Thesis Title -

In what ways are quality assurance professionals in England responding to the regulatory changes under the Higher Education and Research Act, 2017, and what are the implications for the quality assurance of higher education teaching and learning? A social practice approach.

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June 2023

This thesis is submitted in partial fulfilment of the requirements for the degree of

Doctor of Philosophy

Department of Educational Research

Lancaster University

UK

Abstract

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In what ways are quality assurance professionals in England responding to the regulatory changes under the Higher Education and Research Act (2017) and what are the implications for the quality assurance of higher education teaching and learning? A social practice approach.

In opening up higher education to the market and introducing the Office for Students, the Higher Education and Research Act (2017) (HERA) has created a quality assurance system in England which diverges from the rest of the UK and Europe. This qualitative study explores the enactment of policy change and its implications for the quality assurance of teaching and learning. It uses social practice theory (SPT) as the theoretical framework. Methodologically, 20 interviews were conducted with quality assurance professionals (QPs) from 20 higher education institutions and analysed thematically.

The key findings related to the changing roles of QPs and the variations in their responses to the HERA. The majority claimed to occupy a third space between administration and academia, which shaped their professional identities and contributed to membership of a strong community of practice centred around the Quality Assurance Agency's Quality Code (2013-2017) and the *Standards and Guidelines for Quality Assurance in the European Higher Education Area* (ESG). Two principal issues emerged as a consequence of the HERA: the authoritarian approach of the Office for Students (OfS), and the replacement of cyclical peer review and enhancement with metricised accountability. Responses ranged from the acceptance and implementation of outcomes-based internal monitoring to the operation of a dual system, designed to meet the data requirements of the OfS while maintaining existing enhancement activity. Many were however reconstructing policy, bringing internal monitoring and data management together to enhance provision by changing institutional structures, systems, staff and skills. In most cases, policy was being enacted in

a constructivist way, demonstrating that change needs time, support, and differentiated approaches to the socialisation of institutional microcultures. The capacity to effect change varied, indicating that quality practices may become increasingly diverse under the revised Quality Code (2018), with the potential to fragment the community and obfuscate the meaning of quality and the purpose of quality assurance. Rather than dismantling the structures underpinning sustainable change, the OfS should harness the expertise of the whole QP community to co-construct quality assurance practices in new and more creative ways which unite enhancement and accountability.

The study has brought new knowledge to the mechanisms of policy enactment in quality assurance at the under-researched meso level of the institution, giving expression to a voice which remains under-represented in higher education. It has also extended the usefulness of SPT into another area of higher education research, offering a framework for policy enactment at a critical juncture in the development of higher education quality assurance.

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Acknowledgements

I am grateful for the support of many people in enabling me to realise a long-term ambition in undertaking this doctorate. I would firstly like to thank my supervisor, Dr Janja Komljenovic, for her valued insight, advice and encouragement; Dr Ann-Marie Houghton for her ongoing guidance, positivity and good humour; and the Educational Research team for their administrative and technical assistance.

I also want to recognise the work of UK higher education quality assurance professionals and to thank both those who generously participated in the study and Dr Rosh Swift, who encouraged me to enrol on the DPER programme and whose continued friendship has helped me to complete it.

Finally, my thanks to Peter, who is - by name and nature - my rock and has contributed to my achieving this outcome in more ways than he will know.

Author's declaration: The thesis is my own work and has not been submitted in substantially the same form for the award of a higher degree elsewhere.

Signature

Chapter 1 Introduction

This chapter sets out the aims and rationale for the study and the research questions arising from the unprecedented changes taking place in higher education quality assurance in England. It provides an outline of the socio-political context and summarises the theoretical position and methodology adopted. It explains how the thesis contributes to existing knowledge about higher education quality assurance and my personal motivation for undertaking the study.

1.1 Aims and rationale

The stimulus for my thesis was the introduction of the Higher Education and Research Act (HERA) in 2017 (DfE, 2017). After a long period of relative stability, 'the first major regulatory reform to the UK higher education sector in 25 years' (UUK, 2017, p3) means that the quality assurance of higher education in the UK is in transition. My thesis focuses on the effects of the HERA on the quality assurance of higher education teaching and learning in England, where the HERA has allowed for differentiation from the three other UK jurisdictions. The regulatory changes introduced by the HERA include:

- a new regulatory body, the Office for Students (OfS) and a transfer of responsibility from the Quality Assurance Agency for Higher Education (QAA) to the OfS for making judgements/issuing 'conditions' about HEI quality and standards
- regulations designed to increase competition and choice in the sector, and to make it easier for higher education providers to be granted degree-awarding powers
- a revised Quality Code which focuses on outcomes rather than processes and makes the 'enhancement' of the student experience optional for HEIs in England
- replacing cyclical peer review with a risk-based methodology, predicated on metrics, and a review method which substitutes 'experts' for 'peers' and removes the student reviewer.

The changes are in response to the ongoing massification and marketisation of higher education, which has expanded provision and encouraged the increase of private providers within the sector (Middlehurst, 2016; DfE, 2017), but simultaneously given rise to public concerns about unregulated providers (Fielden and Middlehurst, HEPI, 2017), grade inflation and academic standards (Bachan, 2017), and the capacity of the existing regulator and quality assurance system to meet these challenges (Education Select Committee, 2008).

This study is therefore timely, coming at a critical juncture in the development of higher education governance, where policy change not only separates quality assurance in England from the rest of the UK, but also from the common quality assurance principles of peer review and enhancement shared across Europe, and towards risk-based metricised accountability. Its immediate relevance lies in examining how quality assurance professionals (QPs), who are responsible for the enactment of policy institutionally, are responding to this sea-change in regulation and what it means for the quality assurance of teaching and learning in England, as set out in the research questions.

1.2 Research questions

The study aims to establish what effect this major change in higher education policy will have on the future of the quality assurance of teaching and learning from the unique perspective of those responsible for interpreting policy and enacting institutional change. In doing so, it seeks to understand the benefits and disbenefits of changes to quality assurance practices and whether these can be reconciled into a system which meets both international standards and is fit for purpose in an increasingly marketised knowledge economy.

The research questions are:

1. How do quality assurance professionals understand the quality assurance role within the changing higher education context?
2. How have quality assurance professionals interpreted and enacted the regulatory changes under HERA pertaining to quality assurance?

3. What are the implications of the changes for the quality assurance of teaching and learning?

RQ1 is intended to ascertain QPs' attitudes, beliefs and values in relation to their quality assurance role and developments in higher education; RQ2 explores the nature and extent of QPs' responses to the HERA in changing institutional quality assurance practices; and RQ3 considers the wider implications of changing practices for the concept of quality and the purpose of the quality assurance of teaching and learning in higher education.

In answering the research questions, the study addresses the key debates informing this aspect of UK higher education policy and governance: the definitions of quality; the purpose of quality assurance and developments in UK external quality assurance monitoring practices; and the positioning and professionalisation of quality practitioners' roles. It examines the consequences of diversifying practices within a national system and how these differences are impinging on the identities and roles of the QPs. In drawing conclusions, it suggests how an SPT framework could be used to re-think the way change happens in higher education and argues for a quality assurance system which can meet both European standards and adapt to the market, an argument which will be of interest to quality professionals and policy-makers.

1.3 Theoretical position and methodology

This is an empirical, qualitative study which explores the relationship between higher education policy and practice. Ontologically, it takes a constructivist approach to social reality and employs social practice theory (SPT) (Reckwitz, 2002; Shove and Pantzar, 2005; Shove et al, 2012; Schatzki, 2017; Trowler et al, 2012) as its principal lens to examine how specific regulatory changes are responded to and enacted by QPs at the relatively unexamined meso level of the institution (Trowler 2005). This lens is augmented by the complementary constructivist concepts of communities of practice (Lave and Wenger, 1991) and the third space professional (Whitchurch, 2004, 2008). Methodologically, the research design uses semi-structured interviews and selected documentary

evidence to explore in-depth the lived experience of individuals (Silverman, 2017, Bryman, 2016) at the centre of significant change.

1.4 Contribution to knowledge

Prior to the changes, the UK quality assurance system was well-established and widely critiqued in relation to its impact on the quality of higher education (Harvey and Williams, 2015; Newton, 2013, Jarvis, 2014; Lucas, 2017), but remains relatively unexamined as a social practice through which the concept of quality is constructed and reconstructed within HEIs. By investigating how and to what extent practices are changing, and the roles of those making the changes, the study contributes to a detailed understanding of how quality is being conceptualised within HEIs and the consequences of radical change for the quality assurance of teaching and learning. In presenting the under-represented voice of the QP (Tight, 2012) at the centre of the process, the study provides new knowledge and an original and authentic perspective on developments in higher education quality assurance. It also delivers new insights into research on the process and the mechanisms of policy reception and enactment at the meso level of the HEI. These mechanisms are offered as the basis of a schema for enacting future change in higher education quality assurance.

1.5 Personal interest and motivation

At the time of the HERA's introduction, I was working as Assistant Director at QAA, which I left in 2018. Before that, I occupied both academic and quality roles in an institution delivering higher education and have subsequently worked as a consultant to private higher education providers. I have thereby maintained a keen personal interest in quality policy developments. Although no longer an 'insider' (Trowler, 2016a), I have experience of both the regulator and the regulated, and previous professional relationships with some of the participant QPs. The implications of my former roles on the research design and process are discussed in the Methodology chapter.

1.6 Thesis structure

The thesis is arranged into six further chapters. Chapter 2 introduces the regulatory bodies and quality mechanisms which form the policy context. Chapter 3 reviews the literature on higher education policy and governance, the development of quality assurance systems and the professionalisation of university administration. The fourth chapter explains the ontological position and the use of SPT and related concepts which form the theoretical framework. Chapter 5 sets out the methodology, comprising the research design and methods of data collection and analysis. Chapter 6 combines the analysis and discussion of the findings, which are organised thematically, and the final chapter presents the conclusions in relation to each of the research questions, the contribution to knowledge, limitations, and recommendations for further study.

Chapter 2 The policy context

This chapter situates the study within its historical and social context by providing a description of the relevant policy and regulatory changes, and the areas of contestation which have persisted around them. It also serves to introduce the principal regulatory systems, bodies, social actors and artefacts whose interactions create the cultural context for quality assurance and give rise to change.

2.1 The European quality assurance context: ENQA, EQAR and the ESG

In 1999, the Bologna Process was begun to ensure comparability between the standards and quality of higher education across Europe. This major undertaking led to the establishment of the European Association for Quality Assurance in Higher Education (ENQA) in 2000; the development of the *Standards and guidelines for quality assurance in the European Higher Education Area* (ESG) in 2005; and the development of the European Quality Assurance Register (EQAR) in 2008. To become a member of ENQA, quality assurance agencies must be listed on EQAR and are subject to review against the ESG by ENQA to gain and retain their membership. Membership of ENQA has reached 55 and extends beyond Europe (ENQA, 2023) with many countries adapting their quality assurance systems in line with the ESG and allowing for the international operation of EQAR-listed agencies.

The relevance of ENQA to this study is that 'this rather successful network' (Beerkens, 2015) contributes to the culture of quality and establishes the parameters for quality assurance through the ESG. The ESG offers guidelines, rather than rules, which is consistent with the autonomy it explicitly advocates for both agencies and HEIs (ENQA, 2015, p22). The ESG states that agencies should be independent and act autonomously (ENQA, 2015, Standard 3.3), having full responsibility for their operations and the outcomes of those operations without third party influence (ENQA, 2015, p26). Membership of ENQA also confers some strength in numbers to set against national

governments (Beerkens, 2015) and gives legitimacy to its members, of which QAA is one, through its own cyclical peer review process.

The principle of peer review is enshrined in the ESG, which states that 'At the core of external quality assurance is the wide range of expertise provided by peer experts…including those of institutions, academics, students and employers/professional practitioners' (ENQA, 2015, 2.4). The ESG therefore situates peers as intrinsic to higher education review and 'peer experts' clearly includes students. The ESG also states that: 'At the heart of all quality assurance activities are the twin purposes of accountability and enhancement. Taken together, these create trust in the higher education institution's performance' (ENQA, 2015, p7).

2.2 The UK regulatory bodies: from QAA to the OfS

Established in 1997, at the recommendation of the *Dearing Report* (Dearing, 1997), QAA's primary role as the independent quality body was to develop the Framework for Higher Education Qualifications (FHEQ) and make definitive judgements on whether HEIs met the requirements of the UK Quality Code, the key guidance document on academic standards and quality, through a system of cyclical peer review.

In 2018, the HERA established the OfS, a non-departmental public body, 'to fulfil a role as the main regulator of higher education in England' (DfE, 2018) denoting a significant shift in responsibilities from QAA to the OfS (OfS, 2018, p20). QAA's remit as the Designated Quality Body (DQB) was thereafter reduced to submitting its judgements, based on a revised Quality Code, to the OfS in order 'to inform its assessment of whether a provider continues to satisfy the relevant conditions of registration and its assessment of the risk that a provider may breach a condition of registration in the future' (QAA 2019a, p14). From March 2023, QAA demitted its responsibility for quality assurance in England to the OfS because, critically, 'the requirements made of the DQB by the current regulatory approach in England are not consistent with standard international practice for quality bodies, as reflected in the ESG' (QAA, 2023a), signalling a major shift in the regulation of higher education in England. The

deviations from the ESG are manifest in the revisions to the UK Quality Code and in variants to QAA's review methodology.

2.3 The UK Quality Code and QAA review methodology

The UK Quality Code 2013-17 (QAA, 2017) was a substantial document, incorporating the purposes and principles of the ESG. Devised for UK HEIs by higher education sector representatives under the guardianship of QAA, it set out 'expectations' for academic standards, quality, information and enhancement, underpinned by 'indicators' of how each expectation could be met. The revised Quality Code (QAA, 2018a) claims to be 'fit for purpose in an evolving regulatory landscape, and accessible to the full diversity of the sector and its wider stakeholders' (QAA, 2018a, p1). The revisions include the reduction of the Quality Code to one A4 sheet, divided into two columns, headed by an Expectation for Standards and one for Quality. Each is subdivided into a list of Core and Common practices. Core practices 'must be demonstrated by all UK higher education providers as part of assuring their standards and quality'. Common practices, however:

> focus on enhancement. They are mandatory requirements for all providers in Scotland, Wales and Northern Ireland. In England, providers may wish to work towards these, but are not required to do so as they are not regulatory requirements and will not be assessed as part of the OfS's regulatory framework. (QAA, 2019b).

The role of students in enhancement has also been relaxed. Although the Quality Code 2018 states that student engagement in 'the quality of their educational experience' is a Core practice, engagement in the 'development, assurance and enhancement of the quality of their educational experience', is a Common practice (QAA, 2018a, p3) and therefore not mandatory. In practice, this means that HEIs are required to ask students about their experience, but not to involve them in 'representational structures' (QAA 2017, p33) as expected under the 2013-17 Quality Code. Under the pared-down and more flexible Quality Code 2018, the enhancement of the student experience and

student involvement in the process has become optional for providers in England. These changes are fundamental to a system which has held the principles of enhancement and student engagement at its centre for the previous two decades. In addition to being applied differently from the three other jurisdictions of the UK, these changes to the criteria in England constitute a highly significant deviation from the ESG.

The QAA review methodology, as set out in the method handbooks, encompasses the purposes, participants and frequency of review. The method in the UK has evolved over time from its first incarnation as Subject Review in 1998, with its scrutiny of specific disciplines, to Institutional Audit in 2002, which shifted the focus of quality assurance to the management of standards and quality, where it remained under the pre-2018 versions of the Quality Code. There was sufficient flexibility under the Quality Code to allow for variations between the review methodologies operating in the four countries of the UK, such as the foregrounding of enhancement in the long-standing Scottish method, *Enhancement-led Institutional Review* (ELIR) (QAA Scotland, 2017), but the focus remained on the twin purposes of accountability and enhancement, monitored and supported through the process of cyclical peer review.

The revised quality assurance review methodology under the OfS in England places increased reliance on the use of metrics to assess provider performance and risk. It therefore moves away from cyclical review to a frequency determined by the annual submission of specified data. The methodology also replaces 'peer reviewers' (QAA, 2017) with 'experts' (QAA, 2019a); and removes students from review teams (ibid). Students became part of external quality assurance review teams in Scotland in 2003 (QAA, 2018b) and in England, Wales and Northern Ireland in 2009. As reported in the *Outcomes from Institutional Audit 2009-11*, the introduction of student reviewers was one of several initiatives reflecting 'QAA's increasing concern for student engagement' (QAA, 2012, p20). In writing about the diminishing engagement of students in the Australian quality assurance system, Shah et al remark that 'In the UK, the use of students in external reviews is extraordinary…a student is

part of the review team across the UK' (2014, p10). The abandonment of peer and student involvement in the review methodology under the Quality Code 2018 further distances the practice of quality assurance in England from the rest of the UK and Europe.

With its development and deployment of the 2013-17 Quality Code and associated review methodologies, QAA was 'the first agency to be judged fully compliant with the Standards and Guidelines for Quality Assurance in the European Higher Education Area' in 2013 (QAA, 2016a). The UK agency has consequently enjoyed considerable standing in Europe and internationally, as one of the 'leading quality assurance agencies' (ENQA, 2018, p67). Ironically, under the HERA changes it became the first ENQA member to omit the fundamental purpose of enhancement and the principles of peer review and student engagement from its new review methodology for England, *Quality and Standards Review* (QAA, 2019a). Following its consequent suspension from EQAR in 2022, QAA relinquished its role as the DQB for England, to re-gain registration and maintain its 'extensive global advisory and review commitments' (QAA, 2023b). As noted by Kernohan (2022):

> QAA…needs EQAR registration more than it needs the DQB role. Though income is associated with the latter, it sees the work it does in Wales, Scotland, Northern Ireland and internationally as being more important to the future of the organisation.

The future of the organisation and, by association, the 'UK higher education's world-leading reputation for quality' (QAA, 2019b) is therefore being reconstructed. On a more localised scale, the loss of QAA and the introduction of a new regulatory system sets a complex challenge for the QPs charged with the responsibility for quality assurance within English HEIs.

2.4 The Quality Professional

For the purposes of this study, QPs are defined as those responsible for quality policy, which includes individuals typically designated as Directors of Quality or Quality Managers. It is a complex identity and role, developed over time. The

different organisational configurations and the status accorded to quality personnel within HEIs is pertinent in addressing internal power relations and the capacity for policy enactment. In smaller HEIs, such as private providers, the quality assurance function may be combined with another role (London Film Academy, 2023, p10). Prior to the HERA, most QPs were also QAA peer reviewers, affording both an external and internal institutional perspective on quality assurance. As the review methods changed, so did the involvement of the QP in review. From acting as 'review secretaries' for Institutional Audit, QPs became full members of review teams with the introduction of the *Higher Education Review* (HER) method in 2012, thus granting equal status with academic reviewers.

It is the role of the QP to respond to the changing requirements of external monitoring, reflected in the Quality Code and method handbooks. The cyclical peer review process took six months and involved the reviewers and the HEI, through the QP, across the entire period (QAA, 2017), meaning a heavy investment of time in preparing for and responding to this process every four to five years. All internal aspects of the review were coordinated by the QP, preparing the documentation, and selecting staff and students to attend meetings in conjunction with the Lead Student Representative (LSR) as part of the internal student engagement strategy. The QP liaised with the review team throughout the process, then disseminated the good practice and interpreted the recommendations regarding how quality and standards might be improved by changing practices where necessary. The QP role is therefore pivotal in interpreting and enacting policy, and in mediating the process of external quality review to the institution. How they have responded to the key elements of cyclical peer review and how they are adapting to the power shift in regulation, the revised Quality Code and the change to a more risk-based outcomes review methodology merits investigation for the effect the changes have on their roles and professional identities..

2.5 Summary

This chapter introduces the quality professionals, the key regulatory bodies (QAA, the OfS and ENQA) and the principal instruments of regulation (the Quality Code and the ESG). It highlights the key issues in UK higher education quality assurance: the autonomy of HEIs; the balance of accountability and enhancement; the value of cyclical peer review; and the involvement of students. These issues and their implications for the concept of quality; the relationship between quality assurance and teaching and learning, and between QPs and academics; and the cohesion of the sector, inscribe the landscape within which QPs have been operating, with the intention of revealing the unprecedented scale and significance of the HERA changes.

Chapter 3 Literature review

The subject of quality assurance in higher education generates substantial research interest. 7% of articles published in 2010 in selected higher education journals (excluding *Quality in Higher Education*) concerned the 'quality industry', twice as many as on 'teaching and learning' (Tight, 2012, p104). Since the 1980's, quality assurance in higher education has grown dramatically (Harvey and Williams, 2015) and academic research has been conducted from the early 1990's, which is when quality became a key concern as a result of the massification, internationalism and marketisation of the sector (Harvey and Williams, 2010).

One conclusion Tight draws from the research into quality in higher education, which extends across course evaluations; grading and outcomes; national monitoring practices; league tables and system standards, is that the quality assurance systems in place are not working as intended (2012, p108). How quality assurance systems are intended to work, and for whom, underpins this study and is explored through three interrelated strands: the development of higher education policy and governance in the UK; the development of quality assurance systems; and the professionalisation of university administration and the emergence of third space professionals.

3.1 The development of higher education policy and governance in the UK

There is extensive literature on the development of UK higher education policy and governance since the expansion advocated by Robbins (1963) and the changes to funding recommended by Dearing (1997) took increasing hold under the neoliberal political hegemony emergent from the 1970's. These changes provide the context for the development of quality assurance policy within the sector and prompt consideration of how the policy process works to bring about change and what makes this process more or less effective.

3.1.1 Policy and governance

The policy reforms to UK higher education relevant to this thesis began in the 1980s and 1990s within a political climate dominated by neoliberalism and are well documented (Williams, 2004; Graham, 2015). The consequences for governance of opening up higher education to the principles of a free-market economy, deregulation and reduced public spending are extensively analysed (Dill and Soo, 2004; Ball, 2012; Dill, 2018) under the interrelated themes of the marketisation and massification of the sector.

Underpinning the ongoing marketisation of higher education is the assumption in the *Browne Review* (2010) and subsequently embodied in the government White Paper (BIS, 2011), that competition increases choice and drives up quality. However, markets do not function perfectly and competition may lead to cost efficiency, but not necessarily quality (Jongbloed, 2004). The expansion of private higher education providers resulting from deregulation and the lack of capacity in the public sector to meet the need in some disciplines (Knight, 2010) has provided some examples of quality education in specialist subjects, contributing to the enhancement of the higher education sector as a whole (QAA, 2016b), but Hunt et al's (2016) study of six countries concludes that:

> There is very limited evidence to suggest that the presence of the private sector…has improved the quality of provision or driven down prices in either the public or private sectors. Indeed, relative to the public sector, the quality of provision in the private sector is often found wanting, while tuition fees are usually higher. (p11)

Competition did not drive down costs, as all HEIs charged maximum fees. Similarly, the argument that student choice will penalise low quality and increase competition between universities, resulting in more responsive and higher quality teaching appears to be unfounded, particularly if seeking the learner's immediate satisfaction takes precedence over the more enduring intellectual development engendered through challenge, struggle and problem-solving (Nixon et al, 2018). Students as consumers are likely to adopt an instrumental approach to education as a paid-for commodity, rather than for its

intrinsic value (Naidoo and Williams, 2015), and academic disciplines that do not translate easily into substantial profits are vulnerable to the market (ibid). Relying on student demand to drive institutional policy does not therefore serve the longer-term interests of either students or society. However, the realisation that universities were the key drivers in the rise of the knowledge economy has changed the traditional concept of the university and produced a fundamental shift in the way HEIs are defined and justified (Olssen and Peters, 2005). Education, from being regarded as a public good, provided by non-profit-making institutions free from market pressure and with clear societal missions, is now a global enterprise delivered by quasi-businesses in a complex and competitive knowledge marketplace (Pucciarelli and Kaplan, 2016).

The neoliberal discourse of knowledge capitalism (Davidson Harden, 2010) which recasts students as consumers and higher education providers as instrumental in meeting economic imperatives has led to conditions which allow for the deployment of 'new public management' in higher education, a different means of governing or controlling what HEIs and their staff do by establishing and organising the conditions for governing the quality of their activities (O'Leary and Cui, 2020). The traditional professional culture of open intellectual enquiry and debate is under pressure from an institutional stress on performativity, as evidenced by the emergence of an emphasis on measured outputs: strategic planning, performance indicators and quality assurance measures. According to Ball (2003), the culture of performativity requires individual practitioners to organise themselves as a response to targets, indicators and evaluations, to set aside personal beliefs and commitments and live an existence of calculation, operating 'within a framework of judgement' (ibid, p31). This reductive approach to higher education policy may in part be attributable to the need for quick fixes among policymakers seeking efficiency and statistical certainty (Wrigley, 2019). The causal, common-sense assumptions which then emerge can obscure the complexity of the field, thereby disempowering its practitioners and constricting the discussion of educational values in public life (ibid). Ozga (2017) challenges the increasing reliance on data in educational policy-making and the conviction that it improves performance. Brand and Millard (2019) complain that the sector is

'bedevilled with the use of quantitative metrics to construct league tables of universities' (p43), and the *Teaching Excellence and Student Outcomes Framework, 2017* (TEF), a key measure of performance, is criticised for its failure to meet the criteria of scientific validity, comprehensibility and cost-effectiveness (Nason, 2019). The debate is further problematised by the incipient 'quantification of quality' (Kallio et al, 2017, p2), as quantity becomes a measure of quality, in for example, the number of research articles published. Concern that the normative process by which the quality of research output is now assessed numerically, rather than by its efficacy, is one which may be more widely applied to the entire quality assurance process.

An alternative view of the use of metrics within the higher education sector focuses on the potential offered by the *Data Futures* programme (Williamson, 2017), initiated in 2011 in response to the White Paper *Students at the Heart of the System* (BIS, 2011). This programme uses data surveillance to meet the requirement for supplying information to the public and inform prospective student choice through instruments such as the TEF (Gunn, 2018) and to maintain standards through reporting to the Higher Education Statistics Agency (HESA), with the OfS facility to de-register poor providers. Moreover, it envisions the use of big data to create the smart university, where a combination of technologies can be 'plugged into the architecture of the university' in ways that will impose new modes of quantification and standardisation and bring in new actors from across the public and private sectors to build smarter, market-competitive digital universities for the future (Williamson, 2018). The implications are that data-driven universities operating within a smart, globally-connected environment will not only enable policymakers to analyse sectoral data, and users to measure their progress in real-time, but will also encourage and facilitate self-monitoring and drive quality in new, more extensive and effective ways (Gunn, 2018). In the digital, global age, there is a certain reformatory appeal and progressive power about re-imagining the university as a rich and responsive blend of people, technology and programmes, transforming the spaces, temporal rhythms and social relations to align its work with the logics of the market and to continuously

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refresh and reconstitute the higher education sector (Komljenovic and Robertson, 2016).

The literature on the development of higher education policy is characterised by its responses to the neoliberal hegemony of competition, markets and big data, tending to produce a polemic within which some of the subtleties are inevitably lost. It is argued that the neoliberal narrative is flawed and ill-equipped to improve teaching and learning (O'Leary and Cui, 2020). Higher education systems may simulate businesses in that they manage money, produce products and compete, but they are not conventionally capitalist (Marginson, 2013). That academic teaching does not fit the paradigm of consumption and that academic knowledge cannot be standardised leads to the conclusion that academic life and marketisation are irreconcilable (Furedi, 2010). The underlying assumption that the student is no more than a utility-maximising, rational, economic actor confirms the reductive effects of the neoliberal discourse (Nixon et al, 2018). However, with fees replacing grants, this view co-exists alongside the understanding of higher education as a business and students as consumers with 'rights' under the Competitions and Markets Authority (CMA, 2015). Students are entitled to pre-course information about what they can expect from their programmes, in addition to regular surveys to see if their expectations are being met (Tsiligiris and Hill, 2021). Some believe that higher education, like the motor industry, can be a beneficiary of business methods such as the 'Lean' approach to production imported from Toyota and promulgated by Balzer (2020).

The strength of feeling emerges in colourful metaphor: higher education is engaged in the 'third quality war' (Kernohan, 2019), academics are experiencing a 'tyranny of numbers' (Ball, 2015), and decision makers are 'fleeing Frankenstein's monster and meeting Kafka' (Prinsloo, 2017). The connotations of conflict, oppression and dislocation are part of a discourse which could itself be construed as two-dimensional and reductionist. The assumption that key words such as 'accountability', 'effectiveness' and 'leadership' work ideologically by emphasising technical rationalism, eclipsing questions of political or moral purpose (Wrigley, 2019) is also overstated, not

least because the concept of 'effectiveness' is typically allied with improvement and antithesised with the neoliberal 'efficiency'. Equally, it is possible to argue against the assumed reductionism of big data in higher education and to engage with the potential and objectivity of algorithmic decision-making in the sector as well as its biases and threat of dehumanisation (Prinsloo, 2017). Avoiding thinking in binary terms of algorithmic decision-making as either detrimental or harmless opens up the opportunity to explore its capacity to provide technical solutions to complex social issues (ibid).

With the recent direction of policy travel in higher education accelerating towards markets and data, an increasing polarisation of opinion is not unexpected and it is important that the implications of the trend towards metrics should be questioned by the research community to promote debate and consideration of choices excluded by data dependency (Ozga, 2017), as well as being open to alternative and blended solutions.

It is also important to remember that there may be a perceived policy imperative for academics to respond in certain ways, but to what extent is it enacted? Harvey and Williams (2015) conclude that:

> While there are increasing social demands placed on higher education there remains a strong commitment to autonomy, independence and academic freedom, which quality assurance procedures sometimes rub up against. (p107)

This summation implies a complex interaction of policy drivers and resistors within the sector. How this complexity impinges on quality assurance procedures and practices first requires a closer examination of the development of quality assurance policy within the wider higher education policy landscape.

3.1.2 Quality assurance policy

A more detailed examination of the development of quality assurance policy in the UK invites a closer look at the policy-making process itself. It reveals how problems are conceptualised and approaches to change influenced by the

dominant political ideology and points to the need for a more insightful approach to understanding the policy process and the mechanisms of change.

The massification and marketisation of higher education in the 1980s and 1990s introduced some significant concerns for the quality, standard and value for money of what was on offer, which came to the forefront in policy discussion (Tight, 2012). As discussed above, the approach taken to policy development in addressing the perceived concerns is determined by the prevailing political culture and how the concerns are problematised.

If quality assurance is regarded as the product of neoliberal discourse (O'Leary and Cui, 2020) and its practices are subject to the effects of an 'audit society' which prioritises efficiency over effectiveness and equates competition with improving quality (Brown, in Watson, 2004), then it is easily reducible to a positivist quantification exercise (Prinsloo, 2017). As such, its problems can be identified and solved within a technical framework which presupposes that actors will perform rationally in response to specific conditions in a measured environment. As Trowler (2002) observes:

> the rational–purposive model is an attractive one to governments and managers alike; the notion that there are levers to pull to effect change in desired directions in order to fix clearly identified problems is undeniably appealing.

The approach to policy underpinned by this model is 'overly rational' for the purposes of higher education accountability and enhancement (Beerkens, 2015, p236). It is reductive and relies on superficial interpretations of the complex reality of quality assurance to reinforce common sense assumptions (Wrigley, 2019).

Understanding quality assurance policy development as a response to problems is an over-simplification which ignores other societal factors. Westerheijden et al's (2014) typology of quality assurance strategies show how competing arguments from different stakeholders have influenced international quality policy. The resulting matrix highlights the importance of stakeholder

relationships, setting the 'politicised' against the 'consensual' and strategic responses which are 'connected' against those which are 'decoupled'. Importantly, it recognises that governments may respond in ways that are apparently unrelated to the issues in order to achieve legitimacy with a general public which does not necessarily understand the issues, but demands some form of action. Such symbolic actions do not necessarily connect with HEIs and are apt to undermine autonomy (Westerheijden et al, 2014). The introduction of the National Student Survey (NSS) as an instrument to drive improvement through ratings has a rational-purposive appeal (Macfarlane and Tomlinson, 2017). The concept of a survey is readily understood as a form of customer feedback producing measurable outcomes. However it is symptomatic of the reductive thinking which has been widely criticised within the sector as too simplistic to improve quality (Bell and Brooks, 2017; Thiel, 2019) and has been acknowledged by the DfE (2020) to have had the reverse effect:

> Since its inception in 2005, the NSS has exerted a downwards pressure on standards… There is valid concern in the sector that good scores can be more easily achieved through dumbing down and spoon-feeding students, rather than pursing high standards (p5).

The DfE (2020) also notes that focusing on customer satisfaction has drawn attention away from core teaching, learning and research activity, adding to the administrative burden. It calls for universities to strip out unnecessary internal bureaucracy and for the OfS to review its approach to data collection as part of its development of the regulation of quality (p11).

The neoliberal, rational-purposive approach to quality policy and the instruments being used to implement it are not functioning as intended. Despite being cast and recast in various forms, quality assurance systems are still broadly regarded by stakeholders as not fit for purpose in delivering the change required, which is to improve quality (Harvey and Williams, 2015). Stakeholders have different grounds for criticising the increasing use of metrics in quality assurance: that it that it fails to recognise the complexity of the concept of quality (Nixon et al); that it has the effect of marginalising more fine-grained,

process-level markers of quality (Blanco-Ramirez and Berger, 2014); and that it is not being used in a sufficiently smart way (Williamson, 2018). The problematic for external cyclical peer review has been the criticism levelled by academics at its shortcomings as an administrative data-collection exercise focused on accountability. This reductive tendency risks rejecting the entirety of review process along with those peer elements which acknowledge the intangibles at the core of quality enhancement and which encourage self-regulation and contribute to the sought-after trust between the regulator and the HEI (Harvey and Williams, 2015) and which would ideally underpin the development of quality policy.

The perceived failure of quality assurance policy and the lack of effects directly attributable to external quality assurance systems should not be regarded solely as a design error, but as a misconception of how organisational change takes place (Stensaker, 2003). A different understanding of the policy process and how change works can engender more effective decision making. Trowler (2002) argues that the policy process is complex and that improving higher education provision through policy initiatives is socially mediated through actors exercising discretion in response to circumstances which produce different interpretations. SPT presents a convincing alternative perspective for considering how change takes place at the critical meso level through the responses taken by QPs to the former and extant quality assurance systems. It will be used to examine what changes have taken place since the HERA and which are ongoing, with particular attention to the policy shift from enhancement to accountability and how internal quality assurance may be adapting to changes in the external monitoring process.

3.2 The development of quality assurance systems

The development of quality assurance policy sets the context for how quality assurance monitoring has been systematised within higher education. Quality is the conceptual tool through which quality assurance is implemented (Harvey, 2006a). It is therefore necessary to understand how quality, as it is applied to higher education, is defined (Harvey and Williams, 2015), as the meaning

attached to quality affects how it is intended to be achieved and how it is measured (Tight, 2012).

3.2.1 Defining quality

The concept of 'quality' in higher education is contested, as evidenced by the numerous attempts to define it, many of which use Harvey and Green's (1993) five-fold descriptors as a starting point: exceptional; perfection; fitness for purpose, value for money and transformational. From the outset (p3), their seminal paper establishes that quality is a relative concept in respect of both the user and the circumstances in which it is applied. Quality as 'exceptional' automatically makes excellence exclusive and difficult to attain, which is not desirable in a mass education system. Quality as 'perfection' or 'consistency' in conforming to agreed internal specifications makes excellence more widely attainable, but principally applied to product and not amenable to external scrutiny, which is also unacceptable in a marketised system that demands comparisons in the form of league tables. When applied to higher education, the principle of quality as 'value for money' opens up contentious issues about standards and accountability, including the extent to which the value of higher education can be reducible to the economic returns it is purported to generate (Tomlinson, 2018). Quality as 'transformational' is also about adding value, but to the student, and in ways which are qualitative and focused on the enhancement of the learning experience and the empowerment of the individual learner. The idea that people may engage in higher education to develop and realise their potential as human beings, thus enabling them to contribute more fully to society, is increasingly subordinate to economic functionality (McArthur, 2011).

The most widely-used of the definitions, 'fitness for purpose' (Nicholson, 2011), is also the descriptor used by ENQA (ENQA, 2015). It has the advantage of being inclusive, in that if a product or service fulfils its function, then it meets the definition of quality. Fitness for purpose and transformational are the favoured interpretations with senior managers in higher education, but fitness for purpose and value for money are the most popular with the funding body and regulator

(Lomas, 2002). The lack of scholarly agreement surrounding the meaning of quality suggests that a concept borrowed from business and industry is ill-suited to the higher education context (Nicholson, 2011), but that customer-based definitions of quality have been legitimised by the prevailing neoliberal discourse.

The existence of competing claims from different stakeholder groups: government, the public, parents, students, quality agencies, HEI management/administration and academics, means that the practical solution is to accept the diversity of views and reject the possibility of a single definition of quality (Nicholson, 2011). Quality is therefore 'stakeholder relative', which places demands on researchers to understand what it means in each circumstance to avoid obfuscation, intentional or unintentional (Harvey and Green, 1993). As the discourse around quality continues to change in a dynamic environment, different meanings emerge, gain traction and are open to ideological manipulation. The concept of 'excellence' has been used synonymously with quality in the TEF (OfS, 2017). The TEF may be viewed as the extension of a neoliberal policy narrative which reduces quality teaching and learning to the meeting of performance targets (O'Leary and Cui, 2020) and aligns quality with product and the quantitative measurement of outputs. Such performativity is traditionally resisted by academics as an externally imposed form of managerialism, however academics, particularly in a research environment, are also capable of using the 'rhetoric of excellence' to safeguard their own positions rather than embrace new directions or enter into more collaborative arrangements which could improve quality (Moore et al, 2017).

Within this complex semantic construct, where quality is allied with many other concepts and charged with meanings which are used interchangeably (Harvey and Green, 1993) it is inevitable that the recent policy changes and how they are enacted will further shape the meaning of quality and the purpose of quality assurance for different stakeholders. Part of the stimulus for undertaking this study is a concern about how enhancement, which is allied to the transformational capacity of quality, is being excised from the quality assurance methodology in favour of more consumer-oriented interpretations.

Understanding the definitions of quality preferred by QPs will illuminate their responses to the HERA and how they are adapting their internal quality assurance systems.

3.2.2 The purpose of quality assurance

Consideration of the multiple meanings of quality is important for this study as it underpins debate about the purpose of quality assurance, which is equally contested and dependent on different stakeholder perspectives. Beerkens (2015) list of research outcomes into the purpose of quality assurance shows that it is oriented towards control, comparison and competition, in line with its industrial origins. The list does however include reference to improving quality, providing information and student mobility (ibid).

The purposes of quality assurance are many, but have ultimately coalesced around the 'classic dichotomy' (ibid, p235) of accountability for public funding and the enhancement of the student learning experience. ENQA (2015) refers to accountability and enhancement as the 'twin purposes through which trust is established' (p7). This tenet of the ESG implies that the twin purposes are compatible and, if deployed together, will inspire credibility in the regulator and confidence in the HEIs. The simplicity of this aim belies the complex reality of the concepts and their relationship. Accountability is widely perceived as a managerial 'top-down process, based on quantitative measurements', whereas enhancement is regarded as bottom-up and 'based on qualitative judgements and engagement with academics' (Williams, 2016, p3). This critical divide offers two principal outcomes: the 'ideal', where the twin purposes of accountability and enhancement form opposite ends of a continuum, with quantitative data being used to inform improvements to teaching and learning (Elassy, 2015), or they remain two separate dimensions of quality (Harvey, 1999) from philosophically opposed paradigms (Nicholson, 2011). The latter implies irreconcilable differences: accountability is broadly understood as the requirement to submit a range of performance data to the relevant regulatory bodies for comparison and approval, or an agreed form of notice to improve. Enhancement, like 'quality' is more elusive: it has more interpretations and is

more difficult to measure. Some definitions of enhancement make the relationship less distinct. Defined as 'continuous quality improvement' in higher education, it can be challenged on the basis that there is a limit to how far excellence can practically be improved upon (Collini, 2012). QAA's definition of enhancement as: 'taking deliberate steps at provider level to improve the quality of learning opportunities' (QAA, 2013) may be viewed as an attempt to integrate enhancement with accountability, thereby reducing the gap between management and academe. Into this enduring and contested mix, the most recent version of the ESG (ENQA, 2015) has added 'transparency' as a necessary condition for 'trust' in contemporary political and social life.

This fundamental dichotomy and the extent to which accountability and enhancement can, or should, be held in equilibrium has underpinned the development of quality assurance policy and systems. It is a debate which builds on the competing concepts of quality and continues to be framed in the discourse of oppositions, the 'quality wars' (Watson, 2006) fought between governments and the higher education sector within the context of political and societal change. How this division is mirrored in practice, and how transparency and trust may be achieved, is examined by next considering the relationship between external and internal quality assurance systems.

3.2.3 External and internal quality assurance systems

How concerns about higher education quality are problematised by governments and the policy strategy taken to address them has influenced the growth and positioning of higher education regulatory agencies and shaped external quality assurance systems. The form of the external system raises issues of and trust and transparency within the sector (Dill and Soo, 2004; Jongbloed et al, 2018). The system may be experienced directly by a minority, but will be mediated through the institution's internal quality assurance system for the majority, hence the relationship between the two is important.

There is much congruence internationally in external methods of quality assurance, faced with similar policy challenges of deregulation and reduced public spending (Harvey and Williams, 2010). It is arguable that many agencies

have failed to accommodate enhancement and have prioritised accountability, resulting in the dissolution of trust among the academic community (ibid). Although quality assurance has helped to put quality on the agenda and professionalise quality processes within universities, it is questionable as to whether stronger leadership, management, new units and formalised procedures have made education any better (Beerkens, 2018) and delivered a more secure foundation for trust.

The development of internal quality processes is contingent on the requirements of external quality assurance systems (Dano and Stensaker, 2007). Efforts to apply business models, with their focus on performance indicators and outcomes, to higher education quality improvement are repeatedly found to be inappropriate for the substance of higher education (Harvey, 1995; Houston, 2007; Nasim et al, 2020). Reliable performance data on student achievement is unattainable using external quality assurance methods because 'assessment is about judgement, not measurement' nor 'trying to shape recalcitrant reality into the form that PIs require' (Knight, 2002), p113). Furthermore, replacing qualitative measures with quantitative metrics takes the focus of quality not just out of the classroom, the locus of innovative practice in teaching and learning, but out of the university altogether (Kernohan, 2019). As noted by Shah and Jarzabkowski:

> The danger of compliance-driven quality is a lack of focus on enhancement and rewarding excellence in core and support areas of the university as more energy is devoted to meeting external compliance requirements rather than building internal capacity for quality assurance and ongoing improvements. (2013)

The cumulative effect of an emphasis on quantitative measures is of a 'one-way accountability which undermines trust' and threatens the autonomy of the sector from the top down (Hoecht, 2006). This 'asymmetrical relationship' (ibid) between governments and HEIs, and between management and academics, also sees the alignment of external requirements with accountability and places the responsibility for enhancement internally.

Externalising quality may have some benefits in that the market-led consumer demand for more information about higher education has the positive effect of promoting transparency (Beerkens, 2015), but this purpose is subverted if that information is only translated into league tables for superficial public consumption. In 2004, Dill and Soo referred to the need for auditing information as a form of consumer protection in the avoidance of information asymmetry and few would dispute that academics should wholeheartedly embrace accountability and transparency, but not as it has been formulated in the UK (Hoecht, 2006).

The issue is therefore not about whether quality assurance systems should exist, but in what form and for what purpose. Developing a quality assurance system which combines the purposes of enhancement and accountability with autonomy, while enabling transparency and maintaining trust is complex. The challenge for QPs is how to manage the external asymmetries produced by government policy in enacting policy with staff internally. Critical to this challenge is the positioning of the regulatory body, hence an examination of QPs' relationship with QAA and their interpretation of its quality assurance methodologies is therefore essential context for understanding their relationship with the new regulator and quality assurance system.

3.2.4 The UK quality assurance system and QAA prior to the HERA

Harvey and Williams (2015) claim that quality assurance has become 'an accepted and integral part of academic life', however, the extent to which QAA, the quality assurance system and monitoring practices are accepted or have been integrated into academic life in the UK is contestable. Assessing the conditions and relationships prior to the HERA provides the context for the changes which it precipitates and the relative levels of acceptance.

Established in response to the perceived lack of institutional autonomy in the 80s and 90s, the 'sector owned' QAA occupied a challenging position, poised between government and the increasingly diverse higher education providers engendered by neoliberal educational policy. Its role, how it set standards and its review methodologies have all been subject to extensive scrutiny from

different stakeholders. From its inception, QAA was criticised by the universities for methodologies which made excessive demands for information, popularly described by (Newton, 2000) as 'feeding the beast'. It was also accused of bias against certain providers, notably non-traditional private providers (Alderman, 2009). It was found wanting by a government Education Select Committee (2008) for being 'a toothless watchdog' and unequal to the task of upholding academic standards. With some justification, the QAA review judgement of 'limited confidence' (Alderman, 2009, p5) was cited as meaningless, as 'it is not a judgement of failure' (QAA, 2009, p6), incurring no penalty, only recommendations for improvement to be addressed with an action plan.

Such criticisms led to a growing emphasis on accountability as governments sought to improve quality through competition and reduce costs, marked by the *Browne Review* (2010) and *Students at the Heart of the System* (BIS, 2011). The policy, which encouraged diversity of provision, also needed a quality assurance system to accommodate private providers, whose rapid growth and influence on the sector has been relatively recently documented to confirm concerns about variable quality (Fielden and Middlehurst, HEPI, 2017; Hunt and Boliver, 2019). QAA's response, in the form of the risk-based HER method, delivered a 20 percent failure rate during cyclical peer review (QAA, 2016c), including two universities which did not meet the expectations of the Quality Code. In a sector which had previously found only 1% of academic programmes to be unsatisfactory (Harvey, 2001), this outcome seemingly vindicated prior accusations of 'cosiness' between QAA and the universities (Alderman, 2008).

The HER method continued a trend in the review methodology towards a more top-down approach to quality assurance, which began with the change from Subject Review to Institutional Audit in 2001. The focus of review shifted from individual disciplines to the management of quality processes, removing the need for subject specialist reviewers, demarking quality assurance as a management function and creating a disconnect with the 'life worlds' of academics (Lucas, 2017, p5). In the HER method, the definition of enhancement as 'a provider-level activity' (QAA, 2013), aligns it discursively

with management, rather than teaching and learning at the subject level. Furthermore, there is a view that through HER and the concomitant changes to standards, the responsibility for assuring quality and standards, which rightfully belongs to the HEI, is being arrogated by QAA (Raban and Cairns, 2014). This assertion arises from a particular reading of the Quality Code, which replaced the Academic Infrastructure in 2013, and has accrued different meanings within the sector.

Although the 2013-17 Quality Code does not claim to be other than 'a series of reference points' (QAA, 2019b), it is widely understood to 'set out the definitive guide to the standards that higher education providers are required to meet' (Ashwin et al, 2015). The apparent contradiction in the terms 'guide' and 'required' is a source of potential confusion. One reading of 'required' may lead to the conclusion that institutions are no longer permitted to define the fitness for purpose of their own quality assurance arrangements and that staff within institutions and QAA reviewers are no longer able to use their professional judgement in interpreting the guidance (Raban and Cairns, 2014). Alternatively, what is 'required' may be interpreted as the expected outcome, but not a prescription for how it should be achieved, as suggested by the 'indicators' which accompany the expectations of the 2013-17 Quality Code (Brand and Millard, 2019). These are not intended to be used as a checklist, although newcomers to the sector, particularly private providers, may use it in this way to build a quality assurance system resistant to the increased risk of unethical behaviour and corruption (Martin, 2016), or to successfully open, manage and close an international branch campus (Houlton, 2019). Some established providers may also take issue with more contentious expectations, such as the valorising of student engagement, which appears to mandate specific types of student involvement in university-owned processes (Ashwin and McVitty, 2015). The language of the 2013-17 Quality Code merits close examination because it is the key document in the quality assurance system. The inherent polysemy in the text, which is intended to encourage flexibility and innovation in meeting the standards, simultaneously leaves it, and the quality assurance system, open to interpretation and criticism.

The pattern of academics' responses to the changes introduced by the HER methodology and the 2013-17 Quality Code is complex. Although most support quality assurance processes in principle, they disagree about how those processes are best conducted (Lucas, 2017). There is criticism of the disassociation between policy and practice, referencing in particular the 'implementation gap' between the intentions underpinning quality policy and the actual outcomes (Newton, 2013); the imposition of 'quasi-market, competitive based rationalities premised on neo-liberal managerialism using a policy discourse that is often informed by conviction rather than evidence' (Jarvis, 2014); and 'disciplining technologies' which 'subjugate the academic workforce and deserve to be resisted' (Lucas, 2017). The language used reflects perceived tensions at the macro, meso and micro levels of policymaking and policy enactment. Developments are seen to be at the expense of sectoral and institutional autonomy, which is undermining academic engagement (Harvey and Newton, 2007). The resulting disjuncture is mirrored in internal organisational structures and administrative procedures which, if primarily designed to meet the quality standards for external scrutiny, may be seen as subverting the proper focus on teaching and learning (Brady and Bates, 2016).

The extent to which academics perceive a disconnect between internal quality assurance practices and the enhancement of teaching and learning will affect their ownership of those practices, to the point at which they may not wish to be involved (Cardoso et al, 2018). A lack of engagement is likely to influence perceptions of QAA, the Quality Code and the HER methodology. Other than those who are selected as QAA reviewers, or are chosen to meet the review team during an external review, academics will experience QAA indirectly through the practices of their internal quality assurance systems. QPs therefore have a key role in mediating the methodology, both during external review and in everyday quality practices through the internally-devised structures and procedures to create a sense of empowerment. It is advantageous to the work of QPs, who have a direct relationship with QAA, contribute to the discourse of quality and are charged with enacting institutional change, that QAA is neither seen as ineffectual or 'a monster' (Prinsloo, 2017) by academic staff. Such perceptions lead to active resistance, or the potentially more problematic

impermeability of 'compliant indifference' said to characterise the majority response to the consumer-led trajectory of quality assurance (Harvey and Williams, 2015).

QAA's public image also contributes to the level of confidence and trust the academic community has in the agency and its methodology. Although QAA and its methods have enjoyed a good reputation internationally, as attested to by the scale of its transnational review operations (Jackson, 2016), new doubts about its overall fitness for purpose domestically emerged following the inclusion of private providers into the HER method. There is evidence that bad practice (Evans, 2016) and fraud, later exposed through a media investigation (BBC, Panorama, 2017), remained undetected during private provider reviews because review teams did not contain the requisite financial and legal expertise. QAA has also been grappling publicly with quasi-legal issues such as contract cheating and the regulation of essay mills, for which it is deemed to be inadequately equipped (Medway et al, 2017). In response to these nascent issues and the requirements of HERA, QAA was compelled to 'strengthen its senior leadership team' (QAA, 2019c)

QAA was therefore experiencing problems with an increasingly free-market higher education system prior to the HERA, principally in dealing with new providers while using a methodology which has remained fundamentally unaltered for two decades and was developed with traditional public-service universities in mind. The methodology has changed significantly under HERA. It is therefore necessary to understand what was in place and what will be lost or altered, before considering what the consequences will be for the practice of quality assurance.

3.2.5 The practice of external peer review

External peer review is frequently alluded to in the literature as part of a macro analysis of a changing regulatory landscape. It is criticised for the administrative burden it places on the HEI, the financial burden on small private providers (Fielding and Middlehurst, HEPI, 2017) and, critically, its lack of fitness for the purpose of enhancing teaching and learning. However, the practice itself and

how the QPs who are directly involved in its enactment feel about it is less well analysed. Rather than discard the whole process, the component parts merit some evaluation with a view to understanding which may be considered worthy of retaining, revising or replacing.

The UK's external review process, in keeping with the European method for measuring the institution's performance, is summarised by Kajaste et al (2015) as:

> a self-assessment by the institution, followed by the assessment of the programme or institution by a team of peer experts according to a set of defined criteria, who report their assessment to the institution (p271)

The criteria have previously been discussed in relation to the Quality Code (2.3). The remaining elements are the self-assessment, the use of peers, the team meetings conducted to assess the programme, and the institutional report.

The self-assessment is regarded as one of the main benefits of external quality assurance review (Harvey, 2006b) in engaging the whole academic community. The importance of the self-assessment in enabling an institution to systematically reflect upon its progress and the potential for enhancement is made clear in the method handbook (QAA, 2017). Evidence of systematic engagement in the process of self-reflection lowers the reviewers' perception of risk and is likely to lead to a shorter review visit (ibid, p32). However, if the review method becomes more data focused at the expense of enhancement, and an increasingly risk-based approach leads to longer intervals between reviews, the view of external agencies is that this will adversely impact the HEI's approach to systematic self-assessment, because internal review would not be undertaken adequately without the prompting of external peer review (Harvey, 2006b).

The concept of peer review is an integral part of higher education research, teaching and learning, and assessment and is well-researched, but less so in relation to external quality assurance. Although its status and purpose are often

criticised for bias and unreliability (Tennant, 2018), peer review is at the core of scholarly communication and remains the dominant characteristic among academic researchers when deciding what to trust (Nicholas et al, 2015). Early-career researchers find peer review to be a useful learning experience, although the quality of the reviewer cannot be guaranteed and is sometimes called into question (Rodriguez-Bravo et al, 2017). In respect of teaching and learning, peer review in various configurations has become part of a collegial approach to staff appraisal and development (Blackmore, 2005). The use of peer assessment among students has been found to have an overall positive effect on learning (Mulder et al, 2014). Furthermore, producing feedback engages students in multiple acts of evaluative judgement, both about the work of peers and, through a reflective process, about their own work, which can reduce their need for external feedback (Nicol et al, 2014). All these features of trust, reliability, collegiality, learning and reflection, and the extent to which they can be realised, are invoked when considering the nature and use of external peer review in quality assurance.

Favourable comparisons are frequently made between the collegiality of QAA's external peer review (Association of Colleges, 2017) and the panoptic performativity (Perryman, 2006) and post-panoptic perpetual readiness for inspection (Perryman et al, 2017) engendered by the Ofsted inspection process, which some higher education providers are also exposed to because of their 16-18 provision. There are however fears that the HER methodology is moving in an unwelcome inspectorial direction, for which the perceived inflexibility of the review criteria is blamed (Raban and Cairns, 2014). On the other hand, there is also criticism that QAA's comparatively relaxed interpretation of the meaning of 'peer', one aspect of which is illustrated by the decision to include students as full and equal members of its review teams, is devaluing the process (ibid).

The inclusion of students in review teams is divisive. As Klemencic (2018) points out, it may be viewed as an unwelcome part of the continuing elevation of the student as consumer, or as the tokenistic involvement of students in the decision-making processes, or more accurately as the culmination of QAA's

drive for student engagement in quality assurance and an exemplar to be emulated. The focus on enhancement in the Scottish system generated a level of engagement with students which led to their becoming part of every external quality assurance review team (Gvaramadze, 2011). This precedent was followed by England, Wales and Northern Ireland in 2009 and compares favourably with similar, increasingly risk-based quality assurance systems with diminishing student engagement internationally (Shah et al, 2014). The inclusion of a student reviewer operating as an equal member of the review team is a powerful signal to the provider and its students of the centrality of the student experience (Gvaramadze, 2008), not least when seen to be chairing team meetings with their institutional student counterparts.

The meetings with staff and students following the submission of evidence are the focal point of the external review process. As noted by Kajaste et al (2015), the conversations which take place function on different levels:

> an important part of the site visit in all quality assurance procedures should be the discourse between the peers and the institution…not only used as a source of information for the expert team, but as a dialogic exchange between institution and peers. This should create trust between institution and experts and help institutions to accept the recommendations given. (p276)

The advantages of face-to-face-communication with its attendant paralinguistic and non-verbal features are extensively researched and well known (Argyle, 2007; Mehrabian 2017). The review team's ability to achieve a good rapport with institutional representatives will benefit both parties through reciprocal learning and enhance the reputation of the process. However, if QAA and the quality assurance process are considered irrelevant or threatening, the resulting asymmetry between the review team and institution is likely to trigger an inauthentic form of compliance (Cardoso et al, 2018). Consonant with claims about the adversarial nature of quality assurance, the review meeting has been portrayed as a courtroom drama (Harrison and Lockwood, 2001), adding an unnecessary theatrical dimension to the process of quality assurance. This impression is extended by the belief that 'passing the QAA is all about learning

the lines and practising them until competent. It is an exercise for parrots' (Green, 2017). These metaphors add to the view that external review can lead to 'performance and game playing' rather than enhancement, as practices 'grow more elaborate, make more demands, and become routinised' (Harvey, 2002, p10). If quality monitoring is conceptualised as a performance or event, with the visit at the centre, rather than as a process, there is little likelihood of the event making much long-term impact and the more the process is one of complying with external requirements, the less the lasting internal benefits will be (ibid).

The external requirements from the review are communicated in the post-visit report in the form of recommendations. The external report builds on the self-assessment and brings additional insights not contemplated by the internal reports. (Tavares et al, 2016). In accordance with the ESG (ENQA, 2015), reports are published under the HER method, so that system-wide analyses can take place. The benefits derived from the publication of the review reports include the collation of the identified good practice into the QAA Review Findings Directory (QAA, 2020) and the production of summaries (QAA, 2018c) and case studies from this repository. Additionally, review report outcomes can be analysed to draw inferences about key quality issues. A machine learning analysis of QAA review methods reveals that the Scottish method, ELIR, provides more useful information about the student experience in its reports than the English HER method, thus contributing to the debate about student engagement in higher education quality assurance; whether student experience is a reliable measure of university quality; and the merits of different quality assurance methods (Rybinski, 2022).

Resistance to the concept of external peer review includes the paradox that external agencies can constrain the creativity they are striving to engender, by institutions doing what is safe and what they think will meet the requirements, rather than experimenting and pushing the boundaries (Craft, 2018). The method itself may therefore be seen as flawed. The outcomes are unpredictable, as demonstrated by a machine learning analysis which concludes that there is no connection between the available data and the

subsequent outcome of QAA reviews (Griffiths, 2017). Some of this perceived randomness is attributed to the composition of teams as 'panels are made up of different personnel…It is the luck of the draw whether a college gets positive or negative reviewers' (Green, 2017). These flaws are however an intrinsic part of the method: the narrative style of the report is not as amenable to machine analysis and peer reviewers are fallible and differently equipped for the role, thereby focusing on different aspects of provision or interpreting evidence differently. Moreover, peer reviewers operate within the totality of a team and an overall reciprocal learning process.

A detailed analysis of the constituent parts of external review: self-assessment, peer review visit and report, reveals what may be lost under HERA. It enables the framing of questions for QPs about how they viewed the HER method; which elements of the method they would wish to retain; and how they intend to compensate for any perceived future deficiencies under HERA, by changing internal quality assurance practices.

3.3 The professionalisation of university administration and the emergence of third space professionals

The massification of higher education heralded an increase in university administration, accompanied by the professionalisation of administrative staff (Gornitzka and Larsen, 2004), which alongside the emergence of the 'third space' and the 'blended professional' (Whitchurch, 2008a), form the context for consideration of the QP role. The role of the peer reviewer is also examined because it is one that QPs have traditionally undertaken, but remains 'unprofessionalised'.

3.3.1 The professionalisation of university administration

The aspects of the professionalisation of university administration most relevant to this study are the developments in the types of administrative function, their status, interrelationships and boundaries. These changes have resulted in the reshaping of higher education institutional structures and the rebalancing of the

relationships between the academic and non-academic functions within those institutions.

The characterisation of universities as loosely-coupled systems (Weick, 1976) has undergone some modification as a consequence of the neoliberal reforms to higher education. Universities have experienced a strengthening of hierarchical governance, the centralising of strategic organisational decision making, and the formalising as well as standardising of organisational management and administration (Maassen and Stensaker, 2019). These changes have seen university hierarchies become more tightly coupled, while simultaneously precipitating the horizontal de-coupling of managerial and administrative specialisation, formalisation and standardisation from the growing need for adaptability and organisational flexibility in academic activities (ibid). The traditional concept of the university with its strong emphasis on academic freedom (Sahlin, 2012) has experienced a rise in managerialism which marks a transition from the collegial system of decision-making and professorial self-governance to a performance-oriented model with an increasingly professionalised body of administrative staff (Baltaru, 2019).

In addition to the rising status of administrative functions, the types of non-academic function have also multiplied. In the 1970s, a new set of managerial professions associated with entrepreneurial activity, student services and quality came into being, followed by research impact, new learning technologies, and equality and diversity (Baltaru, 2019). Units dedicated to internationalism, digitalisation, and marketing and branding have also been established, the latter focus on communication being both functional and presentational in delivering conformance to the notion of what a contemporary commercial organisation should look like (Elken et al, 2018). Critically, these diverse functions have become central, rather than peripheral, to the functioning of the institution (Krucken and Meier, 2020), implying a shift in power relations between the administrative and academic functions.

Prior to the massification of higher education, a university's supporting infrastructure would have been much simpler, comprising an academic

administration to advise on the legal and regulatory aspects of policy and its implementation, with expert functions such as finance, estates, and human resources attached to it (Whitchurch 2006). There would also have been a clear boundary between it and these more specialist areas, or between the specialist areas themselves, whereby the identities of professional and academic staff were clearly distinguished (Whitchurch, 2004). The increasing diversity of functions and roles which are now part of the typical university administration have brought about different ways of conceptualising those roles and their interrelationships. Whitchurch's (2008a) typology of professional identity dispositions: bounded, cross-boundary, unbounded and blended, offers an alternative approach to understanding organisational roles which goes beyond the job descriptions typically associated with a bureaucratic role culture (Handy, 1993) and fits with more contemporary understandings of universities as assemblages of different functions, actors and relations occupying different spaces (Bacevic, 2018). The concept of the blended professional is of particular interest in relation to higher education quality assurance, as it contemplates a role which could be reconstituted in operating between administration and academia in the third space (Whitchurch, 2008a).

3.3.2 The third space

Organisational theory no longer sees organisations as composed of isolated groups arranged in a hierarchical descending order and finds that horizontal interactions are usually more numerous and more important than the traditional vertical patterns associated with line management (Handy, 1993). The concept of the third space in higher education is especially useful for examining how those horizontal interactions take place and the blurring of internal boundaries. It also leads to consideration of the status of QPs, and how effective they perceive themselves to be in their roles.

Identified and developed by Whitchurch (2008a, 2008b, 2012), the third space locates individuals such as QPs between academia and professional staff, defined as administrative or management. A helpful qualification of the concept separates specialists, such as librarians and human resource managers from

generalists, such as QPs and student services (Bacon, 2009). Two further observations regarding the complexity of the QP position are pertinent: that the generalist skills associated with quality management, research administration or educational development are unlikely to transfer outside higher education, meaning that they have a specialism particular to higher education and that, in this respect, generalists are the third space professional staff (Akerman, 2020). There is a view that this third space is not adequately recognised within HEIs, which sets QPs at a disadvantage as to how they are identified and valued (ibid). More positively, Whitchurch (2008b) sees these emergent 'blended' professionals as moving laterally across functional and institutional boundaries to create new professional spaces, knowledges, relationships and legitimacies. In relation to quality assurance, due recognition of the third space offers a constructive way forward to meet the challenges of the increasing complexity of educational policies and regulations, burdens of compliance and imperatives of the quality frameworks (Veles and Carter, 2016).

How QPs perceive their position within the institution will affect how successfully they believe they can meet the challenges and enact change. Seyfried and Pohlenz's (2018) empirical study of German quality managers concludes that the concept of the third space helps to explain quality managers' perceptions of the efficacy of their own work. Quality managers will perceive themselves as more effective if they understand their role not as positioned to execute management requirements, but supported by senior management to engage in quality activities. Being supported to actively network with quality managers externally confirms their relevance, and being able to 'act in an academic environment with the help of academic means, for example the robust application of empirical research methods in educational evaluation procedures' (ibid, p18), helps to mobilise the support from academic staff. The concept of the third space reframes the problems faced by QPs as change agents charged with the deployment of externally-devised measures of quality assurance which are demonstrably unpopular with many academic staff.

Although focused on academic 'tribes and territories' and the relationship between academics and their disciplines, Becher and Trowler's (2001) seminal

work offers an insight into how QPs see themselves in relation to their work and the work of others, including academics. The development of the concept of tribes and territories recognises that what academic staff do is now more diverse and that they are presently joined by professionals of different sorts who are intimately involved in the processes and practices of universities (Trowler et al, 2012). The authors suggest that the 'tribes' metaphor has therefore outlived its usefulness and that taking the theory in a practice direction will prove more fruitful in considering the blurring of boundaries between academic and professional roles in the contemporary HEI. More fluid metaphors are recommended in a social practice approach to change which acknowledges that:

> managers are not told or forced to take their place. They take their places by 'playing' the knowledges, discursive and embodied practices upon themselves. These form an unstable 'grid' which signifies as the 'manager' or 'managing', but whose effectiveness in relation to embedded locales is constantly problematic (Prichard, 2000).

If the third space is intrinsically fluid, it will influence the formation and development of professional identity. This sense of mutability is particularly relevant to QPs who find themselves in the third space invested with enacting policy change within what may be regarded as more embedded academic environments. It invites more detailed consideration of how the QP role gains its identity and the factors which govern its positioning within the HEI.

3.3.3 The quality assurance professional's role

Although administrative functions have become more central to higher education and quality assurance forms part of the administration of all HEIs, the role of the QP in UK higher education remains relatively unexplored in the literature (Tight, 2012). One approach to understanding the role and how it is shaped and perceived within the higher education context is to examine the extent to which it conforms to the process of professionalisation.

The professionalisation of administrative roles may be characterised by an increase in the formal status of the position; an increase in the requirements for formal education qualifications; the emergence of a common cognitive basis; and the growth and formalisation of networks between personnel in those administrative positions (Gornitzka and Larsen, 2004). Professional staff may be defined as individuals who have management roles but not an academic contract. This definition includes general managers in faculties and functional areas such as student services; specialist professionals with accredited qualifications, such as those in finance and human resources offices; and 'niche' specialists who have developed functions such as research management and quality audit (Whitchurch, 2008b). The characteristics of status, qualifications, cognitive base, networks and niche position may therefore be used to contextualise the QP role and understand how it gains its particular identity.

When defined as blended professionals within a third space, QPs may be seen to occupy an unusual position within HEIs. They are required to enact policy and practices directly related to the core business of teaching and learning, but often through horizontal relationships with other managers and with academic staff. It is therefore pertinent to ask where that niche space is and if there is any consistency between institutions. Studies of the internal make-up of universities reveal that they are structurally diverse, each with its own distinct identity (Tight, 2012). Although the criteria used to establish increasing diversity: size, control, range of disciplines, type of degree and modes of study, do not include changes to administrative functions (Huisman et al, 2007), each variable impinges on the nature of the third space.

Added to this inherent structural diversity, and as an ongoing consequence of marketisation, universities continue to modify their missions and functions, and therefore their internal organisational structures (Boffo and Moscati, 2011). Repeated restructuring adds to the instability of the institutional workspace with consequences for staff working patterns and responsibilities (Tight, 2012) which may lead to a loss of professional identity and feelings of powerlessness (Mills et al, 2005). Job titles and how they change within a restructuring are an

important signifier of institutional priorities and intent, and of individual identity and status (Grant et al, 2013). Job titles do not exist in a vacuum; they are made meaningful in relation to other job titles, the individuals who hold those job titles and a shared understanding of what the job titles mean. The relational aspects of job titles are intrinsic to the development of working identities and how job titles are used by individuals to organise and make sense of their working environment, and to determine where they fit and who they are (Melling, 2018). Nomenclature and its connotations are significant, to the extent where some administrative titles within HEIs are not deemed useful as signifiers of identity, owing to their being outside of 'what universities are for' (Martin and Ibbotson, 2019). Titles such as 'Director' or 'Manager' attached to the QP role self-evidently denote levels of responsibility and, if associated with another function, such as 'Teaching and Learning' or 'Policy', indicate organisational priorities and imply a supporting unit or team. In smaller HEIs, such as private providers, the quality assurance function may comprise a single member of staff, or it may be combined with another role, for example teaching (London Film Academy, 2023, p10).

This kind of role combination offers a potentially illuminating insight into whether such arrangements can be deliberately designed to blur boundaries and smooth internal transactions, or are forced by expediency and lack of staffing options. In the latter case there is the risk of downgrading quality assurance to a supporting role, or confusing its identity. Such confusion can lead to role ambiguity and role conflict, which are not only significant work stressors, but may also be construed as a disregard for the individual member of staff or the role being undertaken (Bowling et al, 2015). In a larger institution, the need for vertical code switching as an individual alternates between behavioural patterns that are directed toward higher and lower status colleagues can also contribute to role conflict (Anichich and Hirsch, 2017), a stressor which may be amplified in the case of third space QPs by horizontal relationships with multiple academic departments and boundary spanning roles (Naidoo, 2018). Such cases serve as a reminder of the inextricable link between role and context in public spaces (Goffman, 1959). Exploring the characteristics of niche and status shows that the third space occupied by QPs is often unstable. If

interpreted as flexibility, it presents opportunities for individuals to create new relationships and adapt, but roles within that space may also be more susceptible to internal pressures and constraints.

Two further and related characteristics of professionalisation relevant to the role of the QP are formal qualifications and a common cognitive base. Research into the background, experience and qualifications of QPs in higher education is however scarce and this appears to be typical of QPs in other areas. The uptake of undergraduate degrees and postgraduate qualifications in Quality Management and modules in Quality Assurance among practising QPs is unknown. As a comparator, empirical research within the field of Engineering reveals that nearly 37% of quality management practitioners have never undertaken a quality management course at university level and more than 40% of quality engineers and managers who participated in the study had less than a week's training in quality management (Jiju and Sony, 2021). Attempts have been made to devise a competencies framework for QPs (Martin et al, 2021), signalling a perceived need for standardisation from some critics, but assumptions can only be made about the level of demand in higher education. The conclusion to be drawn is that there is no prerequisite qualification and that QPs will be bringing different backgrounds, experience and qualifications to the role, whose general skills requirements will be broadly commensurate with other administrative appointments at the same level of the institution. Depending on their previous experience, QPs may therefore rely on in-situ learning and networking with other QPs to develop their cognitive base, which is in part dependent on the interpretation of changing regulations.

Networking is the final characteristic against which to consider the QP role. It is likely that third space QPs will share norms, beliefs and values that are somewhat specific to their unit (Mills et al, 2005) and - assuming the QP is not working alone - the team will develop into one of the many subcultures within the institution. However, in developing their cognitive base, QPs may also find their networks elsewhere and their reference points are likely to be external. As with most professional occupations, there are recognised support networks, for example the Quality Strategy Network (QSN) offers a forum for the discussion

of key issues of quality management and enhancement, and organises an annual conference and smaller symposium events to discuss specific areas of interest (QSN, 2020). Many QPs will be trained QAA reviewers; some may have been reviewers for many years and will have experienced the transition from acting as 'review secretaries' for Institutional Audit, to becoming full members of review teams with the introduction of the subsequent method, HER, in 2012. They may therefore have some shared background and experience and may develop other networks based on personal acquaintance and having co-ownership of the community they create, facilitated by social media (Nussbaum-Beach and Hall, 2012). Most importantly, all QPs are working to the same criteria, as set out in the Quality Code and QAA review method handbooks. They are automatically invited to become members of QAA, which grants access to quality-themed seminars and conferences and an extensive range of support materials. Hence they may be seen to form a 'community of practice' (Lave and Wenger, 1991) sharing the same task, domain, repertoire and discourse (Farnsworth et al, 2016), but one which is predominantly virtual rather than co-located (Dube et al, 2005).

Conceptualising QPs as a community of practice is useful in exploring the extent to which QPs share attitudes, values and meanings, and the perception of 'boundaries' (Wenger, 1998) within the sector and between other communities within HEIs. These perceptions will affect the way in which QPs position themselves within the quality community (Fanghanel, 2007). How close they are to the centre or the periphery of the community will be determined by factors such as background and experience. Their position is likely to be an indicator of their receptiveness to the HERA, their relationship with other administrative functions and academic staff, and their approach to interpreting policy and enacting quality assurance practices internally

The characteristics of professionalisation in conjunction with the concept of the third space aid understanding of the role of the QP in higher education and its pressures. Although the status of quality has been elevated with the rise of managerialism in higher education, QPs evidently occupy a niche position for which there is no standard qualification and a cognitive base which is subject to

change as a result of external policy reform. It is therefore a role subject to identifiable stressors, which need to be met with a resilient mindset. According to Duckworth (2016), the essence of this mindset and the foundation of success is 'grit', a combination of passion and perseverance, which is channelled into a willingness to design, a drive or desire to synthesize diverse forms of knowledge and develop collaborative, cross-boundary solutions to complex problems (Grove, 2018). As all these activities are readily identifiable with the QP role, being informed by a range of backgrounds, experience and knowledge can be seen as an advantage in a fluid environment and may also contribute to the building of networks and a community of practice, which form the mechanisms necessary to support the development of personal resilience (Naidu, 2021).

Membership of different communities both provides support and complexifies a role, leading to potential conflicts and tensions. What an individual does outside their main work role extends into other areas (Becher and Trowler, 2001) and may inhibit or enhance the enactment of those roles. It is therefore appropriate to examine the role of the peer reviewer as it is one which many QP undertake and which provides a contrasting perspective on the quality assurance process.

3.3.4 The peer reviewer role

The literature on the role of the peer reviewer has been included for three reasons: under ENQA, peers are axiomatic to the review process; the notion of what constitutes a 'peer' is changing, contested and criticised; and QPs also typically have been, or still are, external peer reviewers. Some consideration of research into the peer reviewer role is therefore relevant to how QPs interpret and enact policy internally and how they perceive their roles as professionals.

That reviewers are 'peers' and not burdened with the authoritarian connotations of 'inspector' or 'examiner' is important to the autonomy of the sector. There are however issues regarding the term 'peer'. QAA reviewer recruitment specifies 'senior staff' (QAA, 2017, p48), which is apt to be exclusive, although the meaning of 'senior' has been widened in the increasingly diverse higher education sector (Green, 2017), where one third of the 115 private providers

registered for QAA review have fewer than 100 students (Fielden and Middlehurst, HEPI, 2017). 'Senior' staff in private providers may therefore have considerably less experience than their counterparts in the universities. For some critics, recruitment from these institutions, some of which may be failing (Green 2017), amounts to a deliberate downgrading of the criteria against which reviewers are appointed (Raban and Cairns, 2014), leading to asymmetries within the review teams. Conversely, extending reviewer recruitment to include a more diverse and representative range of institutions may be regarded as part of the overall learning process, meaning that failing institutions are learning from reviewing successful ones and observing good practices in quality assurance.

The peer reviewer role has attracted criticism for two main reasons: lack of professionalisation and limited dissemination of learning. In identifying the competencies required by peer experts, Damien et al (2015) assert that 'only carefully trained staff as well as peers can carry out such activities successfully' (p266). Peer reviewers require certain skills and knowledge and the importance of the reliable and valid exercise of peer judgement is acknowledged in the reviewer training programme provided by QAA and explained in the method handbooks (QAA, 2017). However, the standards to which peer experts operate are not explicitly stated or accredited, which feeds the 'permanent debate' (Damien et al, 2015, p266) about professionalising quality assurance in higher education. For some critics, the absence of agreed standards undermines the process of evaluation in higher education. There are calls for a set of professional competencies for all evaluators (Galport and Azzam, 2017); for reviewers to demonstrate fitness for purpose (Cheung, 2015); and for practitioners to transform themselves into a profession (Harris-Huemmert, 2008). Conversely, it can be argued that that professionalisation undermines the status of reviewers as professionals in their own fields (Harvey and Newton (2007). By creating a hierarchy, professionalisation has the potential to erode the sought-after trust between reviewers and institutions and threaten the essential peer-ness of the process. Furthermore, professionalisation would increase the disparity between reviewers and student reviewers who, although

they undergo the same reviewer training, are unlikely to have a similar baseline experience from which to become 'professionalised'.

Harvey (2002) asserts that the only benefit from peer review is the experience gained by the reviewers, but that there is little evidence to show that this experience is shared with colleagues or reflected in the experience of the reviewed (p260). Although he recognises the value of the reviewer training and the openness of the process, Harvey undervalues the opportunities for peer-to-peer learning (Kajaste et al, 2015). He may also underestimate the tacit sharing through training and teamwork, and the more explicit dissemination of good practice through QAA reviewer conferences.

The benefit of the peer reviewer role is a less well-developed area of research into external peer review. It is however tenable that training adds a professional dimension and increases the QPs' capacity to interpret and enact policy at a high level of functionality, based on:

> knowledge of the community's epistemology, of the genres through which the community interacts, and of the conventions that regulate these interactions. (Wingate, 2016)

If the peer reviewer role is permanently excised from the external quality assurance process, it will deprive the QP community of a significant resource of shared knowledge and experience.

3.4 Summary

In 2001, Becher and Trowler argued that the exercise of peer review judgement 'must be tolerated, for all its admitted faults, because no one, and certainly not QAA, has yet come up with an approach to academic evaluation that would not be discernibly worse' (2001, p90). The 20 intervening years of increasing marketisation have been characterised by an ongoing debate about the relative autonomy of the sector, the remit of the regulator, the meaning of quality and the appropriateness of the quality assurance system in balancing enhancement and accountability. Each interrelated element forms the context within which

QPs have developed their third space roles and their community of practice, and from which they enter into a new risk-based, data-orientated regulatory regime, which has moved away from the key principles of the ESG.

Chapter 4 Theoretical framework

In acknowledging that theory provides a discourse to describe the world and to explain it (Trowler, 2012), this chapter sets out the principal theories used in the study. It explains why SPT was selected as the principal lens to explore policy change and why complementary theories of policy implementation and enactment were chosen to develop the thesis, by comparing with other potential approaches where relevant. It also describes how the theoretical perspectives chosen have been adapted to the research topic and the research questions.

4.1 Ontological and epistemological position

The research questions are designed to explore attitudes to the changes in the higher education review methodology in England among QPs and to consider their perceptions of the implications of these changes for the quality assurance of higher education teaching and learning within an evolving regulatory landscape. In choosing the theories to work with, the aim was to ensure that the theoretical approach aligned with my ontological stance, was fit for its intended purpose and achieved epistemological consistency, conceptually and methodologically (Ashwin, 2009). To gain an 'in-depth, holistic understanding' of the 'lived experience' (Punch, 2005, p238) of QPs, a qualitative approach was taken to the research, which seeks to 'understand phenomena in their context-specific setting' (Grey, 2017, p162). I have therefore positioned myself within a constructivist, interpretivist paradigm, influenced by a broadly phenomenological tradition, which 'seeks to understand the world from the participants' point of view' (ibid, p165). Developing a broad theoretical position provides a framework for the research which can then be focused through the lens of complementary theories operating at the appropriate level. Ideally, these will also act as a sensitising framework (Sibeon, 2007) to stimulate new ways of thinking about the research questions, which is pertinent, given my prior professional involvement in quality assurance.

4.2 Social Practice Theory

SPT belongs to a broad category of cultural theory which emphasises the significance of symbolic structures of meaning in the social world, both their construction and enactment by people (Trowler et al, 2012). This study draws principally on SPT as developed by Reckwitz (2002), Shove and Pantzar (2005), Shove et al, (2012), Schatzki (2017) and Trowler et al (2012). As defined by Reckwitz a social practice is:

> a form of routinised behaviour which consists of several elements, interconnected to one another: forms of bodily activities, forms of mental activities, 'things' and their use, a background knowledge in the form of understanding, know-how, states of emotion and motivational knowledge (2002, p251)

SPT describes human behaviour as composed of many interdependent elements and individuals as carriers of those practices (Shove and Pantzar, 2005, Shove et al, 2012). Individuals engage in bundles of practices in different spaces, which are connected to others in larger and more complex formations (Schatzki, 2017). People make use of artefacts and artefacts configure the social world in an ongoing process of contextualisation and recontextualization in which individual identities are both shaped and shape the social reality (Trowler, 2012). That personal histories have a significant influence on social life in the present (ibid) brings with it the notion of temporality and the future dimension of practice, which is a product of interacting, changing and metamorphosing complexes of practices (Blue and Spurling, 2017).

Understanding the social world in this way has implications for the key and related concepts of knowledge and the distribution of power. Knowledge is situated in practices and is distributed among the people who have access to the different knowledge resources, and the things that make up the practice (Trowler, 2012). Similarly, power is not regarded as a separate or distinct property of the social, but ubiquitous and the effects of the ordering of innumerable moments of practice (Watson, 2017). Both knowledge and power are decentred from the individual, but the individual is active in whether knowledge and power are used to constrain or generate new configurations of

practices, either by adhering to routinised ways of behaviour, or making alternative use of the artefacts available to generate different meanings (Trowler, 2012). Social interaction and the development of meaning, ways of seeing and ways of doing are key drivers for social order and social change, and context generation is the important background for understanding change and trajectories of change (Trowler, 2012). Accepting this understanding means that the focus for the analysis of change is best located in the practices, not the individuals involved (ibid).

SPT has been criticised for its limiting association with the analysis of the everyday, such as showering (Hand et al, 2005), central heating (Morley, 2017) and has been defended against accusations that it cannot deal with the big things or the individual (Shove et al, 2017). Studies show how it can be applied to areas as diverse as rapid increases in per capita energy demand (Shove, 2017) and changes to the rules of international football (Schmidt, 2017). The latter example connects the individual player to the governance of the game through the interactions of the team on the field of play. SPT therefore offers a nexus of practice from which to consider the social phenomenon of higher education regulation from the meso level of small group interaction. It also offers the advantage of being applicable to people operating singly (Saunders et al, 2015), as may be the case with QPs in some smaller private HEIs.

4.3 Theories of policy implementation and enactment

My research is prompted by the introduction of a government policy and my interest lies in how the policy is translated into practice through the interactions of actors, both within and outside their respective HEIs. It is therefore appropriate to consider theoretical perspectives on policy implementation and enactment. In discussing policy, the term 'enact' is preferred in this study as it aligns with a social practice approach to change. However, where sources or participants use 'implement', the more conventional terminology is retained. In arriving at the preferred terminology, alternative theories were considered to enable a more complete understanding of how policy becomes practice.

In connecting policy to practice, the 'policy implementation staircase' (Reynolds and Saunders, 1987) provides a useful heuristic for how the position of groups and individual actors within the higher education system shapes their responses to policy. It offers an explanation for the gaps which appear between the aims of government and the outcomes at institutional level. The staircase illustrates the dual role of policy actors in both receiving and relaying policy and what happens in between. The position of policy actors within the hierarchy and their positioning in relation to the policy text will, through the associated process of gatekeeping (Shoemaker and Riccio, 2016), determine which aspects of the policy will be withheld and which will be communicated, and how. The situatedness of the individual's relationship to policy is therefore critical (Saunders et al 2015). However, what the vertical staircase analogy is not able to convey as effectively, but is also part of the situated experience of policy, is the horizontal dimension. This dimension is of critical importance in relation to professional roles in the third space, as such roles may be caught in a culture clash between practices associated with managerialism and collegiality when attempting to introduce change (ibid).

The notion that practices are 'struggled over' in the local settings of each higher education provider (Ball, 1994; Braun et al, 2010) leads to preferred understanding of the concept of policy enactment over policy implementation, where enactment refers to an understanding that policies are interpreted and translated by diverse policy actors within the specific educational environment, rather than simply implemented. The concept of the policy object and enacted ontology (Sin, 2014) extends this idea further, distinguishing between what the policy actors believe the policy object is and what it becomes when it is transposed into practice, thus making the connection to SPT by recognising that 'policy enactment, ultimately manifest in actions and practices, is conditioned by socially-constructed knowledge, that is, by context-specific ontologies' (ibid, p1). Attention to the policy object offers a different lens for policy analysis, inviting fine-grained attention to a specific policy object by means of actor conceptions and practices (Sin, 2014). Taking the specific HERA changes as the policy object and QPs as the policy actors charged with

the enactment of policy, this approach complements the use of SPT as a research tool at the meso level of the institution.

An examination of theories of policy implementation and enactment shows that policy might seek to engender certain effects, but the extent to which it does can rarely be attributed solely to the policy itself. Policies undergo forms of mutation, translation and re-assembly as they travel between different policy contexts (McCann and Ward, 2013). To bring about change, policy must be adapted to local contexts in a way that remains cognisant of the multiple components and context-specific factors that need to be considered and strategically arranged to render the policy workable (Savage, 2020).

The policy process is therefore complex, paradoxical, hands-on (Peck and Theodore, 2015) and essentially 'messy', in contrast with the clean and logical model of it portrayed in the rational-purposive approach (Trowler, 2002). SPT exposes the danger of the rational-purposive understanding of change, which assumes that people on the ground will respond in logical way, which does not stand up to scrutiny in university contexts (Saunders et al, 2015). As a theory of structuration which seeks to find a balance between structure and agency (Balke et al, 2015), SPT is concerned with how people respond to a concept, rather than focusing on the external organisation which is implementing it (Trowler et al, 2012). It emphasises and foregrounds the differentiated practices of recipients or 'policy actors', who are active adapters, modifiers and interpreters of policy as it is implemented (Saunders et al, 2015).

4.4 Culture and change

The analysis of policy change traditionally involves consideration of the cultural context in which the change takes place. Culture is a complicated concept (Williams, 1976) and open to a multiplicity of meanings. In relation to organisational change, culture is generally accepted to mean the shared norms, values and assumptions of a collective (Silver, 2003). Within this study, culture is understood in relation to social practice; all individuals adapt to, reproduce, revise or challenge cultural assumptions, values and meanings (Alvesson, 2013). Organisational cultures are therefore best understood not as unitary

wholes, or as stable subcultures, but as multiple cultural configurations permeable to cultural influences from outside, but usually mixing and changing them as they interact with local culture (Trowler, 1998). These mixtures of cultural manifestations at different levels should not be otherized, or seen as a causal force, but a way of understanding the social dynamic of the organisation and its 'cultural traffic', a kinetic metaphor for how cultural patterns change with the flow of meanings and values in and around the organisation (Alvesson, 2013).

Conceptualising culture in relation to social practice rather than an overarching set of values and beliefs (Alvesson, 2013) releases the concept from the constraints of organisational theory and locates it in 'specific events, situations, actions and processes' (ibid, p204). However, it should be acknowledged that the marketisation of higher education has legitimised the transference of organisational theory and cultural analysis to HEIs (Silver, 2003) and this has implications for policy enactment. To effect change, the change agent needs to understand the existing norms, values and beliefs of the institution (Hamm et al, 2016). The participants in this study may understand their institutions in accordance with alternative and more static interpretations of organisational culture (Trowler, 1998), or how their institution positions itself within the sector.

The sector itself announces its diversity in different ways. Universities UK may be 'the voice of UK universities' (UUK, 2019), but each university seeks representation through a self-designated mission group, based on origins, ethos and ambition (Guardian, 2013) and further differentiates itself with individual mission statements. The increasing number of private providers of higher education have no overarching representation and their diversity makes it difficult to describe them as a coherent sector (Fielden and Middlehurst, HEPI, 2017). Of the 220 private providers on QAA's 2016 review schedule (QAA, 2016b), fewer than 60 belonged to two separate bodies (Fielden, 2010), one of which comprised seven private HEIs whose stated aim was to 'distinguish themselves from ''dodgy'' for-profit colleges' by creating a 'Russell group' of alternative providers (THE, 2015). For-profit private providers of higher education operating within a competitive market and offering shorter

courses at reduced costs (University of Buckingham, 2018) are more likely to espouse the 'entrepreneurial mindset' (Pucciarelli and Kaplan, 2016) required to meet the challenges of the HERA's drive for competition. In public universities, the neoliberal 'managerialist revolution' (Baltaru, 2019, p1) contributes to the internal divisions between the management functions implementing the policies and the academics finding themselves in a variety of rapidly changing and often discouraging or hostile environments generated by national policies (Silver, 2003).

Efforts to classify HEIs to understand how they function and respond to change have taken many forms. Criteria-based differentiation includes student profile, research involvement, international orientation and regional engagement (van Vught et al, 2010). Typologies based on cultural characteristics have been developed into collegial, managerial and development archetypes to explore the change process (Kezar and Eckel, 2002), concluding that there appears to be a relationship between culture and change, and that where strategies for change violate cultural norms, change is not likely to occur (ibid, p455-6). Regarding the perceived failure of external quality measures, it is suggested that a more dynamic view of organisational change, highlighting the responsibility of institutional leadership as 'translators of meaning', would contribute to a more useful process (Stensaker, 2003). Leadership and communication may be seen as key mechanisms in binding the structural/managerial and cultural/psychological elements of the institution into a specific kind of culture (Bendermacher et al, 2017). As leaders are central 'drivers' of quality culture development through their ability to influence resource allocation, clarify roles and responsibilities, create partnerships and optimise people and process management, institutions striving for a development culture should best operate from a contingency approach, making use of quality management interventions which are tailored to the organisational context (ibid).

This approach accepts a separation between management and academics, but recognises the importance of adapting change strategies to the institutional context. However, when change is conceptualised as separate from culture,

rather than interconnected and interdependent, it can result in management attempts to impose fashionable trends in organisational theory on the routinised behavioural patterns in universities with limited impact (Alvesson, 2013). How these various understandings of culture are formed and how they might constrain or encourage change therefore have different explanations and outcomes, which may influence the discourse of QPs and their responses to changes in quality assurance policy and practices.

From the social practice perspective, organisations such as universities are configured from multiple practice-arrangement bundles (Schatzki, 2017). Bundles of practices will include quality assurance practices, interconnected with other bundles of professional practices and academic disciplines, each with different discourses, identities, histories and trajectories, distributed knowledge, power relations and cultures. QPs are carriers of quality assurance practices, the meanings, materials and competences (Shove and Pantzar, 2005) which recursively generate and regenerate context and engender change.

4.5 Communities of practice

SPT acknowledges Lave and Wenger's 'communities of practice' (1991) as a theoretical antecedent (Trowler, 2005). As previously discussed (3.3.3), QPs may be seen to constitute a community of practice, albeit with a strong external dimension. Although dispersed across every HEI in the UK, there is mutual engagement in a task and a shared repertoire and discourse (Wenger, 1998). The generic task is 'supporting the development of a quality culture that is embraced by all: from the students and academic staff to the institutional leadership and management' (ESG, 2015, p7). For QPs in the UK, this aim is based on the shared repertoire of the Quality Code, review method handbooks, and a discourse developed through QP networking and enacted through institutional practices which impact the experience of academic staff and students. Social practices may be viewed as 'constructed and embedded through discourses' (Lomer, 2017), which is not intended to prioritise discourse as an element of social practice (Trowler, 2012), but to acknowledge that some

emphasis on discourse is warranted where culture can be identified through metaphor (Alvesson 2013) and analysis of policy and related documentation is required. As Lomer (2017) observes:

> Policy extends beyond the formal document and includes the actions and justifications made around the text and embedded in the meaning systems with particular assumptions, values and signs producing 'truth' and 'knowledge'. (p26)

In considering meaning systems, Trowler (2005) observes that 'Higher education regulatory agencies such as QAA and its procedures carry meaning for HE professionals over and above the information they have about such agencies' (p19). This 'tacit knowing' (ibid, p18) or 'know-how' (Alkemeyer and Buschman, 2017) is particularly relevant to the examination of quality assurance practices which are based largely on the subjective interpretation of a written code of practice, supported by shared guidance materials (QAA, 2018a). QPs will be involved in very specific activities, including informal and formal interactions with other staff; meetings; formal notetaking; systematic recourse to the guidance materials; use of standardised documentation; and prescribed verbal and non-verbal behaviours in respect of external review. As such, there is evidence of the 'interconnectedness of bodily routines, of behaviour, mental routines of understanding and knowing and the use of objects' (Reckwitz, 2002, p258), and that in their 'routinised ways of understanding and knowing how' (ibid), QPs will have their own cultural norms, developed in response to local circumstances.

The concept of communities of practice says little about power relations within a group (Trowler, 2005) and the term implies consensus and cooperation, which broadly describes the pre-HERA position of QPs. It does however encourage consideration of what happens at the boundaries of practices (Wenger, in Farnsworth et al, 2016), how practice bundles connect with others and the extent to which this happens (Blue and Spurling, 2017). Within their own HEIs, QPs may be seen as 'cultural traffic wardens' (Alvesson, 2013), charged with introducing change and negotiating the spaces between academics and other

functions such as Finance and Human Resources. In using this metaphor, Alvesson alludes to the notion of the 'third space' (Whitchurch, 2008a) and implies an institutional context characterised by tensions and resistance to the imposition of regulations, a resistance attributable to the embeddedness and tenacity of culture (Trowler, 2005). This tension is often depicted as a struggle between the systemic macro level and the micro level of the individual, overlooking the meso level (ibid). Trowler's development of SPT focuses explicitly on the missing meso level of small task-based groups within higher education. Hence it is appropriate for the study of QPs charged with enacting externally-generated national policy within institutions comprising multiple cultural configurations of individuals.

4.6 Trowler's typology of academics' responses to change

In pursuing the social practice approach to policy change, how individuals position themselves in relation to an ideologically complex text (Fanghanel, 2007, 2008) is relevant. 'Positioning' is therefore a useful concept, particularly when informed by the axial typology of 'swimming', 'sinking', 'coping', and 'policy reconstruction' (Trowler, 1998), four broad categories of response to change distilled from empirical research data with academics.

As illustrated, the categories are developed from two pairs of opposing attitudes towards change: 'content' and 'discontent'; and 'acceptance' versus 'change' or 'work around'.

	Accept status quo	**Work around or change policy**
Content	Swimming	Policy reconstruction
Discontent	Sinking	Using coping strategies

Fig 4.1 Academics' responses to change (Trowler, 1998)

Each category points to a range of potential implementation strategies, with identifiable behaviours. For those who are discontented with the change

'sinking' is characterised by a fatalistic acceptance and desire to opt out; others will develop 'coping strategies' which allow them to remain in post, but disengage from selected activities. For those who are content with the change, 'swimming' offers the chance to seize new opportunities. The most complex response is 'policy reconstruction', where individuals reinterpret and reconstruct policy on the ground, using strategies to effectively change the policy, sometimes resisting change, sometimes altering its direction (ibid). These categories, again expressed as metaphors, add to the conceptual framework and provide a basis for data collection and analysis.

4.7 Microcultures

Martensson et al's (2014) empirical study using the concept of successful microcultures provides an apt elaboration of the social practice approach to change. The study highlights the importance of tradition in the relationship between the formal organisation implementing change and its microcultures, groups of people working together in a specific endeavour. Practice becomes embedded in social relations while members engage in meaning-making that over time result in traditions. Microcultures will respond to the formal organisation and policy change through their traditions. Although adhering to 'the way we do things round here' (Trowler, 1998) implies stasis or resistance, in a microculture where, critically, development and change are part of the tradition, practice is not petrified but open to improvement. Furthermore, in analysing change, the history or saga (Clark, 2017) of the institution, as perceived by its members, becomes the frame through which change is viewed. Resistance will occur when the formal organisation seeks to effect policy change by envisioning the future and failing to recognise that the microculture will respond according to its history. Hence, quality assurance polices will not be treated with the respect intended by senior managers unless they resonate with the tradition, or saga, as practitioners understand it (Martensson et al, 2014). This extension of SPT offers further insight into the interconnectedness of culture and change and how QPs may understand their role in effecting policy change as part of an institutional microculture.

4.8 Summary

As the primary theoretical approach, SPT provides a governing principle for the study and maintains a consistent focus on practice as axiomatic to social change. It also allows for the integration of other constructivist theories which can be applied at different stages of the research process and address different aspects of the research questions. Communities of practice and the third space are used to explore the identities and roles of QPs; theories of policy implementation and enactment, and successful microcultures to understand the interactions of policy, people and practices at the meso level of the institution. This theoretical position therefore comprises interrelated strands, while remaining ontologically coherent in providing lens through which to examine how QPs are responding to policy change and its implications for the quality assurance of higher education teaching and learning. Furthermore, this approach affords the opportunity to develop the theoretical components, both in their application to the subject and in relation to each other.

Chapter 5 Methodology

In this chapter I describe the research methodology, taken to mean the framework within which the research is conducted and the methods chosen to address the research questions. I am taking a 'traditional approach' (Trowler, 2016b) to structuring the chapter, beginning with an overview of the research design and how it addresses the research questions, followed by my rationale for the research methodology, a detailed account of the research design, and a description and explanation of the data collection and data analysis methods used. Qualitative research also requires an explanation of the theoretical assumptions underpinning the methodology, the contingent nature of the data chosen and the non-random character of the cases studied (Silverman, 2017). Each section therefore includes a discussion of associated theoretical issues, including the validity, reliability, generalisability and ethical questions associated with the methodology and the selected research methods.

The chapter is written with an element of 'natural history', a first-person account which explains the course of my decision making (Silverman 2017, p475). This approach was chosen to reflect a research subject and a research process which entail responding and adapting to change, based on an ontological standpoint which recognises that the research process captures social reality at a specific point in time.

5.1 Overview and research questions

I am researching within the area of the quality assurance of higher education teaching and learning, which has recently undergone significant regulatory change under the HERA, 2017. My focus is on how QPs are interpreting and enacting the regulatory changes and how this is influencing quality assurance practice in English HEIs. My approach is constructivist and I am using SPT as my theoretical framework and an appropriate lens through which to examine quality assurance practices at the meso level of the institution.

The study is designed to ask QPs from purposively selected HEIs how they are responding to the regulatory changes and the consequences for the quality

assurance of teaching and learning within their institutions. Semi-structured interviews were conducted with the participant sample, followed by an analysis of selected documents generated by the QPs in enacting the changes. The data were analysed thematically with a primary focus on practice, within an interpretive framework enhanced by Trowler's (1998) typology of academics' response to change and a sensitising context (Sibeon, 2007) of discourse analysis.

The research questions addressed by the interviews and documentary analysis are:

1. How do quality assurance professionals understand the quality assurance role within the changing higher education context?
2. How have quality assurance professionals interpreted and enacted the regulatory changes under HERA pertaining to quality assurance?
3. What are the implications of the changes for the quality assurance of teaching and learning?

The research questions are designed to be intelligible; researchable; related to established theory and research; related to each other; manageable in scope; and capable of making an original contribution to the topic (Bryman, 2016, p83). They are formulated as 'what' and 'how' rather than 'why' questions, which is indicative of the qualitative rather than quantitative nature of the enquiry.

5.1.1 Rationale

This is a qualitative, empirical study. The decision to adopt a qualitative rather than quantitative methodology is based on my own view of social reality and the aims of the study. I am working within a constructivist ontology and interpretivist epistemology, but recognise the uses and merits of quantitative methods and the limitations of the qualitative which the researcher must take into consideration.

It is not intended in this section to rehearse well-known and 'worn out' (Robson and McCartan, 2017) arguments about the relative merits of quantitative and

qualitative research methodologies, but to acknowledge that they represent the two broad categories of research traditions, based on contested understandings of the social world. Different epistemic positions are therefore taken to respond to different questions in different ways. Qualitative methodologies seek to understand how social phenomena arise in the interactions of their participants (Silverman, 2017) addressing the 'how' and 'what' questions arising from those interactions. The focus is on the lived experience of individuals and qualitative, interpretive methods were therefore identified as the most appropriate, as these typically help to understand the perceptions, feelings and values influencing behaviour; understand the language and imagery individuals use to conceptualise their experience; understand decision-making processes; study complex issues in depth; reflect on ways to improve individual's experience; and develop hypotheses for future research (Silverman, 2017, Bryman, 2016).

Qualitative approaches, including constructivism, also emphasise the importance of the contextual understanding of those behaviours (Bryman, 2016). This study understands social reality as an ongoing accomplishment of social actors, rather than something external to them (Bryman, 2016). However, it does not push constructivism to a postmodern extreme in denying the existence of any objective reality and admits to the pre-existence of the objects of study (Bryman, 2016) and the persistence of culture (Becker, 1982), in this case the quality assurance practices within HEIs.

5.1.2 Validity and reliability

Criticism of qualitative methodology tends to be based on its inability to deliver the traditional expectations of the more established quantitative approaches: measurement; causality; generalisability and replication (Bryman, 2016), all of which generate fundamental questions about the validity and reliability of qualitative research outcomes. Validity and reliability are therefore two elements which need to be addressed in relation to the quality of qualitative research. Validity refers to the credibility of the researcher's interpretations, both internally and externally (Silverman, 2017). Internally, there must be congruence between the researcher's observations and the theoretical

concepts developed (Bryman, 2016). Externally, the extent to which an account can accurately represent the social phenomenon it is describing is problematic for a constructivist approach which does not prioritise measurement (ibid). Reliability refers to the degree of consistency with which instances are assigned to the same category by different observers, or by the same observer on different occasions (Silverman, p400). As constructivism does not view social situations as replicable, but in a state of flux, internal and external reliability cannot be applied in the more positivist sense.

From a positivist perspective, the aim of research is to be able to extrapolate statistically to wider populations. Constructivism does not assume that there is a whole story to be told (Silverman, 2017) about any phenomenon; one data set can adequately describe a 'hyphenated phenomenon' (ibid, p543), such as QPs enacting quality assurance practices, and how it becomes meaningful in a particular context. In qualitative research, the findings are generalisable to theory rather than populations (Bryman, 2017) and in a small-scale qualitative study, the theories generated may be regarded as substantive, pertaining only to the phenomenon being studied (Urquhart, 2013). It may be possible to make limited and tentative generalisations to a larger group, sharing recognisable characteristics (Bryman, 2016). However, qualitative research is most effective when used to deepen understanding of the theory and use insights gained to improve the conditions for future research.

An alternative approach to evaluating qualitative research is not to apply quantitative measurements, but to develop a different interpretation of the criteria. Qualitative research may be evaluated according to its trustworthiness, based on four quality criteria: credibility, transferability, dependability and confirmability (Bryman, 2016). I have adopted these criteria in the following ways: credibility was aided by member validation; transferability by providing detailed description of the cultural context; dependability by maintaining an audit trail of the research process; and confirmability by being able to demonstrate that I have been conscious of my own part in producing the research outcomes (Bryman, 2016). Each of these approaches is evidenced in subsequent sections of this chapter which elaborate on the research design.

Additionally, the quality of research can be demonstrated by constant comparison of the data (Silverman 2017), seeking out further cases to test provisional hypotheses and exploring, rather than discarding, deviant cases to strengthen the validity of the research (ibid), an approach which has been incorporated into my sampling strategy. The underpinning of validity and reliability as applied to qualitative research is therefore to show that the research process has been thorough and careful (Robson and McCartan, 2016). I have comprehensively documented my data collection and analysis processes, demonstrating how my interpretation was reached, while bearing in mind that there will be an interpretation based on the methodological framework chosen (Mason, 2017).

5.2 Research design

My research design involves both participant interviews and the analysis of documents generated by QPs as part of the internal policy enactment process. I am therefore using two sets of data, the first generated by the participants during the interviews and the second by analysing selected documents. This section explains how the participant sample was chosen, followed by an explanation of the research methods. Issues relating to insider research and ethics are also considered for their bearing on the robustness of the research design.

5.2.1 Participant sample

My approach to sampling was purposive, as I had specific research goals in mind (Bryman, 2016). Obtaining the participant sample required a twofold strategy, firstly selecting the institutions and then identifying the individuals for interview.

There are 420 higher education providers registered with the OfS in England (OfS, 2021). This number comprises 105 universities and 115 private providers, the remainder being further and higher education colleges, which are not part of this study, as its focus is on higher education only providers.

To select the universities, I used 'generic purposive sampling' (Bryman, 2016, p412) based on four inclusion criteria to generate the 'sample universe' (Robinson, 2014) and achieve the required heterogeneity: mission group, geographical region, subject specialism and size. There are six self-designated mission groups within the UK: Russell Group (Russell Group, 2021), 1994 Group (THE, 2013), MillionPlus (MillionPlus, 2021), University Alliance (University Alliance, 2021), Guild HE (Guild HE, 2021) and the Cathedrals Group (Cathedrals Group, 2021). Mission groups are only one way of categorising HEIs, but it is how the sector broadly describes itself and QPs would be familiar with the research and vocational orientation of each category and the core attributes of environment, experiences, status, heritage, global positioning and modernity signified (Furey et al, 2014). The categories are not fixed, as demonstrated by the dissolution of the 1994 group in 2013 following the transfer of four universities into the Russell Group (ibid). The 1994 category was however retained, as it is indicative of a different type of research-intensive university. Seven universities do not belong to a specific mission group and the 'non-affiliated' were also sampled as a seventh group. Geographical region is significant, as evidenced by the formation of sub-groups such as the N8 Research Partnership (N8 Research Partnership, 2022), representing the research-intensive universities in northern England. I also sought a balance of disciplines where this was relevant, for example in specialist HEIs delivering the arts, sciences, or medicine. The criterion of institutional size was automatically covered by its correlation with mission group, University Alliance comprising the larger, and Guild HE and the Cathedrals Group the smaller HEIs.

The same inclusion criteria were used but differently applied to sampling the private higher education providers which formed the eighth group. Although there are 115 private providers on the OfS register, their enrolment numbers represent just over 2% of the 1.86 million higher education students in England (Hunt and Boliver, 2019). The sample size therefore needed to be proportionate to the other groups, while meeting the inclusion criteria. A system of institutional representation comparable to mission groups does not exist in the private sector (Fielden and Middlehurst, 2017). Although Fielden (2010) recommended the establishment of a representative body to promote the interests of private

providers, this has only partially happened. Fewer than 60 institutions, or approximately 50% belong to two representative groups (THE, 2015): the Independent Universities Group (IUG), the self-styled 'Russell Group' of eight institutions with degree awarding powers or university title, and Independent Higher Education (IHE), the national representative body for independent providers of higher education (IHE, 2021). As 50% of private providers are based in the south-east and 37% in London (Hunt and Boliver, 2019), there is a very different regional distribution. The range of subjects is wide, but with a high degree of specialisation, 64% of providers offering programmes in only one major subject area (BIS, 2013, p30). The main subjects delivered are Business-related (30%), Religion (9%) and Creative Arts (9%) (BIS, 2013, p30), therefore providing three viable options. Regarding size, almost 50% of providers enrol fewer than 100 students and less than 1% more than 5000 (BIS, 2013). Sampling from smaller providers presented the opportunity to extend the inclusion criteria to individuals who shared the QP role with another function.

For the interviews, I required a participant sample who were conversant with the UK higher education quality assurance system and could provide an informed response and opinions about the regulatory changes. QPs were the obvious choice and I needed to identify those with ultimate responsibility for the enactment of quality policy, given that they may occupy different levels of seniority and have other functional responsibilities within the institutions sampled. In most cases, I was aware of the internal structure and whom to approach, but if not, a telephone call or email sufficed to identify the most appropriate individual.

Several QPs were contacted within each of the eight groups, making a total of 45, from which 23 responded. I then applied the other inclusion criteria of region, specialism and size (based on student numbers), within each group and across the whole sample. I continued the interviews until theoretical saturation (Strauss and Corbin,1998) had been reached and no new or relevant data was emerging, which was at 15 for the universities and 5 for the private providers. I had three further interviews arranged, however one respondent withdrew owing to a change of role and institution. Two further respondents cancelled on more

than one occasion, which I understood to be a consequence of pressure of work. I therefore contacted them to release them from any perceived obligation and because I needed to adhere to a reasonable timeframe. The total number of participants was therefore 20. The number of institutions in each group, their size and geographical region are set out in Table 5.1.

Mission Group	Russell Group (1)	1994 (2)	Million Plus (3)	University Alliance (4)	Guild HE (5)	Cathedrals Group (6)	Non-affiliated (7)	Private Providers (8)	Total
Number	24	11	19	19	10	15	7	115 (18 DAPs)	220
Sample size	4	2	2	2	2	2	1	5 (2 DAPs)	20
Student numbers	100-10k	11k-20k	21k-30k	31k+					
Number	145	45	20	10					220
Sample size	9	4	6	1					20
Region	North West	North East & Yorkshire	East	East & West Midlands	South West	South East	London		
Number	18	19	12	22	22	72	55		220
Sample size	3	2	1	4	3	3	4		20

Table 5.1 Interview sample by Mission Group, student numbers and geographical region

Notes (refer to numbers in brackets)
(1) Includes 4 former 1994 universities
(2) Dissolved in 2013 after 4 joined the Russell Group. Formerly 19 members

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Although I did not base my inclusion criteria on the personal characteristics of quality professionals and there is no data available on this group comparable to that of academics in higher education, information about their gender, years of experience in higher education quality assurance, the positioning of their roles within the institutional structure and career backgrounds did emerge during the interviews and is captured in Table 5.2.

Partici-pant	Gender (Female/ Male)	Years' experience in HE QA	Location of role (ref 6.1.1.1)	Career background (ref 6.1.1.2)
1.	F	25	Registry	University administration
2.	M	14	Registry	University support services
3.	F	14	Quality & Policy	Administration
4.	F	13	Quality & Policy	HE policy
5.	F	12	Registry	Law
6.	M	7	Academic Quality	HE teaching
7.	M	18	Academic Policy & Quality	HE teaching
8.	M	20	Academic Quality	HE teaching
9.	F	19	Registry	HE teaching
10.	F	10	Academic Governance & Policy	University administration
11.	F	19	Quality	HE teaching
12.	M	5	Registry	Engineering
13.	F	20	Quality	University administration
14.	F	3	Registry	University administration
15.	F	28	Academic Quality	University administration
16.	M	14	Academic Quality	HE teaching
17.	F	18	Registry	Law
18.	M	15	Academic Services & Quality	HE policy
19.	F	11	Registry & Quality	HE teaching
20.	F	21	Registry	Engineering
Total: 20	13 F (65%) 7 M (35%)	306		

Table 5.2 Participant data by gender, higher education quality assurance experience, location of role and career background

The table shows a higher proportion of female QPs at 65%, and experience of higher education quality assurance ranging from three to twenty-eight years. The nature of QPs' roles is discussed in section 6.1.1.1 and their career backgrounds in 6.1.1.2.

5.2.2 Research methods

The interview is 'a powerful tool for eliciting rich data on people's views, attitudes and the meanings that underpin their lives and behaviours' (Grey, 2017, p213). I chose the semi-structured interview as the first stage of my research method, as 'the objective is to explore the subjective meanings that respondents ascribe to concepts or events' (Grey, 2017, p381) and which achieves both answers to specific questions and allows for the exploration of ideas (Bryman, 2016). I had specific questions to ask, but because my participants were familiar with the topic, I also wanted some flexibility and for the emphasis to be on how the interviewee framed and understood issues and events (Bryman, 2016). Social practice-based research into policy lends itself to document research because documents are the 'sedimentation of social practice' (May, 2001, p176) and most policies are enshrined in documents, in addition to which other documents are generated, including those involving its implementation (Tight, 2019). I wanted a document recommended by QPs which they felt provided an example of the approach taken to enacting the changes and which most accurately reflected the institution's response. The number of documents was limited to one per participant, as this information was supplementary to the interview transcripts. The interviews focused on the feelings and attitudes articulated by the participants in response to enacting changes to quality assurance practices. The documents selected by the participants were intended to provide a complementary focus on how attitudes were formalised into the public-facing written text. These data sets are complementary in that the interview questions are focused on behaviour and changes to quality assurance practices, and the documents were produced by the participants in response to regulatory change, hence they are part of a 'practice bundle' (Schatzki, 2017).

5.2.3 Ethical issues

Ensuring the robustness of the research design entailed due attention to ethical issues. I was not anticipating any overtly sensitive situations, as I was not dealing with people in 'vulnerable circumstances' (BERA, 2018, p15). However, the ongoing implementation of the HERA was and remains potentially unsettling for both the regulatory bodies and the HEIs adjusting to the new regulatory system. Some participants may have therefore felt negativity or loss (Bridges, 1986) regarding HERA-related issues, or reluctant to discuss what they regarded as difficult internal situations resulting from policy or personnel changes (Kubler-Ross, 1969) and I needed to be prepared for emotional responses (Hallowell et al, 2005). Additionally, the implementation of the HERA was at a relatively early stage and the regulatory bodies were in a state of transition. Angry or frustrated individuals may have sought to exert 'roadblocks' (Bridges, 2004) or displayed some form of organisational 'gatekeeping' (Lewin, 1947) as the structural and cultural 'refreezing' (ibid) continued and this may have had repercussions for their relationship with QPs.

My approach therefore required sensitivity to the participants' circumstances in following the University's ethics procedures: gaining consent; providing a written explanation of the process; guaranteeing anonymity and the right to withdraw; interviewing with empathy; and providing interview transcripts for verification, with the option of further clarification (Robson and McCartan, 2017). In contacting QPs, I made it clear that I was no longer an employee of QAA, but was working independently and was not subject to any direct organisational influence.

5.2.4 Insider research and reflexivity

I am not an 'insider' (Trowler, 2016a) in that I am no longer employed by QAA. However, my previous role within the UK quality assurance system affected the research methodology in that I needed to acknowledge the issues relating to researching one's own organisation (Grey, 2017), both in relation to the participants and the subject.

I developed and managed previous quality assurance review methods and, as a legacy of my former role, I have professional relationships and personal friendships with some of the intended participants. Awareness of 'social desirability bias' (Bryman, 2016, p217) is therefore pertinent to a study which involves interviewing former colleagues. Equally, the researcher's own experiences and insight can help to 'gain trust and achieve rapport' (Berger, 2015, p5), and maintain effective relationships with participants for the duration of the study.

I also have views about the regulatory changes and the direction of travel of quality assurance in England. As with all constructivist approaches, the question of subjectivity and the researcher's role arises and with it the requirement for reflexivity. Researchers are obligated to be reflexive in a constructivist approach (Charmaz, 2014) and I needed to be aware of my own role as a co-creator in the production of knowledge.

> The turning of the researcher lens back onto oneself to recognize and take responsibility for one's own situatedness within the research and the effect that it may have on the setting and people being studied, questions being asked, data being collected and its interpretation. As such, the idea of reflexivity challenges the view of knowledge production as independent of the researcher producing it and of knowledge as objective (Berger, 2013, p2)

In accepting this view, 'bracketing' (Ashworth, 1999), the suspension of presuppositions 'allowing the life-world of the participant in the research to emerge in clarity' (ibid, p708), becomes problematic. The most appropriate response was to let my experience and knowledge inform the study, in devising appropriate interview questions and being able to follow them up incisively, therefore allowing 'greater access to implicit meanings' (Trowler, 2016a, p6), while recognising that this privileged insight can normalise some aspects of social life. Trowler advocates 'sensible and practical measures to ensure robustness in the approach' (ibid, p7). I used 'member checking' interview transcripts (Robson and McCartan, 2017, p172) to minimise researcher bias.

Self-checking also recognises the participants' contribution and has the advantage of requiring little additional work on the part of the researcher. A more resource-intensive technique involves another subject-familiar researcher in the analysis of data (Akerlind, 2005). A scaled-down version of this using a research-literate 'outsider' to read a sample of transcripts against pre-formed categories was adopted. A further and important aid to reflexivity and internal validity was the use of memos (Bryman, 2016), through which I was able to consistently reflect on my knowledge claims (Visweswaran, 1994) and which formed the basis for discussion with my supervisor.

The concept of reflexivity is complex and needs to be applied discriminately. It should neither lead to excessively narcissistic texts, with 'too much concern for language' (Denzin and Norman, 1997, p226), nor should the focus be on 'procedures which draw attention away from the role of language' (Alvesson and Skoldberg, 2018, p3). The acceptance of reflexivity as a problematic process (Bleakley, 1999) and one which should engage the researcher in working towards the 'uncomfortable rather than the familiar' (Pillow, 2003, p192), invites the researcher to 'challenge the representations we come to while…acknowledging the political need to represent and find meaning' (ibid).

In assessing the strength of the research design, adaptive use can be made of suggested criteria for evaluating qualitative research (Silverman, 2017), as it is the design which ultimately delivers the findings. Mine enabled me to maintain a consistent theoretical position, using complementary qualitative research methods. It accommodated challenge through the participant sample and addressed issues of validity and reliability by incorporating respondent validation into the research process. It took ethical issues into account by following approved protocols. Finally, it enabled me to find meaning by ensuring that the process was clearly documented to allow ongoing comparisons of the data and the capacity to reflect on outcomes.

5.3 Data collection

My data collection process is set out in four stages: interview planning, interview questions and interview conduct, followed by my approach to

document collection. Each stage details the intended process, how it was adapted to meet changing circumstances, and discusses the consequences of these adaptations.

5.3.1 Interview planning

The interview should meet the quality indicators of validity and reliability to the extent that these criteria can be applied to a qualitative study. Internal validity was addressed by ensuring that the question content directly concentrated on the research objectives (Grey, 2017), advice which was helpful in both formulating the specific interview questions and as a reminder of how to deliver them. Reliability was assisted by consistency of approach, including a protocol for delivering the questions and 'self instructions' (Robson and McCartan, 2016, p294) to preface the questions to the participant. Explaining the purpose of the interview and assuring confidentiality also served to address the ethical conventions regarding transparency and anonymity. As QPs have operational responsibility for the changes, they are readily identifiable to other members of the institution. Reliability also involves accuracy (Grey, 2017). Tape-recording the interviews ensured that they could be transcribed accurately and participants were invited to check their transcripts.

An investigation 'must attempt to demonstrate neutrality, showing that the researcher is aware of the possible confounding effects of their own actions and perceptions and that these, as far as possible, have been accounted for' (Grey, 2017, p221). Reconciling 'bland neutrality' (ibid, p223) with advice about 'building rapport' (ibid, p222) is, however, difficult. Interviewing former colleagues with a pre-established relationship simplifies some aspects of the process, for example selecting an appropriate register and recognising changes in behaviour, but 'impression management' (ibid, p223) is more testing when both social actors are acutely aware that an interview is not a normal conversation. Negotiating a path between rapport on a personal level and neutrality about HERA and change was challenging. Recording the interviews meant that I was able to minimise notetaking and engage more fully with participants during the conversation.

5.3.2 Interview questions

The context and literature review informed the framing of the interview questions, which are included as Appendix 1. The questions are arranged in four sections. The first section was intended to establish the participants' background and role within the institution and the second to gain an understanding of the subjective, interpersonal and affective elements of their experience, both addressing RQ1. Participants' experience of enacting policy change (RQ2) was explored in section 3, including their perceptions of the efficacy of their own practices, as it is an important part of quality assurance. Finally, participants were given the opportunity to offer their own thoughts about the changes under HERA and the consequences for the quality assurance of teaching and learning (RQ3). Section 3 included two questions informed by the four categories used in Trowler's typology of academics' responses to change (1998): 'sinking', 'coping', 'swimming' and 'policy reconstruction'. These questions were a straightforward enquiry as to how well participants felt they were managing the changes, and their 'positioning' in relation to the policy (Fanghanel, 2007). Participants were also invited to suggest their own descriptor. Supplementary prompts were included to encourage more detail where relevant. The intention was to ensure that all the questions were asked and in the same order, while acknowledging that semi-structured interviews allow interviewees to pursue issues of significance to them. Further prompts included a request for a relevant document; the option to check transcripts; and permission to seek clarification or supplementary details post-interview by email.

Interviewing is a complex skill and it was therefore important to pre-test the questions with a respondent from the group of interest (Robson and McCartan, 2016). The questions were piloted with a former colleague and member of the RG sample group. Consequently, a small number of questions were removed and the sequence re-ordered to eliminate some existing and potential repetition. Some of the remaining questions were also edited for clarity.

5.3.3 Interview conduct

Participants were approached initially through their publicly-available work email addresses, having gained permission at senior management level from QAA to approach reviewers. If requests were declined, viable alternatives available from within each of the eight categories were followed up.

Before Covid, I was intending to travel to some of the participants' institutions to conduct the interviews face-to-face, although the dispersed locations meant that some would necessarily be conducted virtually. A practical problem created by lockdown was the reduction in physical access to any participants. Virtual access was also limited by ongoing local internet connectivity issues which rendered videotelephony communication tools such as Zoom inoperable when working from home and, during post-Covid restrictions, inaccessible from other locations. Telephone was therefore the only option, combined with a laptop recorder. Conducting interviews by telephone removes the capacity to 'read' the participants' body language (Argyle, 2007) and detect important cues about their level of engagement, motivation to continue with the interview, and whether they are comfortable with the process (Grey, 2017). As SPT is concerned with uncovering participants' feelings, this limitation was problematic. It also lessened the opportunity to establish (or re-establish) rapport and develop trust (Berger, 2015). Sensitivity to paralanguage as a carrier of meaning therefore assumed greater significance (Oltman, 2016). My concerns about the lack of visual signifiers were however unfounded. I was able to take up less participant time than with face-to-face interviews and could focus more intently on what was being said without the distraction of virtual synchronicity issues. Concern about my own self-presentation proved largely unwarranted, given my prior acquaintance with the majority of participants. At the end of each interview, I summarised the main points and general tone of the conversation in a memo (Bryman, 2016; Saldana, 2016) to act as a reminder.

A total of 20 interviews were conducted. Questions were not always asked in the same order, but all the key questions were covered, with prompts where required, and any additional relevant points made by participants were noted. The interviews lasted from 39 to 83 minutes and comprised between 5,500 and 12,800 words, the total word count being approximately 175,000.

The recorded interviews were transcribed verbatim, so that comments could be included to illustrate and authenticate the findings with the lived experience (Punch, 2005) of the participants. In previous research work, I have also noted and transcribed non-verbal behaviours, but found that this has not added significantly to the post-interview analysis. Instead, I used memos to keep a note of any significant paralinguistic features (Argyle, 2007; Mehrabian, 2017), but rather than just record, I used the non-verbal cues as prompts for further contemporaneous exploration of responses. Using memos also provided documentary evidence for the research and strengthened internal validity.

Only four participants were prepared to check their transcripts, citing time pressures as the main constraint. Although few, the responses were helpful in three ways: correcting minor inaccuracies, for example with titles; confirming that a high level of accuracy could be reasonably assumed about the remaining transcripts; and the self-imposed aim of ensuring accuracy from the outset in the knowledge that texts may later be member-checked.

5.3.4 Documents

At the end of each interview, the response to a request for a document that would provide an example of a change in practice was more limited than anticipated. Not all participants were able to identify a document generated as a direct consequence of HERA, which in itself was pertinent to the findings. Some referred to the availability of documents on their institutional website, however, as I wanted the choice to be theirs rather than mine, I did not pursue the request, as it would have meant an additional unplanned demand on participants' time. Moreover, I was increasingly aware of the amount and richness of the data being generated by the interviews alone. Six documents were forwarded for analysis, with one participant providing a note reflecting on the nature of the internal change process under HERA..

5.4 Data analysis

This section provides the rationale for my data analysis methods and how they were applied to the interview transcripts and the selected documents. It

describes how my intended approach was modified as part of the iterative process inherent in the qualitative methodology.

5.4.1 Rationale

Because it lacks the universally applicable procedures of quantitative approaches (Silverman, 2017), I was conscious of the need for qualitative data analysis to be systematic and disciplined to withstand potential criticism (Berkowitz, 1997). I was also aware that it would be a heuristic process (Saldana, 2016) and one which would involve:

> Multiple rounds of revisiting the data as additional questions emerge, new questions are unearthed, and more complex formulations develop along with a deepening understanding of the material. (Berkowitz, 1997, p1)

My approach to data analysis has two strands. It is primarily thematic, using techniques developed by Saldana (2016), Miles and Huberman (1994) and Maietta et al (2018) and focuses on the practices of quality assurance enacted by QPs. This approach is strengthened by the added dimension of discourse analysis, drawing attention to the social and cultural context underpinning the enactment of practices.

Discourse analysis may be described as a multidisciplinary approach to the analysis of text, rather than a method with a wide range of meanings and applications. Where discourse analysis marries with SPT and my constructivist perspective is that language is a social practice; it is not simply a neutral device for imparting meaning (Bryman, 2016), but a means of constructing social reality and a way of accomplishing acts (Gill, 2000). The preferred approach taken to discourse analysis is contingent on how discourse is understood, which in this study aligns most closely with the discursive constructionism developed by Potter and Hepburn (2008), describing discourse in two interconnected ways:

> Discourse is constructed in the sense that it is assembled from a range of different resources with different degrees of structural organisation. Most fundamentally, these are words and grammatical structures but also broader elements such as categories, metaphor, idioms, rhetorical commonplaces and interpretative repertoires…discourse is constructive in the sense that these assemblages of words, repertoires and so on put together and stabilise versions of the world, of actions and events, of mental life and furniture. (p277)

These descriptions show that the construction of meaning in the social world takes place recursively and on multiple levels, which are the document itself, the wider policy and the ideology (Tight, 2019), thus offering a framework for analysis at the micro, meso and macro levels of interpretation. Many analytical approaches are permissible within this framework, determined by the nature of the enquiry and the research questions. At the micro level, structural semiotics (de Saussure, 1983) provide a tool for uncovering meaning in the connotations of the signs which comprise the text (Chandler, 2017). This approach urges consideration of the paradigmatic choices which structure the discourse and can be extrapolated to the meso level of production and the macro of the societal context, showing how power relations are established and embedded through language.

SPT understands power relations to be one of a number of components constructing the social world and the emphasis is on a socio-cultural understanding of how versions of the world, of society, events and inner psychological worlds are produced in discourse (Potter, 1997, 2009). Discourse analysis draws attention to power relations, which is useful within the context of an externally imposed change that is likely to be divisive. These considerations therefore formed the sensitising background (Sibeon, 2007; Trowler et al, 2012) to my analytical approach and a way of focusing on specific aspects of the text.

5.4.2 Interview transcripts

My original plan was to give structure to the analysis of the interview transcripts by adopting the four-stage - but not temporally discrete - approach outlined by

Saldana (2016): coding the text, developing categories and identifying themes before making assertions. This structure would be consolidated using a form of process coding 'appropriate for virtually all qualitative studies but particularly the search for the routines and rituals of human life' (ibid, p111). Initial coding, associated with grounded theory (Strauss and Corbin, 1998), would be carried out line-by-line using gerunds, which 'helps to define implicit meanings and actions and…suggest emergent links between processes in the data' (Charmaz, 2014, p121). The identification of implicit meanings and actions is congruent with a SPT approach. Initial coding would then be focused iteratively by re-visiting the data and by comparing with the literature review and the document analysis, checking for recurring words and phrases and looking for similarities and differences (Robson and McCartan, 2017). This 'splitting' (Saldana, 2016, p23) of the data appealed, as it gave me confidence that nothing would be missed.

However, having carried out initial analyses and still mindful of the need for rigour, my plan for data analysis was modified. There were two main reasons: firstly, the recognition that not every line of interview transcript was relevant and secondly the need for visual representation. I therefore decided that Miles and Huberman (1994) offered an appropriate extension to the framework for my data analysis. The three major phases of their approach: data reduction, data display, and the drawing of conclusions and verification, replace quantitative formulas with rigorous thinking, effective presentation of evidence and careful consideration of alternative interpretations.

The data needed to be meaningfully reduced or reconfigured in line with the research questions, while remaining open to inducing new meanings (Berkowitz, 1997). Initial coding was done by identifying and recording key points, more akin to the 'lumping' approach described by Saldana (2016, p23), but still using gerunds, or active forms of the verb, to focus on practices (Appendix 2a). Having coded two transcripts electronically in tabular form, I submitted the sample for checking to my 'research-literate outsider', as pre-arranged. This strategy was valuable in two ways: it encouraged clarity and precision in my initial coding process and the 'outsider' feedback drew attention

to a small number of 'implicit meanings' (Trowler, 2016a) that I had drawn from the transcripts. These meanings were induced from insider knowledge, a factor which I was thereafter more alert to in coding the text and writing up the findings.

How the data was sifted required a decision about whether coding would be carried out electronically or manually. Although I appreciated the advantages of electronic coding systems such as In Vivo and CAQDAS in both speed and ability to manipulate the data (Saldana, 2016), I favoured a manual approach, and for two reasons. Firstly, I am not a competent user of electronic applications any more advanced than Word, which provided the functionality I needed. Rather than compare data on a computer, I developed an 'open codebook' in the form of A1 boards to display the data, which was then physically rearranged, presenting a - literally - bigger picture than could be achieved on screen (Appendix 2b). I manipulated the data using post-it notes to identify categories, which were then sorted into themes, using highlighters to indicate the relationship between them. Secondly, coding the data manually maintains contact with the text and the sense of analysing while organising, thus allowing for more intuitive connections to be made (Saldana, 2016). I also recognised that manual coding and the more obvious intervention of the researcher in qualitative data analysis raises questions about subjectivity than electronic coding, even though the same researcher's influence would be shaping the electronic coding process (ibid). It was at this stage that the use of memos was most critical in recording the process, which then acted as an aid to reflection and helped to maintain internal validity.

I anticipated that developing an approach to bring some clarity to my interpretation of the messiness of the everyday working of the participants (Miles et al, 2019) would involve some trial and error and much re-arranging and re-grouping ensued. I identified themes, brought themes together, eliminated minor themes and focused on the main themes which would form the basis of the findings in a manner which corresponded to the systematic 'sort, sift, think and shift' approach (Maietta et al, 2021) and which imposed a discipline and rhythm on the process.

Verification included 'tactics for generating meaning' (Miles and Huberman, 1994). This included noting patterns, clustering cases, making contrasts, partitioning variables and subsuming particulars into the general to address concerns about whether the conclusions being drawn from the data were credible, defensible, warranted and able to withstand other interpretations (Berkowitz, 1997). It also involved treating outliers, which emerged in the form of two private providers, as a challenge to further elaboration and verification of an evolving conclusion (ibid).

Two further strands completed the interview analysis strategy. Responses to the direct question about Trowler's typology were collated using the quadrant (Fig 4.1) to plot the relative position of participants within the categories of academics' responses to change. Additionally, noteworthy examples of use of language were recorded in table form and gradually developed into a significant sub-theme, illustrating the changed relationship between the HEIs and the new regulatory body.

5.4.3 Documents

The six documents supplied by the participants were first analysed using the themes identified from the transcript analysis. My method of discourse analysis then provided a structured way of interrogating the documents. Initially, there are some scene-setting questions (O'Connor, 2007) regarding the status of the text, who produced it, for whom, for what purpose and with what level of power or authority. Subsequently, close attention to language and the focus on structured meaning was particularly relevant to the interpretation of polysemous signs such as 'quality', 'peer' and 'enhancement' which are critical to the participants' understanding of external policy texts and how they are translated into internal documentation. From examining the linguistic choices made at the micro level, semiotics then encourages consideration of how these relate to the meso and macro levels of interpretation in a structured, iterative process (Chandler, 2017). From this analysis it was possible to compare the meanings generated from the documents with those of the transcripts and the wider policy

context examined in the Literature Review. Where appropriate, extracts from the documents have been used to illustrate the findings.

5.5 Summary

My research design enabled the research questions to be addressed. It was based on clear theoretical assumptions which were used to construct a coherent methodology, taking into account the arguments pertaining to the concepts of validity, reliability and reflexivity in relation to the nature of qualitative research methods. Because the research questions had a clear aim and contemporary relevance, and the research design was internally consistent and adaptable, this study constitutes a useful contribution to research in a developing subject area. It has the capacity to deliver a better understanding of the practices of the participant group and how they relate to policy. Along with some limited generalisability to the wider group, the aim to generalise to the chosen theory within this context was achievable.

Chapter 6 Findings and discussion

This chapter sets out and analyses the findings from the interviews with 20 QPs in the English higher education sector. Reference is also made to documents volunteered by the participants to illustrate specific changes to quality assurance practices which they have introduced. The findings are organised into six sections based on the key themes that have emerged, both deductively from the interview questions and inductively from participants' responses. The themes are aligned to the research questions:

Section 6.1 A community of practice in the third space addresses the first part of RQ1: how QPs see their role as part of a community of practice, characterised by working on a 'third space' task.

Section 6.2 Marketisation and the community of practice continues the second part of RQ1: participants' responses to marketisation and the changing regulatory system, how change has impacted the meaning of quality and the effects on the community of practice.

Section 6.3 Changes to quality practices addresses RQ2: the principal changes which participants have introduced, the materials and competences deployed, and the effects on institutional roles and the community of practice.

Section 6.4 Enacting policy addresses RQ2, how policy change was effected and the responses of staff and QPs to the changes.

Section 6.5 Implications for the quality assurance of teaching and learning explores RQ3: QPs' expectations and concerns about future developments in higher education quality assurance.

Participant and institutional anonymity is protected by alpha-numerical coding, but the code indicates whether they are members of private providers (PP1-5) or public universities. The code also shows which mission group the public universities belong to: Russell Group (RG1-4); former 1994 members (NN1-2);

University Alliance (UA1-2); MillionPlus (MP1-2); Guild HE (GHE1-2);
Cathedrals Group (CG1-2); and unaffiliated (UN1).

Mission Group/type of HEI	Participant Code	Participants' Institution
Russell Group	RG1-4	RGInst1-4
1994	NN1-2	NNInst1-2
MillionPlus	MP1-2	MPInst1-2
University Alliance	UA1-2	UAInst1-2
Guild HE	GHE1-2	GHEInst1-2
Cathedrals group	CG1-2	CGInst1-2
Non-affiliated	NA1	NAInst1
Private providers	PP1-5	PPInst1-5
Total	**20**	**20**

Table 6.1 Participant and institutional codes

6.1 A community of practice in the third space (RQ1)

This section presents the findings relating to the role and positioning of QPs,
both institutionally and within the higher education sector. It is divided into two
themes. The first focuses on participants' perceptions of their professional
identity, using Whitchurch's (2008a) concept of the third space; the second on
the extent to which QPs believed themselves to be part of a community of
practice (Lave and Wenger, 1991), learning and sharing knowledge about
quality assurance. Both inflect on how they negotiate the institutional space in
carrying out their roles and responding to external policy change.

6.1.1 The third space

The majority of participants identified with Whitchurch's (2008a) concept of a
third space, which locates QPs institutionally between academia and other
professional administrative or management staff. When asked how they

experienced the third space, participants responded by describing their role in three ways: in relation to teaching and learning; as perceived by others; and the extent to which their positioning enabled them to influence and enact policy, thus raising issues of professional identity, credibility and power.

6.1.1.1 Professional identity

Participants' professional identity was primarily expressed in relation to academia, initially describing the institutional relationship between the quality assurance function and teaching and learning. In the smallest institutions sampled, overall responsibility for quality assurance and teaching and learning were combined (PP2, PP4); in the larger they were separated. In eight institutions, quality assurance was located within Registry and associated with administrative functions and in the remaining ten it was a separate function, with no discernible relationship to mission group or any other inclusion criteria (see Table 5.2). Regardless of the organisational configuration, participants' beliefs about the functional relationship between quality assurance and teaching and learning were largely consistent:

> I hate it when people refer to Quality like Finance. I see it as working in partnership with academic departments and colleagues to a common agenda. (GHE1)

The majority similarly viewed quality assurance as a complementary function 'running alongside our core activity of teaching and learning' (UA2). One participant went further, asserting that 'It is absolutely teaching and learning…you do quality all the time' (UA1) and expressing frustration with the notion of the 'quality professional' because it absolved academics from responsibility for quality. From the participants' perspective, quality assurance had parity with teaching and learning, confirming the neo-liberal elevation of managerial and administrative functions (Maassen and Stensaker, 2019), but resisting the 'de-coupling' (ibid) of quality assurance from the core academic activity, with only one variant opinion:

I think it's a separate function. From my perspective, we have business areas and there is a suite of support units to ensure that those areas can function, which would be my department, Finance, Premises, Learning Support and HR. I see my team as the support to enable the business to do its job, along with other support teams. (PP1)

For this participant with a non-higher education background from a private provider in the business disciplines, teaching and learning was the 'business' and quality assurance one of many support functions. Although a singular view, it was noteworthy in revealing a more rational-purposive understanding of higher education and a different inflection on the role and professional identity of quality assurance practitioners.

6.1.1.2 Credibility

In relation to Gornitzka and Larsen's (2004) criteria for professionalisation, the QP's role fulfilled the criterion of 'status', with all participants holding senior management positions. More contentious areas were the lack of 'qualifications' and a 'common cognitive base' (ibid), attributable to the heterogenous backgrounds of participants. Nine had careers in higher education quality, or related areas such as administration and student services; seven were from teaching in a variety of disciplines; and four were from outside the sector: engineering (GHE2); law (PP1, NN2); and the motor industry (PP5).

The lack of recognised, standardised competences in quality assurance (Martin et al, 2021) both fed into the notion of a niche third space and raised issues of the worth and relevance of quality assurance:

There are certain members of management who think that quality assurance is a 'nice to have' rather than a requirement. As a team, we've experienced certain academics that see us as level of bureaucracy and they don't really understand why it's so important, or what we bring to the college. (NN2)

The need to be thought of as 'credible' by academic colleagues was cited by eight participants as critical to their professional identity. Credibility was either earned from demonstrable competence in the quality role against a recognised external standard: 'the positive review outcome made them realise that I knew what I was doing' (MP1); or more readily granted to former academics. For one participant, credibility with academic staff was based on 'professional respect and expertise' (GHE1), but largely derived from the legacy of her former teaching role within the institution and her ability to cross that internal professional boundary (Whitchurch, 2008b). For a participant with a non-teaching background, there were barriers to overcome:

> I have felt discrimination because I'm an academic administrator, not an academic. To get around it, I have gone out of my way to do things that enhance my academic credibility, such as gaining principal fellowship of the HEA. (CG1)

One solution to a lack of academic credibility was therefore to acquire the competences associated with academics. Such actions raised issues of role ambiguity (Bowling et al, 2015) with the potential for re-shaping the identity of QPs and re-inscribing the internal boundaries between quality assurance and teaching and learning. At the level of everyday practice, credibility with academic staff involved the ability to 'talk the language of curriculum design and aspects of learning and teaching' (GHE1), engage in disciplinary-specific discourse (UA1), and understand the practices associated with multiple academic subcultures, in other words, act in an academic environment with the help of academic means (Seyfried and Pohlenz, 2018). The need for continuous code switching (Anichich and Hirsch, 2017) as an indicator of professional competence further highlighted the complexity of the of the third space role and the tensions inherent in maintaining an effective working relationship with academic staff.

Participants recognised the limitations of the third space, especially for smaller institutions with small quality teams. Without exception, they sought external contacts for advice and to enhance their credibility within the institution,

confirming the importance of networking as an indicator of professionalisation (Gornitzka and Larsen, 2004) and as part of the strategic construction of identity (Martin and Ibbotson, 2019). The most frequently mentioned formal organisations were the Academic Registrars' Council (ARC, 2020), QSN (QSN 2020), QAA and Advance HE (Advance HE, 2020), which offered conferences, training and practical materials to build their cognitive base. Mission groups, notably Guild HE, were credited with providing advice and acting as a focal point for responses to public policy. Informal networks, ranging from local partnerships to: 'I phone people up and have a chat with them, or just a WhatsApp exchange' (MP1), were a source of personal validation:

> Just occasionally you have one of those moments where it's: 'This is really broken, I'm going to get into so much trouble.' And there are a handful of people that I would call up: 'Whoa, I think I've broken something.' And they'll either tell me it's fine or how to go and mend it. (CG1)

Many similar examples of the support and learning derived from regular physical and virtual interaction with other QPs were provided. Together, these multi-stranded formal and informal networks constructed a virtual community of practice, extrinsic to their institutions, which had 'legitimacy to define competence' (Farnsworth et al, 2016, p9) in quality assurance and reinforce participants' status and professional credibility.

6.1.1.3 Power and influence

The perceived efficacy of the third space QP depends on how well they feel they are supported internally to achieve their task (Seyfried and Pohlenz, 2018), in this case to enact policy and changes to practice. All participants felt their role had power and influence, the source of which was identified as both structural and personal. Structural or positional power came from their seniority within the institution. All held senior positions, denoted by their job titles, from Deputy Vice Chancellor of a large university and Vice Principal of a small private provider to 'Heads' and 'Directors' of the quality functions of those institutions in between, reflecting the institutional power shift towards the

administrative functions observed by Krucken and Meier (2020). Being involved in multiple functions and able to make 'numerous interventions' (RG1) which brought them into contact with people across the institution, including governors, was also cited as a source of power and influence and highlighted the importance of horizontal relationships in securing organisational effectiveness (Handy, 1993).

In addition to competence-based credibility and academic reputation, personal power was attributed to the forging of internal networks over time and 'working through a very strong set of shared values which the majority of staff buy into' (GHE1). I8 participants were unequivocal in asserting their identification with the mission and values of their respective institutions. Shared values were a reason for joining, notably in the specialist institutions: 'I ended up in a cultural home' (PP3); a facilitating mechanism: 'you couldn't work here unless you had that alignment (PP4); or expressed as a joint social commitment reflecting a public university's mission:

> It's perhaps easier with an institution like CGInst2 where we have a clear social justice and widening participation agenda; we look at our quality assurance with that lens. (CG2)

Institutional values and priorities differed, but responses demonstrated a similarly high level of commitment. Most felt that their identification with the values of the institution was the result of a reciprocal acculturation process, resulting from 'longevity of tenure' (GHE1) and 'ongoing involvement across the institution' (UA2). The two participants who did not share the values of their institutions were relatively recent appointments, one for the purpose of securing DAPs and 'developing a higher education culture' (PP2) and the other with a remit to challenge the dominance of a traditionalist academic body and transform the 'weak quality culture of the institution' (RG3). Institutional values were therefore seen as a powerful instrument through which participants could effect change (Alvesson, 2013) and one which they had the power to shape: 'I'm hoping I've aligned them more with me' (MP1). Although typically expressed in static terms as a set of overarching shared values (Silver, 2003),

participants' references to their part in influencing institutional values through practices developed and changing over time echoed Trowler's (2012) description of how power is harnessed and exercised by individuals within cultures through social interaction.

Occupying a third space had significant consequences for the professional identity and credibility of participants, and their ability to exercise power within their institutions. Within this space, participants saw both the advantages and disadvantages conferred by professional distance from the academic community in enacting their roles. The majority agreed with Whitchurch's positive perspective that the third space lent the advantage of fluidity and objective distance, 'enabling the institution to understand what is going on under the bonnet' (RG4). A more ambivalent position was taken by (MP1) as 'the thorn in the side of the University', simultaneously conveying both the capacity for influence and otherness of her role, and (PP3), in observing 'a little bit of negativity around us being seen as the gatekeepers' (Shoemaker and Riccio, 2016), operating between the senior management team and academics, and therefore not able to be open with staff or gain their complete trust. The principal disadvantage and minority opinion expressed by (CG1) aligned with Akerman's (2020) view that the work of third space QPs remained 'undervalued', requiring an ongoing struggle for due recognition.

Issues of identity, credibility and power relations generated in an institutional third space were part of the cultural context in which QPs engaged in quality assurance practices and responded to external change. The characteristics of this niche third space also informed the wider community of practice which existed outside their respective institutions.

6.1.2 A community of practice

Communities of practice are defined according to their mutual engagement in a task, shared repertoire and discourse, typically bounded within an interactive domain (Lave and Wenger, 1991; Wenger, 1998), which lends identity to its members and has been extended to incorporate the virtual and the social (Nussbaum-Beach and Hall, 2012).

The third space location of the quality assurance task, combined with the comparatively small size of institutional quality teams, led participants to seek validation and support extrinsic to their institutions, creating a community of practice with a physical and virtual dimension, which all participants identified with. This community encompassed the characteristics of the third space with its attendant advantages of objectivity and institutional influence, but also circumscribed by issues of identity and credibility and one whose origins extended back over 25 years. The history of a community, as perceived by its members, becomes the frame through which change is viewed (Clark, 2017). All participants were employed in quality assurance roles before the advent of HERA and were therefore familiar with the sector-owned Quality Code as the key artefact in a process-based regulatory system, and the peer-review regulatory style of QAA. Additionally, 16 participants were QAA-trained peer reviewers, providing a related area of mutuality and a further external community of practice overlay (Trowler, 2012) in a role traditionally undertaken by most senior QPs as a means of professional updating. With no standardised QP qualification (Galport and Azzam, 2017), being a trained peer reviewer conferred credibility internally and 'means I'm seen as a bit of an expert in other universities' (MP1), thus approaching the criterion of professionalisation set out by Gornitzka and Larsen (2004).

In this period of transition from a process to an outcomes-based system of quality assurance under HERA, participants' views on the nature and primary purpose of the task remained the principal bond. All participants cited core quality assurance activities associated with 'the student journey from admission to graduation' (NA1), as part of their remit, although some differences emerged over responsibilities, contingent upon the institution's size, structure and mission. In larger institutions participants had oversight of a team with delegated responsibility for quality assurance, while in one small provider the role was combined with additional management functions. Structurally, quality assurance was either part of Registry, or more closely allied to academic policy and governance (Table 5.2), its position reflecting the underlying ambivalence in the relationship between quality assurance and teaching and learning, and between quality personnel and academics. Institutional mission statements

required participants to balance the imperative for excellence against the obligation to widen participation, or to defend their Arts provision against a governmental preference for STEM subjects. Although these instrumental factors meant that participants' roles may be differently constituted, located perceived and supported, there was a broad consensus that the main purpose of their quality assurance role was to 'improve the student experience' (NN2). This shared aim, plus 'enabling teaching and other staff to support students' (GHE1), was what they most valued and delivered 'a meaningful way of being' (Wenger, in Farnsworth et al, 2016), consistently expressed in a discourse of support and enablement. The findings indicated an established community of practice, predicated on peer-ness and focused on support and learning, rather than concern with the exercise of power, in keeping with Lave and Wenger's (1991) original concept.

6.1.3 Summary

The majority of participants concurred that they occupied a third space within their institutions, which raised issues of professional identity, academic credibility and institutional power, with similarities and differences in perceptions which crossed notional boundaries of mission groups and the public/private origins of the institutions. There was however a strong sense of an external community of practice, albeit with shifting boundaries, which contributed to the sense of a complex and evolving policy environment against which participants' attitudes beliefs and values were framed.

6.2 Marketisation and the community of practice (RQ1)

The effects of the marketisation of higher education on participants' identities, roles and the quality assurance community of practice addresses the second part of RQ1 and are organised into three sub-themes: competition; the OfS; and quality and quality assurance. These themes illustrated how participants positioned themselves in relation to a changing national policy, regulator, and regulatory system. A social practice lens is maintained, with a focus on the discourse shared by participants and on the 'meanings' (Shove and Pantzar, 2005) about higher education deregulation generated by QPs. As carriers of

quality assurance practices, participants' responses inflected on their place within a changing community of practice.

6.2.1 Competition

Participants' attitudes to the marketisation of the sector and the principle of competition as the driver of choice and quality (Marginson, 2013; Komljenovic and Robertson, 2016) were informed by their beliefs about the purpose of higher education:

> Across the sector, whether it's private providers or Russell Group institutions, I think the majority of us would say the same thing. We're not there just to produce people to pay taxes and to hold the top jobs in society. Universities are much more than that. It's about educating people and making them better human beings. (PP3)

The 'public good' approach, which sees higher education and the market as irreconcilable (Furedi, 2010), dominated the sample, but the antithetical 'market forces' view was also represented:

> For me, higher education in the future should be driven by the market. We are developing products to fulfil a place in the market and it's for employers and for our graduates to fit into the work environment. That's where I think HE is moving towards and it has to reinvent itself to make sure we're fulfilling the requirements of that market. (PP5)

Both comments were made by private providers, but in the Creative Industries and Business respectively, indicating a significant tension within the community of practice, but between disciplines, rather than whether they were 'for profit' institutions, and pointing to a complex pattern of relationships, as private providers assumed their place in the community under HERA (Hunt and Boliver, 2019).

6.2.1.1 Choice

Private provider participants welcomed the opening up of higher education under HERA, which had increased the choice of provision at the point of entry. The inclusion of newer, smaller, private institutions 'in the same pot' (PP4) had changed the constituency of the QPs' community of practice, but to no greater extent than its already diverse mission groups (Fielden and Middlehurst, HEPI, 2017), according to their public university counterparts.

Although private provider participants were inclined to see themselves at the periphery rather than at the centre of a community inhabited by the 'old established institutions' (PP4), membership conferred the intended benefit of equal footing with public universities and afforded 'better recognition within the sector, credibility, and raised our status a little within higher education' (PP4). The HERA's recognition of different types of organisations and non-traditional ways of delivering programmes (Knight, 2010) allowed smaller, specialist providers to demonstrate that they could deliver 'a good quality experience' (PP1) and reflected positively on participants' professional standing.

Having gained access to an ostensibly more inclusive community, retaining their place in a competitive market governed by neoliberal market forces had become potentially more difficult for all institutions:

> It's the focus on us as individual, competitive institutions who should expect no quarter and the basis of it is a marketised approach to higher education which imagines a future in which institutions go bust...I think that it's blown a very cold wind of capitalist reality through the sector…it's created a sense that members of the sector are left to sink or swim, rather than being part of a community of practice. (NN1)

This comment resonated with Marginson's (2013) assertion that although higher education may be required to simulate business, it was inimical to the sector to operate according to capitalist principles and subject itself to financial instability and the dissolution of institutions.

Concern was also expressed that a utilitarian approach to higher education, driven at national government level, threatened the future of programmes and

institutions in areas such as the Creative Industries (GHE2), in what one participant described as:

> A general impetus away from the Arts and Humanities towards advancing education, engineering and medicine, of focusing on what's useful in higher education. (UA1)

Whether as an unintended consequence of competition, or an intended effect of government policy, the predicted reduction in specific types of provision and provider would mean a considerable change to the democratic of higher education and the dynamic of the community.

The consequences of competition for the community of practice were broadly shared and envisioned as fragmentation; lack of collaboration; the isolation, or alienation, of individual quality practitioners; and job losses, with a reduction in choice of provider. The interrelated implications for the quality of provision and quality assurance are more complex and discussed in 6.2.3.

6.2.2 The OfS

Of the changes introduced under the HERA, participants considered the establishment of the OfS as the regulatory body and the diminishing role of QAA as the most significant. Participants' responses showed little variation and consistently compared the two bodies' approaches to regulation and their relationships with a higher education sector to the detriment of the OfS. For a community accustomed to autonomy, coregulation and peer review, the key issues for participants were the effects of an autocratic approach and authoritarian discourse on the ways in which they experienced their daily roles.

Regardless of the participants' position in relation to the marketisation of higher education, or the size and type of their institutions, responses to the OfS were largely negative:

> The approach of the OfS has not been welcomed, certainly at RGInst2 and I think by a lot of the sector in that it's very much 'stick rather than carrot'. The relationship is quite strained in that it feels as though the

OfS, as directed by the government, don't really trust the sector, or feel that the quality is sufficient and they just need to find it and fix it. I think there's definitely been a cultural shift. (RG2)

The cultural shift was located in the positioning of the OfS as an authoritarian extension of government, its problematising of higher education and its inappropriately rational-purposive approach (Beerkens, 2015) to improving quality. As an arm of government, the OfS was felt to expose participants to 'the whim of some individual in power that decides we're going to do it this way now' (UA2), creating an instability within the institutional workspace (Tight, 2012).

The extent to which participants felt the OfS to be 'very autocratic' (PP4) and a threat to the autonomy of the sector depended initially on their perception of relative institutional power. For the majority of participants, particularly Russell Group and former 1994, the new regulatory arrangement was viewed as disempowering. This perception was derived from the reductive focus of the OfS on accountability (Wrigley, 2019) and its failure to recognise that established, autonomous institutions were capable of developing their own peer-based approaches to assuring and enhancing quality. For some, this meant that they were either ahead of OfS demands, or 'would have got there anyway' (PP3), but as part of the natural evolution of the quality assurance processes within their respective institutions:

We've made our processes more streamlined and more effective, and again that's not just a result of HERA, that's been a trend for the past 10 years or so. (RG2)

For many participants, the asymmetrical relationship with the regulator and one-way accountability undermined the trust (Hoecht, 2006) which had held the sector together in a self-regulating process and underestimated their professional competence and abilities.

For most participants, the autocratic approach of the OfS was experienced negatively through its 'compliance-led system' (PP3), although one private provider participant found this approach helpful 'because it makes it clearer for

my Board and much easier for me' (PP1). The issue of compliance revealed a variation in opinion, with a minority believing that the approach to quality assurance was 'now less about compliance and you have to do this because QAA says so' (CG2). However, most participants, notably those who were peer reviewers or had worked in another capacity for QAA, agreed with Raban and Cains (2014) that 'we had the latitude' (MP1) and this criticism was undeserved:

> One of the good things about QAA was that it always worked from the basis that that if you could justify a particular position, because of the particular context of your university, then that was fine. (CG1)

The ability to engage in dialogue with the former regulator exemplified the essential peer-ness of academic communication (Nicholas et al, 2015), allowing participants to exercise their professional judgement. The negotiated outcome ensured that the quality assurance process remained relevant to the institution, sustained participants' credibility and guarded against them becoming involved in inauthentic forms of compliance (Cardoso et al, 2018).

One of the most significant challenges for participants associated with the compliance approach under the OfS was exemplified in the changed discourse. At the most fundamental level, the collective ways of knowing and understanding, cemented through interaction and unique to a specific setting had been transgressed (Reckwitz, 2002). Participants noted the 'reluctance to have any dialogue' (GHE2), exacerbated by a lack of clarity and guidance regarding requests for information:

> One of the OfS rules is you must report events that we consider to be reportable but we won't tell you whether it's reportable or not, and if you report something that's not reportable then we will assume that you don't know what you're doing. And if you don't report something that is reportable, well, you don't know what you are doing, and if you ask us if it's reportable, we'll also assume that you don't know what you're doing. (PP4)

Expressed as an impenetrable conundrum, such perceptions left participants frustrated and insecure. To compound these feelings, the established discourse (Lave and Wenger, 1991) of quality assurance, formerly characterised by 'dialogue, negotiation and the principles of peer review' (RG1) under QAA's collegial communication style (Blackmore, 2005), had been replaced in the opinion of some by the issuing of threats from an authoritarian apparatus of the state:

> The Secretary of State is using the OfS to threaten the sector, which is a group of autonomous organisations, supposedly. We're being threatened with loss of educational programmes…so that inculcates a culture of fear across the sector, but it also inculcates a form of separation from the previous collegiate approach, and it becomes much more of an inspectorial system. (MP1)

That 'the OfS is not your friend' (UA1, NA1) was a recurrent sentiment and there was a contingent view that the regulator had arrived with a 'focus on being able to punish' (GHE2). The language used in describing the OfS and its approach frequently had connotations (de Saussure, 1983) of 'policing' (NN1, GHE2), reflecting the restructuring of relationships at the meso level of the institution and the macro level of policy (Potter 1997, 2009) and leaving participants feeling distanced and unsupported. One participant's Powerpoint presentation, designed to introduce the OfS to senior staff and governors, depicted a bulldog with bared teeth (doc NA1), in a telling comparison to the former 'toothless watchdog' (Education Select Committee, 2008). 'Tacit knowledge' (Trowler, 2005) or 'know-how' (Alkemeyer and Buschman, 2017) and 'implicit meanings' (Trowler, 2016a) about quality assurance as a collegiate process contributing to the enhancement of higher education were being challenged by an alternative construct within a set of altered power relations (Trowler, 2005) and an implicit threat to sectoral autonomy. Some participants regretted past sectoral criticism of QAA's review methodology for subjugating the workforce (Lucas, 2017) and creating courtroom dramas (Harrison and Lockwood, 2001) in which participants parroted lines (Green, 2017), 'because we've ended up thinking that it could potentially be worse with the OfS' (RG4).

The rapidly changing culture around the OfS caused some participants to re-evaluate the meaning and purpose of quality assurance to the extent that 'there have been times I've thought it's not really interested in quality and standards as I understand it' (GHE1). The level of cognitive dissonance culminated in one participant calling into question her compatibility with a role held for 10 years:

> When the OfS were starting to issue edicts about various things, I did think - I don't think this is the right job, or that I am the right person for this job as it's becoming. It was the first set of changes, when they were starting to abandon the concept of the Quality Code and taking out stuff around enhancement and student engagement. It was - this is not what I want to do. (CG1)

The sense of being ill-equipped to play the part within changing external circumstances invokes Goffman's (1959) critical linkage of role and context, where the stability of role is inextricably linked to the physical and social environment (Argyle, 2007). Both participants ultimately displayed 'grit' (Duckworth, 2016) and resilience in finding ways to 'get over myself' (CG1) and overcome feelings of dislocation by accepting the challenge of dealing with the authoritative style of the OfS. In this endeavour, they were able to draw on the support of a community of practice (Naidu, 2018) bound by a high level of agreement about the problems of engagement with the new regulatory body

Participants' concerns about the change in style of the OfS and the uncertain future of QAA also extended to the broader activities undertaken by QAA, such as its work around academic misconduct and academic integrity which 'is really helpful and one of the biggest issues for the sector' (NA1). Another expressed the generally-held view that the sector needed a body to maintain continuity and host an ongoing conversation about quality assurance matters:

> I think there's a role for an organisation like QAA to maintain something which looks like…advice and guidance…a body of work knowledge, that talks in some detail about quality assurance and how it can be specified and managed, even if it's not going to be mandatory. And my sense is

that's the way a lot of institutions feel and that's the reason why some still would contribute voluntarily to QAA. (PP2)

QAA's long-term institutional memory (Handy, 2020) had provided a repository of knowledge about higher education quality assurance that had given a focal point to the community. Participants had become accustomed to QAA as a discursive centre which they could draw on for guidance and support and were concerned about the loss of one of the more intangible benefits of coregulation at the centre of quality enhancement (Harvey and Williams, 2015) to a reductive and marketised higher education sector.

6.2.3 Quality and quality assurance

Of the changes introduced by the OfS, participants considered the transition from process to outcomes as the means for assuring quality to be the most far reaching, with implications for their roles and the community of practice. The sub-themes were cyclical peer review; the Quality Code; external examining; enhancement; and metricised accountability. Significant differences of opinion were evident in the responses, which again cut across the sector.

6.2.3.1 Cyclical peer review

Feelings about the end of cyclical peer review were mixed. While wishing to retain the multiple functions and regulatory style of QAA, most participants agreed that some change to external quality assurance was overdue. Some criticised QAA for having presided over the same system for 25 years, leading to 'gold plating and overkill' (GHE1) which had become 'burdensome' (RG2). Others commented on its unresponsiveness to a sector grown tired of the same review format, echoing Harvey's (2002) view that view that the process had become 'a box ticking exercise' (RG2) and too mechanistic:

> The call from the sector was: 'We don't want the same thing, over and over again. We want nuance, we want targeting, we want risk.' (RG1)

Despite the acknowledged flexibility under cyclical peer review, it was noted that there had been insufficient time in between review visits to risk innovation

and that peer reviewers had therefore tended to reinforce routinised behaviours (Hand at al, 2005), extant meanings and the established ways of doing things within the sector:

> Institutions were always nervous about introducing too much change in the last 18 months of that cycle. They wanted embedded systems that they could demonstrate were working and so there were probably two or three-year moments of stagnation in most institutions. I think you can be much more fluid and much more developmental nowadays. (UA1)

Participants appreciated the greater flexibility now permitted in the design and enactment of internal quality processes and acknowledged, in agreement with Alderman (2009), the capacity to address more contemporary issues of public concern:

> There are some focuses now that I think are right, that institutions take grade inflation seriously. The increased focus on equal opportunities and gender, BAME, the awarding gap, is a good thing, whereas in the past QAA deliberately steered away from grade inflation and just focused on the threshold standard and I don't think they should have. (UA2)

Participants were evidently neither inherently nor intrinsically averse to change and evinced a high level of agreement that issues of social justice should be at the forefront of higher education quality assurance.

Although a more risk-based approach to review was welcomed by the majority, the predominance of metrics in judging the quality of provision was of concern to smaller providers. In accordance with Alderman (2009), some predicted an inequitable future where they would be regularly reviewed because of potential anomalies arising from their small data sets, while larger institutions would not be subject to the same scrutiny, based on past reputation:

> They haven't inspected some schools that have got an outstanding judgment for more than 10 years. There's got to be balance - clearly there's a risk-based approach in how much you want to get in amongst

the weeds with individual providers, but you can't give carte blanche to a place that is happily achieving the outcomes, when that might just be the nature of what they do and with whom they do it. It doesn't mean that they're necessarily very good. (GHE2)

(GHE2) noted that this assumption had been made under Ofsted to the detriment of the school sector and that 'process is important, not just outcomes', as the latter cannot be delivered sustainably without the former.

What most participants regretted about the demise of cyclical peer review was the absence of the regular external perspective afforded by peer contact (Kajaste et al, 2015) as a means of disseminating good practice:

> There is something lost by not having those regular engagements with peers. One of the things which I think that NNInst1 needs to do better is fully using external advice and being part of that wider peer community. And the QAA review was a very good example of using peer knowledge to enhance. (NN1)

One participant stated that their institution was 'determined to retain an external review process' (PP2) for reassurance, highlighting the importance of routines within an established culture (Reckwitz, 2002). Another suggested that their institution would be carrying out interdepartmental reviews to retain the valued peer element of the former process.

Although contrary to the expectations of Shah et al (2014), there was little reference to the potential loss of QAA student reviewers as part of the enhancement process. Instead, participants seemed convinced that the efforts made to engage students in every aspect of their journey, which had become a priority since *Students at the heart of the system* (DfE, 2011), had become embedded under the old system and would continue, impelled by the more recent commercialisation of the relationship (Davidson-Harden, 2010).

6.2.3.2 The Quality Code

All participants regarded the Quality Code, in its various iterations prior to 2018, as fundamental to the repertoire of documents generated externally and internally for the purposes of quality assurance. Responses revealed the depth of ownership of the Quality Code, but tempered with some variations in the understanding of its regulatory status. These differences influenced participants' views about the 2018 revisions and revealed tensions within the community's attitudes towards the new instrument of regulation.

There was a strong sense of the embeddedness of the Quality Code within the fabric of most institutions, because of its origins within the sector:

> From the moment it was created, as the Academic Infrastructure with a Code of Practice and the FHEQ, we felt that it reflected our existing practice…the Quality Code afterwards merely reflected commitments we already had and are deeply embedded in our internal framework, so when they were updated, they provided a really good moment for us to check that we haven't lost sight of any particular aspect of the student experience or standards. The Quality Code was so useful on that front and it now, genuinely, in its purest sense only exists because the sector wants it to. (RG4)

Most participants had used the Quality Code as a peer-to-peer guidance document as intended (Brand and Millard, 2019), although over time the expectations of the Quality Code had come to be interpreted as obligatory (Ashwin et al 2015), with some participants regretting the loss of its coercive power internally:

> We can no longer point to the Quality Code and say, 'we must do this, or we will be in trouble', because it really doesn't exist anymore (GHE1)

According to one experienced participant, the belief that the Quality Code required compliance and a particular way of doing things was engendered by cyclical peer review:

Review made it a kind of regulator touchpoint and therefore the Code becomes tainted by the notion of 'this is how you must do it'. It was never meant in that way. (RG1)

This insight showed how repetition over time among peers can embed and prefer certain meanings (Trowler, 2012). Quality practices were reinforced and routinised temporally through the process of review, with participants - as peer reviewers - looking for the familiar in other institutional practices. The belief that the Quality Code required compliance allowed space for the view that 'the slimming down of the Quality Code has allowed that much more flexibility' (RG2), giving institutions the freedom to develop their own ways of assuring quality.

Despite these misperceptions and perceived limiting effect for some participants, the proposition that the Quality Code may be discarded provoked strong reactions, 'a sort of shock-horror that the Quality Code is not going to be part of the Conditions of Registration' (NA1). Most participants echoed the sense of ownership and ongoing relevance in stating that they would continue to use the original Quality Code to 'set up and check their quality assurance systems' (CG1) and expressed the belief that because they had 'grown up with it' (GHE1) and it was deeply embedded in individual practitioners routinised behaviours, that its principles would survive and hence remain pivotal to the community of practice. However, some pointed out that an internalised repository of knowledge was not easily accessible to new providers in a marketised landscape and limits the 'legitimate peripheral participation' (Lave and Wenger, 1991) through which newcomers are engaged in communities and introduced to its activities, identities, artefacts, knowledge and practices:

If you are a new provider, you'd be thinking 'how do I know if this is right?' You don't necessarily have a hinterland of other colleagues you can talk to. And if you are a private provider, arguably, you'd be seen as being competitive rather than collaborative. (RG1)

Freedom of interpretation may not be an advantage for newcomers without the confidence to experiment with flexibility, as more mature institutions might.

Concerns were expressed as to the form quality assurance might take if there were no Quality Code to act as guidance:

> I think we are going to get a weird quality assurance coming through with some of the newbies; they just won't have the context that I've got through being older. Maybe it's a good thing to not have some of that baggage, but I think there are some things that people do need to understand. (CG1)

The point about 'baggage' was pertinent for carriers of culture and some participants were persuaded that it would be advantageous if QPs were encouraged to think for themselves, rather than rely on routinised practices which could lead to them becoming hostage to their own history (Clark, 2017) and oblivious to the learning that can take place at the periphery of the community (Wenger, 2000):

> Are there different ways that we can think about doing things? I don't have any sort of immediate lightbulb moments, but it gives us an opportunity to think about things differently, rather than just carrying on doing things because people have always done them. (MP2)

Although participants had applied the original Quality Code with different degrees of stringency, there was some ambivalence about the flexibility offered by the revised Quality Code. Its potential for encouraging innovation was set against concerns that it would marginalise newcomers and that increasingly diverse practices could fragment a community built around established quality assurance practices, two of which are considered in the next section.

6.2.3.3 External examining

Participants generally saw both the advantages and disadvantages of each of the new OfS requirements, but the lack of a mandate on external examining, a key element of the quality assurance principle of externality, was 'one big worry' (UA2) where all were agreed that there was too much latitude:

They're not saying that you've got to have all these processes in place, it's outcomes that matter and you can do that differently, which I now appreciate, except I do think they potentially are going too far, saying you don't have to have external examiners, which appals me… I think it's almost built into quality personnel; you want to benchmark yourself against other institutions so that you don't feel that you're out of line or somebody else has got really good ideas and practice that might be applicable to you. (GHE1)

Participants were mindful that the development and review of internal quality processes were contingent on the advice and requirements of external quality assurance systems (Dano and Stensaker, 2007). Most claimed they would retain external examiners, and external advisors in programme approval, but all were aware of the potential pressure to drop a process that was no longer mandatory:

I suspect at CGInst1 we won't drop examiners, but I suspect that at some other institutions they may well say: 'Why are we paying all this money? We could do something else with it.' (CG1)

The effects of marketisation were again evident in participants' expectations of change, however there was also an awareness that the motives for dropping external examining may not be as straightforward as saving money, but as a result of interactions with other carriers of practice over time:

If, as part of discussions with colleagues in other institutions, there was a general sense of everybody moving in this direction and the reasons are valid. (GHE1)

GHE1's observation about the future of external examining highlighted the interconnected causality of change over time (Blue and Spurling, 2017), with implications for the role of the QP. There was full agreement about the value of external examining, but also the potential for a division within the community of practice, based on the relative value accorded to specific quality assurance activities by different practitioners within increasingly diverse institutions.

6.2.3.4 Enhancement

Responses to the concept of enhancement, also excised as an expectation from the Quality Code, were complex and connected to participants' beliefs about the meaning of quality and the purpose of quality assurance. As one participant commented:

> We should be giving value for money; we should make sure that when students start a course that they complete it and get a good job at the end or go on to further study. Nobody could argue with that...it's criminal to take a student onto a course and not give them a good experience…we have to have integrity. All institutions are going to face the fact that, unless they're in the top quartile of the data set…and at risk of not attracting funding…they'll have to take some harsh measures. (NA1)

The emphasis on quality as 'value for money' (Harvey and Green, 1993), the need to provide a good experience, and the consequences of metricised accountability encapsulated the challenge of the quality assurance task, indicating a shift in the traditional balance between enhancement and accountability (ENQA, 2015), as a result of the transition to an outcomes-based quality assurance system.

In a complex set of responses indicating significant variations within the community, one private provider participant claimed that enhancement was incentivised, rather than replaced, by 'the OfS's regulations and from competition between institutions' (PP2). However, for the majority of participants, the neoliberal narrative underpinning the policy change was ill-equipped to improve teaching and learning (O'Leary and Cui, 2020) and was met with both resistance and the ongoing indifference in higher education to a consumerist approach identified by Harvey and Williams (2015). Many believed that quality enhancement activity in universities would continue 'because I think they would want to do it anyway…Why we wouldn't we want to make things as good as they can be?' (CG1). The concept of enhancement was seen by most

as intrinsic to an established higher education quality culture and endemic to the quality assurance role, and therefore difficult to relinquish.

There was however a concern shared with (Hunt et al, 2016) that new entrants driven by the profit motive would have neither the capacity nor the proclivity for quality enhancement activities:

> I just think newer institutions, and maybe I'm being a bit harsh, but institutions that are in it for the money, if you like…they're just going to be driven by the numbers; they're not going to want to go above and beyond what is absolutely necessary for the OfS. (PP4)

The effects of the numbers and the minimum requirements of the OfS on the concept of enhancement highlighted the potential for further divisions within the community, and the priorities and roles of participants in adapting to the emphasis on data and accountability in quality assurance.

6.2.3.5 Metricised accountability

The emphasis on data, often used synonymously with 'metrics', was cited by all participants as the main consequence of the OfS becoming the sector's regulator and moving to an outcomes-focused approach. The diverse range of opinions on the use of data in the sector revealed the complexity of the issue which centred around what data was being used, how much, how it was being measured and for what purpose.

All participants saw the advantages of making more and better use of data (Gunn, 2018) and the majority claimed to have been doing so before it was mandated by the OfS:

> One of the things they wanted me to do when I came to RGInst4 was to shift our annual and periodic review processes to take account more explicitly of data for employability, student satisfaction - particularly diversity data around BAME students, what they were achieving and their satisfaction data - and scrutinise that data, on an annual and periodic basis, by department. So when HERA comes around, we'd

already made the decision to move in that direction, unlike the generation before, where the data wasn't available or hadn't been tested to the point of reliability. (RG4)

Again, the shift was seen to be partly due to an evolution of quality assurance practice within an autonomous, co-regulated sector, supported by the availability of more reliable national data, and partly in anticipation of HERA.

No reservations were expressed about quality assurance being data informed, particularly in respect of the benefits of being able to demonstrate 'the connection between what we do and the impact on student outcomes both internally and externally' (RG2). However, most participants objected to its being data-led and wanted balance and 'measures based on values and principles' (GHE1) in assessing impact, rather than attempting to force KPIs onto 'recalcitrant reality' (Knight, 2002):

> The proposal for baseline metrics for quality and standards that the OfS have been consulting on and the focus on metrics, almost to the exclusion of everything else, is probably bit too far in the opposite direction. There's always a kind of context that goes around those numerical outcomes that is usually crucial to take into account. (RG2)

For all participants, accountability must be underpinned by appropriate measurements and the reliance on decontextualised metrics was widely criticised for disempowering quality practitioners and invalidating the discussion of educational values (Wrigley, 2019), showing that the connection between data and outcomes was 'more complex than some of the OfS proxies for measuring quality may allow' (PP3). However, a metrics-based culture of performativity required individual practitioners to organise themselves in response to targets and set aside personal values (Ball, 2003).

Some participants cited their geographical location as presenting diversity issues, and areas of social deprivation were problematic for retention and achievement. Participants who believed that higher education was increasingly about economic functionality rather than the realisation of human potential

(McArthur, 2011) were concerned that, however valuable the on-course experience, student drop-out would be deemed as failure, even though young people 'should be allowed the chance to try' (PP3). This assumption would result in the defunding and reduction of provision which may still serve a useful social purpose, or the raising of barriers to entry, thereby militating against the widening participation agenda enshrined in several institutional mission statements and contrary to BIS objectives (Fielden and Middlehurst, HEPI, 2017)**.**

Graduate employment proved similarly problematic, with another participant from a specialist institution commenting that it was more difficult to measure in certain disciplines. For example, the progression of Creative Industries students could not be measured in the same way as for those for whom a career pathway may be 'more conventional, such as in Engineering' (GHE2). With regard to the emphasis on graduate employment, another referred to the overly-simplistic approach to data and the potential consequences for the curriculum:

> What becomes more difficult is when there's a much more transactional relationship, particularly when it comes to employment. Graduate outcomes and the way in which different subjects relate to it, is skewing the conceptualisation of courses and the way people teach, certainly in the Creative Arts, for example. Course teams are putting new things into courses, about creating professionals in their subjects, about different aspects of getting a job, which are all are important, but maybe need wider consideration. (UA1)

An emphasis in the curriculum on employability skills designed to meet external targets involves changes to both teaching and learning and quality assurance practices. These changes have implications for the roles of academics and QPs and are likely to involve the renegotiation of professional boundaries (Whitchurch, 2008).

Smaller providers, for whom size was an important aspect of context, felt particularly vulnerable to the 'tyranny of numbers' (Ball, 2003). Meeting the

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initial Conditions for Registration required the production of substantial documents (doc PP4; doc NA1) and most found the increased demands for data burdensome, recalling Prinsloo's (2017) analogy of escaping one 'monster' only to be confronted by another:

> There was a big change to the Access and Participation Plan requirements and a huge amount of data was produced quite late in the timescale for us to produce our proposed plans for the period 2020-2025. For a small institution like us, that was the devil's own job. We had our own detailed data, but trying to triangulate it with the data that came out from the OfS was just a bloody nightmare. (GHE2)

Additionally, smaller providers were more likely to be impacted negatively by a data-led approach, as small numbers could produce disproportionate effects, causing the outcomes to become 'challenging, because of the swings in that data' (PP1).

In line with Bell and Brooks (2017) and Thiel (2019), most participants were critical of the lack of subtlety in the instruments for measuring quality and the inappropriate focus they generated, the NSS being one example:

> I know in my institution that it's of great concern when there's any drop in NSS scores. And the question then isn't always what can we do about quality assurance, or what can we do about enhancement, it's how can we address scores that are in the lower quartile of the NSS. (NN2)

Some acknowledged that market forces drove a contractual obligation with students which may lead to 'spoon-feeding' (GHE1) and a lowering of standards, particularly if the learner's immediate satisfaction and final grade outcome took precedence over intellectual development engendered through challenge (Nixon et al, 2018). Addressing the scores, rather than what underpins them, may appease students, but not improve their experience, ensure success in the workplace, or serve the integrity of the system.

In defence of the NSS, one participant was keen to dispel misconceptions about the instrument itself, before explaining how it can be made meaningful as the basis for reflecting on practices:

> The NSS is not asking: 'Were you happy with your grade? Were you entertained in the classroom?' Those are often the criticisms that are made of it, but those are not the questions that are asked. The students are asked more pointed questions about their experience. 'Did the teaching stimulate you intellectually?'; 'Did you have opportunities to collaborate in the classroom?'; 'Did you feel part of the community?' Those are the questions that students are asked about their experience. They're perfectly appropriate and I think it's really important that we hear what they've got to say and reflect on them. It doesn't always mean they're right. We might have a robust response to say: 'We deliver our education in this way because…', but we should hold ourselves to account for it. (RG4)

Measurements needed to be understood, then used in the right way, in this case to underpin accountability. The TEF, regarded as another imperfect instrument of reductive neo-liberalism by O'Leary and Cui (2020) was also 'used very positively to have discussions with departments about what made that thing outstanding' (RG1), showing that data can lead to the enhancement of provision by 'asking the right questions' (GHE1).

The focus on diversity and the underachievement of BAME students under the OfS was raised by several participants as an example of how data could be used constructively to identify issues and enhance the experience of specific groups of students:

> You talk to a mathematician about the students who run a campaign about the maths curriculum being 'too white'. Nobody will argue with that. If we speak to mathematicians, they'll say, 'Okay, I really want to do something, but I honestly don't know the answer because I've studied what I've studied and I don't know how to change the curriculum'. (RG4)

As RG4 concluded: 'the real challenge for staff' is: What do I do? It isn't always clear to them'. Accepting data-based accountability enabled a deeper and more productive discussion. In this case it provided the evidential basis for a collaborative partnership between QPs and academics in addressing the issue and improving the experience of BAME students.

Using the right measurements, using the measurements in the right way and asking the right questions (Gunn, 2018) emerged as the principal criteria for the effective application of data to quality monitoring. Participants did not believe that the right balance had been found under the OfS in any of these areas. There were concerns relating to personal values, the integrity of their roles and their principal purpose as QPs in a system which has commodified higher education and monetised the student experience (Pucciarelli and Kaplan, 2016). However, many believed that the old system of cyclical review would have benefitted from a more differentiated approach to measuring the quality of provision and assessing its impact, and that they were on the right trajectory

6.2.4 Summary

Participants' responses on the effects of marketisation revealed variations of opinion about the purpose of higher education, the meaning of quality and the measures of success, with opinions crossing the boundaries of the institution's public/for profit origins. For many, competition presented a challenge to personal beliefs and values. They overwhelmingly regretted the passing of the enhancement-oriented peer approach to quality assurance symbolised by QAA and have not reacted favourably to the OfS, the re-structured regulatory relationship and the changed discourse within the sector. However, the revised Quality Code has been interpreted by some as flexible and an opportunity to do things differently. Participants recognised in these differences the changing dynamic of the community of practice, although the speculative threat to collaboration and the integrity of the community had not yet materialised.

6.3 Changes to quality practices

This section analyses the data gathered in addressing the second RQ, the specific changes that QPs introduced to their institutions as a consequence of the shift from a process to an outcomes-based quality assurance regulatory system. It discusses the extent to which participants felt that change was desirable, the extent to which practices had changed and whether the changes were perceived to be a direct consequence of HERA. Two principal changes to practices were identified: in response to the end of cyclical peer review and the increased emphasis on data and metrics. One notable effect was the emergence of a dual system of quality assurance in several institutions.

6.3.1 Extent of change and duality of systems

Most participants felt that some change was necessary. Only one said that there had been no change; the institution 'had not begun to address the Conditions of Registration' (RG3), a failure attributed to the weak quality culture, which RG3 had been appointed to address, and the perceived political power of the institution.

A small number of participants claimed that they had made no changes in response to HERA, but then realised 'I've probably identified quite a few after I said that' (PP5). This response was partly attributed to the time elapsed, but the main reasons given were that the changes had been made prior to, or regardless of, HERA or the OfS, and as part of the institution's own capacity for reflection and self-development (Harvey, 2006b). 14 participants indicated that they had made changes in line with HERA expectations ahead of its publication, because the political discourse around higher education had been proceeding in that direction, hence there was an awareness within the quality assurance community of what was 'coming down the line.' (RG2). Furthermore, other external imperatives had proved equally significant in prompting change, principally Covid, or in three cases, recent or existing applications for DAPs. (PP2, PP3, PP4), all providing examples of the interrelationship of bundles of social practices. (Schatzki, 2017).

Some participants who claimed that they had made no changes in response to HERA also commented that they had taken decisions to 'act as a bit of a buffer'

(CG1) or 'protect staff' (PP3) from doing what they considered to be 'dumb things' (RG4) requested by the OfS:

> I can't engage them in a serious discussion about how they measure spelling and grammar. For the sake of my own credibility, I'm absorbing the request and coping with it by working with the core team and the organisation to give a response to the OfS which is credible, reliable and doesn't bother our academics, who'd be furious with me for wasting their time. (RG4)

Protecting academic staff from untenable requests had effected change, but in RG4's own behaviour and that of his team, creating a dichotomy in quality assurance practice internally. This perceived gap between policy and practice recalled criticism of the previous quality assurance regime (Newton, 2013, Jarvis, 2014) and highlighted the dual role of policy actors on the implementation staircase in receiving and relaying policy (Reynolds and Sanders, 1987). The situatedness of the participant's relationship to policy (Saunders et al 2015) was therefore critical, through the allied process of gatekeeping (Shoemaker and Riccio, 2016), in determining which aspects of policy were withheld and which transmitted to academic staff.

In a variation on the concept of duality, some participants acknowledged change as a straightforward response to OfS requirements (MP2), but in addition to existing processes and principles derived from the Quality Code, such as external examining. Four participants (PP3, GHE1, MP2, UA1) commented specifically on the importance of basing processes 'on principles and values, rather than rules' (PP3). What problematised this approach was the mismatch between individual values and external directives, when policy was 'struggled over' (Ball, 1994) in the local context:

> Outwardly, we have a compliance-based approach, but on the inside, we try to maintain the same system of quality assurance…what you have to do to satisfy the OfS and then whatever we do internally to satisfy ourselves, if it's the right thing in terms of quality and standards. So it's

almost become a dual system of regulation. It can't be helpful to anybody. (PP3)

In acknowledging attempts to reconcile external and internal quality processes (Shah and Jarzabkowski, 2013), some participants noted that their institutions were fortunate enough to have the resources to retain some independence by absorbing those aspects of change they did not agree with, while being able to maintain their old systems:

> The positive thing about RGInst1 and the luxury of being in a Russell Group institution, is that there's still an ethos that quality assurance is fine, but it's not an end in itself… the privilege of being within the Russell Group and having the research income and protection to some extent from the OfS…means we can still operate those systems in England. (RG1)

For some larger institutions with international connections, there was an imperative to maintain systems which kept them in line with ENQA requirements. Smaller, less well-resourced and well-established institutions with no choice but to comply with the OfS, found themselves 'overwhelmed by the demands' (GHE2) of attempting to run a dual system of regulation.

Evidence of this dual approach can be seen in more detail in the following sections, which examine the two principal changes under HERA that have impacted on organisational processes, structures, systems, staff and skills. From a social practice perspective, these are considered in terms of materials and competences (Shove and Pantzar, 2005) and the implications for the meaning of quality assurance produced within the institutions.

6.3.2 The end of cyclical peer review

Two principal effects of the ending of cyclical peer review were noted: reports to governors and a revised annual monitoring process, both of which involved participants in changing internal processes and developing new documentation.

6.3.2.1 Reports to governors

While acknowledging (6.2.3.1) that the process of cyclical review was burdensome, participants also noted that its absence had placed a different kind of burden on governance:

> There's a bit of regret now that we aren't having it…because I'm not certain that governing bodies of individual institutions have grasped the extent of their authority and responsibility now for quality assurance. (RG1)

All participants expressed some degree of concern about governors' awareness of their new responsibilities under HERA (Maassen and Stensaker, 2019) and commented on the need to introduce, or upgrade, reports to governors:

> The only thing that I've developed as a direct response to HERA and its requirements is an assurance report that goes to the Board, to each of its meetings that accumulates over a year and allows them each December to sign off on their responsibility in terms of understanding the standards issues. (UA1)

Whereas governors could formerly rely on an external review report to confirm that the institution met the Expectations of the Quality Code, they now had to seek other evidence and the responsibility for supplying those materials fell to the QPs.

6.3.2.2 Revised annual monitoring

For all institutions, the internal periodic review process, described as 'unwieldy' and 'designed to meet the requirements of QAA cyclical review' (RG1), had been replaced by an enhanced annual monitoring process. For all participants this was seen to be one of the major benefits of the change from a process to an outcomes-focused approach, removing some of the constraints on innovation identified by Craft (2018):

> With QAA, I don't know that I would've got away with stripping it back that far, because when you look at QAA's expectations on monitoring and review, it's much more difficult to say: 'Actually all you people who

are doing brilliantly, we're not going to bother asking you for anything. In some sense we've got a little bit more latitude with the OfS. (CG1)

Participants welcomed the opportunity to adopt a risk-based approach internally and concentrate resources on supporting those areas that needed it. The question of burden on academic staff (Newton, 2000) was then felt to be one of re-distribution rather than reduction:

> They would probably say they don't think the quality assurance burden has lightened and we would say it has, without leaving it all so that it's got an atomic mass of Pluto. We're trying to resolve it when it's first recognised, but for them I suspect that it feels like death by a thousand cuts rather than a punch to the solar plexus…I guess some colleagues would say it's never ending. We've gone from knowing that we've got a process every year or every five years to thinking 'Are you ever going to stop asking me bloody questions?' (RG1)

The main advantage of an ongoing process was that the questions QPs were able to ask were more timely:

> You'll get NSS results in July, and you'll get graduate outcomes later in the year, and then you'll get progression and retention statistics at another point, so you're having the discussion at the opportune time, rather than waiting for the big bang. (RG1)

The changes introduced have given participants a renewed opportunity to engage academic staff in the process by making it more meaningful. Annual monitoring has, in most cases, been transformed into an ongoing, risk-based process using data at a more granular level, thus refuting Blanco-Ramirez and Berger's (2014) claim that this fine-grained approach would be marginalised:

> We have an enhanced programme review process. We have a set of academic KPIs that determine whether a programme should be in active monitoring and therefore be very much on the radar of senior management to support and put an action plan in place. (MP2)

Being able to provide support to staff when and where it was needed was the recurrent advantage of a more focused approach to programme monitoring.

Participants had also attempted to reduce the burden on staff by changing the requirements for producing monitoring reports. Commenting on the effectiveness of quality processes had required a narrative approach; commenting on outcomes required a shift to interpreting numerical data:

> We're at the start of that journey of using data and that's another culture shift for us that's proving a bit challenging with some colleagues because the narrative approach that we've used previously meant that people could say, well, whatever they liked. That's not to say that they were making things up, but we didn't have any sort of evidence to back up that approach to quality assurance. (CG2)

The previous routinised approach had encouraged formulaic 'cut and paste' (NN2) responses which had become a meaningless replication of the 'performance' (Harvey, 2002) and 'parroting' (Green, 2017) of external review. However, using data alone did not provide an immediate solution:

> They didn't need to write telephone books anymore; they could just fill in two sides of A4. I was aiming for a very short document based on metrics. And then we decided we did need them to do some evaluation and to include students' views and external examiners' views etc. (MP1)

The transition to using data in annual monitoring reports was one example of an evolving, iterative process where participants made use of artefacts to re-configure a social practice in an ongoing process of re-contextualisation (Trowler, 2012). Participants were confronted with the issue identified by Harvey (1995), Houston, (2007) and Nasim et al (2020) that reliable performance data on student achievement is unattainable using performance indicators and outcomes because assessment is about judgement, not measurement (Knight, 2002). In finding the right balance between data analysis and narrative judgements, participants felt that they could ask questions which

required a more precise and thoughtful response from academic staff than previously:

> We provided more data as part of the annual review process and we identified areas that we want to improve, using data from the sector. For example, most recently we have focused as part of the annual review on awarding gaps and looking at the data that is available and asking the department to comment on any gaps. (NN2)

Within a more balanced process, academic staff were prompted to reflect on what they did well, where they would like to improve, where they would want to share good practice, or how they might be delivering on wider strategic objectives around teaching or assessment. It was evident that, as part of the changes, participants were attempting to engage staff more closely in the quality monitoring process by identifying specific issues and providing targeted support, thus retaining the valued practice of self-assessment (Harvey, 2006b). It was also evident from the small sample of documents submitted, that the concept of enhancement had survived and remained a requirement of the monitoring and review process (doc PP4; doc NN1).

The changes ensuing from the ending of cyclical review were generally presented as modifications to existing reporting and monitoring systems. They illustrated how data could be used as part of an enhanced monitoring process, but to produce reports for governors or develop continuous monitoring, data systems also had to be improved.

6.3.3 Data and metrics

All participants cited changes that had been made to improve their institutions' data capability. Most claimed that the developments were part of an ongoing process initiated before HERA and that they had needed only adjustments to supply the data required by the OfS. Participants recognised the importance of having robust data because, at an operational level, 'academics spend their lives challenging and questioning the quality and value of data' (RG4) and because the majority saw the potential to make more effective use of 'big data'

as part of the future of universities benefitting from combined technologies (Williamson, 2018). In this endeavour, developments to systems, structures, people and their competences had been undertaken.

6.3.3.1 Systems

All systems were at different stages of development and application, but regardless of the original impetus, some of the developments which had taken place were extensive:

> Data used to be a cottage industry; it was a couple of people in a Registry department keeping it on spreadsheet and now we're in the midst of doing a complete reimplementation of our student records system. (PP2)

Many institutions had made a considerable investment in new data systems and 'data warehousing' (UA2) to develop smarter, more connected environments (Williamson, 2018) in support of the continuous and enhanced monitoring processes. Business information systems have made the data more accessible to academic staff and introduced a new business-orientated discourse, reflecting the changing nature of quality assurance practices:

> It's all on the dashboard at MPINST1 and they can download the data in a number of different formats. It's either in tabular or chart form and the benchmarks are shown by different coloured lines on the graph or chart. The numbers colour up green or red, according to whether or not they've reached the benchmark. (MP1)

As a consequence of increased data capability, participants were able to analyse individual student performance, identify issues and provide support to an extent which was not possible before, by plugging in to the expanding technological architecture of the university (Williamson, 2018). For some, this has proved revelatory, adding a new dynamism to quality assurance:

> Some of it's been quite a surprise when you drill down to see what the issues are, but you are addressing it rather than just living with it and

thinking 'Oh well, the students didn't do the work'; 'Why aren't students handing in on time?'. Going back a few years, it was seen as the students' responsibility to hand work in on time and they did the study and revision, and if they didn't, that was their fault, whereas now we've got more processes in place to support them. We've got progression assistants who follow up if a student misses X number of classes; we've got people who follow up if they don't submit, we've got people who follow up if they don't complete re-assessment. It's much more hands-on. (NA1)

Although varying between institutions, the type and level of support denoted a significant change in the relationship with students and a shift in practices, requiring a different blend of people and technology (Komlenovic and Robertson, 2016). These changes needed to be supported by appropriate staff competences in the form of new people, skills and structures.

6.3.3.2 Structures, People and Competences

When participants referred to HERA and OfS-related changes to institutional restructuring, recruitment or staff development, it was principally in connection with expanding data capability and data management (doc PP4) and the associated monitoring responsibilities, for example in student attendance and progression, as detailed by NA1 (6.3.3.1). Each of these interrelated changes reinscribed the boundaries between roles traditionally associated with quality assurance or teaching and learning (Whitchurch, 2008b).

In addition to new posts to support student performance, new posts have been created to support staff at different levels of the institution:

> We've got very strong engagement with providing data and asking people to comment on data…and I think that comes back to new roles created as part of the restructure. We had new directors of education for each school, who have a real interest in data and it also helps when you have people who are academics, who are engaged and are able to engage colleagues as a result. (NN2)

The new appointments brought academic credibility with them in engaging other academic staff and were examples of the blending of previously clearly bounded roles (Whitchurch, 2004). How far this engagement went varied considerably across institutions.

> I don't want academic staff to worry about the TEF data. I want them to design good courses and teach them well. I'll worry about the TEF data, and I'll tell them when it's going wrong. I absolutely make clear to everybody that they should be concerned about student success, student engagement and students' progression into work, but they don't necessarily need to know why, beyond that. (UA1)

In contrast to this protective approach and in addition to employing people with different combinations of skills, the majority of institutions have used staff development to train existing academic staff in understanding the data. Given its accessibility and reliability, there was little concern about potential role stress (Bowling et al, 2015), with most participants believing that academic staff needed to develop data competence to facilitate the enhancement of provision.

Examples of enhancement derived from analysing the diversity data within one institution ranged from training staff in using different fonts to help disabled students read Powerpoint presentations (RG4), to addressing the curriculum content in response to discovering that it was 'too white' (RG4):

> We're funding some quite significant projects across the institution to change it and get different perspectives, giving people opportunities to go and study in different countries, to see how they teach these different disciplines and be able to develop. (RG4)

In this case, the benefits of targeted data analysis were demonstrable and the outcomes highly significant. Smaller institutions may not however have access to 'the bloody resources' (RG1) to support such developmental activity on the scale undertaken by some Russell Group institutions, thereby exposing the need to maintain a facility for sharing good practice.

Staff development in respect of data capability was not directed solely at academic staff and most participants recognised that Quality staff also required additional and ongoing skills training to maintain professional credibility (Gorniztka and Larsen, 2004), as 'data analysis is a bigger part of my team's role than it was 10 years ago' (RG2). Another participant felt that a much broader range of knowledge and skills would be required by the Quality team as a consequence of the changes:

> This is going to be a massive change in culture for my team because to date, all they've done with, for example, programme approval, is manage a process. They didn't need to understand all the ins and outs of QAA, because it is so well embedded into our procedures. Because the OfS is all about the input and the output, they are going to have to know what these are and they're not necessarily things that I can write down for them; they need to fully understand what it is they're asking panels to do. (CG1)

Extending knowledge and skills on both sides showed how practices typically associated with teaching and learning and quality assurance were being recast into different and varied patterns, corresponding to an understanding of institutions as assemblages (Bacevic, 2018) of different functions, able to respond in more agile ways to changing circumstances.

The required agility was supported by structural changes of varying magnitude to improve communication (Elken et al, 2018), often within the smaller institutions. One participant referred to the setting up of a body to deal specifically with OfS requirements relating to the Regulatory Framework and Conditions of Registration, such as ensuring 'reportable events' are brought to the University's attention before being sent to the OfS (NA1). Additionally, restructuring took place at different levels to bring staff into closer proximity internally:

> We're restructuring to a Quality Management Office, because we're identifying a team that will work much more closely with the programme

teams where their data isn't likely to meet standards for the new metrics that will come out of the OfS. (NA1)

Another refers to a similar structural change, but at senior level:

> Four years ago, we introduced a college structure to the University. Each college has a director for learning, teaching and quality enhancement and a director for research and knowledge exchange, and those are senior level appointments. It made a huge difference; we really worked together as a team across those agendas and it's enabled much greater consistency than there was previously, but also it gives me a clear link through to the schools within the colleges. (GHE1)

This example of restructuring shared the aim of bringing the quality assurance function closer to academics. Participants were then in a position to support them, make the new processes more meaningful and grow competences by either developing the horizontal institutional relationships (Handy, 1993), or blending the functions of quality assurance and teaching and learning to create new institutional spaces (Whitchurch, 2008b).

Most participants were confident about the benefits so far accrued from staff recruitment and development, but for some smaller institutions, there were practical concerns about the detrimental effect of increased spending on data-compliance-related strategies taking priority over the capacity for enhancement. One of these concerns was the need for a more legalistic framework:

> We've definitely invested more money in legal advice and the whole legal compliance side and that has meant that we've had less money to spend than would have been available for quality enhancement. We wanted to run a teacher conference, but the budget is now being reduced to such an extent that we couldn't. Some of the work that we would like to do beyond annual monitoring isn't going to happen and that's really sad because it's about building the organisation. (PP3)

Although only raised in such detail by one participant, two others intimated that greater legal expertise may be required in future. If this happens, a shift in budgetary priorities may have the paradoxical effect of not only curtailing quality practices, but also deterring the expansion of smaller specialist providers into the sector that HERA was intended to encourage (Fielden and Middlehurst, 2017).

6.3.4 Summary

Changes to practices were not attributed solely to HERA, but to a combination of influences, including self-assessment. There were majority concerns about compliance and the appropriateness of the metrics, albeit with a variable institutional capacity for absorbing any negative impact on existing processes, including the operation of a dual system of quality assurance. Most accepted the need for more effective use of data and had responded favourably to the option for greater flexibility. Many had introduced an ongoing quality monitoring process, supported by new reporting documentation; structural change to bring quality personnel into a closer relationship with academic staff; and training for academic staff in the new data systems. The result has been the blurring of internal boundaries, the emergence of blended professionals and the creation of new institutional spaces. As each institution responded according to its own circumstances, there was potentially less to bind participants together as a quality assurance community and to share developing practices..

6.4 Enacting policy change

This section continues to address RQ2 by focusing more specifically on how the changes to practice identified in the previous section were enacted; how participants perceived academic staff responses to change, using Trowler's typology (1998); and how they categorised their own responses. In doing so it provides an insight into the extent to which participants were applying what may be described as constructivist approaches to policy and how evidence of these conceptual frameworks might be optimised in future policy making.

6.4.1 Approaches

Approaches to enacting changes to quality assurance practices varied depending on practicalities, such as the size and organisational structure of the institution, combined with the values of the participants and the culture of their institutions (Handy, 1993; Elken et al, 2018). As all participants were experienced senior managers, there were few revelations about policy enactment, but rather a reinforcement of existing knowledge and skills:

> I've had a number of these kind of episodes before - the NSS being a good example, where there's a process to introduce and explain, but where it may not be the perfect arrangement one would like, but still having to make it work on the ground with your team and your colleagues. They've been largely similar approaches: finding the positives, finding the wins and then trying to nativize the language and the aims, so that we can do what's required externally, but also that's in line with our own internal objectives. (NN1)

NN1 identified three important elements of policy enactment: highlighting the benefits, using the appropriate discursive repertoire (Trowler, 2005) and balancing external policy requirements with the values and culture of the institution, all routinised practices familiar to the 'policy literate' (NN1) QP community.

A number of participants commented on the importance of communication (Bendermacher et al, 2016) and consultation in enacting change, which included 'being frank about what we can't do as a result of that consultation' (RG1) and being 'willing to stop, and reflect, and perhaps actually rethink (NN2). References to HERA and the OfS were generally low key and more emphasis was placed on 'what the change means than why the change has come about' (GHE2). The extent to which academic staff were expected to accommodate the changes varied considerably. One small private provider described making an initial announcement then expecting 'business as usual' (PP1) as a straightforward, rational-purposive transactional arrangement. More commonly, and in line with SPT, participants recognised that the acceptance of change depended on multiple components and context-specific factors that

need to be considered and strategically arranged to render the policy workable (Savage, 2020), that this took time and effort (RG1, GHE1); and that making policies work was a hands-on, messy, and very much local affair (Trowler, 2002; Peck and Theodore, 2015).

To this end, the means of communicating change was multi-staged and conspicuously oral, offering the advantage of non-verbal and paralinguistic presentational techniques and immediate feedback (Argyle, 2007). Two institutions cited 'Town Hall meetings' with attendances of up to 500 staff, which invited 'robust debate' (RG4). Another required her team to eschew written documentation in favour of conversations with staff, as it was 'more engaging' (MP2). One participant described a 'socialising approach' (RG1) enabled by the institution's hub-and-spoke structure and underpinned by the principle of peer-ness:

> Everything at RGInst1 takes time. There's a concept of having to socialise a new approach, which means you have to go out to your colleagues and faculties in order to build a head of steam. When I first got there, I was thinking 'Oh my God, this is ridiculously time consuming' and now it's one of the things I like best about it; the fact that you have to test things out. And you have to take all the brickbats, and the slings and arrows on the way, because people were quite forceful in what they were concerned about. And it just meant you should be able to develop something which actually benefits the person. (RG1)

RG1's final point evidenced a more holistic understanding of the concept of quality and quality assurance as transformational (Harvey and Green, 1993; Lomas, 2002), which was shared by the majority of participants. 'Taking people with you' was also important for (MP1) and participants sought help in generating support for change from beyond their immediate quality teams. Recognising and making use of different subcultural attitudes to change (Martensson et al, 2014) was helpful for at least one participant faced with the intransigence of academic staff in other parts of the institution:

> When I want to make these changes, I will go and have a quiet word with the Medical School and say: 'You've got a strong quality culture, can you endorse my ideas at this committee next week?'. (RG3)

What was clear from these examples was that the need to mobilise support and the peer principle underpinned the majority of internal communicative action for participants. One participant, self-described as a 'constructivist', was acutely conscious of the 'discomfort and anger felt by people whose model of how things work has been disrupted' (PP3). Consistent with SPT, most participants recognised a resistance attributable to the tenacity of culture (Trowler, 2005) and microcultural traditions (Martensson et al, 2014) in a rapidly changing environment generated by national policy (Silver, 2003) and tailored their strategies for enacting that policy accordingly.

6.4.2 Responses of academic staff and QPs – Trowler's typology

Questions about academic staffs' responses to changes in quality assurance practices were framed using Trowler's (1998) four categories: 'swimming', 'coping', 'sinking' and 'reconstructing policy'. Participants were also asked to identify any other descriptors which might characterise staff behaviours and to describe their own.

Many participants said they would be able to 'give examples of all of these' (NA1) from within their institutions, but the majority claimed that staff were either 'coping' or 'swimming', positions largely made possible by the 'efforts of support staff' (NA1). At the extremes, academic staff from one established institution suggested that the participant should be arguing with the OfS against any kind of change, whereas another from a Business-oriented private provider claimed that staff just 'get on with it' (PP5), responses attributed to their different cultural expectations:

> That's not a derogatory term - that they tend to get on with it; they are engaged in what needs to be done and they're willing to change and develop new things. There's a lot of that going on. They're swimming and they're swimming pretty fast. (PP5)

This cultural difference and willingness to 'swim' was also observed in a care-oriented specialist private provider and attributed to the vocational commitment of staff and their 'emotional buy-in' to the ethos and values (Alvesson, 2013) of the institution.

Some participants from the larger public universities were able to identify differences in academics' responses between disciplines, again highlighting the existence and importance of microcultures (Martensson et al 2014):

> A lot of it is discipline dependent. You've got greatest compliance - those who just get on with it - in science and mathematical-based areas. Most of the challenges came from the non-numerical disciplines, particularly in social sciences and art, where you have to work a bit harder to get your colleagues on board. (RG1)

The only reference to 'sinking' was made in connection with staff in disciplines such as Medicine and Business, where OfS-related changes have come in addition to the extant demands of Professional Statutory Regulatory Bodies (PSRBs) and other external standards bodies, including Degree Apprenticeships (CG1).

The only new category, which was offered by two participants, was 'ignoring', a step further than Harvey and Newton's (2015) 'compliant indifference':

> Ignoring is the dangerous one in our place. We bring some new things in for whatever reason and, despite the fact that you think you're disseminating and you've told everybody, they just carry on doing what they used to do. (PP2)

It was however noted that this kind of response from academic staff was no longer viable. 'If they're not meeting our requirements in terms of data, or if their programmes aren't up to it' (NA1), their positions were becoming untenable.

All participants themselves claimed to be either 'swimming' or 'using coping strategies', largely reflecting their position in relation to policy, but also recognising that change was an inevitable part of the quality assurance role.

One noted that she had felt like 'sinking' initially but realised that the arrival of the OfS 'does open up the world in other ways' (CG1). The recognition of opportunity showed, in line with the typological concept, that positions were not fixed and also revealed a resilience which seemed to be endemic in the role, to the point where some participants said that they actively enjoyed 'the challenge of change' (GHE1) and trying to ensure that it worked for the institution (Grove, 2018). This attitude may be better interpreted as 'reconstructing policy':

> Going forward, I feel like I need to be in the reconstructing policy category, because of the amount of change that is coming down the line, and the need to remain flexible and keep the students and academics at the heart of what we do. (RG2)

'Reconstructing policy' appears to underpin much of what QPs did in determining what was appropriate for the institution and how to support staff to swim, or at least cope with change, by mitigating what they believed to be the negative effects of external policy on internal quality assurance processes, but the extent of these actions was resource dependent.

6.4.3 Summary

The findings showed a wide range of responses to effecting policy change. In some newer higher education providers with a more profit-orientated mission, participants were employing a more positivist rationale to implementing policy, reflective of a culture more accustomed to the vagaries of markets and rational-purposive approaches to the economic imperatives of change. The majority of participants however evinced a more constructivist mindset and were employing social practice approaches, consciously or unconsciously, to enact change in ways which were time consuming, iterative, and recognised the importance and embeddedness of multiple institutional cultures, thereby making it more likely that change would be transformational and enduring. Most believed that academic staff were responding positively and most appeared to be underestimating the extent to which they were actively and creatively reconstructing policy to align with their own and their institution's position in relation to the policy object.

6.5 Implications for the quality assurance of teaching and learning

This final section addresses RQ3, the implications of change. As several participants referred to changes 'coming down the line from the OfS' (NA1) which they felt would be even more significant, they were asked what they believed these changes would entail and how they would affect the future of quality assurance within the sector. Their views were speculative, bound up with how they positioned themselves in relation to the policy text (Fanghanel, 2007, 2008), and were expressed with varying degrees of pessimism and optimism.

All believed that the market would continue to be the principal driver for how higher education would develop (Pucciarelli and Kaplan, 2016) and their views on the future were therefore shaped by their views on how market forces had shaped their present. For one participant in the specialist Creative Industries institutions, the sector had regressed:

> I would say we've gone backwards. We've grown over many years a very collaborative and sector-owned approach to quality assurance, so it wasn't broken and, in my view, it is now…the system that HERA set up is one that doesn't align with my values, and that's problematic. (PP3)

Non-alignment with their personal beliefs and values left some participants in an ontologically difficult position. A similarly bleak view of the relatively short term was offered by a participant with a strong 'public good' standpoint from one of the larger institutions:

> My fear is that in five years there will be a review of who the quality body should be and you'll get somebody like KPMG coming in and then we really will have moved away from any sense of either peer review, or real understanding of higher education in the audit. (UA1)

The concern that higher education review may assume the characteristics of a financial audit echoed Kernohan (2019), in that the focus of quality is

externalised to the point where it is taken out of the classroom and the university altogether.

Those participants whose institutions could still afford to maintain processes that 'unite the worlds of accountability and enhancement' (RG1) in accordance with the ESG (ENQA, 2015), feared that enhancement processes would be abandoned in some less well-resourced institutions faced with other regulatory demands, because 'it will be easy for a very managerialist senior team to say we don't need to do that anymore' (RG1). Fears were also expressed in relation to the paradoxical effects of risk (Harvey, 2006b) on quality enhancement, as illustrated by the concept of 'productive failure' (CG1):

> It's the idea that you learn as much, if not more, from getting something wrong than just getting it right. I've had a lot of conversations with academic staff about how we can encourage students to take risks without them failing in a regulatory sense, but potentially failing in a kind of pedagogical sense, because when you look at work around entrepreneurship, for example, the best entrepreneurs are people that have got stuff really badly wrong. (CG1)

Whether changes to policy would encourage or inhibit risk and allow failure to enhance teaching and learning practices would become clearer as policy changes under HERA and the OfS are embedded and further external change happens, but such fears were sufficient to prompt pre-emptive action:

> We are consciously resilient and we try and build up mechanisms of resilience to ensure that we can buffer ourselves against the future. (UA1)

Experiencing the need to protect themselves against the future by developing mechanisms of resilience (Naidu, 2021) served as a reminder that the 'quality wars' (Watson, 2006) remained a reality for some participants.

In contrast, others maintained a more optimistic view that the new risk-based, data-informed regulatory regime offered the opportunity to re-imagine quality

assurance (Gunn, 2018), without losing sight of the student experience at its centre, citing:

> The value of thinking and starting with a blank piece of paper and going back to principles, rather than sticking to old systems which may not suit new situations. (MP2)

The emphasis here remained on internal enhancement, however the participant with the most extensive business background and market-oriented outlook took this favourable stance further in stating that the opportunities were not just internal, but that institutions should actively embrace business practices in developing their approaches to quality assurance:

> When it comes to quality assurance, we don't always look to other HE institutions to see what they're doing. There's lots of stuff out there around product development and quality assuring a product that isn't necessarily education. (PP5)

In this instance, there was a clear value alignment with the anticipated market-driven direction of higher education and the product-orientated approach to quality improvement advocated by Balzer (2020), although at variance with the majority view allied to Ball (2015), Harvey and Williams (2015) and O'Leary and Cui (2020), which maintained concerns about the principles of metricised accountability, the choices excluded by data dependency (Ozga, 2017), and the extent to which the value of higher education can be reducible to the economic returns it was claimed to generate (Tomlinson, 2018). PP5's comment did however hint at a future which envisaged HEIs as a blend of people, technology and programmes whose work aligned with, and would benefit from, the logics of the market (Komljenovic and Robertson, 2016).

Regardless of how participants positioned themselves in relation to external change and despite concerns about the direction of travel within the sector, there was an acceptance of, and readiness for change, recalling Trowler's (1998) assertion that 'adhering to the way we do things round here' need not imply stasis or resistance; in a culture such as quality assurance, where

development and change are part of the tradition, practice is not petrified but open to improvement. Many participants referred to the function of their role in forward planning:

> Change is always going to happen and that means that we constantly look inside, look outside, scan the horizon and try and adapt and be ready. (PP4)

Being reconciled to the inevitability of change and looking ahead were seen as intrinsic to the QP role and opened up a widening vista of challenges and opportunities. 'Looking outside' was not delimited to the higher education sector and potentially encompassed institutions and players beyond the existing community of practice to bring in, as proposed by Williamson (2018), new actors from across the public and private sectors to create a different kind of university for the future. Overshadowing such speculation, horizon scanning also meant monitoring developments around the future of regulatory bodies in England and their position in relation to ENQA (Beerkens, 2015), the latter being of special significance for those institutions with international connections and global standing within the higher education community.

6.5.1 Summary

Participants' responses exposed the increasing diversity of opinion regarding the future of higher education quality assurance and how the working out of the paradoxes of competition, choice and quality would continue to differentiate quality assurance practices. It showed how participants were variously poised and prepared to respond to the challenges of the next iteration of regulatory change from the OfS. In doing so, it provided further evidence of the potential for a disintegrated community of practice, or one which may be apt to reconfiguration, but in new and different ways.

6.6 Social Practice Theory

SPT (Reckwitz, 2002; Shove and Pantzar, 2005; Shove et al 2012); Trowler et al, 2012; Schatzki, 2017) offers an approach to change that is rooted in social

constructionism. It focuses on how changing the structures which underpin unproductive practices can result in the emergence of new practices, a process which may result in unpredictable outcomes that take time to resolve, but can optimise the use of limited resources (Shove, 2017) and effect systemic and long-term change in proscribed circumstances (Reckwitz, 2002; Shove and Pantzar, 2005; Trowler et al, 2012; Schatzki, 2017). This section reflects on the usefulness and relevance of SPT in exploring how the HERA is being enacted and the consequences for the quality assurance of higher education. It also explains, with the aid of a diagram, how SPT could be developed and used as a model for change in higher education quality assurance.

SPT allows for the integration of other theoretical perspectives which complement the ontologically constructivist standpoint and these were applied at various stages of the research. Whitchurch's (2008a, 2008b) concept of the third space and Lave and Wenger's (1991) community of practice were used extensively to explore the roles and identities of the participants; the policy implementation staircase (Reynolds and Saunders, 1987) and policy enactment (Sin, 2014) gave insight into the complexity of the process. In assessing participants' enactment of policy the notion of histories or sagas (Clark, 2017; Martensson et al, 2014) proved a particularly helpful way of conceptualising the responses of microcultures to change and advancing the iconic metaphor of QPs as 'cultural traffic wardens' (Alvesson, 2013). Some deceptively simple concepts also proved disproportionately effective, such as Trowler's typology (1998) which enabled participants to reflect on their own and academic staff's responses to change.

Using SPT as a theoretical framework maintained a focus on practice, rather than individual behaviours. In doing so, it enabled the uncovering of the structures which made quality assurance work: the quality assurance role; the reviewer role; the community of practice; the Quality Code; and QAA. It also allowed for the closer scrutiny of the routinised practices generated within those structures, such as data capture, annual monitoring and peer review. Taking the less frequently adopted meso level perspective (Trowler, 2005) encouraged consideration not only of policy enactment by QPs, but also of the linkages up

and down the implementation staircase, from the broad brush of national government policy at the macro level to the accumulation of detail at the micro level of members of academic staff requiring individual support. SPT also pointed to the interconnectedness of practice and how bundles of practices (Schatzki, 2017) impinged on each other, in the cross-cutting QP and QAA reviewer roles, and as a consequence of unforeseen circumstances, such as Covid, each creating complex patterns which are difficult to unravel and respond unpredictably when changes are made.

In a development of the theory, the model below offers a way of understanding the complexities of institutional practice change through the lens of SPT. It presents a diagrammatic representation of the mechanisms of policy enactment by bringing together those aspects of SPT which were foregrounded by QPs in describing their experiences of managing change:
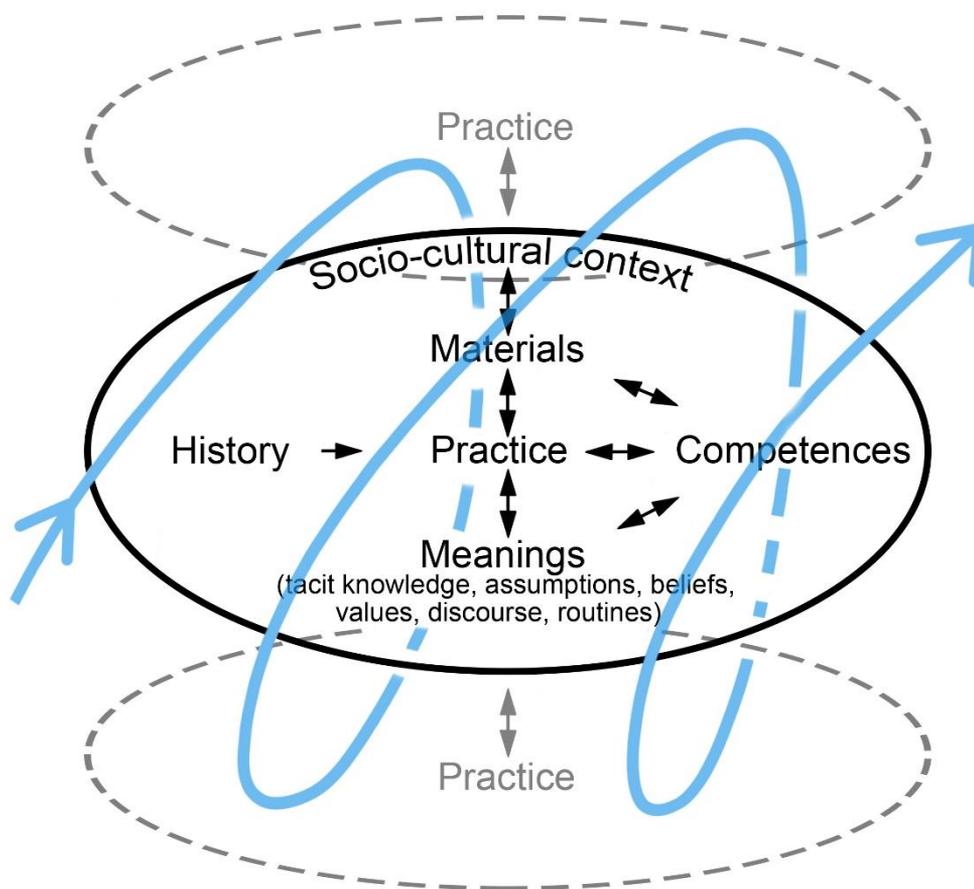

Figure 6.1: The mechanisms of policy enactment

The diagram illustrates the four-dimensionality of the mechanisms of policy enactment revealed during the research. Practice is informed by its history, occupies a socio-cultural domain (Wenger, in Farnsworth et al, 2016) and is composed of materials, competences and meanings (Shove and Pantzar, 2005). Meanings are informed by tacit knowledge, (Trowler, 1998), assumptions, beliefs and values (Alvesson, 2013), discourse (Lomer, 2017) and routines (Reckwitz, 2002). Changing practice impinges on other practices in the 'bundle' and the process proceeds recursively through time, as indicated by the helical structure,during which meanings are preferred through usage (de Saussure, 1983; Chandler, 2017) and concepts are adapted and changed through social reproduction (Alvesson, 2013).

Modelling can over-simplify and petrify a process, but it can also capture complexity and prompt debate (Mcquail and Windahl, 2015), for example in comparing Figure 6.1 with the linearity of the rational purposive approach or the two-dimensionality of the implementation staircase (Reynolds and Saunders, 1987). One area which it illuminated was the concept of the third space (Whitchurch, 2008a) which proved helpful in understanding the institutional positioning, identity and role of the QPs and their response to policy change. The diagram serves as a visual reminder that the 'space' is not a void and therefore amenable to being filled; it is already a highly-structured, occupied territory, giving it an inherent resistance to change and unpredictability of response when it meets the policy object (Sin, 2014), unless the willingness to change is itself embedded in the practice (Trowler, 1998).

The diagram is therefore presented primarily as an innovative way of theorising change which incorporates related concepts and as a schema through which to understand policy enactment. Open to modification and refinement, its secondary purpose is to be used as an adaptive framework for the practical application of theory to practice in higher education change management.

Chapter 7 Conclusions

The final chapter sets out the aims and scope of the study and addresses each of the research questions. It assesses the usefulness of the theoretical approaches adopted; the contribution to existing knowledge; the limitations of the study; and includes suggestions for further research.

7.1 Aim and scope

The aim of this empirical study was to discover how QPs in HEIs were responding to the HERA (2017). Described as the most significant change to higher education in 25 years (UUK, 2017), the HERA opened up higher education to the market and changed the regulatory system in England. The study sought to understand how policy change was affecting QPs' perceptions of their roles within the higher education sector, how they were enacting the changes, and the implications of changing practices for the quality assurance of teaching and learning, to which they are pivotal. A constructivist perspective was taken, adopting SPT as the theoretical framework and using complementary theories at different stages of the enquiry. A qualitative methodology using semi-structured interviews was employed to gain an in-depth insight into the lived experience of the 20 QPs purposively selected from the six self-styled mission groups and the private providers making up the sector. The outcomes were not intended to be generalisable to a wider population, but to contribute theoretically to an ongoing discussion about the direction of quality assurance at a critical juncture in higher education policy-making. This research, therefore, brings new knowledge to higher education governance and the enactment of quality assurance policy. It also has a practical application in offering QPs an opportunity to reflect on their own experience and compare approaches with practitioners in similar circumstances.

7.2 Research questions

The conclusions are set out under each of the original research questions. The first two sections begin with a summary of the key issues identified and

elaborated in Chapter 6, as a consequence of differing responses to the HERA, before drawing the main conclusions. The third section suggests how the effects of divergent practices on higher education quality assurance might be either exploited or mitigated in accordance with the internationally recognised standards of best practice in quality assurance.

7.2.1 How do QPs understand the quality assurance role within the changing higher education context? (RQ1)

QPs understanding of their role was grounded in a quality assurance system operating for 25 years, which had been shaped by QAA and the Quality Code and which was designed for public sector universities delivering a public good. This perception, as a third space professional (Whitchurch, 2004) located between academia and administration, was reinforced by membership of a well-established, supportive community of practice (Lave and Wenger, 1991) which reinforced meanings about quality and quality assurance.

The sea-change brought about by the advance of marketisation and metricised accountability under the HERA and the OfS presented a challenge to majority beliefs and values and generated different meanings about quality. Refracted within each institutional culture, the variations in emphasis on the widely accepted, multifaceted definitions encompassing enhancement and value for money (Harvey and Green, 1993; ENQA, 2015), have further inflections for the skills and competences attached to individual roles. Different configurations of the QP role will re-shape the third space and diminish the common ground upon which the community of practice is founded. A continuation of this trend signals significant consequences for the continuity of the QP role and the concept of quality at the heart of the system.

In a national system of public education which has relied on a common understanding of the concept of quality, it is not desirable to have widely differing meanings attached to this fundamental concept, or for those who are responsible for standards interpreting them in overly diverse ways. It is inevitable that differences in meanings will arise recursively (Shove and Pantzar, 2005), even in a collaborative enterprise, but initiatives benefit from

discussion and moderation, a purpose so far served informally by the community of practice, which has also provided guidance and the sharing of good practice for new entrants. Furthermore, it is not conducive to the wellbeing of a system if its practitioners feel undermined or isolated (Bowling et al, 2015) in what should be a common endeavour, particularly when it is as significant as the education of future generations and the foundation of the knowledge economy. Disunity weakens the sector and higher education needs a strong, coherent and collective voice as an effective counterpoint to national government (Beerkens, 2015).

7.2.2 How have quality assurance professionals interpreted and enacted the regulatory changes under HERA pertaining to quality assurance? (RQ2)

Previous research showed that the social reality within which participants operated has been continuously shaped by external policy (Harvey and Williams, 2015; Beerkens, 2015) and participants revealed themselves to have been highly and collectively responsive to the relevant higher education regulatory mechanisms over time.

Within a looser regulatory framework with tighter outcome controls, the wide range of responses in enacting policy signals a critical divergence in QPs' conceptualisation of the purpose of quality assurance and what the process should entail. Although most acknowledged the increased flexibility and evinced a growing appreciation for how 'big data' could be used for enhancement purposes (Williamson, 2018) and to drive quality in new ways (Gunn, 2018), many QPs were content with the HERA only insofar as they were able to find 'workarounds' (Trowler, 1998). Being unable to draw on the intrinsic benefits of change is not a healthy condition for the quality assurance of teaching and learning (Harvey and Newton 2007, Brady and Bates, 2016) nor its carriers of practices.

The changes to internal quality assurance practices, contingent on changes to the concept of quality, are anticipated to have multiple effects. Some, such as the content of the curriculum and how subjects are taught are already underway

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and will impact on the role of academics. Whether QPs are intending to protect them from change, or extend their roles by increasing their data capability, there are further implications for what it means to be an academic and their future relationship with QPs, with consequences for titles, professional identities, institutional structures and the re-inscription of the third space (Whitchurch, 2008a; 2008b).

These changes are significant for the individual institution, but when extrapolated to the sector as a whole, the effect is amplified. Differently applied quality assurance practices are a threat to common academic and quality standards nationally. Furthermore, a lack of comparability between quality assurance systems means reduced scope for learning across the sector and is compounded by the loss of a formal body, such as QAA, which could have shared or mediated new knowledge in quality assurance. Again, these potential outcomes have the capacity to weaken the higher education quality assurance system in England, both in respect of its ability to maintain standards which exceed the reductively numerical and encourage innovation, enhancement and socially oriented targets such as widening participation.

 A disjointed system cannot provide a common defence against the advance of a rational purposive approach to policy which, as the majority of QPs believe (Puccarelli and Kaplan,2016) is antithetical to the enhancement of higher education. The cumulative effect of these issues problematises the whole UK quality assurance system and has repercussions for the international reputation of UK higher education.

7.2.3 What are the implications of the changes for the quality assurance of teaching and learning? (RQ3)

As a consequence of the changes effected by the HERA, participants contemplated a range of potential directions for quality assurance, from the imposition of external auditors to an eventual working out of a more constructive interrelationship between higher education, the regulator and the market. It is evident that the quality assurance of higher education has hitherto thrived on collaboration and cooperation. The negative effects of competition

are however evident in the potential disunity among QPs deploying diverse practices and a fragmented or non-existent community of practice with no formal repository of knowledge, training or guidance. Not being able to share in a metastructure of tacit knowledge has implications at all levels of quality assurance, from individual practitioners to the HEIs and the UK higher education system as a whole.

The conclusions drawn in respect of the implications of change for the quality assurance of teaching and learning therefore centre on how the benefits emerging from the changes can be maximised and the negative effects of competition mitigated. This section focuses on the roles of QPs and their relationship with academic colleagues; their quality assurance community of practice; and their relationship with the OfS. It suggests how these principal actors might be brought together to negotiate the nature of change and how policy might be more effectively enacted in future.

7.2.3.1 The Quality Professionals

A key message from the study is that QPs are, as one participant aptly observed, 'policy-literate' individuals with a wide range of experience, extended by membership of an established community of practice and formerly supported by QAA as a forum for discussion, training and the sharing of good practice. As 'cultural traffic wardens' (Alvesson, 2013), QPs have been pivotal to determining and enacting change under HERA and benefits have accrued in many cases from internal restructuring to bring quality assurance and teaching and learning into the kind of interdependent relationship the terminology implies, but the reality sometimes fell short of.

Operating from a third space conferred a unique perspective on the institution, but required resilience (Duckworth, 2016; Grove, 2018) to both external and internal tensions. Although not seeking full alignment with the market as conceived by national government, the majority of QPs were endeavouring to bring people, big data, technologies and programmes together to create new spaces, as envisioned by Williamson (2018) and Komljenovic and Robertson

(2016), under a combination of influences and interlocking practice bundles (Schatzki, 2017), demonstrating that they were competent to do this work cooperatively and without external coercion. In responding to the OfS and academic staff, QPs have also provided exemplars of how change can be enacted sustainably, acknowledging that it is a messy, iterative process which takes time and requires support and an awareness of the multiplicity of institutional culture (Trowler, 2002; Peck and Theodore, 2015).

The evidence indicates that the QP role has the capacity to adapt to ongoing external change in accordance with its own history and culture (Clark, 2017) and that it can be instrumental in encouraging and supporting changes to the roles of academic staff. However, within providers who continue to espouse the fundamental principle of higher education as a public good, or have limited resources with which to reconcile metricised accountability with enhancement activity, the scope for QPs to reconstruct policy will be diminished. This complex situation is exacerbated for QPs by the lack of a relationship with the OfS and some rapprochement is necessary to retain the wealth of experience and resource within the quality assurance community of practice.

7.2.3.2 The quality assurance community of practice

Threats to the continued existence of the quality assurance community of practice are primarily located in the minority trend of the 'for-profit' providers towards the acceptance of market forces as the driver of quality and choice. QPs have identified the emergence of a different discourse, with a limited repertoire of quality practices focused solely on the metrics, which some suspect will undermine the accepted notion of quality and create a rift in the community. If other institutions who are no longer compelled to evidence enhancement activity adopt the same approach under financial or managerial pressure, the assumption is that the sector would be deprived of a collective voice and a key support mechanism.

A fragmentation of the community with factions working against each other need not however be the only outcome. An alternative scenario is grounded in those institutions where QPs have developed their data capacity and enabled a

shift from annual monitoring and periodic review to an ongoing monitoring process which was timely and led to the enhancement of the student experience. There is therefore much commonality in what many institutions are doing which could bind the community together and that others would benefit from. The community could continue to support newer, or less well-resourced institutions offering quality provision, but struggling with the demands of the transition to metricised accountability, by both sharing practices and nurturing the ability to adapt to change in accordance with the QP tradition (Martensson et al, 2014).

Additionally, if the QP community of practice can resist fragmentation and remain inclusive of new providers, those at the centre could also benefit from sharing the best of new or alternative practices currently at the periphery. Notwithstanding concerns that some institutions were motivated solely by profit, the findings showed that most QPs valued peer review based on a balance of accountability and enhancement. Furthermore, the overriding and unifying factor was that QPs were all bound by wanting to do their best for their students. If these attitudes and beliefs prevail and the domain remains intact, it is capable of reproducing a discourse and repertoire through which new quality assurance practices can emerge, which in turn can inform and enrich the dialogue with a more receptive regulator.

7.2.3.3 The OfS

The arrival of the OfS has problematised the concept of quality and the process by which higher education quality is assessed. The sector has taken issue with aspects of outcomes-based quality assurance and, moreover, the way in which change is being imposed. In the interests of the development and cohesion of the higher education sector and the wider socio-economic context which depends on it, the regulator needs to resolve the unproductive relationship with QPs and recognise the value of the quality assurance community of practice by adopting a more constructivist approach to the social reality of change.

The OfS is failing to capitalise on the invaluable resource of an innovative and resilient group at the meso level of higher education. The OfS should harness

the expertise and insight of QPs as 'carriers of practice' (Shove and Pantzar, 2005) by engaging them in a more equal and dynamic relationship which has the potential to bring quality assurance accountability and enhancement together in new and more creative ways. It could learn much from the QPs who are successfully enacting change with academic staff in many institutions by adopting social practice principles to modify the structures underpinning practice issues.

Firstly, the OfS needs to reconsider its discursive practices and open a dialogue with individual QPs, initially to understand their concerns, then acknowledge the progress made in many institutions to introduce and embed new practices. In doing so, it would re-validate the QP role and begin to repair the damage to morale. The OfS would also benefit from acknowledging the existence of a long-standing QP culture, bound by tacit knowledge (Trowler, 2005), mental routines of understanding and knowing and the use of objects (Reckwitz, 2002), which it risks alienating further, but which is predisposed towards change, if carried out with consultation and respect for its traditions (Clark, 2017), rather than imposed with threats and punishment.

Secondly, the OfS needs to recognise that change of this magnitude is more effectively achieved over time and with the appropriate support, differentiated for the increasingly diverse providers it wants to encourage into the sector. Continuing to treat all institutions as homogeneous risks losing the smaller, specialist and less well-resourced, thereby reducing the range of provision and richness of the institutional perspectives available.

Finally, rather than the dismantling of the structures which underpin lasting change, the OfS should retain a formal peer forum, such as QAA, to promote a shared discourse and continue to add to the valuable repository of good quality assurance practice already accumulated by QAA's peer reviewers. It should also recognise the benefit of having an extant informal community of practice by capitalising on its capacity to solve problems and share solutions collaboratively to co-construct knowledge about quality assurance, as QPs have done with academic staff. By re-drawing the boundaries between the OfS and QP

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communities of practice, both would benefit from peripheral learning (Lave and Wenger, 1991) and avert the unproductive collision between rational purposive and socially constructivist approaches to change.

Full engagement of the relevant actors would enable the generation of new materials and competences from which new meanings about quality assurance may emerge, within a social practice framework for securing longer-term systemic change (Shove and Pantzar, 2005) in higher education. This framework offers the opportunity for collaboration on the contentious and potentially damaging issues that have emerged under the HERA: the balance between accountability and the enhancement of teaching and learning; the dislocation of the English system from the ESG and the impact on the global standing of institutions with international partnerships; and the potential to mobilise social capital in the generation of a market which valorises the social as well as the economic benefit of higher education to inform government policy.

7.3 Theoretical approach

This section reflects on the appropriateness of the theoretical framework applied to the research questions, its wider application and its capacity for development.

As intended, employing a qualitative methodology for this study enabled me to gain an in-depth insight into the lived experience of individual QPs and SPT to achieve a unique and valuable focus on their practices. My research design has benefitted from the flexibility of SPT in providing a governing principle for the collection and analysis of data and has been successfully combined with related concepts such as the third space and communities of practice to establish a coherent theoretical position and widen the lens or deepen the field of vision as required at various stages of the research process.

I have been able to demonstrate that SPT can be applied to the practice of quality assurance, thus extending its range into another area of social interaction and contributing to an understanding of the relatively unexplored role

of the QP (Tight 2012). In conjunction with the concept of communities of practice, SPT also proved applicable to a hybrid community which was physically dispersed, but held together virtually by a shared domain, discourse and repertoire. Conducting the research also enabled me to extend the chosen theory into a model distilling the principal mechanisms of policy enactment (Figure 6.1), which also has a practical application as a basis for change in higher education. Generating new theory from SPT as a consequence of analysing specific social practices therefore provided an apt demonstration of how meanings are constituted and reconstituted through usage in an ongoing process of change, thus verifying and authenticating its own constructivist epistemology.

As a framework for change in higher education, SPT has offered perspicacity in understanding existing, routinised practices and how policy change can be made to work more effectively. In contrast to the rational-purpose approach to policy implementation, it acknowledges that the change process is unpredictable and takes time when enacted locally, but is more likely to be accepted and become embedded when conducted collaboratively at different levels of the institution.

At the micro level there is a focus on understanding how cultures work and providing appropriate support for change, which encourages social learning across internal boundaries and disciplines to reconstruct physical and psychological workspaces for staff. At the meso-level, SPT encourages a reflexive approach to policy and provides a flexible framework for the enactment of change, which benefits from external and internal networking. It enables institutions to interpret policy contextually and, rather than addressing single issues, encourages an examination of the interlocking practice bundles that make up the phenomenon. SPT invites and rewards the deconstruction of practices, as illustrated by the creation of my own model for enacting change. Using the tools for deconstructing, analysing and reconstructing practices in terms of their elements (Shove and Pantzar, 2005), key carriers of practice (ibid) are able to identify the materials and competences required and to conduct appropriate interventions. In generating new meanings, SPT can help

to reduce tensions, reconcile various interpretations of the phenomenon and gain acceptance for new and emergent practices.

By capitalising on this dynamic framework, the principal actors can harness the available expertise collaboratively to meet the challenge of change and inform policy-making at the macro level of national government. From within this structure they can co-construct knowledge and re-imagine future phenomena, leading to creative solutions and the uptake of new practices to deliver systemic and transformative change within higher education.

7.4 Contribution to knowledge

The contribution to knowledge made by this study is fourfold. Firstly, it addresses three research questions which were important at the inception of the study, but which have increased in relevance as further and potentially more significant change to higher education governance is imminent. Secondly, the questions are answered by a group whose voice is rarely heard in proportion to its importance within the institution and the higher education sector as a whole. These findings bring to life experiences which are vividly recounted, providing a timely and valuable insight into how QPs are thinking about and responding to the HERA and highlighting their capacity for change. It is a pivotal voice informed by diverse backgrounds and wide-ranging experience, which merits closer and more regular attention. Thirdly, in applying SPT to the study of quality assurance practices it extends the usefulness and relevance of the theory into another area of higher education and one which is characterised by the dispersed nature of its third space community of practitioners. Finally, the study has developed the theory by identifying the key mechanisms of policy enactment and reconstruction at the meso level of the institution which underpin the relationships between the principal actors. In doing so, it provides practitioners, HEIs, the OfS and policy-makers with the empirical basis upon which to construct a better framework for thinking about policy design and enactment in higher education.

To complete the research process and instantiate its contribution to knowledge, the key messages need to be communicated appropriately to the relevant

audiences. This will involve selecting appropriate publications, then editing and re-presenting the text in the appropriate register and format. Suitable target publications include specialist journals, for example *Quality in Higher Education,* AUA's *Perspectives* on management practice, and platforms for policy debate, such as *Wonkhe.*

7.5 Limitations of study

The qualitative approach and methodology allowed the research questions to be met as intended, but are associated with well-documented limitations when compared to quantitative methods (Bryman, 2016; Silverman, 2017). The measures taken to maintain a reflective stance have provided an adequate counterbalance (Bryman, 2016), keeping memos alongside the collection and collation of interview data; constantly comparing findings during analysis; and maintaining an iterative review process to ensure credibility, transferability, dependability and confirmability (Bryman, 2016). Certain theories tend to prefer certain perspectives (Trowler, 2016b) and allow a problem to be investigated in a particular way. Using SPT to focus on practices rather than behaviours was in keeping with the aims of the enquiry, which was to examine specific changes and understand the experience of QPs in enacting change in depth. As qualitative studies prefer depth to breadth, the number of participants was necessarily constrained. However, the increasing diversity of the sector makes representative sampling more problematic, which is why continued light needs to be directed on quality assurance-related issues in higher education.

7.6 Further research

Further research would be valuable in relation to certain specified contexts and roles. Given the ongoing developments in the roles of QAA and the OfS in the regulation of higher education at the time of writing, further research into the continuing effects of HERA-instigated change on the sector in England is essential, particularly among former private providers, as smaller and potentially more vulnerable institutions. Research into the attitudes of QPs in other European countries towards the changes in the English system would be instructive, as would a study into how the HERA has been received in further

education institutions where higher education is delivered. QPs in these institutions have contended with metricised accountability under Ofsted's inspectorial system for much longer and comparing quality assurance strategies would be illuminating.

Appendix 1 Interview questions

Preamble

- Read information and happy with recording and anonymity?
- My background and interest: teaching if HE in FE; QM role; AD at QAA for reviewer training and latterly HER AP; left 4 years ago; independent consultant; no vested interest, just a continuing interest in QA of T&L and the direction it is taking.

Subject (policy – practice – culture)

HERA 2017 is described as 'the biggest change to HE in 25 years. Study **aims to find out how QAPs see their role; how they have responded in practice to the changes to external quality assurance requirements; how they think these changes will influence the concept of quality in HE; and what effect this may have on the quality assurance of HE T&L in the UK.**

My questions are about:

- your role and the role of quality assurance; how it fits into the institution
- your /views on the regulatory changes under HERA, with regard to QA
- how you have responded in **practice** in your institution and how the changes have been received
- your views on the concept of quality assurance, how it might be changing and any consequences for the quality assurance of teaching and learning.

Questions

Questions are divided into sections according to the RQ addressed. Questions relating to Trowler's typology of academic's responses to change are indicated with (T). **Section 1: Your role (RQ1)**

1. Can you briefly describe your background/route to this QA role?
2. Can you give a brief description of the main responsibilities of the role and where it sits within the institution?
3. Do you feel that it is a position of power/influence?
4. It's sometimes said that QA occupies an unusual space in education ('third space'). Do you agree with this? How do you think it is viewed by other senior managers? Academic staff?
5. When you arrived in post, was there anything about the quality assurance system which you found unusual?
6. What do you value most about the role?

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7. To what extent do you feel your interpretation/enactment of the role align with the values/culture of your institution?

Section 2: Your views on the HERA changes (RQ1)

8. What do you see as the most significant changes to **external** quality assurance under HERA?
9. What are your views on each of these changes? Prompts may include:
   - OfS
   - Quality Code/Conditions of Registration
   - Emphasis on data
   - Optional enhancement
   - Cyclical to risk-based review
   - Peer review/student reviewer

Section 3: Implementation in your institution (RQ2)

10. What, if any, were the changes that needed to be made to meet the new external QA requirements?
11. How would you describe your approach to communicating this policy change within the institution?
12. Give some **practical examples** of how you implemented QA policy changes internally, eg changes to systems, routines, practices, documents, agendas? What did you do differently; what did you ask others to do differently?
13. Are any of these changes compensating for the disappearance of former external practices/Quality Code? Eg peer review, cyclical review, enhancement?
14. Did past experience or membership of any groups help with implementation strategies?
15. How have academic staff responded to changing QA practices, using the 4 categories: sinking, coping, swimming, reconstructing policy – or something else? (T) Can you give some examples of positive, negative, pragmatic responses? Different disciplines?
16. If there were no changes, why was this?
17. Does your personal response to HERA fit one of the 4 categories - or something else? Examples? (T)

Section 4: Consequences of the changes (RQ3)

18. Overall, what benefits or disadvantages do you think the HERA changes have brought/will bring to your institution?
19. Have the changes under HERA affected your conceptions of HE quality and QA?

20. Have the changes made within the institution affected the way in which the QA function is regarded by academic staff? Any critical incidents/practical examples?
21. How do you think the changes under HERA will affect the HE sector in general?
22. Have you, as an experienced manager, learned anything about policy implementation from this process?

Document

23. Do you have an example of documentation which has changed as a consequence and which illustrates your approach?

Finally

24. Is there anything you would like to add/other comments?

Supplementary/prompts:

- Can you tell me more about that?
- Can you explain in more detail?
- What do you mean by that?
- Can you give me a specific example?

Appendix 2 Data analysis

a) Initial Coding example

Time	Speaker	Transcript
		reconstruction, which is they make changes, they adapt the policy if you like, to be able to sort of work with it, does that sort of make sense and does that kind of describe the way in which you might see your academic staff responding?
00:38:06	S1	Yeah, yeah, and I think there's examples of all of those in the institution, but largely I would say largely staff understand the reason why there are some changes; because of the focus on data, the data is there, isn't? They understand that aspect of it and the importance of the OfS and the need for the University to be registered. You do get some staff who have been here a long time you know and behavioural cultural issues kicked in that you needed a bit more handling, but by and large most staff are willing and are leading the change and it has to come from the academic staff, professional services can only support them to do it and nobody wants to start wielding a big stick to anybody; its fine, it's worked through and there are management routes to deal with staff who perhaps you know - I wouldn't say they are sinking; I would say that there are certain staff who try to ignore what's happening and carry on as they've always done, but that's not going to be OK if they're not meeting our ▓▓ requirements in terms of data, if their programmes aren't, but I don't think there's anybody who hasn't risen to the challenge and most staff understand it; we've done as much as we can do to ▓▓ it internally, yeah. We did the ??? work beforehand, working with the programme teams and we continue to do that with the programme teams on the data side, so I don't think there is anybody who is not complying with that.
00:40:04	S2	No, so overall it's been an effective process, the changes have worked.
00:40:11	S1	Sorry about that, overall it's been what?
00:40:13	S2	It's been an effective process that...
00:40:16	S1	Well the proof's in the pudding and it is and it isn't. I mean you know painting a positive picture, there are aspects where it there's going to be a lot of work required and there's going to be on the tough measures will have to take place at some point, but I think all institutions are going to face that, unless they've got you know, some institutions have got super-duper programmes that, you know, are in the top quartile of the data set, but those are at the lower end and at risk of not attracting funding, will have to take some harsh measures.
00:41:01	S2	So there will be market forces involved.
00:41:04	S1	Sorry, say it again.
00:41:05	S2	There will be some market forces involved.
00:41:09	S1	Market?

Commented [EB(R61)]: Can identify examples of all types of response to change in academic staff

Commented [EB(R62)]: Believes that staff largely understand the reasons for changes

Commented [EB(R63)]: Identifies some behavioural issues in response to change linked to established staff

Commented [EB(R64)]: Believes most academic staff are willing to change

Commented [EB(R65)]: Believes there is a limit to the support which can be offered to staff and management routes may have to be used with those who aren't coping

Commented [EB(R66)]: Doesn't believe any staff are 'sinking'

Commented [EB(R67)]: Identifies some staff as 'ignoring', but notes that this isn't sustainable

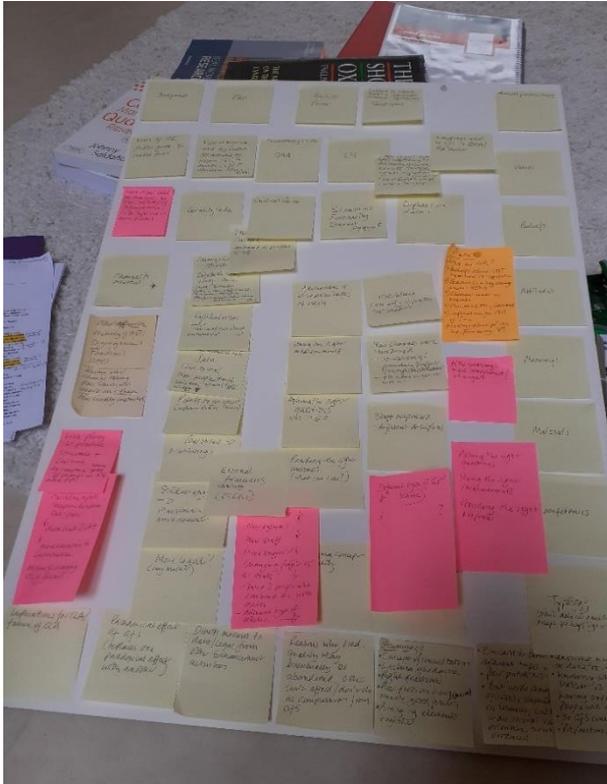Commented [EB(R68)]: Believes that staff are rising to the challenge and are being supported by the QA team

Commented [EB(R69)]: Believes there are aspects of the changes which are working and some which aren't

Commented [EB(R70)]: Anticipates some difficult decisions will have to be made regarding programmes with poor data

b) Thematic coding boards

Appendix 3 Ethics approval letter

Educational Research | Lancaster University

20th August 2021

Dear Barbara Edwards,

Thank you for submitting your ethics application and additional information for *'How are quality assurance professionals in English HEIs responding to changes under the Higher Education and Research Act, 2017?'* The information you provided has been reviewed by Dr Janja Komljenovic and I can confirm that approval has been granted for this project.

As principal investigator your responsibilities include:

- ensuring that (where applicable) all the necessary legal and regulatory requirements in order to conduct the research are met, and the necessary licenses and approvals have been obtained;
- reporting any ethics-related issues that occur during the course of the research or arising from the research (e.g. unforeseen ethical issues, complaints about the conduct of the research, adverse reactions such as extreme distress) to the Research Ethics Officer (Dr Murat Oztok or Dr Natasa Lackovic).
- submitting details of proposed substantive amendments to the protocol to Dr Janja Komljenovic (spvr) for approval.

Please do not hesitate to contact your supervisor if you require further information about this.

Kind regards,

Alison Sedgwick

Programme Administrator
Doctoral Programme in Educational Research

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Glossary

AoC	Association of Colleges
BERA	British Ethical Research Association
BIS	Department of Business Innovation and Skills
DAPs	Degree-awarding powers
DQB	Designated Quality Body
DfE	Department for Education
ENQA	European Association for Quality Assurance in Higher Education
ESG	Standards and Guidelines for Quality Assurance in the European Higher Education Area
HEFCE	Higher Education Funding Council for England
HEPI	Higher Education Policy Institute
HER	Higher Education Review
HERA	Higher Education and Research Act, 2017
HESA	Higher Education Statistics Agency
IHE	Independent Higher Education
IUG	Independent Universities Group
LSR	Lead Student Representative
OfS	Office for Students
Ofsted	Office for Standards in Education, Children's Services and Skills
PSRB	Professional Statutory Regulatory Body
QAA	Quality Assurance Agency for Higher Education
QP	Quality assurance professional
QSN	Quality Strategy Network
QSR	Quality and Standards Review
SPT	Social Practice Theory
TEF	Teaching Excellence and Student Outcomes Framework

UUK   Universities UK

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