

# Knowledge Exchange Framework (KEF) Consultation 2019

## Page 1: Introduction

Q1. Introduction If you would like to view the questions included in this consultation before submitting your response, an export of the questions for reference purposes is available on the Research England website here: <https://re.ukri.org/documents/2019/summary-of-kef-consultation-questions/> Please return to this online version to submit your response. 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](http://www.ico.gov.uk) or, in Scotland, the website of the Scottish Information Commissioner [www.itspublicknowledge.info/home/](http://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](mailto:KEPolicy@re.ukri.org) or 0117 931 7385.

Tick here to agree and continue to consultation.

## Page 2: Respondent details

Q2. Please indicate who you are primarily responding on behalf of:

Representative body

## Page 3: Contact details user

Q3. Please provide the name of your organisation

MillionPlus, the Association for Modern Universities

Q4. If you would be happy to be contacted in the event of any follow-up questions, please provide a contact name and email address.

alanpalmer@millionplus.ac.uk

## Page 6: KEF purpose

Q8. 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.				X			
To provide businesses and other users with more information on universities.				X			
To provide greater public visibility and accountability.			X				

Q9. Please provide a commentary in relation to your scores above. (400 word limit)

The proposed KEF represents an increased level of information in a more streamlined format for business and other users, with the dashboard created from data and metrics that already exist. Therefore, the focus must be on how to add value for universities, businesses, the general public and policy makers. Research England will need to ensure that it engages effectively with current and potential users of this information so that they can access it easily, understand it properly and use it correctly. However, the KEF does not cover the full range and breadth of knowledge exchange practice, e.g. the significant impact universities can have on regional economies in terms of skills and talent development of individuals. The relationships between people in knowledge exchange activities - particularly as they cut across the traditional concepts of teaching and research - and their benefits need to be recognised and rewarded.

Public visibility and accountability may well be improved by the new KEF dashboard, but it's not clear this will make universities more accountable. To whom, and for what purpose?

The tools and information are there to hold universities to account. Accountability is often used negatively; the KEF dashboard approach has the potential to promote the positive benefits of knowledge exchange by universities. This should be a key underpinning principle of how this information is presented and used.

The KEF has huge potential to help universities and those involved in the sector better explain and demonstrate the role that universities play in society, in a clear, well presented format. The KEF therefore could have a great use in communicating externally with a range of different actors. This must be a key focus of the work. It is vital the KEF is able to demonstrate the value of universities as a "one-stop shop" for user engagement with higher education. Significant value is derived from multi-layered, long-term relationships between universities and users, be they businesses, public sector or community stakeholders.

There will be a challenge in balancing the "internal" aims of the KEF - e.g. to provide universities with benchmarking tools to understand their performance - and the "external" aims of the KEF, for example in amplifying the voices of users, that is those outside the sector. A detailed understanding of who exactly will use the KEF, and how it will be used is critical to appreciating its limitations and capabilities and making it as effective as possible.

## Page 7: Aims and overall approach of the Knowledge Exchange Framework (KEF)

Q10. 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?

Somewhat agree

Q11. Please provide a commentary in relation to your scores above. (400 word limit)

The success of KEF will rely heavily on the accuracy of inputs regarding HE-BCI data. There is widespread acknowledgement that there is a much greater variation in the way data is calculated and submitted for HE-BCI data compared to other HESA returns, which are very uniform in comparison. The KEF is likely to put this data under a greater level of scrutiny, by enhancing its profile and increasing its use inside and outside of the sector. More work done on how institutions could iron out inconsistencies in this regard will avoid universities being unfairly treated in the KEF.

A largely metrics-driven approach is in keeping with other frameworks and bodies in the sector and MillionPlus would support this to the extent that universities will be looking for some level of consistency in methodology in the different exercises on which they are judged or assessed. However, MillionPlus would not agree with an approach which was exclusively based on quantitative data, and purely metrics-driven. As is acknowledged in the KEF consultation document, in some perspectives there are an insufficient range of metrics available to convey adequately a university's activity in this area.

MillionPlus has some concern that allowing for a narrative in only two of the seven areas could prove problematic in the long term. This is because the inclusion of a narrative in these two perspectives could also have an impact on the perception of value of the different perspectives of KEF. The potential negative effect of this could be that two perspectives become isolated and overlooked by those who are interpreting the information. There is a risk of unintentionally creating a hierarchy that assumes metrics are inherently more valuable than narratives.

MillionPlus therefore requests that the panel consider the possibility of incorporating a more qualitative element e.g. space for more of a narrative in more of the areas included in the KEF, or in an overall narrative statement that enables a university to provide strategic context, similar to the way that narrative statements in TEF and REF work. This does not necessarily mean a reduced focus on metrics, but a more even spread of qualitative and quantitative throughout the different aspects of the framework may help to avoid areas being singled out and overlooked as inferior or separate from the majority of those in the framework.

## Page 8: Clustering

Q12. 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
<b>The conceptual framework that underpins the cluster analysis.</b>					X		
<b>The variables and methods employed in undertaking the cluster analysis.</b>					X		
<b>The resulting make up of the clusters, i.e. the membership.</b>					X		
<b>That the overall approach to clustering helps Research England to meet the stated purposes of the KEF and ensures fair comparison.</b>			X				

Q13. Please provide commentary on any aspect of your scores above. If relevant please incorporate suggestions for alternative arrangements. (400 word limit)

MillionPlus believes that the conceptual framework that underpins the cluster analysis is sound and well-thought out. It is a key strength that from the outset that the approach appreciates the diversity within the UK sector, and the value therein, and does not seek to punish or disadvantage institutions as a result of heterogeneity. The approach to clustering reduces the risk of individual institutions being compared unfairly to others with greater resources, that work on a large scale, or who have vastly contrasting missions, and enables universities to promote their own strengths in context.

One area where the consultation still leaves much unexplained with regards to the clusters is the extent to which the groupings are fixed. Will cluster memberships change? If so, in what time period are they fixed and on what conditions will they be subject to change? Universities will develop and grow at different rates, especially in a market-based system that the OfS has the intention of fostering. For this reason, the appropriate rules and conditions should be in place to respond to any such fluctuations which might impact on the KEF clusters. There is a risk of stasis if there is no mechanism to review the clustering in future years, whether to allow for universities to move, or to accommodate potential new providers.

Perhaps inadvertently, the descriptors for Clusters J and M are expressed negatively (the use of the word 'limited') in particular. This may suggest to users that these universities are "less good" at research than Clusters, E, V and X, and that those in J and M are being compared to the other three main clusters. It would be better to describe all clusters in positive terms, and without implying comparison with other clusters.

Q14. 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 Med 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

Not applicable

Q16. 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.

Somewhat agree

**Comments:**

MillionPlus supports the range of perspectives that are being proposed, which reflect the broad conception of knowledge exchange that exists in the UK sector, one which places particular emphasis on exchange rather than transfer. However, we would echo some of the points made in our answer to question 4, that KEF may not be able to capture the full breadth, range and diversity of knowledge exchange activities.

Q17. Taking into account the range of metrics outlined in the consultation document, please indicate whether you consider that they adequately represent performance in each of the proposed perspectives.

<b>Research partnerships</b>	60% support
<b>Working with business</b>	40% support
<b>Working with the public and third sector</b>	40% support
<b>Skills, enterprise and entrepreneurship</b>	60% support
<b>Local growth and regeneration</b>	20% support
<b>IP and commercialisation</b>	80% support
<b>Public and community engagement</b>	20% support

Q18. Research partnerships Taking into account the range of metrics outlined in the consultation document for this perspective, please provided any comments on the balance and coverage of the proposed metrics. (400 word limit)

MillionPlus questions whether the full extent of and impact of partnerships would be sufficiently captured in the metrics as proposed in the consultation document. MillionPlus would therefore recommend that the KEF use an additional metric in this perspective to account for the impact of other collaborative relationships in addition to conventional research partnerships alone. There seems at present a general consensus that the KEF should be based on the overall capability of institutions distinguished by their mission and context, not through a peer-reviewed process focused on knowledge exchange impacts at a single point in time.

Secondly, MillionPlus would recommend that Research England explore the possibility of also offering percentages for each of the proposed metrics in this perspective (collaborative research/outputs/impact) that are in the local region. There is a growing movement in the sector to underline the importance of place and such a step may contribute in some way to a better understanding of how universities play roles as 'civic' or 'anchor' institutions. This would complement the local growth perspective, but highlight the important role played by research collaborations.

**Q19. Working with business** Taking into account the range of metrics outlined in the consultation document for this perspective, please provided any comments on the balance and coverage of the proposed metrics. (400 word limit)

Both universities and businesses make a point of explaining that the value of working relationships is not solely determined by the amount of money that is generated for either side. Moreover, both sets of organisations will emphasise that relations and networks that add value but are not always contractual or even fully formalised. Businesses place particular emphasis on the value of long-term, strategic partnerships with universities. It is questionable whether a purely metric-based approach, which is reported annually and based on three-year averages, can fully capture what Research England representatives themselves have referred to as the “nature and development” of strategic relationships, no doubt a principal objective of the KEF. MillionPlus believes, therefore, that it would be wise to consider including a space for the input of some form of narrative or qualitative context in this section, in keeping with comments made in section 5 (see above).  
Where universities have a high volume of partnerships/relationships but a low income (e.g. a university that works with a large number of very small businesses) it is possible that a metric that looks at this source of income as a proportion of total income may undervalue the work of these universities. The example of HEIF exclusion is worth noting here.

**Q20. Working with the public and third sector** Taking into account the range of metrics outlined in the consultation document for this perspective, please provided any comments on the balance and coverage of the proposed metrics. (400 word limit)

The current set of metrics would not account for what is commonly referred to as the “public space” role that universities often play in their region. Universities provide support, both physical in terms of infrastructure and facilities and more abstracted in terms of the establishment of networks and personal relationships, that organisations benefit from. In this sense, universities create platforms or spaces upon which other organisations can flourish, either with the direct involvement of higher education institutions or not.  
Public and third sector organisations, like businesses, also value long-term strategic partnerships with universities. For similar reasons those given above (see working with business section) MillionPlus would recommend that the inclusion of some form of narrative or more qualitative input be considered for this perspective, once again in keeping with comments made in section 5.

**Q21. Skills, enterprise and entrepreneurship** Taking into account the range of metrics outlined in the consultation document for this perspective, please provided any comments on the balance and coverage of the proposed metrics. (400 word limit)

MillionPlus would argue that in order for this perspective to reflect the value of skills that are generated either through or in partnership with a university, some acknowledgement should be given to the degree to which these skills are a response to need in the locality or region of the institution. For example, the central role an institution may play in education the workforce in a nearby car manufacturing plant that is crucial to the regional/local economy. Therefore, MillionPlus would advocate the inclusion of any metrics that could in some way account for this factor in this perspective.

**Q22. Local growth and regeneration** Taking into account the range of metrics outlined in the consultation document for this perspective, please provided 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.

MillionPlus would advocate that Research England investigate the possibility of creating a metric that in some way measured how facilities or physical spaces of the university are used by local businesses and organisations (both paid and free) to assess the level to which university infrastructure acts as a hub or a platform for other actors to generate growth and regeneration. There is data on facilities and equipment in the HE BCI data so this might be one possible approach. An alternative would be to provide guidance to universities that this is the sort of area for consideration when creating the narrative statement for this perspective.

Q25. 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 agree

Q26. Public and community engagement narrative Overall, is the guidance on the provision of narrative text for this perspective clear.

Agree

Q27. 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)

As there are currently insufficient metrics in this perspective, it is appropriate to allow a narrative. However, as stated in our response to question 5, MillionPlus has some concern that allowing for a narrative in only two of the seven areas could prove problematic in the long term. This is because the inclusion of a narrative in these two perspectives could also have an impact on the perception of value of the different perspectives of the KEF. The potential negative effect of this could be that these two perspectives become isolated, overlooked by those who are interpreting the information. There is a risk of creating a false hierarchy that assumes metrics are inherently more valuable than narratives.

Q28. Local growth and regeneration narrative Overall, is the guidance on the provision of narrative text for this perspective clear.

Agree

Q29. 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)

As there are currently insufficient metrics in this perspective, it is appropriate to allow a narrative. However, as stated in our response to question 5, MillionPlus has some concern that allowing for a narrative in only two of the seven areas could prove problematic in the long term. This is because the inclusion of a narrative in these two perspectives could also have an impact on the perception of value of the different perspectives of KEF. The potential negative effect of this could be that two perspectives become isolated, overlooked by those who are interpreting the information. There is a risk of creating a hierarchy that assumes metrics are inherently more valuable than narratives.

Q30. 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
<b>Overarching institutional statement - provided by the HEI</b>						X	
<b>Overarching institutional statement - provided by Research England</b>	X						

**Comments:**

There may be a case for Research England to offer a narrative post-assessment, in a similar fashion to the state of the nation/ REF Manager reports. This would be at the perspective or cluster level and may offer a useful contextual statement about the strengths and diversity of the sector in a way that is easily digestible, without reviewing all of the dashboards. However, we do not believe it is appropriate for Research England to comment on individual institutions.

**Page 12: Visualisation**

Q31. Visualisation Please indicate your level of support for the proposed method of comparison and visualisation. (A link to a video walkthrough of the KEF visualisation is available here.)

<b>Each of the seven perspectives is to be given equal weighting.</b>	100% support
<b>Metrics under each perspective are to be normalised and summed.</b>	100% support
<b>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.</b>	99% support
<b>Perspectives are not intended to be aggregated into a single score.</b>	100% support
<b>Narratives are to be presented alongside the metric score, making it clear that metrics in the two perspectives of public &amp; community engagement and local growth &amp; regeneration are provisional, and should be read in conjunction with the narratives.</b>	100% support
<b>Visualisation is to be delivered through an interactive, online dashboard which will allow exploration of the data underlying the 'headline' results in various ways.</b>	100% support



Q32. 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)

MillionPlus would contest the use of the term provisional, since this may have negative connotations which might influence those interpreting the KEF, particularly from outside of the sector. It is vital that all the different perspectives in the KEF are given the best possible chance of being regarded as equal in weighting. Use of the term provisional could cause some to regard these sections as inferior. Given that two of the perspectives will be narrative driven, it is important to ensure that these are represented with care to ensure observers see that they are of equal value to the other perspectives.

## Page 14: Any other comments

Q34. If you have any other comments, please share them here. (400 word limit)

MillionPlus would like to see more detail from Research England on how it is planned that the KEF will relate to other areas of policy (such as the REF).  
The connection to the industrial strategy needs to be considered.  
How will the KEF be used by universities as evidence for support from the planned shared prosperity fund?  
Since this is England-only, how will the KEF take into account any partnerships that are with providers or businesses in other UK nations?  
How will the KEF be comparable with other UK sources that assess the strength of knowledge exchange activity by universities (such as those collected by the funding councils or governments in other UK nations)?  
How will the KEF interact with activity that universities undertake as part of Horizon Europe (assuming the UK becomes an associated country after it exits the European Union) or any domestic alternatives (if the UK does not become an associated or third country of the programme).