Knowledge Exchange Framework – BU response

Submitted: 13th March 2019

This is a Research England [consultation survey](#) on the proposed Knowledge Exchange Framework.

Links: [Consultation document](#). [Research England documents](#). [2017 Minister letter](#). [Survey link](#).

Submission

A pilot KEF will run from Feb 2019. English HEIs eligible for Research England funding can express interest to take part to test and refine the consultation proposals by Friday 25 January (if interested read guidance at [Annex F](#) and submit short details table).

More details on the KEF and guidance on responding to the consultation questions can be found at the end of this document or [here](#).

BU's response to the metrics consultation [in January 2018 can be found here](#).

Consultation Questions

The consultation questions start at number 2 (number 1 is an agreement of the introductory information). In the original there are 3 sets of number 3 questions, we have only kept the most relevant one to BU in this summary. We have retained the consultation numbering so information can be easily transferred at the portal without number confusion.

4. KEF purpose

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

a. To provide universities with new tools to understand, benchmark and improve their performance.

b. To provide business and other users with more information on universities.

c. 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.	☐	☒	☐	☐	☐	☐	☐
To provide businesses and other users with more information on universities	☐	☒	☐	☐	☐	☐	☐

To provide greater public visibility and accountability.	☐	☒	☐	☐	☐	☐	☐

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

We do not agree that the KEF will provide university with new tools to understand, benchmark and improve their performance. The data for all of the proposed metrics (bar two) are available for, and already used by, universities to benchmark themselves. Arguably the KEF might improve the accessibility and visualisation of this existing data, but we question whether this is worth the effort of the exercise as currently proposed.

Outside of HE, we believe prospective partners and collaborators are unlikely to use or to be influenced by KEF scores. Our experience is that successful collaborations are based on personal relationships between individuals and teams, not institution-level scores and comparator benchmarking.

In addition, the view of universities via the KEF visualisations will be limited and may be misleading to stakeholders. The proposed metrics are retrospective and do not provide opportunities for universities to describe their KE strategies, investments in KE, or aims for further collaboration. This is important information for these stakeholders if they are considering engaging with universities. The metrics without this context would carry little meaning outside of HE.

As noted above, as nearly all the data is already available, we do not believe that the KEF will improve visibility or public accountability.

There is a risk that having such limited metrics will have the effect of disincentivising some valuable KE activity which is not measured, rather than incentivising and supporting enhanced KE.

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 believe that the concordat element of KEF is very important and that this should have been developed alongside this proposal.

The KEF should not be annual. KE often takes place through sustained collaborative working and annual snapshots will capture natural fluctuations in the level of activity rather than real trends (this is an existing challenge for HE-BCI). Annual reviews could lead to a short-term approach within institutions.

The REF reflects a longer term view, and this is also recognised in the new proposed timetable for the TEF. Instead we propose the KEF is run every 3-5 years.

An annual exercise will be also overly burdensome on institutions.

We disagree with a metrics-based assessment, which captures only a limited view of knowledge exchange. Metrics do not capture the long-term strength or sustainability of an institution's external engagement. Qualitative information is required to give context and enable interpretation and assessment.

The metrics are also too limited in scope. Much beneficial KE activity will not be captured by the proposed KEF metrics. An unintended consequence of this might be to encourage and reward unwanted behaviours. For example, limited IP metrics might encourage institutions to focus efforts on protecting IP (such as registering patents) rather than exploiting IP in partnership which could more effectively realise societal impact and/or expedite the flow of IP from HE into other sectors. Delivering societal impact is a key priority for the UK – this would be an unhelpful development, and it is difficult to assess through metrics alone.

We therefore believe that to add value to the existing data, KEF would need to be a more comprehensive exercise (akin to REF), and include narrative submissions.

There is an implication that assessing narratives is inherently subjective and not sufficiently robust; this is contradictory to decades of government funded research into mixed-methodologies as well as the assessment of outputs, impact and environment through the REF, and the inclusion of narrative submissions in the TEF, where they have been very important both for providing context and addressing a wider set of criteria than can be assessed via metrics.

To ensure that it is encouraging growth and development in this area, it should assess inputs to, as well as outputs from, knowledge exchange, such as an assessment of the environment and support for KE.

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[1]. 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

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[1] See Appendix 2

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

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

We understand the rationale for clustering and comparing similar institutions; however, we are concerned about the approach presented for consultation.

We are concerned about the message the clustering sends to those outside of HE. It reinforces and replicates the vertical stratification of HE by clustering institutions together in what could be construed as those of a similar 'quality'. Clustering will quickly become the basis for divisions (particularly with a metrics-based approach). Indeed, the consultation document (pages 7 and 11) alludes to this by stating 'the top 10% of institutions' and 'the bottom 10%' would be assigned differing decile ranks presented in a dashboard format. We are concerned those outside of HE may misconstrue the clusters and outcomes or that business, the third sector and the public would not understand them (these are key audiences stated in the KEF purposes / objective).

The clustering is based on a snapshot of recent performance but provides no information on the inherently different strategic approach that many of the institutions within each cluster may take, or the different regional contexts in which they operate – e.g. regional economic, employment or social contexts or other differences linked to geography, such as co-location with other institutions or accessibility to major industrial or business centres.

University profiles, strategies and performance are not static. The clustering may become outdated rather rapidly, impacting the reliability and validity of the comparisons. It is confusing to those outside HE to have a third methodology for assessing institutions alongside REF and TEF. External partners will often have relationships with institutions for a range of purposes, and using a completely different methodology for assessing, and benchmarking institutions for one aspect is confusing and may mean that the outcomes of KEF are disregarded.

We instead suggest the KEF either i) abandons the notion of clusters and releases outcomes in a similar way to REF, or ii) uses a form of linear discriminant analysis to test the veracity of the cluster for each KEF return period then use intrasector pairings to create metrics around standard

deviations so that all institutions could be benchmarked against each other in relative terms. Our preference is for the former.

6a is not relevant to BU

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.

☐ *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)

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
- a. Research partnerships
- b. Working with business
- c. Working with the public and third sector
- d. Skills, enterprise and entrepreneurship
- e. Local growth and regeneration
- f. IP and commercialisation
- g. Public and community engagement

Taking into account the overall range of perspectives and metrics outlined in the consultation document[2], do you agree or disagree that a sufficiently broad range of KE activities is captured. *

☐	Strongly disagree
☐	Disagree
☐	Somewhat disagree
☐	Somewhat agree
☒	Agree

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[2] See Appendix 3

☐	Strongly agree
☐	No opinion

Comments:

It is important to get the perspectives right as they are the foundation upon which the metrics will be based. We are broadly in agreement with the concept of having perspectives but do not agree those presented for consultation are appropriate. We believe the proposed perspectives have the potential to be misinterpreted as they are currently (by universities, reviewers and businesses/other users). We suggest they need to more explicitly incorporate a sense of place in terms of local, regional, and international. The overlap with the REF needs to be better understood, with greater articulation of how the KEF differs. Furthermore, some of the words used (such as 'enterprise') have no clear definition and there is considerable potential overlap between the perspectives. Key questions arising from the proposed perspectives include:

- Words such as 'enterprise' have no clear definition
- What is the difference between "Working with the public..." and "Public and community engagement"?
- How are "research partnerships" linked to KE in a way that isn't already covered by the REF?
- When working with a local business this could fall under both "Working with business" and also "Local growth and regeneration".
- The public sector and third sector perspective is too wide to be useful. The third sector is very different to the public sector and there is no rationale for placing these in the same category. In addition, this perspective does not acknowledge the priorities for Government in pushing collaboration (through LEPs) and therefore driving economic growth and development.
- How would major partnership work (such as substantial economic development initiatives where public, private and third sectors work collaboratively, especially through the LEPs) fit into the proposed perspectives?

To be useful, the perspectives must be clearly defined and differentiated from each other; this is challenging as KE rarely fits neatly into categories. Three alternative approaches could be:

1. Categorising in terms of:
   a. Ideas (subcategories: protecting IP; and exploiting IP)
   b. People (subcategories: developing entrepreneurs; developing the workforce; and engaging with the public/community)
   c. Organisations (subcategories: engaging with the private sector; engaging with the charity sector; engaging with the public sector; supporting the growth and development of start-up companies; and contributions to professional communities)
   d. Environment to support KE
2. Categorising in terms of:
   a. Corporate engagement (including skills, local growth and regeneration)
   b. Corporate sponsorship
   c. Student engagement
   d. Intellectual property
   e. Public engagement
   f. Social, community and cultural development
   g. Environment to support KE
3. Categorising, like the REF, in terms of:

> a. Outputs from KE
> b. Impact arising from KE
> c. Environment to support KE
>
> A further consideration is whether the KEF could identify contributions to wider popular media – magazines, newspapers, TV, radio, et cetera – which reach mass audiences and constitute a worthwhile and important knowledge exchange activity. An article in THE recently[3] suggested that open popular accessible accounts of research results were more beneficial in the public arena than open access publications seen only by a small specialist community.
>
> We disagree with the mixture of metrics that measure income per academic FTE and others that measure income as a proportion of research income. Measuring as a proportion of research income allows universities with low levels of KE income to do well if their research income is even lower. Income per academic FTE seems much more sensible, although this raises questions about how best to define an academic FTE in the context of the KEF, especially when KE is not an academic function recognised through the HESA academic functions. Excluding staff on teaching-only contracts or without significant responsibility for research would give universities even further incentives to move staff to teaching-only contracts which could be detrimental for academic careers.
>
> We strongly believe that metrics should be considered alongside a narrative for each perspective and that this narrative should be assessed through a process of expert peer review.
>
> Finally, we believe there should be a way of assessing the involvement of undergraduate and postgraduate students in knowledge exchange. This is a requirement of HEIF so it seems odd that it is not included in the proposed KEF.

Taking into account the range of metrics outlined in the consultation document[4], please indicate [using a % sliding scale] whether you consider that they adequately represent performance in each of the proposed perspectives.

Research partnerships	20%
Working with business	20%
Working with the public and third sector	20%
Skills, enterprise and entrepreneurship	20%
Local growth and regeneration	10%
IP and commercialisation	20%
Public and community engagement	10%

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[3] https://www.timeshighereducation.com/features/plan-s-how-important-open-access-publishing
[4] See Appendix 3

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):**

Contribution to collaborative research (cash and in-kind) as proportion of public funding (HE-BCI table 1a)
Co-authorship with non-academic partners as a proportion of total outputs (data provider TBD)

Research partnerships are considered in the REF as part of the assessment of the environment and there is the potential for considerable overlap between REF and KEF, for example, collaborative research income and co-authorship of research outputs would be double counted.

The income metric risks skewing the KEF outcomes to favour universities who partner with private organisations with resources to contribute financially and in-kind, thus creating a disincentive for universities to partner with those organisations who most need it, such as new start-ups and/or those lacking R&D capacity or public sector bodies, where innovation has the potential to make an enormous difference to society, such as the NHS.

Rather than focus on income and co-authorship, we suggest the KEF considers and assesses the benefits to research partners as a result of the partnership. This would probably require a narrative rather than metrics, but it tells more about the value of the knowledge exchange activity to the research partners. This feels more in line with the purpose and aims of the KEF.

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):**

Innovate UK income (KTP and grant) as proportion of research income (Innovate UK) Contract research income with businesses per academic FTE (HE-BCI table 1b)
Consultancy income with businesses per academic FTE (HE-BCI table 2)

We suggest changing this perspective to 'engaging with business/industry' or 'engaging with the private sector' – this is about collaboration, not a transactional approach.

Again, there is an overlap with the REF as contract research income would be included in both systems.

The proposed metrics show only a limited snapshot of evidence of working with business and, the context that would be provided by a narratives essential to understanding the metrics. For example, what was the outcome/impact of the income? What was achieved? Did anything positive happen as a result?

As with the 'research with partners' perspective, there is a risk that using income metrics will incentivise universities to undertake knowledge exchange only with those businesses with the most capacity to provide funding/in-kind support, rather than those businesses which might benefit most. To address this, perhaps an additional metric (with additional weighting) could be incorporated to measure how universities are exchanging knowledge with micro-SMEs/SMEs. This would encourage universities to work with these types of business and drive UK innovation, as outlined in the Government's Industrial Strategy.

Finally, under this heading, there should be a mechanism to understand performance in terms of investment not just in academic staff, also in infrastructure to support KE with business.

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):**

HE-BCI contract research income with the public and third sector per academic FTE (HE-BCI table 1b)
HE-BCI Consultancy income with the public and third sector per academic FTE (HE-BCI table 2)

We suggest changing the title to 'engaging with the public and third sector'. Furthermore, we think this should be split as the public sector is very different to the third sector and there is no rationale presented as to the reasons for including them in the same perspective.

Again, there is an overlap with the REF as contract research income would be included in both systems.

The proposed metrics show only a limited snapshot of evidence of working with business and, the context that would be provided by a narrative is essential to understanding the metrics. For example, what was the outcome/impact of the income? What was achieved? Did anything positive happen as a result?

As with the 'research with partners' perspective, there is a risk that using the income metrics suggested will incentivise universities to undertake knowledge exchange only with those public/third sector organisations with the most capacity to provide funding/in-kind support, rather than those which might benefit most.

The metrics for this perspective are entirely based on income per academic FTE. Instead, we suggest the value of knowledge exchange with the public and third sector should be measured in terms of policy advice, professional input/influence, applied research, and potentially also CPD training provided to these organisations. This would require narrative rather than metrics.

Furthermore, it is not appropriate to use income as a proxy for knowledge exchange with the public/third sector when their missions tend to be focussed on societal impact. For example, as we've experienced at BU and is also evident in some of the REF 2014 impact case studies, a small charity can substantially benefit by attending a public engagement event, followed by ongoing knowledge exchange between researchers and the charity which can lead to transformational impacts. This can be achieved with little/no money changing hands. The KEF as proposed does not support or incentivise this type of KE.

Finally, it would be interesting to understand performance in terms of investment not just in academic staff, but the investment made in infrastructure to support KE with the public and third sector.

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):**

HE-BCI CPD/CE income per academic FTE (HE-BCI table 2)
HE-BCI CPD/CE learner days delivered per academic FTE (HE-BCI table 2)
HE-BCI Graduate start-ups rate by student FTE (HE-BCI table 4)

These metrics do not provide any information about the type, quality or reach of the CPD/CE delivered. In addition, what the KEF annual reporting would fail to capture is the often long investment times required for a KEF activity to come to fruition and the flexibility that is

required from organisations benefiting from these activities. Income and days are not directly proportionate in any one year. Hence, it is likely that there will be considerable cross over in reporting and blurring of data if the KEF is undertaken annually.

Again, narratives are essential for understanding activity undertaken in this perspective. For example, narratives should be required to explain the background KE undertaken to generate the CPD/CE, provide information on the quality of the activity, and contextualise the reach and significance of the CPD/CE.

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):**

Regeneration and development income from all sources per academic FTE (HE-BCI table 3)
Additional narrative/contextual information

The KEF, particularly through this perspective, seems to recognise and favour local growth and regeneration, therefore neglecting national and international growth and regeneration. The rationale for this is unclear from the consultation documentation. We suggest that economic contribution more generally is assessed, rather than specifically local economic contribution, or that national and international contributions are explicitly included and assessed.

For example, the BU Disaster Management Centre works in many 'self-defined local areas' in disaster zone regions across the world and is involved in advising on their regeneration both nationally and internationally based on local needs. This type of activity should be eligible for inclusion in this perspective.

In addition to economic contributions, universities make significant contributions to local growth and regeneration in terms of social and environmental impact. For example, supporting integrated healthcare systems to deliver greater benefits to patients who could lead to a healthier local population, however, this form of local growth and development would not be included in this perspective in the KEF.

Furthermore, how is 'local' defined? The consultation documentation suggests this is 'self-defined' (page 10) which seems vague at best. If this is limited to the UK geographical area in which the university is based then how would this work for universities on split, geographically spread out campuses, or those with international campuses? If limited to the local region, then opportunities and resources for universities to contribute to local growth and regeneration are hugely dependent upon geographical specificities and the local political environment of where each university is based. How can metrics provide a meaningful comparison in such a diverse landscape?

IP and commercialisation

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):**

Research resource (income) per spin-out (HE-BCI table 4)
Average external investment per formal spin-out (HE-BCI table 4) Licensing and other IP income as proportion of research income (HE-BCI table 4)

The proposed metrics do not take account of a university's commitment to protect and exploit

IP which would demonstrate positive actions the university is taking to support and enable KE through IP and commercialisation. Instead the focus is again on income and, specific to this perspective, IP that is already generating income.

In many cases, income generation will not be the primary driver of IP exploitation, for example, a university may choose an 'easy access' IP model to get the IP into use quickly to accelerate the realisation of the impact, in line with the Government's Industrial Strategy and in keeping with the ethos of universities as public bodies, often with charitable status.

Also, income does not always accurately reflect the impact of IP. A university may be paid a considerable sum for IP – only for it to be 'locked down' by a commercial partner whilst they commercialise an alternative product.

Although we appreciate that income is measurable, we do not believe that it is adequate as a proxy for impact. For this perspective a narrative about the work that the university is doing to support the development of IP at the university and in business and industry, and IP that has been generated, and its impact, would be more valuable.

Public and community engagement

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):**

Time per academic staff FTE committed to public and community engagement (paid and free) across: Events, Performances, Museums and galleries, (HE-BCI table 5)
• Additional narrative/contextual information

Note there is a separate question to consider the use of supplementary narrative (see below).

We are pleased the KEF includes a breadth of KE activities, including public/community engagement. Although we are pleased that narratives will be used, we strongly believe that they should also be scored/assessed as part of the process.

We believe that there should be more and better metrics as well as narrative to support this perspective. The NCCPE response to the 'KEF metrics call for evidence' (Q3) provides a selection of other metrics that could be considered to provide a more comprehensive view.

Time per academic FTE committed does not provide a measure of high-quality/two-way/meaningful engagement with public/community groups, nor does it demonstrate societal impact. The metric does not capture public/community engagement undertaken by professional and support staff. At BU, we estimate this would omit >30% of our community engagement activity.

We are uncomfortable with the robustness of the 'time spent' metric. Someone could spend all their time on public/community engagement but still be ineffective at KE. How could time be robustly and accurately measured, what activities would be included, how could this be audited? It could result in some universities saying everything they do is public engagement and scoring really highly, with others only using time spent on the delivery of actual events.

If left as proposed, these metrics may drive universities towards large generic events, for example those which attract a large number of visitors without necessarily creating meaningful engagement with the knowledge base or attendees really understanding that they are engaging with a university. Many universities have invested in specialist posts for public/community engagement professionals, as well as capacity building and skills development, to support this important agenda – we suggest this investment is recognised in the KEF as part of an

assessment of the environment.

This perspective should include the measurement of public/community involvement in research projects (not measured in REF, but significant with the rise of zoo-science, crowd-sourcing, and free public participation in data-gathering programmes).

If this perspective remains focussed on academic time, we suggest its title changes to reflect this, for example public engagement with research. What is being measured needs to be clear to non-academic audiences that may use the KEF for decision-making. The supplementary narrative could then include broader aspects of public/community engagement as long as this is made explicit to users of the KEF.

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. [5]

☐	Strongly disagree
☐	Disagree
☐	Somewhat Disagree

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[5] Consultation document – see Annex D, page 24

☐	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 pleased to see the inclusion of a narrative to support the metrics in the public and community engagement perspective, however, we strongly believe the narrative should be assessed as the proposed metrics are so limited. Our understanding of this perspective is that it should be assessing meaningful two-way engagement; if this is correct then more emphasis needs to be given to the narrative around the outcomes and impact of this engagement on the public / community beneficiaries, and the benefit of the university to the region. This can only be achieved if the narrative is included in the assessment.

Without this, there is a risk that universities will undertake more general PR/one way dissemination, rather than meaningful two-way engagement. Ideally, we would like to see a narrative that captures input from engaged public and community partners.

Use of a particular quality mark, could be both restrictive and expensive for institutions - and the process/outcome may not be more beneficial.

As noted on page 21 of the consultation document, it seems that there could be potential for significant overlap in the public / community engagement narrative and the local growth and regeneration narrative.

Local growth and regeneration narrative

Overall, is the guidance on the provision of narrative text for this perspective clear. [6]

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

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[6] Consultation document – see Annex D, page 20

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

(a) where further clarification is required

(b) where refinements could be made

(c) whether there are areas where more consistency across HEIs could be achieved

(400 word limit)

The consultation document proposes that HEIs will be asked to self-define their local area. This would be workable in a KEF structure that was not metrics based and did not place so much emphasis on comparability – a structure for the KEF that we prefer. However, in a structure that is based on metrics and comparability, we do such an approach would not be robust, consistent or fair way, and would undermine the relevance of the KEF outcomes.

We suggest that if the current metrics-based approach to KEF is maintained, a more standardised approach is taken, perhaps based on the ONS definitions which help to define localities.

We also believe universities should be required to articulate how they work in partnership with other anchor organisations, for example, LEPs, local authorities, et cetera, and how they are meeting local growth and regeneration plans, linked to the Industrial Strategy.

Overall we believe the focus on the 'local' is too narrow and that KEF is missing the importance of KE in national and international contexts. The influence and engagement of many universities is much wider than 'local'.

A narrative for this perspective will be important to give context to the metrics and we strongly agree with the inclusion of a narrative in this context. As with the narrative for public and community engagement, we believe the narrative for local growth and regeneration should be assessed.

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:

a. Should the HEI or Research England provide other narrative information?

b. How should we use other contextual information, such as information on local economic competitiveness described in section 5 of the cluster analysis report?

c. Would other perspectives benefit significantly from further narrative information?

d. 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	☐	☐	☐	☐	☐	☒	☐
Overarching institutional statement - provided by Research England	☐	☒	☒	☐	☐	☐	☐

Comments:

a. Should the HEI or Research England provide other narrative information?

We believe that narratives from the HEI are essential, for each perspective and to provide an environmental context including the HEI's strategy and, the local, regional, national and international environments which are relevant to each institution. This will need to be long enough to address the range and variety of approaches across the institution and different subject areas. How should we use other contextual information, such as information on local economic competitiveness described in section 5 of the cluster analysis report?

The KEF should take into account geographical specificities including spatial typology and productivity.

The KEF should take into account the institutional environment to support KE and the institution's strategy in this area.

b. Would other perspectives benefit significantly from further narrative information?

All of the other perspectives should include further narrative information which should be included in the assessment.

This would result in additional work for HEIs, however it is important to provide these narratives to contextualise the metrics, especially if the metrics will be available to an external audience.

A KEF exercise repeated every, say, three years as opposed to annually, would give time to generate narratives, but also time for KE activities to be created and delivered with impact generated and reported to give a bigger picture of the work the HEIs are delivering. Frequent reporting does not reflect that unfolding story.

c. Would the benefit of adding further narrative information be outweighed by the burden of doing so? *

Definitely. We believe it would be more efficient, effective and worthwhile to run the KEF every 3-5 years (rather than annually) and for the exercise to be more comprehensive in terms of submission (for example, including narratives for all perspectives), assessment (for example, peer review of narratives), and presentation of data (for example, contextualised information provided to help non-HEIs interpret and understand the KEF outcomes).

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.	0%
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.	0%

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.	100%
Visualisation is to be delivered through an interactive, online dashboard which will allow exploration of the data underlying the 'headline' results in various ways.	0%

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

a.   where further clarification is required

b.   where refinements could be made

c.   whether there are areas where more consistency across HEIs could be achieved- how narratives could be incorporated?

(400 word limit)

We do not support the proposals for visualisation. As we have noted above, the metrics are generally already available and the proposals to visualise it are too complex. We do not believe that this will provide useful information to external partners or will accurately reflect the range, quality and impact of the KE carried on at UK universities.

If these proposals are adopted, which we would not support, then we do not believe that there should be a single score, we do agree that all perspectives should be equally weighted and that narratives should be published in an easily accessible way.

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)

We understand that by re-using existing metrics there has been an attempt to reduce the burden for institutions. We would support that approach if we believed that the outcome of the KEF process would itself add value to the existing metrics. However, as described above, we do not believe that it does provide enough valuable or usable additional information to justify this process.

11. Any other comments

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

We suggest overlaps with REF are reviewed and excluded where identified. This should avoid double counting or partitioning of income streams.

We strongly advocate reviewing the timing of the KEF – it should not be annual and it should not coincide with the REF (or the TEF, when that moves to a new timetable). It is important to flag the increased burden of this framework for institutions, who will already be reporting data to create the metrics which are then recycled in the KEF, who will often be the same staff who

are supporting the REF. Having this co-incide with the TEF will absorb management time in co-ordinating and overseeing submissions and managing internal and external communications when results are published, particularly as all three systems use such completely different definitions, methodologies, processes and report in such different ways.

As we have noted above, the same external stakeholders – businesses and other organisations – engage in research, in KE, and collaborate with universities on initiatives relating to education. The REF, the TEF and the KEF are all relevant to these stakeholders, but there is a time and opportunity cost for them in attempting to engage with three different and very complex systems. There is a risk that they will ignore them, and continue to engage based on proximity, common interest in specific areas of work, and personal relationships.

Information on the Local Growth & Regeneration proposed narrative content from page 20 – annex D, and the Public & Community Engagement proposed narrative content from page 24 (link)

JANE FORSTER		SARAH CARTER
Policy Advisor		Policy & Public Affairs Officer
66724		65070
Follow: @PolicyBU on Twitter		policy@bournemouth.ac.uk

Appendix 1 - Information from KEF Consultation Document

The consultation document details the proposed design and implementation plan for the first iteration of the Knowledge Exchange Framework (KEF) for English Higher Education Institutions (HEIs). The proposed design is set out in the main body of this document.

In November 2018 Research England published three documents; i) responses received to the earlier call for evidence, ii) the cluster analysis of Higher Education Institutions and a technical note on use of UKRI data in the framework. These documents are available at http://re.ukri.org/knowledge-exchange/knowledge-exchange-framework/ .

Research England are launching the consultation in response to the commission set out in the Government's Industrial Strategy White Paper requesting they develop a Knowledge Exchange Framework, detailed in a November 2017 ministerial letter.
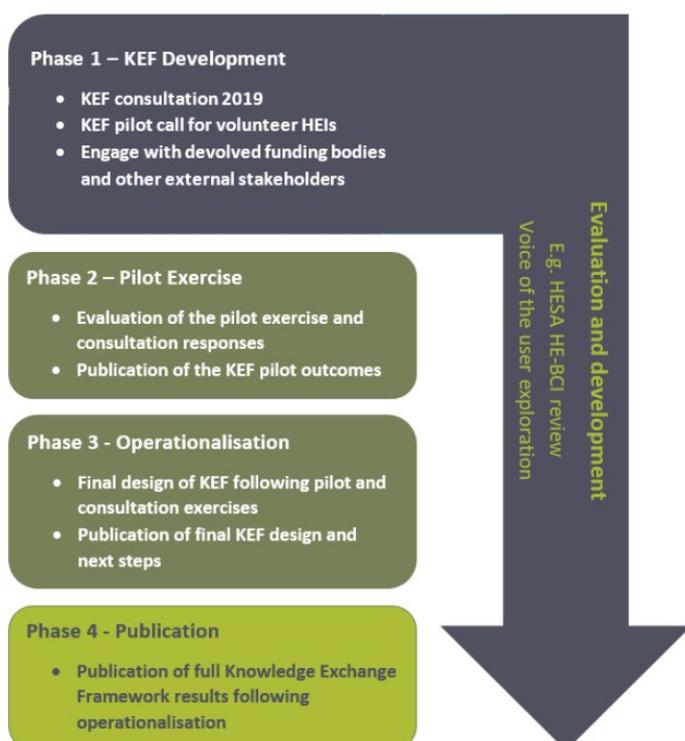
Link to funding

Research England were also asked to advise on an appropriate link to funding. They proposed to the Government they would review a link to funding in the light of an evaluation of the incentives this would give for universities to follow government priorities such as focusing on demonstrable high performance, delivering the Industrial Strategy, and the commitment to reaching an R&D spend of 2.4% of GDP. As such we will revisit this question as part of the evaluation of the pilot exercise. This may then be subject to further consultation.

Implementation

The KEF implementation will take place over four phases, as shown in figure 1. Whilst Research England's remit is England only, as requested in the original commission we will continue to engage with external stakeholders including the devolved funding bodies (to explore the potential for them to utilise the framework if they so choose), the Office for Students and others.

Figure 1 – KEF implementation phases

Phase 1 – KEF Development
- KEF consultation 2019
- KEF pilot call for volunteer HEIs
- Engage with devolved funding bodies and other external stakeholders

Phase 2 – Pilot Exercise
- Evaluation of the pilot exercise and consultation responses
- Publication of the KEF pilot outcomes

Phase 3 - Operationalisation
- Final design of KEF following pilot and consultation exercises
- Publication of final KEF design and next steps

Phase 4 - Publication
- Publication of full Knowledge Exchange Framework results following operationalisation

Evaluation and development
E.g. HESA HE-BCI review
Voice of the user exploration

Appendix 2 - Clusters

http://re.ukri.org/documents/2018/kef-cluster-analysis-report/.

Note: The full report detailing this cluster analysis is available at:
http://re.ukri.org/documents/2018/kef-cluster-analysis-report/.

Cluster name and key characteristics	Membership (short name)
Cluster E Large universities with broad discipline portfolio across both STEM and non-STEM generating a mid-level amount of world leading research across all disciplines. Significant amount of research funded by gov't bodies/hospitals; 9.5% from industry. Large proportion of part-time undergraduate students, and small postgraduate population dominated by taught postgraduates.	• Anglia Ruskin • Aston • Bedfordshire • Bournemouth • Bradford • Brighton • Central Lancs • City University • Coventry • De Montfort • Goldsmiths • Greenwich • Hertfordshire • Huddersfield • Kingston • Lincoln • John Moores • Manchester Met • Middlesex • Northumbria • N'ham Trent • Open • Oxford Brookes • Plymouth • Portsmouth • Salford • Sheffield Hallam • UWE • Westminster

The other cluster groups are detailed from page 15 of this **document**.

Appendix 3- Metrics

Metrics can be viewed from page 18 of this **document**.

Annex C – Metrics and perspectives

This annex sets out the proposed perspectives and metrics to be counted under each perspecti noting where narratives will be used in addition in two perspectives. Normalisation by FTEs or research income is by HESA staff, student and finance records. Normalisation by academic FTE proposed to include both research and teaching staff as recorded by the HESA staff record. **All metrics will be averaged over the most recent three years' data.**

Perspective	Proposed metrics
Research partnerships	• Contribution to collaborative research (cash and in-kind) as proportion of public funding (HE-BCI table 1a) • Co-authorship with non-academic partners as a proportion of total outputs (data provider TBD)
Working with business	• Innovate UK income (KTP and grant) as proportion of research income (Innovate UK) • Contract research income with businesses per academic FTE (HE-BCI table 1b) • Consultancy income with businesses per academic FTE (HE-BCI table 2)
Working with the public and third sector	• HE-BCI contract research income with the public and third sector per academic FTE (HE-BCI table 1b) • HE-BCI Consultancy income with the public and third sector per academic FTE (HE-BCI table 2)
Skills, enterprise and entrepreneurship	• HE-BCI CPD/CE income per academic FTE (HE-BCI table 2) • HE-BCI CPD/CE learner days delivered per academic FTE (HE-BCI table 2) • HE-BCI Graduate start-ups rate by student FTE (HE-BCI table 4)
Local growth and regeneration	• Regeneration and development income from all sources per academic FTE (HE-BCI table 3) • ***Additional narrative/contextual information***
IP and commercialisation	• Research resource (income) per spin-out (HE-BCI table 4) • Average external investment per formal spin-out (HE-BCI table 4) • Licensing and other IP income as proportion of research income (HE-BCI table 4)

Public and community engagement	• Time per academic staff FTE committed to public and community engagement (paid and free) across: • Events • Performances • Museums and galleries (HE-BCI table 5) • ***Additional narrative/contextual information***