Knowledge Exchange Framework (KEF) Consultation 2019

Page 1: Introduction

O1. 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 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.

Page 2: Respondent details

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Representative body

Page 3: Contact details user

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GuildHE

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.

Matthew Guest, matthew.guest@guildhe.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)

We see benefit in the KEF being used as a strategic tool by institutions to identify their strengths and provide an independent benchmark against other similar institutions. The proposed exercise reflects this purpose.

However in its current proposed format this usefulness will be very limited in its scope to achieve objective 2 as it is so academically focused.

The KEF will provide some centralised information for partners and the public more generally; however, it likely to be of most use to those who already work with higher education providers already. The terminology used (including Knowledge Exchange itself) it not well understood by those outside the higher education sector ("partnership" being a more accessible and understood term). This is particularly the case for charities, social enterprise and SMEs.

If KEF's primary purpose is for institutions, then it is likely to work relatively well.

We appreciate that the links to funding are being explored. There are risks associated with doing so based upon the current KEF proposals given that how relatively crude the proposed metrics are, and the decision not to assess or evaluate the narrative statements, which provide more nuanced intelligence. We would argue that if it is to be linked to funding, then some form of light touch review of these narratives would be necessary.

At the same time, linking it to funding would limit its potential as a developmental tool, as HEIs would be less likely to admit any weaknesses of gaps in their provision.

Therefore we are pleased to see that the pilot exercise is considering the link to future funding with a wide range of institutions.

We also support many of the points raised by NCCPE, Social Enterprise Mark CIC and Social Enterprise UK in their submissions to this consultation.

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

Q10. Overall approachThe 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 disagree

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

We appreciate the considerate effort taken by Research England to develop a framework that aims to both make use of existing data and reduce burden on institutions. We recognise that this is version one and that the exercise will develop over the next few months and years.

However the impact of carrying out the exercise may still have strong burden for small and specialist providers. There is limited professional KE staff support due to many providers not receiving HEIF. This puts pressure on the Research office to manage data returns etc. The timing of KEF falls at the same time as REF activity and the HE-BCI review, with returns for all three often managed by the same small team.

Furthermore, until the proposed metrics are operationalised through the pilot it is hard to judge the robustness and usefulness of these metrics or to anticipate other (perhaps unintended) consequences of the proposed approach. For instance, the reliance on metrics may cause an unintentional bias against small and specialist institutions whose KE outcomes are much harder to capture than in simple financial terms, although the clustering does, to an extent help to mitigate against this (see below).

The existing metrics favour particular sorts of KE. Until other metrics capturing (e.g. SROI- although we acknowledge that this is complex and not always appropriate), and some of the ideas around teaching activity in Civic Universities report are developed then the role of narrative is essential.

We feel strongly that as it currently stands the external perspective from HE partners is not currently captured by the KEF and that as well as an over-reliance of the outputs of academic staff, it ignores the input of all other employees as well as 'in kind' contributions. It also focuses heavily on what the university can take out of the community without sufficiently focusing on what the university as a whole contributes as set out for example, in the recent Civic Universities report.

This limited involvement of partners in developing and shaping the KEF is a serious concern. There is a risk that the KEF ends up reflecting what the HE sector thinks is important, not what partners need or value about the sector. We recommend that significant user involvement should be factored into future iterations of the KEF, if the KEF still aims to "provide businesses and other users with more information on universities".

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

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

> We welcome the use of clustering in the KEF, linked to an institution's assets and capabilities for KE, as it makes the task of comparing very different types of institutions more intelligent and fair.

Similarly, the membership of clusters seems broadly correct. We are pleased to see that Research England is paying particular attention to the SSB & STEM specialist clusters.

We welcome the presentation of clusters in that they do not attempt to compare research intensive institutions with low research intensive institutions within the same cluster.

In terms of the variables, we make the following points:

- Scale and focus of the existing knowledge base: we recommend that a metric on professional staff should be included. Institutions with a higher number of KE professionals may be more efficient and effective in engaging in KE activity. The literature makes it clear that these professional roles are a critical factor in delivering effective knowledge exchange.

Many universities invest significantly in these roles (often through HEIF) to deliver their KE strategies. There is blatant inequity of trying to compare those HEIs with a HEIF allocation and those without. HEIF is a fundamental enabler particularly for those in the lower HEIF thresholds. We would expect to see the number of such roles and their key functions being reflected in the variables and that due consideration is taken when providers do not receive HEIF.

- Scale and focus of knowledge generation: Given the arguments expressed on page 9 of the cluster report that comment on different types of research, the focus on 4* publications rather than 3*/4* impact case studies will not capture the full scale of knowledge generation within an institution. Given that the quality of impact achieved by HEIs is critically linked to their KE capabilities we are keen to understand why this was not incorporated into the methodology, and whether including it would have any impact on the clusters.
- Innovate UK grants should also be included as a variable.

Some further consideration is needed around clusters and local geography. Providers operate in different parts of the country that have different economies. Some small and specialists are clustered with larger providers who have more resources (eg HEIF, Research Council Impact Accelerators). Yet smaller providers are doing locally relevant KE and ignoring this in favour of country-wide income driven metrics risks disrupting valuable work. The KEF should take account of this by offering a geographical lens.

O14. 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

Listed above and wish to provide further comment

Page 9: Proposed SSB & Cluster feedback

Q15. 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)

We welcome Research England's ask for feedback for the SSB & STEM Clusters and we have encouraged our members to respond individually to this point.

We also welcome the fact that institutions can move clusters where there is a good argument to do so and that the clustering model is likely to be re-run periodically every 5 to 6 years.

Page 10: Perspectives and metrics

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:

The seven perspectives provide a helpful categorisation of different types of KE activity, with some provisos noted below. They build sensibly on the existing literature about different categories / purposes of knowledge exchange. We agree that all seven perspectives should receive equal weighting. Their function is to capture the broad range of KE activities being undertaken. Weighting them equally will encourage a broad and balanced portfolio of KE activities across the sector. However, given government's interest in supporting scale up and SMEs, we recommend that an explicit perspective on SME support and engagement is added. This could include some of the data already collected by HE-BCI. Furthermore, greater account of social enterprise should be considered (we refer to evidence submitted by Social Enterprise Mark CIC and Social Enterprise UK). Many of the perspectives are cross cutting and social enterprise activity and support does not have an obvious home - activity may be covered under both business and working with the public and third sector. We believe that a perspective should be added on how higher education providers work with each other in the KE (eg through networks to develop best practice). Developing such collaborations and partnerships makes a critical contribution to the overall impact of the sector's KE performance, and the vitality of the KE system. It would be useful therefore if the KEF were able to capture and foreground this. This could include and HEI working with other a non-eligible education institution (eg FE College and also APs) Partnerships with other educators should also be captured, such as where institutions support and/or sponsor schools. We refer to the Civic Universities report which provides examples of how smaller providers are making positive contributions in this space. Whilst we appreciate that this is KEF 1.0, metrics for future iterations of the KEF must move beyond being wholly based on a provider's research base. Please see our "other Comments" for further detail.

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.

Research partnerships50% supportWorking with business75% supportWorking with the public and third sector25% supportSkills, enterprise and entrepreneurship70% supportLocal growth and regeneration50% supportIP and commercialisation90% supportPublic and community engagement25% 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)

The metrics in this section broadly feel right if this is a measure of income only.

However such metrics naturally favours the very limited number of institutions that receive Research Council Funding.

The label "research partnerships" suggests a broader range of partnerships than the public ones captures here. For example, it implies charitable and business research partnerships. Yet business and nonprofit research are captured under different perspectives.

As a lot of the information that this perspective captures goes towards the conceptual framework that underpins the clusters (eg Research Council grants), it does not reveal as much about KE and could be a form of double-counting. This perspective could be replaced by one of the others that we suggest.

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)

The introduction of Innovate UK streams here is a positive addition.

However, capturing the number of KTPs and grants would be useful - some institutions may be carrying out lots of smaller projects with business rather than large projects, particularly in areas of the UK that have lots of smaller businesses.

If a separate perspective on SME / micro engagement is not included, then a specific narrative element within this perspective should be included here.

Facilities, such as innovation spaces/hubs and university equipment (eg access to 3D printers for local makers) that are open to businesses also play a role in KE. This could also be captured in a short narrative section.

There is also a range of activities that result in KE but come from a teaching perspective. The exchange is two way, with employers/ businesses getting as much out of the process as the learner. For example:

- Businesses people mentoring students and employers engaged with teaching and supporting students more widely
- Student placements and wider staff/student volunteering with local businesses
- Work-based learning for employers in employment

We also agree with Social Enterprise UK and Social Enterprise Mark that data on procurement from local businesses and social enterprises on the basis of social and environmental value could be included here or under the Local and Regional Growth section (eg a figure for the "% of procurement spend which is influenced by social value").

Business accreditations (such as the Social Enterprise Mark and Social Enterprise Gold Mark) Awards could be included here too.

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)

Limiting these measures to contract and consultancy income metrics, limits the scope of work in this area severely. In most cases universities see themselves as partners and contributors to the local community as has been outlined in the UUP Civic Universities Commission Report. The metrics used in this perspective should be elaborated.

Many academics (and professional) staff carry out pro-bono or low-bono work with charities and others.

Similar to our point on business, capturing the number of interactions rather than just income would be useful. For example, data on co-produced, collaborative research.

Some courses include placements with charities and public sector organisations - the KEF could draw on teaching data on this as students impart knowledge through such placements.

For example, many of our members offer work-based learning in undergraduate and taught postgraduate courses who study part-time either on campus or at a distance with their employer. Many industry professionals contribute to provision as industry scholarship providers, curriculum advisors, guest lecturers and panellists.

There are further examples in GuildHE's Practice-Informed Learning report.

Furthermore, staff and students volunteer for charitable organisations, often using knowledge gained or developed at the institution (e.g. as trustees). This data may not work for the first iteration of KEF but should be considered for future versions.

This section in particular would benefit from a narrative element.

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)

This perspective has a lot in it - skills development activity and enterprise is not limited to start-ups and income.

Information on social enterprise spin-outs could be captured explicitly (HE-BCI table 4). There is no facility in the proposed metrics to consider the social impact of enterprise creation (both social and generic). One of the weaknesses of the current system is that it often focuses on high tech and STEM related enterprises which are often biased towards a certain type of student ignoring some of the softer skills that relate to enterprise development that aims to tackle social issues.

Metrics on whether there are student enterprise societies could be captured here as they could be indicative of future graduate potential.

The contribution of 'non-academic' staff to HEI CPD provision should also be captured.

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.

We agree that additional narrative would be useful here; however, we also think that other data could be collected to help strengthen the perspective.

The numbers of staff engaged with LEP/local council (e.g. chair of committee) could also be gathered here.

The make up of institutions' governing bodies from the local area could be included as an indicator of involvement in local agendas.

Support for local community initiatives and networks eg Social Enterprise City and social enterprise networks

Leadership in addressing local regeneration in deprived communities eg Plymouth College of Art (PCA) has a commitment to place making and place based regeneration and invests heavily in the city and their students.

As we have already highlighted, local context and geography matters. There are not as many large companies in many parts of the country (eg Cumbria or Cornwall) and so most local regeneration work will happen with SMEs. Outside of European Development Funding, income towards local growth is currently limited.

Universities often spend money in to support their regions, which could be a better indicator of impact rather than income. For example, the University of Worcester co-invested with the local council in a new public library which has seen a huge increase in use (see the Civil Universities report for further examples).

Future versions of the KEF will need to consider how activity related to Local Industrial Strategies and the UK Shared Prosperity Fund are captured.

Data on locally focused research initiatives aimed at solving local problems, or national/global problems at a local level, could be captured here, especially if the output is not a 4* journal article.

We also cross-reference our response here to the Social Enterprise Mark

> Q23. 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)

The data collection proposed in this section feels correct although there should not be whole emphasis on income and investment as some social enterprises can become 'spin outs' - so social impact metrics or comments should be included if appropriate.

Q24. 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) Note there is a separate question to consider the use of supplementary narrative.

We agree with many of the points made by the NCCPE and cross-reference their response here.

We agree that additional narrative would be useful here; however, we also think that other data could be collected to help strengthen the perspective.

Similar to NCCPE, we have reservations about the proposed metric (time per academic FTE committed to events, performances and museums and galleries):

- These types of activities represent just a subset of the many types of public and community engagement which we would want to see reflected in the framework. For many HEIs these kinds of dissemination activities are just the 'tip of the iceberg', and don't capture more interactive and collaborative types of activity
- The inclusion of events in museums (which need to be 'owned by the HEP') could unfairly bias the framework in favour of the relatively small number of HEIs who own their own museums

We encourage Research England to explore NCCPE's proposal that HEIs could be invited to selfassess against four indicators on a scale of one to four (where 1 is not in place; and 4 is fully realised). Their overall 'score'/metric would be the average of their assessments of their progress against the indicators. They are:

- Providing community access to your facilities and expertise.
- Involving communities in your research and teaching
- Commitment to partnership working and social responsibility
- Working to the highest professional standards

Some other measures that could be included are:

- The number of times that university assets are opened up to community.
- University investment in brokerage should be included. The Civic Universities report highlights this
- Public involvement in research advisory groups; other investment could be included.

There is also a case to use some metrics (often collected by PR and marketing departments) to inform this perspective:

- The number of academics/professional staff blogging on external sites (eg The Conversation) (and associated website hits)
- Social media interactions (eg interactions with institutional Research or KE channels not just followers or the main institutional account)
- Media appearances by academics, coverage of research/KE (this of course could crossover with REF impact case studies; however, to inform this perspective the focus would be on the institution more generally rather than specific pieces of research).

Page 11: Supplementary narrative

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.

Somewhat agree

O27. Please comment on the proposal to include narrative from HEIs for the public and community engagement perspective, in particular: - where further clarification is requiredwhere refinements could be made- whether there are areas where more consistency across HEIs could be achieved (400 word limit)

Our comments here should be read in conjunction with recommendations made by the NCCPE and the Social Enterprise Mark CIC. Our comments are further to potential options developed by both organisations.

We agree that a narrative element would be beneficial here. We also agree that a maximum length of two sides of A4 is correct.

We would guestion how this information is to be used and challenge the assumption that there should not be some form of objective assessment. As we have already commented, the KEF purpose that is most clearly being fulfilled is the aim to provide UKRI and "HEIs with a useful source of information and data on their KE activities".

If business and the wider public are to use the narratives in particular then we would question whether the language used will work. For example, talking about "targeted knowledge exchange activity" is likely to result in very HE specific language and acronyms that may not be understood by those outside of HE. Questions such as "How do you work with your local community? What are the results?" may work better.

Furthermore, whilst this narrative section is useful to expand upon activities, it runs the risk of becoming a purely "good news" narrative rather than an honest assessment of an institution's work in this area.

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

Somewhat 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)

Our comments here should be read in conjunction with recommendations made by the NCCPE and the Social Enterprise Mark CIC. Our comments are further to potential options developed by both organisations.

We would make the same overall comments for this section as for the previous section on "public and community engagement."

> 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
Overarching institutional statement - provided by the HEI					X		
Overarching institutional statement - provided by Research England						X	

Comments:

Narrative information We could see the benefit of Research England providing a narrative section for each of the clusters. This could provide an overview of the strengths of each cluster and provide a clear way for those outside the sector to gain an appreciation of the diversity of potential partners. A brief HEI statement would be useful, just as the TEF requires a provider statement, and the REF an Environment return. This kind of background information is critically important. It provides useful contextual information, which would be of value to users of the KEF to help them understand the priorities, resources and infrastructure to support KE that is available within different HEIs and would help them to navigate the data presented for the 7 perspectives. It also helps to ensure that the KEF focuses attention not just on the 'ends' but the 'means' by which the outcomes have been achieved: the internal structures and capabilities to support KE (for example, KE offices) and the overarching strategic intent and context which would allow users of the KEF to interpret their results intelligently. The narrative should also focus attention on evidence how KE activity is realising institutional benefits: outcomes and impacts that are internal to institutions, which include contributions to delivery of core missions of teaching and research, and the development of staff and student capabilities to do KE. Such benefits were clearly signposted in 'The state of the English university knowledge exchange landscape' (p.20). It is important that these are reflected in the KEF as they are a critical dimension to the overall KE system, and focusing only on external benefits risks distorting the picture. While there is an argument that producing such a narrative would duplicate information already shared in the REF Environment statement, these REF returns are only produced every 6 or so years, and so would quickly become out of date. Other perspectives that would benefit from narrative information We have highlighted a couple of other perspectives that may benefit from narrative information earlier in our response.

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.)

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)

The top level visualisations are good at showing cluster and individual institutional strengths.

The provider dashboard means is good at demonstrating how each perspective has an equal weighting, something that a bar graph (for example) would do as well due to the order that perspectives would be listed in.

To a partner or potential partner from outside the HE sector, this could be the most useful information.

The drilled down perspective level is likely to be of greater interest to HEIs as it is fairly detailed information.

It should be made clear to users that low scores relate to an absence of activity rather than activity of a poor quality. This will allow non-university users to identify opportunities for developing relationships in an underexplored space, as well as universities who may have more demonstrable experience.

It is quite difficult to see how the narratives (if they are two A4 sides) can be easily included in the visualisation. Potentially, the cluster description section on the left of the page could be adapted to present some narrative information.

Page 13: Implementation

> O33. 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 believe that the timeline proposed to implement the KEF is promising. We welcome the pilot exercise and the efforts made to engage with small and specialist institutions so far in the process.

As already mentioned, one aspect to keep in mind is the limited capacity that smaller institutions have in supporting and reporting on KE activities. KE staff often also have research support roles. For this reason, implementing the KEF could place increased pressure on smaller institutions during the REF return period and at the same time as the recently announced HE-BCI review.

Page 14: Any other comments

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

HEIF & HEBCI

Whilst we appreciate that Research England view HEIF as an enabler of KE rather than a building bloc, we believe that it is a crucial component for the delivery of KE activities. It is important that Research England monitors closely whether institutions that receive HEIF have stronger metrics in the KEF than those that do not.

- Those without HEIF do engage with KE but with no extra funding so they must be compared/benchmarked as like for like, not with a big HEI that had been receiving HEIF funds for years - the only reason they do not get HEIF is size and consequent scale of activity and not any inability to do it.

Unless the lower HEIF threshold is removed, and, as HEBCI informs both KEF and HEIF, we warn strongly against linking HEIF to KEF as this could simply reinforce the status quo, reduce diversity and mean the current winners keep winning in the same parts of the country.

OfS shared duty on KE

Many small and specialists undertake high-quality, practice-leading activities (eg CDPs/consultancy) that are based upon translational research and/or practitioner/teacher crossover but do not come out of a traditional research base yet are clearly examples of knowledge exchange. They operate in the space between research and teaching.

Please examples in GuildHE's Practice-Informed Learning Report (2018).

KEF 2.0 must adopt metrics that capture this activity as such providers carry out work that is essential to support Industrial Strategy Goals (for example in the creative industries).

Given the shared duty with the OfS on knowledge exchange, Research England must work with OfS to ensure that KEF 2.0 makes the most of recognising and enabling new (approved fee cap) providers to continue to develop excellent, non-traditional forms of knowledge exchange.

We look forward to working with Research England, OfS and BEIS on the link between KEF and HEIF (and other funds) to develop a KE system that drives benefit from the full range of higher education providers.