



Universities Scotland response to Knowledge Exchange Framework 2019

March 2019

Knowledge Exchange Framework (KEF) purpose

Question 4: 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.**

We are not persuaded that the KEF, as presented, will help businesses or other potential partners to make decisions about working with universities. We would be interested to understand the potential user view on this.

Whether or not the KEF is linked to funding it could be an important for the reputations of HEIs and we would be concerned that it would be easy to generate a single score and that this could be inappropriately used (for league tables) or interpreted (without contextual information). We are not sure how the KEF would facilitate institutions ability to learn from one another, understand effective practice across the sector in order to improve performance.

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

Question 5: 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?

Whilst we appreciate attempts to minimise reporting burden the weight of opinion from Scottish HEIs is to encourage Research England to allow contextual information for the KEF metrics. We are unclear what the link to the KEF Concordat may be and alignment could be a useful way of bridging this gap. From a Scottish perspective there is considerable narrative reporting via the Universities Innovation Fund which may provide appropriate information to contextualise any metrics, should Scottish HEIs be included.



Regarding the metrics we have heard concerns that attempting to capture the full spectrum of knowledge exchange with relatively few metrics will necessarily give a limited view. Further, there is a risk of ‘double counting’ (or double credit) between the REF and KEF, particularly should the KEF be linked to funding in future.

Clustering

Question 6: 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. What are your views on this approach?

We are disappointed that the clusters no longer take into account the economic context of HEIs, for instance, the R&D investment of businesses in the local ecosystem. This was attempted in the technical guidance and would be valuable to address place as an important factor for knowledge exchange.

Should this approach be extended to Scotland we would see some value in factoring in the input. As underpinning knowledge exchange funding (HEIF) grows in England but not in devolved nations we see it as important to take this into account for fair comparison. We see a need to have a relatively fluid approach to assignment to clusters so institutions might move between clusters to reflect the changing circumstances of a HEI.

Perspective and metrics

Question 7: 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:

- **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?

We have previously flagged our concerns about different interpretations across the UK sector in reporting to HEBCI which could skew the results. We have concerns about the robustness of HEBCI data and the reliance of the KEF metrics approach on this data.

We are aware that HESA will shortly be reviewing HEBCI. We welcome this review but note that this could alter the metrics underpinning the KEF approach (whether through changing or tightening definitions or introducing new metrics). This would also impact on the plans for using three-year averages. It is therefore challenging to comment fully on the metrics identified.

We see it as very ambitious to try and capture the full range of knowledge exchange, as articulated in this consultation document, with under 20 existing metrics.

Finally, we were surprised to see that Research England used principles underpinning their metrics selection that do not reflect the principles identified by the Forum for Responsible Metrics.

Visualisation

Question 9: 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?**

We have concerns about the visualisation of the metrics in respect of the usefulness in meeting the objectives of the KEF and the risk of data being used to generate league tables.

There is a risk that not being 'above average' will be interpreted as 'bad'. We think this speaks to the importance of contextual information so HEIs can explain their context and mission. It will also be important that the limitations of the KEF metrics approach are clearly explained so that the metrics are interpreted by external audiences appropriately.



Implementation

Question 10: Please provide any comments about the implementation of the KEF.

We are unclear how KEF metrics and the KEF Concordat sit together. Our understanding from Research England's materials is that metrics and Concordat are two parts of the same Framework so it will be valuable to understand how these are intended to interact.

From the devolved nation perspective we are interested in the implementation and pleased that a Scottish HEI is involved in shadow form, along with engagement by our Funding Council.

Further comments

Question 11: Please share any additional comments.

While no Scottish universities are currently required to be 'in' the KEF we have a number of concerns with this approach. Due to the accessibility of HEBCI data and the relatively low number of metrics involved we consider it would be easy for Scottish HEIs to be pulled into the KEF and any rankings. It will be simple to create league tables from the data as presented, even though this is not Research England's intention. We do not think such a simplistic interpretation of the data would support the aims of the KEF, nonetheless, this is a risk and possible unintended consequence of the KEF.

