRR status. And, although we have made strong progress in promoting and embedding the recording of the RASA time on our HR system, we appreciate that there may still be some barriers to its usage. Therefore, to ensure inclusivity of this process and to acknowledge our institutional context and the limitations of quantitative data in role description, we have also added a route for self-declaration as outlined below.

We have provided a set of UoC indicators for each of these elements to support identification of SRR status (Table 1). Staff must meet criteria for each of these Elements but are not required to meet every indicator. i.e. A staff member is designated as SRR where the staff member satisfies at least one indicator for Element 1 (or self-declaration) AND at least one indicator for Element 2 AND Element 3.
Self-declaration (see Section 2.1.1.) may substitute only for Element 1; the staff member must still satisfy Elements 2 and 3. These indicators have been designed to ensure that identification of SRR is based on clear, role-related expectations and verifiable evidence, while also supporting a consistent and credible representation of our research activity.

Table 1 UoC indicators to support identification of SRR status

Element of SRR definition for inclusion in volume metric Every element must be met	**University of Cumbria indicators** At least one indicator must be met for each element	**Rationale**
Element 1: **Explicit time and resources are made available**	1.1 ≥75% of an individual's annual Research and Scholarly Activity (RASA) entitlement is assigned to REF-relevant research (and designated REF-relevant knowledge exchange) activity and is requested via MyHR, within the relevant HESA census window.	Although all academic staff are entitled to 185 hr research time pro-rata, line manager approval should be sought via MyHR system. The 75% figure seeks to capture individuals making a significant contribution to research, whilst allowing for individuals to still use a small portion of their RASA time for other (non-REF eligible) activities such as scholarship, CPD etc. This approach offers an objective mechanism to differentiate between research active staff and those that undertake more KE and wider scholarly activities in the university, particularly at Grade 7 (Lecturer) Grade 8 (Senior Lecturer) levels and for Grade 9 (Principal Lecturer).
	1.2 Where the job role includes a formal research component (e.g., Associate Professor/Professor on the research pathway).	This identifies conferred staff at Associate Professor and Professor who are members of the professoriate on the basis of the research career pathway and who have a specific allocation of research time within their annual workload (Associate Professor 350 hours per year, Professor 550 hours per year) based on the Academic Workload Model handbook. This research allowance and associated RASA allocation has not been applied to Associate Professors / Professors who have been conferred on the basis of *Teaching & Learning*, *Academic Leadership, Professor of Practice* or *Enterprise/Professional,* so only those following a research pathway will meet this indicator.

	1.3 Specific investigator time on Academic Work Load Model (AWLM)via acting as a named PI or Co-I on externally funded research projects at UoC, with ≥10% workload allocation across the project and accumulated for ≥2 years since 1 Jan 2021.	This identifies staff across all grades, job role descriptors and career pathways who can evidence significant workload allocation to externally funded projects which typically include provision for investigator time (e.g. UK Research and Innovation (UKRI)-funded projects). This indicator only relates to funded investigator time whilst the individual has been employed at the University of Cumbria. This indicator has to be flexible to reflect that within a single HESA census window projects may start or end, hence the threshold of 10% of workload allocation within the term of the funded project as being a minimum threshold of significant research responsibility. This indicator for SRR status is based on a timescale of the entire REF cycle (i.e. since 1st January 2021) to acknowledge the variability in funded investigator time experienced by an individual, due to either funding bid success or individual career stage and changes in circumstances across the research cycle. To meet this indicator, an individual will need to demonstrate ≥10% workload allocation for a cumulative period of a minimum of 2 years within the current REF research cycle, starting 1st January 2021.
Element 2: **Engages actively in independent research**	2.1 Eligible to apply for external research funding (e.g., UKRI) as lead/co-applicant	This UKRI criteria for standard funding applications are: • Employed at an eligible institution (i.e. the University) • Contract of employment extends beyond the duration of the award; • Contract of employment stipulates research as a typical activity. In practice, almost all academic staff employed on a teaching and research contract at the University are eligible within this indicator. There is a small

		number of academic staff employed on fixed-term contracts (~40) for whom this indicator will be important in meeting REF eligibility.
	2.2 Eligible to apply for research sabbatical under the UoC Sabbatical Scheme.	This indicator is based on eligibility for application to the *University Sabbatical Scheme* administered by People & Culture: • Continuous employment at the University of 3 years or more • Applicants must hold a permanent contract. • Successful applicants cannot apply for further sabbatical leave for a further 3 years following the end of a period of sabbatical leave. • Completion of all relevant mandatory training courses In practice, all academic staff on permanent contracts meet this indicator. This indicator does exclude staff employed on fixed term contracts; however, depending upon the duration of their employment, such staff may meet **Indicator 2.1** above within a specific HESA census window.
Element 3: **Research is an expectation of the job role**	3.1 Expectation of research as indicated by contract of employment terms (teaching and research)	This indicator will include all academic staff on permanent or non-hourly paid contracts where the default position of the University has been to define the job role as Teaching and Research..

* RASA: A system for recording Research and Scholarly Activity, with clear *guidelines and categories for research-related activities*.

2.1.1 Process for identification of SRR

The RKE Directorate will identify staff who meet the criteria set out in our Code for SRR from the RASA utilisation data in our HR System and through discussion with UoA leads, with review by the SRR panel (a sub-group of the REF steering group) and the final decision being made by RKE committee.

After the HESA Staff return data for 25/26 is collated in Autumn 2026, the RKE Directorate will inform staff who have been included in the Volume Measure and provide details of the appeals process for anyone not included. However, since it is still possible to return outputs from staff who are not included in the Volume Measure, non-inclusion in the SRR should not adversely impact on individuals. We also intend to use this process as a mechanism to identify and support colleagues who are starting to build a research portfolio (or coming back to research after a period of absence) but do not yet fully meet the criteria for SRR. A research development and mentoring pathway will be agreed with their line managers, with specific objectives and time allocated within their RASA plans to enable the production of high-quality research and for the individual to be included within the SRR definition in the future. Learning from this exercise will help to embed the systems and culture which equips new researchers to build their research independence, skills and networks. Our approach ensures that SRR identification remains fair and compliant, whilst also allowing us to recognise and support the development of research capacity across our academic community.

2.1.2 Self-Declaration Route for Element 1

The self-declaration route exists to ensure that staff whose research responsibilities are not fully or accurately reflected in existing institutional records have a fair and transparent opportunity to be considered. This process is not the institution's primary SRR identification mechanism. Self-declaration will be considered alongside verifiable evidence and will not be used as the sole basis for determining significant responsibility for research. Staff whose research activity is accurately recorded through the Research Activity and Staff Allocation (RASA) mechanism do not need to use this route.

A staff member may meet Element 1 via self-declaration of SRR, subject to verification by the UoC SRR Panel (a sub-group of the REF steering group) and the right of appeal. Self-declaration cannot substitute Elements 2 and 3. The process for self-declaration provides opportunity for staff who have not fully recorded their research activities using the MyHR RASA mechanism to provide an evidence based submission demonstrating that undertaking research is an explicit objective in their role (i.e. specified objectives relating to research activity within their Performance and Development Review (PPDR) and RASA plans, providing excerpts or screenshots of these documents agreed with their line manager).

Submissions should be made to the RKE Directorate within one month of colleagues being notified who is being included as SRR within the volume measure (Autumn 2026) and will be considered on a case-by-case basis.

The panel will assign one of three outcomes to each self-declaration:

Table 2 Outcomes of Self-Declaration

Outcome	Description
SRR Confirmed	The evidence provided through the self declaration process establishes that the role meets the requirement for Element 1, as set out in Table 1 above. The staff member will be identified as SRR for REF 2029 purposes and institutional records will be updated accordingly.
Development Pathway	The evidence does not currently meet the threshold for SRR, but the staff member has potential to become more research active and there is a basis for a supported development pathway. The RKE office will contact the staff member to discuss a tailored development plan. This outcome does not preclude future SRR identification in subsequent cycles.
Not Eligible	The evidence does not establish that the role carries research responsibility as a defined expectation. Written reasons will be provided. The staff member may appeal this decision within the specified timescales (Figure 1) and membership of the appeals panel will be different to that of the SRR panel.

2.2 Staff, Committees, and Training

Decision making committees are as set out in the introduction of this CoP, with remits and memberships being available on the StaffHub.

Training will be provided to the REF steering group and others involved in decision making, including:

- **Mandatory e-learning modules**
    - **Unconscious bias** - This module explains how to overcome unconscious bias to improve decision making and professional relationships, and to create more open, inclusive and effective organisations.
    - **Diversity in the Workplace** (for professional services staff) and Diversity in Learning and Teaching (for Academic staff)**:** Introducing the concepts of diversity, equality and equal opportunities, this training covers all aspects of The Equality Act 2010. Stereotyping, prejudice, bullying and harassment and legal liability are explored in addition to challenging unacceptable behaviour.

- **REF-specific training**

  This training will be live, with expert input, discussion and Q&A, delivered by the UoC's Equality, Diversity and Inclusion Officer and other experts on research culture and responsible research assessment, including:

  - The Equality Act 2010, Public Sector Equality Duties and protected characteristics in the context of REF2029
  - The University of Cumbria's Equality objectives and how these will be upheld throughout the REF 2029 process
  - Learning from the EIAs from REF 2021
  - Our approach to EIAs for REF2029
  - REF SRR and research independence criteria
  - Responsible research assessment practices in the reviewing of outputs

2.3 Equality

2.3.1 Appeals

All staff have an opportunity to appeal their identification as SRR (for T&R staff) or independent researchers (for R-only), within a set time period (see Figure 1 for timeline) of being notified of whether they have been failed to meet SRR status. Colleagues will be informed of this by UoA leads and by updated information on the StaffHub and an all-staff email after the Code of Practice is approved and published. The appeal panel will comprise of at least three members and will be independent to the SRR sub-group (original decision makers) and appointed by the PVC Research and Knowledge Exchange, on behalf of the REF steering group, ensuring no conflicts of interest. Members will have appropriate training.

Colleagues wishing to appeal can contact: REF2029appeals@cumbria.ac.uk and will be informed of the outcome within four weeks, with the REF Steering Group also being informed.

Ad-hoc cases will be considered at later dates in the case of any staff on long-term leave (parental leave, sick leave) during the dedicated window as shown in Figure 1.

2.3.2 Equality Impact Assessment (EIA)

Based on the Equality Impact Assessment (Appendix 1), equality considerations directly informed the identification of staff with Significant Responsibility for Research (SRR) and the processes related to it. Quantitative analysis of HESA staff data disaggregated by protected characteristics (including age, sex, disability, ethnicity, contract type and FTE) was used to assess differential impact between staff holding SRR status and the wider REF-eligible population. This identified potential risks of indirect disadvantage for early-career staff, those on fixed-term contracts, and colleagues absent due to maternity, disability or caring responsibilities. In response, specific actions were taken, including removal of the three-year

contract duration criterion and the introduction of a self-declaration route to capture research activity not fully reflected in our Human Resources (HR) systems. These mitigations, alongside clear statements that outputs remain eligible irrespective of SRR status and mandatory REF-specific EDI and unconscious bias training for decision-makers, ensured that the final SRR definition and associated procedures were transparent, inclusive and aligned with the Public Sector Equality Duty.

Part 3: Determining Research Independence

This section is relevant to Research-only staff, to differentiate independent researchers from those employed to deliver research. Colleagues on Teaching and Research contracts should consult the SRR definition as outlined in Part 2 of this CoP.

3.1 Policies and Procedures

The decision of whether someone is deemed to be an independent researcher will be made according to the definition and criteria set out below, irrespective of job title or salary.

We recognise that this is particularly important for Research-only contracts and that the small number of people employed in such roles at UoC means that RKE staff leading on the identification of independent researchers will work closely with UoA leads to inform a decision, with consultation with individual staff members if required. Recommendations of who to classify as Research Independent will be reviewed by the REF steering group before final approval by the RKE committee.

Definition of independent researchers

This section of the CoP applies to staff on research-only contracts. We anticipate that this definition applies to fewer than 10 staff and therefore commit to consultation directly with those staff, via UoA leads, to ensure accurate data and allocation.

For research-only staff to be defined as research independent, they must demonstrate that they are undertaking self-directed research, rather than carrying out another individual's research programme.

Indicators of research independence include:

1. Leading or acting as principal investigator or equivalent on an externally funded research project.
2. Holding an independently won, competitively awarded fellowship where research independence is a requirement.
3. Leading a research group or a substantial or specialised work package.

In accordance with the REF guidance, UoC does not recognise Research Assistants or Research Associates as independent researchers where the primary employment function is research only and they are employed to carry out another individual's research programme rather than pursuing independent research.

The RKE Directorate will identify if the individual in question meets the indicators listed in Table 3 utilising available, and auditable, data. If fulfilling ***any one*** of these indicators, that individual will be deemed to have research independence and will be included within the REF 2029 volume measure. These criteria will

be used to determine the research independence of Research Assistants, Research Fellows, and Senior Research Fellows and these staff will be consulted with directly by UoA leads during 2026.
The RKE Directorate will obtain data from the HR Directorate on all staff holding *research-only* contracts. In consultation with Unit of Assessment (UoA) Leads, the Directorate will then identify those staff who meet the relevant criteria. These recommendations will be reviewed by the REF Steering Group, with final decisions approved by the RKE Committee.

Table 3 Indicators for Research Independence

Research independence indicator	Audit details
1. Leading or acting as principal investigator or equivalent on an externally funded research project.	Data from Finance and RKE Directorate records.
2. Holding an independently won, competitively awarded fellowship where research independence is a requirement.	Data from RKE Directorate records.
3. Leading a research group or a substantial or specialised work package.	Academics who have been identified as chairing a steering group or as an academic lead within a research centre or group. For current research centres and groups see: cumbria.ac.uk/research/centres-and-groups/

3.2 Staff, Committees, and Training

As per Part 2 of the guidance.

3.3 Appeals

The appeals process will be the same as outlined in Part 2 of this CoP, relating to SRR status.

Staff can flag inaccuracies in the data that is returned to the HESA Staff record during the initial consultation via UoA leads or within the appeals window (see Figure 1 for timeline).

3.4 Equality Impact Assessment (EIA)

The criteria and process for determining research independence were reviewed and consulted on as part of the Equality Impact Assessment of the Code of Practice. It is anticipated that this definition will apply to fewer than ten members of staff in the University; accordingly, there is a commitment to engage directly with those individuals, via Unit of Assessment leads, to ensure that the indicators of research independence are met and that they are able to demonstrate that they are undertaking self-directed research rather than carrying out another individual's research programme. The EIA concluded that the process does not result in any positive or negative impact on staff.

Part 4: Allocating Contracts to UoAs

4.1 Policies and Procedures

Based on the internal and external peer review of outputs, recommendations will be made for allocation by UoA leads on a basis of best intellectual fit, with final approval by REF steering group. During the peer review process, the reviewers are asked to comment on the 'fit to the UoA' based on the UoA descriptor and boundaries. This might be guided by typical outputs, publication venues or audiences, funders, research groups or centre affiliation, doctoral supervision or leadership / citizenship activities, as well as by the researcher's own views on this. Decision making processes, committees and training are as described in previous sections of this CoP. The allocation of outputs and staff to Units of Assessment is undertaken to ensure the most appropriate academic and intellectual alignment with REF UoA descriptors, supporting a coherent and credible submission that reflects the strengths of the research undertaken.

4.2 Equality Impact Assessment (EIA)

The process for allocating contracts to UoAs were reviewed and consulted on as part of the Equality Impact Assessment of the Code of Practice. Decisions will be made at UoA level, in consultation with individuals. As we are submitting to only a small number (likely to be less than five) of units, decision making will be practical and consultative, with no difference in perceived value or career benefit for contracts being associated with one unit rather than another. No potential equality issues were identified as part of the EIA.

Part 5: Selecting outputs

All outputs submitted to REF 2029 will meet the REF definition of research and eligibility requirements. Outputs will be selected solely based on their quality, defined in terms of originality, significance and rigour. The UoC approach to output selection is governed through its REF committee structure, ensuring that all decisions are:

- Fair, transparent and consistently applied
- Grounded in structured academic judgement
- Subject to independent scrutiny and moderation
- Aligned with Equality, Diversity and Inclusion (EDI) principles

The process is designed to ensure that the final submission provides a robust, evidence-based and credible representation of research quality, in accordance with REF 2029 guidance.

Submissions to REF2029 must include a set number of research outputs, per UOA, equal to 2.5 times the HESA volume measure. The volume measure in REF 2029 ensures that the scale of an institution's submission aligns with its research capacity. It will be used to determine the number of outputs and impact case studies required for each Unit of Assessment (UoA) submission, ensuring proportionality. The volume measure will be calculated using the percentage of a full-time equivalent year of contracts that have significant responsibility for research (SRR) and research independence (RI). For example, a UoA with a volume measure of 10 would need to submit 25 (10x2.5) outputs.

Outputs must meet the REF definition of research and will be selected only based on their quality. No account of any personal characteristics including age, disability, gender reassignment, marriage or civil partnership, pregnancy or maternity (including breastfeeding and paternity or adoption leave), race, religion and belief including non-belief, sex or sexual orientation. Our approach to output selection is designed to ensure that the final submission provides a fair, balanced and evidence-based representation of the research conducted within each Unit of Assessment. This is achieved through structured peer review, moderation processes and institutional oversight, rather than through individual-level selection.

All published research and scholarly outputs must be deposited in the institutional open access repository, PURE and meet the REF open access criteria.

An internal peer review team, including the UoA leads, will select outputs for the REF according to the above criteria. UoC will identify the eligible employment relationship between an individual author (or equivalent) and the Institution through the inclusion of a HESA Staff Identifier for each output submitted.

The expectation from REF2029 is that a maximum of five outputs will be associated with a single substantive link within a submission at UoA level. This is intended to support HEIs and to ensure that submissions are representative of the full range of research within the submitting unit and are not unfairly disproportionate. Where individuals have a large number of outputs UoA leads will work with them to

identify those of highest quality. If this maximum is exceeded in a submission, the submitting unit will explain the rationale for this within the statement of representation (as part of the SPRE narrative).

5.1 Process for peer review of outputs

Peer review panels have been established within each Institute to assess the quality of research outputs in preparation for REF 2029, ensuring a consistent, transparent and criteria-led approach across the institution. Panels, chaired by a senior academic and comprising between four and twelve experienced researchers, were appointed through a process that emphasised disciplinary expertise, diversity and impartiality, with administrative support being provided by the RKE Directorate. Eligible outputs for peer review are identified through PURE (the Institutional repository), with each output being independently reviewed by two panel members under a single-blind process, assessed against REF-aligned criteria of originality, significance and rigour, and assigned a provisional starred rating. Reviewers will provide detailed, constructive feedback to support the enhancement of future outputs. Final scoring and moderation will be determined by the panel Chair, with particular attention given to outputs at the 4* level and grade boundaries, based on the combined feedback provided by reviewers.

Rigour and fairness will be further strengthened through regular calibration and validation.

Panel members received structured training and guidance, including input from former REF panel members, to support consistent interpretation of quality thresholds and the provision of robust feedback.

A representative sample of outputs will be periodically subjected to external independent review by experienced REF panel members to validate internal scoring. Quarterly reporting will enable institutional oversight and continuous improvement. The purpose of the peer review process is to ensure that outputs are assessed consistently against REF criteria, enabling the University to identify work of the highest quality while maintaining fairness, transparency and accountability in all decision-making.

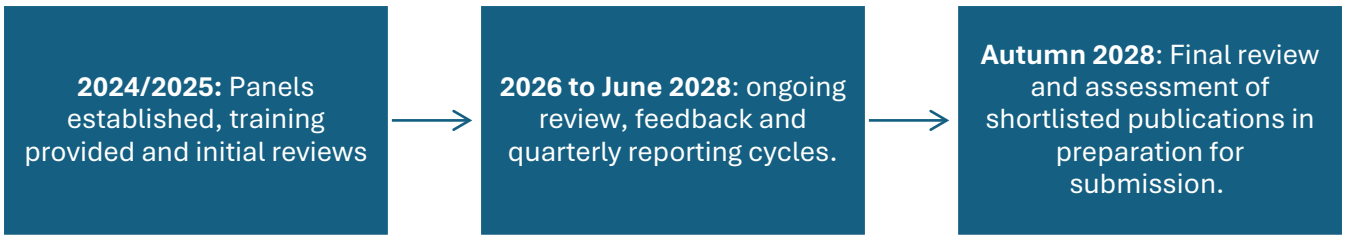


Figure 2 Timeline for output peer review process

5.2 Policies and Procedures

5.2.1 Identifying substantive link to outputs

For REF 2029, outputs are not tied to specific researchers and can be submitted by the institution if a **substantive link** can be evidenced. A substantive link in the context of REF 2029 refers to an eligible employment relationship between an individual author (or equivalent) and the Institution submitting the output.

The RKE team will identify the eligible employment relationship between an individual author and the University through the inclusion of a HESA Staff Identifier for each output submitted.

Eligible employment relationships are defined as:

- a minimum of 0.2 FTE for at least 12 months continuous employment (as defined by Section 210 of the Employment Rights Act 1996 (ERA 1996) or the Employment Rights (Northern Ireland) Order 1996) by the HEI making the submission. Continuous employment may be demonstrated by a sequence of consecutive contracts **and**
- the role descriptor includes an explicit expectation of research activity (in line with the REF definition of research) within the role. 'Research activity' is not restricted by profession and an eligible employment relationship may be with any staff member who undertakes, enables or supports research

An eligible employment relationship must have occurred, either:

- **At the point at which the submitted output was first made publicly available**,

  An output may first be made publicly available at any point during the eligible employment relationship

  OR

- **Before the submitted output was first made publicly available**, when the research resulting in the output was carried out.

  For most outputs this time-limited period will have occurred between January 2021 to December 2028

  This time-limited period may be extended prior to January 2021 providing that the output was published during the REF publication period.

The time-limited period prior to the date of the output first being made publicly available, during which research resulting in the output was carried out as:

- two years for the majority of outputs
- five years for long-form and extended process outputs

Eligible employment relationships that occur after the point at which an output was first made publicly available cannot constitute a substantive link.

Outputs sole-authored by, or where the **only** substantive link to the institutions is through the following groups, will not be eligible for submission:

- postgraduate research students (including PhD theses)
- visiting or honorary staff
- staff on teaching only contracts (that is, those returned to the HESA Staff record as ACEMPFUN.01)
- individuals employed on academic or other contracts with no explicit expectation of research within the job role, technical teaching or support only contract

Note that where a member of staff is also undertaking a Postgraduate Research Degree, it may be possible for them to act as a substantive link if they meet the criteria for both an eligible employment relationship AND SRR or Research Independence.

5.2.2 Long form outputs

REF2029 recognises all types of research and forms of output. To mitigate any unintended consequence that research methods or output formats that typically take longer to produce are disinvested in by institutions, the funding bodies consider that it is appropriate there is an exception in place in REF 2029 to the requirement for an eligible employment relationship to have occurred either during or before the point at which an output has been made first publicly available.

This exception will apply to long-form and/or extended process outputs only and will allow the submission of these output types in REF 2029 where an eligible employment relationship occurs after the point that the output is first made publicly available, for a time-limited period.

Where a researcher is employed on a contract that constitutes an eligible employment relationship at an institution at the point a REF submission is made, **long-form and/or extended process outputs** published before this contract commenced will be eligible for submission if:

- they were first made publicly available during the REF period (January 2021 to December 2028) **and**
- the staff member's eligible employment relationship with the submitting institution commenced within 5 years of the output first being made publicly available

The researcher does not need to have had an eligible employment relationship with another institution at the point the output was first made publicly available.

Outputs submitted using this exception will be flagged and a 100-word justification of long-form/extended process designation will be required and assessed by panels.

Long-form outputs are defined as outputs of extended scale or scope.

Extended process outputs are the culmination of a substantial, discrete research endeavour which, due to the nature of the approach or methodology, involved intense activity, sustained over a period of time, usually of five years or longer.

5.2.3 Selecting outputs where the substantive link is via former staff, including compulsory redundancy, voluntary redundancy / severance, retirement and expiry of fixed term contracts

In accordance with REF 2029 guidance, outputs authored by staff who were made compulsorily redundant before the date on which the output became publicly available will not be eligible for submission. These outputs will be identified through the process set out in Section 5.2.1 above.

Where an output includes an internal co-author through whom the University can demonstrate an eligible substantive link, the output may be considered for submission on the basis of that substantive link.

Where staff have left the University through resignation, voluntary redundancy/severance, or retirement, outputs will be considered for submission in line with the University's standard processes for determining Significant Responsibility for Research (SRR), research independence, and substantive links.

Outputs produced by staff whose fixed-term contracts expired during the REF assessment period will be considered in the same way, ensuring compliance with the Fixed-term Employees (Prevention of Less Favourable Treatment) Regulations 2002.

5.2.4 Assigning outputs to UoAs:

Outputs will be assigned to UoAs based on disciplinary fit with the REF UoA descriptors, with internal peer review across multiple UoAs as appropriate, reflecting where work is truly interdisciplinary and collaborative across the institution. Potential for assessment by another UoA will be flagged as part of our quarterly reporting on the peer review cycle.

5.2.5 Procedures for supporting diversity of outputs

Our research at Cumbria involves a diverse set of research practices, which lead to a wide range of diverse outputs, shared in the best format for the research itself and its audiences. Such outputs may include innovative formats, accessible reporting formats, and modes of expression that may depart from historical conventions within specific fields and contexts.

Examples of diverse output types include, but go well beyond, journal articles, conference papers, monographs and book chapters, to include, as appropriate to each UoA:

- non-textual (artefacts, audio, visual, multi-modal)
- creative, performance and practice-led outputs
- Public exhibitions
- reviews and research synthesis
- software and code
- datasets

- translations and critical editions
- multi-component outputs
- policy summaries and analyses
- different types of reports

An underpinning principle of the REF is that all forms of research output and research practice will be assessed on a fair and equal basis.

UoA leads will ensure wide staff consultation via Institute/ Faculty research committees on the types of outputs expected to ensure that these are supported and that the outputs being put forward for internal review recognise excellence across different output types, formats and disciplinary norms.

UoC will provide appropriate training and guidance to those undertaking review of potential outputs to ensure a diverse range of outputs are fairly considered. Peer review panels are expected to reflect on submissions, to identify and address potential biases. Where UoAs are likely to have diverse outputs, we have ensured that panels have experience with producing or reviewing such outputs.

Our internal review teams will keep abreast of latest guidance from REF2029 on definitions of research quality, to ensure that the assessment of diverse outputs will recognise rigorous, significant and original research across multiple purposes, designs, methodologies, analytical approaches and modes of communication.

UoA leads will regularly review the spread of output types and authorship to ensure no groups, career stages, or forms of scholarship are systematically disadvantaged, and will take corrective action where needed. For UoA 32, we are putting in place a diverse UoA leadership team to ensure a breadth of expertise.

5.2.6 Procedures for ensuring submissions are representative of the research undertaken within the submitting unit during the REF period:

UoA leads will ensure submissions are representative of the research undertaken within the submitting unit through consultation at local level in Institute / Faculty research committees.

Each Unit (UoA) will provide an overview of research activity and the academic framing of the submitting unit, including any discrete subject structures, research groups and/or areas of specialised academic endeavour (which will also be used in the UoAs' SPRE narrative).

Where the submitted outputs and associated reserve list do not fully demonstrate the diversity of the research activity undertaken within the Unit, this will be explained in the statement of representation. However, due to our inclusive approach to REF2029, we anticipate that a large proportion of our high quality outputs will be submitted. If selecting between two outputs which were scored equally by our peer review panel, UoA representativeness will be taken into account.

Should any staff members have a concern that one area of research might be significantly underrepresented they can raise this directly with UoA leads or with the RKE Directorate. In doing so, the University seeks to ensure that submissions are both representative and robust, accurately reflecting the diversity, strengths and distinctive characteristics of research within each Unit of Assessment.

5.2.7 Policies and procedures and responsible research assessment practice

As part of its commitment to responsible use of metrics in the research assessment, the University is a signatory to DoRA, the San Francisco Declaration on Research Assessment. All staff have access to the Responsible Research Assessment webpages and were provided with an update on responsible research assessment practices in the context of REF2029 via an internal news bulletin in March 2026.

As part of the training for the peer review panels, we have emphasised the importance of not using citations and journal impact factors in deciding the quality of the output

Our guidance to UoAs aligns with DoRA. In particular, this means that decision makers will:

- Minimise reliance on quantitative metrics (and reflect on the context and limitation of any that might be used).
- Use discipline-appropriate established quantitative and qualitative information across the full range of research activity to support the evaluation of outputs.
- Avoid using a single quantitative metric to decide whether an output is included.

5.2.8 Outputs in other languages

Outputs in languages other than English, including British Sign Language (BSL) and Welsh, will not be treated less favourably in the output assessment or selection process and will be assessed solely on the basis of their quality and relevance. The University's peer review and selection processes will be applied equitably to all outputs. Internal or external peer reviewers with appropriate linguistic expertise will be selected to assess these outputs. Relevant training, including unconscious bias training where appropriate, will be provided to support fair and equitable assessment.

5.3 Staff, Committees, and Training

As set out in previous sections.

5.4 Equality Impact Assessment (EIA)

The Equality Impact Assessment informed the design and scrutiny of the University's output selection policies and procedures by examining how eligible outputs are identified, how substantive links are established, how outputs are allocated to Units of Assessment, and how the overall representativeness of

submissions is ensured. Consistent with REF 2029 requirements, as the outputs are fully decoupled from individual staff the EIA found no evidence of differential impact arising from the structure of the selection process. Eligible outputs are drawn from PURE, the institutional repository, and subjected to a structured peer-review process in which each output is independently assessed by two reviewers using REF-aligned criteria of originality, significance and rigour. To support equitable decision-making, reviewers receive guidance and training, panels are constituted to reflect appropriate disciplinary breadth (including experience of diverse output types), and panels are expected to reflect actively on potential bias when forming submissions. Mandatory unconscious bias and REF-specific EDI training for all colleagues involved in REF-related decisions further mitigates the risk of discrimination at key selection stages, ensuring that outputs are considered fairly and transparently.

Appendix one: Equality Impact Assessment

Title of EIA:	**Code of Practice for REF 2029**
Lead colleague:	Anish Kurien, Head of Research and Knowledge Exchange

Step 1: Screening for equality relevance. Screening should take an overview of the change and the equality relevance on which to base your considerations.

If **no equality-related impact** is identified (e.g. no impact on any aspect of equality relevance; change is steeped in statutory guidance that has little/no impact on any protected group), then you do not need to complete this form. In this case, please acknowledge your decision on your related committee paper.

If you have identified **equality-related impact** (e.g. the change will affect different protected groups within our community; impacts functions and/or how the organisation will operate in terms of equality; physical/digital change that could indirectly impact members of a protected group) then please complete this form and send a final version to the EDIW Monitoring Group via EIASubmissions@cumbria.ac.uk for review. The EDIW Monitoring Group will either approve the EIA, or refer with guidance to address before resubmitting

Step 2: Identify the proposed change e.g. strategy development; projects and plans; initiatives, policy and procedure creation or amendment; restructure. Please state if this is a new development or a review, outlining any statutory requirements.

The change is the Development of a Code of Practice for REF 2029. The Code sets out the principles, processes, and governance arrangements that underpin how we identify and select research outputs. This includes a definition of colleagues who will contribute to our REF volume measure through being designated as having Significant Responsibility for Research (SRR).

The previous REF exercise (REF 2021) also required an SRR definition. However, REF 2029 is significantly different in that individuals are no longer being submitted to REF and the outputs being submitted are decoupled from individuals. Therefore, this EIA process focuses mainly on the processes and definitions, rather than individual circumstances.

Whilst there is always potential for bias, assumptions and unintended consequences, the overall aspiration is that this Code of Practice will actively enhance inclusion, and the discussions surrounding REF will contribute in a positive sense to our emerging research culture, through clearer RASA plans, time allocation and reporting on REF-related research activity. Decoupling is intended to move away from assumptions about a normative 'productive' academic career, allowing scope for productivity and output production to be different across the population. However, we

recognise that there is still a risk that processes might be built in a way which reinforces bias and assumptions about types of contributions made to research and what constitutes research excellence.

Although this EIA focuses on the Code of Practice, it should be noted that this is being developed within the wider context of REF 2029, which has an increased emphasis on the research culture, environment and inclusion, providing opportunity for reflection, enhancement and sharing of practice through SPRE narratives.

Whilst the Code of Practice is a policy requirement from Research England, it is viewed (by RE) as a 'living' document and therefore there is potential for this to be revisited should new information emerge on disadvantage to a particular group.

Step 3: Please reference sources of data/information, consultation, or individuals/groups you have identified to explore equalities impact (e.g. links to relevant legislation, good practice guides, sector guidance/practice, staff networks, UCU, Unison, UCSU and student networks, local equality groups, data, internal colleagues, external critical friends, Equality Act 2010 and EHRC considerations)

Sources of data

The REF Code of Practice is underpinned by the following guidelines from Research England

- REF 2029 guidance on EIAs (as well as previous REF EIA / Code of Practice) Equality Impact Assessment (EIA) Guidance – REF 2029
- Section 8 – Code of Practice guidance – REF 2029
- Section 3 – Volume Measure guidance – REF 2029
- Section 4 – Contributions to Knowledge and Understanding (CKU) guidance – REF 2029

Responsible research assessment resources:

- CoARA presentation on demonstrating responsible research assessment in REF 2029 Codes of Practice
- KCL resource (and accompanying journal articles) on addressing bias in research assessment (reading group handbook) kcl-pure.kcl.ac.uk/ws/portalfiles/portal/337935047/KLA_Addressing_Bias_in_REF_2029.pdf
- Declaration of Research Assessment (DoRA)

Committee consultation:

- The CoP & SRR was discussed at length at the REF Development Day on 2nd March 2026 (involving involved RKE Committee with additional participants)
- Joint Negotiating and Consultative Committee (JNCC) Trade Union members were contacted by the DP&C to ask them for their feedback as part of the consultation on the REF 2029 Code of Practice.
- Code of Practice will be presented at the REF Steering Group on the 1st of May 2026
- Code of Practice will be presented at the University RKE Committee on the 6th of May 2026

- Code of Practice will be presented at the Academic Board for final approval on the 11th of May 2026

All staff communication and consultation on the Code of Practice:

- A REF2029 page was created on the University intranet (StaffHub) in 2025, providing regular updates on REF. In addition to this an externally facing REF 2029 page was also developed. REF preparations were shared by open information sessions for staff in 2025 (14 May 2025 and 16 June 2025), led by the PVC RKE and the RKE Directorate, with recordings available on the StaffHub. Staff received notification of the webpages and events by email.
- The terms of reference of the REF Steering Group were made available on the StaffHub. Local staff will also receive regular updates through UoA leads and Institute Research Committees or other staff meetings.
- This StaffHub highlighted in 2025 that a Code of Practice was in development and that a full staff consultation would be undertaken prior to submission. An open call for participation in the Code of Practice Working Group was sent out by email to all-staff in 2025.
- In early March 2026, a staff news update on Responsible Research Practice in the context of the REF was shared via the intranet, alongside the development of an externally facing webpage setting out the University's commitment to responsible research practice.
- The draft Code was made available on the StaffHub between the dates of 31st March and 24th April 2026 (advertised in Global News on 1 April), with comments collected via an open access Padlet.
- Trade union colleagues were consulted directly by RKE Directorate
- Discussions were held and feedback taken from the VC Executive and the Professoriate in April 2026
- Consultations took place with the following staff networks in network meetings and providing opportunity to contribute via Teams sites and via a Padlet
    - The Disability and Neurodiversity Network (DANN)
    - LGBTQ+ staff group
    - 'R'EACH ('Race' Ethnicity & Cultural Heritage) Network
    - Staff Menopause Group
    - Health & Wellbeing Champions & Supporters

Following additional reflection and consultation with UoA leads, the SRR definition was refined in Spring 2026 to ensure an inclusive approach, as detailed in Section 2 of the CoP. Crucially, a self-declaration route has been added, providing an additional opportunity for colleagues to articulate the research activities that they have undertaken but which have not been fully captured on the MyHR system. Feedback collated through the Padlet will be incorporated into the final version of the Code of Practice. The principal amendments arising from this feedback is the removal of the use of *20% of total annual workload allocated to research* as an indicator of Significant Responsibility for Research (SRR) for Element 1. This change reflects the lack of sufficiently objective and auditable evidence to support this criterion.

Consultation on the definition of Significant Responsibility for Research

The definition used to identify staff with **Significant Responsibility for Research (SRR)** forms a core component of the REF Code of Practice. An initial draft definition of SRR status was developed by the SRR Task and Finish Group in early 2025. This draft was subsequently discussed by the REF Steering Group in January 2025, the Research & Knowledge Exchange Committee on 28 May 2025, and the University Academic Board on the 12th of June 2025.

- Wide consultation on the draft SRR definition was undertaken in June 2025 with a range of staff networks to ensure inclusivity and transparency. The draft document was circulated to these networks, with opportunities provided for feedback via email, anonymously through network chairs, or through attendance at an information and Q&A session held on 24 June 2025. In addition, recognised trade union representatives were invited to provide feedback as part of this consultation process.
- The following networks were also consulted:
  - Staff LGBTQ+ Network
  - Disability & Neurodivergent Network (DANN)
  - 'R'EACH' (Race, Ethnicity & Cultural Heritage) Network
  - Staff Menopause Group
  - Parents & Carers Network
  - Health & Wellbeing Champions and Supporters

The following guidance issued by Research England was also taken into account in the development of this Code of Practice, specifically the REF 2029 Core Equality Impact Assessment (EIA) questions. These were used to inform decision-making and to support a fair, transparent, and inclusive approach throughout the REF preparation process.

REF 2029 CORE EIA QUESTIONS

- Eliminating unlawful discrimination
  - Could this process or decision disproportionately exclude or disadvantage people with protected characteristics?
  - Are any criteria, systems, or practices indirectly discriminatory (that is to say, neutral on the surface but unequal in effect)?
  - Have reasonable adjustments been considered or applied where appropriate?
  - Are there any legacy practices or default assumptions that could disadvantage certain groups?
- Advancing equality of opportunity
  - Have barriers to access or participation been identified and addressed?
  - Do all relevant staff groups have a fair opportunity to contribute to, benefit from, or be considered in this process?
  - Have we used disaggregated data to monitor representation, participation, or outcomes?
  - Are there opportunities to design this process in a way that proactively supports inclusion or recognises diverse contributions?
  - Have steps been taken to minimise over-reliance on metrics or conventions that may structurally exclude some groups?

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

Data on staff meeting the SRR definition was reviewed in summer 2025 (following the annual HESA staff return) to inform the final SRR definition. Institutional level data is presented below. Due to the small numbers breakdowns are not available or redacted for certain groups of staff.

Table 1 Percentage of staff broken down by protected characteristics, shown for only those with SRR and for all eligible staff.

		2024-25		2019-20	
Category	**Characteristic**	**% SRR**	**% of all eligible staff**	**% SRR**	**% of all eligible staff**
Sex	Female	60.3%	59.5%	54.4%	59.3%
	Male	39.7%	40.5%	45.6%	40.7%
Age	21-40	18.6%	22.8%	17.6%	20.8%
	41-50	37.8%	30.2%	33.8%	30.0%
	51-60	32.1%	33.7%	33.8%	38.3%
	61+	11.5%	13.2%	14.7%	10.9%
Disability	Disability Declared	17.3%	14.2%	13.2%	11.8%
	No Disability Declared	78.8%	81.5%	83.8%	82.7%
	PNTS/Unknown	3.8%	4.3%	2.9%	5.5%
Ethnicity	Black, Asian or Minority Ethnicity	7.7%	8.0%	4.4%	7.1%
	White	87.8%	89.1%	92.6%	89.1%
	PNTS/ Unknown	4.5%	2.9%	2.9%	3.9%
Orientation	Heterosexual	82.1%	84.4%	79.4%	78.7%
	LGB+	7.7%	7.0%	5.9%	4.8%
	PNTS/ Unknown	10.3%	8.6%	14.7%	16.6%
Religion	No Religion	35.3%	42.6%	54.4%	36.9%
	Religious - Christian	46.2%	40.3%	23.5%	40.9%

	Religious - Other	6.4%	7.0%	7.4%	8.8%
	PNTS/ Unknown	12.2%	10.1%	14.7%	13.4%
FTE	Full Time	73.7%	60.7%	63.2%	48.4%
	Part Time	26.3%	39.3%	36.8%	51.6%

Notes:

% SRR: % of total SRR employees with this protected characteristic
% of All Eligible Staff: % of total REF eligible employees with this protected characteristic

Step 4: Assessing the change in relation to potential impact on the university's diverse community

	Acknowledge Potential Positive, Negative or Neutral Impact on Groups	**Describe the impact where relevant and outline how you will mitigate/justify potential negative impact or amplify positive impact.** Examples of considerations: • Does application of the change lead to any form of discrimination, harassment, victimisation or less favorable treatment? • what barriers have been identified/removed? • gaps in information • physical changes • language updates • accessibility changes and developments • curriculum change • positive action • opportunity to foster good relations	**Person responsible**	**Target date**	**Progress to date**
Age (consider older people, younger people, early-career researchers etc.)	Negative	In considering the definition of Significant Responsibility for Research (SRR) within the Code of Practice, it was noted that the requirement for a minimum contract duration of three years under *Element 2,*	PVC-Research	April 2026	Removed the reference to the 3-year period in *Indicator 2.1* from the final version of the CoP

		Indicator 2.1 has the potential to disproportionately affect younger staff, who are statistically more likely to be employed on fixed-term contracts. However, analysis of SRR data by age group, benchmarked against the overall age profile of REF-eligible staff, does not identify any significant discrepancies. While there is a slight over-representation of staff aged 40–50 holding SRR status, this is considered an expected outcome, reflecting typical career progression and higher levels of sustained research activity within this cohort. Furthermore, under REF 2029, institutions are no longer required to submit individual staff members, and research outputs are fully decoupled from individuals. In this context, the processes described in the Code of Practice do not disadvantage staff on the basis of age, as eligibility for output submission is not contingent on SRR status. This mitigates the risk of adverse impact arising from contract type or career stage. Unconscious bias training, delivered through mandatory e-learning, alongside REF-specific equality, diversity and inclusion (EDI) training, will be provided to all staff involved in REF-related decision-making. This will help to mitigate			

		the risk of discrimination at selection stages and throughout the REF process.			
Disability (including mental health and non-visible disability)	Neutral	If colleagues are absent on a long-term basis due to disability, they may be unable to meet the requirement to demonstrate use of more than 75% of their RASA allocation for research activities and therefore may not be eligible for inclusion on the SRR list. However, the introduction of the self-declaration route mitigates this risk. In all cases, research outputs produced by these colleagues will remain eligible for submission to REF, irrespective of SRR status. Unconscious bias training, delivered through mandatory e-learning, alongside REF-specific equality, diversity and inclusion (EDI) training, will be provided to all staff involved in REF-related decision-making. This will help to mitigate the risk of discrimination at selection stages and throughout the REF process.	PVC-Research	2028	
Gender reassignment (including Trans and non-binary people, gender identity and gender expression)	Neutral	**Considered, with no impact identified.** If colleagues require time off for appointments, or reasonable adjustments due to gender reassignment, their research outputs will nevertheless remain eligible for submission to REF, irrespective of SRR status Unconscious bias training, delivered through mandatory e-learning, alongside REF-specific equality, diversity and	PVC-Research	2028	

		inclusion (EDI) training, will be provided to all staff involved in REF-related decision-making. This will help to mitigate the risk of discrimination at selection stages and throughout the REF process.			
Marriage and civil partnership	Neutral	**Considered, with no impact identified.**	PVC-Research	2028	
Pregnancy and maternity (including adoption)	Negative	Where maternity leave or flexible working arrangements result in long-term absence from work (for example, 9–12 months), colleagues may be unable to meet the requirement to demonstrate use of more than 75% of their RASA allocation and therefore may not be eligible for inclusion on the SRR list. However, the introduction of the self-declaration route mitigates this risk. In all cases, research outputs produced by these colleagues will remain eligible for submission to REF, irrespective of SRR status. In addition, appropriate adjustments and support can be put in place where required, recognising that there is no fixed expectation for any individual staff member to be included in the REF output pool. Unconscious bias training, delivered through mandatory e-learning, alongside REF-specific equality, diversity and inclusion (EDI) training, will be provided to all staff involved in REF-related	PVC-Research	2028	

		decision-making. This will help to mitigate the risk of discrimination at selection stages and throughout the REF process.			
Race	Neutral	**Considered, with no impact identified.** Unconscious bias training, delivered through mandatory e-learning, alongside REF-specific equality, diversity and inclusion (EDI) training, will be provided to all staff involved in REF-related decision-making. This will help to mitigate the risk of discrimination at selection stages and throughout the REF process.	PVC-Research	2028	
Religion and belief (including those without religion or belief)	Neutral	**Considered, with no impact identified.** Unconscious bias training, delivered through mandatory e-learning, alongside REF-specific equality, diversity and inclusion (EDI) training, will be provided to all staff involved in REF-related decision-making. This will help to mitigate the risk of discrimination at selection stages and throughout the REF process.	PVC-Research	2028	

Sex	Neutral	**Considered, with no impact identified.** Analysis of staff data, based on the 2024–25 HESA Staff Return, indicates that the proportion of male and female staff identified as having Significant Responsibility for Research closely mirrors the proportion of all REF-eligible male and female staff, respectively. This suggests no differential impact due to sex of the staff in the application of the SRR criteria. Unconscious bias training, delivered through mandatory e-learning, alongside REF-specific equality, diversity and inclusion (EDI) training, will be provided to all staff involved in REF-related decision-making. This will help to mitigate the risk of discrimination at selection stages and throughout the REF process.	PVC-Research	2028	
Sexual orientation	Neutral	**Considered, with no impact identified.** Unconscious bias training, delivered through mandatory e-learning, alongside REF-specific equality, diversity and inclusion (EDI) training, will be provided to all staff involved in REF-related decision-making. This will help to mitigate the risk of discrimination at selection stages and throughout the REF process.	PVC-Research	2028	
Other (e.g. International, part-time, fixed-term, Armed Forces,	Negative	In considering the definition of Significant Responsibility for Research (SRR) within the Code of Practice, it was noted that the requirement for a minimum contract	PVC-Research	2026	Removed the reference to the 3-year period in *Indicator 2.1* from the final version of the CoP

socio-economic etc) **Staff on Fixed Term Contracts**		duration of three years under *Element 2, Indicator 2.1* has the potential to disproportionately staff who are employed on fixed-term contracts.			

Step 5: Next steps. Please consider:

- Is further monitoring/engagement required?
- How will you measure mitigation in regards to potential negative impact?
- How will you measure maximizing potential positive impact?
- When will you review this EIA?

In advance of SRR decisions being made (August 2026 and August 27), UoA leads will be provided with an update on SRR EIA data, to ensure ongoing awareness of any disparities in inclusion, and allow time for meaningful action plans to be drawn up and gain momentum, alongside writing of SPRE narratives.

An EIA will be conducted at the point of the final REF submission, considering the REF process as a whole, including SRR and Research Independence definitions as well as the process and timelines and the other elements of REF.

Reports will be presented to the UoA leads, REF steering Group, and RKE committee, with clear recommendations, actions and owners, and oversight by the Academic Board.

Step 6: Final review

Final review where equality impact was identified. Lead colleague has reviewed and is satisfied it can be submitted to the EDIW Monitoring Group. (Please send your EIA to EIASubmissions@cumbria.ac.uk for review and final approval. If approved, the EDIW Monitoring Group will return a dated copy and if referred, guidance will be provided for consideration before resubmitting).

EDIW Monitoring Group approved:	Date:	30/04/2026