The Assurance of Quality and Standards in English Higher Education from 1992 to the Present: An Economic Interpretation

David Evans-Bibby

The Institute of Education
(University of London)

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Supervisor: Professor Gareth Williams
For Sandra, Neil and Nick, who always asked.
Acknowledgement: I am deeply indebted to Professor Gareth Williams for his kindness, patience and invaluable advice.
Declaration: I hereby declare that, except where explicit attribution is made, the work presented in this thesis is entirely my own.

[Signature]

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Abstract

The thesis is a study of policy comprising an economic interpretation of the assurance of quality and standards in English higher education between 1992 and 2004. The core of the thesis is an analysis of the consequences of the regulatory agencies’ attempt to turn the higher education product into a search good thus facilitating *ex ante* quality assurance. An economic interpretation is congruent with the ‘marketisation’ of higher education and of quality assurance, both of which are linked with market based practice. The semantic issues relating to the many possible interpretations of quality and standards led to a rationalization of terms via juxtaposition with the efficiency discourse of economics.

The study is based on a three part theoretical framework. The trust good theory of professional knowledge is characterized by *ex-post* information asymmetry which renders the assurance of academic yardstick standards hazardous. The dyadic theory of the organizational architecture of universities implies tension between the transactional modes of academic peer group and managerial hierarchy with attendant danger of perfunctory rather than consummate co-operation in the implementation of quality assurance processes. The theory of the complex, vertically integrated university firm embodies a number of potentially separable products with different informational characteristics. Search, experience, and trust goods coexist with implications for the way that quality and standards might be conceptualized and assured when different parts of the process are the focus of attention by the regulatory agencies.

The application of the theoretical framework to the various phases of the policy process analyses the way that quality and standards were articulated by the agencies. The success of the attempt to convert higher education into a search good varies with the signal credibility of the ‘specifications’ which are derived. Excessive documentation production is a natural consequence of ‘rational’ economic behaviour under the Prisoners’ Dilemma pathology.
Chapter 1. Introduction

Introduction
This thesis is a study of the efforts made by the regulatory bodies since 1992, to convert English higher education from something which had to be experienced before its quality could be assessed, into something which could be assessed before it was experienced. Using the terminology of Nelson (1970), these efforts could be characterized as the conversion of higher education into a ‘search good’, the most important characteristics of which could be reliably searched for before the commitment to purchase. The regulatory bodies were concerned with the quality and standards of the sector’s provision, or more specifically with how quality and standards might best be assured. If higher education could be described in unambiguous terms before it was experienced, then such a description would become an important part of the mechanism by which assurance is achieved. The central difficulty involved in this task relates to the degree of ambiguity of the quality descriptors, which is in turn a function of the informational characteristics of the higher education ‘product’1.

Nelson drew attention to the informational characteristics of products and distinguished search goods from experience goods where the latter had literally to be experienced before their true quality could be assessed by the consumer. For this reason experience goods are characterized by ex ante information asymmetry. The central purpose of this thesis is to refine and extend Nelson’s categorization, and to apply it to the history of English quality assurance policy between 1992 and the present.

1 The language of economics is replete with shorthand terms such as ‘product’ which may appear discordant. Moreover, although the marketisation of higher education over the period makes an economic interpretation a congruent one, it is not intended to imply that the economic imperative should dominate, merely that it has a complementary function alongside those of other disciplines. For a strong view of the appropriateness of a ‘mechanistic’ view of the role of universities see Smith and Webster (1998).
An Economic Interpretation: Markets and Efficiency

What is the meaning of an economic approach and how does it supplement other approaches? The informational characteristics of goods is itself an example of economic reasoning and Nelson’s original conception of search and experience goods was applied in the context of the market provision of such goods. The concept of the market is central to economic analysis and is a convenient place to begin.

The marketisation of higher education is congruent with an economic interpretation because the efficiency characteristics of markets is at the heart of modern microeconomic analysis. Economics is defined as the study of the ways of minimizing the constraining effects of scarce resources and ‘economising’ is a shorthand way of describing this process. Markets are central to this process because if they operate perfectly, the decisions of utility maximizing consumers and profit maximizing ‘firms’ are synchronized in such a way that it is impossible to make anyone better off without making someone else worse off. Such a situation is described as economically efficient.

Economic efficiency has a number of dimensions with attendant definitions which are important because they will link later to definitions of quality. Bibby (1992) has identified a three-part classification of the most common dimensions defined as technical efficiency, productive efficiency and allocative efficiency. Technical efficiency refers to the physical process of waste minimization as maximum output is obtained from given inputs or the dual situation where a given output is produced with minimum inputs. As implied by the definition, technical efficiency is dependent on the engineering or technological features of production. Technical efficiency is a necessary but not a sufficient condition for productive efficiency where the latter refers to the lowest monetary cost of producing any given quantity of output. The third and final dimension of efficiency refers to a particular rate of output. Productive

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2 Economic efficiency is often described as Pareto optimality after the Italian economist Vilfredo Pareto who first worked out the comprehensive optimality conditions of an efficient economy.
3 Productive efficiency is defined as a situation where the ratio of marginal physical product to price is equalized for all inputs in the production process.
efficiency is a necessary but not a sufficient condition for allocative efficiency where the latter refers to the output that matches the preferences of consumers. Thus a fully efficient situation is one where waste is minimized (technical efficiency), cost is minimized (productive efficiency) and the optimal amount of the good is produced (allocative efficiency).

A perfectly competitive market ensures that all of the above conditions are satisfied via the equality between marginal cost and price. The advocacy of markets is based on their ability to minimise cost and produce the 'right' amount of the product with minimum interference from outside agencies. Thus the various efficiency dimensions given above are realized through the profit maximization incentive. If firms do not make optimal choices then the competitive process results in their demise.

What relevance does the economic analysis of a perfect market have for the analysis of education in general and the introduction of quality assurance policies in particular? The implications of what has been called the marketisation of public services have been discussed extensively in the academic literature particularly from the educational and sociological standpoint as evidenced in Ball (1990, 1997), Barnett (1992), Dominelli and Hoogvelt (1996), Harvey and Knight (1996), Clarke and Newman (1997), Deem, (1998, 2001) and Morley (2003). Higher education was simply another arena which illustrated the need for public enterprises to be accountable. This move to a new public sector management (Hoggett 1996) reflected political dissatisfaction with the performance of public enterprises and an enthusiasm for the efficiency of market based solutions. Power says of new public management (NPM);

...it emphasizes cost control, financial transparency, the atomization of organizational sub-units, the decentralization of management autonomy, the creation of market and quasi-market mechanisms ... and enhancement of accountability to the customers for the quality of service via the creation of performance indicators. (Power, 1997, page 43)

The quasi-markets that Power mentions are so-called because government rather than the consumer retains the power of purchase, and the institutions cannot readily
increase capacity, or leave the market in response to the behaviour of consumers. Nevertheless the introduction of quasi-markets in schools has been accompanied by the measurement of performance via the attainment of pupils and the 1992 Education Act’s introduction of market reforms was closely followed by the establishment of OFSTED under the 1993 Education Act (Walford, 2001).

So is the introduction of quasi-markets an effective device for mimicking the results of the fully competitive model outlined earlier? Adnett and Davies (2001) provide an economic analysis of the effects of performance indicators on the behaviour of school ‘managers’, most obviously on the tendency for performance results to promote competition instead of co-operation in the education marketplace which suggests that quasi-markets may not necessarily lead to more efficient outcomes. Quasi-markets provide no incentives for the better rated schools to increase pupils’ ‘value-added’ because the latter is imperfectly captured by absolute measures of attainment. If we also recognize the lack of incentive for the less well-placed schools to maintain the standards by which attainment is measured then we are left with a situation where the average level of attainment could actually fall following the introduction of performance tables. This brief illustration of the economic analysis of incentives under new public management illustrates the relevance of a wider application of economics to the introduction of analogous reforms in higher education.

The regulation of quality and standards since 1992 can also be seen in the context of New Public Management. The drive for efficient use of taxpayers’ money has pushed universities closer to markets for some of their ‘products’ and into markets for others. More specifically, home and EU undergraduate students are still funded from the public purse, but there is a flourishing market for postgraduate students. The introduction of quality assurance systems appears congruent with marketisation. If universities are encouraged to act like commercial firms it is natural that they should
be mindful of the wishes of their student ‘customers’, and customer satisfaction is at the heart of quality assurance in the private sector⁴.

Thus far an economic interpretation has been claimed to be helpful in defining the efficiency characteristics of markets and the incentive for their achievement but it is crucially important to note that this same analysis also explains market failure and inefficiency. The term market failure does not necessarily imply either the complete collapse, or absence of a functioning market, but it does imply that there are fundamental problems which prevent the attainment of full allocative efficiency. Since the equality of price and marginal cost defines allocative efficiency, the inequality between these two magnitudes defines allocative inefficiency⁵. There are four sources of market failure; monopoly, externalities⁶, public goods and information asymmetry and in each case price is not equated with marginal cost albeit for different reasons.

Each of the sources of market failure is relevant in the case of higher education and we will return to this matter in more detail in Chapter 2 below. Chapter 2 will also analyse non-market aspects of behaviour, most notably the process of transacting within the firm when it is a more efficient alternative to market transaction and there are important considerations here for the internal organization of the ‘university firm’. An economic interpretation extends beyond the question of what is being analysed to the question of how it is analysed and the important philosophical and methodological issues relating to this question are covered in Chapter 3.

⁴ There were of course other important reasons for the introduction of quality assurance systems in universities which will be discussed below.

⁵ The formal analysis of market failure focuses on allocative rather than productive inefficiency and there is disagreement between economists on whether the absence of perfect competition affects the drive to minimize costs as well as producing sub-optimal rates of output.

⁶ Externalities relate to value or cost that is not fully accounted for by the decisions of individual agents in the economic system. Social (including cultural or intellectual values) benefits may be under-supplied under certain circumstances and such an outcome would be regarded as allocatively inefficient.
Efficiency, Quality and Quality Assurance in Higher Education

The period explored in this thesis began with the 1992 Further and Higher Education Act which ended the binary divide between universities and polytechnics, and established a system for assuring the quality of provision in the newly unified sector. The 1992 Act served to signal the move from an elite to a mass system of higher education in England. Although access to higher education had increased significantly by the end of the 1980s, the fact that public sector providers could now call themselves universities meant that the institutional structure for an expansion of university education was in place. The term massification has been coined to describe this process.

Although the bulk of English higher education involved institutions that called themselves universities, this did not mean that they would become more homogeneous in character. Williams (1990) has argued that the joint impact of massification and marketisation meant greater diversity;

> It has been recognized ever since Martin Trow invented the idea...that mass higher education means greater diversity. There must be a broad spectrum of students with many different aims, interests approaches to learning, previous educational achievements and modes of study. Their teachers will be correspondingly diverse. Some will be leading researchers, others will be professional practitioners, others with practical experience in industry or commerce and some will have particular abilities to help students whose previous experience of education has been unproductive.....The assurance of quality in such a system is more difficult than in the relatively homogeneous elite system. It is also more important. (Williams, G., in Loder, C.P.J., 1990; Page 74)

This contrast between an elite and a mass system ran through the period under consideration and massification and marketisation were part of the reason for the introduction of more formal quality assurance systems.

But what exactly was the nature of the quality that was to be assured? For some writers the diverse system would lead naturally to a notion of quality that was relative to the wishes of consumers as Perry (1994) states;

> If the 1980s was the decade when the public services were driven towards greater efficiency, cost consciousness and value for money, then the 1990s seem fair set to
be the decade of quality......quality is not an absolute even in the education service, nor do we do well to encourage the public to believe that, in this respect, education is different from other goods and services they buy and receive. The woman who buys a Mini may well commend it for the quality of its workmanship ....She does not , however expect it to perform as a Rolls Royce would perform...In other words quality is related to price ...To put it another way, it is fitness of purpose which we judge, and which defines the quality we expect and approve. (Perry (1994), page 31)

The notion of quality depicted by Perry is the same as that embodied in commercial quality assurance systems where the main focus is on quality assurance as a device for ensuring successful performance. Here ‘higher’ quality refers to how close the firm’s performance is to the specifications that it has set for itself. There is no benefit in producing goods that are of ‘superior quality’ in terms of a higher technical specification if they are not wanted by customers at the price that is being charged.

The relativist notion of quality is clear in the context of a commercial market but more problematic in the public sector. Under such conditions the market pressure to reduce costs is less pervasive, and within institutions there is no residual claimant on profits. The concept of allocative efficiency given above related to the equality between marginal cost and price but the pressure to reach such an outcome was the result of competition. If competition is absent then there is a need for a substitute mechanism to evaluate both the costs of producing the product and the matter of whether it meets the needs of customers. There are significant costs associated with obtaining this information which are incurred by regulators. Bibby (1992) has compared the framework used by the National Audit Office with the threefold classification of efficiency given earlier in this Chapter and has shown that the ‘Three Es’ of economy, efficiency and effectiveness are closely related to productive efficiency, technical efficiency and allocative efficiency. The National Audit Office uses the three Es in conducting what it terms ‘value for money audits’ and many of these audits bear the word ‘quality’ in their titles. Thus quality and efficiency are particularly closely related in the analysis of performance in the public sector.

The most obvious reason for the NAO’s conflation of quality and efficiency is once again the lack of a market-based incentive for quality competition. Quality
competition depends for its vitality on the firm’s ability to set a price that matches the specifications of its products. If it exists in a controlled environment where funding and pricing arrangements are given, regardless of these specifications, then incentives for variation are constrained.

The NAO value for money reports evaluate both the *how* (economy and efficiency) and the *what* (effectiveness) of public provision in the selected area. The evaluation of *what* is being produced presupposes that it is worthwhile in the first instance and here we should note the role that regulatory agencies have in acting as an ‘agent’ for those who ultimately experience the product. In the chapters that follow, the quality assurance bodies perform this ‘agency’ role by virtue of the way they articulate the quality of higher education provision.

‘Value for money’ is a widely used term for capturing the relativist conception of quality and is closely related to the microeconomic conception of allocative efficiency. Value for money is used in the policy texts of the higher education quality assurance agencies but these texts also refer extensively to quality as ‘fitness for purpose’. Fitness for purpose has a legal usage in the case of disputes regarding the quality of particular products. A disappointed buyer may claim that the purchased product is inadequate and did not meet her expectations, while the firm supplying the good will claim that the product could reasonably be regarded as fit for the purpose for which it was sold. The complainant’s case is based on the product not being ‘good enough’ in a ‘vertical’ sense, while the defendant’s case is based on the relative notion of good enough for the purpose for which it was sold.

The conceptions of quality through value for money or fitness for purpose are clearly relative conceptions and will be important in the analysis of the policy texts that follow later in the thesis. To return to Perry’s comparison of the Rolls Royce and the Mini both could be of high quality relative to the price at which they were sold. But

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7 The maximization of value for money is defined as the equality between marginal rates of substitution and the price ratio of products for individual consumers. When scaled up for the market this translates into the equality between price and marginal cost.
what of the difference between the two cars? When Perry says that the customer 'does not expect it to perform as a Rolls Royce would perform', she is clearly referring to the fact that a Rolls Royce is a more highly engineered and more luxurious product. This is a widely understood but quite distinct interpretation of quality as meaning 'better' and there is a need for a second definition that can be used for this purpose.

The economic analysis of non-price competition adopts the terminology of horizontal and vertical product differentiation to distinguish products that are different but not necessarily 'better' from products that are both different and 'better'. Extending these descriptors to quality would not be appropriate because, quite apart from being inelegant, horizontal quality would not capture the extent to which the product matched its specifications. Absolute and relative quality is intuitively more appealing but the notion of absolutism raises epistemological and methodological issues not the least of which is the impossibility of identifying fixed absolute benchmarks.

There is a need for a term which conveys the idea of 'vertical' difference without implying an absolute scale. This echoes a development in the economics of consumer behaviour relating to the measurement of the 'utility' which consumers derive from the consumption of a product. Cardinal utility implied that utility could be measured in absolute terms but was superseded by the notion of ordinal utility which could prove the essential maxims of demand analysis with the weaker assumptions that simply required the relationships of 'better than', 'worse than' or 'equal to' without the necessity of an absolute calculation of utility. Henceforth we will use relative quality and ordinal quality to distinguish the two meanings that have been discussed above.

**Quality in the Education Literature**

Harvey (1995) codified the quality terminology used in the education literature with a five part heuristic which included quality as 'exceptional', as 'perfection', as fitness for purpose, as value for money and finally as 'transformation'. Harvey subdivides the exceptional conception into three components; the traditional or elitist view of
quality as 'high class', secondly, quality as exceeding high standards, and finally quality as conformance to minimum standards.

To what extent can this classification be related to the definitions of relative and ordinal quality derived above? The 'high class' and 'exceeding high standards' variants of 'exceptional' are closely related to ordinal quality while fitness for purpose and value for money have been analysed above as variants of relative quality. Conformance to minimum standards is also redolent of relative quality as Harvey states;

For quality to be conformance to relative standards seems to undervalue the notion that quality implies something 'above the ordinary' and the conformance to standards set may seem rather ordinary and in no way exceptional [Harvey (1995): pp 14-15]

The perfection interpretation refers to the characteristic of zero defects or 'getting it right first time'. Getting things right first time has an exhortational flavour that is typical of the quality assurance movement in business management where failure to get it right first time involves costly and inefficient reworking. Poor quality in this sense of 'imperfect' products will ultimately result in the disappearance of the firm as competitors who do get it right replace the laggards. To return to the distinction between relative and ordinal quality, perfection is relative to the specification that has been set by the firm for its product. Whether the product will 'delight' customers depends on their preferences, and there are no guarantees that perfection will translate into commercial prosperity. Thus perfection is a necessary but not a sufficient condition for prosperity.

Harvey's fifth and final conception of quality as transformation, is difficult to relate to relative and ordinal quality because it embodies two distinct features, the 'enhancement' of the service provided to students and the transformation in the students themselves. Quality enhancement is captured by ordinal quality but the transformation of the student is not. The notion of transformation represents

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8 Exhortation reflects the incentive problem where there is a principal agent relationship within firms. Those responsible for getting it right may not necessarily be those with a share in the benefits of so doing.
something that is clearly beyond the ‘point of delivery’ of the service. Since higher education is produced jointly with each student, the resulting transformation is dependent on the extent to which the student herself is enjoined with the process. This situation is different from almost all other products where the provider’s responsibility is more easily finalised.

Harvey’s concept of transformative quality is rather more than simply another quality dimension in that it is the basis of a thesis about the way that learning and teaching should be related to the organisational configuration of universities so that...

...the key to quality improvement lies in empowering academic staff to undertake a process of continuous quality improvement in relation to student learning...if this notion of quality is to prevail then it is necessary for universities as organisations to respond to learning theories and associated research. (Harvey, 1996; page ix.)

This conception links with theories of the university as a learning organisation advanced by Argyris and Schon (1974, 1978), Senge (1990) and Clark (1996). Such universities face the challenge of;


This normative characterisation is important because it represents an educational perspective on the appropriate focus of quality assurance policy. Morley (2003) has argued that the language of the policy process might appear sympathetic but may hide the underlying power relationships that harbour different motives;

The use of the terms ‘enhancement’, ‘development’ and ‘improvement’ invest quality with a morality that is hard to contest. The language becomes self-propagating and disguises how circles of power operate. (Morley 2003; page 489)

Although the thesis focuses on an economic interpretation of the policy process the transformational conception of quality is important in three ways. Firstly it links with the notion of the academic peer group in Chapter 2, secondly the enhancement and development conceptions are prominent to varying degrees in different phases of the policy process, and finally the language used in the texts reflects this conception.

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9 Medical and legal cases represent analogous problems.
Standards

Thus far interpretations of quality have been analysed without any mention of the term ‘standards’. There are three concepts of standards that are important in the thesis, standards as specifications of the service provided to students, standards as a yardstick for measuring student achievement and finally standards as the term used to describe the level of achievement actually reached.

Specification Standards

Standards are widely used in quality management systems as a device for informing and reassuring consumers about the nature of the product or of the management system that generated it. The British Standard ‘kitemark’ and its international ISO 9001 equivalent are the most common examples of such a device and are particularly important where there are informational problems that make it difficult for consumers to judge the true quality of the product in question before purchase. Standards in this context are simply widely accepted specifications that reflect a threshold quality and reflect a signalling process within a market system. The credibility of the signal depends on the reputation of the agency that controls the kitemark or other signifier. If the signal is of high credibility then expensive information gathering activity is reduced and the product becomes more of a search good and less of an experience good.\(^\text{10}\)

There is, in principle, no reason why a university education could not derive specification standards for many of its processes and outcomes. Specification could certainly be applied to the physical and human inputs that are provided. Space, library stock, IT facilities and ratios of academic staff to students are all capable of specification, and while any one of these might occasionally be a misleading indicator of the ‘standard’ of service provided, the problem is no worse than that encountered elsewhere.

\(^\text{10}\) During the 1980s there was a period when some higher education institutions obtained British Standards accreditation [BS 5750] for their internal quality procedures. These were usually on a partial basis and related to consultancy services but occasionally, as in the case of Wolverhampton Polytechnic, it extended to the whole institution.
Specification of the learning, teaching, and assessment service is more problematic in that joint provision requires joint supply of effort. The earlier analysis of the point of delivery problem is again relevant. If standards depend on something over which the supplier has no direct control then specification is more difficult.

Course units and their learning and assessment arrangements are capable of being specified clearly. Thus far we have encountered no great difficulty in linking specifications with the quality of the academic service and we will refer to these as specification standards.

**Yardstick Standards**

The final part of the academic service relates to the conferment of an award which indicates the subject or subjects studied, the level of study and finally the achievement of the individual student. The grading of students' achievement is a complex process involving the professional judgement of academic staff but the provenance of awards depends on the integrity of the grading process. This rather old fashioned concern is at the heart of what is traditionally meant by academic standards - the tacit, implicit value system that informs the judgement of the assessor when a particular learner's achievement is assessed.

It is particularly important to distinguish the yardstick for measuring achievement, from the achievement itself. If we focus on the former, the two necessary and sufficient conditions for a good yardstick are constancy and appropriateness. If both of these conditions pertain then the measurement of achievement is unproblematic. If on the other hand one, or both conditions do not pertain, then achievement measurement is flawed. For example if standards are inappropriately 'high' then a given level of achievement will be assessed at too low a level whereas if they are inappropriately 'low' that same level of achievement will be assessed at too high a level. Moreover if standards are not constant then differences in achievement also
reflect differences in the standards used in the measurement process. These implicit benchmarks will be termed *yardstick standards*.

**Achievement Standards**

The final interpretation of standards is its use to describe achievement itself. Standards are particularly interesting in this category because *a priori* the adoption of the concept of standards to refer to achievement involves a contradiction in terms. Achievement will by its nature, vary from learner to learner and cohort to cohort. Moreover such variation is one of, if not the most important metric in institutional and national policy on the quality of higher education. So far so good, but if the benchmark for measuring achievement is not kept separate from the achievement itself then difficulties abound.

The most common examples of the use of standards to describe achievement are ‘improving standards’, ‘enhancing standards’, ‘raising standards’. It may be the case that any of the above could refer to yardstick standards which are ‘improved’ or ‘enhanced’ by making them more appropriate for the task of measuring achievement. On the other hand if the phrases refer solely to the need to improve the achievement or performance levels of learners then the language is inappropriate. There is a need to identify a descriptor which differentiates achievement from the means by which it is measured. The logic of the preceding analysis is that standards should not be used to describe achievement but this would be unrealistic. The proposal is therefore that outcomes of the assessment process are referred to as *achievement standards*.

**Summary**

The purpose of this chapter was to outline the relevance of economics to an analysis of the regulation of quality and standards in English higher education. The focal theme of the thesis is the attempt to change what Nelson (1970) has called the informational characteristics of provision. More specifically to convert an important part of higher education provision from an experience good into a search good. so that its quality can be assured *ex ante*. 
The context in which the informational characteristics are cast is the economic analysis of markets. The full efficiency characteristics of a perfect market were set out and this was juxtaposed with the sociological and education analysis of quasi-markets contextualised in the setting of what has been termed the New Public Management. The public sector focus of NPM raises questions about the relevance of a private sector market based economic framework and the necessity of a detailed analysis of inefficiency market failure was signposted as relevant in Chapter 2.

The concepts of quality and efficiency were linked attempt to show that although there are a multiplicity of terms that are used in the discussion of quality, they are capable of simplification and rationalisation. The economic analysis of technical, productive and allocative efficiency is not, as has sometimes been claimed, an entirely different discourse from that of quality. Fitness for purpose, value for money, and conformance to specifications are variations of productive efficiency while satisfying the customer relates closely to allocative efficiency.

The link between quality and efficiency was followed by the derivation of relative and ordinal quality where the former related to the extent to which a product matched some pre-stated specifications while the latter related to the conception of 'better than'. Relative and ordinal quality were then linked with a heuristic devised by Harvey (1995) which was a comprehensive depiction of quality definitions used in the education literature and an attempt was made to rationalise the various quality definitions into relative or ordinal quality. Harvey's conception of transformative quality was difficult to encompass in this exercise;

'Critical transformation sees quality in terms of the extent to which the education system transforms the conceptual ability and self-awareness of the student.' (Harvey and Knight, 1996, page 11).

Harvey casts the transformational conception as meta-quality and while the more mechanistic conceptions of fitness for purpose or value for money might offer an operationalisation of transformation, it will inevitably be partial.
Three definitions of standards were identified as relating to the specification of the product, the yardstick for measuring student achievement and the level of achievement actually attained. Specification standards can to some extent be integrated with the quality discourse but yardstick and achievement standards have a more specifically educational context\(^{11}\). In later chapters of the thesis the use by the regulatory bodies of the term ‘quality and standards’ will reflect this reconciliation problem.

The definitions of quality and standards in this chapter have been identified because they relate directly to the work of the Higher Education Funding Council for England (HEFCE), the Higher Education Quality Council (HEQC) and the Quality Assurance Agency for Higher Education (QAA). Each of the three agencies were charged with the tasks of assessing and assuring quality and standards of the teaching and learning experienced by students which was to be the focus of their work (Ball 1991). These tasks would depend for their success on the clarity with which quality and standards were articulated in the policy texts themselves as the attempts were made to convert higher education into a search good. It is intended that the derivation of the definitions and the analysis of the way in which they relate to underlying economic concepts of efficiency will clarify the nature and the scope of the different agencies’ work at various points in the policy process.

\(^{11}\) The term ‘academic standards’ has resonance within the higher education service but is subject to differing interpretations. Within this thesis academic standards are represented by what have been defined as yardstick and achievement standards.
Chapter 2. : The Analytical Framework

Introduction
This Chapter attempts to establish an analytical framework for the later research on the policy texts. The framework consists of three inter-related concepts; a theory of professionalism in higher education, the dyadic organisational form of the modern university, and finally the vertically integrated nature of higher education services when provided by the university ‘firm’.

The configuration of the framework is directly related to an economic interpretation of the policy process and links with the account of what constitutes a particularly economic approach set out in Chapter 1 above. The marketisation of higher education increases the validity of the economic consequences of a more competitive sector, consequences which pertain to universities’ internal and external environment. The theory of professionalism is based on the informational characteristics of part of the higher education ‘product’ which has important implications for quality assurance. The dyadic organisational form of the modern university relates to the location of responsibility for quality and its assurance within the university when two transactional modes coexist. The final part of the framework relates to the scope of the university ‘firm’ and what exactly is being assured. A university is a complex vertically integrated firm producing a range of products which have a corresponding range of informational characteristics.

Professionalism
Sociologists have developed the study of professionalism to a greater degree than other disciplines and Eraut (1994) states that;

Most accounts of the ideology of professionalism follow the functional models...which accord primacy of place to the professional knowledge base. The problem to which the concept of professionalism is said to provide an answer is that of the social control of expertise. Experts are needed to provide services which the recipients are not adequately knowledgeable to evaluate [Eraut, 1994; pp 1-2]

Rueschemeyer (1983) develops this further with the observation that;
...the professions 'strike a bargain with society' in which they exchange competence and integrity against the trust of client and community, relative freedom from lay supervision and interference, protection against unqualified competition as well as substantial remuneration and higher social status. [quoted in Eraut, 1994; p.2]

The sociological concerns with determinants of power and status are clear from these statements but they also point to the crucial significance of the evaluation problem. The recipients of professional services do not have the information to be able to assess its true quality. This informational problem emanates from the very nature of the service provided by professionals and is at the heart of the definition of professionalism that will be developed in this thesis because its focus is an economic interpretation of policy which explicitly aims to 'assure' provision before it is experienced. Furthermore the marketisation of higher education increases the relevance of the economic analysis of market failure and inefficiency, one element of which is the information asymmetry problem.

The term 'search good' used in Chapter 1 is derived from the seminal work on the informational characteristics of goods by Nelson (1970) who used the terms 'search' and 'experience' goods to distinguish what he felt were the most significant groupings. Search goods are those with unambiguous product specifications which customers can understand prior to purchase. In such cases ex ante information symmetry is said to exist between buyer and seller and market based contracting is unproblematic.

Experience goods are characterised by ex ante information asymmetry and full knowledge by the consumer awaits the experience of consumption itself. Information symmetry can only be obtained after the transaction is realised and, although market based contracting is inherently problematic, it can be facilitated by a number of quality signalling devices such as warranties, endorsements, branding and membership of guilds and associations who screen and accredit their members.

12 It is accepted that professionalism is a complex and wide ranging issue and space limits the extent to which it can be developed in this thesis. The scope of the analysis here is the non-evaluative status of the consumer consequent upon ex ante information asymmetry and the resulting need for 'trust'.
Ex ante information asymmetry makes market based contracting problematic because the consumer cannot distinguish higher quality from lower quality before purchase, which in turn reduces the incentive for producers to make higher quality goods. More specifically, market failure through ex ante information asymmetry is caused by moral hazard and adverse selection. Moral hazard refers to the tendency to behave in a more self-interested way because such behaviour is undetectable. Adverse selection refers to the tendency for poor quality to drive out better quality because of the informational difficulties of distinguishing them as shown by Ackerlof (1970).

Many products do not fit neatly into search or experience categories, and most will contain a mix of such characteristics, nonetheless the balance of this mix is important. The informational shortcomings of experience goods are more significant when they are purchased less often. Repeat purchases lead to learning but less regular purchase patterns not only embody less learning but often involve higher levels of expenditure. Nelson’s insight into the differential informational characteristics embodied in goods is important not least because it leads to analysis of quality signalling and the credibility of such signalling as analysed in Spence (1973 and 1974).

Darbi and Karni (1973) developed Nelson’s work by further subdividing experience goods into credence goods which are subject to ex post information asymmetry. Credence goods, are those which cannot be reliably discerned by the buyer even after consumption. Darbi and Karni linked credence goods with fraudulent practice using the demand for automobile repair services as the major illustration. The main point made is that if firms are vertically integrated and provide both diagnostic and repair services there will be a tendency to over provide repair services since the consumer cannot tell whether the quantity sold was really needed.

The concept of credence goods is important because if it is not possible to ascertain quality after consumption has taken place then the informational problem is particularly acute. However as Matthews (1971) has noted, informational problems
are characteristic of professional services but this, in itself, does not distinguish them from those of the non-professional variety.

The credence characteristic is one of three properties that together distinguish professional services, the others are the public and merit good properties inherent in the notion of the ‘public interest’ which professionals must also serve. Examples of such public good properties are a priest’s duty to God, a lawyer’s duty to the court, a doctor’s duty to prescribe cost effective medication in the NHS, and an academic’s duty to maintain appropriate academic standards. In each case the duty is separate from the professional’s duty to her immediate client but may also be in conflict with the latter. A public good embodies two distinct attributes in that it is non-excludable and non-depletable.

A merit good is one which embodies a paternalistic agency relationship since the immediate consumer is not thought to have an ‘appropriate’ utility function and the agent, usually the State, prescribes an alternative preference ordering on behalf of the client’s future utility function – the ‘you’ll thank me for this one day’ criterion.

We are now close to an economic conception of professionalism which will complement the sociological concern with status and power. Professional services involve two sources of market failure, information asymmetry and public merit good properties which makes for a complex outcome. The trust relationship that was posited earlier applies to both aspects of professionalism, but the relationship is between different entities in each case. In the case of information asymmetry, trust is between professional and client, in the case of public merit good aspects it is between professional and the ‘public interest’.

The search and experience definitions of Nelson, and Darbi and Karni’s extension to include credence goods are important to the conception professional service.

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13 This point was made in the Author’s Institution Focused Study where this duty was one given to what was there termed the ‘silent stakeholder’

14 The term ‘client’ rather than customer probably reflects this rather complex relationship.
However the fact that credence goods do not embrace public merit characteristics means that the term credence good is unsatisfactory for the purposes of this thesis. The term that will be used in the remainder of this thesis is trust goods. This new term is necessary because there is no existing term that embodies _ex post_ information asymmetry together with public merit characteristics. Since academic standards involve all of these characteristics the trust good will be put to work in the analysis of quality assurance of academic standards. More specifically it will reflect the difficulty of turning academic standards into a search good which has none of the characteristics defined.

So far the analysis has been conducted in fairly general terms, but it is now appropriate to turn attention to the application of the derived theory of trust goods to English higher education. The higher education service that is the main focus of this thesis is a learning and teaching process that extends over a considerable period of time and is provided _jointly_ with the students that participate in it. Taken as a whole the higher education service has search, experience, credence and trust good characteristics but the remainder of this section will be devoted to the last of these.

The professional goods that are nested within the higher education service as a whole relate to the factors that impact on academic yardstick standards and the provenance of the final award. The designation of a particular course of study as being of bachelors, masters or doctoral level reflects the intellectual rigour of the programme, the formative and summative assessment system that accompanies it, and finally the exercise of specific judgement that utilises the assessment regime to grade the level of achievement of individual candidates. All of these manifestations of academic standards are a trust good as defined above.

The information that would allow for the unambiguous assessment of appropriate academic standards in all of the above dimensions is simply not available.\(^{15}\) The

\(^{15}\) The extent to which certain academic standards can be unambiguously specified is at the heart of the development of some of the most important regulatory processes over the period covered by this thesis.
maintenance of appropriate standards in the grading of work, and the ultimate provenance of awards are at the heart of the trust relationship.

It is interesting to reflect a little further on the specifically economic significance of appropriate academic standards. They are certainly inputs in the higher education process. They were earlier labelled as public goods because the exercise of appropriate academic standards has no opportunity cost [non-depletable] and they are not excludable because there exists no property right in their implementation16. They are also merit goods because appropriate academic standards are thought to be important beyond the preferences of individual consumers, who under certain circumstances may wish for less demanding programmes of study17.

The absence of property rights means that public goods suffer from underprovision and free-riding. There is a classic ‘prisoners’ dilemma’ pathology in the provision of appropriate standards, in that everyone realises they benefit if everyone maintains appropriate standards, but individually each ‘player’ will benefit by their erosion. The informational problems increase the difficulty of detecting ‘cheats’ which merely serve to further encourage erosion.

The final stage in the development of our theory of a trust good relates it to the main focus of the thesis, the assurance of its quality. Quality assurance, taken literally means the unambiguous reassurance, prior to purchase, that the quality of what will be provided will meet the expectations of the recipient. If a trust good is characterised by ex post information asymmetry then this simply cannot be done. Quality assurance of trust goods denies their inherent informational characteristics. It is not difficult to

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16 It could of course be argued that the property right is held by the specific professional group who have this knowledge and ‘outsiders’ are excluded.
17 This is a complex problem in that a given consumer’s preference for ‘higher’ yardstick standards is likely to vary before and after ‘purchase’. High academic standards prior to the final assessment for an award might result in failure and are less attractive than high academic standards after successful completion which enhance the screening effect that possession confers. This highlights the problem with the notion of ‘customer satisfaction’ in the case of trust goods.
see that trust and quality assurance are mutually incompatible. If it is possible to assure the quality of service *ex ante* then trust is unnecessary, conversely if trust is unavoidable then quality assurance is not possible.

It is important to note that the trust good conception of professionalism and its quality assurance relates to the part of the higher education service that is concerned with academic standards, namely the integrity of the assessment systems, and the intellectual 'level' of the curriculum. The boundaries of the trust good will, quite legitimately, be contested by the regulatory agencies and in the market for higher education. Secondly there are important parts of the higher education service that are not trust goods and are capable of unambiguous assurance and these will be the focus of the third part of the analytical framework.

**The Dyadic University Firm**

The award of a royal charter to signify the power to award degrees is an ancient form of accreditation. It signifies that the said institution is a fit and proper place for this activity and reflects the fact that universities are not in existence to maximise the return to shareholders, they have no residual claimants and their governance systems are different from those of the corporate variety.¹⁸

The differences reflect the belief that universities need some freedom and autonomy to be able to pursue scholarship that is independent of the wishes of those in government or business. Such autonomy is a sign of a civilised society. There is obviously a difficulty in judging the excellence of individual universities since, to the extent that they are autonomous, they are beholden to no-one so there is no direct test of their efficiency. The charter signifies the trust of society that autonomy will be used responsibly.

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¹⁸ Of course in an increasing number of cases there are no differences but the 'traditional' university is still the rule.
The previous paragraph has a rather dated air about it. It cannot be denied that the autonomy of universities is being eroded, that they are required to accountable to their student clients, the state and a range of other stakeholders. What is being argued here is not that such accountability is a bad thing but that there will always be an important difference between a university and a commercial firm. This argument is being contested and Barnett (2003) has characterised the contest as the defence of the university’s role as a seat of reason in the modern world threatened by various ideologies.

It is now necessary to examine the organisational structure of the university firm. Once again it is necessary to acknowledge that the detailed organisation of universities differ in important respects both between and within countries. However the term ‘university firm’ implies a degree of universality about the major feature of their organisation which is that they embody two fundamental transactional modes, managerial hierarchy and peer group, The coexistence of these two modes is the reason for the label ‘dyadic’. 19

A transactional mode is mechanism whereby ‘buyers’ and ‘sellers’ accomplish their purposes. The study of why one such mechanism is more efficient than another derives from the transactions cost paradigm originated by Coase (1937) and developed by Williamson (1975). The most common transactional modes are market and managerial hierarchy. Ouchi (1991) states;

...an organisation such as a corporation exists because it can mediate economic transactions between its members at lower costs than a market can. Under certain conditions markets are more efficient because they can mediate without paying the costs of managers, accountants or personnel departments. Under other conditions however, a market mechanism becomes so cumbersome that it is less efficient than a bureaucracy. This transactions cost approach explicitly regards efficiency as the fundamental element in determining the nature of organisations. [Ouchi, 1991, pages 246-247]

19 The term ‘diarchic’ has sometimes been used but this refers to universities that are jointly governed by peer group and hierarchy. ‘Dyadic’ acknowledges the duality of peer group and hierarchy but implies the relative dominance of the latter.
Thus the transactions cost theory not only answers the question of why firms and organisations exist but also why they exist in a particular form. There are three transactional modes identified by Williamson (1975), market, hierarchy and peer group but they are usually depicted as mutually exclusive. Peer group transacting is usually depicted as a workers’ cooperative and is a preliminary stage to the inevitable move to hierarchy because the latter has lower coordination costs.

The bi-modal dyadic structure of universities reflects the fact that the academic peer group coexists with, and is not superseded by, a managerial hierarchy. Not surprisingly this dyadic structure is relatively complex. The university firm is an organisation for producing trust goods but, at least in the United Kingdom, the professionals that are doing the producing are not operating directly in the marketplace for their main teaching and learning product. They are operating in a non-market institutional environment. The managerial hierarchy with which they rub shoulders are, or were, themselves academic professionals and are different only in the fact that their dominant transactional mode is hierarchy rather than peer group. There is a similarity between the conception of the dyadic university and the ‘normative’ and ‘operational’ modes posited by Becher, T., and Kogan, M., (1992). The normative mode could clearly be linked to the values of the peer group, and the operational to the managerial hierarchy but the difference is that Becher and Kogan are not focusing on the fact that the modes are actually being discharged by different group of people with attendant implications for organisational architecture.

The theory of a bi-modal dyadic university is a theory about the organisational structure of all universities. It implies that much of the time the ways that academics transact or contract with each other is essentially relational rather than governed by either prices or administrative fiat. On the other hand academics are governed by administrative fiat in their dealings with the managerial hierarchy of their universities even though this hierarchy is largely composed of temporarily seconded, or

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20 Subsequent to the first draft of this chapter being completed, it was discovered that Lewis, R.G., and Smith, D.M., (1994), refer to the ‘dual’ organizational structure of colleges and universities when distinguishing administrative and academic functions.
permanently appointed, academics. The question that now arises is whether a dyadic structure is permanent rather than a feature of a system in transition from collegiality to hierarchy.

There is little doubt that the need for increasing financial control to facilitate the efficient internal allocation of university funds emphasises the need for effective management practice (Warner and Palfreyman 1996), which in turn leads to the development and enhancement of hierarchical transactional modes relative to the academic peer group. However the academic peer group will not be completely dominated. It retains significant power and autonomy by virtue of its knowledge and expertise and the way that this ensures the validity of the curriculum and the assessment system, which in turn ensures the provenance of that university's awards. If they did not have this power then the situation would be rather different as evidenced by the dominance of the managerial hierarchy within further education colleges.

The second reason for doubting the disappearance of the dyadic structure is the scope of the academic peer group. The Jarratt Report is credited with the introduction of a more managerialist structure in English universities and although Jarratt himself restates the need for sensible resource allocation procedures he accepts the crucial importance of the invisible college:

When we suggested to him that his report promoted the corporate enterprise but that academic researchers need to pay more attention to the discipline at the invisible college, Jarratt replied that 'if you are not paying attention to the invisible college then you won't succeed because you would ignore the very thing you are there to do'. [quoted in Kogan, M., and Hanney, S., 1999, pp 186-187]

In their analysis of the Japanisation of school education, Morley and Rassool (1999) pointed to the significance of kaizen in fostering team spirit. But they also refer to the sister concept of kaisha which can be loosely translated as 'companyism' and ensures that the focus of continuous improvement is always the company. Thus while there are similarities between the team spirit of the corporate sector and peer group contracting in universities, the invisible college extends beyond the university firm.
This extension is of critical importance because it prevents the growth of companyism in the university firm and the elimination of dyadic structure.

In one sense the peer group within any given university refers to the collective academic community in that institution. Academics have certain characteristics in common, most notably their preferences for consensus decision making. However the invisible college is in reality a number of ‘colleges’ each based upon subjects or disciplines which provide the context within which research and teaching is carried out (Becher (1989). Furthermore while the reputation of any individual will be affected by institution specific behaviour, the crucial reputation enhancement device is the respect accorded published work within the wider subject community. Thus as Becher and Kogan (1992) have shown, each university’s academic collective can be divided into sub-groupings each of which has ‘tentacles’ beyond institutional boundaries which sustain vigour and reputation.

From the standpoint of the university’s managerial hierarchy this dual allegiance is potentially problematic. If its academic community enhances its reputation in the eyes of external ‘peers’ then the university’s reputation is also enhanced and ‘goal congruence’ exists through the ongoing activity of CV enhancement. Goal congruence is clearly evident in the case of highly rated research and publications but greater ambiguity exists in the case of teaching effectiveness which is characterised by absent or ineffective property rights.

It is interesting to note the claim that there is a significant difference between pre- and post 1992 universities in the prominence of the managerial hierarchies of the respective groups of institutions which according to Evans (1999) is a direct consequence of their legal status:

It remains important that a university is a community. A strand in the definition of a university which has been of consistent importance is the notion that it is a corporation….There was also incorporation in the forming in 1992 of the ‘new’ UK universities, but there the corporators are the Board of Governors not the whole academic community. The difference is fundamental, because in these latter-day structures collegiality has ceased to be of the essence. It has been replaced by hierarchy. (Evans, 1999; page 67)
It is somewhat ironic that having drawn attention to the legal difference above Evans goes on to identify the link between collegiality and the guardianship of standards.

The corporate structure not only expressed a relationship of equality among its members, it was also concerned with the maintenance of standards. Institutional structures are not inimical to the work of scholarship. They save the individual teacher having to make independent arrangements to collect students together, and having to seek to hold onto them in competition with others. They can provide an assurance that what is taught meets an acceptable standard and that any mark of mastery of the subject such as a degree or gradus has some meaning. (Evans, 1999; page 67)

The standards to which Evans refers are no longer entrusted to the collegium in either ‘old’ or ‘new’ universities and it remains to be seen whether handing their guardianship over to external agencies leads to an outcome in the public interest. Evans’ view about the legal difference between old and new institutions suggests that the balance between the two transactional modes will be different. Be this as it may, political reality is such that in English higher education in 2004 the dyadic structure is an inevitable characteristic of both.

If it is acknowledged that dyadic structure is an inevitable feature of the university firm then it is appropriate to draw out the possible implications for the internal management and assurance of quality. The important role of the trust relationship in the definition of professionalism has obvious implications for the peer group whether the latter is defined in the broader sense of the whole community of scholars, or the narrower sense of a group identified with a subject or discipline. However when professionalism is contextualised in the dyadic university firm the emphasis is more on the collective rather than the individual aspects of the relationship. The collective exercise of professional expertise has very specific efficiency enhancing consequences defined by Williamson as *ex ante* screening and *ex post* monitoring. Such screening and monitoring is important because efficiency can also be eroded by the potential for free riding as the difficulty of identifying individual productivity tempts the less committed to ‘shirk’ their responsibilities.
It was pointed out above that the attempt to 'assure' information that is necessarily 'impacted' in professional service provision can be dysfunctional. This tendency is present in the relationship that exists between professionals when they transact within the institution. More specifically, the replacement of relational contracting by documented standard procedures runs the danger of a compliance culture. To use Williamson's terminology once again, consummate co-operation is replaced with perfunctory co-operation. The 'atmosphere' enhancement derived from altruistic transacting is diminished.

The concept of the dyadic university firm is of direct importance to the analysis of the quality assurance policy process in Chapters 4 to 7 below. There are three reasons why this is so. Firstly the design of systems for assuring quality and standards needs to be sympathetic to the social economics of relational contracting between members of the academic peer group. A well designed system will encourage a spirit of co-management of quality and standards, while a system which ignores the informational problems associated with unambiguous specification will lead to a compliance culture. Secondly, the different phases of policy will be seen to change the focus of responsibility for quality assurance between peer group and hierarchy, with important consequences for policy outcomes. Finally the work of Jensen and Meckling (1992) has emphasised the significance of organisational architecture for the success of any quality assurance system and the dyadic organisation of universities poses particular problems which impact on the success of any system.

**The Scope of the University Firm**

The transactions cost paradigm serves to explain institutional as well as organisational structure. Institutional structure refers to the vertical links from inputs to process and on to the outcomes of the higher education 'product'. It also includes horizontal links between learning and teaching, research, and consultancy. The fact that all of these activities are carried out within the typical university is explained in the transactional paradigm by the idea that it must be more economical to do so. The vertical and horizontal links involve complementarities in resource use which are
efficiency enhancing. If they were not efficiency enhancing then there would be no
economic incentive for integration and the products and processes would be produced
separately.

To some extent this picture is an oversimplification. When universities are buttressed
by state funding, the pressure to respond to market incentives is blunted and their
structure has not been tested in a more hostile commercial environment. Indeed there
are strong arguments that information technology is leading to some unorthodox
learning structures Secondly the international provision of some programmes takes
place in collaboration with non-university institutions overseas. Be this as it may the
'traditional' university is both vertically integrated and horizontally diversified and
the unorthodox arrangements referred to above are usually founded on a parent
institution that has a traditional institutional structure. Finally, if we turn once again
to the United States for evidence of the most market based universities, the traditional
structure and scope have not been significantly affected by market forces.

To return to the main theme of this section the traditional institutional structure is
characterised by vertical integration of input, process and outcome and horizontal
diversification beyond qualifications to research and consultancy. This structure
reflects two possible causes of cost savings; the traditional technical cause linked to
possible economies of scale and scope, plus the transactional advantages of
internalising activities rather than using the market.

The main focus of this thesis is on the policy relating to the quality of the integrated
learning and teaching process that culminates in a qualification but it is necessary,
when pursuing this focus, to keep the other 'products' in view. We are not interested
in the detailed analysis of research and consultancy per se, but these other products
are generated by staff who also support students. For this reason the possibility of

21 The use of the term outcome rather than output reflects educational convention as well as policy
practice, where the final stage of the learning process is extensively referred to in terms of 'learning
outcomes'.
discretionary effort means that the labour supply relationships between the three products are of substitutability and complementarity.

We begin with the learning and teaching process but before proceeding it is necessary to find a shorthand term for this process. The term ‘process’ could be confused with the second phase of the integrated product and omits the inputs and the outcome; we need to be clear that we are referring to everything that a given student experiences from enrolment to qualification. It includes the physical embodiment of the university – its buildings and other physical learning resources. It includes the academic and support staff and the systems within which they deliver their service. Finally it includes the qualification that is gained at the end of the course, manifested in an award which has a particular standard and reputation\(^22\). There is no widely accepted term for embracing all of the above. Although a little cumbersome we will use the term Total Student Experience (TSE).

The complexity of the higher education TSE is reflected in the schematic set out below and is derived from three characteristics; the fact that the TSE is a service, the fact that it is produced jointly with the student, and finally the fact that it extends over a considerable period of time.

A service is inherently difficult to define because it has no physical manifestation. It is for this reason that the \textit{ex ante} specification of service entitlements is particularly important. Where the recipient of such a service is passive there are few problems – you get what you pay for, and provided there is no misunderstanding about entitlements, that is the end of the matter. However in higher education the recipient is not passive, the process of engaging with the service provider is an active one where what you get depends not only on what you paid for, but the effort you make to

\(^{22}\) There is a sense in which even this list is incomplete; social and academic experience are inextricably linked, and the wider urban or rural environment of any university has an important bearing on recruitment.
benefit from it. Under these conditions it is obvious that the concept of a ‘point of
delivery’ is problematic especially when the typical English undergraduate
programme extends over three years.

The complexity of provision is reflected in Figure 2.1. The inputs box is the most
straightforward and covers all human and physical resources provided to the student.
The one exception to this description is student ability at entry. The learning process
box is difficult to define because it could be argued that all its elements belong
elsewhere. Event productivity could be said to be an outcome while everything else is
an input.

Economics has a parsimonious approach to production functions; inputs combine to
produce outputs and although it is accepted that there are a range of possible technical
relationships between input and output the *process* by which the transformation takes
place has traditionally been regarded as a ‘black box’ issue. The black box label
carried the implication that activity inside the box was of no direct economic interest because the need to maximise efficiency in a competitive environment would result either in optimum decisions or the demise of the firm.

There is one notable exception to this approach. Penrose (1959) made the distinction between inputs and the services derived from those inputs and argued that variability in the quality of such services was a function of the management of the firm. The Penrosian conception of ‘management’ is very useful in an educational context because it refers, in the broadest sense, to the transformative nature of human intervention when resources are put to use.

The elements of the second box in Figure 2.1 include staff and student ‘effort’ to reflect the discretionary nature of the situation. Defining the inputs available to the student is distinguished from the subsequent engagement process from both sides – *ceteris paribus* a highly motivated student will draw higher quality responses from staff. But there is more to the engagement process than defining effort made. The design, management and productivity of the learning ‘event’ are intended to reflect Penrose’s concept of input services so that a highly motivated student will derive even greater satisfaction (productivity) if learning ‘events’ are designed and managed appropriately.\(^{23}\)

The final box in Figure 2.1 contains outcomes and although conceptually straightforward the devices used to measure them suffer from signal credibility problems. If the credibility issue is put to one side for the moment then learning outcomes measure the transformation of learner knowledge in both qualitative and quantitative senses. The qualification could be viewed as the formal confirmation of all learning outcomes to at least the appropriate threshold level.

\(^{23}\) The concept of an ‘event’ is intended to be broad, and includes any learning episode – lecture, seminar, tutorial, laboratory session, workshop, placement, etc.
Given the complexity of the Total Student Experience it is not surprising that its quality assurance would also be complex. The informational characteristics of the higher education course vary as the focus moves from inputs through process to outcomes.

The inputs present few informational difficulties for quality assurance in the sense that while measures are never perfect, reasonably reliable and credible measures exist for physical and human resources. Student ability on entry is usually proxied by entry qualifications such as GCE A- Level. Process presents greater quality assurance problems. The effort made by both students and academic staff can be examined via inspection of events and scrutiny of documentation, but signal credibility is lower than for inputs.

Assurance of the quality of outcomes has the superficial appearance of being more satisfactory because of its direct rather than indirect focus. The difficulty here is that the benefits of such directness may be more than counterbalanced by the costs of low signal credibility due to the possibility of varying academic standards embodied in the assessment of the outcomes themselves.

**Summary**

The quality assurance of higher education services is characterised by complexity. At the heart of this complexity is the informational nature of the service itself. This informational issue has a crucial impact on the definition of the professionalism of the individual academic, the dyadic organisational structure of the university firm and finally its vertically integrated and diversified scope of operation.

Assuring the quality of such a complex product is inherently difficult. Quality assurance is essentially an *ex ante* notion in that it provides credible assurance to the buyer that what will be consumed is of appropriate quality but if *ex ante* information is asymmetric, then quality assurance is not possible. In Chapters 4 to 7 below quality assurance policy can be seen as an attempt to transform the higher education product
into a search good and to lessen the inefficiency that would otherwise result from the inadequacy of prior information.
Chapter 3: Methodology

Introduction

The efficiency properties of markets, and the conditions leading to market failure and inefficiency are a central concern of economics and it is hoped that an economic interpretation of quality assurance during a period of marketisation of the sector will be thought worthwhile. The purpose of this Chapter is to examine the philosophical bias of economics, to clarify the methodological devices that are used to develop the arguments in the thesis and to detail the methods that were used to undertake the primary research that underpinned the thesis. The primary research served two purposes; to substantiate the assumption that academic peer groups will comply with, rather than own quality assurance processes, and secondly to obtain evidence on particular events in the policy process that would otherwise be hidden from public view.

The Methodology of Economics

In philosophical terms, methodology comes toward the end of an interdependent process including ontology and epistemology. The ontological - epistemological - methodological triad will vary between, and sometimes within, academic disciplines. Since this thesis is an economic interpretation of policy it follows that the philosophical bias of economics will be evident, but the education focus of the Programme and the fact that the thesis is a policy study involves rather different philosophical traditions which draw from sociology and education. This mixture poses a significant challenge in that the analysis has to embody an acknowledgement of philosophical bias.

Neoclassical economics represents what might be termed the dominant paradigm in modern microeconomic analysis. The ontological assumption of neoclassicism is the existence of economically isolated selfinterested individuals while its epistemology is severely reductionist regarding 'reality', where its amount is the minimum
necessary to do the work that needs to be done. The notion of economic rationality posits that individuals behave as if they wish to maximize their utility when operating as consumers and profitability when operating as users of scarce resources. The 'as if' term acknowledges that this description should not be taken to mean that there is no scope for ideological, spiritual or other impulses in human behaviour, but it does mean that there is a belief by its practitioners that theories based on economic rationality will be more successful in terms of their prediction of conditional outcomes.

Friedman (1953) is often quoted as the classic statement of positive economics and it provides a useful focus for the characterization of neoclassical economic methodology. The most striking feature of Friedman's view is its ontological impact; what matters is not the reality of the assumptions of a theory but rather the accuracy of the predictions that are made. Parsimony becomes the hallmark of 'good' theories, and there are direct implications for the epistemology of neoclassical economics which is correspondingly parsimonious. Such parsimony is possible if it coexists with the view that social relationships and institutions do not matter, another characteristic of neoclassical economics, and an obvious point of demarcation between economics and sociology. The neoclassical paradigm's ability to maintain such demarcation is dependent on a number of assumptions, the most important of which are the existence of perfect information and stable preferences. It was under such conditions that the efficiency properties of a perfectly functioning market was cast in Chapter 1 above. Neoclassical economics also embodies market failure and attendant inefficiency which was the basis of the informational characteristics of goods analysis in Chapter 2 and which will be applied extensively in the policy-based Chapters 4-7 below.

24 Parsimony is a valued characteristic of neoclassical economic models and increased realism per se is not thought to indicate a better model. This of course is in marked contrast to the epistemology of sociology where contextualisation is a crucially important aspect of theorizing in that discipline. 25 Conditional outcomes are of the 'If A then B' variety. Economics has gained a rather negative reputation from the claim that 'prediction' meant predicting the future. As McCloskey (1976) has shown, economists are no more adept than physicists, chemists or anyone else at predicting the future. The precise location of the blame for this reputation vis a vis economists and non-economists is the subject of much debate! The disenchantment with macroeconomic prediction has led more recently to greater emphasis on the conditional prediction of microeconomics which is more relevant to the subject matter of this thesis.
However the conception of the dyadic university firm in Chapter 2 was outside the neoclassical paradigm and, in methodological terms, is interesting because it manifests an inter-disciplinary paradigm based upon the significance of institutions. The so-called New Institutional Economics (NIE) is derived from Coase (1935) and further developed by Williamson (1975) and North (1981), and is based on the elaboration of the effect of the positive cost of effecting market transactions. The relative cost of transacting in the marketplace as opposed to within a firm, constitute the basis of Coasian theory of why firms exist in the first instance, and once established, why they develop in particular forms. This particularity gives rise to context-specific rationality as opposed to the ‘universal’ rationality of neoclassical economics. One important application of context specific rationality is game theory particularly in the form of the Prisoners’ Dilemma Game which will be used in Chapter 4 below to explain the phenomenon of excessive documentation production by universities preparing for subject assessment by the HEFCE.

NIE bases its theorizing on the formal constraints facing decision making agents but the transition to context-specific rationality serves to direct attention towards informal constraints and the social context in which relationships exist. This is the heartland of the New Institutionalism in sociology.

Sociology’s role can profitably go beyond the insights from game theory to explain the connection between the subinstitutional domain of social action and concrete relationships and the meso- and macroinstitutional domains of custom, conventions, law, organizations, ideology and the state. (Brinton and Nee, 1998, page 3)

The depiction of the academic peer group in Chapter 2 and the application of peer group mediated views of academic standards in Chapter 6 is a form of economic sociology at the interface between New Institutional Economics, and New Institutionalism in sociology.

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26 Brinton and Nee link New Institutionalism in sociology with the Weberian tradition of comparative institutional analysis.
McCloskey and Methodological Rhetoric

Although it has been emphasized above that neoclassical economics does not encapsulate all of the economic theories that will be used in this thesis, the dominance of neoclassicism both inside and outside the discipline poses significant challenges for an economic interpretation of education policy.

McCloskey (1990, 1994) has provided an elegant framework for a consideration of the different methodologies that can be mobilised in support of an argument. The McCloskean concept of the rhetorical tetrad of metaphor, logic, fact and story is intended as a rebuttal of the neoclassical agenda in economics and the related view that the closer theories are to those of the natural sciences the more valid the argument. This rebuttal goes with the grain of much educational and sociological writing but the attraction of the rhetorical tetrad is its stress on the multiplicity of ways of persuading an audience and the retention and validity of 'scientific' forms of persuasion where they are likely to bear fruit. McCloskey is concerned to re-establish what he describes as the Aristotelian conception of rhetoric as a means of persuading an audience.

The choice is not between rhetoric in the history and English departments and non-rhetoric in the math and physics departments. The choice is between being aware or not being aware of the effects of one's speech, whether verbal or mathematical...[We] are not advocating flowery speech or the abandonment of mathematics. We are advocating the study of how economists actually persuade each other and the world. (McCloskey, 1994, page xv)

McCloskey’s depiction of economics as a subject which has descended into arid formalism is contentious, and it is not necessary to agree with such a view here. However his advocacy of a less restricted epistemology is an attractive one in this thesis when the subject matter occurs at the interface between different disciplines. How then are the elements of the rhetorical tetrad related to the focus of the thesis?

Metaphor

McCloskey deliberately eschews the term ‘model’ for metaphor to emphasise its role in the art of persuasion. The term metaphor emphasizes the ‘as if’ notion that lies at
its heart. Thus the coincidence of demand and supply curves are a metaphor for the coming together of buyers and sellers and the generation of a market clearing price. Such curves or functions do not 'really' exist in the form depicted in economics textbooks but are indisputably powerful devices for understanding reality. Closely related to the idea of a model is the acceptance of abridgement of reality – the model is a substitute for reality.

The dyadic firm set out in Chapter 2 is a metaphor for the internal architecture of English universities. This depiction would be less relevant if the focus of attention was the funding arrangements of higher education but is important in understanding the alienation of academic staff in the face of quality assurance arrangements that they perceive to be de-professionalising in their impact.

Logic
Logic emphasizes the 'if-then' of deductive reasoning. If consumers are assumed to maximize utility from their expenditure then it follows logically that they will strive to equate the ratio of marginal utility to price for all goods bought. Logic is often inter-related with metaphor and so if firms wish to maximize profit and there exists excess demand in the market there will be increases in price until equilibrium is restored.

The informational characteristics of goods analysis posits signaling as a logical consequence of information asymmetry. Profit maximization dictates the logic of the situation whereby credible signals will tend to dominate non-credible signals prior to purchase. Credible signals will provide more valid assurance of the quality of what is to be experienced. In the regulated higher education marketplace agencies will need to have regard for such signal credibility if the quality assurance system is to be well-designed from the standpoint of the student 'customer'.

27 Because demand curves involve the summation of individual demands involving different marginal utilities of money, and supply curves for individual firms only exist in perfectly competitive markets.
Fact
Fact is characterized by the process of inductive rather than deductive reasoning and by particularity rather than generality. Facts are often represented by numbers but sometimes by events and recorded statements. They are usually depicted as uncontroversial and impersonal but there are many instances where facts are personal and very controversial indeed.

In a study of policy of the kind involved in this thesis there are facts related by the texts of the regulatory agencies in terms of the design of the assessment and assurance regimes. Facts also relate to the views of respondents in the empirical evidence that underlies the analysis.

Story
The final and arguably most controversial of the rhetorical devices, the telling of a story again involves particularity rather than generality, and is complementary in terms of the links made between one event and another through time. A story is a good one if it aids understanding and the various components ‘hang together’ in a coherent way.

The assurance of quality in English higher education is a story of a particular sequence of events and the agencies that were involved. It is a chronology of a particular strand of activity but the telling of the story draws in all four elements of the rhetorical tetrad. The strength of McCloskey’s rhetorical tetrad is the insistence on all four activities and the folly of focusing solely on the so-called ‘hard-scientific’ half of fact and logic, to the exclusion of the ‘soft-humanistic’ half of story and metaphor.

Empirical Evidence
The empirical evidence that underlies the thesis was collected in two phases, the first between February and July 1999 researched the views of eleven of what were termed
‘front-line’ academic staff extensively involved in the learning and teaching of students. The second between October 2003 and March 2004 researched the views of five relatively senior participants in the work of the HEFCE, the HEQC and the QAA.

**Phase 1: Compliance versus Ownership**

The relationship between ownership and compliance of quality assurance processes is important in determining their efficiency and effectiveness. High levels of ownership lead to greater levels of engagement so that regulators and regulated could be seen as co-managers in the relevant processes. Relatively high levels of compliance would be less compatible with co-management as practitioners are conscripted rather than voluntarily engaged.

**The Research Process**

The sample of respondents was stratified and partially non-random. The stratification related to the aim of:

1. Including an appropriate number of respondents from each of the three departments in the Business School.
2. Including a gender balance that reflected that of the School at large.
3. Including respondents that had a range of both age and years of service.
4. Excluding professors and what might be termed ‘senior’ managers in the School.
5. Excluding respondents with whom the author had, over the years, extensive discussions on the subject matter of the research where bias was possible.

The non-random part of the sample consisted of four respondents who were deliberately selected because they could be described as quality assurance professionals. This designation refers to the fact that all of these academics have a significant teaching commitment in the specific subject area of quality assurance.

At the beginning of each interview a short statement was made explaining the fact that the research was part of a doctoral programme at the Institute of Education, that

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28 The full title of the research was *The Balance between Ownership and Compliance: A Case Study of Peer Group Conceptions of Quality Assurance and Quality Enhancement Processes in the University of Portsmouth Business School.*

29 I was not able, within the resources at my disposal, to check rigorously the age distribution and years of service of all staff in the School so this aspect of the sample is necessarily more impressionistic.

30 In two cases out of the four quality assurance is also the focus of research and consultancy.
there was a confidentiality protocol and that the text would be available for scrutiny to any respondent who was interested.

Table 3.1. Characteristics of Respondents

<table>
<thead>
<tr>
<th>Interviewee</th>
<th>Gender</th>
<th>Department</th>
<th>Course Management Responsib.</th>
<th>Teaches QA</th>
<th>Years in HE(^{31})</th>
</tr>
</thead>
<tbody>
<tr>
<td>Interv. 1.</td>
<td>F</td>
<td>Econ</td>
<td>Yes</td>
<td>No</td>
<td>32(32)</td>
</tr>
<tr>
<td>Interv. 2.</td>
<td>F</td>
<td>Econ</td>
<td>No</td>
<td>No</td>
<td>6(6)</td>
</tr>
<tr>
<td>Interv. 3.</td>
<td>F</td>
<td>Econ</td>
<td>No</td>
<td>No</td>
<td>7(7)</td>
</tr>
<tr>
<td>Interv. 4.</td>
<td>M</td>
<td>AMS</td>
<td>No</td>
<td>Yes</td>
<td>15(5)</td>
</tr>
<tr>
<td>Interv. 5.</td>
<td>M</td>
<td>AMS</td>
<td>Yes</td>
<td>Yes</td>
<td>4(4)</td>
</tr>
<tr>
<td>Interv. 6.</td>
<td>F</td>
<td>AMS</td>
<td>Yes</td>
<td>No</td>
<td>12(10)</td>
</tr>
<tr>
<td>Interv. 7.</td>
<td>M</td>
<td>BAM</td>
<td>Yes</td>
<td>No</td>
<td>25(5)</td>
</tr>
<tr>
<td>Interv. 8.</td>
<td>M</td>
<td>BAM</td>
<td>Yes</td>
<td>Yes</td>
<td>8(8)</td>
</tr>
<tr>
<td>Interv. 9.</td>
<td>M</td>
<td>BAM</td>
<td>No</td>
<td>No</td>
<td>8(8)</td>
</tr>
<tr>
<td>Interv. 10.</td>
<td>F</td>
<td>BAM</td>
<td>Yes</td>
<td>No</td>
<td>18(7)</td>
</tr>
<tr>
<td>Interv. 11.</td>
<td>M</td>
<td>Econ</td>
<td>No</td>
<td>No</td>
<td>25(25)</td>
</tr>
</tbody>
</table>

Department abbreviations key: Econ = Economics; AMS = Accounting and Management Science; BAM = Business and Management

The interview had only an outline structure relating to the four concepts of quality, standards, quality assurance and quality enhancement. Each interview was allowed to develop in accordance with its own momentum. Further participation by the author was limited to answering occasional questions from the interviewee. Probing was done for two reasons, for further information where meanings were not clear or to refer to statements already made by the respondent.\(^{32}\)

**Reading the Data**

The procedure following the production of each transcript was as depicted below

Fig. 3.2. Data Distillation Procedure

1. Open coding by reading transcript once using highlighter
2. Allow three day interval
3. Return to transcript for repeated reading (immersion in data)
4. Create pattern codes for 4 interviews transcribed by author
5. Code remaining 7 interviews transcribed by audio-typist and create new codes where necessary
6. Identification of themes
7. Relevant data from each of the 11 interviews amalgamated

\(^{31}\) Figure in brackets indicates the number of years in higher education spent at the University of Portsmouth

\(^{32}\) The author's inexperience with semi-structured interviewing led to occasional lapses.
The themes referred to in Fig.3.2 emerged from the interviews and were grouped under the four concepts of quality, standards, quality assurance and quality enhancement which together constituted the outline structure of each interview. The themes and their meaning are summarized in Figure 3.3.

**Fig. 3.3. Themes and Their Meaning**

<table>
<thead>
<tr>
<th>CONCEPT</th>
<th>THEME</th>
<th>MEANING</th>
</tr>
</thead>
<tbody>
<tr>
<td>Quality</td>
<td>Striving</td>
<td>Striving, as a professional practitioner, in an open-ended way to do one's best for students</td>
</tr>
<tr>
<td></td>
<td>Differentiation</td>
<td>Acknowledgement of different views and conceptualizations of quality.</td>
</tr>
<tr>
<td></td>
<td>Customers</td>
<td>Acknowledgement of the relevance of the customer in the commercial conception of quality but not necessarily agreement with its validity in education.</td>
</tr>
<tr>
<td>Standards</td>
<td>Academic Standards</td>
<td>Linked with judgement involved in assessment and felt to be real but intangible.</td>
</tr>
<tr>
<td></td>
<td>Competition</td>
<td>Manipulation of academic standards to recruit required number of students.</td>
</tr>
<tr>
<td></td>
<td>Duality</td>
<td>Two meanings of standards one traditional (academic standards) the other more related to the specification of quality.</td>
</tr>
<tr>
<td></td>
<td>Specifications</td>
<td>Acknowledgement of the specification-based notion of quality especially for non-academic aspects of provision</td>
</tr>
<tr>
<td>Quality Assurance</td>
<td>Approval</td>
<td>Quality assurance procedures are both necessary and helpful</td>
</tr>
<tr>
<td></td>
<td>Documentation</td>
<td>Overproduction of documentation which often doesn't relate to what is actually done.</td>
</tr>
<tr>
<td></td>
<td>Optimality</td>
<td>Getting the balance right between documented procedures and what actually happens</td>
</tr>
<tr>
<td>Quality</td>
<td>Improvement</td>
<td>Commitment to continuous improvement reminiscent of the Striving theme above - acknowledges commercial interpretation but also includes individual student development.</td>
</tr>
<tr>
<td>Enhancement</td>
<td>Resources</td>
<td>Pressing need to improve physical environment, support facilities and time to do things properly</td>
</tr>
</tbody>
</table>

Full results of the theme development are set out in Appendix 1 below and the interpretations that flowed from them will be used at various points in the following chapters to augment the development of the argument being made. For the present it should be noted that this research, undertaken prior to the beginning of the thesis, provided the stimulus for the view that the implementation of quality assurance
provided the stimulus for the view that the implementation of quality assurance processes will elicit in academic peers groups a response of compliance rather than co-ownership.

**Phase 2: Policy Participants**

The second phase of research was undertaken firstly in order to gain information on particular events within the development of policy which were, to a greater or lesser extent hidden from public view and which could be described as discontinuities in the policy process. The discontinuities in question were the concern expressed in 1994 by the Secretary of State for the academic standards of British degrees, and the sudden end of subject assessment in 2000 together with the resignation of the Chief Executive of the QAA, John Randall. The respondents who were likely to be informed about these matters were direct participants in the policy process sometimes at a senior level. The second reason for interviewing policy participants was to obtain their own views on particular aspects of the policy process.

The five respondents were selected on the basis of their direct experience of the work of the agencies, and included a very senior member of both the HEQC and the HEFCE. Since the experience of each respondent was of a different aspect of policy, the questions were not standardised between respondents. In each case, although the two policy discontinuities mentioned above were part of four of the interviews, the dynamic of each interview was determined by the way each respondent replied to the questions. Each interview lasted approximately 45 minutes, responses were recorded in note form and written up the same day. The interviews were subject to accuracy and confidentiality protocols which are set out fully in Appendix 3. The responses of these interviewees is included in the relevant policy chapters below.

**Policy Texts as Data**

The policy texts of the regulatory agencies are central to the arguments developed in this thesis. The most obvious function that they have is to specify the configuration of
the various regimes that have determined the structure, conduct and ultimately the performance of the agencies’ attempts to assure quality and standards since 1992. The ‘primary’ texts are those published by the agencies who are charged with policy implementation. The status of texts varies from definitive statements of policy – what will be assessed, how it will be assessed, operational details of visits and protocols for published reports, to consultation papers summarizing possible areas of development. Primary texts, whether definitive statements or consultation papers have been published by the HEFCE and the QAA. The work of the HEQC generated policy texts which were very important but which had slightly different status in the sense that the Council, owned by the institutions themselves were not directly linked with the funding arrangements for higher education. The HEQC had an important role in the intellectual development of quality audit, assurance and standards and its texts are an important source of information on the philosophical underpinnings of policy. Additionally it is possible to see the clear link between the HEQC’s earlier work and the subsequent definitive policy texts of the QAA. In addition to the primary texts of the agencies the Dearing Report and the CHES Report are important sources of information on the development of policy.

The reading of the policy texts is congruent with the economic interpretation which has been set out in Chapter 1 above. The attempt to depict higher education as a search good in order to better assure its quality ex ante means that the analysis will focus on the way that quality and standards are actually articulated in the texts. Since this articulation is dependent on the informational characteristics of what is being defined the issue of signals and signal credibility becomes important. The locational focus of quality assessment and audit episodes outlined in the texts, links with economic rationality via the Prisoners’ Dilemma Game to explain documentation responses.

Summary
The methodological pluralism of the rhetorical tetrad will hopefully have dispelled the fear that an economic interpretation is unduly mechanistic or reductionist in
structure. Nonetheless it is an economic perspective and contrasts markedly with that of other disciplines.

The focus of the economic perspective can, to an extent, be appreciated when compared with alternative perspectives. Harvey and Knight (1996), Evans (1999), Barnett (2003) and Morley (2003) have adopted historical, philosophical and sociological perspectives on the quality issue and a forthcoming contribution by Brown will deal with the political dimension. Each of these perspectives illuminates the issues in a particular way, reflecting the methodology and scope of the relevant discipline. Each can be seen as complementary rather than substitutable in a fuller understanding of the policy process.

Within each chapter the application of the analytical framework will reflect the particular historical phase of the policy process and the scope of the regulatory agency. The essence of an economic explanation is that the events reflect an economic dynamic rather than happenstance, and are explicable in terms of a stylised framework or model.

If the definition of quality and standards is clear then the next closely related stage is the acknowledgement of the notion that the informational characteristics of goods are important when such goods are ‘marketised’. Since the higher education product is subject to severe informational deficiency an important function of each chapter is to show how the product is actually being presented in the policy texts. Information deficiency means that product presentation is often indirect through various signaling devices, and the credibility of such devices is of paramount importance.

The third aspect of the economic perspective is the application of the dyadic theory of the university firm and the relationship between this theory and the self-interested behaviour of the participants. The thesis will advance the view that the various phases

33 Brown, R., (forthcoming February 2004), information disclosed in a personal conversation with the author.
34 This applies for the period 1992-97 when the dual agency system existed.
of the policy process are a consequence of such behaviour within institutions. More specifically the co-existence of managerial hierarchy and academic peer group necessarily involves tension where incentives to co-operate with quality assurance requirements are ambiguous. The result is a top-down compliance system which depends for its effectiveness on extensively documented ‘show and tell’ responses.

The thesis embodies the juxtaposition of an analytical framework with a policy process that has unfolded over a ten year period. The analytical framework is an economic one involving the assumption of rational economic agents common to what is known as neoclassical economics but the framework draws on economic contributions that go outside the neoclassical paradigm to include new institutional economics and transactions cost economics.
Chapter 4: Quality Assessment in the Newly Unified Sector

The Nature of the Quality to be Assessed

The term 'quality assessment' reflects the vocabulary of the Higher Education Funding Councils whose creation were proposed in the 1991 White Paper (CM1541), and established by the 1992 Further and Higher Education Act. The purpose of quality assessment was;

1. To ensure that all education for which the HEFCE provides funding is of satisfactory quality or better, and to ensure speedy rectification of unsatisfactory quality.
2. To encourage improvements in the quality of education through the publication of assessment reports and an annual report.
3. To inform funding and reward excellence (HEFCE, Feb.1993, para.5.)

HEFCE Circular 3/93 was explicit about its interpretation of both quality and quality assurance in higher education. Four ‘principles of quality’ were identified;

a. Teaching and learning are inseparable: teaching involves the whole management and promotion of student learning by a variety of methods, including student access to a wide range of learning resources.

b. The quality of teaching and learning in a diverse sector can only be understood in the context of an institution’s own aims and objectives.

c. Assessment of the quality of education in the context of an institution’s own aims and objectives allows quality to be specified in terms of the match between the teaching and learning process and the students’ ability, experience, expectations and attainment.

d. Quality can and should be assessed both in terms of student achievement and in terms of the totality of the learning experience. (HEFCE, Feb.1993, Section B, Para. 11.)

Principle a. was straightforward and emphasized that when the term Teaching Quality Assessment [TQA] should be interpreted in a wider context than simply the evaluation of classroom sessions. Principle b. indicated that relative rather than absolute quality was the core principle which together with Principle c. and d. underpinned the acknowledgement of a diverse higher education sector.

The four principles were followed by a statement of the Council’s belief about the most appropriate approach to quality;

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35 Although oddly it deals with the details of quality assurance [Section B para.2], before defining its principles [Section B, para. 11.]
The Council believes that an approach to quality which encompasses the breadth and depth of student achievement and learning experience, based on an institution’s own aims and objectives, will allow for a consistent and rigorous quality assessment process respecting diversity of institutional mission. (HEFCE, Feb.1993, Section B, Paras. 12 and 13.)

Principle b. made clear that if HEFCE were to be consistent then quality was the extent to which aims and objectives were realized, regardless of what such aims and objectives were. With such a belief, it is difficult to understand how the claim to ‘a consistent and rigorous... approach’ could be sustained. The only consistency was the extent to which aims and objectives were realized.

Moving from quality to its assurance the HEFCE stated that quality assurance was to be sub-divided into three constituent ‘aspects’:

- Quality control: mechanisms within institutions for maintaining and enhancing the quality of their provision.
- Quality audit: external scrutiny aimed at providing guarantees that institutions have suitable quality control mechanisms in place.
- Quality assessment: external review of, and judgements about, the quality of teaching and learning in institutions. (HEFCE, Feb. 1993, Section B, Para. 2.)

The HEFCE did not appear to be using quality control in the commercial sense of reducing variability of quality, rather it was saying that all of the universities’ internal quality assurance policies and procedures would be labelled quality ‘control’ while the external scrutiny of these same policies and procedures would be labelled quality ‘audit’36. Quality ‘assessment’ was the word given to judgements about the assessment of outcomes rather than the process that led to them37.

Quality Assessment 1993-95

The assessment of quality had three elements;

1. An institutional self-assessment in the subject, supported by relevant statistical indicators [SIs]
2. Examination of the self-assessment and SIs by assessors...
3. Judgement of the quality of education which may involve an assessment visit by a team of assessors. (HEFCE, Feb.1993, Para.11).

36 In practice the term ‘control’ was dropped almost immediately.
37 Although, as will be shown below, subject review also evaluates quality assurance at the level of subject rather than institution.
The principle of self-assessment was consistent with the belief that responsibility for quality rested with the institution. This was a self-assessment of a self-defined set of aims and objectives.

The judgement of the quality of education would involve three categories;

- **Excellent**: Education is of a generally very high quality.
- **Satisfactory**: This category will include many elements of good practice. Aims and objectives are being met and there is a good match between these, the teaching and learning process and the students’ ability, experience, expectations and attainment.
- **Unsatisfactory**: Education is not of an acceptable quality: there are serious shortcomings which need to be addressed (HEFCE, Feb. 1993, Section B, Para.15.).

The initial evaluation of an institution’s claim was based on the self-assessment and accompanying SIs and a visit by a team of assessors would be made only if a *prima facie* case for excellence had been made or secondly if there were grounds for concern that quality may be at risk. If neither of these criteria were met then a visit did not take place unless the institutions subject area happened to be part of a sampling exercise. If a visit did not take place the relevant provision would automatically be graded as satisfactory whether or not a claim for excellence was being made.

The rejection of a claim for excellence without visiting the institution was surprising. It would have meant that, having set its own aims and objectives, an institution made its self-assessment, judged itself to be excellent, but was found to be unjustified in that assessment. Given that the judgement was being made solely on the basis of the documented claim, a great deal depended on the way that a claim was drafted and HEFCE acknowledge the need for guidance;

... institutions will find it helpful to have guidance on ... The relationship between the institution’s mission and the statement of course or subject aims and objectives, and consider how well the latter are achieved. In addition a self-assessment might also include:

1. A discussion of the department or faculty’s definition or understanding of quality, informed by relevant institutional policies
2. Plans for maintaining and enhancing quality
3. Internal indicators of quality
4. An input from students,
5. A judgement on the quality of education achieved (HEFCE b.1993, Section B, Para. 19.)

There is little in this list to inspire confidence in the extent to which a self-assessment could contain sufficient credible indication of provision. The 'internal indicators of quality' were presumably derived from similar sources to the Statistical Indicators [SIs] that accompanied the Self-Assessment. However the HEFCE did not regard SIs as crucial:

SIs contribute contextual information... they prompt questions rather than provide answers. (HEFCE, Feb. 1993, Section B, Para. 23.)

Returning to the rejection of a case for excellence without visiting, it must have been the case that the decision followed rejection of the arguments in the self-assessment document. There was obviously an asymmetry in the establishment of a *prima facie* case through the self-assessment documentation. It was clear that a *prima facie* case could be made for excellence, but the case was not conclusive until a subsequent visit confirmed the documented arguments. If excellence was rejected then assessors were acknowledging a *prima facie* case for 'not excellent', but did not feel it necessary to confirm their rejection with a visit.

The visit itself was the second major feature of the subject review system and the 1993 document heralded a wide interpretation of the remit for review;

Assessment will range widely across the breadth of teaching and learning activity... and... will focus on areas such as:

1. Aims and the curriculum
2. The nature of the student intake
3. Methods of teaching and learning and assessment...
4. Student support
5. Student achievement
6. The impact of internal academic management and quality control
7. Learning resources
These eight ‘areas’ were the forerunners of what were later to be developed as ‘aspects of provision’.38

The experience of this form of quality assessment was reviewed in 1995.39 Within the period there were three rounds of assessment relating to different subject areas and overall 26% was judged to be excellent, 73% satisfactory and 1% unsatisfactory. Over 77% of excellent judgements went to institutions in the former UFC sector, the former polytechnics secured 22% with 1% in the Further Education sector.

Given the strength of the chartered universities, this result might be expected, but if the relativist interpretation of quality via institutions’ own self–assessments was taken into consideration it was more surprising. The former polytechnics were considered to be teaching orientated, with extensive experience under the CNAA of tightly structured and documented programmes and this experience might have been expected to yield a different result. The HEFCE noted;

The reports in the first eight subjects indicate that, notwithstanding the emphasis on assessment in relation to the different stated aims and objectives set out by institutions, academic and professional peers identify a number of characteristics that are associated with excellent education across subject areas and across the wide range of the higher education sector. The evidence in the reports on excellent provision also suggests some differentiation between subjects and between the two former sectors of HE [emphasis added] (HEFCE, Nov. 1995, Page 30, Para 83).

The HEFCE conducted a detailed assessment of the peer judgements of the characteristics of excellence. More particularly the Council was sensitive to the way that such characteristics might be related to the old and new universities respectively, Analysis focused on three relationships; association between research and excellence, between size of provision and excellence and finally between institutional prosperity and excellence.

The results of this analysis could be summarized in all three cases as a positive but qualified relationship. On research the Council stated;

38 Although the HEFCE assessment of quality was to be mission-based this focus on areas provided the basis for a standardized set of criteria that would later be articulated in the subsequent phase of policy.
...preliminary analysis of a limited evidence base suggests that there is some validity in the suggestion that the higher the RAE rating, the more likely a judgement of excellent... However looking at the RAE achievements of the excellent providers, the data also confirms that the highest achievements in teaching and learning can be secured without the highest achievements in research. (HEFCE, Nov.1995, Page 30, Para.83)

The comments on size of provision are ambiguous;

There is nothing in the assessment reports on excellent provision to suggest that the size of provision as such has had an influence on assessment teams.

... Nonetheless the data do suggest, certainly for some subjects, that peers have tended to find the characteristics they value in the larger providers (HEFCE Nov.1995, Page 34, Para.108).

On the third relationship between excellence and institutional prosperity the Council stated:

... the quality assessment results have been examined against total institutional income divided by student population. This analysis reveals the excellent quality provision as concentrated in the relatively prosperous institutions. (HEFCE Nov. 1995, Page 35, Paras. 111 and 112.).

It was not surprising that 'excellence' was linked with ordinal notions of quality, but the system was supposed to be based on quality relative to aims, objectives and outcomes. In practice, it would appear to be impossible to separate the two notions.

Quality assessment between 1992 and April 1995 suffered from three difficulties. Firstly there was widespread dissatisfaction that important judgements would be made without a visit to corroborate the judgement. Selective visiting had the advantage of lower cost but was also based on the assumption that the bulk of provision was neither excellent nor unsatisfactory. This system generated internal political problems within institutions that link with the theory of the dyadic university firm. A failure to make a claim for excellence was a credible signal to the senior management of the institution that the management of that subject area was prepared to settle for a grading that might reflect complacency. Risk averse managers would opt for claims of excellence to signal that complacency did not exist. If a judgement

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40 One of the departments in the author’s faculty was an example of this problem and a personal conversation with the Head of Department confirmed this.
of excellence did not follow then the subsequent representations and arguments at least offered the possibility that the judgement was unjust.

The second difficulty was terminological. Defining the bulk of higher education provision as 'satisfactory' constituted negative signalling, particularly in the international market for students. HEFCE was guilty of naivety in not fully appreciating the use that would be made of its judgements, and the possibility that large numbers of institutions were 'not excellent' or 'only satisfactory'.

Finally there was felt to be a need to refine the focus of assessment so that institutions had a clearer idea of the dimensions that would be evaluated. The HEFCE acknowledged that there were shortcomings and summarized the options available in its consultation document 2/94\(^1\). Consultation 2/94 together with Circular 39/94, marked the transition from the first to the second system of quality assessment in England. This transition would not involve a significant shift in the philosophy of quality regulation but would refine the approach to important operational matters.

The evolutionary approach was confirmed by the Secretary of State for Education in an important address quoted in Consultation 2/94:

> I do not believe that the accountability which we need can be provided solely by a system which safeguards the standards of degrees... We must continue to look to an assessment of the quality of teaching and learning to meet my...objective of accountability for public funds.... I believe also that some link with funding will serve to enhance quality over time...[The possibility of universal visiting]...could assist the scope for offering to potential students and employers an assessment of relative quality in a form in which they can readily understand.... In summary I see a distinction between the need to maintain academic standards and the need to provide accountability for substantial public funds invested in higher education. The former is a matter for the academic community. The latter is for both the Government and the academic community [emphasis added] (HEFCE June 1994, Page 3, Para. 15).

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\(^1\) HEFCE (June 1994), *Further Development of the Method for the Assessment of the Quality of Education*, [Bristol: HEFCE]
Thus stakeholders would need more robust reassurance that universities would continue to discharge their duty to provide appropriate learning and teaching. The reference to 'relative quality' in this address implied that the information resulting from quality assessments would indicate differences in the quality of one provider 'relative to' another. So far so good but in the following paragraph HEFCE identified one of the three 'purposes in regard to quality assessment' as;

Providing effective public information on the quality *relative to institutional mission and subject aims and objectives, of higher education* [emphasis added] (HEFCE June 1994, Page 3, Para. 16).

Relativity clearly had two dimensions – the extent to which aims and objectives were met by a given provider, and the differences between providers in this regard. It was questionable whether stakeholders could ‘readily understand’ such a methodology.

Document 2/94 should be seen in conjunction with a Report, commissioned by HEFCE from the Centre for Higher Education Studies at the Institute of Education of the University of London – the CHES Report. HEFCE document 2/94 embodied the CHES Report’s 44 recommendations as an annex. 33 recommendations were accepted as a logical development of existing HEFCE practice, 8 were designated for further consultation with the sector and 5 were rejected. The main focus of both of the above documents was on two of the three central problems of the assessment system – selective visiting and the focus of assessment. The third problem related to negative signalling; this would be addressed by the proposed solutions to the other problems.

Judgements based on documentation alone would be discontinued. However once the universal visiting decision was taken, the way that judgements would be scaled was also resolved;

The introduction of a four point scale and the introduction of universal visiting are therefore, in the Council's opinion, bound together. Universal visiting cannot be justified... unless the extra information provided by judgements made on a four point scale is an outcome (HEFCE June 1994, Page 8, Para. 39).

42 The standards of degrees would receive more specific attention later the same year following the Secretary of State’s visit to the Far East. This matter is discussed in Chapter 5 below.
This did not resolve all of the problems because there remained the issue of whether the component parts of an institution’s provision should be scaled as well as, or instead of, a summative scaled judgement. These component parts of provision related to what the CHES Report referred to as an institution’s ‘quasi profile’.

Profiling was an important philosophical and methodological change in quality assurance policy in the sense that it made the focus of assessment less discretionary. CHES recommended that the headings

Should... appear in the outline of the self-assessment in the assessors handbook, the template and the published report so as to provide a uniform framework throughout the quality assessment methodology. [emphasis added]. (CHES Report, Annex A, para 38, page 14.)

**Quality Assessment from April 1995**

The results of the consultation exercise were contained in HEFCE document 39/94. The developments of HEFCE’s method of assessment had four dimensions—universal visiting, the establishment of a core set of aspects of HE provision, the use of graded profiles, an overall threshold judgement and finally the production of one rather than two reports on each assessment visit.

The move to universal visiting reflected widespread agreement on the shortcomings of the existing method of assessment. However the development of core aspects which would receive graded profiles had been discussed in the CHES Report and rejected. CHES recommended a single category reflecting ‘a threshold of sound provision’. This recommendation was rejected by the Government and graded profiles of ‘core aspects’ introduced.

The CHES Report contained a detailed analysis of what it termed ‘The Concept of Quality in Quality Assessment’, and it was in this context that the issue of core aspects was examined.

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43 HEFCE [December 1994], The Quality Assessment Method from April 1994, [Bristol: HEFCE]
44 The terms of reference of the CHES Report ruled out fundamental change in the grading system ‘its aim is neither advocacy nor prophecy’ (CHES, 1994, page 3)
If the intention is to adopt a thoroughgoing fitness for purpose approach to quality and to begin from an institution’s own mission and/or programme aims and objectives, then the prior specification of aspects to be assessed has to be suspect. A fitness for purpose approach, or an approach which began purely from aims and objectives, would leave it open to institutions to specify the aspects and criteria against which they were to be judged. A strict fitness for purpose approach also rules off-limits any concern with the fitness of an institution’s purpose. [first emphasis added] (CHES Report, Page 18, Para. 5.6.)

CHES acknowledged that the way out of this difficulty was to prescribe ‘aspects of programme delivery over which there can be no debate’ and this was precisely what HEFCE did. The six aspects were; curriculum design content and organization, teaching learning and assessment, student progression and achievement, student support and guidance, learning resources and finally quality assurance and enhancement.

The consideration and testing of each aspect involved two ‘different types of judgement’;

They judge both the extent to which the actual student learning experience and student achievement in each of the aspects of provision contribute to attaining the objectives set by the subject provider, and the extent to which the objectives set, and the level of attainment of those objectives, allow the aims set by the subject provider to be met. (HEFCE, Dec. 1994, Page 16, Para. 48)

The first of these tests was straightforward – the extent to which realized outcomes match planned outcomes. The second test was more difficult to interpret. It appeared to refer to the design of planned outcomes. There are important definitional issues relating to this analysis in that the term ‘outcome’ is being used in a very particular way by the HEFCE. Outcomes link with objectives in the Aims and Objectives methodology;

The aims were both broader and higher order phenomena to which the objectives and outcomes made a contribution.

The aims express the subject provider’s broad purposes in presenting each programme of study in the subject. (HEFCE Dec. 1994. Page 11, Para. 39)
Table 4.1

The objectives set out the intended student learning experiences and student achievements. Such intended experiences and achievements are normally expressed in terms of the expected learning outcomes of the academic programme... (HEFCE, Dec. 1994, Page 12, Para. 39)

Since aims, unlike objectives, were not discussed in terms of outcomes, it is tempting to regard them as things that providers strove for, but whose attainment was a matter of degree.

There are two parts to the second test. The objectives set are a design matter while the 'level of attainment' of the objectives was a matter of performance. Table 4.1 sets out the scale points together with their HEFCE descriptors. Each of the core aspects was subject to the two tests described above and the resulting 'score' was assigned. The descriptors provided evidence for the 'coverage' of aims and objectives discussed earlier. The 'and/or' phrasing of Scale Point 1 suggested that it was possible for objectives to be met but for aims to be unrealized and vice versa. In fact this phrasing was because some institutions did not always provide both aims and objectives and sometimes conflated them⁴⁵. Scale Point 2 introduced the statement

⁴⁵ This information was provided by an examiner of this thesis.
about the contribution that the aspect made to the attainment of the stated objectives which was repeated for the higher scale points. It is curious that Scale Point 1 omitted this statement, i.e. the aspect did not make an acceptable contribution. Scale Point 2 asserted that there is an acceptable contribution to the attainment of objectives and aims are broadly met so we must conclude that both objectives and aims were matters of degree. The phrasing of Scale Point 3 implied that aims were met in spite of a failure fully to meet objectives. This undermined the interpretation of aims as higher order phenomena. It also cast doubt on the validity of the second test referred to above which implied that the realization of aims was conditional upon both the objectives set and their attainment.

To return to the graded profile, if all elements were graded at 2 or above then the profile received an overall judgement of 'quality approved'. If one or more aspects were graded at 1 then the overall judgement was reported as subject to reassessment within a year. If, on reassessment the provision was still graded at 1 then it was reported as being of unsatisfactory quality. The terminology of overall judgement was less susceptible to the negative signalling of the earlier methodology. However the dominant way that the Council's reports would subsequently be used was not heralded at all in Circular 39/94. The overall judgement was significant if it reflected a Scale Point 1 for any of the aspects, but if this was not the case then attention would focus on the aggregate score for the six aspects. Since scores of 1 were very rare, the aggregated score soon became very important with 22 out of 24 widely regarded as the threshold for 'excellent' quality.

**Summary and the Relevance of an Economic Interpretation**

To what extent do the theoretical issues covered in Chapters 1 and 2 provide an explanation for the developments in quality assessment policy? The articulation of quality in Chapter 1 is central to the period under consideration. Although the relative quality concept inherent in quality assessment was no different from the commercial variant, the latter is market mediated while the former was evaluated by the HEFCE. Market mediation dispenses with costly estimates of quality – the customer decides
whether they wish to buy and firms respond appropriately or suffer the consequences via the loss of profitability\textsuperscript{46}. With HEFCE adopting the role of ‘agent’ for the various stakeholders in higher education the costs were inevitably going to escalate.

The first phase of quality assessment was designed to minimize costs by restricting institutional visits to those claiming excellent provision or where there were fears that unsatisfactory provision might exist. HEFCE’s intention to accomplish efficient scrutiny was laudable but naïve. The dyadic organizational structure of universities becomes relevant at this point. The interests of managers at both senior and subject group level in the university firm were congruent regarding the incentive to claim excellent when satisfactory would inevitably have negative reputational connotations. The drive to claim excellent would be encouraged by the fact that assessment was accomplished through documentation and episodic evaluation rather than the ‘real’ quality of what was delivered routinely. The informational difficulties inherent in these second order procedures served to emphasise the importance of signalling and the credibility of these signals, an issue that characterizes the whole policy process analysed in this thesis.

The development of universal visiting and the graded profile made the system more comprehensive but inevitably more costly. The generation of excessive documentation was predictable in terms of the game theoretic characteristics of the whole system\textsuperscript{47}. If assessment was to be accomplished in pre-announced episodes then university managers of the subject area, usually a head of department, has to decide on the appropriate strategy to be adopted. The term ‘strategy’ is particularly appropriate here because the situation constitutes a classic illustration of the game known as the Prisoners’ Dilemma.\textsuperscript{48}

\textsuperscript{46} Of course customers could get it wrong in a market mediated situation, but in this case firms would be driven to provide signals of quality prior to purchase including such devices as warranties, membership of trade or professional associations, information about the number of years that the firm had traded and so forth.

\textsuperscript{47} This game would also have been a feature of the ungraded assessment system but universal visiting simply increased the frequency with which it would be ‘played’.

\textsuperscript{48} The original format of this game will not be repeated here but the application to this thesis should, hopefully make its central features obvious.
In Figure 4.2, the rows represent the two strategies open to an individual subject area in University A, and the columns represent A’s perception of the same two strategies for Universities B-Z in that same subject area. The two strategies ‘Prepare’ and ‘Don’t Prepare’ are shorthand for ‘Take all measures possible to ensure that the highest assessment score is obtained regardless of whether they are typical’ and ‘Take no special measures other than presentation of required documentation which will be typical of normal practice’. In each cell University A’s perceived payoff is given in the bottom left corner and all other universities’ perceived payoff in the top right. The perceived payoff is

Universities B-Z

<table>
<thead>
<tr>
<th>Preparation</th>
<th>No Preparation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Preparation</td>
<td>Moderate</td>
</tr>
<tr>
<td>No Preparation</td>
<td>Best</td>
</tr>
<tr>
<td>Worst</td>
<td>Good</td>
</tr>
</tbody>
</table>

**Figure 4.2**

reputation enhancement. It is important to remember that payoffs are perceived rather than actual. What matters is what the decision taker thinks will be the case because it is this *ex ante* conception that determines strategy selection. If our University A’s subject decides to ‘Prepare’ then payoff is perceived to be moderate if everyone else prepares because it is thought more difficult for the assessors to differentiate. If other universities are perceived not to be preparing then University A will expect the best outcome as its preparations result in a higher score and enhance reputation relative to
other providers. If A regards the payoffs from no preparation these will be the worst possible if it thinks the rest of the sector is preparing and it is not, and ‘good’ if nobody prepares.

The outcome of this game is clearly going to be to Prepare because both perceived outcomes are better regardless of the perceived strategy of everyone else. Prepare/Prepare constitutes a Nash equilibrium. To some extent this stylized model can provide an explanation for the significant increase in institutions’ document generation but there are some difficulties that should not be ignored. The most obvious relates to the ‘true’ quality of University A’s provision. If the predicted outcome is dependent on true quality then the explanatory power of the game is diluted. It is difficult to resolve this conundrum. Both poor and good quality universities have an incentive to prepare, the first to cover up deficiencies and the second to proclaim their superiority. It does not appear that true quality would significantly alter the payoffs. The most problematic cell is bottom right. Here if there are no preparations by A or the rest of the sector, and A is a poor quality provider then its perceived payoff will be lower than ‘good’. If A is an excellent provider the outcome will be better than good. However none of this alters the superiority of the Prepare strategy because, regardless of the true quality of A, these payoffs are either superior, or no worse than No Preparation. Thus the game provides an explanation for the excessive documentation production under the quality assessment policy process. The Institution Focused Study (IFS) that preceded this thesis in 1999 sought peer group views on the assurance of quality and standards and in the distillation of the interview responses the strongest theme was that related to excessive documentation;

This process gets corrupted by the paperwork….quality assurance produces massive amounts of documentation which tends to dispense the obvious at very great length (IFS R4). …it’s the bureaucracy. Its just ensuring that you have the paperwork to back up what you as a professional academic see as your day to day role …Oh God! It seems like every day there’s more. …There doesn’t seem to be any time to stop and reflect, you’re constantly fighting paper. (IFS R4)

The game is a manifestation of a McCloskeyan metaphor in that it models the decision process of decision takers within universities and the predicted outcome
reflects the logic of the depicted payoffs when it is assumed that economic rationality pertains. The earlier account of the stages in the development of policy constitutes a 'story' interlaced with facts in the form of particular events and outcomes.
Chapter 5. Standards: HEQC and ‘Graduateness’

The Graduate Standards Programme

When the Secretary of State, John Patten expressed concerns in April 1994 about degree standards, the task of responding was given to the HEQC, the body ‘owned’ by the higher education institutions. Brown (1998) states:

The Secretary of State asked the Council to place more emphasis on broad comparability in the standards of degrees offered by different institutions, and made very clear the importance he attached to this (DES 1994). A few months later, in July 1994 the CVCP accepted the challenge. In a letter to Mr. Patten, Dr Edwards [Chairman of the CVCP] stated that: broad comparability of standards can best be achieved in a diverse system through assurance of threshold (minimum acceptable) standards; CVCP and HEQC will develop definitions of threshold standards and mechanisms for providing assurance about their achievement. (Brown, 1998, page 8).

When the HEQC responded to the CVCP request to evaluate standards it took a broader remit than that outlined in the CVCP Chairman’s statement above, and defined a three-fold strategy:

1. To focus more sharply on academic standards within the audit process by inviting institutions to indicate whether they had a corporate policy in respect of standards and, if so, to indicate how that policy was implemented, how its effectiveness was monitored, and the extent to which it was informed by measures to ensure comparability of standards with other institutions;
2. To investigate and consult on strengthening external examining;
3. To investigate and consult on the desirability and feasibility of developing threshold standards for first degrees (the Graduate Standards Programme or GSP) (HEQC, Nov.1996; Page 2, Para.5.)

The findings of the GSP appeared in two stages. In the Interim Report (HEQC 1995) the first stage findings were49:

1. the notion of comparability of standards, as hitherto understood, no longer commands general support;
2. in consequence, the concept of comparability needs to be redefined in the context of a large and diverse sector;
3. with certain exceptions, academic standards are generally implicit rather than explicit;
4. there is confusion and ambiguity in the titles of awards;
5. in fields where classified honours degrees are the norm... threshold standards are unfamiliar and tend to be defined in negative and residual terms. Standards in honours degrees rest on a notion of ‘satisfactory’ performance, usually pitched

49 The Report lists the findings with asterisks rather than numbers but here the latter facilitate identification in subsequent analysis.
somewhere in the second-class honours category. Hence students who are awarded pass degrees within an honours scheme (that is, who reach a threshold standards for a degree) tend to be regarded as having performed less than satisfactorily, but not so badly as to have failed;

6. establishing threshold standards will be difficult… at the level of broad subjects it does not appear to be feasible, although it may be possible at the level of sub-disciplines;

7. the possibility of agreement on the qualities expected of graduates, including generic attributes and skills, as a basis for threshold standards, is worth exploring;

8. across higher education there is an increasing desire to find ways of articulating the basis, standards and criteria for judgement associated with programmes of study in explicit and publicly-accessible terms….some educational developments have encouraged explicitness: e.g. modularisation, credit accumulation and transfer, and work based learning. (HEQC, 1995, para.18, page 6.)

The first finding appeared to indicate that English universities had different standards and secondly that such differences need not be matters of great concern. The second finding, that the size and diversity of the sector required a redefinition of the notion of comparability was significant because it implied that standards could not be comparable if institutions were ‘diverse’.

Findings 3 through 5 were statements reflecting respondents’ views on the current state of affairs with few normative implications. Finding 3 left open the question of whether standards were implicit because nobody has bothered to make them explicit or whether they were so because of an essential implicitness in the judgement process. Finding 4 was straightforward in the sense that the regulatory response was not inherently problematic. Findings 5 through 8 were an early statement of what has since become known as an outcomes based approach to standards.

Findings 5 and 6 were not a very hopeful basis for the establishment of a widely applicable threshold at the pass/fail level. Finding 5 acknowledged the fact that what might have been called the modal decision was actually within the second class category. Finding 7 moved away from academic standards towards generic attributes and skills and, not surprisingly, these were thought to be less problematic, while

50 Ibid. para. 18, page 6.
Finding 8 reiterated the need for greater explicitness even though the inclusion of academic standards would make this more difficult to attain.

These findings identified ‘diversity’ as the reason for the impossibility of ensuring comparability of academic standards but once again we are confronted with a term that was being articulated in two distinct ways. Diversity could have referred to differences in the learning opportunities that were offered to students in differently configured institutions. Different configurations could have referred, in the 'better or worse' sense, to different resource endowments, or alternatively simply have meant differences in the scope and mode of attendance of subjects offered with no implications of better or worse. Diversity interpreted in the latter sense was widely acknowledged and accepted. The considerable expansion in higher education via the creation and expansion of the public sector institutions between 1970 and 1992 was based on diversity of institutions but not on diversity in the academic standards of their awards.\(^{51}\)

Given this tradition it was difficult for the regulatory bodies to accept that academic yardstick standards as well as institutions could be ‘diverse’. This difficulty was manifest in the findings of the second stage of the GSP where prominence was given to a study which found that there were considerable variations in degree classifications both between and within subjects.

Following this evidence the Council emphasised the additional findings supporting the lack of support for the ‘notion of comparability.’ It is fairly clear that the HEQC was moving away from the comparability of the more traditional interpretation of academic standards (CNAA 1989) and were very much aware of the significance of this movement:

> It is important that this finding [i.e. lack of comparability] is correctly understood. It does not entail that standards have ‘fallen’, or for that matter ‘risen’, or are otherwise insecure. The GSP has not reported on such an issue, nor was it asked to investigate it.... The aim of the GSP has been to contribute to ways in which higher education

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\(^{51}\) Comparability of standards between polytechnics and universities was the touchstone of the CNAA’s Charter.
collectively might address clarity, security and comparability of standards in the context of a large and diverse sector....Comparability has become implausible because there are now no agreed and widely understood parameters with which to chart similarity or dissimilarity. (HEQC, Nov.1996; Page 8, Paras.23 and 24)

Thus although the Secretary of State asked the CVCP to ‘give greater attention to broad comparability of standards’, the HEQC denies that this amounts to a request to find out why, or indeed if, academic standards have fallen or risen. HEQC was clear however, that greater attention to broad comparability had resulted in the finding that if the focus was on academic standards, there was simply no reliable mechanism to assure comparability.

The theory of the trust good set out above defined professionalism in terms of the informational characteristics of the service. The HEQC provided an elegant restatement of the nature of professional judgement;

Judgements of academic standards are, by their very nature, ultimately rooted in the shared (and often tacit) values of a specialist academic community because they generally derive from expert practice that is only possessed by that community. Nevertheless, a substantial element of explicitness of aim and outcome is required if students are to appreciate what is expected of them, employers are to be clear as to what a qualification signifies, and staff are to ensure that they employ the most appropriate means to facilitate and assess students’ learning. (HEQC, Nov.1996; Page 9, Para.8)

Although professionally-based judgement is acknowledged, HEQC’s subsequent work was to focus on a more generic approach to learning outcomes.

**Generic Attributes and Skills**

There was nothing particularly new in acknowledging that generic attributes and skills were an important outcome of higher education. The impetus for specifying these outcomes in a more systematic and differentiated way was a consequence of the advent of mass higher education:

The paradigmatic employment expectation for graduates at the time of Robbins was entry either into academia or into work at a high intellectual level in the public service or industry. For such posts, the development of what Robbins called ‘general powers of the mind’ would usually be as important as...a grounding in a specific
knowledge and skill base. This situation influenced the understandings, often only implicit, both in and outside the academic world about the 'standards' of degrees.

In a mass HE system the paradigmatic employment expectation may well be rather different. The proportion of graduates entering what might be called academic... jobs has reduced sharply.

(HEQC, Nov.1996, paras. 4.4 & 4.5., page 66. Emphasis added)

Thus under Robbins the general powers of the mind were a highly valued complementary outcome to subject knowledge but it was not necessary to be more specific because an elite constituency of graduates and employers had a shared understanding of what these were. The mass system necessitated more specification and the form of specification could relate to ‘learning outcomes’.

The HEQC acknowledged that the extent to which generic attributes and skills could be specified as outcomes would vary from subject to subject.

Science subjects emphasised the range of practical experience, the ability to apply knowledge and understanding to solving problems, and the need for up to date knowledge, based on an awareness and understanding of current research. The arts and humanities were more inclined to highlight the ability to tackle problems involved in the study of their discipline for example interpreting diverse phenomena, making historical and comparative judgements, and probing epistemological and philosophical issues, values and contextual factors.

(HEQC, Nov.1996, page 36, para.11)

Not surprisingly this link between the articulation of generic attributes and a particular subject led to obvious difficulties where the subject was less easy to define:

Within a complex modular system, it was argued, ensuring the achievement of a common set of graduate attributes was not straightforward, with the consequence that some form of integrative or synoptic assessment of generic abilities might be desirable, to supplement the assessment of individual modules. (HEQC, Nov.1996, page 11, para.40)

On the issue of ‘skills’ there was obviously a more straightforward link to the practice based subjects such as engineering and medicine, a link facilitated by the involvement of professional associations. Nevertheless even where a subject was not overtly linked with practice there was seen to be some benefit in developing relevant skills.

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There was initial optimism that a degree of similarity existed between different subjects:

The work found that examiners used remarkably similar language to characterise the qualities sought in their assessment practices, not merely within a particular subject but across each of the four different subjects studied. It might seem therefore that the project went a long way towards confirming a view there exists something called ‘graduateness’ which can be seen as common to all degree courses; and that levels [including a threshold level] could be defined in terms of these qualities and skills. (HEQC, Nov.1996, page 18, para 77)

but this turned out to be illusory:

In fact matters were more complex. The project found that the common vocabulary that had been observed was not used to describe the same attributes in each case. What is more, no strong grounds were found to confirm that the criteria and judgements used to assess students are common to different subjects. (HEQC, Nov.1996, page 18, para.78)

It was clear then that the desire to conceive of ‘graduateness’ in terms of generic qualities and skills, had opened up a number of issues associated with what might be called a ‘fine grain’ approach to standards. However this approach was also bedevilled by problems of assessment. It would appear that the difficulties of assessment militated against determining different levels of attributes and skills. To be sure attributes and skills were assessed within subject boundaries, but this offered little consolation if the search was for a truly generic variety across boundaries. A version of ‘graduateness’ which was subject bound was not much of an improvement. Thus if it was difficult to assess different levels of ‘attribute-attainment’ it was understandable that HEQC turned to just one level – that of the threshold.

Developing a Convention for Degrees and Other Award Titles

The HEQC’s discussion of conventions relating to titles was, in strictly conceptual terms, the least problematic and in consequence was the shortest section of this part of the Report on graduateness. The proliferation of sometimes confusing titles at undergraduate and postgraduate level was acknowledged to be a direct consequence of the dynamic and changing environment in the HE sector.
The research that underpinned HEQC's work confirmed the findings of the influential HEFCE-CVCP-SCOP Review of Postgraduate Education [the 'Harris Report'] which:

Provides further evidence of inconsistency and confusion in the nomenclature of postgraduate awards and provides corroboration of the Council's findings. Its recommendations for a typology of postgraduate courses and for moves towards the standardisation of course nomenclature suggest avenues worthy of exploration for awards at other levels. (HEQC, Nov.1996, Page 23, paras. 103-104)

In economic terms the imposition of a more standardised classification of titles had public good characteristics. Everyone benefited from the clarity of information but if left to themselves institutions would generate inadequate amounts of the good.

**Strengthening the External Examiner System**

The Council published its findings on external examining in the form of a framework which would;

..provide a consistent national approach to external examining, while maintaining sufficient flexibility within and across institutions. (HEQC, Nov.1996, page 23, para. 105)

This framework embodied a set of 'core expectations' – four relating to the examiners themselves and one to the institutions. External examiners should:

1. Provide assistance to institutions in the calibration of academic standards through the review and the evaluation of the outcomes of the assessment process; and the moderation of pass/fail and classification boundaries.
2. Be involved in the review, evaluation and moderation of examinations and other assessment instruments and practices.
3. Be members of, and attend, the appropriate examination boards, or assessment panels, to ensure fairness and consistency in the decision-making process.
4. Present a written report to the head of the institution... which includes commentary and judgements on the validity, reliability and integrity of the assessment process and the standards of student attainment. (HEQC, Nov.1996, page 24, para. 107.)

These expectations conformed with a traditional conception of the role of external examiner. There were two issues worthy of comment, one which extended the traditional role and one which reduced it. The second expectation regarding the review of assessment instruments and practices was a relatively recent development, casting the external as an active consultant in the institution's reflective process. The
first expectation referred to the outcomes of the assessment process but did not refer specifically to whether, for example, the material covered made appropriate intellectual demands on the learners. It was possible that 'outcomes of the assessment process' were conceived in such a broad way that they included judgements of this type.

The HEQC acknowledged however that numerous pressures were making it difficult to maintain this traditional role, that the influence of external examiners had declined and should be redefined and strengthened. However the precise nature of the redefinition and strengthening process is difficult to discern in the Report. The most specific proposal was to strengthen peer group perceptions of standards by increasing the opportunities for externals to meet in various subject based fora.

Identifying Threshold Standards
At the beginning of this chapter it was shown that when the CVCP endorsed the HEQC's task of promoting 'broad comparability of standards' in 1994, it was done in the context of threshold standards. This was significant because comparability referred to the standards embodied in the traditional honours degree, with little emphasis on the pass/fail decision. Thus even though the Report stated that honours degrees were being taken by 80% of all HE students there appeared to be a remarkable degree of enthusiasm for the development of a 'binary' standards system that appeared completely at odds with existing professional practice.

If the focus was on subject based knowledge then there was an obvious danger that graduateness could have been seen as a new word for appropriate academic standards and little was gained. However graduateness was closely interlinked with the notion of a threshold standard that was seen by the HEQC as rather different from the dividing line between the various bands of the classified degree. Thus the threshold standard was written in the singular and was seen as something that all graduates aspired to if graduateness was to characterize their education\(^\text{53}\).

\(^{53}\) For a comprehensive survey of the nature and purpose of threshold standards see Smith \textit{et al}, 1999.
The problem that now immediately presented itself was the possibility of exclusion. If the threshold was seen in modal terms as somewhere in the lower second category, then third class or pass degree candidates were deficient in their standard of graduateness. For this reason the threshold standard must be deemed to have been reached when the decision was made to award a degree regardless of class. It is not surprising then that the Council’s discussion of a threshold standard also reflected some uneasiness with the whole idea of honours classification.

Conclusions and the Link with an Economic Interpretation

The Graduate Standards Programme reflected a collective effort by the universities to respond to a political instruction by the Secretary of State. The notion of graduateness was necessarily a generic one, and the pursuit of generic skills and competencies involved a new perspective on the role of higher education in a period of widening participation. Not surprisingly the participants in this debate displayed a strong commitment to education qua education and began an important campaign to raise awareness of the significance of curriculum as a matter worthy of study in its own right. The ‘developments that encouraged explicitness’ (about standards) are the same developments that Barnett (1997) was concerned with when he stated;

...there is a growing sense that the largely passive assimilation of prepositional and discipline-based knowledge is insufficient as a means of generating a worthwhile higher education experience and that knowing-in-action has to be systematically incorporated into the curriculum. (Barnett (1997); page8)

The difficulty with the generic approach to standards and the work of the GSP is that it did not seem to address the issue that the Secretary of State was originally concerned with, namely academic standards as traditionally conceived. Raising the issue of academic standards in 1994 went against the grain of contemporary higher education policy which was only two years into a new focus on quality assurance. This discontinuity raised issues which were not capable of being explained by the policy texts themselves and for this reason were the subject of interviews with participants in the policy process at the time.
When asked whether the GSP was a response to what John Patten really meant by ensuring broad comparability of academic standards a senior officer of HEQC replied; 'No but I duped him. The GSP was a very ambitious programme and even if you could do it there was no guarantee that the sector would buy it but I bought some time’ (R4). A second respondent emphasized the sudden impact of Patten’s request and the possible longer term damage done to the HEQC; ‘At the time HEQC was developing the theme of ‘Managing for Quality’ – quite suddenly the agenda switched to graduate standards...It was deeply embarrassing – there was disagreement and a lack of theorizing on standards...I think there was a feeling that the HEQC response was not really satisfactory. The GSP was more about the nature of higher education in general than the standards of awards. Its difficult to tell whether there’s any relationship between this (HEQC response to Patten) and the collapse of HEQC’ (R1).

The HEQC was certainly put in a very difficult position by the sudden concern for academic standards because as has been shown above, it occurred at a time when its own consultations had just shown a weakened belief in the broad comparability of standards. Moreover John Patten had, earlier in the same year, reiterated his belief that institutions bore individual responsibility for their academic standards. The concept of graduateness was the first move toward the representation of standards as a search good. Although the Secretary of State stressed institutions’ responsibility for their academic standards, concern for their appropriateness was leading to an expectation that there should be a wider sectoral response to what was becoming a problem caused by the increased level of competition between institutions.

The tension between competition and the need for institutions to jointly provide an infrastructure for the articulation and assurance of standards is a powerful example of inefficiency through inadequate market provision of goods which embody positive externalities, in this case infrastructure provision. The buying of time referred to by the HEQC officer above, reflects the difficulties facing the HEQC within the dual
agency structure of the time. Owned by the universities, the HEQC was not well suited, or well placed to set up a robust system for the maintenance of yardstick standards when the focus of the universities was on obtaining high scores in the HEFCE’s quality assessment of subject areas. The establishment of infrastructure would take another six years when the two agencies were replaced by the QAA.

The dominant rhetorical forms of the economic interpretation of this chapter have been the story of the HEQC’s response to the task it was given and the facts embodied in the textual representation of this response. The emergence of concern for academic standards has been related to competition between institutions. The metaphor embodied in the economic model of competition has an internal logic which predicts attendant economic inefficiency associated with information asymmetry and externalities.
Chapter 6: Standards: The QAA and Quality Assurance by Pronouncement

Introduction

This Chapter analyzes the regulatory regime for higher education following the disestablishment of the HEQC and the QAA's emergence as the 'single agency' for the regulation of quality. This regime posited a change from subject to academic review with the latter reflecting a 'lighter touch' leading in turn to lower institution and Agency costs. Teaching quality assessments would end, as review focused on outcomes rather than processes that led to those outcomes. Embodied in this change of approach was the blurring of the distinction between institutional and subject review.

The Dearing Report

Academic Review emanated directly from the Report in 1997 of the National Committee of Inquiry into Higher Education [NCIHE] chaired by Sir Ron Dearing. Under the heading 'Qualifications and Standards', the Report outlined the role and responsibilities of the new Quality Assurance Agency for Higher Education. There were to be:

...three main functions for the Quality Assurance Agency:
1. quality assurance and public information;
2. standards verification;
3. the maintenance of the qualifications framework. (NCIHE, 1997, page 161, para.10.38)

The first function related to two inter-related aspects – the programme specification detailing what was being provided, and secondly codes of practice relating to the way that institutions provided it.

The focus of the two aspects was different. The codes of practice related to institutional processes and derive from the HEQC’s earlier concern with institutional audit while programme specifications related to courses of study and embodied a
concern that the fullest information be provided to students and external stakeholders about the ‘intended outcomes’ of provision.

Referring to standards verification the Report stated;

This function will involve the Agency in providing mechanisms for programme outcomes to be identified, and managing an enhanced external examiner system. We have already proposed the establishment of formal groupings of academics to identify expectations for awards and achievements at the threshold and highest end of the spectrum for different types of programmes. (NCIHE, 1997, page 161, para. 10.91)

The above statement reflects the view that ‘standards’ can be specified albeit with the help of the professional peer group. The peer group has two roles; the ‘formal groupings of academics’ would undertake a new role of benchmarking standards while the ‘enhanced external examiner system’ was a development of a role that already existed.

In addition to removing the responsibility for the appointment of externals from universities, the Report also emphasized the need to expand their role well beyond the traditional one of assuring the maintenance of academic standards and justice to individual candidates. What is particularly surprising about this proposal is that it coincided with a view throughout the higher education sector that the traditional and more limited role of the external examiner was under threat from the sheer burden on existing members of the profession.

The final piece in the Dearing policy on quality and standards is the recommendation that the remit of the QAA be amended to include maintenance of a national qualifications framework. Such a framework would enable diverse provision to be better understood by ‘external’ stakeholders particularly as it linked directly with the Agency’s task of assisting institutions to;

...credit rate all their programmes, and then develop and operate the Credit Accumulation and Transfer [CAT] Scheme. (NCIHE, 1997, page 163, para. 10.96)
The Agenda for Quality

The ‘launch’ of the QAA’s detailed response to the Dearing Report’s recommendations was entitled ‘An Agenda for Quality’. ‘Quality’ is here being used as an umbrella term to encompass both quality assurance and standards. The Chief Executive of the Agency:

...sets out for consultation the Agency’s agenda for quality based on the Dearing proposals. The Agency will work with the institutions and other stakeholders to provide public assurance on the quality and standards of higher education. In so doing it will define:
1. A framework for qualifications and awards at all levels of higher education;
2. threshold standards relative to that framework across all subject areas;
3. guidance to support institutions in providing clear specifications for each of the programmes they offer;
4. codes of practice designed to secure the quality of the student learning experience within institutions;
5. the public information that should be available to meet the needs of all stakeholders.

Quality will be assured and enhanced by:
1. reviews of institutional systems for safeguarding the quality of provision and the standards of awards;
2. reviews of programmes in all subject areas, to measure the outcomes they achieve against relevant threshold standards and the objectives specified for the programmes;
3. promulgation of good practice. (QAAHE, 1998a, Page 1.)

This agenda was complex and demanding but was a logical development of the work done by the HEQC and the HEFCE.

The Registered External Examiner

This traditional role for the external examiner was thought by both Dearing and the QAA to be still valid, but in urgent need of reinforcement (Silver et al 1995). The Dearing Report quotes evidence given to the Commission by the HEQC:

Essential aspects of the academic infrastructure that used to support confidence in shared standards have been undermined, with resulting problems of understanding for students, employers, research councils and academics themselves, since the existing frames of reference no longer match reality. (NCIHE, 1997, Para. 10.58, page 155)

The undermining of the infrastructure supporting shared standards was implicitly rather than explicitly stated in the Dearing Report. For this reason it is difficult to pinpoint exactly what the issue was. It was true that there had been a significant expansion in the overall size of the higher education sector but it is not clear a priori
why an expanding sector had not generated a proportional increase in the number of qualified academics who could perform this function.

Dearing’s misgivings may have arisen from another source linked with the ‘diversity’ of the expanded sector so that even if the number of externals existed, they would have a more difficult role in developing a shared understanding than their forebears in a smaller more tightly knit network. Whatever the precise reasons for the problem there was a strong view that the higher education system of professional judgement exercised by peers has not developed in a sufficiently robust way to assure standards.

Dearing identified two possible alternative remedies; the US/Japanese system of relying on ‘an informal ranking of institutions’ or the Australian system of expert panels of academics to ensure that the class of honours degree should signify something similar for an award in the relevant field by any of the Australian universities….we have been impressed by the approach that has been attempted in Australia, and share the view that there is advantage in awards reflecting a national approach to standards. (NCIHE, 1997, page 155, paras. 10.61 & 10.62)

Thus it would appear that where there were concerns relating to the standards of awards, the cause was a lack of knowledge about what should be the common standards across the sector. The QAA’s response to the Dearing recommendations was initially to place external examining at the heart of its quality assurance system and the Agenda for Quality;

considers the Dearing proposals for strengthening the external examiner system and for developing an extended role that some external examiners – the registered external examiners [REEs] could play in assuring quality and standards…..The REEs would have a reporting relationship with the Agency as well as with the institutions [original emphasis]. (QAA,1998a, page 15)

Dearing recommended that the QAA should strengthen the existing external examining system and the creation of a UK-wide pool of examiners. However when the QAA moved to implement this policy it was clear that the ‘pool’ was to be differentiated.

In proposing an extended role for some external examiners, there is no intention to dispense with the current external examiner role [emphasis added]. (QAA,1998a, page 15.)
In this initial QAA response to Dearing, the REEs clearly had a pivotal role in the new system of academic review that was to replace subject review. Given this pivotal role it was surprising that REEs were the first casualty of the consultations between the QAA and the sector. It was always going to be extraordinarily difficult for the QAA to deliver on Dearing’s recommendation relating to external examiners. The recommendation struck at the heart of the closely related issues of the traditional autonomy of English universities and peer group responsibility for the maintenance of academic standards. If the QAA had to exist to provide assurance on standards, then university status per se no longer provided such a guarantee.

Even though the REEs were an early policy casualty, the newly created academic reviewers would still regard external examiners’ reports as credible information in the standards monitoring process. This brings us back, once again, to an inconsistency in the QAA’s view on the ‘health’ of the whole external examining system. The ‘traditional’ externalising process was supposedly creaking under the sheer weight of an expanded HE sector but, even so, they would be given wider responsibilities to act as critical friend and consultant as well as reporting to the QAA on outcome standards.

The Standards Agenda
Between 1998 and April 2000 when the new academic review method was unveiled the wording of Higher Quality indicated a change of focus from ‘An Agenda for Quality’ to ‘The Standards Agenda’ which was presented in the form of the schematic reproduced in Figure 6.1. below. The schematic identifies the QAA conception of standards as a positive function of programme specifications that have an appropriate content and format, that link with referents from subject benchmark statements with a clear relationship to the national qualifications framework. Academic review was part of the process for confirming that provision at a given institution conformed to this pattern.

54 QAA [13-14 April 2000] National Conference on Quality, University College Swansea; presentation by QAA Officer Julie Swan.
At the heart of this conception of standards was the conviction that the specification of 'intended learning outcomes' at both unit and programme level, together with the subsequent assessment procedures for confirming their attainment, was necessary for unambiguous assurance. If this system was successful then it would achieve the desired outcome of making academic practitioners truly accountable for their work by converting the higher education service from a trust good into a search good.

Implicit in the above contention is the view that standards were under threat because stakeholders did not have a sufficiently detailed explanation of what higher education was designed to do. Earlier regimes that focused in turn on inputs and processes were 'producer' orientated and would now have to give way to more robust indicators of outcomes. However everything still depended on whether such outcomes were robustly assured. This would depend on the signal credibility of such outcomes; merely specifying them, and pronouncing that they have been attained would not be enough. Before this could be decided there was a need to put more flesh on the bones of the triadic conception summarized in Figure 6.1.
Programme Specifications

The point has been made that commercial quality assurance systems require product specification before assurance can be systematized. Unless you know what you’re supposed to be doing, you can never be certain that it is being done. Programme specifications contained the intended learning outcomes of the programme, the teaching and learning methods that would enable learners to achieve these outcomes, and the assessment methods used to demonstrate achievement. They would also detail the relationship of the programme and its elements to both the relevant subject benchmark statement(s) and the National Qualifications Framework.

The QAA trialled a number of templates for programme specifications and this exercise informed a sample specification appended to the edition of Higher Quality that contained the ‘Agenda’ referred to above. In some respects this specification contained information that had long been part of normal higher education practice, usually taking the form of definitive course documents. The CNAA procedures certainly required a high level of specificity in the detail prepared for visiting approval panels and this tradition continued. However there were important differences.

Definitive course documents were designed to be read and discussed by the suppliers of the higher education service and they focused on the substantive content of the programme and its constituent parts. Programme specifications were designed to be read and discussed by the consumers and stakeholders as well as the suppliers. Moreover the presentational templates emphasised that, while subject based content was important there was also a need to specify additional competences and skills that would enhance the employability of graduates.

The presentational guidance given by the QAA, particularly relating to the length of the programme specification was important. If the specification was too long it

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55 This sample is appended below.
increased the transactions cost of use particularly by the external audience. However the ‘two sides of A4’ suggestion was just that, and QAA ‘trainee material’ for the mythical University of Wessex went well beyond the stipulated two sides of A4. Now it was certainly true that documented programme material would always be extensive; curricula vitae and unit/module descriptions were a standard part of these documents but unless the length of the specification itself was strictly defined the ‘prisoners’ dilemma’ outcome set out in Chapter 3 would reappear where providers guard against insufficiently comprehensive details in validation and review events. It is significant that the QAA was highly prescriptive about the word limit for self-assessment documents for subject review, but less so for institutions’ documentary responses to its wider policy. This was almost certainly a result of the need to guard against the accusation of undue compliance and standardization, but without standardization the benefits of a common approach for external stakeholders would be jeopardized.

The heart of the learning outcomes approach to quality assurance was the *ex ante* ‘pronouncement’ of outcomes coupled with their assessment *ex post*. The learning outcomes were pronounced at programme and unit level and the link between them was a crucial element in the evaluation of programme integrity. In other words if a programme outcome was not manifested in unit outcomes there were going to be difficulties.

The statement that an experienced academic could set out an appropriate programme specification in three to five hours did not *guarantee* that such a specification was a credible indicator of appropriate academic standards. Pronouncement would have to be followed by something else relating to the level of the work that learners would accomplish. Ascertaining level is never straightforward. The operational aspect of the learning outcome approach requires, as has already been said, a rigorous link between outcomes and assessment. To guard against the failure to assess any given outcome
requires that it be specified in a sufficiently generic way. This then raised the problem that generic outcomes might be too vague to assure standards. 

**Subject Benchmarks**

In its preface to each of the subject benchmark documents the QAA stated;

Subject benchmark statements provide a means for the academic community to describe the nature and characteristics of programmes in a specific subject. They also represent general expectations about the standards for the award of qualifications at a given level and articulate the attributes and capabilities that those possessing such qualifications should be able to demonstrate. (QAA, 2000a)

Subject benchmarks were supposed to ensure that the content of programmes did not depart too much from peer group accepted norms for a particular subject. This process depended on the existence of such norms. Shared knowledge was easier to obtain for traditional single honours subjects (Becher in Brennan et al 1997), and although it was a little more difficult to obtain for joint honours the problem was not insuperable. However when the move was made to modular programmes and ‘partnership’ schemes where learners compiled their own programmes, difficulties abounded.

The QAA was also faced with another dilemma. If the benchmarks were specified in too much detail then it would be accused of driving the sector towards a national curriculum with attendant accusations of constraining diversity and innovation. If the benchmarks were too generic then benchmarks would become less credible.

The credibility of benchmarks was affected by factors other than the singularity of the subject. Those subjects which have a strong practitioner base such as medicine and engineering are more amenable to the credible specification of what a typical graduate is able to do on completion of the programme. However subjects such as art, design and the Humanities are more redolent of ‘connoisseurial’ outcomes and a shared understanding of competences is more problematic.

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56 Programme designers at the writer’s university are advised by QAA trained assessors not to specify outcomes in syllabus specific terms lest the assessment regime fails to test them.
The subject benchmark statements were at the heart of the regulatory attempt to assure the academic standards of awards. All statements described the threshold outcomes for obtaining a degree in a given subject and most went on to specify the typical ‘modal’ performance of graduates. They were comprehensive in terms of the scope of the work that would be covered but less so in terms of the ‘vertical’ differentiation in ability. For example the Economics statement specified that at the threshold level a graduate should demonstrate knowledge of economic concepts and principles while at the modal level they should demonstrate understanding of economic concepts and principles. This was quite a reasonable distinction to make but it could be taken to reflect an implicit assumption that there was no shared view of the distinction between threshold and modal level. However it is possible that the real difficulty related to the assessment of a given candidate and whether the stated distinction made above was correctly applied in a particular case.

**The National Qualifications Framework**

If programme specifications identified the outcomes of individual courses, and benchmark standards confirmed that such outcomes were at the appropriate level, the final part of the quality ‘triad’ was the way that the resulting qualification related to those of other higher education institutions. The National Qualifications Framework [NQF] was designed to do so.

The NQF was identified in relatively detailed terms in the Dearing Report which confirmed that:

- The main elements of the framework will be:
  1. standardized nomenclature for awards;
  2. agreed and common credit points at relevant levels;
  3. the inclusion of additional and recognized ‘stopping off’ points. (NCIHE, 1997, page 151, para.10.44)

The desirability of such a framework was not contested within the higher education sector. The HEQC supported a greater level of consistency as did the Committee of Vice-Chancellors and Principals (CVCP). There was also an important international
dimension to the development of the framework and the HEQC was commissioned to produce a Report to analyze this. The essence of the Report was that UK awards were not seen as 'national' awards because they were awarded by individual institutions, a UK-wide framework would lessen some problems of international recognition and finally the length of time taken to obtain a qualification would still be seen as a credible indicator of quality and standards.

The awarding of degrees by individual institutions is a particularly important part of English higher education, indeed degree-awarding power is an indicator of the status of the institution and an acknowledgement that it is a fit and proper place to be trusted with such power. However, as with other aspects of quality policy, trust was seen as an unsatisfactory mechanism for reassuring the relevant stakeholders. A national framework would certainly lessen problems of international recognition where such problems were caused by, for example, the proliferation of different titles for similar programmes. However it is difficult to see how, a priori, a national framework would do anything to assure academic standards. The pronouncement that a programme leads to a Bachelor of Arts with honours in economics is not, of itself, a credible indicator that appropriate standards pertain.

In some continental European countries the fact that awards are national rather than institutionally based provides a higher level of assurance. If an institution is fit to award a national qualification it is because it has been formally accredited to do so. Formal accreditation is a high credibility/low trust assurance mechanism but it was not a characteristic of the different environment that existed in England where institutions had more autonomy.

Four Undergraduate Years

The Dearing Report and the early versions of QAA proposals on the structure of the undergraduate curriculum advocated four years from entry to the award of an honours degree. Such four year programmes were the norm in Canada, Australia, New Zealand, the United States, mainland Europe and Scotland. The argument that three
years was sufficient when the higher education participation rate was relatively low, but far less so when widening access was an explicit aim of policy.

A four year undergraduate curriculum had significant advantages in the assurance of quality and standards. HEQC had earlier highlighted the problem of a non-honours degree being regarded as a failure within the English system. The resulting distinction between 'graduateness' and honours classification was neatly accommodated when a degree was awarded after three years and an honours degree after four. The four year structure offered the advantage that those who wished to pursue a more general set of units in their early undergraduate years were able to do so without being regarded as incapable of more rigorous specialism later. Four years offered a sequence of nationally recognized exit awards appropriate to the level of study namely; Certificate, Diploma, Bachelors degree, Honours degree. This system was more suited to a diverse intake where there is more scope to progress at a chosen pace because the greater ease of temporary exit reduces the sunk costs of doing a less 'divisible' degree.

The above advantages were essentially structural and linked to the quality of the student's learning experience. What of the link with academic standards? The Dearing Report stated:

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It is fundamental to our approach that awards should be based on achievement rather than on the length of study required. (NCIHE, 1997, page 152, para 10.52)
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In some respects this assertion was inconsistent with the proposal to extend the length of the undergraduate programme to four years. Dearing expressed:

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...concern that enrolling most students on to degree programmes as the terminal qualification - rather than offering recognized stages of achievement along the way - could result in failure rather than success for many students as higher education expands. (NCIHE, 1997, Page 148, para.10.30)
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Although the logic of this argument was clear there was some doubt as to whether it accorded with the facts. The main debate in higher education in England did not focus on the prospect of a higher wastage rate as access was widened. Within the Dearing
Report the debate was about the standards and quality of awards that were made in an environment when higher wastage rates had implications for funding.

Once again we return to the financial constraints within which institutions operated and the existence of completion and progression rates as performance indicators. The four year structure offered a way of widening access without the risk of threatening standards of honours programmes. The argument being made here is not to advocate a large cohort of students that will never get beyond the three year bachelors degree. Rather it is that when access is widened there is a higher probability that more students will benefit by an additional year in which to reach honours standard.

A Credit Rated Framework

The public good properties of infrastructure provision mean that although widely accepted as beneficial, they will be subject to underprovision in a market system. The NQF promised strong infrastructure improvements and one of the strongest of these was the institution of a credit system.

The benefits of credit rating had been accepted for some time. The CNAA had a detailed proposal on the matter and much work was subsequently achieved by the HEQC. Thus the Dearing Report could state:

...there was widespread support for the credit rating of all programmes and for the introduction of a national Credit Accumulation and Transfer (CAT) system... The support for credit systems ranged beyond the higher education sector... the weight of opinion is that a credit-based approach is the right way forward. We agree and support such an approach to underpin a framework of qualifications. (NCIHE, 1997, page 149, paras. 10.37 & 10.38)

The benefits of a comprehensive CAT system were many but such a system was never going to be implemented quickly. It was accepted by Dearing that transfer was the more difficult aspect and institutions would continue to have the discretion to decide whether credits awarded elsewhere would be acceptable on specific programmes. Notwithstanding the difficulties of relating credits to the level of work, there were still important benefits to be obtained by using credits as a way of
specifying programmes and as an indicator of the accumulating volume of work by individual students.

The QAA used credits to define awards in the early consultative drafts of the NQF. There was nothing particularly surprising about this since, as was argued above, there appeared to be well founded expectations that the principle of CAT would be accepted by the sector. The credit definition of awards [as opposed to the fourth year] was not contentious for undergraduate programmes but was more problematic at the postgraduate level which is detailed in Appendix 4.

In Table 6.1., Documents 1 and 2 are for consultation prior to the consequent policy contained in Documents 3 through 5. The changes between these two phases of policy development in England, Wales and Northern Ireland are profound as both the fourth undergraduate year and the credit rating of qualifications were dropped.

Table 6.1. QAA Policy documents relating to the development of the National Qualifications Framework

<table>
<thead>
<tr>
<th>Document</th>
<th>Description</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document 5.</td>
<td>The framework for qualifications of higher education institutions in Scotland</td>
<td>January 2001</td>
</tr>
</tbody>
</table>

In Table 6.1., Documents 1 and 2 are for consultation prior to the consequent policy contained in Documents 3 through 5. The changes between these two phases of policy development in England, Wales and Northern Ireland are profound as both the fourth undergraduate year and the credit rating of qualifications were dropped.

Document 1 contained a comprehensive credit definition of awards which conveyed important policy markers for both level and volume of provision. To some extent the
abandonment of credit rating in the policy Documents 3 and 4 made the above arguments less significant but they did not disappear because the QAA’s NQF for Scotland [Document 5] retained credits thus allowing for what Universities UK calls ‘read-across’.

The QAA maintains that the NQF:

...is a qualifications framework, based upon the outcomes represented by the main qualifications titles. It is not a credit framework, nor is it dependent on the use of credit.[emphasis in original] (QAA, January 2001, page 6)

Thus the ‘widespread support for the credit rating of all programmes’ noted by Dearing had not been strong enough in England to enable the QAA to base its NQF on such a system. The failure to adopt a full credit rating of all programmes removed one of the few devices for specifying the standards of qualifications and it meant that these standards were now dependent entirely on the specification and assessment of outcomes with ‘process based’ indicators of level having no purpose. In economic terms we were faced with a production function where output was not specifiable in terms of the inputs involved. Thus the QAA asserted:

The outcomes associated with a qualification should be understood in a holistic way and their achievement should be demonstrated directly......It is the assessment of outcomes of learning that is important rather than the nature of any component element of study. [emphasis added]. (QAA, January 2001, page 7)

Notwithstanding the confidence placed in the credibility of learning outcomes, the NQF had at its disposal, process based indicators of both volume and level:

The design of academic programmes has to make some assumptions about the amount of learning that is likely to be necessary to achieve the intended outcomes. In some cases this will be expressed in terms of study time, for example a number of years. In other cases this will be expressed through credit rating.

(QAA, January 2001, pages 6 & 7)

Thus the QAA eschewed prescriptions about time or volume of credits. The maintenance of standards was entirely dependent on the pronouncement of learning outcomes in the form of qualification descriptors. The commonality of these descriptors throughout the sector was de facto the contribution of the regulatory agency.
The standards agenda was an implicit indicator of concern about yardstick and achievement standards of English awards but at the micro level there was more explicit concern that standards were falling;

I see standards as the metric for quality and I think that standards have fallen. I see our attempt to construct standard systems as suggesting that our traditional system has failed (IFS R7). I get more and more confused by what standards mean and we are under enormous pressure to let people through (IFS R4). We’re looking at standards nationally and internationally with concern that the British system may be sinking into the sea (IFS R9)

Summary and Link with an Economic Interpretation

The ‘standards agenda’ that the QAA used to implement the Dearing proposals was based on a triad consisting of programme specifications, benchmark statements and the NQF. In terms of the analytical framework of this thesis, the standards agenda constituted an attempt to present the higher education service as a search good rather than a trust good. By providing more information ex ante, the presumption was that such specification would also make the institutions accountable for its delivery ex post. This link between ex ante specification and ex post realization glossed over the informational characteristics of a trust good, the essence of which is the impossibility of credible ex ante specification.

Since the analytical framework identified trust as the defining feature of professionalism, the QAA’s specification exercise was designed to de-professionalise higher education. Between 1997 and 2000 when the standards agenda was being devised, the system of quality assessment was in all important respects the one that was introduced in 1992 and modified in 1995. This system was based explicitly on the view that standards were the responsibility of the institutions rather than the regulatory agency. Quality assurance by specification and pronouncement would externalize the responsibility for academic standards.

It is not difficult to see the tensions that such a system would engender in the dyadic university firm. If universities were going to respond to the need to specify, the agents
for doing so within the institutions would be senior and local members of the management hierarchy who had an obvious incentive to ensure that documented systems reflected this new orthodoxy. The academic peer group on the other hand, stripped of the responsibility of providing a trust good would be required to comply rather than willingly co-operate. This is far removed from the organizational architecture posited by Jensen and Meckling as being necessary for the successful implementation of quality management systems where incentives, decision rights assignment and performance evaluation systems are congruent.

Finally the concern to clarify and strengthen the infrastructural elements of higher education reflects an attempt by the QAA to enhance the efficiency of the system. Elements such as credit rating, agreement of four year programmes and a national qualifications frameworks would have been underprovided if the institutions had been left to their own devices because these elements reflects external benefits within the system. Thus the drive for a search good representation of provision and the provision of infrastructure reflects an attempt to combat the effects of economic inefficiency derived from the two forms of market failure known as information asymmetry and externalities.

The methodological devices manifest in this chapter have been story, metaphor and logic. All three elements are inter-related. The precise form in which the two-agency system that had existed since 1992 was replaced by the QAA is story but the growing concern with standards was a logical outcome of an increasingly competitive higher education sector. The inefficiency that attends information asymmetry and externalities is an integral feature of the economic model of competition and it was entirely logical that these would be dealt with by increasing specification of the ‘product’ and provision of infrastructural elements by the new regulatory agency.
Chapter 7: Quality Audit – From Shadows to Centre Stage

Introduction
The audits conducted by the HEQC were audits of universities’ quality assurance processes. Quality assurance also appeared in the ‘smaller grain’ guise of the subject area as one of the six ‘aspects’ assessed by the HEFCE and later the QAA. Prior to 1992 the forerunner of the HEQC had a wider remit than processes and procedures for assuring quality. Following the Reynolds Report (1986), the CVCP’s Academic Audit Unit (AAU) established an Academic Standards Group to set up codes of practice for the maintenance and monitoring of academic standards. However when the AAU was subsumed by the HEQC in 1992, academic audit had become quality audit. This move was not purely semantic; quality audit was not about the traditional focus on academic standards but with the quality assurance procedures existing in institutions. Moreover reference to ‘institutions’ involves assumptions about internal organisation. If the organizational architecture of universities is assumed to be ‘unitary’ then their value systems are easily summarized but a dyadic architecture makes simple assumptions hazardous.

Quality audit is not directly related to peer group mediated subject areas, but its institutional focus means that it is the natural responsibility of the managerial hierarchy of the institution and the systems within which it operates. Thus far the issue of ‘ownership’ has related to the agencies themselves but the dyadic organizational architecture of universities means that there is an important institutional issue of ownership in relation to the audit of quality assurance processes.

The Nature of the System to be Audited: the HEQC
The development of a quality assurance system for institutions needed to accommodate the diversity of the higher education sector whilst simultaneously offering the prospect of a degree of commonality. The approach taken by the HEQC

57 The formal title of this sixth ‘aspect’ was originally Quality Assurance and Enhancement but changed to Quality Management and Enhancement in 1999. I have been unable to trace any official comment on why this change was made.
was to call their suggestions ‘guidelines’ and ‘codes of practice’ and to adopt a consultative approach to their development. The subject of these guidelines and codes together constituted the scope of quality audit which ultimately constituted a recognizable system or framework. The first HEQC Guidelines were published in 1994, but the more developed version was issued in 1996. 58

Before detailing the quality assurance system itself the Council reiterated the quality concepts that were embedded within it.

Quality is used here to refer to the range of a student’s experience of higher education, while standards refers specifically to the levels of achievement that are expected and attained by students in their studies. Quality assurance is the means through which an institution confirms that the conditions are in place for students to achieve the standards set by the institution. Quality control provides the detailed procedures to render these conditions effective. (HEQC, 1996a, page 11)

Closer analysis of these definitions suggests that quality was a subjective phenomenon which would be a function of all of the resources provided by the institution. The subsequent reference to standards complicates the meaning of the passage. A logical definition would maintain the subjective orientation so that that quality assurance was the means through which the institution confirms that conditions were in place for an appropriate student experience. Instead the reference to standards switches the focus to outcomes via student achievement. Quality control was not clearly differentiated from quality assurance so that assurance was the totality of control procedures.

The quality assurance system in the HEQC Guidelines had the following elements;

1. Entry to higher education
2. Programme design, approval and review
3. Teaching and learning
4. Student development and support
5. Student communication and representation
6. Student assessment

7. External examiners
8. Staffing
9. Research degree students
10. Collaborative provision

Elements, 1-7 had a strong process orientation from student entry to exit. Research degree students followed logically from the process which related to earlier parts of the higher education service while collaborative provision is separate from the internal process but an important element within the historical context in which the Guidelines were drafted. Staffing is certainly a crucial element in higher education provision but it interrupts the logical ordering of the other elements because it is an input rather than part of the process. That having been said the term ‘staffing’ rather than ‘staff’ implied a focus on activity and process rather than quality prior to what has earlier been termed the point of delivery.

Moreover, unlike staffing the other major inputs to the higher education process were not identified as primary elements in the quality assurance system. It is surprising that such inputs as accommodation, IT and library stock and facilities did not accompany staffing in the list of elements. However these physical inputs were present in the Guidelines;

At institutional level, consideration should be given to making available .... library and IT services and an infrastructure to encourage and support independent student learning [emphasis added]. (HEQC, 1996a, page 29)

This statement appears under the ‘Practical Implications’ of the system for implementing the element of Teaching and Learning. What is surprising about the statement is that it appeared only as something to which consideration should be given rather than something which was of crucial importance to the quality of higher education. It is difficult to envisage a potential student not being concerned with such matters when she makes the decision about which institution to select. It is also difficult to imagine a commercial firm that would not regard quality in this area as of prime importance.
Why was the HEQC so reticent in this regard? One reason may be the close relationship between physical resource provision and the HEFCE’s unit of resource. The latter is closely related to the capital intensity of provision but there are no indicators of threshold resource provision per student. Such measurements would not be unduly difficult to generate but they would be politically sensitive in a constrained fiscal environment. It is possible that the reluctance to place more emphasis on physical resource provision accounts for the use of the term *academic* quality which became increasingly common as the decade progressed.

The format for each element in the Guidelines was a common one which began with Principles followed by Policy Considerations, Practical Implications and Examples of Current Practice. In total these comprised a comprehensive normative statement of the factors that each institution should consider. They succeeded in emphasizing good practice while eschewing a prescriptive approach to policies and procedures;

> The guidelines can be used by institutions when designing procedures anew; to compare their present practice with the systems and procedures outlined here; to review all or part of their internal arrangements; and to confirm that they reflect good practice elsewhere in the sector. ... The guidelines are intended to be used by both staff and students working at different levels in universities... Senior managers are likely to be interested in policy considerations across most sections, whereas programme level staff are likely to be interested in practical implications of policies... (HEQC, 1996a, page 3)

The reference to those ‘likely to be interested’ in the higher and lower levels of policy implementation clearly assumed that the incentive for such implementation would not be problematic. Such an assumption is predicated on a unitary architectural organization for universities similar to that which exists in commercial firms. In the latter case quality assurance systems can be imposed by managerial edict on the implicit understanding that enhanced profitability will lead ultimately to higher remuneration. This is more difficult in a dyadic organization where there will be goal incongruence between management and peer group.

The complexity and effort required to implement quality assurance comprehensively at the operational level of a university department is exemplified in a framework
Quality Audit under the QAA

The demise of the HEQC did not signal any major change of direction regarding quality audit. There was still a need to evaluate the approach taken by institutions to the assurance of quality but the existence of a single agency meant that a more integrated approach was possible. The contribution made by the QAA was to develop a framework for the assessment of quality and standards spanning what had previously been called audit and assessment. If the focus was on the historic link with HEQC audit, then the most obvious contribution was the refinement of the HEQC Guidelines into a Code of practice for the assurance of academic quality and standards in higher education.

The Code maintained the HEQC’s approach of specifying expectations without being prescriptive about how such expectations should be brought about.

Each section of the Code is structured into a series of precepts and accompanying outline guidance. The precepts identify those key matters that the QAA expects an institution to be addressing effectively through its own quality assurance mechanisms. The guidance is not intended to be either prescriptive or exhaustive: its purpose is to offer a framework which institutions may wish to adapt according to their own needs, traditions cultures and decision making processes. (QAA, May 2000, page 2)

In 2000 the development of the Codes and other dimensions of the QAA’s ‘Framework’ such as the National Qualifications Framework and Programme Specifications were integrated under the overarching concept of Academic Review. Academic Review embodied the two activities of subject and institutional review, the term review having replaced audit in the case of the latter.

In the Handbook for academic review the specific focus on institutions is related to the ‘robustness and security of the systems supporting an institution’s awarding function’. These ‘systems’ link directly with the National Qualifications Framework and four sections of the Code:
1. programme approval, monitoring and review;
2. assessment of students;
3. external examining
4. collaborative provision.

This was a significantly reduced scope of activity from the 10 dimensions present in the HEQC Guidelines. It omitted entry policies, teaching and learning, student support student representation, staffing and research degree students.

**The Return of ‘Audit’ to Centre Stage**

The most recent variant of quality audit was particularly important because it not only represented the current stage of the policy process relating to audit itself, but supplanted universal subject assessment. The fact that such a dramatic proposal had been made at a time when the QAA’s system of Academic Review had barely begun, was astonishing. This most recent variant of Quality Audit was contained in the consultation document *Quality Assurance in Higher Education* (2001). The proposal was jointly made by the HEFCE, Universities UK, the Standing Conference of Principals, and the QAA. The resignation of the Chief Executive of QAA shortly after its publication suggested that the development was not one which he felt able to support.

The reasons for ending universal subject review have never been made public, but its prominence in the concept of Academic Review that had just been unveiled meant that it was not part of a smooth and natural process of change based on experience. It was a major discontinuity which required research beyond the policy texts themselves and was an explicit question to four of the five respondents interviewed. The most confident response to the question of why quality assessment was discontinued was as follows; ‘I predicted that it would end....It was very surprising that the sector didn’t object more strongly to the relevant sections of the Dearing Report [which led to

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59 HEFCE (July 2001/45)
Academic Review] ... There were important developments in the public awareness of the direct and indirect costs of assessment – the joint impact of a report by PA Management Consultants, and the article in the Guardian by the Warwick economists who said what a useless process it was, and how they'd learned nothing from it. Finally Tony Giddens and Colin Lucas lobbied Number 10'(R4). The costs to the QAA of implementing Academic Review was also emphasized; ‘I think it was forced on the QAA by the cut in its budget and secondly by the threat of revolt by the Russell Group who were demanding a lighter touch. I think they made sure that the QAA had its budget cut’ (R3). On a more personal level; ‘...it must be assumed that John Randall lost ministerial confidence in his ability to deliver a cost-effective system. Academic review would have needed a significant increase in finding.’ (R2). ‘John Randall felt that audit was too soft and over-gentlemanly and he gambled on subject review feeling that it was unacceptable to retreat from it ... the general view was that it was a political coup – John Randall didn’t have a clue what was happening’ (R1).

Moving on to the detail of audit under the new truncated system, the objectives of the quality assurance of teaching and learning embodied in the proposal were fourfold;

1. To contribute, in conjunction with other mechanisms to the promotion of high quality and standards in teaching and learning.
2. To provide students, employers and others with reliable and consistent information about quality and standards at each higher education institution (HEI).
3. To ensure that HE programmes are identified where quality and standards are unsatisfactory, as a basis for ensuring rapid action to improve them.
4. To provide one means of securing accountability for the use of public funds received by HEIs. (HEFCE, July 2001, page 3)

There was nothing new about these objectives and the emphasis on ‘other mechanisms’ and the fact that this was ‘one means’ of securing accountability suggested that it was still possible for audit to coexist with review at subject level. In fact this was not the case. The objectives were secured primarily through each institution’s own internal quality assurance policies and procedures and the validation of these was to be the focus of audit.
The experience of subject review was presented as valuable in the sense that it has helped the institutions to develop their quality assurance procedures so that;

...As a result it is no longer necessary to maintain comprehensive external review at subject level. (HEFCE, July 2001, page 3)

External review at the level of individual subjects would still be made under certain conditions but these would be highly selective and they would;

Vary the intensity of external review on the principle of ‘intervention in inverse proportion to success’, selecting areas or themes for more detailed review on a purposive basis, focused on programmes and institutions where there may be grounds for concern about quality and standards. (HEFCE, July 2001, page 3, Para.10c)

This approach placed great faith in the ability of quality audit of an institution’s internal processes to reveal in a credible way, any weaknesses that may lie ‘below’;

One purpose of such activity is to inform and verify the findings of the institution-level activity by analogy with an audit trail.... ‘Drilling down’ to the point of delivery, so as to examine in more detail a small selection of subject areas or themes is an important way of deriving evidence for, and increasing the reliability of, the conclusions formed during the audit review. (HEFCE, July 2001, page 6, para.25)

The focus of this ‘drilling down’ would not be randomly determined and there were three distinct explanations for it. Firstly the QAA would determine;

...a small number of subject areas or themes... for more detailed review. The QAA would aim to secure that a balance of provision was examined, across the whole sector, in each of the full range of 42 subject areas during a full five year review cycle. (HEFCE, July 2001, page 6, para.26)

If no areas of weakness were identified within any particular institution then no further action need be taken, but if weaknesses were discovered then the second reason for subject review would appear in the form of further visits to the relevant areas within the affected institution. Thirdly there would be specific review of subject areas to meet accreditation requirements of professional and statutory bodies. It was accepted that subject review in all of these guises would involve expertise beyond that traditionally required for institutional audit;

These reviews ...would be conducted by subject specialists, as part of an expanded audit team composed on established peer review principles [emphasis added] (HEFCE, July 2001, page 6, para.27)

Not surprisingly, this conflation of institutional audit and subject review made additional demands beyond that which was needed solely for the audit of quality
assurance processes. When subject review generated graded profiles of provision on a regular basis and these were used in the compilation of national league tables, the demand for information was at least partially sated. Institutional audit did generate much information via published reports but these did not achieve public prominence in the same way as the results of subject review. The loss of subject review places all of the burden for information provision on an audit process that was not really designed for this purpose.

A Task Group was established to determine the ‘categories of data, information and judgements which were to be made available’.60 One of the problems facing those drafting the proposal was that the need for clear and comprehensive public information had to be reconciled with the need for a demonstrably ‘lighter touch’ toward the institutions. The approach taken was to stress the need to use information that was generated by institutions for their own internal quality assurance purposes. The ‘illustrative’ data in the Report was described as ‘a standard range of key quantitative and qualitative information’ used internally and including data on;

1. Recruitment, progression and employment
2. Student feedback information
3. Programme Specifications
4. Summary results of internal approval and review processes
5. Summaries of external examiners’ reports
6. Promotion of high quality teaching and learning
7. Accreditation reviews
8. Previous institution reviews
9. Previous subject reviews

A subset of this information would be selected for publication by all HEIs and it would be for the Task Group to decide on what it should be, its format and the regularity with which it should be published.

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60 The Task Group was to be chaired by Professor Ron Cooke, Vice-Chancellor of the University of York with terms of reference given in Annexe A on the Report.
This published subset would be the primary resource for students, employers and others to get up-to-date, consistent information about quality and standards (HEFCE July 2001, page 5, para.16.)

This ‘primary resource’ would be very difficult to deliver in practice because the issue of consistency was very problematic. These data were published in order to inform the decisions of students about where to study and to inform employers of the standards of awards obtained by potential employees. Such information must be credible and consistent. The author’s own institution responded to the request for feedback on the proposal with the following;

At present the assumptions about common usage of data are not predicated upon a common integrated data requirement. Consequently HE institutions have to make frequent changes to their student record system......These changes......affect form design, screen design, documentation, training, and can impact on the planning and operation of fundamental administrative exercises such as student enrolment but without due regard for the time necessary to plan and implement these arrangements effectively. External data requirements are therefore costly.

There has been a suggestion that data already returned to HESA can satisfy the requirement at Para. 15a....We doubt that this can be done without significant changes and associated costs. Our experience of data supplied by HESA for the TTA, was that the TTA had sufficient concerns to provide institutions with the option of submitting information directly to the TTA for the first 2 years because of questions of data integrity. ...Furthermore HESA can only deliver only on the requirement of Para. 15a. For the rest of the requirements specified in Para.15, institutions will have to create data, and if reviewers are to have access to data there will need to be guidelines if there is to be sufficient consistency between institutions...(University of Portsmouth, 2001, mimeo.)

The Report of the Task Group (HEFCE 02/15) subsequently identified 43 separate dimensions which Institutions should report on via a Teaching Quality Information (TQI) website which would be set up for this purpose. A subsequent report (HEFCE, October 2003) provided more detailed templates for this information.

The issue of consistent data generation was one of a number of reservations about the proposal, but there was almost complete unanimity from the universities about the desirability of ending universal subject review. Once it appeared that this had been achieved, attention turned to resisting any continuation of subject review for any
reason whatsoever, including 'areas of concern', and finally it even extended to those subject areas that had never been reviewed.

The removal of subject review should be seen within the context of the whole system of 'academic review' that the QAA had just finished designing. Within this schema subject and institutional review were interdependent in the sense that the former was an important source of 'small grain' information for the latter. Institutional review was based on a six year cycle but was also informed by continuous engagement with institutions arising from subject review which;

... will generate considerable evidence about the way in which institutional systems are working in practice. Nevertheless there remains a 'senior layer' in the institutional structure where the overall responsibility for quality and standards resides, and which provides the focus for an overall, 'capstone' review of the effectiveness of the management of that responsibility [parentheses in original].

(QAA, 2000, page 18, para.98)

If subject review was removed completely then this 'senior layer' of management would be all that remained and it would become a 'capstone' review. This did not sit comfortably with the vision of quality assurance embodied in the July Proposal. It could be said that the vision of institutional audit in the July Proposal was significantly different from the vision of institutional review in the QAA's Handbook for academic review. Indeed it was, and one of the most obvious differences related to the need for the Proposal to embody some of the policy dimensions that would otherwise be lost with the disappearance of universal subject review. Paragraph 11 of the Proposal contained the most specific reference;

The proposed method would operate within the framework being established by the QAA of standards benchmarks in each subject area, the qualifications framework, the various sections of the QAA code of practice, and the programme specifications. Between them, those provide common points of reference for institutions as they assess the quality and standards of their programmes and awards.(HEFCE, July 2001, page 4.)

In fact the 'framework being established' had been established, and was set out in detail in the QAA Handbook for Academic Review, but it was set out on the assumption that subject and institutional review would coexist. Of the four elements

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61 Accounting and any new programmes.
of the framework, the code of practice and the qualifications framework were clearly infrastructure based, and the natural responsibility of the institution’s managerial hierarchy rather than its academic peer group. The standards benchmarks and programme specifications were more ambiguous. Institutional policies could obviously embody the requirement that departments or subject areas should frame their documented curricula in terms of the benchmarks and specifications, but the assurance that the substantive content of these documents were appropriate, was a peer group matter. Without the external stimulus of subject review an equivalent, and equally robust system of quality assurance had to be devised, and this system had to have a conspicuous element of externality if it was to be regarded as a credible alternative.

It could be claimed that the two traditional roles of the external examiner and of external assessors on validation committees fulfilled this function, but such roles have always existed and the concerns expressed by the Dearing Report suggested that they had not been discharged in a sufficiently robust fashion to safeguard academic standards. In the absence of radical alternatives such as accreditation, the hope must have been that these traditional roles would be galvanized by the introduction of benchmarks and programme specifications. It was not obvious how this would be achieved.

**Conclusions and the Link with an Economic Interpretation**

The policy process relating to quality audit was characterized by a cycle which restored the pre-eminence of the institutions as the guardians of quality and standards of provision. From 1987 to 2001 quality audit coexisted with subject review but it was the latter that was seen as being at the sharp end of public policy. In political terms subject review was the focus of reassurance that public funds were being used in an appropriate fashion. There are two interpretations of the demise of subject review; firstly it could be seen to have been so successful that institutions were to develop their procedures to the point where they could be relied upon to operate satisfactorily without external stimulus. Alternatively the direct and indirect costs of
subject review were so burdensome that it would be impossible to justify the resource demands that its continuation would require.

The ‘capstone’ approach identified the institution explicitly with its senior managers in the implementation of the review process. This assumed a unitary organizational architecture where the co-operation of the academic peer group was assumed not to be problematic. The demise of subject review removed the forum where peer groups were actively involved and the danger now exists of a system which represents quality assurance as a ‘top-down’ process involving compliance rather than co-management. The author’s IFS focused on the balance between ownership and compliance in the implementation of quality assurance systems and there was a strong response to the effect that, although quality assurance was necessary, the design of the existing systems did not facilitate ownership;

To my mind it [the University’s quality assurance system] evokes a large centralized system of monitoring, not of help and support (IFS R7). If people are always rushing to get something in the ownership factor gets reduced. There’s nothing of them in it. A lot of University documentation doesn’t refer to people...there’s no people ownership. We could have documentation which fills a room but if people don’t relate to it you’ve lost motivation and goodwill (IFS R9). Putting systems into place is easy but ensuring compliance is much more difficult. I think we’re in danger of evaluating ourselves into oblivion. We’re losing touch with spontaneity in this Tayloristic system (IFS R10)

In principle the outcomes of the work of the academic peer groups are embodied in the annual publication of Teaching Quality Information (TQI), particularly in the data on progression and achievement classified by subject area. Such data conveys information on the achievement standards of students, but the credibility of the data is dependent on the appropriateness of the yardstick standards that are embedded in the assessment of achievement. The trust good depiction of yardstick standards suggests that the incentives to maintain appropriate standards in the face of pressure to generate ‘satisfactory’ performance indicators rests with the professionalism of the peer group. The problem here is that since 1992 such professionalism has been depicted as an outmoded mechanism for such assurance.

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62 TQI represents the reappearance of the performance indicator, a concept which has had fluctuating significance over more than twenty years of higher education policy. See Cave et al, 1997.
The prisoners’ dilemma game leading to excessive documentation still exists under the institutional review albeit in a slightly different form. Under the new system the reputation loss resulting from adverse publicity affects the institution rather than subject area and the fact that we are still dealing with second order quality via the ‘show and tell’\(^{63}\) of documentation and visit means that extensive documentation will be produced throughout the institution. At the time of writing the author’s university is three months away from an Institutional Audit, and all departments are engaged in documentation preparation in case they are one of the few chosen for a ‘Discipline Based Audit Trail’. A senior member of the University overseeing preparation stated; ‘I think there are enormous problems with the principles on which it [institutional audit] is based and it is deeply flawed. Its also hugely costly – the true costs are grossly underestimated. Our preparations...have involved me in 40 hours of discussion and we’re 6 months away from the event. We’re not really benefiting at all from any of this. I think a sampling system which emphasized good practice would be much more beneficial’ (R2).

The restoration of audit as the methodology for the quality assurance of English higher education involves all four elements of McCloskey’s rhetorical tetrad. The story embodies the political decisions to disestablish the HEQC and to end subject review but this story is interlaced with fact, metaphor and logic. The fact of the burdensome cost of subject review was not an historical accident but was a direct consequence of the rational behaviour of universities endeavouring to ensure that inadequate volume of documentation in episodic events was not interpreted as a sloppy approach to quality and standards. There was a logic to excessive documentation. The metaphor is manifest in the dyadic model of university organization which focuses on the locus of responsibility for quality assurance under the audit methodology. The capstone approach located responsibility with the

\(^{63}\) An argument could be made that ‘show and tell’ has been replaced by ‘show’ under the latest arrangements. Auditors are based at the ‘centre’ of universities and receive documented versions of policies, procedures and outcomes with no meetings to discuss these issues with those directly involved.
managerial hierarchy of the university and the validity of this simplified approach depended on a cohesive and unitary organizational structure at odds with the dyadic university firm.
Chapter 8: Analytical Interpretation

Introduction
The purpose of this chapter is to look beyond the phases of the policy process at certain over-arching themes that have emerged over the period. These themes link directly with the analytical framework that was developed in Chapter 2.

Episodic Review and Documentation
One of the most striking features of the policy process has been the increase in the volume of documentation that was generated by institutions in response to visits by the HEFCE and the QAA. The decision to adopt a system of announced visits made excessive documentation production inevitable via the Prisoners' Dilemma pathology. If the alternative of unannounced visits had been adopted, then the assessment of quality would have focused on the quality of provision actually experienced by students with little opportunity to make 'special' arrangements. The problem with spot checks is that they would have eroded the political relationship between the universities on the one hand and the agencies and government on the other. In 1992, the establishment of external checks on universities was contentious enough without selecting a particularly low trust variant of the process.

As subject review developed, it was matched by an increased level of sophistication about the preparations that were made. For example, the universities would allocate staff to the role of Institutional Facilitator to liaise between review panels and the staff of the subject areas concerned. During the visit itself the latter would be informed of any emerging concerns and be given an opportunity to provide evidence to allay such concerns.64

The preparation for the episodes typically lasted at least twelve months because it was necessary to review the quality assurance system that the institution claimed was in

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64 Up to three Facilitators would be nominated by their institution and trained by the QAA. See QAA (2000), Handbook for Academic Review, Annex F, pages 43-44.
existence, and to generate documented records that matched both the stated system and the perceived expectations of the review panel. There is an inevitable dynamic element of escalation about the preparation and the associated documentation. Since the atypicality of the episode is tacitly acknowledged by both sides a failure to pay 'tribute' runs the risk of being interpreted as being a credible indicator of a sloppy approach to quality under 'normal' conditions.

The various dimensions of the episode itself had differing degrees of credibility and those higher credibility dimensions would inevitably be regarded as 'pinch points' in the review process. Examples of such pinch points were reports of external examiners, responses of students interviewed by the review team, examples of the students' written work, and the data relating to progression and achievement.

Episodic review was a characteristic both of assessment of subject areas and audit of the whole institution. The points made above relate specifically to assessment but audit was also subject to the same difficulties. In the case of audit the process was designed to deal with the quality assurance system rather than the quality experienced by students. For this reason the danger of opportunistic documentation production was even greater because what Power (1997) has called first order quality was not the focus of attention. Audit teams were interested in the second order systems that purportedly attended the assurance and enhancement of quality.

Such second order systems were by their very nature, documented systems which raises the question of whether good documented systems will always, or even usually correspond to good first order provision. The answer to the latter question depends on the incentive to implement documented policies and procedures. If there is a strong incentive then the presence of the latter is a credible indicator of first order quality. If

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65 The twelve month preparation period is the policy in the author's university but it also emanates naturally from the agencies' wish to see evidence of normal practice. If there is no record of something having been done then it will not be thought credible.

66 Although in the case of student achievement there is a credibility issue relating to the underlying appropriateness of the academic standards that inform the assessment process.
incentives are inherently problematic then policies and procedures lack credibility. Low credibility coupled with episodic review leads to excessive documentation production as a proxy for appropriate first order quality.

**Complexity and Quality**

Over the period there were two conspicuous phases of increased complexity the first of which related to the development by the HEFCE of a graded profile for quality assessment under subject review. The development of the graded profile was an increase in both the scope and the complexity of quality assessment and was a logical consequence of the shortcomings of the assessment regime that began in 1992. The HEFCE, doubtless mindful of the burden of assessment had instituted a system that did not require universal visiting of institutions. Such a system was consistent with the rather modest purpose of ensuring that HEFCE funded provision was of satisfactory quality or better. However, as was shown in Chapter 4 the language of assessment was very important.

A major problem with this language was the introduction of a relativist conception of quality which had ‘excellent’ as one of its descriptors. A senior officer of the HEFCE put the matter thus; ‘From 1992 onwards quality was defined tautologically....quality was relative not absolute...There were grave concerns about the language being used especially the fact that so much provision was being defined as satisfactory....and this was seen as damaging to UK higher education. Furthermore the language of excellence is inappropriate when you’re not marking against absolute standards’ (R2).

It was not surprising therefore that the first regulatory ‘regime’ was, within two years, replaced with a more complex variant which eschewed ‘excellence’ in favour of a finer grained system of reporting. The generation of the six ‘aspects’ and their grading on a scale of one to four made it more difficult to interpret the presence or absence of excellence.

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67 We will return to the incentive issue later in this Chapter.
The graded profile was an increase in complexity that also constituted a natural development of the focus of assessment. The profile introduced an element of standardization as well as a tighter definition of what was to be assessed, both of which were seen as necessary if visiting was to become universal. The introduction of universal visiting increased the cost of assessment significantly. The escalation of documentation and the increased complexity of the assessment process set the scene for the five years of quality assessment between 1995 and 2000. This was the heart of quality regulation over the period and the burden that it would represent would ultimately lead to its demise.

**Complexity and Standards**

The second phase on increased complexity related to standards. When the QAA took over the work of the HEQC in 1997, standards had to be integrated into the quality assurance regulatory regime. In some respects this integration was accomplished in a similar way to the refinement of the quality assessment method in 1995, namely by focusing on a smaller 'grain' of provision. The assurance of a service characterized by ex post information asymmetry was to be done by removing the informational problem through the conversion of higher education from a trust good to a search good.

The analytical framework developed in Chapter 2 generated the concept of academic professionalism as the provision of a Trust Good. The trust was related to the exercise of academic judgement regarding the design of curricula and the assessment of learners. The QAA project was to minimize the role of trust based judgement by devising specifications of curriculum design and learning outcomes. There is an analogy here to the drafting of legislation and judgements in a court of law. Legal judgements are made more or less contentious by the nature of the statutes to which they relate. Soundly based statutes will at least minimize the chances that judgements will be inconsistent and in an ideal world will lead to just outcomes as well. However there will always be a need for the exercise of judgement linked to the particular case, and such judgement will require a careful balancing of all relevant factors.
The analogy with the drafting of legislation relates to the requirement for clearer information about the structure of programmes, their content, their outcomes, and finally their level. This whole outcomes based methodology represented the culmination of the QAA’s ‘Standards Agenda’ but it depended for its validity on the credibility of the specifications.

If the drive to define and specify smaller grain aspects of the higher education service results in high credibility outcome signals then the QAA’s project will have circumvented the informational deficiency that underlay the concept of the trust good. Returning to the legal analogy, if the legislation is sufficiently well drafted the exercise of judgement in each individual case moves closer to the algorithmic. However if specification is via low credibility signals, then the informational problem remains.

In fact signals about standards have varying degrees of credibility. For example, some outcomes are by their very nature highly credible; whether or not an economics student can use differential calculus to find the profit maximization position for a firm is a highly credible learning outcome. Generalising this point, it would seem reasonable to suppose that competences based on technical ability are particularly amenable to the outcomes based methodology. However there are other more qualitative competences that are more difficult to judge. If our same economics student has decided in her third year to write a dissertation on pricing behaviour in the Greek Machine Tool Industry, the assessment of her performance will have to take into account such factors as the difficulty of obtaining data and the choice of research methods relative to the training offered in supporting units, and the amount of guidance given by the supervisor. The resulting competences will need to be judged by the higher education practitioner in a way that skillfully balances all of the information at her disposal. This judgement does of course involve the use of generic assessment criteria but it also involves a decision about whether in this particular case a specified threshold has been reached.
Judgement in specific cases is not always algorithmic and when it is not it involves 'impacted' knowledge of professionally derived academic standards. The link between this impacted knowledge and appropriate academic standards is at the heart of the trust good conception and the professionalism that attends its provision. There is simply no way of 'assuring' that appropriate standards have always been used.

The relative interpretation of academic quality was less problematic when applied to quality assurance and quality assessment but the advent of the 'standards agenda' raised philosophical difficulties that were never resolved. The 'gold-standard' approach to standards is redolent of ordinal quality. However standards, unlike quality, inevitably carry a strong implication of 'vertical' judgement. The QAA's response to this problem was seen most clearly in the administration of the subject benchmark standards that purportedly linked individual programmes with peer group mediated statements of appropriateness. These statements could never be allowed to be prescriptive for fear that they would constitute a national curriculum but if they were not prescriptive they were deprived of the force necessary to 'assure' standards.

The Failure to Establish Infrastructure

The Dearing Report linked standards with qualifications in a proposed National Qualifications Framework which would embrace the whole of the United Kingdom. The framework is clearly an infrastructural phenomenon requiring the existence of an agency above the level of the higher education institutions themselves but the delivery of the infrastructure required the co-operation of the institutions who hitherto had cherished their autonomy.

A significant part of the Dearing Framework was not delivered by the QAA. The credit rating of awards was dropped in the final English version of the National Qualifications Framework although retained in Scotland. However the most significant failure of the QAA related to the time taken to obtain awards at various levels within a so-called qualifications framework.
The Dearing Framework contained the eight levels set out in Figure 8.1.

<table>
<thead>
<tr>
<th>Level</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>H8</td>
<td>Doctorate</td>
</tr>
<tr>
<td>H7</td>
<td>MPhil</td>
</tr>
<tr>
<td>H6</td>
<td>Masters degree</td>
</tr>
<tr>
<td>H5</td>
<td>Higher Honours/Postgrad. Conversion</td>
</tr>
<tr>
<td>H4</td>
<td>Honours degree</td>
</tr>
<tr>
<td>H3</td>
<td>Bachelors degree</td>
</tr>
<tr>
<td>H2</td>
<td>Diploma</td>
</tr>
<tr>
<td>H1</td>
<td>Certificate</td>
</tr>
</tbody>
</table>

Figure 8.1.

This framework was thought an appropriate basis for contributing to the recognition and standing of UK awards throughout Europe and the world. (NCIHE (1997), Para. 10.41, page 149). Unfortunately Dearing stated that awards should be based on achievement rather than on the length of study required and this served to dilute the impact of the eight levels so that when the QAA framework for England was published four years later Dearing's eight levels had been reduced to five (QAA, January 2001, page 4.).

<table>
<thead>
<tr>
<th>Level</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>5</td>
<td>Doctoral (D level)</td>
</tr>
<tr>
<td>4</td>
<td>Masters (M level)</td>
</tr>
<tr>
<td>3</td>
<td>Honours (H level)</td>
</tr>
<tr>
<td>2</td>
<td>Intermediate (I level)</td>
</tr>
<tr>
<td>1</td>
<td>Certificate (C level)</td>
</tr>
</tbody>
</table>

Figure 8.2.

Under the QAA framework the ‘typical’ route to an honours degree was three years of study. The Dearing schema did allow for an ‘accelerated route to a three year outcome but only for those candidates that were appropriately qualified in terms of specialized prior qualifications. The second major difference was the loss of the conversion year for candidates who did not have undergraduate specialization in the same area that was the focus of the masters degree.

The introduction of the fourth undergraduate year would have been a clear and obvious way of signalling the difference between a general and specialized curriculum. The English tradition of expecting almost all undergraduates to undertake honours programmes of three years duration fitted well into a system where a
relatively small proportion of the population went to university and the completion rates were correspondingly high. It was less suited to the era of massification and significantly widening access. There were two additional factors which emphasized the logic of a move to four year honours degrees. The first was the fact that in Scotland, Canada, the United States, mainland Europe, Australia and New Zealand the four year honours degree is commonplace. Secondly, the HEQC’s Graduate Standards Programme developed the notion of ‘graduateness’ in relation to a threshold standard of attainment at the pass level. The three year general Bachelors Degree envisaged by Dearing would have fitted neatly into such a schema with the fourth honours year clearly reflecting attainment beyond the threshold level. Thus Dearing and the QAA were successfully rebuffed by the universities.

Moving to the postgraduate level, the Dearing distinction between conversion and specialized masters degrees has been shown to be a very significant issue in the Report. The distinction is most obviously accomplished by specifying additional input to ensure that appropriate preparation is provided to assure outcome standards. Such input can be in the form of time or credits or both. In this case regulatory capture was accomplished by removing both time and credits from the English version of the National Qualifications Framework. Thus the standards of English Masters degrees will be assured by pronouncing the attainment of learning outcomes at Level M with the implication that the perceived problem of standards with awards such as the MBA were due to the sector’s failure to specify adequately what was expected of graduates. Once again we are faced with the credibility problem of an outcomes based methodology.

**The End of Quality Assessment**

Throughout the period covered by this thesis political pronouncements on the regulation of quality in higher education have emphasized the division of labour whereby universities retained responsibility for academic standards of their awards but external regulatory agencies promoted accountability for assessment of the quality of learning and teaching that was provided to students.
The creation of the QAA as a single agency in 1997 was intended to remove the duplication inherent in the dual agency system represented by HEFCE and HEQC. However the QAA’s proposals for the integrated scheme of Academic Review had barely been announced before proposals for the discontinuation of universal quality assessment were circulated for consultation. If universal quality assessment had continued under Academic Review it would have represented far more than a seamless development of subject review. The integration of academic standards coupled with the demise of the HEQC meant, not only that the universities had less ownership of the regulatory process, but the process itself had changed so as to reduce substantially their degree of autonomy.

While the HEQC was the physical embodiment of the universities’ point of view and the HEFCE and QAA did not embrace academic standards there was a cumbersome stability to the policy process. Academic Review removed this stability and this, together with widespread fears that ‘lightness of touch’ would not be realized, led to its collapse.

**Institutional Audit and Incentive**

Institutional Audit returns to universities the responsibility for the assurance of their provision. This situation bears some similarities with that which existed when the old universities were scrutinized by the CVCP’s Academic Audit Unit but there are important differences of both scope and detail which have been set out earlier in this thesis. Although the infrastructural recommendations of the Dearing Report were jettisoned, the panoply of devices devised by the QAA to assure standards remain intact. Programme Specifications, Benchmark Statements, Level Descriptors and Codes of Practice will certainly inform the process of Institutional Audit but will do so one stage removed from the first level quality experienced by students.

Chapter 7 showed how institutional audit will focus on the top-level arrangements for quality assurance so the engagement with each institution will be with the senior level
of the managerial hierarchy rather than the academic peer group at subject level. Although a great deal of emphasis is given to the anticipated robustness of audit trails and ‘drilling down’ to subject level, this will be relatively limited. The purpose of drilling down is to test the strength of policies and procedures rather than the quality of subject provision *per se*. If second order quality assurance is to be a credible measure of first order quality there must be widespread incentives throughout each institution to ‘own’ the policies and processes involved. There are two major obstacles to this ownership, one specific to higher education and one inherent in the operation of quality assurance systems in any context.

The obstacle that is specific to higher education is related to the dyadic organisational architecture of the university. It is unlikely that the university’s peer group will have quite the same incentive as its managerial hierarchy to engage in willing ownership of the quality assurance system. One of the most persistent findings of the author’s Institutional Focused Study was the attitude of compliance that pervaded the peer group in this regard. This confirmed the author’s own experience over more than ten years as a Faculty Head of Quality Assurance that quality assurance systems as opposed to quality itself, are viewed by the peer group as the concern of managers.

The second obstacle is not specific to higher education and relates to the fact that exhorting employees to ‘get it right first time’ rather than ‘inspect quality in’ are simply exhortations, and present quality assurance as a panacea for inadequate performance. Brickley *et al* state;

> Although the popular press and existing literature on organizations are replete with jargon – TQM, reengineering, outsourcing, teaming, venturing, empowerment and corporate culture – they fail to provide managers with a systematic comprehensive framework for examining organizational problems. (Brickley *et al*, 1997, page vii)

If quality assurance is implemented via exhortation then the implication is that it is doomed to fail in the same way that it has failed in market based firms that have taken a panacea based approach. A more rigorous approach to implementation is identified in a seminal article by Jensen and Meckling who have identified three related organizational features;
Thus the incentive structure necessary for the success of policies to change the
behaviour of individual members of the firm amounts to more than exhortation. When
we combine the dyadic organizational architecture of the university firm with the
three part system set out above, considerable doubt is cast on the ability of ‘top-
down’ quality assurance systems to deliver the necessary outcomes in universities.

Conclusions
The above interpretation of the policy process has illustrated the central theme that
the subject of policy can never be independent of its implementation. The episodic
nature of assessment and audit visits encouraged ‘set piece’ responses did not
necessarily reflect the ongoing activity outside the episodes themselves. Moreover the
desire to obtain high ‘scores’ on assessment led to more and more costly preparation
for these episodes via the Prisoners’ Dilemma pathology.

The natural tendency of the policy agencies to refine the systems of assessment and
audit led to a natural increase in the complexity of the policy regimes which again
served to increase their cost. The infrastructural aspect of policy was largely defeated
by regulatory capture as the universities successfully resisted the attempts by the
QAA to introduce system-wide changes promoted in the Dearing Report. Regulatory
capture was facilitated by a combination of the high cost and political sensitivity of
implementing the Dearing recommendations.
Chapter 9: Critique, Conclusions and Recommendations

Introduction
This thesis was a policy study of the development of the system for the regulation of quality and standards in English universities between 1992 and 2003. Economic methodology determined the perspective that was taken regarding the importance of self-interested behaviour by participants. Empirical considerations related to the institutional arrangements, the sequence of events, the period under consideration and the ‘data’ represented by the policy texts. The economic methodology was supplemented in a few selected areas by interviews with respondents who it was thought had knowledge of a particular aspect of the policy process. The thesis was a development of research for the Institution Focused Study that preceded it in the EdD programme.

Analytical Framework Appraisal: The Trust Good
The validity of the trust good conception of professionalism depends on whether its three defining characteristics of ex post information asymmetry, public and merit good are valid characterizations. If they are, then a policy which de-professionalises is necessarily a bad thing. If on the other hand it is not the case that the defining characteristics exist then no such conclusion can be drawn. The purpose of the argument has not been to engage in special pleading on behalf of a particular group of practitioners so that they are to be spared the need to be accountable for the quality of their work.

Is the higher education service characterized by ex post information asymmetry? One of the most important thrusts of policy has been the attempt to specify the higher education service in such a way that its ‘consumers’, both direct and indirect, have accurate and credible information ex ante. Thus ex-post information asymmetry has been vigorously contested by the regulatory agencies over the period of this thesis, and there is no doubt that this exercise has diminished the core of the service that is subject to trust, but has it removed it, and is what remains significant? It is the view
of the author of this thesis, that the answers to these questions are no, and yes respectively. The yardstick academic standards that inform the judgement made about individual student performance remain at the heart of professional practice and still resistant to the specification project.

The higher education service is extensive and complex and it is should not be regarded as surprising that its informational characteristics are not homogeneous throughout. If we adopt the terminology used by Nelson (1970) and Darby and Karni (1973), search, experience and credence goods coexist in the service. Yardstick and achievement standards have strong credence characteristics while the quality of resources have search and experience qualities, so standards depend on trust while resource quality does not. This conclusion is at odds with the outcomes based approach to standards which purports to assure standards by the confirmation that stated learning outcomes have taken place. Chapter 6 showed that an outcomes based approach is still dependent on academic judgement to confirm that what was pronounced has in fact taken place and that such judgement is based on trust. It is of course true that the credible signalling of outcomes varies between subjects but there is still a very significant area subject to credibility problems.

Is the higher education service characterized by merit and public good characteristics? Once again the answer depends on the focus of our attention, and once again the distinction between quality and standards is important. The quality of physical and human resources provided to students do not have either merit or public good characteristics and are indistinguishable from those of any private commercial enterprise. However the intellectual rigour of a course of study in relation to its stated level, and the yardstick and achievement standards that inform its assessment for a stated award do reflect merit and public good characteristics. If such standards are inappropriate then the provenance of awards is threatened. This threat has effects which extend beyond the individual student ‘customer’, parents, employers and even government. The ‘silent stakeholder’ in all of this is the public interest, but it is not difficult to see that this is easy to ignore. Matthews put the matter thus;
...the quasi-judicial role implied by the obligation to provide a public good offers some case for treating the professions as a class qualitatively apart from business....a priestly code involves an internalized morality that does not derive from the revealed preferences either of the client or of the state. (Matthews, (1991); page 741)

Matthews was not specifically referring to higher education but it has been a central argument in this thesis that academic standards are a particularly problematic example of professional services in the sense that trust is necessarily more prominent. Thus the trust good’s characteristics is what makes the higher education product different from that of a firm producing a private good.

Be this as it may, a sceptic could still say that, notwithstanding these important differences, surely devices can be found to minimize the need for trust. Apart from being deeply unfashionable, and in certain tragic cases palpably untrue, surely we cannot simply accept that we have no alternative but to trust professionals and leave them to their own devices? The search for such devices will not even begin if we simply ignore the above differences and assume that the assurance of quality in universities is no different from elsewhere.

**Analytical Framework Appraisal: The Dyadic University Firm**

The assertion that the university consists of the two transactional modes of peer group and hierarchy placed the trust good in an institutional setting. But is it a justified assertion? The relative power of managerial hierarchy and academic peer group within different universities is an empirical question which is beyond the scope of this thesis. The author’s experience is of a post-1992 university where the peer group is unquestionably less powerful but the same may not hold for chartered universities. However it would be reasonable to conclude that the peer group is not dominant and for this reason collegiality is at least outmoded as the dominant feature of organizational architecture in universities. What was argued was that a successfully managed university would obtain the efficiency enhancing benefits of peer group relational contracting by not eroding Williamsonian ‘atmosphere’ unnecessarily. This

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68 For example medical and legal services have far more credible indicators of appropriate practice.

69 This refers to the case of Dr. Harold Shipman.
‘paying unto Caesar’ notion involves a detailed understanding of which features of the quality system are the preserve of professional practice and should be devolved to the peer group, and which are capable of more straightforward assurance.

The sceptic would be very uneasy about devolving anything to the peer group since this returns trust to the centre of things. In any event does relational contracting involve significant benefits? The answer to this question is necessarily evidence based. The author’s Institution Focused Study dealt with precisely this issue in the evaluation of ownership versus compliance in the implementation of quality assurance systems. One of the most consistent findings was that interviewees felt estranged from the University’s quality assurance system. Since the central feature of all quality assurance systems is the willing participation in continuous quality improvement it is difficult to avoid the conclusion that perfunctory co-operation is incompatible with a successful quality assurance system.

If quality assurance is to be more than exhortation rhetoric Jensen and Meckling (1992), showed that organizational architecture has to be designed to this end. Those directly involved in providing the service have to have the power to make the relevant decisions, have to be rewarded appropriately for superior performance via an appropriate performance evaluation system. These are formidable requirements for market based firms free to set their own output and input prices, the difficulties for highly regulated English universities appear to be insurmountable.

Analytical Framework Appraisal: The Scope of the University Firm

The third and final part of the analytical framework emphasized the complexity of the vertically integrated university firm. It was accepted that technological innovation is changing the mode of delivery in very many respects but what was called the ‘traditional’ university is still surprisingly resilient. The complexity of this structure has been partly matched by the complexity of the quality assurance processes. English regulatory regimes have tried to simplify the assurance process by
progressively moving 'forward' from input through process to output measures of quality and standards. The problem with this movement was that simplicity was achieved at the expense of signal credibility. The *pronouncement* of learning outcomes and benchmark standards was not the same thing as their *achievement*.

One of the most curious features of quality assurance in higher education was the descriptor 'academic quality and standards' which was curious in the sense that it was a selective focus which diverted attention from the quality of the physical and human inputs toward the teaching and learning process and the assessment of achievement. The latter were unquestionably of crucial importance, but so were the former. It is true that the now discontinued quality assessment regime did focus on learning resources, but relativity ensured that questions about the absolute quality of learning resources were not asked. The author's Institution Focused Study discovered that shortcomings relating to physical surroundings and IT support systems were a very common source of disaffection among interviewees. The conclusion that is drawn is that the English systems for the assurance of quality and standards were deliberately partial, and were never going to emulate the emphasis on *total* quality management of private sector systems.

**Conclusions**

The analytical framework set out in Chapter 2 embodied an economic approach to the work of higher education practitioners, the organizational architecture of universities, and finally the range of products produced by the university firm. In Chapters 4 to 7 this framework was applied to the work of the regulatory agencies from 1992 onwards. The complexity of the higher education product was reflected in both the policy documentation and the policy implementation process during this period and the relevance of each of the three parts of the framework varies over the historical phases of the process. However the dominant theme that constitutes the core of the thesis is the informational characteristics of the higher education product and the

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70 In the case of the subject area most recently reviewed by the QAA there was much comment about the 'excellent' score given to learning resources that were a frequent source of complaint by both staff and students.
efforts made by the agencies to clarify the true nature of inputs and outcomes for the benefit of the numerous stakeholders involved.

The information embodied in the various parts of the higher education product were classified as trust, credence, experience, and search goods. Since only search goods have a quality that is identifiable by the consumer prior to purchase, an important part of the agencies' work was the attempt to recast trust, credence and experience goods as search goods. The success of such a project would depend on the credibility of the signals that would be the focus of search.

Quality signalling was certainly an important issue in the first phase of quality assessment between 1992 and 1995 where the self-designation 'satisfactory' was a credible indicator that provision was not 'excellent'. To some extent the move to a graded profile between 1995 and 2000 coupled with universal visiting increased the signal credibility of quality assessments. However the fact that these assessments were the result of pre-announced visits and the significant increase in the scores over time, meant that there were still limits to the extent to which search good status was achieved.

The enhancement of search characteristics came at a substantial cost most obviously from the transition from selective to universal visiting but economic rationality also explains the excessive documentation production that characterized the system and was analysed via the Prisoners' Dilemma pathology.

Chapter 4 focused on search characteristics embedded in the quality assessment system. The assessment of quality of provision was accompanied by a view that standards were the responsibility of the universities rather than the regulatory agencies. Notwithstanding this view there was, from 1994 onward, increasing emphasis on standards, initially via the HEQC Graduate Standards project analysed in

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71 The move to universal visiting and a graded profile is an example of the economic concept of the full-disclosure principle, which holds that if a credible signal exists, not making such a signal is a credible signal of inferior quality.
Chapter 5, and continuing through the recommendations of the Dearing Report and the Standards Agenda of the QAA analysed in Chapter 6. The development of standards related policy texts impacted on quality assessment when the QAA took over the work of the HEFCE. Although Academic Review never came into being in the form initially envisaged by the QAA the drive to turn academic standards into a search good is an important feature of the present system of Quality Audit. The QAA’s present conception of ‘academic infrastructure’ embodies the Qualifications Framework, the Code of Practice for the assurance of academic quality and standards, subject benchmark statements and programme specifications72.

The success of this search good project is once again dependent on the signal credibility of the pronouncements made by institutions in their documented quality assurance procedures audited by the QAA. Although quality audits are subject to universal visiting, the subject areas within each institution are not73. We are left with the problem that documented second order quality may not accurately reflect first order quality. Finally, the Teaching Quality Information (TQI) that all institutions are required to publish from December 2004 has obvious search characteristics but the credibility of this information is a function of the appropriateness of the academic standards that have led to these learning outcomes.

Since September 2002 the debate has moved on to the value and possible differentiation of so-called ‘top-up’ fees, coupled with stated political objective of a drive for 50% participation rate in higher education. At the time of writing it appears likely that all universities will charge £3000 top-up fees with the possibility of differential bursaries to minimize the deterrent effect for economically disadvantaged applicants.74 There are two possible outcomes. The first is that the revenue obtained by the universities will increase, but not to the extent that financial viability is

72 The term academic infrastructure was widely used in the QAA Audit of the Author’s institution in April 2004.
73 Discipline audit trails (DATs) are sampled during each audit.
74 There is an interesting economic argument relating to differential bursaries. The latter are presented in the media as a concession to applicants, but the theory of price discrimination makes clear that they are a device for revenue maximization by the institution.
achieved and all universities retain partial State funding but take more full-cost international students at the expense of Home and EU applicants. The second possibility is that a group of top research based universities, the so-called Russell Group, move out of the State funded sector altogether and charge what the market will bear in much the same way as the leading United States universities. Those remaining in the State funded sector take more international students as in the first case.

What are the implications of these possibilities for the regulation of quality and standards? If a group of universities moved outside the State funded sector then there would be no compulsion for them to conform to the jurisdiction of the QAA. Operation in the marketplace means subjection to market based devices for dealing with information asymmetry the most important of which is firm-based property rights in reputation. Since reputation enhancement is a function of the credibility of the quality signals there is a natural incentive to invest in high credibility signals. The university rather than an external agency assumes the responsibility for quality and standards, and the university name becomes the ‘brand’ that embodies reputation. To some extent marketisation has initiated a weaker variation of institutional branding as analysed in Chapter 8 above, but complete privatization means a more all-embracing variant of this process. Of course the existence of market based quality signals does not remove the fundamental problem of inadequate customer information but it does mean that the signals that do exist have higher credibility.

Universities subject to significant State funding remain under the jurisdiction of the QAA’s system of Institutional Audit, but major changes have potentially damaging effect on quality and standards. The move to a higher level of top-up fees, increased recruitment of full-cost fee paying international students and finally the planned increased participation rate in higher education together constitute a highly competitive marketised sector but one which retains a sectoral rather than institution

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75 This course of action would almost certainly be accompanied by differential bursaries for reasons given above.
based focus for reputation. While the search good project has improved stakeholders’ ability to make judgements about quality and standards the marketisation of the higher education system raises the question of whether changes could be made to supplement existing indicators of quality and standards.

**Recommendations**

The drive to turn higher education into a search good led to more direct devices for specifying quality and standards via outcome pronouncements, but the effectiveness of the project is dependent on the signal credibility of these outcomes if *ex ante* assurance is to be successful. All of the following recommendations link with the single theme of enhanced signal credibility which has been a focal theme throughout the thesis. In each case the recommendation does not explicitly or implicitly involve jettisoning the academic infrastructure and outcome pronouncements but they do involve supplementing them with higher credibility devices. The devices in question are time, credits and accreditation.

**Recommendation: Four Undergraduate Years**

The English system of three year undergraduate degrees fitted well in a system where a relatively low proportion of school leavers entered higher education. Such an ‘elitist’ system was efficient because it achieved desired outcomes in less than the time taken in most other countries’ higher education systems, and was effective because of a relatively low rate of failure or non-completion. Three year degrees are less suited to system which aims for a participation rate of 50% of the age cohort. There is a strong argument in favour of an additional year of study to ensure that the requisite support is provided for appropriate learning outcomes to be reached. The first three years. If the participation rate is increased with no increase in the length of programmes then there is a danger either of an increased failure rate or of a lowering of yardstick academic standards.

There are a number of specific advantages to an additional year. If an honours award is conditional on performance at the end of three years it will lessen the need to erode
yardstick standards under a system which involves the presumption that all students have the capability to do an honours degree. A three year Bachelor’s degree as defined in the Dearing Report is a corollary of the argument for a four year honours system. Moreover attainment of the Bachelor’s degree links with the generic learning outcomes articulated in the HEQC Graduateness Project analysed in Chapter 5. Linked with such a system should be the opportunity for candidates to re-sit third year examinations if their initial performance was not at the level appropriate for entry to the honours year.

The four year system already exists in Scotland, continental Europe, North America, Australia and New Zealand and there are particular advantages in the drive for harmonization of quality and standards in a global higher education system. More particularly a four year system would have the advantage of a 2+2 format, whereby two year foundation degrees could be topped up by two further years as the widening participation agenda embraces further education institutions feeding universities.

Chapter 6 argued that the quality and standards of three year degrees will not be maintained and enhanced solely by the pronouncement of appropriate learning outcomes. An additional year adds a credible signal of quality and standards albeit an indirect input based signal to supplement the outcome based signals that have already been established. In addition to providing a credible signal, the fourth year lessens the pressure on quality and standards from the outset.

**Recommendation: A Credit Accumulation System**

A comprehensive credit accumulation system should be introduced together with complementary funding arrangements similar to that which exists in the United States. Those who wish to complete studies within the specified period would still be able to do so while those who were unable to complete, for whatever reason, would be able to take or retake components of the curriculum as they wished. Credit accumulation complements the four year undergraduate programme most obviously in the distinction between general and specific credit as identified in the Dearing
The flexibility of this system is also congruent with both the lifelong learning and widening participation agenda.

As in the case of an additional academic year, a credit accumulation system supplement the outcomes based methodology with a more credible indicator of volume of learning, albeit an input based indicator. Once again there is the additional benefit that the change lessens the initial pressure on quality and standards to ensure that students achieve the award within a specified period that may, in some instances, be too short.

**Recommendation: Accreditation of Postgraduate Programmes**

The validation of masters degrees should be more formally accredited. The intervention of an agency external to the individual awarding institution would increase credibility. The extension of accreditation beyond the professions to include mainstream university provision would have implications for the autonomy of the universities but such autonomy is relatively uncommon in an international context. Whether it does so to an unacceptable degree would depend on the ownership and scope of the accreditation function. Ownership should be vested in the universities themselves, not in the sense of each university accrediting its own awards which is the present system, but by a supra-institutional body composed of elected representatives from the subject communities.

Essentially such a system would empower the academic peer group to confirm that staff delivering a programme were appropriately qualified, and the programme itself was sufficiently rigorous to merit the designated title. The purely accrediting function would thus be input based but the inputs would be of high credibility. Outcomes would still be assured via the traditional mechanism of assessment.

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76 The Dearing Report also drew attention to the need for institutional flexibility in the design of programmes that mix general and specific credits in different ways.

77 The distinction between the provision of examining services and teaching services is lost when the scope of the university firm embodies both 'products'. The history of English higher education has notable examples of institutions performing the distinct services e.g. university colleges offering degrees awarded by the University of London and Oxford and Cambridge Colleges offering the degrees of the Universities of Oxford and Cambridge respectively.
mediated by external examiners. The negotiations with European institutions via the Bologna and Salamanca agreements would be facilitated by accreditation since this mechanism is used extensively in Europe.

Doubtless the operation of an accreditation system would favour the strong institutions but the manner and pace at which accreditation was introduced would need to be carefully managed to ensure that all institutions had sufficient time to adjust to the system.

A significant part of the thesis has been devoted to the analysis of the work of the regulatory agencies to devise mechanisms for maintaining and enhancing standards. Each of the above recommendations is directed at combating the erosion of academic yardstick standards by the introduction of higher credibility signals via time, credit, and accreditation. The political obstacles to the introduction of these measures is considerable but there would be a significant benefit in the form of the simplification of the regulatory system as documented pronouncements are not the sole focus of search activity. More specifically higher education provision is more successfully converted into a search good if there are more credible indicators of learning volume and level prior to purchase.

If standards are assured by more robust signals, it follows that the Quality Assurance Agency is free to focus, as its name implies, on institutional systems for the assurance of quality. There are two dimensions to this work. From the academic standpoint the most obvious focus is the Code of Practice that already exists but there is also the need to ensure value for money from the use of public funds relating to estate and other financial resources. What is being proposed here is similar in many respects to the value for money audits carried out by the National Audit Office. Indeed the NAO is empowered to audit higher education institutions but currently restricts its scope to
purely financial considerations.\textsuperscript{78} Thus the recommendation is made that institutional audit be retained albeit in a slightly different form from that which presently exists.

\textbf{Implications for Further Study}

The quality assessment systems for most of the period involved direct scrutiny of classroom teaching and the more general emphasis on learning and teaching has been a characteristic of the work of the agencies. There is a need for further research on the mechanisms that might overcome the goal incongruence of teaching as opposed to research. Pedagogy is still not adequately assured and enhanced by existing systems and it remains to be seen whether the Academy will fill this need. A licence to practice is the most obvious mechanism. There is another alternative which is of high credibility and low cost; unannounced visits would help ensure that students were getting what they expected but the political obstacles are formidable. Research could focus, not on universities' attitudes to such visits \textit{per se}, but on their attitudes to them compared to the much more burdensome alternatives that are currently in place.

The notion of a dyadic university firm was suggested as an analytical device based on the assumption that it reflected reality. The evidence for its existence was based on the author's experience and research into his own institution. There is scope for more extensive research into both data and attitudes that reflect the organizational architecture of English and overseas universities.

Although the idea of the student as customer has many dangers when dealt with simplistically, there is insufficient evidence about the differential value placed by students on the complex array of characteristics which they consume when they enroll on a course of study. More specifically, since courses are provided jointly with each student, the factors which govern the supply of student effort are important, particularly when part-time but increasingly lengthy employment is a feature throughout many students' enrolment.

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- Section 2: Collaborative provision – July 1999
- Section 5: Academic appeals and student complaints on academic matters – March 2000
- Section 6: Assessment of students – May 2000
- Section 7: Programme approval, monitoring and review – May 2000
- Section 8: Career education, information and guidance – January 2001
- Section 9: Placement learning – July 2001
- Section 10: Recruitment and admissions – September 2001


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Appendix 1: Themes Derived From the Ownership versus Compliance Study.

Peer Group Conceptions of ‘Quality’

**Theme: Striving**
The strongest theme was a belief in quality as a ‘leitmotif’ in the sense of striving in an open ended way to do one’s best for students as a professional practitioner.

*High quality is all about being outstanding in the sense of doing things to the highest standards available and being accountable. It’s about being convinced about the delivery and assessment of work...being reliable dependable, explicit - not cutting corners, not fobbing students off with half an answer. It’s also about the people involved – their expertise and professionalism (R10)*

One is trying to do something and you should do it well (R4)

Where views were more focused the teaching and learning function predominated:

*I think it means effectiveness. If you have quality teaching and learning it is effective teaching and learning...not only facilitating the process of knowledge acquisition but also generating enthusiasm for the subject (R11)*

The most obvious definition is the outcome of the student – the grade of work they submit and the grade of degree they get. Another one is the student experience. (R3)

I understand quality to mean that students are really pleased with the education they received and are prepared to recommend to others that they come here to learn. (R5)

Quality is ensuring that the students get a good service and I suppose value added at the end of their time in education. So they have quality in the academic field and quality in all other areas of academic life. You never get to the end of quality do you? I will always be striving to do things better. (R6)

**Theme: Differentiation**
A less open ended response resulted when respondents were more specific and concerned to differentiate various possible conceptions with an understanding of the production analogue in higher education:

*There are different contexts. There’s the context of my role, my job. Then there’s the quality of output – the students (R7)*

Definitional problems are acknowledged together with the dominance of the process based view as a means of top-down domination of the workforce:

*Part of the problem is defining quality. Some people view quality as a process – something endemic to what we do...some view it as a control mechanism where we’re inspected from above (R9)*

The ‘relay’ function of quality as described by Ball [1993] is also evident:

*I don’t think that quality is something that just sort of comes out of the ground...I think its defined by certain bodies (R2).*
One interesting view juxtaposed a new and a traditional view, with the implication that while each has a part to play the traditional view should dominate.

Quality is one of those weasle words which ostensibly means something different from what it did when I set out in academia. Quality meant quality as opposed to quantity...now its predominantly about process. I don’t dispute that process is important but I will always argue categorically that its secondary (R1).

The term ‘weasle word’ is particularly interesting because implies that the newer interpretation has a superficially reassuring tone but it is often used as a fig leaf to cover up major shortcomings in the system:

At the end of the day you go through and say did you do this and that and no questions are going to be asked (R1.)

Theme: Customers
The notion of ‘customers’ occurred for one respondent in the commercial sense defined earlier in the Study:

I personally believe quality is meeting some customer requirements and therefore the key is to know who the customer is and I guess what your product is (R8)
I see the student as our main customer (R5)

This notion was explicitly rejected by another respondent:

According to the rhetoric quality is defined as what the customer wants...God knows who the customer is in education (R4).

These three respondents teach quality management. It is not surprising that they all make explicit reference to the role of the customer in the definition of quality but it is of interest that R4. vehemently rejects this interpretation in the context of higher education.

Peer Group Conceptions of ‘Standards’
The issue of standards was introduced in slightly different ways. Sometimes there was a ‘seamless’ transition because the respondent introduced standards in the development of their ideas on quality. In other cases there was a natural completion of the first phase of the interview and standards were introduced via the question; The term ‘standards’ is frequently used in national and local debate on higher education with the phrase ‘quality and standards’. What do you understand by the term ‘standards’?
Theme: Academic Standards
Not surprisingly academic standards came through the majority of interviews as a dominant theme linked with the judgement involved in assessment. It is interesting to note the persistent concern with ‘falling standards’:

*I see standards as the metric for quality and I think that standards have fallen. I see our attempt to construct standard systems as suggesting that our traditional systems have failed. What you are trying to do now that you weren’t doing before – you know...given the nature of our mass education system some independent notion of standards is becoming important. In a recent exam. board someone from the Registry thought that another board would have condoned a student with 36 and [named colleague] came in with “No we say its 36 and that’s where we hold our standards” (R7.)*

The connoisseurial aspect of judgement is often evident:

*If you are aware of all the different things you are looking for in the whole piece then you get a sense of where it is coming from...maybe the sentence construction isn’t very good but something else is really fantastic and within your mind you mix all these things up like in a little pot and say this is a 2:2 or this is a 2:1 – definitely you can do that. It simply takes practice. I definitely feel it comes from a feeling, it comes from experience. (R2.)*

It is interesting to note that the above respondent (R2.) had no difficulty regarding the students as customers elsewhere in the interview but obviously separated implicitly the judgement function from this view.

Elsewhere the concept of academic standards was acknowledged to be both real and intangible:

*Hmmm define standards! Its a bit like an indifference curve, we know its there but you can’t actually feel it in hard reality. Or consumer surplus, which is such an important concept but so difficult to measure (R3.).

Q.. Does that mean that when you see ‘standards’ its ‘academic standards that you automatically think of?
Yes (R3.).

Finally there is evidence of straightforward confusion coupled with a somewhat fatalistic acceptance that there’s little that can be done:

*I get more and more confused by what standards mean, and we are under enormous pressures to let people through (R4.).
Standards relate to the overall quality of the degree. Such things as the gold standard – what’s a 2:1 nationally- the concern with slipping standards. The best we can do is loose benchmarking. (R10.)
A standard is a measure of something. We’re looking at standards nationally and internationally with concern that the British system may be sinking into the sea (R9.)*

Theme: Competition
In two interviews there was an interesting view that falling academic standards was the competitive mechanism used to recruit the required number of students:
If standards are being manipulated in order to achieve targets then that is a dangerous area...commercial pressure is coming to bear because obviously universities are competing. (R8.) The Directorate wants certain things to happen so its all about what we want as educationists while still remaining competitive. (R10.)

**Theme: Duality**

Duality relates to the juxtaposition of academic standards and process based interpretations and for one respondent the transition has been sudden:

I am not even sure that people are primarily concerned about academic standards anymore. I mean I think they would much rather talk about quality and so on, and that is what I find very disconcerting...Someone decided it was going to be different and [snaps fingers] it is different! What is so funny about all this is that they are quite surprised that some of us actually mind about these things. (R1.)

Elsewhere there is graphic evidence that the audience for the dual interpretations is very different and the academic interpretation again involves professional judgement:

You are often trying to convince people who are not academic and because [of this] you put it all down in bullet points in a little booklet and then they look at it and say “oh that’s good so overheads are used in over 95% of lectures, no tutorial session ever has over 15 people “ etc. (R2.)

Q. But what if the external body is composed of academics rather than people who are going to be content with the relevant boxes being ticked. What then?

Then I think you would have started with a completely different set of standards. (R2.)

I’m not quite sure what is meant by this term academic standards because to me standards means some sort of criteria, specification and these simply don’t exist. I mean one talks about standards but in an undefined way. They are undefined in a curiously effective way in the sense that two of you mark a project completely blind, compare marks and find you are within 3 or 4 percentage points of each other. Nobody has actually sat down and specified what represents 2:2 or 2:1 work but somehow, at least for those who have been in the field for a number of years, we simply know intuitively what these are. Standards in a quite different sense is meaningful. If student questionnaires require you to get a certain standard of teaching then you actually have something definable there. (R11.)

**Theme: Specifications**

Specifications relates to the earlier account of ‘standards’ in the non-academic sense, that is all the factors that are less subject to connoisseurial knowledge:

Standards can be easily applied to the administrative side as it were. Standards in terms of how second marking will be done,...how fast they’ll get feedback...how many library books...tutoring arrangements. (R5.)

Well you have standards imposed internally by individuals. I have my own standards which might be different from your standards. It is because of the kind of person I am. You have standards imposed by the institution and then you have standards imposed by governing bodies. If I was going to draw a diagram I would put in all the different standards and put quality as the circle surrounding all those standards. (R6.)

Um...yes I suppose. My only concern with that is what you include under the word ‘academic’. If you put ‘academic’ against ‘skills’, I’m perfectly happy that you argue that business students – managers- have the ability to do something. I think that our ability to actually measure management skills is limited so we resort to academic standards as a kind of surrogate....In medicine you can’t be a doctor without having achieved some standard in your education, but you can be a manager having achieved anything you like. (R7.)
Well going right back to the very old definition of quality meeting requirements, standards are contained in the documents which define the requirements. The problem is I think there all sorts of standards...internal standards, external standards, accreditation standards. (R8.)

The above respondent was in fact the only one who mentioned particular non-academic 'standards'.

Peer Group Views on the Assurance of Quality and Standards

The point that was made in the earlier part of this Study emphasised the de-professionalising nature of systems which attempted to make explicit and to control, dimensions which at least in some areas are necessarily subject to a trust relationship. However the contested nature of the trust relationship in the external and internal policy forum should result in specific responses from the peer group.

Theme: Approval

Approval refers to the view that quality assurance procedures are both necessary and helpful:

- Its ensuring you do what you say you will do. Whatever standards are being applied to you are no longer academic standards they are imposed on you by the University and external bodies. I have no problem with that other than the fact that I don't think the University is set up to cope with it on a regular basis. We are getting better at it and the external audits will certainly force us to be more consistent....The new ISO 9000 is more process focused and might be easier to apply in an academic environment. (R8.)

- The second respondent approving of quality assurance procedures conceived of a clear link between relativist interpretations and a dated regulatory regime.

I think it [quality assurance] is essential. I go back to the old CNAA business. I mean people used to moan about the CNAA system but I used to be impressed by the outcomes of that, and I think we did end up with a lot of very good degrees which were coherently structured, carefully thought out and so on. To the extent that these new systems are replacing the CNAA then they are essential. It leads you to think about what you are doing and how you are doing it. (R11.)

Theme: Documentation

The documentation theme signals implicit or explicit disapproval of quality assurance processes embodying grudging compliance in an environment where there is little time to do things properly:

- Well I'm quite prepared to tell people about students' marks with a brief record of what happened. ...a simple record of what has happened is enough. What the system should be concentrating on is manifest failure, but what you have got to do is just fill the files up, it is a nonsense. But its more of an irritant because the rest of the workload has escalated so much. (R1.)
One of the strongest views both in the way individuals voiced their concerns and in terms of the number who mentioned it was the sheer volume of documentation:

*This process gets corrupted by the paperwork....quality assurance produces masses amounts of documentation which tends to dispense the obvious at very great length.* (R4.)

To me it's the bureaucracy. Its just ensuring that you have the paperwork to back up what you as a professional academic see as your day to day role... Of God! It seems like every day there's more. It is showing that you're closing loops. You know, to me it takes away the professionalism of the job.... because you have got to prove that you are doing this. There doesn't seem to be any time to stop and reflect - you're constantly fighting paper. (R6.)

Not only are there large amounts of documentation but it is not thought to be directly relevant

*My opinion is that we have a quality assurance structure which doesn't have any real measures of quality. Its an ISO 9000 problem where we do this and we do that but you have the problem about how its actually raising standards. The systems allow you to write down the standards without ratcheting them up....* To my mind it [the University's quality assurance system] evokes a large centralised system of monitoring, not of help and support. That's what it evokes in me. (R7.)

Finally there is direct evidence of low levels of ownership in the process:

*We have a lot of traditional academics here who are being asked to play an industry game without being trained in how to do it..... If people are always rushing to get something in, the ownership factor gets reduced. There's nothing of them in it. A lot of University documentation doesn't refer to people... there's no people ownership... We could have documentation which fills a room but if people don't relate to it... you've lost motivation and goodwill* (R9.)

**Theme: Optimality**
Optimality refers to quality assurance systems that have just the right amount of documentation on what needs to be accomplished. This code was originally included in the 'Documentation' theme but, on reflection, it was felt interesting enough to separate, because it also offers a positive solution to excess bureaucracy:

Q. *Can I come back to the point you made about your industrial experience when you mentioned design engineers were a nightmare. What exactly was the difficulty?*

The administrative process can be put in a clear procedural document but if you try to define a process for a design engineer it is extremely difficult because they all approach design tasks in a slightly different way. You can have general procedural guidelines but you cannot have a defined process. (R5.)

Q. *How difficult was it to get the balance right?*

Very very difficult and I was not very good at it..... The professional environment which is teaching means getting guidelines on as few sides of A4 as possible. (R5.)

We do an awful lot of this don't we! Putting systems into place is easy but ensuring compliance is much more difficult. I think we're in danger of evaluating ourselves into oblivion. We're losing touch with spontaneity in this Tayloristic system. We'll end up as control freaks! [laughter] (R10.)
Peer Group Views of Quality Enhancement

In some respects quality enhancement is the most opaque of the four concepts that are the focus of this Study. Respondents are expected to have firm views on quality because it represents a leitmotif in both academic and non-academic discourse. Standards will be a central focus of higher education at least in the sense of academic standards and quality assurance is a dominant feature of external and internal regulation.

Quality enhancement is not a phrase that links obviously with relativist commercial quality systems because the latter focus on quality ‘improvement’ when performance approaches specifications. It could be claimed that quality enhancement is simply the educational equivalent of quality improvement but this would imply that there are no ‘vertical’ connotations to quality enhancement. The ‘best practice’ overtones of the latter make this a dubious course of action. Thus quality enhancement implies, at least in some respects, that we are trying to do something ‘better’ by emulating ‘best practice’. These terms are in parentheses because there is a degree of ambiguity involved. Quality improvement is less ambiguous because there is a market test related to customer involvement and ultimate profitability. There is no direct market test in higher education for reasons that have been discussed above.

However quality enhancement is widely used and understood by educational practitioners involved in the theory and practice of education, not least by those members of the profession who are officers of national regulatory bodies or university employees with responsibilities for the operation of quality assurance systems. In this context quality enhancement relates to a range of concerns including pedagogic practice and ‘standards’ linked to widening access, competence and skills based learning, and an important range of ‘transformative’ equity-related issues.

Theme: Improvement
This theme echoes ‘Striving’ in the Quality section above.
Its about ourselves - how we keep up to date. (R10.)
Provided you have clear criteria for what you’re trying to do and you get closer to doing it then that’s quality improvement. Students’ satisfaction surveys and a rigorous external examining system [are also ways of measuring the improvement]. (R4.)
It relates to the process of sifting out the materials that are relevant to undergraduates which then hopefully raises the quality of teaching and learning. [The respondent recently reviewed a course by] looking again at the materials I was using and thinking about what I was trying to do. I approached it in a completely new way which seemed more relevant...I felt the whole quality of that course was raised. (R11.)
My understanding of it is this continuous circle - a never ending process - there’s always something you can improve. Best practice and benchmarking - all those sort of issues. I suppose the circle just gets wider and that is where the enhancement comes in. (R6.)
I suppose it means how we make the learning process better for students.
I think it links with what I said about focusing on individual development, which is quite difficult in this mass educational system. (R7.)
In the commercial sense I’d call it quality improvement – continuous quality improvement. Here the new ISO 9000 system requires firms to commit to continual quality improvement but it doesn’t define continual. (R8.)

Theme: Resources
To some extent the ‘Resources’ theme came as a surprise in the context of quality enhancement. The author’s involvement in the quality assurance ‘industry’ has obviously resulted in a cue taken from the regulatory bodies who focus on the important but relatively low cost aspects of enhancement, that is, pedagogic and assessment innovation and best practice. The respondents in the Study had other priorities:

I don’t know...[laughter] I suppose I’m going to sound like a typical public sector worker but to me quality enhancement means getting me to work harder for no more money. [long pause]. In a positive way, if they were to do this properly, it would mean them [senior University management] hearing what we’re saying. Like when we tell them about problems with the computer systems for generating assessment information for exam. boards they would go “Gasp! – that’s so terrible! Not only is that unacceptable in itself but so is the stress that all of you must be under trying to work under those conditions. We appreciate that it must be affecting the quality of your work in other areas” (R3.).

For other respondents there was more of an air of resignation:

In the academic sense I’d see it as doing better with the limited resources at out disposal – this is bound to make things better for the students. (R8.)
It means having the time and resources to do the job better. Actually physical resources don’t bother me because I’ve never had them! [laughter] We work in a less than suitable environment, flaking paint, blocked drains etc. Its about what we need to do in terms of care and support of the learning environment. (R10.)
I suppose it means ways of doing things better – but I’m really not sure it does. It could relate at the unit or course level in which case I suppose we’re responsible, but we’re so constrained by the demands being placed on our time. Managers have a responsibility to provide us with the time and other resources to do things properly. (R1.)
APPENDIX 2: SEQUENCE OF MAIN EVENTS IN THE POLICY PROCESS

<table>
<thead>
<tr>
<th>Date</th>
<th>Event</th>
<th>Significance</th>
<th>Document</th>
</tr>
</thead>
<tbody>
<tr>
<td>1992</td>
<td>Passing of the Further and Higher Education Act</td>
<td>All of HE embodied a single regulatory framework. HEFCE established, the CNA headquartered abolished</td>
<td>The Further and Higher Education Act.</td>
</tr>
<tr>
<td>1992</td>
<td>Creation of the Higher Education Quality Council</td>
<td>The body 'owned' by the universities with an institutional (quality audit) rather than the subject (quality assessment) focus of the HEFCE.</td>
<td></td>
</tr>
<tr>
<td>1994</td>
<td>Speech by the Secretary of State for Education [John Patten] to the HEFCE Conference.</td>
<td>Drew attention to the need to maintain comparability of academic standards in a given subject across institutions.</td>
<td>Unpublished</td>
</tr>
<tr>
<td>April 1994</td>
<td>Publication of CHES Report</td>
<td>Commissioned by HEFCE as an analysis of the issues relating to the ‘profiling’ of provision</td>
<td>Assessment of the Quality of Higher Education: A Review and an Evaluation</td>
</tr>
<tr>
<td>December 1994</td>
<td>Refined method of quality assessment</td>
<td>Universal visiting and profiling of provision involving six aspects graded from 4 to 1</td>
<td>The Quality Assessment Method from April 1995</td>
</tr>
<tr>
<td>1996</td>
<td>Disestablishment of the HEQC and quality assessment divisions of the HEFCE</td>
<td>An end to the dual agency approach with its duplication and overlap of functions.</td>
<td>Joint Planning Group for QA in HE: Final Report</td>
</tr>
<tr>
<td>1997</td>
<td>Establishment of the Quality Assurance Agency for Higher Education [QAA]</td>
<td>Unified the functions of the HEQC and the quality assessment divisions of the HEFCE</td>
<td></td>
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<tr>
<td>July 1997</td>
<td>Publication of the Dearing Report</td>
<td>Cross party support for report on purposes, structure size and funding of HE over the following 20 years</td>
<td>Higher Education in the learning society</td>
</tr>
<tr>
<td>March 1998</td>
<td>QAA begins consultation on its 'Agenda for Quality'</td>
<td>Beginning of the implementation of the main recommendations on quality of the Dearing Report</td>
<td>Higher Quality, Vol.1, No.3.</td>
</tr>
<tr>
<td>2000</td>
<td>Publication of QAA’s Academic Review system</td>
<td>Integration of previously separate subject and institutional review systems. Explicit reference to qualifications framework, benchmark statements, programme specs. and code of practice.</td>
<td>Handbook for Academic Review</td>
</tr>
<tr>
<td>July 2001</td>
<td>Consultation sought on a proposal to end subject review in favour of ‘lighter touch’ system of institutional audit</td>
<td>Possible end of subject review as HEFCE led document emphasizes need for ‘lightness of touch’ following apparent political acceptance that Academic Review system was too burdensome.</td>
<td>Quality Assurance in Higher Education: Proposals for Consultation</td>
</tr>
<tr>
<td>March 2002</td>
<td>Codification of the process for external review</td>
<td>Confirmation that universal subject review was to be ended in favour of</td>
<td>QAA external review process</td>
</tr>
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<td><strong>March 2002 and October 2003</strong></td>
<td><strong>Publication of the information set that would be available for each English higher education institution with degree awarding powers</strong></td>
<td><strong>institutional audit to begin in February 2003. Policy process appeared to have come full circle back to methodology pioneered by Academic Audit Unit prior to 1992 for higher education in England: Operational description</strong></td>
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<td>Higher Education Research Opportunities (HERO) becomes the official gateway site to the UK’s universities, colleges and research organizations (<a href="http://www.hero.ac.uk">www.hero.ac.uk</a>). This site contains teaching quality information (TQI) in a common format to inform potential students of the standards and quality of institutions’ provision. It is intended to enhance the search qualities of the higher education service.</td>
<td>Information on Quality and Standards in Higher education (The Cook Report) HEFCE 02/15. Information on quality and standards in Higher education. (Final Guidance)</td>
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APPENDIX 3: INTERVIEW PROTOCOL AND TRANSCRIPTS

INTERVIEW PROTOCOL

Nature of Interview: Semi-structured

Maximum Length of Interview: 45 minutes

Recording Mechanism: Manual note-taking

Purpose of Interview: The interview has two purposes. Each interviewee has been chosen because of their role in, and knowledge of, a specific and distinct aspect of the policy process under investigation and this is the primary focus of each interview. In addition, the interviewee's views on wider issues and policy events is valuable particularly where details of these events are otherwise hidden from public view.

Accuracy Protocol: The transcript of each interview will be sent to the respondent within fourteen days of the interview for checking and modification as necessary.

Confidentiality Protocol: The identity of respondents will, with their explicit approval, be disclosed only to Professor Gareth Williams [Supervisor] and to the Examiners selected by the University of London. The text containing the names of respondents will not be bound into the thesis. All interview transcripts will be presented in an appendix to the thesis. The transcripts will be anonymous with each bearing the heading ‘Respondent I(...N)’ where the number reflects the order in which the interviews were taken. Where the content of a transcript is used in the thesis, the referencing procedure will be identical to that used for published sources. It may be the case that, in some interviews, respondents disclose information about either themselves or other participants in the policy process. The relevant transcript will not contain this information.
Respondent 1.

Q. The beginning of the period saw the Further and Higher Education Act in which quality assurance rather than academic standards held center stage, how did you think that quality was being interpreted at that time?

Quality wasn’t really very well defined. I suppose the most common interpretation was fitness for purpose. Mission particularity was also important but it begged the question of whether all degrees should have the same standards. I don’t think the idea of fitness for purpose actually worked. There was no real drive in the institutions to be diverse – the ex-polys wanted to be as like the old universities as possible.

There was a kind of gentlemen’s agreement on standards – there was certainly no external pressure on standards – that came a little later. Wasn’t it John Patten who went to the Far East and came back with the news that there was concern about the standard of British degrees being franchised there? This caused a crisis regarding standards.

At the time HEQC was developing the theme of ‘managing for quality’ – quite suddenly the agenda switched to graduate standards – the Graduate Standards Project. It was deeply embarrassing – there was disagreement and a lack of theorizing on standards – although there was widespread agreement that the external examining system didn’t produce what it purported to produce. There was a rather indigestible report and a range of advice. It did focus on the effective management of assessment. Explicitness was a key word then and it has led to an expectation of internal cohesiveness.

I think there was a feeling that the HEQC response was not really satisfactory. The Graduate Standards Project was more about the nature of higher education in general than the standards of awards. Its difficult to tell whether there’s any relationship between this [disappointment over HEQC response to Patten] and the collapse of HEQC.

There was a big difference between the approach of HEQC and the QAA. The Government wanted this different approach. The QAA under John Randall was about calibration – it was more about the definition of standards.

Q. What was the HEQC about?
You have to go back to its origins. It was about putting the Academic Audit Unit on a firmer footing – but its approach was conciliatory and friendly. The senior members of HEQC talked to each other. HEQC was always enhancement driven.

They [HEQC] wouldn’t have imposed Codes – advice was the order of the day. It was personal and at a higher level – it never really got down to course level. The HEFCE were the hard men who went in and upset institutions [laughter].
Q. To what extent would you say that the two institutions were complementary—sister agencies but having a different focus?

I don’t think this is an accurate picture. They never really saw eye to eye. They jostled for position and had huge problems talking to each other. Neither took the other into account—they didn’t look at each other’s reports. This changed around 1998.

Q. To what extent was the HEQC really owned by the universities?

Well to some extent it was a separate quango but you shouldn’t forget that Vice-chancellors and Pro Vice-chancellors made up the Board of the Council. I really liked the fact that it was a kind of club of QA people. There was a ‘College of Auditors’ who held ‘Solstice Meetings’—they were a special group who had this important continuing association. Compare this with the HEFCE where members [of a subject review panel] got together only for a specific event. The HEQC auditors themselves had influence whereas in HEFCE it was the Officers and a few review Chairs had power. The QAA is still perplexed about how you bring these two traditions together.

HEFCE is a bureaucracy characterized by elaborate manuals, guides and rules. Its formulaic—reports are almost pre-written with some slots to be filled in. HEQC is a community based on friendship, trust and professional respect—its reports are very colourful and idiosyncratic. It [HEQC] never lost its civilized courtesies. Its staff tended to be more drawn from more senior positions in universities whereas HEFCE tended to have heads of department at best, and people who volunteered. I think there was a feeling that serving on HEFCE panels was not necessarily a good thing to be doing. HEFCE had its origins in the inspectorate—its senior people are all ex-HMIs.

Q. What exactly happened when the QAA was formed—was there much jockeying for position between HEFCE and HEQC?

It’s very difficult to tell. It was certainly very complex. John Randall was very much an outsider to both camps—he had an accreditation background so it wasn’t surprising that the QAA focused on the definition of standards.

I was surprised by two features the QAA—that it was a very friendly professional group of people trying to do a good job and secondly the relatively small number of people in meetings of the Development Directorate. However it shouldn’t be forgotten that its a bit like a spider’s web. The Directorate was at the center of a web that embraced hundreds of auditors.

The QAA brought two really big changes—the attempt to co-ordinate the work previously done by the HEFCE and the HEQC and secondly whole new quality and standards agenda which was hugely ambitious. The Government never really gave the
resources to match this task but said that the Dearing recommendations had to be adopted by institutions.

Programme specifications, Benchmarks and the Code of Practice were all picked up by the QAA. HEFCE were never really serious about consultation but HEQC did have this tradition and the QAA carried it forward. There was a development group drawn from the sector.

Q. What about the sudden end of subject review in 2000 – what exactly happened?
It was a huge shock which I don’t think the QAA saw coming. I think it was a culmination of a number of things. There was always some tension between John Randall and others – for example he and Peter Williams were as different as chalk and cheese. John Randall felt that audit was too soft and over-gentlemanly and he gambled on subject review feeling it was unacceptable to retreat from it. I don’t really know what happened but the general view is that it was a political coup – John Randall didn’t have a clue what was happening.

I think there were discussions between Brian Fender, Diana Warwick and the Ministry – HEFCE backed off the need for subject review. John Randall didn’t accept it and was made to resign.

As a consequence of all this audit veered from an irrelevant legacy of HEQC to being the centre of everything. Peter Williams emerged from being a secondary figure to being a dominant leading light. There’s now a high level of consultation.
Respondent 2

Q. When the binary divide ended in 1992 the regulatory focus changed from academic standards to quality assurance but by 1995 standards were again becoming an issue – did these developments impact on HEFCE’s role in any way?

The Funding Council was not about standards it was about quality of provision financed from public monies although quality was never properly defined. Standards were the concern of the HEQC which was owned by the universities.

The quality assurance methodology came out of the inspectorate whose role was that of safeguarding teaching and learning across the higher education sector. The initial quality assessment team came, with one exception, from the inspectorate but its important to note that they were all committed to moving away from the confrontational inspectorate model of the schools and FE sector toward a methodology which acknowledged HE sectoral norms and aspirations. As this system developed the teams were staffed by people who came from what might be called enhancement based backgrounds.

From 1992 onwards quality is defined tautologically. The recognition of the sector’s individual responsibilities for standards resulted in methodology that was focused upon institutional aims and objectives, so quality was relative not absolute. The recognition of institutional responsibility and the vehement HEFCE view that it was not a planning body also explains why we ended up with a TQA methodology which was independent of standards.

Q. What were the issues that concerned the Funding Council when the transition was being made to a graded profile for provision?

There were grave concerns about the language being used, especially the fact that so much provision was being defined as satisfactory – there was a lot of discussion about the gap between ‘excellent’ and ‘satisfactory’ and this was seen to be damaging to UK higher education. Furthermore the language of excellence is inappropriate when you're not marking against absolute standards.

I was directly involved in the formulation of the grades and in the derivation of the distinction between aims and objectives. Once again the language was important and it became appropriate to define grades relatively and phrases such as ‘scope for improvement’ reflected this relativity. ‘Unsatisfactory’ meant a complete mismatch between assessed provision and the relevant aims and objectives (of the subject area).

The old system was very discriminatory and people still clung on to the idea of excellence. When the graded profiles were introduced there was no intention to focus on the total score – the profile was important and, for example, the appearance of any 2s in the profile was very significant regardless of the aggregated score.
Q. Were you ever under the impression that there was a strong view that teaching and learning needed to be assessed because there might otherwise be a misallocation of universities’ resources in favour of research?
No I don’t think that this was a prevalent view although it was acknowledged that the funding of teaching and learning would inevitably underwrite some of the costs of research. I do know a little about the work of the HEQC at this time and there was some concern about this but I think this was more to do with the passions of the people concerned. Many of the leading figures of HEQC such as Robin Middleton had research backgrounds whereas those in the Quality Assessment Division of HEFCE had teaching based backgrounds.

On reflection I suppose the first Chief Executive of HEFCE emphasized the concept of value for money and, in specific cases this would inevitably raise the operational question of whether institutions were diverting resources inappropriately.

Q. What were relations like at the time between HEFCE and HEQC?
They weren’t good. I think there was a lack of empathy between the heads of the two bodies because they were contesting the same terrain. However when it became clear that the writing was on the wall about a single agency there was more co-operation and sharing of discourse.

Q. Did the transition to a single agency go smoothly?
It was time of enormous instability and anxiety for most of those involved. When it became clear that Bristol was not going to be the location of the QAA, both HEFCE and HEQC leaked administrative and more senior staff quite badly. The embryonic QAA staff struggled to produce a business plan and they didn’t have an operational plan to replace the activities that they had inherited. They had to adopt the existing methodology for quality assessment because they didn’t have anyone who could compose a new one.

I think John Randall thought more of former HEQC than former HEFCE staff. Peter Williams was very influential.

It’s important to remember that HEFCE was a funding rather than a regulatory body – its role was to assure value for money. John Randall wanted to do more than this and was driven by the additional audit imperative. The focus moved to regulating the sector via codes of practice and national qualifications frameworks. The subject benchmark statements finally overturned the generic ‘graduateness’ imperative thing and introduced the first elements of what might loosely be described as a national curriculum.
Q. If we move on now to the sudden end of subject assessment – do you have a view as to what happened?
I don’t know what the facts are but it must be assumed that John Randall lost ministerial confidence in his ability to deliver a cost effective system. Academic review would have needed a significant increase in funding and QAA’s resources were not being managed very well as it was. The CVCP dug its heels in and I don’t think there was any confidence that a way forward could be negotiated.

The language being used by Peter Williams and John Randall in their forewords to QAA documents were starkly different the former consultative and the latter more belligerent.

Q. Finally we have Institutional Audit – what’s your view on this approach to quality assessment?
Well audit doesn’t really offer anything to the student about the quality of what’s on offer. Subject assessment reports were not easy to read but they did at least give some information about relative quality between subject areas which was meaningful.

I think institutional audit provides an ideal way of getting at institutions if the QAA wants to. Jamie Oliver sometimes produces poor quality food but it would be unfair to highlight these occasional lapses but that’s what could happen under institutional audit. I think there are enormous problems with the principles on which its based and its deeply flawed. Its also hugely costly – the true costs are grossly underestimated. Our preparations for institutional audit have involved me and (name of colleague) in 40 hours of discussion to date excluding all the wider meetings involved and we’re 6 months away from the event itself. We’re not really benefiting at all from any of this. I think a sampling system which emphasized good practice would be much more beneficial.
Respondent 3

Q. When did you start this work [formulating subject benchmark standards] for the QAA?
Benchmarking started before the QAA was formed. It began as part of HEQC’s Graduateness project – the Committee of Heads of Accounting Departments had taken part, and there was competition between subject groups to gain control of the process. It wasn’t clear at this time that there was going to be an Accounting benchmark and this [early involvement] was to ensure that there would be. The Association of Business Schools was also involved as was the Board for the Accreditation of Accounting Degrees – this body dissolved later because of internal tensions.

We had good links with the QAA because of our early start and they adopted our approach to subject benchmarking. I was Secretary of the Benchmarking Group.

Q. Did the composition of the Benchmarking Group reflect the status of the peer group nationally?
We went to great lengths to make it representative – including the sub-disciplines, gender composition and so on. The only significant problem we had was the integration of the Scottish system because it was based on four undergraduate years.

Q. How, in operational terms was the benchmark generated?
We had examples from Law, Chemistry and History. There were six meetings – the first discussed the adequacy of the headings – we modified the QAA pro-forma headings slightly and wrote it section by section with a final edit.

Q. Would you say that, in general, there was willing participation in the project?
Yes. There was general agreement about what all accounting degrees should embody. They should all consist of a mix of conceptual and technical material. People should be forced to teach book-keeping, subject specific knowledge and skills. The test that we always had in mind was ‘Is the statement strong enough to rule out a degree programme that is purely technical on the one hand or purely conceptual on the other?’ There were two cases we used as markers – one at (name of Russell Group university) which was entirely conceptual and one at (name of post-1992 university) where students were given a degree for the first nine ACCA examinations plus an essay based on their work experience. Its actually the shortest benchmark statement of them all - we were proud of that. We were also very conscious of the need to accommodate a diverse university sector without being unduly prescriptive. The
statement was very well received by the Accounting community and was actually used by (name of Russell Group university) in the revalidation of their programme. Its provided a valuable framework for the development of the subject.

Q. How useful do you feel the benchmark statement has been for assuring academic standards?
I think it was always going to have a limited effect on accounting degrees because we already had BAAC fulfilling this function.

Q. Generalising the matter, what is your view on the effectiveness of the whole specification process - learning outcomes, programme specifications, benchmark statements etc.?
On the whole it has had a beneficial effect – whether its been worth all of the effort I’m not so sure. I don’t think its changed much in the new universities, they were already doing this but it will have an effect on the Russell Group where there was no control over quality – everybody was allowed to do as they liked. Occasionally a brilliant creative unit may lose its lustre (by having to conform) but many others will have been improved.

Q. Turning to a rather different matter, why do you think subject review ended so suddenly?
I think it was forced on the QAA by the cut in its budget and secondly by the threat of revolt from the Russell Group who were demanding a lighter touch. I think they made sure that the QAA had its budget cut.

Q. Do you feel that the new system of institutional audit will be effective?
I took part in developmental engagements recently and there’s a major difference in the language being used – its now far less judgemental. There’s now far less time available in general, far less evidence to evaluate and less time available for discussion. – in many respects its no longer really an audit.

Q. To what extent do you feel its possible to have an academic audit?
Well the financial interpretation of audit is to seek evidence for the existence of assets – there are difficulties applying this in the academic context. The quality of output is problematic – the students are no longer there – you could of course look at exam performance or coursework but external examiners do that anyway – its difficult to see why you would want to second-guess that process. External examining is fairly subjective but very robust – they can certainly comment on gross failings on courses but there’s no defence against grade inflation and the fall in standards.

Q. How bad do you think it (fall in standards) is?
Of itself it doesn’t worry me but the main problem is that nobody has rethought the role of universities in an age of mass higher education. I’m quite happy giving degrees to thinking plumbers or thinking book-keepers.
Respondent 4

Q. Did the dual agency structure of HEFCE and HEQC come about through deliberate design or was it a manifestation of expediency?
Both. The binary divide was abolished almost overnight so civil servants had the pressing task of implementing the transition of polytechnics into universities. The Government didn’t want to abolish the Academic Audit Unit but it certainly wanted competition between universities – I suppose this could be described as expedient.

However the regulatory system that came immediately after 1992 involved an extension of the principles of the CNAA and HMI to the entire sector – since the polytechnics were accustomed to these principles, this would have a disproportionate impact on the way that the ‘old’ universities operated. The establishment of the HEQC as a body owned by the universities gave policy a degree of continuity.

Q. Was there a feeling in 1992 that regulation was necessary to combat inadequate focus on the quality of learning and teaching?
I don’t think this was a factor. There was certainly a concern for the best use of public funds – there was also a strong feeling that old universities should play the game in terms of responding to government pressured on funding. Remember that there were two episodes where old universities had refused to respond to pressures to take more students by cutting the unit of resource – once again it should be remembered that competition was thought to be very important.

Q. The 1991 White Paper emphasized quality and quality assurance – academic standards wasn’t really mentioned – was this transition from standards to quality a smooth one?
I don’t think its correct to say that standards weren’t mentioned – there was explicit acceptance that universities were responsible for safeguarding their own standards. There was acceptance in the Joint Planning Group that the new quality process should cover standards and quality. This was given away when the QAA was established (and the HEQC disestablished) in 1997 – they’ll never get this back.

Q. What were relations like between the HEFCE and the HEQC?
There wasn’t any rivalry initially because the HEFCE was concerned to deliver the quality assessment system. You should also remember that the Vice-Chancellors were pressing for a single agency – this made co-operation very difficult because if HEQC had done so it would be seen as colluding in this venture. Moreover such collusion might be seen as reflecting agreement with what Graeme Davis and others were
saying about the need to reduce bureaucracy. I very much resented this. It was particularly ironic that the single agency didn’t deliver on less bureaucracy!

Q. Pursuing the issue of the costs of bureaucracy – why was quality assessment dropped in 2000?
I predicted that it would be and it is covered in Chapter 6 of my forthcoming book. It was very surprising that the sector didn’t object more strongly to the relevant sections of the Dearing Report [which subsequently led to the Academic Review methodology]. This failure stemmed from a number of sources; a failure to understand the quality and standards agenda, the desire of the CVCP not to upset the Labour Government, the wish to get funding sorted out.

There should have been a move away from quality assurance towards standards. If standards are appropriate then the rest will take care of itself. There were also certain important developments in the public awareness of the costs of assessment – the joint impact of a report by PA Management Consultants which put a figure on the direct and indirect costs of preparing for assessment, and the article in the Guardian by the Warwick economists which said what a useless process it was and how they had learned nothing from it. Finally, Tony Giddens and Colin Lucas lobbied Number 10.

Q. Returning to the earlier period – what exactly happened when John Patten came back from his trip to the Far East in 1994 and expressed concern for the academic standards of UK degrees?
He certainly got an earful in Singapore and Malaysia about the extent that UK universities, predominantly new universities were going to recruit students onto franchised programmes. I think much of this concern was justified.

HEQC picked up this issue and the CVCP didn’t like it. In fact HEQC had begun to think about this issue before the Patten episode.

Q. The HEQC responded to Patten by developing the Graduateness [Graduate Standards Programme] project, but was this what Patten really meant?
No but I duped him. The GSP was a very ambitious programme and even if you could do it there was no guarantee that the sector would buy it but I bought some time. Dearing traduced the HEQC principles set out in the GSP by converting it into a framework for regulating the sector. John Randall tried and failed to implement it because he was incapable of relating to the universities in an appropriate way. Peter Williams is now trying to mend these fences but it remains to be seen whether he’ll be successful.
Q. What sort of people were in the HEQC?
Well some were from the CNAA – most had worked in the universities at some time. The Development Group had people like Robin Middlehurst and Peter Wright - they were very bright policy wonks! The Audit Group consisted of people who were more administratively orientated but again they were very able. It was a think tank – we’d often sit around a table and brainstorm – the quality of what was published was very high. By comparison the HEFCE were from HMI.

I think its tragic that the sector now has all the bad aspects of the CNAA with none of the good. For example, did you know that QAA have reintroduced the CNAA post of Institution Liaison Officers? Ours even got our title wrong! The quality of discourse is much diminished.

The irony in all of this was that the Government was quite happy with a dual system – it was quite happy to be kept out of quality regulation as long as value for money was being realized.

Q. So would it be true to say that the universities were directly responsible for the disestablishment of the body that was owned by the universities?
Yes.

Q. Why do you think there were such misgivings in Dearing about the robustness of the external examiner system?
There was such a view in the Dearing Report but you should also remember that Dearing advanced the recommendation for a registered external examiner as part of a national system for regulating the universities. Moreover the pressure to convert external examiners into a national cadre hasn’t gone away. For its part HEQC didn’t believe in the external examiner system and we’d have recommended its abolition.

I find it particularly disappointing that John Randall took a Rolls Royce outfit like the HEQC and dismembered it. There are two natural functions for an agency – the regulation of standards and quality enhancement – HEQC tried to do both but now they are split.

The determination to site the new agency in Gloucester and the refusal to devise a system of work that would retain a crack team of really bright people was most unfortunate. I think he wanted to be the OFSTED man for higher education.

Q. In an important sense the HEQC agenda has been vindicated by the decision to focus on Institutional Audit – we seem to have come full circle since 1992 – is the current audit concept one that you could support?
Audit has certainly changed and maybe there’s a sense in which it is not accurate to call it audit at all. The traditional idea of audit involves the three questions;
What are you doing?
Why are you doing it that way?
How do you know it works?

I think this was a good approach but we didn’t really run it for long enough. If there had been a second round of audit my idea was that you would go back to the original universities such as Oxford and Aberystwyth and see what had happened since the first audit. The key issue is how do you produce a system that you can’t traduce.

Self-regulation is by far the best method. I think comparability of standards is a nonsense. Even if you have the same curriculum there will be inevitable differences between one institution and another. I’m horrified that universities still think it appropriate to leave standards to their external examiner.
Respondent 5.

Q. Do the Self-Evaluation Documents differ very much in terms of the complexity of QA processes they reflect?
There’s a problem here in that I’m a trained subject specialist rather than an auditor. That having been said the SEDs will still follow the six key areas. I’ve never seen a perfect SED but in general they are well written and there are common guidelines. If there’s one problem it’s related to their focus on facts rather than critical assessments. Nevertheless they are excellent starting points which together with the university’s handbook and the students’ handbook give you what you need.

Q. To what extent are universities free to specify their own quality assurance system?
I think this is changing. There was a time when they were free to do this and you got a degree of diversity but now we have programme specifications and we benchmark against established conceptions of best practice. I do remember at .... University they had a minimal central QA function with the departments given a great deal of scope as to how they adapted benchmarked processes to suit their own needs. However at my own university they have gone for uniformity in a big way by running things from the center. It remains to be seen whether this will be successful at Institutional Audit.

Q. Is there a ‘lighter touch’ now?
Well the QAA gets the same amount of time to audit the whole institution as there used to be to assess a single subject area. From the standpoint of the universities there’s a lot of preparation – everyone within each university prepares because they don’t know if they are going to be subject to an audit trail. I do suspect that there may be a difference between old and new universities in this respect with new preparing more than old but I don’t have evidence because out of six audits I only got one old university. I did wonder whether reviewers from old universities audited old universities and vice versa. What I am certain about is that institutions are not treated any differently by auditors.

Q. The QAA refers to the use of specialist advisers who are used whenever there are very good aspects, or aspects that are giving rise to concern. Did you have any experience of their use?
Not really. I did experience a particularly difficult visit when we went to .... University and they had recently closed the .... subject area. There was hostility as soon as we arrived and some of the meetings became a slanging match. They had a degree which took students who couldn’t cope with a more advanced programme. The QAA was evaluating progression rates and still defined those who took the lower level course as having failed to progress. The staff were really angry about this interpretation saying that we should be auditing their system rather than what we thought should be their system. The result was appealed and the whole thing was
reviewed by the QAA – we had to go over our methodology accounting for the way we did things but no-one went back into the university.

Q. Who do you actually meet when you go into the universities?
We start and end the visit with the University’s senior team – the Vice Chancellor and Pro-Vice Chancellor responsible for audit plus the Deans and Heads of Department for the selected disciplines. In the middle you’re dealing with course teams and students. The subject review is shortened – 2 rather than 5 days.

Q. Do you feel the process is consistent and reliable?
The handbooks that are submitted are uniform. Information is checked – triangulation is the term used – what is said is checked by evidence from students and employers. There’s a division of labour among the visiting team and your summary has to be evidence based usually from what is published. It has to be verified e.g. someone actually said it.

Q. What is your gut feeling about the effectiveness of the whole process?
I was skeptical when I went in. The training course was the best I’ve ever experienced and this changed my mind. I liked the QAA – people were genuine and committed to what they were doing. My first visit was the most difficult but as you do more you get more skilled at it. Out of six chairs that I’ve experienced only one was not up to the job – you’re always asked to critique the Chair. The process is as effective as it could be. Institutions are given every opportunity to correct and respond – its very fair and I think the Chairs must take a lot of the credit for this.
APPENDIX 4: The Particular Issues relating to the Credit Rating of Postgraduate Awards

The Dearing Report had earlier signalled that one of the most pressing problems for the NQF was to reduce the confusion that attended the proliferation of awards that carried the Masters title. In England a Masters degree could mean an extended undergraduate programme such as M.Eng., a postgraduate conversion programme, a specialist programme or finally an award in the Oxbridge tradition where no additional work had taken place.⁷⁹

There were two interpretations of ‘standards’ embedded in Dearing’s concern about the postgraduate situation; the use of the masters title for a programme that is acknowledged by the sector to be at undergraduate level [Type A], and secondly the use of the masters title for postgraduate awards which were not of an appropriate standard of intellectual rigour [Type B]. Quoting the Harris Report Dearing states;

...although there had always been diversity in postgraduate titles, it had reached the point of being unhelpful, and in a number of cases it was positively misleading. We concluded that this situation had arisen as a result of a ‘market system’ operating during a period of increased demand for postgraduate qualifications without an adequate framework or control mechanism. The problem of reliance on such a market system is that by the time the market has corrected the worst examples of ambiguous standards, damage may have been done to the whole sector. (NCIHE, 1997; page 144, para.10.11)

It is difficult to be categoric about exactly which variant of masters award was being led by the market, the probability was that it related to so called conversion programmes. Extended undergraduate masters and those in the Oxbridge tradition had a well established position within the English system. That was not to deny that they should be re-examined as part of a policy to rationalize titles but simply to distinguish them from those Type B awards which have proliferated under the ‘market system’.

Dearing was signalling the need for change in an area that would have major significance for the universities if it resulted in their being unable to offer masters

⁷⁹ Dearing is here developing the policy implications of the Harris Report on postgraduate education.
programmes to candidates who had not completed an undergraduate award in the relevant subject area. The way that the QAA implemented this policy would inevitably have strong political ramifications.

The rationalization of titles is certainly linked with the NQF but not necessarily an issue of credit rating. In fact the standards dimension of the policy cycle can be usefully analysed in the context of credit rating of postgraduate awards. Dearing expressed particular concerns about the academic rigour of some English postgraduate awards singling out the MBA for particular mention.

<table>
<thead>
<tr>
<th>Table A1.1 QAA Policy documents relating to the development of the National Qualifications Framework</th>
<th>Date</th>
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<tbody>
<tr>
<td>Document 5. The framework for qualifications of higher education institutions in Scotland</td>
<td>January 2001</td>
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In Table 6.1., Documents 1 and 2 are for consultation prior to the consequent policy contained in Documents 3 through 5. The changes between these two phases of policy development in England, Wales and Northern Ireland are profound as both the fourth undergraduate year and the credit rating of qualifications were dropped.

Document 1 contained a comprehensive credit definition of awards which conveyed important policy markers for both level and volume of provision. In the case of postgraduate qualifications the force of the Dearing recommendations led to considerable interest in the QAA’s proposals for masters degrees in particular whether the ‘conversion’ variant would survive.

There was no surprise in the credit rating of 180 for a one year Masters degree, but the recommendation that not all such credits need be at Masters level was interesting.
More specifically 150 credits were suggested at Level HE4 [Masters], leaving 30 credits at HE3 [honours degree]. This provides an obvious mechanism for providing a conversion component and suggested that the programmes that were the subject of Dearing’s warning about the ‘market system’ would survive.

The case for the ‘undergraduate Masters’ was less clear cut. International acceptance of particular degree titles was given voice by the Bologna Declaration involving signatories from the majority of European countries inside and outside the EU. At the heart of the Declaration is the need to be unambiguous about the distinction between ‘first and second cycle’ qualifications, namely whether they are undergraduate or postgraduate. A Masters degree is a second cycle qualification so undergraduate Masters pose obvious difficulties. Dearing’s suggested designation of ‘higher honours’ has not been enthusiastically received. At the time of writing the issue is still under discussion but early indications are that both the higher education sector and the relevant professional bodies wish to retain Master in the title and will need to specify fourth year work at that level.

Professional doctorates were not an issue in the Dearing Report but they do reflect some interesting aspects. In Document 1, credit rating of the Professional Doctorate is a total of 540 with at least 420 at Level HE5 [Doctor]. Whereas conventional and conversion Masters degrees were unproblematic, there was rather more uncertainty about the Professional Doctorates. Total credits of 540 was straightforward but the minimum number at HE5 provoked debate with strong support in some quarters for 360 rather than 420 at that level.
Appendix 5: A System for Managing Quality at Departmental Level

The Engineering Professor’s Council Quality Management Project (1996) with, among others, the HEQC and HEFCE as sponsors and supporters asserted that;

Guidance on quality management is available at university level, but comparatively little guidance has been available concerning the departmental quality management arrangements to fulfill institutional and external expectations and requirements. 80

The EPC system specification;

... takes account of the relevant sections of the HEQC Guidelines on Quality Assurance which is the definitive document for institution-level quality management in the UK... 81

The EPC document is interesting from a number of standpoints. Its authorship represents the agencies as well as representatives of the engineering peer groups and it is therefore not surprising that the rhetoric of the text reflects that of both quality and academic standards. Care is taken to define the terms used in accordance with ISO 8042, and extensive efforts are made to embrace the ‘exhaustive’ approach of commercial quality management systems. The result is 22 specifications cross matched with evidence from 70 documented records. The most important aspect of the EPC document is this insight into precisely what is required to implement a quality assurance system within a department and to subsequently link this with the rest of the institution and to external agencies. Three dimensions are specified by EPC

a. Internal vertical relationships which link the department to the faculty or school, the university and to peer networks outside the discipline (e.g. internal quality audit, validation and course review processes)

b. Internal horizontal relationships which link the department to other parts of the university which have responsibilities for the quality of education, support the students learning experience or provide essential administrative services.

c. External relationships which link the department to peer and... practitioner networks in its discipline and which support the department in maintaining and enhancing the quality and standards of education.

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80 EPC (December 1996), Specification for a Quality Management Framework at Departmental Level, [EPC Occasional Papers, No.9], page 3.
81 Ibid., page 3.