



Department for Business, Innovation & Skills

Fulfilling our Potential: Teaching Excellence, Social Mobility and Student Choice - Consultation

You can reply to this consultation online at:

<https://bisgovuk.citizenspace.com/he/fulfilling-our-potential>

A copy of this response form is available at:

<https://www.gov.uk/government/consultations/higher-education-teaching-excellence-social-mobility-and-student-choice>

The Department may, in accordance with the Code of Practice on Access to Government Information, make available, on public request, individual responses.

The closing date for this consultation is 15/01/2016

Name: *Professor Ken Brown, Vice President*
Professor Alice Rogers, Education Secretary
Organisation (if applicable): *London Mathematical Society (LMS)*
Address: *The London Mathematical Society*
De Morgan House,
57-58 Russell Square
London WC1B 4HS

Email Address: education@lms.ac.uk

The London Mathematical Society (LMS), founded in 1865, is the UK's learned society for mathematics. The Society's main activities include publishing journals and books, providing grants to support mathematics and organising scientific meetings and lectures. The Society is also involved in policy and strategic work to support mathematics and the mathematics research community. This work includes engaging with government and policymakers on mathematics education and research, participating in international mathematical initiatives and promoting the discipline.

Please return completed forms to:
Alison Haines
Higher Education Directorate
Department for Business, Innovation and Skills
Level 1, 2 St Paul's Place
125 Norfolk Street
Sheffield
S1 2FJ

email: consultation.he@bis.gsi.gov.uk

Please tick the box that best describes you as a respondent to this consultation.

	Alternative higher education provider (with designated courses)
	Alternative higher education provider (no designated courses)
	Awarding organisation
	Business/Employer
	Central government
	Charity or social enterprise
	Further Education College
	Higher Education Institution
	Individual (Please describe any particular relevant interest; parent, student, teaching staff etc.)
	Legal representative
	Local Government
	Professional Body
	Representative Body
	Research Council
	Trade union or staff association
✓	Other <i>Learned Society</i>

PREAMBLE

The London Mathematical Society, as a leading UK learned society, welcomes the intention to support teaching in higher education which the issuing of this Green Paper and the associated consultation is presumably intended to convey, but regrets that, without a significant change of direction from many of the policies suggested in the Green Paper, the effect will be damaging rather than improving.

We are seriously alarmed at the prospect of a poorly thought out TEF being rushed into in a heedless manner, with scant opportunity for constructing a valid methodology. The difficulties of constructing a TEF are enormous. We

regret that the Green Paper falls far short of what is required. It is clear that much more time, resource and expertise are required before any TEF can be launched.

On the TEF, our principal recommendation is that the TEF procedure be put on hold until time, resource and expertise have been brought to bear and proposals developed which have some prospect of recognising existing strength and encouraging improvement.

On Widening Participation, our principal recommendation is that it is not coupled with any TEF, and that Widening Participation activity addresses differing levels of participation in specific disciplines, including in particular Mathematics.

Before answering individual questions, we give (A) some general reflections about universities and (B) some comments on the Green Paper.

A1. Universities have evolved over centuries as institutions that train professionals, preserve and develop scholarship, question philosophical and political assumptions and inspire and conduct research. Any major appraisal of activity such as that in the Green Paper needs to have this broad vision in mind.

A2. Teaching and research should not be seen as two mutually exclusive, competing activities. Researchers teach and teachers carry out research and scholarship, the same intellectual fire lighting all these activities; it is important that the dual funding model enables this. The balance between teaching and research will vary between individuals in a university. A key role for any TEF will be to ensure proper reward and recognition for excellent teachers, and that there are opportunities for career progression for those whose dominant activity is teaching.

A3. University teaching is important to society in handing on the torch of knowledge to successive generations, and in ensuring that individuals are equipped to work as professionals in traditional fields such as law and medicine as well as newer ones such as computer science and engineering. It also must ensure that those who play a leading role in public life have a historical and social perspective to inform any power they wield.

A4. University teaching thus has a utilitarian role, in a broad sense. The manner in which it is carried out affects not just what students learn but also their attitude to intellectual procedures, their ability to work autonomously and to develop and adapt after the end of their formal studies.

A5. Obviously the benefit of a university education does not simply accrue to the person who receives it, there are also wider, collective benefits to society and the economy.

B The consultation

We reiterate that we welcome importance being attached to teaching. We believe that the commitment of UK universities to teaching, and to their students, is generally high, often beyond the level that might be expected given levels of funding. We regard it as essential that any TEF developed is able to recognise and reward good teaching and encourage improvement by encouraging reflection and sharing of good practice, rather than introducing mistrustful accountability, punishment and competition between institutions.

B1. We would like to offer our services to the attempt to develop a TEF that is effective and valid, particularly for the mathematical sciences disciplines. We believe that developing such a TEF could be valuable, but that it is a difficult task.

B2. A bad TEF is worse than no TEF. We call on you to delay the process and allow sufficient time for proper development, piloting and discipline-level procedures.

B3 Certain assumptions with which we do not agree seem implicit in this consultation. In particular, the ‘marketisation’ assumption that the prospect of a higher monetary value will improve outcomes pervades most of the content of the Green Paper. It conveys the impression that education is simply a commodity to be traded, whereas the reality is of course much more complex.

B4. The value of university education does not simply accrue to the student who receives it, and its financial value can vary between individuals even when they take the same course and have the same degree of success. Any consideration of cost should also consider the input in time and effort by the student.

B5. Over recent decades the student/staff ratio in UK universities has increased considerably. This has obvious consequences, and suggests that to improve such elements as contact hours and class size the absolute level of funding needs reconsideration, as well as its source.

B6. We do not believe that ‘success’ in any TEF should lead to higher fees. Rewards should be by direct funding to departments, as with the REF.

B7. The questions do not address the substantive issue of teaching quality. The proxies suggested, such as the NSS, and measures of outcome, are not calibrated or validated. That immediate student satisfaction may not correlate with longer term outcomes seems to be overlooked. (For evidence see the paper of Carrell and West. ¹)

B8. Student opinion is of course important, and has been sought for many years at various levels, including the teaching of individual modules. But

¹ <http://faculty.econ.ucdavis.edu/faculty/scarrell/profqual2.pdf>

there is a tension between pleasing students and the authority of a teacher to deliver what they judge to be appropriate; such content may be challenging, and make the learning process uncomfortable.

B9. The Green Paper asks for consistent degree classes across the sector, without any recognition of the issues this might involve, or processes which might be needed for contextual adjustment. No method has been developed to calibrate degree programmes, even in a single subject, which are designed to appropriately teach students with varying achievement on arrival, and are coloured by each University's particular development of the subject. Neither do we believe that a universal yardstick would be valuable, it would be unhelpfully restrictive on teaching approaches and content, and also in Mathematics lead to universities which admit students with modest but adequate A-level grades awarding almost all students a low degree class and those which admit students with high grades on supplementary papers such as STEP awarding mostly first class degrees. (It is worth observing that in the US GPA levels are not standardised across universities, for instance the Princeton GPA is not directly comparable to the Florida State GPA.)

B10. That some graduates do not get graduate jobs, while employers cannot always find graduates with the skills they require, suggests a mismatch of subjects selected and does not of itself imply a lack of teaching quality.

B11. We set great store by access and widening participation, but do not feel that this should be conflated with judgement of teaching quality. We believe this should continue to be a separate expectation of a university.

B12. We do not believe that the proposed single body can simultaneously encompass the UK-wide functions of the Research Councils and the devolved considerations of the funding councils which operate the other part of the dual support system. The Green Paper overlooks the inherent difficulty of amalgamating UK-wide and England-only bodies.

Public sector equality duty

Question 1:

- a) What are your views on the potential equality impacts of the proposals and other plans in this consultation?
The proposal to increase fees for courses from institutions with highly rated teaching is likely to increase social inequality. We strongly disagree with this proposal.
- b) Are there any equality impacts that we have not considered?

Yes No Not sure

Please provide any further relevant evidence.

See above

Teaching Excellence Framework (TEF) (Part A: Chapters 1-3)

Question 2: How can information from the TEF be used to better inform student and employer decision making? Please quantify these benefits as far as you can.

It is frankly unlikely that a TEF constructed at the proposed speed will make improved information possible.

It is essential that any TEF is carefully constructed and validated, and does not claim to do things it cannot do. [Quantification cannot be carried out without some indication of the unit and criteria to be used. It is not clear that quantification is possible here.]

Some metrics have implications which pull in opposing directions: for instance, whilst students will nearly always ask for more contact hours, it is important for their development as independent learners to avoid excessive contact hours, particularly in the later years.

Question 3: Do you agree that the ambition for TEF should be that it is open to all HE providers, all disciplines, all modes of delivery and all levels?

Yes No Not sure

Please give reasons for your answers.

[None of the above boxes is appropriate here.]

While there should be no TEF unless it is well constructed and validated, if there is such a TEF then we can see no reason why it should not be applied to many of the categories listed. However it must be adjusted to be appropriate for a variety of different institutions.

Question 4: Where relevant, should an approved Access Agreement be a pre-requisite for a TEF award? What other mechanism might be used for different types of providers?

Access and widening participation should not be coupled with judgement of teaching quality. Effective promotion of fair access, and widening participation, should continue to be expected of HEI. A dedicated structure such as OFFA should continue to regulate this activity.

Widening Participation activity needs to be coordinated at a national and regional level, with schools and universities co-operating to ensure that all students are reached while activity is not duplicated.

Access and widening participation, already threatened by current high fee levels and withdrawal of maintenance grants, would be further jeopardised by any coupling of fee levels with teaching quality.

Question 5: Do you agree with the proposals on:

a) what would constitute a 'successful' QA review

Yes No Not sure

b) the incentives that should be open to alternative providers for the first year of the TEF

Yes No Not sure

c) the proposal to move to differentiated levels of TEF from year two?

Yes No Not sure

Please give reasons for your answer.

We do not agree with the proposals set out in paragraphs 26-32 for 'Starting the TEF: Years one and two'. The construction of a TEF will require much more time, and validation. Simply rushing in to set up baseline judgements using any metric to hand is a very unwise way to proceed, and could be really damaging because hasty judgement based on simplistic criteria could easily become self-perpetuating. We also do not believe that there should be levels, even if these were based on valid judgements, because any quantified measure is better with fine gradations and error bars rather than sharp divisions.

[We note with surprise that there is no question on paragraphs 33-41 of chapter 1. For our comments on the matters discussed in these paragraphs, please see B9 in the preamble.]

Question 6: Do you agree with the proposed approach to TEF assessments on

Timing?

Yes No Not sure

Assessment panels?

Yes No Not sure

and process?

Yes No Not sure

Please give reasons for your answer.

We reiterate that we are seriously alarmed at the prospect of a poorly thought out TEF being rushed into in a heedless manner, with no possibility of constructing a valid methodology. See preamble. The difficulties of constructing a TEF are enormous; the quality of the Green Paper proposals in this area suggests that far more time, resource and expertise must be brought to bear before any TEF can be launched.

Timing: a five year cycle could be about right, but simultaneous assessment of all institutions would be better than a rolling approach. We reiterate that the TEF cycle should not start before a carefully constructed and validated process is developed, and that levels are not the way to describe the quality of a HEI's teaching activity.

Assessment panels: discipline-based experts are needed from the outset; once again we reiterate that any TEF cannot start until there has been time for the methodology to be properly established.

Process: since this is not described fully in this document it is not possible to agree. Constructing a good process needs much more time, thought and expertise than has been available to those writing the document.

Question 7: How can we minimise any administrative burdens on institutions? Please provide any evidence relating to the potential administrative costs and benefits to institutions of the proposals set out in this document.

This question cannot be answered until much more work has been done on constructing and validating a TEF procedure. Unnecessary cost should of course be avoided, but minimising burdens should not take precedence over building a good process. A bad TEF is worse than none at all.

Question 8: Do you agree with the proposed approach to differentiation and award as TEF develops over time?

Yes No Not sure

Please give reasons for your answer.

Para13. Reward should be made at discipline level. No TEF quality assessment should be made at institutional level until the discipline level procedure is set up. Workload and quality of work in teaching must be recognised at departmental level if teaching activity is to have comparable status to research. Discipline-level assessment within HEIs is useful to potential students in ways that one at institutional level cannot be.

Para 14. Levels are far too coarse a way to convey such complex information. A number of indicators, both quantitative and qualitative are required, at discipline level.

Para 15. In so far as improvement needs incentivisation, adequate funding, not all via fees, will be much more effective. See B5.

Question 9: Do you agree with the proposed approach to incentives for the different types of provider?

Yes No Not sure

Please give reasons for your answer.

We are wholly against coupling institutional or course fee level to teaching quality. See B4.

Incentives must be designed to reinforce the positive linkage of teaching with research and scholarship. Alternative providers must demonstrate that they have the intellectual capacity to provide degree level education.

Question 10: Do you agree with the focus on teaching quality, learning environment, student outcomes and learning gain?

Yes No Not sure

Please give reasons for your answer.

[None of the above boxes is appropriate here.]

The issue is not these aims, but how TEF can be constructed so as to further these aims rather than unintentionally undermine them. Paragraphs 1-10 do suggest that various important issues have been noted, but omit other issues and underplay some of the difficulties. For example, the proposals could encourage universities to inflate grades.

Yet again we reiterate that the timescale proposed for setting the TEF process going is far too short.

Question 11: Do you agree with the proposed approach to the evidence used to make TEF assessments - common metrics derived from the national databases supported by evidence from the provider?

Yes No Not sure

Please give reasons for your answer.

The proposed metrics are not sufficient, calibrated or validated, and have not been demonstrated to be robust, see B4. The figures they will generate can be influenced by a number of factors other than teaching quality. Metrics can incentivise game-playing and perverse behaviour. An example of this may be seen in GCSE/School league tables where disproportionate resources are concentrated on students at the C/D boundary.

Peer evaluation, as in the REF, is also essential. There must be scope for academic judgement.

Social mobility and widening participation (Part A: Chapter 4)

Question 12:

a) Do you agree with the proposals to further improve access and success for students from disadvantaged backgrounds and black and minority ethnic (BME) backgrounds?

Yes No Not sure

Please give reasons for your answer.

The proposals do not address different levels of participation in different disciplines. Mathematics is a significant subject here, because A-level Mathematics is key to gaining entry to many highly regarded and rewarded courses, as well as successful study. The importance of Mathematics extends well beyond the obvious disciplines such as mathematics itself, physical sciences, computer science and engineering. Provision of mathematical education is often weaker for more socially deprived groups, as is the level of uptake of STEM courses². There is thus a need for discipline-based Widening Participation activity in Mathematics.

While some of the proposals in paragraphs 15, 16 and 17 seem good, the structures for delivering these improvements need further consideration. The figures put forward suggest that something is working, and so we are puzzled why the current system with HEFCE and OFFA is not to be continued. The upheaval in changing to the proposed 'Office for Students' does not seem helpful. We note lack of consultation on whether such changes should be made. We also note with surprise that no mention is made of the Department for Education, even though Widening Participation work clearly involves students

² [CASE report 2012](#)

still at school, both to inform subject choices at GCSE and A-level and to increase prior attainment.

There are some disturbing features of the current arrangement, such as the levy of £900 for widening participation from each student fee at the £9000 level. This appears to be a levy from those who do pay fees; it is not clear that this is a justifiable use of money paid by students. Were fees paid back via a graduate tax, so that the amount paid per student was income contingent, this might not be a such serious issue, but under the current loan arrangements this is a 10% levy on an already heavy debt.

b) Do you agree that the Office for Students should have the power to set targets where providers are failing to make progress?

Yes No Not sure

Please give reasons for your answer.

We are not in favour of combining the functions of OFFA and other bodies into this unified body, and do not wish to see teaching quality and widening participation coupled. Widening participation activity ideally involves collaboration between universities, a competitive model would not be helpful.

c) What other groups or measures should the Government consider?

Universities should be expected to carry out discipline-based Widening Participation activity in mathematics. This is because many disadvantaged groups have poor access to good mathematics teaching in school, and mathematics is an enabling subject for much HE study, including courses which lead to rewarding careers. (Many universities do of course already carry out discipline-based Widening Participation activity in mathematics; an expectation for this would promote proper recognition and reward for such activity at institutional level.)

Generic Widening Participation activity may raise aspirations that cannot be fulfilled. Students admitted with lower mathematical qualifications are likely to struggle with their studies.

Question 13:

a) What potential benefits for decision and policy making in relation to improving access might arise from additional data being available?

Data on participation in different disciplines should help pinpoint where opportunity is limited in particular subjects, and talent wasted.

- b) What additional administrative burdens might this place on organisations? If additional costs are expected to be associated with this, please quantify them.

No comment

Opening up the sector to new providers (Part B: Chapter 1)

Question 14: Do you agree with the proposed single route into the higher education sector?

- Yes No Not sure

Please give reasons for your answer, including information quantifying how the potential cost of entry would change as a result of these proposals.

An ill-prepared start-up institution could be highly damaging to the UK's reputation with international students.

Question 15:

- a) Do you agree with the proposed risk-based approach to eligibility for degree awarding powers (DAPs) and university title?

- Yes No Not sure

Please give reasons for your answer.

No comment

- b) What are your views on the options identified for validation of courses delivered by providers who do not hold DAPs

No comment

Question 16: Do you agree with the proposed immediate actions intended to speed up entry?

- Yes No Not sure

Please give reasons for your answer.

Such immediate actions increase the risk of failure or poor quality arrangements.

Provider exit and student protection (Part B: Chapter 2)

Question 17: Do you agree with the proposal to introduce a requirement for all providers to have contingency arrangements to support students in the event that their course cannot be completed?

- Yes No Not sure

Please give reasons for your answer, including evidence on the costs and benefits associated with having a contingency plan in place? Please quantify these costs where possible.

It is essential to have contingency planning for the failure of a start-up university.

Simplifying the higher education architecture (Part C)

Question 18:

a) Do you agree with the proposed changes to the higher education architecture?

Yes No Not sure

Please give reasons for your answer.

We believe the organisations listed in Part C, Chapter 1, item 5 [BIS, SLC, HEFCE, OFFA, QAA, HEA, HESA, Office of the Independent Adjudicator (OIA) and UCAS] have distinct and useful roles and we do not believe that the proposed restructuring will improve things. As well as being costly, such restructuring will not be as effective as reviewing the role of the various organisations involved, including possible rationalisation. (The list should also include the DfE and the NCTL, given the role of universities in teacher training and the need for coordinated work by BIS and DfE in Widening Participation policy.) Moreover, the impracticality of combining, or placing under a single umbrella, a number of organizations, some of which are UK-wide in their coverage and some of which are devolved to the constituent nations, appears to have been ignored in the Green paper.

It is important that HEFCE, OFFA, QAA, HEA, HESA, OIA and UCAS continue to operate at arms length from Government, both to protect the interests of students and to ensure that the Dual Support approach is maintained.

The proposed title 'Office for Students' is anyway too limited, suggesting a worryingly narrow vision of universities.

b) To what extent should the Office for Students (OfS) have the power to contract out its functions to separate bodies?

Fully Partially Not at all

N/A

c) If you agree, which functions should the OfS be able to contract out?

N/A

d) What are your views on the proposed options for allocating Teaching Grant?

Option 1: BIS Ministers set strategic priorities and BIS officials determine formula.

Agree Disagree Not sure

Option 2: BIS Minister sets strategic priorities and allocation responsibilities divested to OfS

Disagree Not sure

Please give reasons for your answer,

Such decisions should not be political. [Two is the better option, but expertise built up by HEFCE must be used, and further expert advice sought.]

Question 19: Do you agree with the proposal for a single, transparent and light touch regulatory framework for every higher education provider?

Yes No Not sure

Please give reasons for your answer, including how the proposed framework would change the burden on providers. Please quantify the benefits and/or costs where possible.

'Light touch' sounds good, but can simply mean a cop-out. Care must be taken to ensure that regulation covers all important points and that good advice is sought.

Question 20: What steps could be taken to increase the transparency of student unions and strengthen unions' accountability to their student members?

No comment

Question 21:

a) Do you agree with the proposed duties and powers of the Office for Students?

Yes No Not sure

Please give reasons for your answer.

We favour a separation of powers, see previous answers.

b) Do you agree with the proposed subscription funding model?

Yes No Not sure

Please give reasons for your answer.

Question 22:

a) Do you agree with the proposed powers for OfS and the Secretary of State to manage risk?

Yes

No

Not sure

Please give reasons for your answer.

We distrust the structures being proposed and hence their role. However we accept that some arrangement may be needed.

b) What safeguards for providers should be considered to limit the use of such powers?

No comment

Question 23: Do you agree with the proposed deregulatory measures?

Yes

No

Not sure

Please give reasons for your answer, including how the proposals would change the burden on providers. Please quantify the benefits and/or costs where possible.

No comment

Reducing complexity and bureaucracy in research funding (Part D)

Question 24: In light of the proposed changes to the institutional framework for higher education, and the forthcoming Nurse Review, what are your views on the future design of the institutional research landscape?

We do not support the bringing of the two branches of the dual support system under the control of one body. Our reasons are laid out in answers to Qn 25.

Question 25:

- a) What safeguards would you want to see in place in the event that dual funding was operated within a single organisation?

We strongly welcome the commitment in the Green Paper (Part 3, Chapter 1, Paragraph 7) to maintain “the dual support system through dual funding streams”.

However we do not believe that this aim is best served by giving control of both streams to a single over-arching organisation. We note that the Green Paper looked forward to the publication of the Nurse review of the Research Councils – but in fact, when it appeared, that review (page 24) referred favourably to “the four Higher Education funding bodies [having] functions and perspectives which are different to but complement those of the Research Councils”. Moreover Nurse (also on page 24) observed that “there is a need to solicit and respond to distinct research priorities and evidence requirements identified by the devolved administrations”. We do not see how a single body can simultaneously encompass the UK-wide functions of the Research Councils and the devolved considerations of the funding councils that operate the other part of the dual support system. The Green Paper offers no assurances on this, and indeed consistently fails to recognise that there is any issue with amalgamating UK-wide and England-only bodies.

- b) Would you favour a degree of hypothecation to ensure that dual funding streams, along with their distinctive characteristics, could not be changed by that organisation?

Yes No Not sure

Please give reasons for your answer

We do not support the control of the two funding streams for research in HE by a single body, and we do not believe that our concerns can be addressed simply by imposing hypothecation of funding streams.

Let us assume, for the sake of argument, that such hypothecation could in practice be achieved and maintained. Then, even under that hypothesis, we do not believe such an arrangement would be at all satisfactory. One important reason is the failure to address the issue of the different needs and priorities of the various devolved administrations, as discussed already in (a). A second important factor is the need to ensure that the metrics arising from the operation of one stream do not bleed into the functioning of the other stream. To give one possible example – the level of Research Council grant funding is already used as a metric in the evaluation of the environment fraction of the REF, and calls for increased “efficiency” could easily lead to an enhanced role for this crude measure, or – worse – the level of Research Council grant income awarded to an entire discipline could be used as a measure of the quality of that discipline when sharing QR funding between disciplines.

Dual funding is a cornerstone of the university system, reflecting the intertwined and mutually supporting role of teaching and research. It is vital for the future health of

the UK HE sector, and for the quality and volume of research in the UK, that it is not only preserved, but that the structures supporting its implementation make its existence and operation transparent and robust.

Question 26: What are the benefits of the REF to a) your institution and b) to the wider sector? How can we ensure they are preserved?

At the level of the discipline - that is, for the London Mathematical Society, the mathematical sciences in the UK - the chief benefit lies in the periodic provision of a reasonably reliable measure of the volume and quality of UK research in that discipline. There is no doubt that the RAE and the REF have led to a substantial improvement in the volume and the quality of mathematical sciences research in the UK over the past 30 years, and that information about the strengths, weaknesses, dynamics, and concentration of research in the field is now widely available to a range of relevant agents. There are other, damaging effects of the REF, but we recognise that this is not the place to discuss them, although we stand ready to explain our views in the future, and some of our views on this are implicit in our response to Q.27.

Question 27: How would you suggest the burden of REF exercises is reduced?

Some measures which would command a great deal of support with the mathematical sciences in the UK are as follows. (i) Reduce choice by making the return of all academic staff in a department compulsory. (We recognise that there are difficulties in getting the details right here, but believe that there are ways this can be achieved, with huge consequent savings in time and labour.) (ii) Reduce or eliminate the written part of the return, apart from the Impact Case Studies. The Environment can still be assessed by a set of relatively simple metrics (such as numbers of graduating PhD students). If this move is seen as too radical, then the Environment submission could be structured as a set of brief replies to specific questions. On the other hand, we do not believe that there is a substantial role for metrics in the assessment of research outputs in the mathematical sciences. There is a large number of high-quality research journals in the mathematical sciences, so "assessing the journal" can't be used as a proxy for assessing outputs. Moreover, citation metrics would be highly unsatisfactory as a tool, for instance because long publication delays resulting from the refereeing process mean that many submitted papers have almost no time to gather citations, and citation rates vary hugely between subfields of the mathematical sciences, making their use in assessing research quality extremely problematic.

Question 28: How could the data infrastructure underpinning research information management be improved?

No comment.

Do you have any other comments that might aid the consultation process as a whole?

Please use this space for any general comments that you may have, comments on the layout of this consultation would also be welcomed.

[LMS response to BIS House of Commons Select Committee inquiry on 'Assessing quality in Higher Education'](#)

Thank you for your views on this consultation.

Thank you for taking the time to let us have your views. We do not intend to acknowledge receipt of individual responses unless you tick the box below.

Please acknowledge this reply

At BIS we carry out our research on many different topics and consultations. As your views are valuable to us, would it be okay if we were to contact you again from time to time either for research or to send through consultation documents?

Yes No

BIS/15/623/RF