



Department for Business, Innovation & Skills

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

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

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

	Alternative higher education provider (with designated courses)
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	Awarding organisation
	Business/Employer
	Central government
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	Further Education College
	Higher Education Institution
	Individual (Please describe any particular relevant interest; parent, student, teaching staff etc.)
	Legal representative
	Local Government
	Professional Body
X	Representative Body
	Research Council
	Trade union or staff association
	Other (please describe)

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?

Our discipline of Music (which incorporates a diverse range of musics: classical, popular, world; performance, composition, music history, theory; music business, arts administration, music education, music psychology, and many more fields) faces growing problems regarding widening participation, at all levels of study, though especially at HE. There are many reasons for this, including: the demographic-economic background of the student which

facilitates instrumental lessons, event participation and the engagement in extracurricular activities; the access to relevant technologies in school in the class room; the cost of attaining specific exams which are incorporated in the admissions criteria of some institutions. To moderate this, we suggest that the TEF incorporates incentives to widening participation.

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.

The National Association for Music in Higher Education welcomes genuine encouragement to critically reflect on teaching quality. We endorse the main aims of the Green Paper, which seek to improve teaching quality, readdress the relationship between teaching and research as intrinsic, boost social mobility, and ensure that students' achievements are recognised by employers.

NAMHE has concerns, however, about how the TEF can realise these aims and how these are can met across our diverse discipline. In particular, we want to avoid supplementing another administrative task on an already over-worked, stretched profession which has seen many roles, including administrative support, streamlined to a minimum. Such additional tasks could in fact result in the opposite results, by making it more difficult for colleagues to achieve teaching excellent.

The metrics, moreover, raise concerns: a sector-wide metric may not recognise or reveal the diversity within our discipline. Namely, the teaching styles and approaches are necessarily varied to accommodate the creative dimension of the work we do (a detailed interrogation of creativity at the core of teaching excellence can be found in Pamela Burnard's *Musical Creativities in Real World Practices*, 2012). Many institutions utilise some large lecture teaching, but the majority of the pedagogic work we do concerns smaller group teaching (seminars, debate sessions, studio demonstrations, student-led project work) as well as one-to-one teaching (notably in composition tutorials, performance lessons, project supervisions and tutorials). Of great concern here is the fact that the TEF does not make clear whether colleagues who are employed as specialist tutors for instrumental lessons or for professional practice demonstrations are to be recognised within the TEF. The nature of contracts varies and many such staff are employed one a case by case basis (supply to meet demand).

To assess research-led teaching one must also consider the reverse: research can be based in teaching and can result from teaching. Moreover, various access agreements and internal funding streams have supported student-staff research partnerships. The mapping and interplay between teaching and research needs to be acknowledged.

The lack of detail regarding how the TEF will be applied in practice makes any comment on how this might inform employers difficult. The document is aspirational at present. More detail is required concerning the metrics to enable us to quantify any benefits.

To state the obvious, to quantify and assess teaching quality one must also recognise the responsibility of students to value learning in all its forms. Notable to this is a need to formulate the TEF, its criteria and markers of excellence, at discipline level. Submission, as REF, should be peer reviewed by respected academics with specific subject experience. As such, submission should go beyond metrics and include a narrative concerning the departmental environment. Much of the work we do is in collaboration with colleagues. Modules are often co-taught by a team to ensure we draw on the expertise of individuals. No single colleague is necessarily 'excellent' in all areas. A combined approach enables us to draw on our areas of excellence for the best possible experience for our students.

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.

There are many challenges to assessing excellence (and indeed defining it). Keeping it open to all would avoid a two or three tier system. It is notable therefore that TEF is not of direct implication to the Scottish system: publicly publishing metrics for other countries within the UK may suggest a lack of excellence in Scotland, which is not the case. Moreover, if there are financial rewards for TEF achievers, this would disenfranchise institutions who are not part of that process and do have the option to participate. We strive for equality in what we do and would hope that all departments/institutions would be able to benefit from such incentives.

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?

NAMHE supports any approach which would widen the participation of disadvantaged groups. To this end NAMHE has supported work already on gender, through funding research concerning the Gender Quality Mark. Many of NAMHEs member are working on approaches to support the BME attainment gap. Making such an agreement a prerequisite will incentivise HEIs to expand student numbers and to support the diverse range of students. Institutions should be held to comparable standards to avoid a tiered system between the varying types of institutions.

Question 5: Do you agree with the proposals on:

a) what would constitute a 'successful' QA review

Yes No Not sure

There are QA cycles to consider and the document does not provide enough information to make a judgment here.

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.

A phased approach to higher levels of TEF would be preferable. On the timetable noted in the Green Paper, it is difficult to see how the TEF would be implemented in real practical terms. In addition, institutions have a current cycle for QA and a new system could disrupt existing and accepted practices.

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.

REF currently works on an average 6 year cycle: it seems sensible to mode the TEF and REF in similar terms, for parity, and to balance the cycles, especially to avoid both occurring in a single year as the schemes develop. There is need to access up-to-date information but without overly straining colleagues. A regular cycle is accepted but we would opt for a longer time frame.

The Green Paper does not provide enough detail to completely answer the questions. It is not clear how the panels will be appointed, trained, or consulted. It is not clear exactly what their role and responsibilities will look like. We do however support, in the strongest term, discipline-based panels. Excellence is subject-related. Moreover, the nature of the teaching we do may also link to institutional partners beyond HEIs, including work placements, partners in the third sector and so on. To state the obvious, there is already precedence for subject level panels for both QAA benchmarks and REF.

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.

Such burden is one of our main concerns. There is no evidence of precise costs, processed, or workload implications in the Green Paper. Moreover, the incentives for REF are more far reaching in financial terms: it is not at all clear whether such financial incentives will cover the cost of this additional process.

Any new process introduces a certain burden as institutions train staff: this requires time and a phased approach to minimise such burdens.

It is notable here, and elsewhere, that the document suggests there is concern over our currently degree classifications and reference is made to a more widely used GPA system. It is worth noting that such a system would also need to be implemented and staff would need training. This would involve re-writing assessment criteria and so revalidating all modules. If a GPA is core to the TEF this would also add another layer of administrative activity.

Would a regulated system such as this have a detrimental impact on educators' creative, experimental and original approaches to teaching? Would new approaches be seen as un-necessarily risk-based? In a risk-based system, support and acceptance that new approaches need to be trailed must be integrated and time allowed for a new approach to embed itself: teaching improves as one tests an ideas and improves it with feedback and the partnership of students and staff.

To this end, to incorporate both creative approaches and a metric based system, we want to make clear that it is not possible to choose either – or, the peer-reviewed approach is essential. As such, teachers must be at the centre of such an exercise.

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.

Broadly, we agree. It seems a necessary and inevitable result but the criteria must be established by those teaching within disciplines (not only those managing institutions). Without further detail regarding how the TEF will differentiate these awards it is impossible to provide a fuller answer.

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.

The aims of the document refer to fair comparisons, access for all, for all types of institutions as such a system of separating intuitions by type will propagate a tiered system which may disenfranchise some institutions.

The financial incentives are small: comment has been made in *The Times Higher Education* (e.g. Derfel Owen's remarks on TEF, 10 July 2015) and on websites such as WONKHE, and in various articles in the press, including *The Guardian* (e.g. Stephen Jones, 'he 7 Rules the TEF should follow', 7 July 2015) regarding how institutions might be incentivised. There is notable doubt about how raising fees will guarantee participation.

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

The document lists some sensible issues and concerns but it does not clearly define what is meant by excellence and more troubling it does not iterate how it will be effectively measured. We assert that to achieve such a focus on teaching quality within our discipline it must be led and assessed by disciplinary specialist. There are wider concerns raised by TEF than metrics and assessments, which reach to pedagogic practice, creative practices and experiences.

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 metrics mentioned (including NSS, Graduate Employment figures) are in fact already used by HEIs and by league tables. There is a requirement for more detail in these metrics: we are all aware that the destination of graduates is a problematic metric at present as the data is drawn from graduates 6 months after leaving university but a sustained and longitudinal approach is not achieved. A marker of success might be better charted over a longer period (e.g. 2, 5, 10 years). A more reliable source of data could perhaps come from HMRC: we cannot reply only on graduate responses if we are to achieve a detailed, thorough and accountable metric.

The NSS is a marker of student satisfaction which does not directly correlate to teaching excellence. A teacher in a HEI should challenge students: a degree should not be easy, and as a result it will not always achieve happy students. Often the learning process requires students to experience difficult questions and

challenging ideas. Satisfaction often comes only after learning has been applied and a student/graduate can meaningfully see the benefit of such learning and teaching. Namely, teaching must be applied in learning and in wider application within students' wider experience.

There is concern that retention figures do not also reveal the more detailed information regarding the background of the student. These figures should be bench-marked against each other. We would want to avoid institutions selecting student on their social background in order to model 'successful' metrics within other categories.

Metrics referring to staff-student figures are not clearly able to illustrate the precise nature of the work we do due to professional collaborations and partnerships beyond HE. Staff on permanent contracts may also include staff on sabbaticals and research leave. The figures must refer to staff teaching during the period. This links also to the reference to 'Teaching Intensity' in the Green Paper which is not defined. We hope this refers to evidence that students are engaging with their course, in which case there is also a responsibility of students to participate actively in their learning. To state again, we are committed to a range of teaching, including small group teaching and one-to-one sessions for supervisions, tutorials and such like.

A subject association, like ourselves, we believe should be active in helping define the markers of excellence. We, and other similar groups, such be consulted on such benchmarks and metrics. We welcome reference to stakeholders in the document. As NAMHE represents the discipline across the UK and across a variety of HEIs we are already placed to represent these concerns.

The TEFs success therefore will be linked to discipline based approaches, peer review, metrics which provide more information are taken over longer period, and significantly the integration of all layers of the discipline, avoiding only a top-down approach where institutional managers led the definition of such benchmarks.

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 aims and principles are welcomed and NAMHE supports them, but the document does not detail how these aims are to be met. Reference to statistics, though useful, need to be carefully considered as some of the percentile increases are in relation to already small numbers, notably referring to the most disadvantaged groups.

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.

There are a wide range of issues here, and placing this target directly with the OfS would set this metric apart from other issues potentially. Although doing so would ensure HEIs are required to meet the aims of the document.

We are concerned that such a power would enable external forces to impose on institutional-level and department-level admissions targets which we do not support. Institutions must rather work with feeder route (schools, colleagues, communities) to encourage groups to recognise the benefit of HEIs. Targets, such as this, are meaningfully set only at institutional level.

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

The OfS would have powers to hold institutions to account but the Green Paper does not make clear whether the OfS would have the power to make more radical interventions were an institution falling short of targets. There is mention of disadvantaged group and BME in the Green Paper, but it would be beneficial to disaggregate other disadvantaged group, such as those with physical disabilities, in order to ensure that HEIs are both able to meet their needs and to ensure that these students are not lost within metrics.

Question 13:

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

If access to available data was made more accessible, such as the UCAS data, this would enable HEIs to more meaningfully make proposals, changes and to understand the data in a meaningfully detailed context. Equal access to such data is important. HEIs, admissions tutors and such like, should be able to access all information to enable us to see where a potential student has demonstrated intellectual potential and aspirations in spite of difficulties, and difficulties which may have been overcome. Such information would better enable HEIs to grant access to students and significantly to support them once they enrol.

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

We cannot answer this without more institutional level data.

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.

It is not yet proven that a more competitive market would drive up standards, especially when the competition has considered shorter, 2 year degrees and other cost saving devices. We believe that the emphasis needs to be on quality not on time frames and cost. All provides of degrees should be pitched against the same QA and benchmarked procedures and processes. An equal playing field should be set.

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.

The Green Paper lacks details regarding exactly how the TEF will be implemented, benchmarked and what powers the Ofs would have, as such it is impossible to answer this question at this stage. It is not clear whether the Ofs would have an extreme set of interventionist powers.

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

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.

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.

Yes. A continual support to students should be in place. The document does not however refer to students who transfer, or who enter a university as a direct entry to courses after the first year (Level 4) based on the assessment on prior learning and achievement. Where students are transferring, or entering at a later stage, universities should provide support for such student to facilitate a smooth transition.

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 agree that a regulated HE system could be simplified. We do however have concerns that a single body, the OfS, might impose government strategies directly onto disciplinary based activities (both research and teaching) without current support from bodies who have supported and regulated a variety of activities successfully. How will be OfS integrate the functions of the many other current bodies? What exactly will the strategy, directorship and model of this OfS look like? Not all the functions of current bodies are necessarily appropriate for the OfS: notably the QR and research support dimension.

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

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

NAMHE and its members think that a degree of distance is required from government and this should be maintained, to ensure that academic judgements, individual freedom to construct research questions beyond government decree, are maintained. The QAA, alongside HEA and HESA should be maintained.

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

Agree Disagree Not sure

Please give reasons for your answer,

Government by necessity will set strategic priorities. It is crucial, however, that universities remain independent, enabling academics (in research and teaching) to go beyond those set priorities. As priorities change and the development of our countries requirements move forward research and teaching needs to be flexible and maintain a range of subjects, disciplines and field.

Academic freedom should be protected and valued. There has been plenty of comment that research can be directed by institution in previous papers and Acts, but there is not the same reassurance towards teaching.

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

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

NAMHE acknowledges the independence of the Unions and would wish this to be upheld and continued. The Green Paper does not make a case for changing this and does not assert any failings in the current system.

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

Although the regulatory nature of OfS is referred to in the Green Paper, the exact nature of its interventions and roles are not detailed.

NAMHE shares concerns raised in the Press and by other organisation that the financial regulation of universities and their regulatory assessment could form a

conflict of interest and might in fact be dangerous to a fair quality assurance assessment. Transparency must be guaranteed. How can the OfS ensure that the TEF is independent? If powers are contracted to other bodies how are those bodies to be regulated?

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

Yes No Not sure

Please give reasons for your answer.

The cost of such regulatory systems should come from government, as it is government imposing and managing this regulation. The document suggests that such cost however would be a burden on universities. Will any of the funding to cover these costs be transferred to universities, to enable and support them in such a subscription model? Moreover, if there is a subscription, how can this ensure that all institutions, regardless of their type, participate equally with the aims of this document.

Again, we welcome transparency and equality.

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.

The Green Paper does not detail exactly how this risk would be managed.

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

The remit of these questions goes beyond the remit of NAMHE.

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.

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 are in full support of the overall aims of the Green Paper in readdressing the balance between research and teaching, and in support research activity. We support also the dual research support system which has precedence of excellence, as seen in the varied and quality research produced in the UK (assessed via REF and acknowledged in international league tables). Any changes would need to develop from current practices and improve the current situation. It would be important that support is given beyond STEM to incorporate all subjects and all forms of research (beyond the tradition written book and article).

The document separates research in Section D: does this suggest that the regulatory system would in fact further separate research and teaching, in contradiction to the aims of the document? HEFCE at present has been able to consider teaching, research, funding and quality, ensuring that the discourse and changes are considered in their fullest academic context. Academic work integrates teaching but extends beyond it, and those other areas feed directly back into teaching. By default, they are inter-related. We fear that such segregation may contribute to a proliferation of teaching-only contracts, which would not be in the best interest of supporting teaching excellent, whereby excellence incorporates in its definition research, new knowledge and teaching which integrates recent developments in the respected areas.

The relation between research and teaching is mentioned sparingly in this document. As noted by other associations, the relation between teaching and research is a defining and central role of our identity and professional practice.

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 would hope that there is independence in terms of ensuring institutions can directed research internally, as the Green Paper notes.

- 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

Government has redefined the Haldane Principle, increasing their range of influence on research councils. Simultaneously, institutions have become increasingly reliant on research council money and internal targets to achieve

external research income have been introduced and imposed within promotion criteria. As such there is a need to protect the independence of QR funding. We would welcome some guarantees which are longer term and which balance the two budgets, which we see recommended by the Nurse Review.

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?

We are not in a position to response to question a. as we represent a range of institutions.

The REF has made the research environment competitive. It has enabled research to be assessed on a benchmarked system and has the benefit of peer review. Although, this system is heavily burdened with administration. This system is highly incentivised and ensures that research consider the benefit of their research beyond their own institution: we think this wider real world application of research is a positive aspiration.

We are concerned however that the REF enables managers to pick and choice who is submitted to REF. Narratives can be manipulated to select stories and colleagues to present. An open, transparent approach is not completely achieved. If the TEF aims to incorporate all staff with a teaching contract, likewise REF should include all staff that have research as part of their contract. This would make for a transparent system.

QR support the independence of individual academics and this is essential for continued excellence in REF. With the introduction of student fees it would be difficult to argue, especially to students, that they should fund and subsidise research which they may not immediately see as benefiting their education. Moreover, we want to maintain a arm's length distance from government to ensure that academic freedom is maintain and that researchers can explore fields of their choosing.

As TEF aims to assess the health of the sector and to drive up quality, REF has been a precedence toward similar aims for research. The TEF refers repeatedly to productivity: whereas REF has shown research dissemination, income generation and knowledge production contributing t wider UK economic productivity, the TEF is not clear on what forms productivity should take. If that refers only to economic productivity data would be required from a long period to chart graduates developments in employment, their contribution to the economy and so on.

Overall, the peer review system makes REF as reliable, critical and robust as possible. This is a marker of good practice to be continued in TEF.

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

The cost of REF is largely internal and revolves around what has repeatedly referred to as game-playing in which institutions explore ways to present their research narratives by a selective approach o submission (rather than sampling the health of the sector at large it samples only the health of those colleagues selected

for review). We cannot see how this can be reduced at this stage. The financial, reputational and league table positions are too high a cost to reduce effort.

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

There are some problems concerning data collection. There is also the issue of fairness and parity, concerning how colleagues are selected and chosen for input to REF. There is a tiered system with different strategies in different institutions. Comparable approaches are not currently taken.

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.

The GPA is referred to fleetingly in this document without a detailed summary of what expectations are surrounding universities adopting this classification approach and whether this ties directly to TEF level 1 or not.

The document does not take into account the difference in the UK, especially as regards Scotland.

There is not a clear definition of 'excellence' or iteration of the 'productivity' agenda.

NAMHE would welcome the opportunity to contribute to the development of the TEF model and would suggest that, likewise, other subject associations are mobilised activity in a consultation of the refined details beyond a technical consultation exercises.

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