

Knowledge Exchange Framework (KEF) Consultation 2019

1. Introduction

Introduction

Responses to this consultation are invited from any organisation, group or individual with an interest in knowledge exchange.

If you would like to save a copy of your response, please choose 'print response' on the last page of the survey. We regret that we won't be able to accommodate requests to download and send individual responses submitted.

The responses to this consultation will be analysed by Research England, we will consult with the Knowledge Exchange Framework Technical Advisory Group and the Knowledge Exchange Framework Steering Group.

We will commit to read, record and analyse responses to this consultation in a consistent manner. For reasons of practicality, usually a fair and balanced summary of responses rather than the individual responses themselves will inform any decision made. In most cases the merit of the arguments made is likely to be given more weight than the number of times the same point is made. Responses from organisations or representative bodies with high interest in the area under consultation, or likelihood of being affected most by the proposals, are likely to carry more weight than those with little or none.

We will publish an analysis of the consultation responses. We may publish individual responses to the consultation in the summary. Where we have not been able to respond to a significant material issue, we will usually explain the reasons for this. Additionally, all responses may be disclosed on request, under the terms of the relevant Freedom of Information Acts across the UK. The Acts give a public right of access to any information held by a public authority, in this case UK Research & Innovation. This includes information provided in response to a consultation. We have a responsibility to decide whether any responses, including information about your identity, should be made public or treated as confidential. We can refuse to disclose information only in exceptional circumstances. This means that responses to this consultation are unlikely to be treated as confidential except in very particular circumstances.

For further information about the Acts see the Information Commissioner's Office website, www.ico.gov.uk or, in Scotland, the website of the Scottish Information Commissioner www.itspublicknowledge.info/home/ For further information relating to UK Research and Innovation's Privacy notice, please visit <https://www.ukri.org/privacy-notice/>

The deadline for responses to the KEF consultation is midday on **Thursday 14 March 2019**. Please direct any queries to Sacha Ayres, Senior Policy Adviser, Knowledge Exchange at KEPolicy@re.ukri.org or 0117 931 7385. *

✓ Tick here to agree and continue to consultation.

2. Respondent details

Please indicate who you are primarily responding on behalf of: *

- As an individual
- Business
- Charity / third sector
- Department or research group
- English Higher Education Institution
- Higher Education Institution in Wales, Scotland or Northern Ireland
- Public sector organisation
- Representative body
- Subject association or learned society
- Other (please specify):

3. Contact details [user]

Please provide the name of your organisation *

If you would be happy to be contacted in the event of any follow-up questions, please provide a contact name and email address.

3. Contact details [HEI]

Please provide the name of your organisation *

If you would be happy to be contacted in the event of any follow-up questions, please provide a contact name and email address.

Dr Mark Gray

3. Contact details [individual]

If you would be happy to be contacted in the event of any follow-up questions, please provide a contact name and email address.

4. KEF purpose

Do you consider that the KEF as outlined will fulfil its stated purposes?

- To provide universities with new tools to understand, benchmark and improve their performance.
- To provide business and other users with more information on universities.
- To provide greater public visibility and accountability. *

	Strongly disagree	Disagree	Somewhat disagree	Somewhat agree	Agree	Strongly agree	No opinion
To provide universities with new tools to understand, benchmark and improve their performance.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓	<input type="checkbox"/>	<input type="checkbox"/>
To provide businesses and other users with more information on universities.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
To provide greater public visibility and accountability.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓	<input type="checkbox"/>	<input type="checkbox"/>

Please provide a commentary in relation to your scores above. (400 word limit)

We **agree** that sector benchmarking will, along with the practice of continuous improvement through use of the Concordat as a reference tool (rather than reporting requirement) provide a

means of further improving our knowledge exchange work. We are concerned about increased burden but recognise that the re-use of widely used sector metrics from the HEBCI may be helpful here. We **somewhat agree** this will be of utility to business, but the benefit will depend upon their ability to use such data with judgement outside of 'league tables'. We **agree**, though, that the KEF framework provides a profile for, and record of, the achievements of HEIs.

5. Aims and overall approach of the Knowledge Exchange Framework (KEF)

Overall approach

The KEF consultation document describes the overall approach as being an annual, institutional level, largely metrics driven exercise, although noting that narrative will have an important role. More background may be found in the report summarising the recommendations of the technical advisory group. Do you consider this overall approach to be appropriate? *

- Strongly disagree
- Disagree
- Somewhat disagree
- Somewhat agree
- Agree
- Strongly agree
- No opinion

Please provide a commentary in relation to your scores above. (400 word limit)

We **somewhat agree** with the framework, but are concerned by the level of burden in reporting. Currently report of KE activity includes narrative reporting on use/yield of spent HEIF resource (October), AMS reporting on spend by type (March), revisions to the Institutional Plan (summer), and the submission of the HEBCI (December). We are also concerned about reporting requirements that could be associated with the Concordat. The use of the KEF should deliver a reduction in burden from two sources – (a) use of current HEBCI data with as little use of new data as possible (see comments on metrics) and (b) a simplification of report on HEIF use in the context of activity.

We welcome the principle of the use of contextual narrative information but hope this will be weighted significantly since otherwise - and despite the use of the Ulrichsen 'banding' - the aim to support a diversity of KE outputs across the sector and appropriate local KE will be lost. We think this element of the KEF requires closer specification (see comments below). We noted in our response to the Technical Advisory Group's consultation that the HEBCI, while a useful starting point for a light burden metrics-driven KEF, requires some revision if it is to accurately reflect the *whole* benefit to business and community from HEI engagement.

6. Clustering

The English higher education sector is very diverse. We therefore propose to create clusters of knowledge exchange peer groups. The proposed clusters and clustering approach is detailed in the KEF consultation document. Please use the following questions to provide your feedback on our proposals.

Please indicate your degree of support for the following aspects of our clustering approach. *

	Strongly disagree	Disagree	Somewhat disagree	Somewhat agree	Agree	Strongly agree	No opinion
The conceptual framework that underpins the cluster analysis.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓	<input type="checkbox"/>	<input type="checkbox"/>
The variables and methods employed in undertaking the cluster analysis.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
The resulting make up of the clusters, i.e. the membership.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓	<input type="checkbox"/>	<input type="checkbox"/>
That the overall approach to clustering helps Research England to meet the stated purposes of the KEF and ensures fair comparison.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Please provide commentary on any aspect of your scores above. If relevant please incorporate suggestions for alternative arrangements. (400 word limit)

We **agree** with the conceptual framework broadly (it is very similar to Ulrichsen, 2007) and with the designation of our own institution within it. However, we remain unconvinced with the methods used to generate the category sorting, and with the extent to which the clustering delivers the benefits sought from it. In particular we are concerned that, without background knowledge of the diversity of institutional types in the sector, users of the outputs from the KEF (notably business and community stakeholders) will be unable to make sense of it. In short we do not think the complexity of the clustering is unwarranted, but we do think that the complexity needs careful attention in communication, guidance on use and education for users.

If you are responding on behalf of an institution that is a member of the proposed specialist social science and business (SSB) or STEM clusters as listed below and you wish to provide specific feedback on the appropriateness of these clusters, please identify your cluster membership here.

SSB

- University College Birmingham
- Bishop Grosseteste University
- Heythrop College, University of London
- London Business School
- National Film and Television School

STEM

- The Institute of Cancer Research
- Liverpool School of Tropical Medicine
- London School of Hygiene & Tropical Medicine
- Royal Veterinary College
- St George's, University of London
- Cranfield University
- Harper Adams University
- Royal Agricultural University
- Writtle University College

Listed above and wish to provide further comment

Not applicable

6a. Proposed SSB & STEM Cluster feedback

[Question for those identifying as SSB & STEM cluster institutions]

As suggested by the cluster analysis report, we do not believe that the specialist cluster comprising of SSB specialist institutions is a useful or meaningful cluster in its own right.

Whilst the STEM specialist cluster is slightly larger, we recognise that there is a significant divergence in the missions of the institutions.

We therefore welcome specific responses from institutions in these two clusters on this point – do these clusters support the aims and purpose of the KEF for you?

Should members of these clusters be manually reassigned to another, or should some other approach be taken? (400 word limit)

n/a

7. Perspectives and metrics

Knowledge exchange covers an extremely diverse range of activity and it is appropriate that some HEIs will perform more strongly in different areas that align more closely with their mission and strategic goals. We have therefore proposed a range of seven perspectives. The following questions will seek your views on the number and range of perspectives and metrics proposed.

Perspectives

- Research partnerships
- Working with business
- Working with the public and third sector
- Skills, enterprise and entrepreneurship
- Local growth and regeneration
- IP and commercialisation
- Public and community engagement

Taking into account the overall range of perspectives and metrics outlined in the consultation document, do you agree or disagree that a sufficiently broad range of KE activities is captured. *

- Strongly disagree
- Disagree
- Somewhat disagree
- Somewhat agree
- Agree
- Strongly agree
- No opinion

Comments:

We **somewhat agree** – but note that there are very obvious omissions if the KEF is to be used definitively to specify the level of effective reach-out to business and community through KE. That is partly because RE needs to decide what KEF is doing – is it measuring knowledge exchange of all kinds that benefits business and communities or only that summarised in HEBCI metrics and eligible for HEIF support? For example, many universities have active work-based learning programmes leading to qualification outcomes at PG level, u/g level apprenticeships for industry or modular industry focused Masters for industry, which would not appear in HEBCI data returned but would constitute significant and effective knowledge exchange via teaching. Teaching-focused institutions might therefore appear to be *less* committed to business engagement and knowledge transfer via skills development purely because of definitions within the metrics set.

Taking into account the range of metrics outlined in the consultation document, please indicate [using a % sliding scale] whether you consider that they adequately represent performance in each of the proposed perspectives.

Research partnerships	<input type="text" value="30"/>
Working with business	<input type="text" value="40"/>
Working with the public and third sector	<input type="text" value="20"/>
Skills, enterprise and entrepreneurship	<input type="text" value="40"/>
Local growth and regeneration	<input type="text" value="20"/>
IP and commercialisation	<input type="text" value="30"/>
Public and community engagement	<input type="text" value="40"/>

Research partnerships

Taking into account the range of metrics outlined in the consultation document for this perspective, please provide any comments on the balance and coverage of the proposed metrics. (400 word limit)

We think the research partnerships metric captures some of the character of short-term collaboration benefit, but no more. Where the expectation of industry contribution in collaborative programmes is fixed as a percentage of project cost, would the first metric measure anything more than that an institution had participated? If not, the *whole* value of collaborative research, not just the cash/in-kind leverage, would be a better measure.

In relation to the second metric in the set ('Co-authorship with non-academic partners') we find it hard to see how sufficient limits could be set so as to rule out inherent bias and a 'double benefit' in some circumstances. Take one example: an HEI with a large number of spin-outs, and benefitting from it under the 'IP and commercialisation' metric, might ask some academic staff in companies to author as members of the company and others to author from a departmental affiliation to maximise the benefit to the institution. Policing and auditing the metric would be complex and difficult. It is not clear, in fact, that a 'co-authorship' metric is best tracked and recognised in the KEF or the REF: perhaps the latter is more appropriate, and less open to 'gaming'.

Working with business

Taking into account the range of metrics outlined in the consultation document for this perspective, please provide any comments on the balance and coverage of the proposed metrics. (400 word limit)

We think the metrics set proposed here do a better job of capturing the extent of joint working, but that RE needs to guard against the public perception that this is the only dimension of collaboration with business. In reality a university's profile of collaboration with businesses will cover metrics 1,2, 4,5 and part of 6. It may be that the metric set here is better described as 'Structured research and consultancy support to business'.

Working with the public and third sector

Taking into account the range of metrics outlined in the consultation document for this perspective, please provide any comments on the balance and coverage of the proposed metrics. (400 word limit)

Working with third sector and public organisations takes many forms – few of which are captured by the proposed metrics set. For example, collaboration in the arts may take the form of joint work on productions or exhibitions. The metrics proposed only reflect a small subset of such interactions – many of which appear elsewhere in the proposed metrics set (notably some aspects of 'Public and community engagement'). Again our concern is partly that the metrics descriptor will suggest that contract research and consultancy represents the whole of collaborative working with these sectors and not a subset of them.

Skills, enterprise and entrepreneurship

Taking into account the range of metrics outlined in the consultation document for this perspective, please provide any comments on the balance and coverage of the proposed metrics. (400 word limit)

This metric represents a significant departure from the assumption, in HEIF formula calculation, that HEBCI CPD data is not to be relied upon. This is welcome.

However, the definitions used in the HEBCI are unusually restrictive if these data are taken to reflect the extent to which work on skills of wider benefit to the economy is occurring in an institution. HEBCI CPD/CE, for example, specifically excludes whole classes of economically beneficial curriculum delivery for UK organisations – notably apprenticeships and the other classes specifically excluded in the HEBCI guidance for Head 3. Importantly, the HEBCI CPD definition excludes students ‘if they are known to be following a traditional education path’. This would dissuade HEIs from offering integrated industry-facing part-time award-bearing PGT, part-time work-based learning etc., and if the metric set here becomes the focus for recognition, this might reduce the extent of valuable work in the sector.

We think it might be better to use additional metrics to capture the extent of skills support from the sector – e.g. E&SFA data on apprenticeship starts for those already in work, bespoke award-bearing full-time and part-time provision – in addition to the proposed first two metrics of this set.

We think the third metric in the set is important, but are not sure that the definition in the HEBCI allowing inclusion (evidence of ‘formal business/enterprise support’) captures the reality of graduate business venturing in many circumstances. Student enterprise may arise from use of support from the non-HE partners of an institution, and it would be wrong to class this as ineligible. We think that, as in so many areas of the proposed metrics set, either the description and specification of what is being measured needs to change, or the HEBCI guidance needs to change.

Local growth and regeneration

Taking into account the range of metrics outlined in the consultation document for this perspective, please provide any comments on the balance and coverage of the proposed metrics. (400 word limit)

Note there is a separate question to consider the use of supplementary narrative.

Our concern here principally relates to the narrative statement. The context for work in growth and regeneration will vary significantly across the country: some localities will have central government driven agendas for regional growth and regeneration, others will have regional ones, some will have sub-regional or only local initiatives in their area. This context is important. An HEI in a part of the country without a national focus for growth and regeneration might be at a disadvantage unless the guidance for the narrative statement and contextual information makes clear that it is evidence of appropriate involvement and not the scale of opportunity for involvement that is being revealed.

We think that, in the context of Brexit negotiations having moved involvement in EU regeneration programmes (ESIF etc.) into the Political Declaration, the possibility of a ‘no deal’ outcome remaining real, and no clarity on the scope for involvement in structural funds in the event of a deal-based exit – and with EU funding representing a significant proportion of regeneration funding open to HEI participation – it might be better to decide on the numerical element of the metrics set (£ of regeneration income per staff fte) later.

IP and commercialisation

Taking into account the range of metrics outlined in the consultation document for this perspective, please provide any comments on the balance and coverage of the proposed metrics. (400 word limit)

We recognise that this is a necessary part of the metrics set, but are concerned that no narrative statement is taken to balance the preference given to licensing as a source of knowledge exchange through IP transfer. R&D collaborations with joint IP, in-kind benefits from access to IP and open access (CC etc.) to IP all feature in this institution's practice.

We are also concerned that the proposed ratio measures (e.g. licensing income as a proportion of research income) favour long established institutions. Institutions growing their research capacity but not yet able to exploit sufficient IP to make returns in the same proportion as established institutions would be effectively penalised in the comparison – and if the ratio of licensing income to research income were the guiding metric, they would be better off not growing their research base at all and only developing research that could be commercialised. We think thought needs to be given to whether this element of the KEF is well aligned with the ambitions of the REF to establish clear narrative plans for the growth of research capacity in areas of excellence.

Public and community engagement

Taking into account the range of metrics outlined in the consultation document for this perspective, please provide any comments on the balance and coverage of the proposed metrics. (400 word limit)

Note there is a separate question to consider the use of supplementary narrative.

This is the most suspect of all of the metric sets proposed. We feel, for reasons we set out in some detail in our response to the earlier metrics consultation, that the HEBCI Table 5 data is not reliable as an indicator of the degree of commitment of an institution to public and community engagement. It ignores, for example, all digital engagement and only allows museum and gallery activities to be included where they are 'held at museums and galleries owned by the reporting HEP' – so that touring exhibitions, deliberately planned to ensure the widest possible audience and engagement, cannot be included. The definitions in Table 5 are, therefore, insufficiently generous to allow much innovative engagement work to be included, and we are not convinced the narrative/contextual statement will overcome this.

8. Supplementary narrative

We consider that for two perspectives, that on their own, the existing metrics do not provide sufficient measure of the scale and variety of activities undertaken by higher education institutions (HEIs).

We intend to work with the sector to develop, where possible, metrics that will capture the outcomes derived from all types of knowledge exchange in the future. In the mean time we propose to supplement both the Local Growth & Regeneration and Public & Community Engagement perspectives by requesting a narrative statement from each provider to set out the main strategic goals, activities, outputs and potential outcomes achieved.

Do you consider it appropriate for HEIs to provide narrative text to support the metrics in perspectives that don't currently have fully developed metrics? *

- Strongly disagree
- Disagree
- Somewhat disagree
- Somewhat agree
- Agree
- Strongly agree
- No opinion

Public and community engagement narrative

Overall, is the guidance on the provision of narrative text for this perspective clear. *

- Strongly disagree
- Disagree
- Somewhat disagree
- Somewhat agree
- Agree
- Strongly agree
- No opinion

Please comment on the proposal to include narrative from HEIs for the public and community engagement perspective, in particular: - where further clarification is required- where refinements could be made- whether there are areas where more consistency across HEIs could be achieved (400 word limit)

We are concerned that, while the HEBCI Table 5 data is insufficiently robust to allow a proper evaluation of engagement work across all HEIs equally, the proposed narrative statement is insufficiently clear. Importantly the consultation statement says that 'we are not seeking to limit what forms of community a particular HEI may engage with', and while we are grateful for the implied generosity of recognition of sector variations, this is unlikely to mean that the narrative and contextual information can consistently balance out the HEBCI Table 5 data. We welcome the inclusion of engagement – and a narrative of strategic ambitions for engagement – in the KEF, but think this requires a good deal more definitional work if it is to be of value. Overall we think that the value of engagement work ought to be revealed by KEF, and this needs concerted focus.

Local growth and regeneration narrative

Overall, is the guidance on the provision of narrative text for this perspective clear. *

- Strongly disagree
- Disagree
- Somewhat disagree
- Somewhat agree
- Agree
- Strongly agree
- No opinion

Please comment on the proposal to include narrative from HEIs for the local growth and regeneration perspective, in particular:

- where further clarification is required
- where refinements could be made
- whether there are areas where more consistency across HEIs could be achieved (400 word limit)

The narrative proposed is more clearly drawn than that for the public engagement element of the return, and we welcome this, but we would suggest that RE should pause on the definition used for the focus of the narrative ('targeted KE activity where higher education institutions, businesses, public sector and the wider civil society work together to achieve a strategic goal...'). Often an HEI may make a contribution to local or regional growth without a regional strategic context (e.g. opening study centres in new areas of housing concentration, or supporting arts provision in expanding urban areas); should these be included in the scope of the narrative statement or not?

The role of further narrative or contextual information

We welcome responses on what other types of narrative or contextual information would be helpful.

You may wish to consider, for example:

- Should the HEI or Research England provide other narrative information?
- How should we use other contextual information, such as information on local economic competitiveness described in section 5 of the cluster analysis report?
- Would other perspectives benefit significantly from further narrative information?
- Would the benefit of adding further narrative information be outweighed by the burden of doing so? *

	Strongly disagree	Disagree	Somewhat disagree	Somewhat agree	Agree	Strongly agree	No opinion
Overarching institutional statement - provided by the HEI	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Overarching institutional	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>				

Strongly disagree Disagree Somewhat disagree Somewhat agree Agree Strongly agree No opinion

statement - provided
by Research
England

Comments:

Lighter burden would always be preferred, but some thought should be given to making use of existing published information on an HEI's strategy as a means of adding additional contextual information for users.

9. Visualisation

We have provided further information including example visualisations of the KEF within the consultation document.

Visualisation

Please indicate [using a % slider scale] your level of support for the proposed method of comparison and visualisation

Each of the seven perspectives is to be given equal weighting. 100

Metrics under each perspective are to be normalised and summed. 100

The performance of each HEI is to be expressed in a radar chart in deciles, relative to the mean average decile of the peer group. 50

Perspectives are not intended to be aggregated into a single score. 100

Narratives are to be presented alongside the metric score, making it clear that metrics in the two perspectives of public & community engagement and local growth & regeneration are provisional, and should be read in conjunction with the narratives. 70

Visualisation is to be delivered through an interactive, online dashboard which will allow exploration of the data underlying the 'headline' results in various ways. 50

Please comment on the presentation and visualisation proposals, for example:

- where further clarification is required
- where refinements could be made
- whether there are areas where more consistency across HEIs could be achieved- how narratives could be incorporated?
(400 word limit)

Our concerns relate to the statistical distribution differences between peer groups, and how these may not be foregrounded in the visualisation. There will be some skewness/kurtosis differences in distributions which are themselves characteristics of the peer groups. For example, it is possible that well established older institution peer groups are likely to have a smaller 'tail' than newer institutions. We advocate care in ensuring the relative performance of institutions is understood in the context of peer group types.

We are also concerned that the work on narrative components is currently insufficiently robust (as indicated in responses above) to allow them to do the necessary work of fairly moderating

the metrics judgements.

10. Implementation

We will pilot the implementation with a group of HEIs as described in the consultation document.

Please provide any comments about the implementation of the KEF. (200 word limit)

No comments.

11. Any other comments

If you have any other comments, please share them here. (400 word limit)

No further comments