

Summary of responses to the consultation on Research England Terms and Conditions of Grant 2023-24

1. We have updated the terms and conditions (T&Cs) for Research England (RE) funding to apply from August 2023. The terms and conditions have been updated to reflect new policy changes in line with UKRI, OfS and national policy, where applicable, and to ensure continued accountability for Research England funding beyond 31 July 2023.
2. The purpose of our terms and conditions of funding is to provide clarity and assurance around the formal funding relationship between UKRI (operating through Research England), governing bodies and heads of providers.
3. In updating these terms and conditions we have continued to focus on two key principles:
 - a. **Complementarity**: replicating similar frameworks operated by other bodies and utilising existing sources of assurance where possible
 - b. **Continuity**: avoiding unnecessary major changes in the relationship between Research England and the providers it funds
4. UK Research and Innovation regularly reviews its terms and conditions. We will strive to ensure that where our aims are the same as those of the rest of UKRI we do not generate additional conditions. Increasingly, the Research England conditions will focus specifically on areas where our distinctive model of assurance is fundamental to what we do, cross-referring to other documents where we share interests with others.
5. Research England's purpose is to create and sustain the conditions for a healthy, dynamic, diverse and inclusive research and knowledge exchange system in English universities. Our role is in securing flexibility for universities and colleges to make their own judgements and take risks. We are responsible for the element of dual funding which protects the capacity of universities to respond quickly to opportunities central policymakers may not even be aware of and our approaches to funding will ensure that we do that. We are also responsible for ensuring that the research system across our universities is capable of sustaining its level of achievement. We will diverge from other existing accountability frameworks only in order to achieve these goals.
6. Through the Higher Education and Research Act 2017, we are required to consult on changes to our terms and conditions. A consultation on the substantive amendments and additions included in the 2023-24 revision was conducted during May and June 2023. These amendments formed the basis of three questions in a consultation survey. The

survey was circulated to all higher education providers who are in receipt of Research England funding and also to sector representative bodies UUK and GuildHE, in line with the section of the terms and conditions (paragraphs 87-89) which describes how we will approach revisions to the terms and conditions.

7. We welcome the feedback received and have taken this on board. The following summary captures the key themes from the consultation feedback, along with our responses to those themes, including providing additional clarity where it was sought and identifying where we have amended our proposed changes. We will also incorporate the feedback into the development of future versions of our terms and conditions.

Summary of responses

Question 1 – Clarifying eligibility criteria

8. Question 1 from June 2023 [Research England Terms & Conditions consultation](#)

“The consultation document sets out the substantive amendments and additions to the 2023-24 terms and conditions compared to the 2022-23 version. These include:

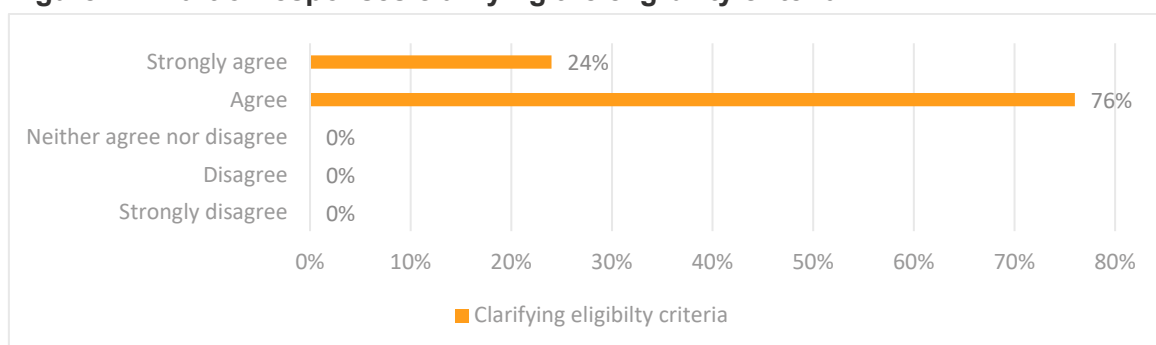
- *Changing the name of Annex A to remove the word ‘competitive’. Annex A describes the standard conditions in relation to funding which is not allocated by formula, i.e. all project funding, not only competitive funding;*
- *The eligibility criteria for a provider to be eligible for grant funding from Research England (subject to additional scheme-specific criteria).*

It should be noted that these amendments do not change the overarching eligibility criteria for Research England funding as described in the terms and conditions. We have made these changes to clarify what might previously have been perceived as ambiguous or inaccurate wording.

Do you agree with this approach?”

Consultation responses:

Figure 1: Chart of responses clarifying the eligibility criteria



9. Respondents agreed with the proposed changes to the eligibility criteria and considered that they did provide additional clarity. There was also support for the use of the term 'non-formula and project funding' in place of 'competitive' and 'competitively allocated funding' in both the title and body of Annex A.
10. However, beyond the proposed changes, there were questions on the existing wording: "The principal – though not necessarily exclusive - aim of the provider's research activity should be the creation of new knowledge which is made freely available to all". Some respondents queried if this suggested that providers must put all their research into open access.

Research England's reply:

11. The statement that the "principal – though not necessarily exclusive – aim of the provider's research activity should be the creation of new knowledge which is made freely available to all" is existing wording which was already included in the terms and conditions prior to this consultation, therefore it is not a new requirement for 2024-25. Nor is it in relation to the UKRI open access policy. Rather, it relates to the principle that Research England funding is intended to support those who meet the regulatory requirements of OfS registered approved (fee cap) providers, typically English universities and higher education providers, rather than entities who may seek to undertake research for solely internal purposes. We will seek to further clarify this statement in future iterations of the terms and conditions.

Question 2 – Eligibility for KE funding

12. Question 2 from June 2023 [Research England Terms & Conditions consultation](#)

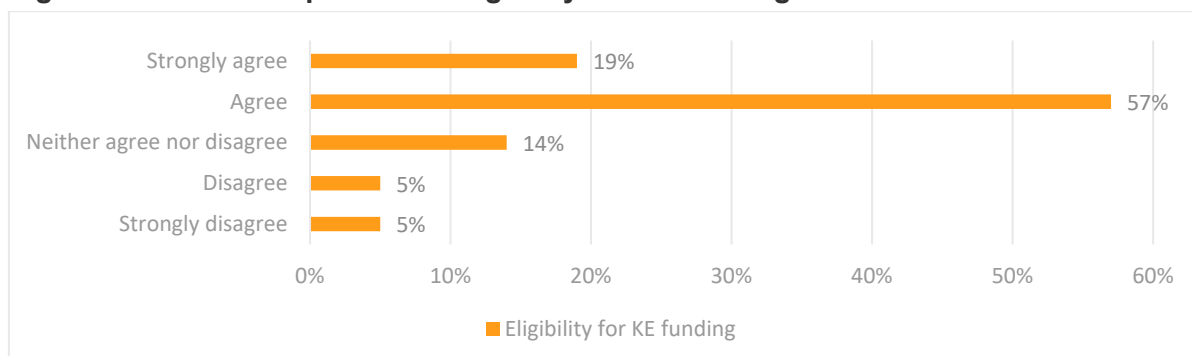
"In clarifying the wording on the eligibility criteria to receive Research England funding, we have sought to enhance this by separately presenting specific eligibility criteria for KE funding, including Higher Education Innovation Funding (HEIF).

In doing so we will publish an explainer document on Knowledge Exchange funding eligibility (including HEIF) '[Statement of eligibility for KE funding](#)'.

Comments and views on the statement of eligibility for KE funding are welcomed."

Consultation responses:

Figure 2: Chart of responses to eligibility for KE funding



13. As shown in figure 2, the majority of respondents (76%) agreed or strongly agreed with the approach to present specific eligibility criteria for KE funding. In addition to the clear level of agreement displayed, the accompanying comments particularly welcomed the clarity the [Statement for eligibility for KE funding](#) will bring to the process.
14. Two comments related to the minimum level of activity, with one considering that the criteria standard was too high and would adversely impact the ability of small and specialist providers particularly to gain eligibility, while another felt the level was too low.
15. Several respondents made related comments respect of the Higher Education Research Act (HERA) 2017 definition of knowledge exchange and the availability of data, specifically expressing concern about how these related to the arts and humanities.

Research England's reply:

16. We note the clear support for the proposed [statement of eligibility for knowledge exchange funding](#) and we will proceed to implement the criteria set out in the consultation in spring 2024 for the 2024-25 allocation process. This will include consideration of requests made through the consultation to publish sector averages for previous years.
17. We set out in our recent [Strategic Delivery Plan](#) our intention to develop our national capability to be a centre for KE and impact evidence, metrics and data for the long term, whilst continuing to participate in HESA's current review of the HE-BCI survey. The work on the centre will include consideration of appropriate breadth of metrics, taking account of points made about data relating to the arts and humanities.

Question 3 – Aligning with applicable regulatory changes

18. Question 3 from June 2023 [Research England Terms & Conditions consultation](#)

“The updates we make to our terms and conditions are intended to reflect relevant policy developments in UKRI or nationally; employment and sector good practice; regulatory change; or any relevant policy developments as may be notified separately by Research England. In developing these terms and conditions we continue to focus on two key principles:

Complementarity: replicating similar frameworks operated by other bodies and utilising existing sources of assurance where possible

Continuity: avoiding unnecessary major changes in the relationship between Research England and the providers it funds

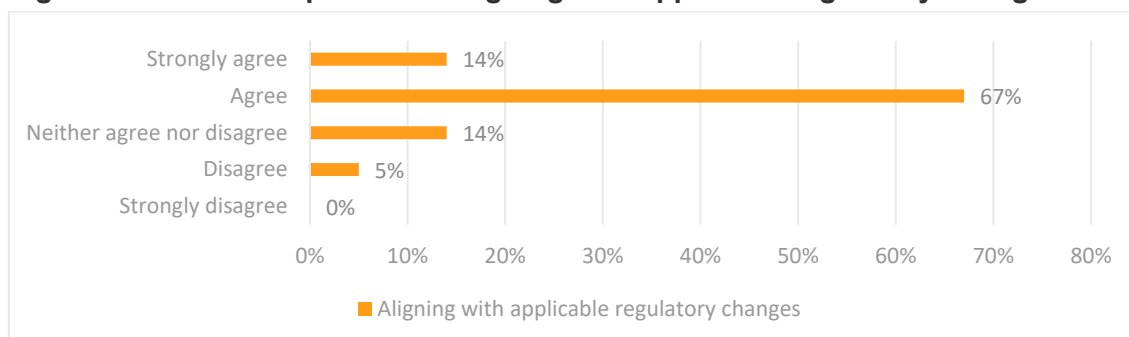
Therefore, we have further aligned our terms and conditions to reflect our expectations of HEPs to conduct an internal audit of the data they provide to us; and to reflect changes to the way in which the Office for Students regulates quality in England since the 31st March 2023.

These changes are not intended to add to our requirements of providers, but to provide clarity around our expectations.

Do you agree with this approach?”

Consultation responses:

Figure 2: Chart of responses to aligning with applicable regulatory changes



19. Most respondents recognised that the clarification regarding data assurance aims to establish clear expectations, but several expressed concern that it also introduced a requirement for a comprehensive auditing review every five years, which might be regarded as disproportionate or resource intensive, particularly for small or specialist institutions.

20. Conversely, others considered that, on balance, the expectation for internal audit approximately every five years did seem proportionate.

21. Few respondents commented on the proposed removal of the reference to the QAA Quality Code for Higher Education, in recognition of the way in which quality is regulated



in England by the OfS since the 31 March 2023. Those who did comment agreed with the proposal.

Research England's reply:

22. The expectation of HEPs to “undertake an internal audit review of the data approximately every 5 years, along with a review of the systems and processes used for the compilation of the data” references the data which RE uses from providers’ OfS returns, HESA data and HEBCI data, for example. The expectation is that most providers will already conduct some sort of review or internal audit on their data, and we already expect to see evidence of that in our assurance process, therefore it is not a new requirement. By including this expectation in our terms and conditions, we are seeking to clarify that expectation in advance. We will not seek to inform providers how they should conduct any such audit; rather the expectation is that providers will be able to evidence, if required, that they are able to assure themselves, in a proportionate manner, that their processes are robust and that their data is accurate.