GUIDANCE FOR RESEARCH ORGANISATIONS ON HOW TO IMPLEMENT RESPONSIBLE AND FAIR APPROACHES FOR RESEARCH ASSESSMENT

SUMMARY OF CONSULTATION ON DRAFT GUIDANCE

Overview
Wellcome has developed guidance to assist research organisations in embedding fair and responsible approaches to research assessment. This is in line with the requirement in our open access policy 2021 that our funded organisations must publicly commit to the principle that research outputs be judged based on their intrinsic merit, and not on the venue of publication.

We published a draft version of this guidance on 6 January 2020, called “Guidance for research organisations on how to implement the principles of the San Francisco Declaration on Research Assessment”. We invited comments and feedback from organisations and the wider community via a short web form.

We received 54 responses to the consultation, which closed on 24 February 2020. This included 44 organisational responses and 10 responses from individuals.

Most respondents were based in the UK, and the vast majority of organisational responses were from UK universities and other research institutes funded by Wellcome. We also received responses from other areas of the world, including the USA, Europe and Africa.

Overall, the feedback we received was enormously helpful and constructive, and we are grateful to everyone who took the time to respond. Many respondents were very supportive of the goals of the guidance and noted that it aligned well with their existing commitments to these principles and to the San Francisco Declaration on Research Assessment (DORA) and related declarations. They raised a number of useful suggestions for how the guidance could be further improved.

This document provides an overview of the key themes raised in the feedback, and how we have addressed these in the final version of the guidance.

Emphasis on DORA
Several respondents suggested that the draft guidance was too heavily focused on DORA and that it would be more relevant and useful to them and their communities if it addressed responsible and fair metrics more broadly.

We have tried to address this in the final guidance, including by changing the title.

While the two core principles at the heart of the guidance are taken from DORA, we are clear that organisations can implement these as part of a broader approach to embedding the responsible and fair use of metrics that aligns with their own mission and values.

We are also absolutely clear that, while organisations may choose to explicitly support DORA and/or the Leiden Manifesto or a related declaration, there is no explicit requirement to sign up to any declaration.

Monitoring and reporting
Respondents also requested more clarity around the information that should be collected in order to monitor and report on the implementation of the principles, and the reporting that Wellcome will require. Some respondents, in particular those from smaller organisations, expressed concerns that
some of this information would be too burdensome to collect. Others highlighted the difficulty of collecting particular types of metrics in their own organisational context.

We have reworked this section to make it clear that Wellcome will require organisations to provide assurance that they have a proportionate process in place to monitor and review implementation of the principles. We will not require detailed reporting against specific metrics. We will also explore how we can facilitate the sharing of monitoring good practice examples between organisations.

**Link between the guidance and requirement in Wellcome’s new open access policy**

Some respondents felt the guidance was inconsistent with the requirement in Wellcome’s open access policy 2021. We have tried to set out more clearly how the guidance flows from, and relates to, the policy.

**Organisations who have established processes already in place**

Several respondents noted that their organisations were already well advanced in implementing processes for responsible use of metrics and were concerned that the guidance was asking them to establish duplicative or parallel processes.

We have tried to make it absolutely clear in the final guidance that this was not our intention – we will not expect organisations to develop new statements, implementation plans or activities where equivalent processes are already in place. We have also tried to be clearer that work to implement responsible use of metrics need not be a stand-alone activity – it can be part of wider activities to improve research culture and support research integrity.

**Prescriptive and non-prescriptive elements**

Some respondents were concerned that the guidance was too prescriptive, and others were concerned about how adherence to the guidance would be assessed. We have tried to be clear that, from January 2021, Wellcome may ask as part of its regular audit processes that organisations provide assurance that they have:

- a clear public statement on their commitment to the principles
- a documented implementation plan which addresses the three areas specified in the guidance (or assurance that a process is in place to develop such a plan with a clear delivery date)
- a process for monitoring and reviewing progress in implementing the principles.

All other elements are non-mandatory, and organisations are at liberty to decide which of these suggested activities would be appropriate, proportionate and add value, in light of their vision, culture and ways of working.

**Sharing good practice and cross-funder coordination**

Several respondents suggested that it would be helpful to have more good practice examples. Some of these examples already exist, including on the [DORA website](https://dora.net). We will actively consider how we can work with research organisations and other partners to further identify and showcase these examples, and encourage organisations who have developed such approaches to share them with us.

**Other suggested amendments**

We have made several amendments to the guidance in response to specific points raised by respondents. These include:
• clarifying that the public statement need not constitute a stand-alone page on the website and may be part of a broader section, covering for example research evaluation or open research
• amending the text that previously referred to ‘dedicated staff’ being appointed to coordinate responsible metrics activities – recognising that this might not be feasible nor proportionate for some organisations
• clarifying that the process for staff raising cases where practices fail to embody these principles may be aligned with the organisation’s broader policies on whistleblowing
• being clear that ‘target lists’ for journals are only inappropriate where they are based on the perceived prestige associated with the journals concerned.