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requirements for the Degree of Doctor of  
Philosophy at the University of Lancaster**

# **Benchmarking Academic Standards**

**A Policy Trajectory Study**

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2006**

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## **Abstract**

Perspective: This study is concerned with a specific HE policy arising from the National Committee of Enquiry into Higher Education (NCIHE): the benchmarking of academic standards initiative. It is concerned to scrutinise the inception, articulation, progress and implementation of the policy initiative. The study is concerned to explore the distinctive policy process of the benchmarking initiative and through that to discover more about the policy process generally. In this endeavour social science theoretical debates and, to a lesser extent, theoretic debates in other disciplines - notably overseas development studies - are drawn upon.

A backdrop to the progression of the benchmarking of academic standards initiative is the recognition that educational policy is frequently the terrain on which contestation between the state and higher education is played out. The state's interest in HE policy is noted to be constrained and to focus upon:

- the need to support the capital accumulation process;
- the need to guarantee a context for its continued expansion;
- the need to legitimate the capitalist mode of production including the state's own part in it.

The state's recurring policy interest in higher education within the above context is acknowledged to be the potential contribution of higher education to manpower planning and accumulation of capital.

Quite separate from the contestation being played out at the macro level are other disputes and challenges played out within the microcosm of the policy

process itself. The most potent of these can arise from different ideological perspectives, both articulated and tacit, represented within the policy process. These exert forces which combine to neutralise some potential options and consequently, to constrain outcomes.

Method: The study adopts the form of a policy trajectory study to examine each stage of the policy process. The policy trajectory uses the metaphor of the staircase as a simplifying organisational device to mark out the different phases of the trajectory. This does not imply that the policy trajectory progressed in a measured and regular way with ordered, staged progression to reach the outcome. Indeed the trajectory reveals that at different stages, distinctive social processes were at work and that contestation and ideological difference between stages militated against such ordered progression. The policy trajectory focuses upon the key texts published throughout the period of the trajectory to articulate the purpose, and amended purpose of the policy initiative, upon interviews with participants in the policy process, and upon a questionnaire sent to university departments. There was a critical, interrogative reading of such key texts, and analysis and interrogation of interviews and questionnaires. The policy trajectory is thus able to illuminate competing ideologies, emergent issues, compromise and adjustment, to build a picture of their combined effect on the policy process, in particular to deflect the policy intention and to reconstitute it in an altered manifestation.

That the policy process can be 'disturbed' through changes in the external environment is also recognised and the relationship to the respective stages of the policy process of such external disturbances are referenced and evaluated.

Rationale: The benchmarking of academic standards initiative has been selected for this study because its publicly stated intention was not realised in what was subsequently implemented. The progress of the policy has been characterised by modifications and adjustments to that stated purpose. The policy initiative utilised considerable higher education resources in its construction and implementation.

Conclusion: The suite of actions implemented as a result of the policy initiative on academic benchmarking did not address those specific issues which originally brought the matter to the policy agenda. This finding raised the need for explanations in respect of the policy being scrutinised but also raised questions more generally about the management of HE policy at national level. In particular the apparent absence of any strategies within policy management to recognise and respond when policy intentions become seriously compromised through the policy development and implementation process itself. Finally the study returns to consider implications for conceptualisations of the policy process at macro level and makes a number of suggestions for improvements for the management of the policy process, capable of improving adherence of policy outcomes to policy objectives.



# Chapter 1

## INTRODUCTION

### **The benchmarking of academic standards initiative: a policy trajectory study**

#### **Purpose and Nature of the Study**

This dissertation takes the form of a policy trajectory study (Maguire and Ball, 1994:516) using a number of methodological resources. It is concerned with the policy intention set out in the National Committee of Inquiry into Higher Education (the NCIHE or Dearing report),

*“... institutions need to be more explicit and publicly accessible about the standards of attainment required for different programmes and awards. It would be both impractical and undesirable to try to achieve close matching of standards across the whole of higher education in all its diversity. **What is practicable is to develop threshold or minimum standards which set an agreed level of expectations of awards.**” (NCIHE, 1997 para 10.64).*

*“We recommend to the Quality Assurance Agency that its early work should include: to work with institutions to establish small, expert teams to provide benchmark information on standards, in particular threshold standards operating within the framework of qualifications and completing its task by 2000. (NCIHE 1997 para 10.95).*

(note: bold added for emphasis by author).

and with the subsequent development that policy intention. The QAA’s benchmarking initiative was the practical embodiment of the policy intention in the NCIHE report. It was part of a suite, or ‘bundle’ of policy initiatives designed by the Agency to take forward the recommendations set out in Chapter 10 *Qualifications and Standards* of the NCIHE report.

The report provides an important context to this study. It can be viewed as marking a particular point in the relationship between HE and government in terms of the government's pressure to increase its control over HE (Ball, 1990:8). From that perspective the report provides:

- a lens through which to view the changing relationship between government and HE, and
- an example of government's use of policy within that changing relationship.

The key points of reference for this dissertation are therefore:

- the use of policy within the changing relationship between the state and higher education
- the role of language and discourse within the policy process
- acknowledged and unacknowledged ideological perspectives of participants within the process.
- variation between the conceptual representation of the policy process model, and the reported experience of the policy process
- variation between policy intention and subsequent policy outcomes.

The aim of this study is to provide a narrative account and an analytical history of the benchmarking initiative, using a number of methodological resources. Through it I aim to provide an improved understanding of the academic benchmarking policy initiative and also to offer some insights into the policy process more generally. I do not intend to make generalisations beyond these matters.

## **Author's position**

My interest in this area of policy arises from observation of changes in the relationship between higher education and the state since the mid 1970s, symbolised by Callaghan's Ruskin College speech in 1976, which, to quote the Guardian reporting on 16 October 2001, the 25th anniversary of the speech, still Echoes down the years'. By this the Guardian refers to the idea promoted by that speech that in return for state investment, university education should serve as a preparation for work and make a contribution to the economic health of the country. 1976 is also the year Ball identifies as the point at which the old order where teacher unions and LEA lobbies wielded considerable influence with a weak policy impetus from the DES characterised by consensual instrumentalism, was replaced by conflict and contention and the assertion of greater centralised controls. (Ball, 1990:8).

Co-incidentally, 1976 is also the year that I began my administrative career in higher education. Since that time, primarily through my involvement with the administration of quality assurance requirements for higher education, I have witnessed rapid and increasing pressure on HEIs for increased compliance with the government's economic agenda expressed through policy. This has taken many different forms over the years with the involvement of many different bodies. These have sought to: reduce the autonomy of higher education; direct and modify the curriculum in various ways; redistribute the educational offering according to geographic or regional considerations; set recruitment targets according to government policy; promote various education-to-work initiatives; redirect funding to fulfil particular policy projects; effect increased standardisation of practice and increased

accountability through inspection and public reporting. The NCIHE report can be seen as a watershed in the momentum of continuing and increasing HE policy activity.

I have also observed the sector's attempts to resist some of the political pressure, and indeed a number of the initiatives planned by the QAA to take forward the Dearing agenda were rejected by the sector and subsequently dropped. However much also remained, and the tension occasioned by HE policy is often played out not between the sector and government quangos, but within institutions themselves, between academic leaders seeking to manage the external agenda, and academic staff, the latter group generally expressing concern about interference with academic and educational values and employing passive resistance or token responses to institutional demands.

In terms of the role of HE policy within the changing relationship between the state and higher education, Ozga talks about HE policy being 'contested terrain', arguing that it is struggled over and not delivered in tablets of stone to a quiescent population. She sees policy as having an important role in the tension between education and government. She argues that this arises from the contradictory and ambivalent role of education in its potential to contribute to the government's economic agenda and that this tension is at the root of instability in the relationship, which, she argues, produces swings in the forms of control of teaching professions, from an consensual relationship which privileges professional ideology and encourages self-regulation, to direct regulation which allows the state to control the curriculum but which provokes

revolutionary tendencies in the sector through for example militant unionism. (Ozga, 2000:15).

These matters are of interest in so much that they speak of the state's desire to control higher education and of the acceleration of policy initiatives directed towards that end. The core concern of the author is policy initiatives which interfere whilst adding nothing (Dale 1989:23). In particular, for such policy initiatives to result in something other than what was initially proposed, whilst at the same time, diverting attention and resources. The genesis of this dissertation has been an observation that the policy initiative to secure academic standards through the establishment of benchmarks has been of this order, characterised by shifts and modifications and its outcome neutered and ineffectual in the context of those perceived problems the policy was intended to address. The author does not align her sympathies with any of the participants associated with this activity. In terms of the ideologies referenced in this study, the author leans only slightly towards the position that sees education as a good in itself rather than towards the position that sees education as an potential contributor to national economic health. However, as a 'recipient' of policy, in that as an HE administrative manager I am required to implement such policy requirements at local level, I am unsympathetic with policy processes which impose requirements where there is little or no observable benefit to any current or potential audience. I also own to have common-sense reservations about conceptualisations of the policy process which accept as inevitable that since modification and adjustment will occur, policy can and often will, produce an artefact which does not disturb the policy problem that it was designed to address.

## **Research design**

In selecting the research design, I started with the focus of my intended study, that is, to understand how a policy initiative which, on announcement had been met with considerable hostility by the sector, had, following development, been received, in consultation with the sector, with general acceptance. The common sense intuitive response to this observation was that there had been changes between what had been initially communication and that which had been subsequently developed. The research questions sought to elicit whether indeed such a scenario had emerged, and if so, an understanding of those changes. A pragmatic match of strategies and methods were selected to respond to the research questions.

The research design which suits the above approach is a policy trajectory study (Maguire and Ball, 1994: 5-16). The study considers each of the key stages in the 'life story' of the policy, from its inception to its outcome. In this it is similar to studies produced by Pressman and Wildavsky on the 'Oakland project', a American public policy initiative that sought to create permanent employment to minorities through economic development. \$23 million in federal funds had been committed but after three years only three million had been spent, and little of the policy objectives had been achieved. The Pressman and Wildavsky trajectory study sought to understand how a generously funded project had failed to achieve its objectives (Pressman and Wildavsky, 1973). Lingard and Garrick's policy trajectory study has many similar features, in that a policy initiative with worthy intentions to improve the social opportunities for a specific underclass of the population in Australia also failed to achieve

what had been set out for it. The authors undertook a careful examination of the various stages of the initiative to discover the features at each of those stages which had contributed to the poor outcomes of the policy initiative. (Lingard and Garrick, 1997). Both studies were able to illuminate how slippages of time, clarity of aims, interpretation of policy intentions, resource management decisions, cultural and ideological perspectives of participants, had a cumulative bearing to effect an outcome which was different to that which had been intended by policy makers.

Like those studies, the academic benchmarking trajectory study starts from the observation that the policy outcomes are at considerable variance from the stated objectives in 1997. Like the above studies, this present study traces the policy process through each of its key stages in order to identify the features at each stage which contributed to the variation. The policy trajectory uses the metaphor of the staircase as a simplifying organisational device to mark out the different phases of the trajectory. It should be noted that whilst this is administratively effective, it is not consistent with the real-life progress of the policy process which did not follow the ordered progress that the staircase metaphor implies.

## **Research Questions**

The research questions which inform and structure the study are:

1. To what extent was there unanimity or diversity about *policy intentions* at different treads of the policy development stair case

2. To what extent was there unanimity or diversity in *policy development* at different treads of the staircase
3. What explanations can be found for the divergence between policy intentions and policy outcomes
4. What new critical insights about models of policy formation and policy development can be deduced from the study.

The policy intentions as they relate to the benchmarking initiative are captured in the recommendations set out in Chapter 10 of the NCIHE report. To begin to answer the research questions therefore, I present a commentary on chapter 10 *Qualifications and Standards*, of the NCIHE Report, which contextualised the recommendations relating to benchmarking academic standards. I then turn to the activities which flowed from the recommendations, drawing on texts produced by the QAA, and interviews with a selection of those who served on the benchmarking groups. I also draw on an interview with a member of QAA staff with responsibility for managing the initiative within the Agency. Finally, I undertake a limited review of how the benchmarks have impacted on university departments. I elaborate on these matters in the Methodology chapter.

### **Why is this trajectory study important**

This study provides detailed explanation about the reasons for the gap between a specific policy intention and its policy outcome. The explanations have the potential to be helpful for policy makers in the future. Roger Brown, providing critical comment on educational policy captures the point:



*There is little point in having policies which cannot be implemented. Consideration of key implementation issues should therefore take place at the same time as consideration of key policy options. (Brown, 2001:21).*

In this quotation Roger Brown is reflecting that educational policy has been characterised by instances where the means selected by HE policy makers have not been capable of being executed effectively. I would suggest that observation is applicable to the suite of policies for securing academic standards devised by QAA after the NCIHE report, of which the academic benchmarking initiative was central. I would add a further observation, that in HE policy at national level, there is an absence of a mechanism by which to invoke a corrective response where it becomes clear that effective execution is not in prospect. Rather the tendency is to ‘muddle through’ (Lindblom, 1959) and permit cumulative and ultimately deflecting adjustments.

It is possible that the academic benchmarks initiative as a remnant of the envisaged external quality framework has continued to be maintained by the QAA because they represent so much early investment by universities’ own staff and hence the Agency may see it necessary, politically, to continue with the benchmark statements in order to save face. In this context, the study is important because it draws attention to the existence of policy initiatives which drain resources whilst contributing little of value. It is important that the sector can identify and criticise such activities.

Pertinent to the above, Dale observes that in terms of policy formation, the State is assumed to be unable to contribute anything of its own to the achievement of desired outcomes, but it may unwittingly interfere with it

(Dale, 1989:23). By drawing attention to a specific example of Dale's generalised observation, I hope to contribute to ongoing critical debate on HE policy.

## **Organisation of the Dissertation**

In this *first chapter* I have provided a brief overview of the dissertation. I have also flagged key concepts for the study, drawing attention in particular to the use by government of policy to shape the evolving relationship between the state and HE. My research questions are set out in this chapter.

*Chapter 2:* A key issue throughout the study is ambivalence as to the purpose of HE in the UK and the ideological positions which maintain that ambivalence, and Chapter 2 seeks to provide an explanation for that situation. I provide a background to educational policy development in the 20<sup>th</sup> century. This brief and selective historical perspective is intended to serve to illustrate the changing relationship between the state and higher education in particular, to provide an understanding of why the state had a *laissez faire* attitude up until the 1970s, which allowed education to enjoy a high degree of autonomy, and why this attitude changed in ways that eventually led to the imposition of the QAA quality framework in 2000 – 2001.

In *Chapter 3* I undertake a selective review of relevant literature, focussing in particular on the policy process, and its problematic nature. I draw primarily on social science literature, but also refer to overseas development debates where these provide useful references.

In *chapter 4*, I present my methodology and revisit the research questions. I describe the assumptions and hypothesis I used to guide the identification and refinement of those questions. The study employs different sets of resources to illuminate specific aspects of the policy trajectory and I provide a rationale for the selection of these resources and describe the analytical approaches adopted for each data set. I describe the relevance of those resources to the policy trajectory and to the research questions. I elaborate on the strengths of the different approaches used and also acknowledge some drawbacks. The choices made for research design and methodology are contextualised by reference back to Chapter 3 and the influence of particular studies examined in the preparation of the dissertation.

*Chapter 5* is the heart of the dissertation. I present my findings according to the chronology of the benchmarking initiative, to illustrate how the policy initiative, in its development, became increasingly decoupled from its original intention, charting the events which cumulatively over time effected a set of outcomes inconsistent with the original policy intention.

I also revisit my research questions at appropriate points. The analysis of each of the data sets and the findings of the analyses is set out in *Chapter 5*.

In *Chapter 6* I present a discussion on the findings in the context of the research questions and seek to offer explanations for those findings.

In *Chapter 7*, I offer a reflection from a macro level and consider the critical insights into policy formation and policy development have been elicited from the study.

## **Chapter 2**

### **HISTORICAL BACKGROUND**

#### **A Brief History of Educational Policy contextualising the Benchmarking initiative**

##### **Preamble**

In this chapter, I provide a brief historical account of educational policy development in the 20<sup>th</sup> century up to and including the policy on academic benchmarking in 1997. I intend to show the changing relationship between the state and higher education to contextualise those developments. This chapter seeks, in particular, to provide an understanding of why the state had a *laissez faire* attitude which allowed education to enjoy a high degree of autonomy up until the 1970s, and the reasons why in the mid 1970s this attitude changed. In this chapter, the theme identified in chapter 1, of change initiated by the state being resisted by the sector is further evidenced.

##### **Vested interests, Local power**

Up to the mid 1970s<sup>1</sup>, developments in educational policy can be seen as the product of the pressures brought to bear by different groups operating locally rather than nationally. This is clearly the case in the early part of the twentieth century where educational provision can be seen to be the product of the

1 Britain's economic performance was falling behind that of other European Countries in the 1960's. Steven's notes that the average hourly increase in productivity in Britain between 1960 and 1973 was 4.1%, compared with 6.6 % in France and 5.7 % in Germany. (Stevens, 2004:32). Stevens further comments that "It is unclear whether the idea that universities (and indeed the whole of higher education) were inextricably linked with the growth of the GDP came from government or from universities. What is clear is that it launched an alleged relationship from that day to this and has been the catalyst for transforming the primary purpose of higher education from education to training. Equally it helped transform higher education for an elite to mass higher education allegedly for the benefit of the economy. (Stevens, 2004:33)

beliefs and values of different powerful groups such as the clergy and gentry, the dissenting churches, groups primarily from the middle classes active in effecting educational change at local level, and then later, the municipal alliances of the school board era, the socialist local authorities of the early twentieth century and the suburban state professionals of the post war period. (Johnson, 1989: 99-100).

The impact of these groups and the peculiarities of their specific concerns resulted in a diversity of provision, which served the dominant interests in those localities. Hence local initiatives flourished in the absence of a state view about how education should be organised, and indeed, in the absence of a state view as to the purpose of education. Johnson believes that it is this incrementalism that explains the peculiarly British ambiguity as to the purpose of higher education.

*“The most persistent division (of curriculum categories) has been between the academic (or ‘pure’) and the vocational/technical or ‘applied’). ‘Vocational’, despite its clerical connotations, has often been a metaphor for ‘working-class’. It implies the technical, the manual, and in recent years has been strongly associated with ‘training’. Any area of the curriculum with both ‘pure’ and ‘applied’ sides is liable to bifurcation on these lines - from natural science (‘pure science’ and ‘technology’) to photography (the art and the technique). In these disastrous dichotomies, elite status has lain via the ‘academic’ routes. Literature and pure science have often been dominant disciplinary clusters, heavy with their own mystiques. The overwhelming value to the nature of vocational or technical knowledge has periodically been urged, but this inversion has rarely been sustained or institutionalised....”*

*“Of course they do not operate alone, but interact with pre-existing social and cultural differences. The academic-vocational split interacts richly with class-*

*culture divisions. The science-humanities division is active in relation to gendered social identities. The repeated operation of such mechanisms, working through students' own interests and abilities, acts back on the major social differences, associating cultural preferences, with social positions.” (Johnson, 1989: 98-9).*

Lawton traces party political attitudes and histories in the state's relationship with HE. He describes as 'privatizers and minimalists' those representing the views of the Conservative Party, and notes that the Labour Party debate on education tended to be between pluralists and comprehensive planners. He notes that these ideologies co-existed within an accepted consensus. Beyond this Lawton observes a lack of engagement by political parties in educational policy. In particular, the Labour party, which might have been expected to have used its power to effect social change, in fact made little impact on educational policy. Lawton notes:

*“The history of the Labour Party and education can be summarised as a desire to plan to improve the life chances of working class boys (and, later, girls), but not quite knowing how to, and also being trapped within the deep structure of traditionalist beliefs about education in a society which was, and is, very conservative. They were also prevented from developing a coherent policy by the continued existence of conflicting opinions and even ideologies within the Party” (Lawton, 1992: 16).*

The declaration by C.P. Trevelyan, President of the Board of Education, in the Labour Party's first minority government in 1923, that education should be kept out of politics and that all parties should work for gradual expansion in education, gives expression to the a strong prevailing view of the relationship between politics and education at this time. (Lawton, 1992:23) This state of affairs persisted within the coalition government in 1940, and afterward when

the coalition broke up. Referring to the post-war Labour government, Stevens notes:

*"What was remarkable during what was thought of as the most radical government that Britain had ever seen (Labour 1945-51) was just how irrelevant the tertiary sector seemed to be." "The idea that universities should contribute to the economic success of Britain was not even thought of; and the intellectual wing of the Labour Party, while it might harbour hostility towards the public school remained largely loyal to the universities." (Stevens, 2004: 16-17).*

The analysis of Johnson's, on the pre-eminence of local interests and the academic-vocational schism, and that provided by Lawton and Stevens, on the lack of a political consensus about any imperative to direct education, provide the backdrop to the scenario which prevailed in the early 1950s. However, developments in that decade made intrusion by the state on the academy an even less likely.

*In the mid 20<sup>th</sup> century the academy enjoyed exceptional prestige. The old power of the dons within a university system intimately related to the nation's elite was reinforced by the new power of the code-breakers atom scientists and social engineers of the post war great and good. No longer dependent on student fees or on civic and industrial support but subsidised at arm's length by the state, universities, and to a lesser extent other higher education institutions were more autonomous than ever before (or since). Because of their own prestige as a profession and the heightened autonomy of the institutions in which they worked, scientists and scholars achieved an unprecedented commend over the intellectual agenda. In any case that agenda rested on a firm liberal consensus in which all elite groups, political as well as academic concurred. So here was little basis on which to interfere with higher education's private life and little desire to do so. (Scott, 1989 : 9)*

Stevens notes that in the early 50's the demand for university places continued to grow. Some of this was undoubtedly to do with the availability of funding,



even though economic decline in Britain was increasingly obvious. The economic recovery which was emerging in the countries defeated in World War II - Germany and Japan - did not extend to the UK. (Stevens, 2004:18).

### **The beginning of the end of laissez faire**

In response to the realisation that the UK was being overtaken post-war by other countries in terms of productivity, the government produced a white paper on technical education which proposed the setting up of Colleges of Advanced Technology, (CATs). The purpose of the CATs was to conserve resources, to ensure the national distribution of teaching staff and to improve the UK's competitive position. The government introduced the designation of College of Advanced Technology in 1956. and its concern to establish arrangements for the training of a vocationally and technically qualified workforce can be seen to be established from this point forward.

*"The management of full employment with its much greater need for a responsible attitude to work and its challenge to greater output per man as the only way further to raise living standards, has brought a sense of dependence on education as the key to advance (Ministry of Education, 1956:37)*

Salter and Tapper commenting on the emergence of the state's view of education as a contributor to national economic success sound both a note of caution and also draw attention to persistence of the traditional liberal ideal.

*"Once it is assumed that education's primary goal is to serve the economy, all else is then subordinated to that goal. As an educational principle, the disinterested pursuit of knowledge is devalued. Knowledge no longer has an absolute status, but its worth is contingent upon the yardstick of social relevance, so that applied knowledge is highly valued and pure knowledge regarded with suspicion. Education or training,*

*for occupations that will enhance economic performance is laudable and, conversely education solely for the purpose of individual development is peripheral.*

*Although by the late 50s the economic ideology had made inroads in some parts of the state bureaucracy, those dealing with the universities remained impervious to its charms and, apparently, securely in the grip of the traditional liberal ideal. The result was that two irreconcilable ideologies confronted one another across intra-state boundaries. (Salter and Tapper, 1994:13)*

In 1963 after the report of the Robbins Committee on HE, the CATS, already removed from LEA control and financed by direct grant, were upgraded to technological universities with degree awarding status. However, more and more their courses had begun to look less like technical and vocational preparation and increasingly like the academic courses offered in universities. Their original rationale had been overtaken by a process which came to be known as 'academic drift'. The CATs initiative had lasted less than a decade (Domestic Records Information 24).

The state and higher education were increasingly chafing against each other. In the post-war years the demand for university education burgeoned and the government became pre-occupied with rational management of growth. Notwithstanding that the CATs had been permitted to drift away from the aspirations the government had had for them, ie as centres for vocational and technical education and training, there remained a concern for the training of the sort of work force that the government envisaged was necessary to sustain the economy.

The government tried once more to harness higher education provision to state needs by forming the Polytechnics. Anthony Crosland's speech as Secretary for State for Education on 27 April 1965: the Woolwich speech, recognised that there was an increasing need for vocational, professional and industrially-based courses in higher education, and that "a public sector of higher education, separate from universities was required to promote such courses." The government's White Paper outlined the arrangements for implementing the government's policy for a dual system of higher education, divided by the binary line. The paper: *A Plan for Polytechnics and Other Colleges*, was published in 1966. The polytechnics in the public sector would provide vocational, professional and industrially-based courses. (Crosland's Woolwich speech reported in the THES, quoted in Salter and Tapper, 1994:15) The establishment of the binary divide, by which the universities and polytechnics were to be separately funded, was symbolic of the different educational remit for polytechnics consistent with the governments manpower planning agenda.

Notwithstanding, notions of elitist and liberal higher education continued to be strong:

*"From outside the ivory tower there has nearly always been pressure, varying in intensity at different periods, to make university education more obviously useful and vocational. A university is not a trade school for the production of plumbers (Twining, 1967:404. quoted in Lomas and Tomlinson, 2000:133)*

## **The beginning of the new order**

Changes since the mid 1970's saw a decline in support for an autonomous higher education system and indeed increasing public criticism of it. Some of the reasons for the reduced level of public confidence in HE were: increased student numbers; expansion of the sector; proliferation of new courses and new disciplinary areas, and most importantly a perception that a UK degree had a diminished value. The economic recession in the early 1970s brought with it a renewed and increased concern for effective stewardship of manpower planning and resource management. These developments strengthened the case against the ideal of liberal education, and a higher education system which educated a workforce out of line with economic needs. Funding had continued to be cut by the Labour government between 1972 and 1979 in response to the recession, but at the same time the expansion in student numbers and the sector generally meant that there was a very significant cost of HE to the public purse, and questions were being asked through the media particularly about value for money. Callaghan's famous Ruskin College speech in 1976 made explicit the government's stance to HE. The Guardian reported 25 years later that the speech continues to 'echo down the years' (Guardian 16.10.2001). Certainly, its themes are clear in the report of the NCIHE in 1997. Whilst the 1980s saw a continuation of Government policy for expansion of student numbers, and at the same time reducing the unit of resource, it also sought greater accountability from higher education through increased regulation.

In the context of these economic and regulatory constraints, the relationship between higher education and the state was changing. Henkel and Little

conceptualise the possible relationships between the state and higher education as being on a continuum, with at one end self regulation and an exchange relationship with sponsors, and at the other, sponsorship-dependency and a hierarchical relationship with sponsors. They note that the 1980s saw a suite of policy changes in the UK which sought to move the relationship of the state and HE, from self regulation to a sponsorship-dependency relationship. Moreover, government policies began to become more concerned with micro policies affecting the style and content of higher education, partly in response to employers' perceptions about the adequacy or otherwise of graduates' knowledge, skills and attributes. (Henkel and Little, 1999: 16-17). The clear signal for this swing to the dependency end of the relationship spectrum was the publication of a DES Green Paper in May 85 "Development of higher education in to the 1990s" which identified the government's interest in monitoring performance in relation to its concerns for, inter alia, meeting the need for a skilled workforce, and further rationalising of resources within the sector. The green paper marks a much more purposive step by government to harness HE towards manpower planning than had been evident in its previous incremental approach to achieve that end. It brings HE much closer the sort of dependency model spoken of by Henkle and Little.

The Education Reform Act 1988 is important to the themes of this dissertation for two reasons: it established unambiguously the quality agenda; it the privileged funding arrangements which had been enjoyed by the universities.

The new funding councils established under the Education Reform Act 1988 included a remit for quality within their terms of reference. Three regional HE funding councils were set up with statutory responsibility for ensuring that the quality of publicly funded education was of an appropriate standard and quality. The inception of the funding councils were significant in terms of the government's aspirations for increased regulation and accountability in that coupling of state funding with statutory responsibilities for the quality of education was enabled. The same level of public scrutiny would from this point forward apply to the expanded sector rather than as previously, to polytechnics and colleges. This was a coup for the government. Stevens says:

*Overall the government had other reasons for liking the arrangement. Historically, polys had operated on a far lower basis of funding than universities. The latter's expectations were in the process of being brought down to the poly level. There was now one standard of support (Stevens, 2004: 69)*

Later, the government white paper *Higher Education: A New Framework (DES 1991a)* set out proposals for polytechnics to be allowed to call themselves universities (note that in some cases the polytechnics in question, for example Derby, had only been recently promoted from colleges of HE status). And the following year, the Further and Higher Education Act of 1992 removed the binary line allowing the former polytechnics to become universities and award their own degrees.

Under the remits of the funding councils incepted by the 1988 Education Reform Act, the funding councils set in train the 'quality agenda'. Two forms of scrutiny emerged and dominated the 90s: subject based Teaching Quality Assessment; and institutionally focused Audit. Teaching Quality Assessment

(TQA) was set up by the Higher Education Funding Council in 1992. Audit was set up in the same year by the Higher Education Quality Council, established by the Committee of Vice-Chancellors and Principals (CVCP) and the Standing Conference of Principals (SCoP). It was a refinement of the audit process set up by the CVCP's Academic Standards Audit Unit and was concerned with the scrutiny, *inter alia*, of institutions' quality assurance arrangements, teaching learning, student assessment and degree classification. Both TQA and Audit procedures required the institution to prepare a self-critical assessment of its performance together with a statement of aims and objectives. It was the statement of aims and objectives that were the basis on which judgements were made by peers.

The TQA method missed any notion of standards beyond those defined by the institution itself. HEQC addressed this through a redefinition of 'quality' in the context of HE, to include a specific focus on academic standards. Later the HEQC was to instigate the Graduate Standards Programme (GSP) which operated from 1994 and reported in 1997. It considered the most promising approach to establishing standards lay in articulation of the general qualities that might be expected of any graduate in terms of cognitive and transferable skills and suggested that it might be possible to identify clusters of overlapping attributes that would be common outcomes in cognate fields. (HEQC 1997a:6-13). The GSP, whilst having an impact on HE debate and particularly on 'graduateness', was not formally taken forward by the government. Rather it favoured the approach to standards offered by the NCIHE.

The National Committee of Inquiry into Higher Education reported in February 1997 less than a year after the GSP report, offering 142 recommendations on the long-term development of higher education. The report of the NCIHE was applauded by the Government. The report's recommendations and the

government's response to the report (DfEE, Feb 1998) represent a flow of dominant messages which required the sector to be compliant to the demands of society as interpreted by the state machinery.

QAA, in its task of taking forward the NCIHE agenda proposed a framework for national quality assurance. Recommendation 25 was embraced in the academic benchmark statements initiative.

### **The changing relationship between education and the state**

The above history has demonstrated the changing relationship between the state and higher education over time, particularly over the two decades which preceded the NCIHE report.

Clark offers a conceptual framework by which to understand the changes over that period. He sees the state and higher education locked in a relationship with a third societal power, which he calls the markets for higher education, made up of those elements of society which have an active interest in HE.

Clark demonstrates his concept via a comparison of HE-state relationships across a number of countries. He posits that it is the dynamics of this triangular relationship which determine the degree of latitude enjoyed by any higher education system to pursue its own priorities and direction. He argues that it is the state machinery within this dynamic triangle which has the



greatest influence on the behaviour both of the educational system and on the relationship of that educational system with society. He shows that where state authority is more relaxed, then other factors come into play so that education systems become increasingly responsive to market systems, but are also able to behave autonomously in a variety of ways. (Clark, 1986:136).

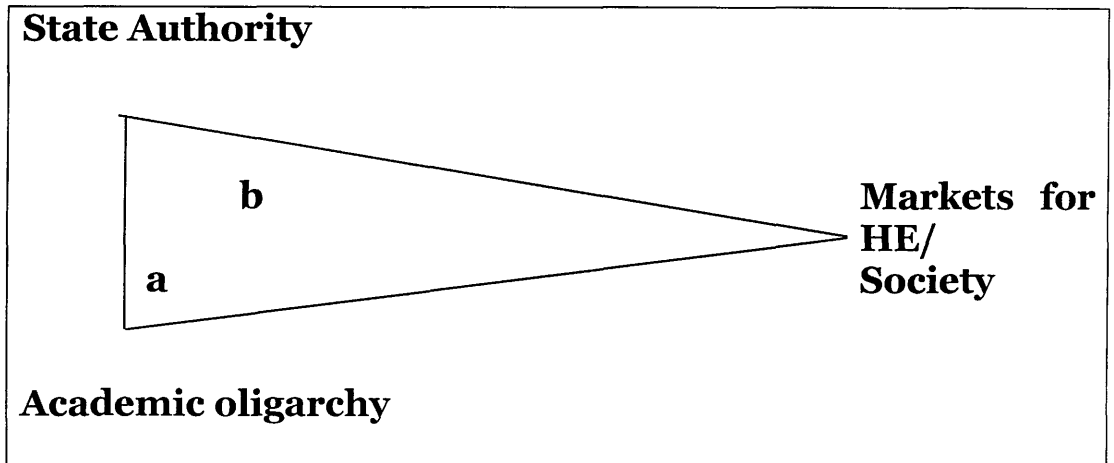


Fig 1 The Triangle of Co-ordination after Clark (Clark, 1986:143)

Using Clark's conceptual framework, it is possible to plot the position of UK Higher Education in terms of the balance of power enjoyed by the academic oligarchy in their relationship with the state and society, as moving from the position 'A' in the early 1980's where higher education was largely autonomous, to the location identified by 'B' in the present day where state control exerts substantial influence.

Clark observes that higher education in the UK continues to maintain considerable autonomy, and is capable of resisting to an extent the attempts of the state to wrest authority from it, through legislation and policy initiatives. Retention of this degree of autonomy he attributes to the practice in the UK of

involving influential academics to serve on some of the state's operations, for example in audits and assessments of the university provision. (Clark, 1986:143).

Dale provides comment which adds to the above. He points out that a contributory factor in retention of autonomy is the continued assertion by the sector of the pre-eminence of pupils' interests over the economy and industry's needs and the persistence of teachers' commitment to the 'legitimatory function of education' ie that education is a good in and of itself. (Dale, 1991:29).

Examples of both explanatory features identified by Clark and Dale can be seen to have operated in the context of the benchmarking initiative. In particular it is clear that the involvement of eminent academics in the benchmarking process had an impact on the eventual outcome of the initiative. It can be assumed that their world-view would have been consistent with that described by Dale and that this would have been a contributory factory to the outcome of the policy initiative.

Ozga argues that it is the ambiguity in the purpose of education, ie its legitimatory function or its capital accumulation function, which is the source of turbulence and struggle over policy. She sets her argument in the context of general themes about the state and society which belong to a broader research endeavour into the understanding of the processes of change and 'new accumulation regimes for citizenship and social justice' being pursued by Habermas , Offe and Bourdieu and others. Educational policy she argues, can be seen as one of the primary tools of government in its aims of securing

particular outcomes, and more generally of aligning HE to the economic needs of the state (Ozga, 2000:6). She sees education policy research as an area of particular significance to those larger debates in terms of its capacity to challenge and contest policy initiatives. From this position Ozga argues that policy can be understood as a process involving negotiation, contestation or even struggle between different groups who may lie outside of the formal machinery of official policy making, including those actors upon whom the policy is designed to impact.

Fig 2, later in this chapter, provides a list of key developments at national level for quality audit (institutional level scrutiny) and quality assessment (subject level scrutiny) in United Kingdom Higher Education, and the organisations which initiated them. From Ozga's perspective this intensity of policy development since 1985 can be read as manifestations of the struggle between higher education and the state.

#### *Commentary.*

In this chapter, I have offered a brief and selective history of educational policy in England in order to provide an appreciation of the background to the report of the NCIHE and its proposals for benchmarking academic standards.

In particular, this chapter has sought to draw attention to different perspectives and ideologies about the purpose of education and the part played by policy in the tension in the relationship between the government and higher education.

Fig 2 Key developments at national level for quality audit (institutional level scrutiny) and quality assessment (subject level scrutiny) in UK HE and the organisations which initiated them, since 1985.

	Year	body	focus	Key developments at national level
<b>Thatcher</b>	1985	Govt	Inst	Green paper: Performance Indicators. Calls for the construction and regular publication of a range of performance indicators – Identifies govt interest in mechanisms for evaluating the performance of HE.
	1990	PCFC	Inst	Polytechnic and Colleges Funding Council, set up to oversee funding in the non-university sector 1991-93.
	1990	CNAA	Awards	Council for National Academic Awards Set up to validate degrees offered by institutions not holding university Status.
	1990	CVCP	Inst	CVCP(Committee of Vice-Chancellors and Principals) (subsequently Universities UK). Academic Audit Unit of the CVCP set up to oversee the conduct of <b>Quality Audits</b> .
	1991	DES	Over arching	1991 White Paper Higher Education: a new framework. The White Paper distinguishes between <b>quality audit</b> and <b>quality assessment</b> and signalled the introduction of Quality Audit (concerned institutions own QA arrangements) and Teaching Quality Assessment (concerned with the quality of teaching and learning in institutions).
<b>Major</b>	1992	Funding Councils	Subj	Funding councils established, to replace the PCFC . Councils have a responsibility for quality of provision and adopt the responsibility for teaching quality assessment.
	1992	HEQC	Inst	Established by CVCP and SCOP, the HE Quality Council had a Broad and overarching quality assurance remit and is given responsibility for <b>Quality Audit</b> , (later <b>Continuation Audit</b> . Replaced in 2002 by <b>Institutional Audit</b> (revised methodology introduced 2006), which both it included a published report.
	1994	HEQC : GSP	Awards	CVCP in response to a Secretary of State initiative asks HEQC to consider the development of a project to establish standards of degrees. The <b>Graduate Standards Programme</b> is established.
	1994	HEFCE / HEQC	Inst Subj	HEQC/HEFCE Joint Statement M1/94. Establishes a review of the extant arrangements for 1) <b>Quality Audit</b> : (under aegis of HEQC) and 2) <b>Teaching Quality Assessment (TQA)</b> (under aegis of HEFCE)
	1995	HEFCE	Subj	Revised model of TQA called ' <b>Subject Review</b> ' includes grading against six core aspects of provision
<b>Blair</b>	1997	QAA	O'arching	HEQC replaced by QAA.
	1997	NCIHE	sector	Report of the National Committee of Inquiry into HE – produced over 100 recommendations.
	1997	QAA/ HEQC	Inst	<b>Continuation audit</b> . designed to be a bridge between the original audit model established 1991 and the model to be devised by the QAA
	2000	QAA	Inst/ Subj	<b>Academic Review</b> included arrangements for inspection at subject level and at institutional level. Was withdrawn following Blunkett intervention in March 2001, but continues for some providers.
	2002	QAA	Inst	<b>Institutional Audit</b> (plus a suite of QA arrangement to be inspected within Institutional audit) Includes DATS (disciplinary audit trails to allow scrutiny of themes including performance and QA compliance at subject level. Replaced by new methodology in 2006.
	2004 on going	UUK SCoP	O' arching	Burgess Report, concerned with <b>Measuring and Recording Student Achievement</b> makes recommendations for consideration by the HE sector. Intended to lead to "classificatory systems for representing student achievement" that meet the needs of different stakeholders such as academics, employers and students themselves. A concern is to enable employers to distinguish between job candidates.

## **Chapter 3**

### **POLICY: PROCESS AND ISSUES: A selective literature review**

The literature drawn upon for this chapter was searched according to my interest in understanding the particular policy initiative which is the subject of this study. It is therefore selective and directed by my observations of the benchmarking initiative. The changes and shifts within that policy process were of particular interest given my initial perception of an uneasy relationship between the objectives of the policy and established sectorial practice.

The literature search enabled me to locate my own interests in the context of the research findings of others and to understand a broad range of perspectives with a bearing on my interests. It also enabled me to justify my chosen topic and to locate it within the broader research on HE policy.

This chapter is organised as follows:

- Problem identification and policy development;
- The policy process: models and conceptual frameworks organised to examine the policy milestones of policy formulation; policy implementation; policy evaluation;
- Other policy process matters arising from examination of the literature.

#### **Problem identification**

Dale states that there may be many views about what educational policy activity might seek to bring about but posits that only those matters arising

from the three dominant problems of the state's relationship with the education system has any chance of being implemented:

- the need to support the capital accumulation process;
- the need to guarantee a context for its continued expansion;
- the need to legitimate the capitalist mode of production including the state's own part in it.

He contextualises his assertion by stating that any capitalist state is confronted by these same basic problems which derive from its relationship with capitalism (Dale 1991:9).

Ozga considers that government's need to support the capital accumulation process is a fundamental tension in the relationship between government and teachers. In her view the use of education in governmental manpower planning is something to be resisted by teachers and believes that policy initiatives must always be examined and where necessary challenged. She sees teachers' capacity to research policy of particular importance in this endeavour (Ozga, 2000:2-12).

Colebatch in seeking to address the question 'where do policy initiatives come from' has a similar point to make as Dale about persistence of some policy agendas. He argues that a feature of policy activity is that the same problems surface again and again. Frequently those involved, and the approaches adopted, are different (Colebatch, 2002: 27). Such a scenario has already been pointed to in this study, in Chapter 2 where a review of higher education policy since the middle of the 1990s reveals repeated attempts by the

government to implement vocational training through higher education, with only partial success.

Callaghan's 1976 Ruskin College speech exemplifies the points made by the above writers and can be identified as the point at which the state sought to establish unequivocally the terms of its relationship with higher education and a consensus about education's alignment with economic objectives. Whilst the argument was broadly based in 1976, as this chapter shows, there has been accelerating and increasingly focused policy activity generated since that time, well aligned to the agendas which Dale argues are the primary concerns of the state's relationship with higher education.

Whilst the above discussion has focussed on *what* issues reach the policy agenda, a number of researchers have been interested in *how* issues reach the agenda. And in particular how they find shape and expression. In the area of international development studies, development discourses are offered as one explanation as to how issues come to be shaped and eventually arrive on the political agenda (Sutton, 1999:11-12, Roe, 1991:287-297). Social sciences literature too offers a commentary on discourse development. This posits that discourses serve to coalesce a group of ideas, concepts and explanatory accounts. They give meaning to a specific phenomenon. They serve to simplify situations and in so doing, also filter meaning. They can shape and define an issue in a particular way and link it with other prevalent ideas, concerns and discourses. In this process, they can privilege the interests of one faction over another and marginalise alternative views and interpretations. They legitimise ways of speaking and thinking about a particular matter. These discourses

present an issue in seemingly neutral, rational and apolitical terms whilst obscuring political underpinning, and by so doing make alternative views appear irrational and illogical (Foucault, 1972:8; Shore and Wright, 1997: 3-34; Carabine, 2001:68).

The media are increasingly viewed as having a role within the development of discourses and in pushing issues up the political agenda. For example, their influence can be seen in the way a particular policy problem is presented and reported upon, the particular image put forward, the selection of some aspects and the eliding of other more complex aspects. 'Agenda setting' is the term given to describing the ability of the media to tell the public what issues are important. Dearing and Rogers in their influential book *Agenda Setting* took as its point of departure, the question as to why some issues receive more public attention than others and claim that issues reaching the attention of decision makers do so on basis of a social construction of reality whereby perceptions count at least as much as reality (Dearing and Rogers, 1996). McCombs and Reynolds in their research about political socialisation state that "establishing salience among the public so that an issue becomes the focus of public attention, thought and perhaps even action is the initial stage in the formation of public opinion (McCombs and Reynolds, 2002:1). Kiouisis et al also found evidence for placing agenda setting within the broader process of political socialisation and argue that the relationship and the impact of agenda setting on public opinion requires further study. (Kiouisis et al, 2005: 756-773).



In respect of the last points about development discourses and the power of the media power to present particular images and constructions to the public, I make the point in this chapter that a specific academic standards discourse emerged in the second half of the 1990s, which shaped public perception about the quality and standards of degree courses, concentrating upon and simplifying selectively certain issues to form a particular image of those issues, to lead to a specific and constructed public perception.

Once an issue has reached the political agenda then typically, policy will be generated. The following section examines the processes by which that is enacted.

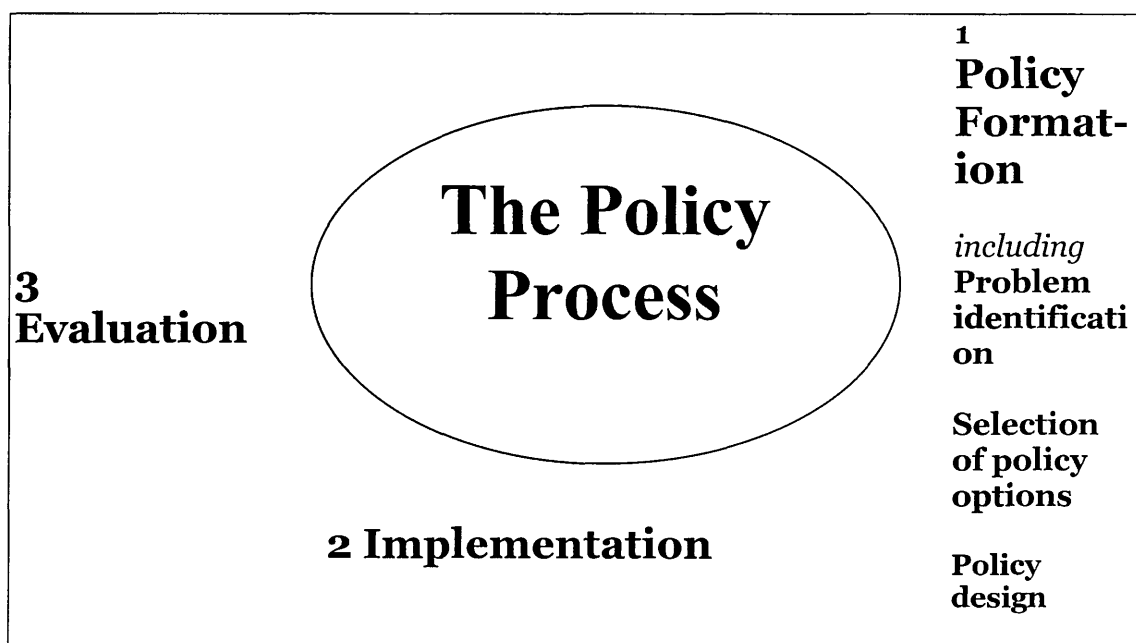
## **Policy process**

An overview of different conceptualisations of the policy process was acquired through a reading of selected sociological texts together with a small number of texts on international development policy studies. The latter readings were driven by an interest in possible disciplinary differences in the approaches adopted to the phenomenon of implementation gap (Sharpe, 1985:362) a strong theme in the review of the social sciences literature on the policy process. Diversity in policy development and policy implementation is also a perceived feature of the benchmarking initiative and a key element of the research questions for this study.

Generic models of the policy process identify a linear sequence of events where one stage moves logically onto the next through a series of stages. Fig 3 provides an diagrammatic example. Some social scientists identify as many as

eight discrete stages associated with the policy process (Colebatch, 2002:51), three or four are also variously identified (for example Rist, 1994:4; Barkenbus, 1998:1). Variations typically relate to the policy formulation stage so that this stage is either extended or contracted.

For the purposes of efficient organisation of the issues which emerged from the literature review, I have adopted the convention of a three part policy process.



**Fig 3 Example of a representation policy process, of Policy Making and Policy Implementation<sup>2</sup>.** After a depiction offered by Texas Politics.

***Policy formulation stage***

An assumption in the conceptualisation of the policy formulation stage is about decision makers having access to appropriate **knowledge and**

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<sup>2</sup> Texas Politics is a project of the Liberal Arts Instructional Technology Services at the University of Texas at Austin <http://texaspolitics.laits.utexas.edu/> (20.03. 07)

**information.** A number of writers have raised questions about the knowledge and information which finds its way into the decision making process, and also about the selection by decision makers themselves as to the knowledge and information that they will draw on.

Miller and Green make the point that the knowledge and understanding that will be brought to policy making will be shaped by ideological and philosophical perspectives held by policy makers, and that there are underlying tacit assumptions associated with those perspectives which guide the formulation of policy.

They argue that in world development scenarios some world development policy problems appear permanently mired by such conflicting but unexplored ideologies and assumptions (Miller and Green, 1999: 1-10).

Roe discusses the problems of managing knowledge and information in policy scenarios where there is typically almost too much information and attendant complexity for policy makers to make sense of and manage. He notes that in third world development initiatives one way that policy makers and bureaucrats make sense of such scenarios is to develop narratives which help simplify the ambiguities and uncertainties. The danger then, however, is that such narratives or stories can acquire status and become regarded as received wisdom. The development of solutions may then not match the complexity of the reality of the situation because of the extent of oversimplification. He also draws attention to the tendency in such scenarios for the decision making

process to be separated from those likely to be affected by the policy, offering the potential for the policy not to take full account of the lived-experience of those individuals. Roe argues that the production of these broad explanatory narratives are therefore themselves implicated in the misalignment between policy outcomes and the problems which require to be remediated. He attributes policy failure in world development contexts to shortcomings in policy planning arising from the difficulties in understanding fully the complexity of the environmental situation (Roe, 1991: 287-299).

Ambiguity and complexity are not the sole preserve of international development policies.

Ambiguity as to the key concepts underpinning the policy initiative was found to be a major deficit in the policy trajectory study undertaken by Lingard and Garrick in their study of a national policy initiative to improve social equity through access to educational opportunities in multicultural Australia between 1994 and 1995. Their 'trajectory' followed the generation of the policy at national level and its implementation within a particular school. They note that 'social justice', a concept which sought to convey the essence of the policy task had no essential meaning which remained inviolate, constant and uncontested across time, place and political regime. They note too that its status was unclear to teachers because of other policy agendas operating at the same time. They capture the fragility of the key concept of social justice in their description of the reception of the policy in the school they study as follows: "competing discursive constructions of social justice were significant

in this process, as the concept was contested in an ongoing fashion.....This was a factor in the contingent relationship between the strategy and its reception in the school". The ambiguity was made more acute they argue, because a number of other policy messages were aligned to broader economic government agendas. Teachers were as a result unsure which messages to heed and which agendas were the more important. Therefore, they observe, the concept of social justice was distorted, reconstituted and weakened through "its coupling with or subordination to the meta-policy status granted to the broader economic reconstructing agenda" (Lingard and Garrick, 1997: 157-178). There are similarities between this scenario and the benchmarking initiative in the key issue of ambiguity of central concepts. In the case of this study – academic standards and academic benchmarking. Chapter 5 shows that both these concepts had different meanings to different constituencies involved in the development of the policy.

Complexity was the main issue in the implementation of the National Curriculum in the UK in the late 1980s. The account of Duncan Graham of the introduction of the national curriculum, a huge, multi-faceted undertaking constrained by ministerial deadlines, speaks of the difficulties of establishing and maintaining coherence when a policy initiative covers many different areas of activity. The author also reports on the difficulty of maintaining effective management of the undertaking once there were ministerial changes (three different Education Secretaries during the three year life of the National Curriculum Council), during which perspectives changed and commitments shifted. Interestingly, in that policy scenario, the need for

continuing control for monitoring and evaluating the effects of the policy had been a ministerial commitment at the outset, although that commitment was subsequently limited. (Graham, 1993:95) I return to the matter of monitoring and control of policy initiatives later in this chapter.

Even when policy scenarios are not ambiguous and heavily complex in the way that Roe, Lingard and Garrick and Graham above describe, there may still be a search for simplification by policy participants arising from various sources: political; bureaucratic; time-related. The cumulative effect of these pressures is likely to encourage policy makers to be selective in what knowledge and information they choose to consider as important in the policy formulation stage (Barkenbus, 1998:2).

Stone argues that there are other assumptions about knowledge and information which require exploration; in particular what kind of knowledge and information finds its way into the policy formulation phase. She argues that it is important to question who influences what knowledge and information is utilised. Her position is that such knowledge cannot be viewed as apolitical. (Stone et al, 2001:6).

Clay and Shaffer comment specifically on bureaucratic pressure. One of the impacts on the policy formulation stage is something they describe as 'the bureaucratic paradox or irony'. What they mean by this is that there is within the policy process an additional and largely unacknowledged agenda operating where those involved in policy making have a set of bureaucratic concerns which influence their behaviour and their choices just as much as the concerns to address the policy problem. These concerns include getting

something done but avoiding risk, spending the funding allocated to the project within the time scales allocated and seeking to satisfy the expectations of various primary and secondary audiences. They argue that these bureaucratic considerations influence and constrain the policy process, by, in particular, limiting the options which appear to be available, but which in reality are restricted, some options being discounted by policy makers because of bureaucratic factors. They argue that the development of policy cannot be understood or assisted if the bureaucratic irony is neglected. In their view, the policy process must recognise what is actually available on the agenda (Clay and Shaffer, 1984: 10).

In considering the personal attributes which policy makers require in the the policy formulation stage, Rist makes the common sense point that policy makers require the skills and expertise to develop a response to the problem or condition before them (Rist 1994:5). However Barkenbus suggests that individuals with requisite skills for effective decision making are exceptional beings when he notes that “Political leaders for generations, indeed millennia, have sought the blend of intelligence, wisdom and systematic reasoning that a certain individual possess. When these qualities are combined with knowledge of a particular substantive area and its history, the opportunities for enlightened decision making are considerable” (Barkenbus, 1998:5).

The phrasing here conveys the writer’s view that such a combination of skills is probably rare, and the implication is that most policy is formulated by those less gifted than the individuals described in the quotation, with the inescapable consequences for the quality of decision making.

The assumption therefore that “decision makers work in a ‘rational man’ context in which the decision maker has all the necessary attributes, unlimited time, resources and access to information – dispassionately weighs alternative policies to find the technical solution that best maximises public welfare is generally questioned by researchers (Barkenbus, 1998:2).

### ***Policy framing***

The understanding and information brought to the policy formulation stage will influence the way the policy problem is framed and the policy task is defined. Barkenbus links the degree of specificity in policy objectives of this stage with the degree of success in implementation, an enhanced degree of specificity being more likely, he argues, to have transparency and predictable outcomes. Barkenbus also draws attention to the phenomenon of gradual but perceptible altering of how decision makers perceive issues and their solutions, as they grapple with the policy problems and the practicalities of possible alternative solutions. (Barkenbus 1998:1-10) Both Rist and Colebatch comment on the difficulty in complex problem areas of crystallising what the actual problem is. And of course there might well not be a single correct definition (Rist, 1994:5; Colebatch, 2002:19).

Lindblom exemplifies this situation as it relates to the formulation stage of the policy process.

*“Policy makers are not faced with a given problem. Instead they have to identify and formulate their problem. Rioting breaks out in dozens of*



*American cities. What is the problem? Maintaining law and order? Racial discrimination? Incipient revolution? Black power? Low income? Lawlessness at the fringe of an otherwise relatively peaceful reform movement? Urban disorganisation? Alienation?" (Lindblom, 1968:13).*

Practically, the search may be for a problem definition which realistically matches an identifiable, accessible solution - as suggested earlier 'muddling through' in a pragmatic way (Lindblom, 1959:79-88).

### ***Implementation stage***

Colebatch argues that gaps between policy intentions and policy outcomes can be understood to be a product of the implementation stage of the policy process and in particular, the result of the actions of those participating in the implementation of the policy. He offers a critique of the policy process as comprising both vertical and horizontal elements. The vertical element he describes as the authoritative goal directed actions required by the policy directive. The horizontal element he sees comprising those participants in the policy process who are likely to have distinct ideas about those goals and priorities. These interested parties and participants will have their own analyses of the problems and will seek wider support for what they see as the more appropriate courses of action. This diversity of players he sees as the source of divergence. Colebatch's analysis of the tensions resulting from the 'horizontal' plane of the policy process is analogous to that described by Lipsky when he discusses the role of 'street-level bureaucrats' in the policy process. Lipsky observes that policy makers in imposing mandates have little sense of the realities of the context in which those mandates are to be effected. It is thus at the 'street-level' that practical difficulties must be addressed and that

those in charge of implementing policy initiatives in practitioner contexts must therefore exercise their discretion. Such discretion might be to enforce the mandate either rigidly or flexibly. Lipsky argues that in this way, policy is made on a daily basis at street level. Lipsky and Colebatch agree that it is not possible to divorce the vertical authoritatively directed mandates, from the horizontal – the actions of those involved in implementation have to be seen as part of the process (Colebatch 2002: 60-65; Lipsky 1979).

Reynolds and Saunders too note that in practice there is a necessity of intervention at the point at which policy becomes integrated into the work-flows of employees, in the form of discretionary interpretive decision-making in order that policy requirements match delivery contexts. Reynolds and Saunders see these activities as the practical means which enable policy to be assimilated into practitioners' own practice, where managers charged with implementation engage in 'reinterpreting, overlooking and adapting' the requirements of the policy. The researchers describe this process as 'unacknowledged operations on the implementation staircase'.

*"In making an active response to policy requirements, heads and co-ordinators had to suss out the situation both outside and inside the school and find some accommodation between internal and external trends...Then to get things moving, they had to negotiate unobtrusively with colleagues over interpretations of requirements.... Most of this negotiation was informal with its effectiveness bound up with the extent to which the parties were sensitive to their respective degrees of confidence and capability...Heads and co-ordinators had to be knowledgeable enough about the import of policy documents to mediate them in relation to colleagues differing stages of concern" (Reynolds and Saunders, 1985: 209-210).*

Brodkin argues that both the literature and everyday common sense experience indicates that policy is often replete with ambiguity, conflicting objectives and uncertainty and that far from being deviant and the product of wilful obstruction or incompetence, interpretive intervention is necessary. Brodkin contextualises this view by noting that strategically it is necessary for policy makers to oversimplify problems, overstate solutions and mask competing objectives in order to build a legislative majority. However, she recognises that the benefits of such an approach are better geared to political credit claiming and blame-avoiding, than to successful implementation. She also notes that tendencies for over simplification are particularly notable in those contested areas which politicians would prefer to avoid.

*“The difficulty occurs when the political logic of policy making confronts the administrative logic of implementation. Ambiguous , complex and discretionary policies are unlikely vehicles for producing consistency, certainly and transparency in policy implementation” (Brodkin, 2000: 3).*

Pressmen and Wildavksy in their policy trajectory study of an employment programme in Oakland USA, initiated by the Economic Development Administration and designed to aid a specific depressed area, showed the serious consequences where political logic is adrift from the administrative logic of implementation. Tracing the course of the Oakland project from its inception in 1966 over the subsequent four years, they found that little had been accomplished during that period. Their findings were that implementation had proved to be difficult and time consuming because there were: conflicts with other extant policies and guidance; bureaucratic

complexities; conflicts of interests; antagonistic relationships; high levels of uncertainty; and an impossible time schedule (Pressman and Wildavsky, 1973). Most significantly, the Pressman and Wildavsky study shows, like the Lingard and Garrick research, that at the heart of the project were deficiencies in the central assumptions underpinning the theories about what it was that needed to be accomplished.

Clay and Shaffer identify the cause of implementation gaps differently. They are particularly critical of the disarticulation or 'dichotomy' between the policy formulation stage and the implementation stage. They argue that it is this which leads to failures in prescription, diagnosis or performance. They also assert that implications of these failures are more or less consistently not dealt with in the common practices and discussions of public policy" (Clay and Shaffer, 1985: 5).

Stephen Biggs has other comments about deficits in the policy process. He considers that policy makers, on one side of the dichotomous divide, are entirely aware of the limitations of their undertaking and that they construct 'escape hatches' whereby they can escape responsibility for the shortcomings which subsequently emerge. "This approach leads to all too familiar outcomes. The planner and policy analyst can avoid accountability of his 'optimal' approach by falling back on the convenient excuses for explaining failure 'in implementation' ....the 'escape hatches' of the public policy analyst." (Biggs, 1985:59).

The above commentaries in the literature review point to the reasons for dissonances between policy formulation and policy implementation which arise from situations whereby those charged with implementing policy requirements are unable to integrate those requirements into normal practices and workflows. This leads to a tension between the authoritative directives and implementation of those directives which, the review suggests will be resolved at the interface with practitioner contexts. Although not explicitly stated, the above review suggests that resolution of this tension will favour a solution which privileges the practitioner context since this is practical and immediate and likely to be associated with deadlines, and hence the gravitational pull in the implementation stage will be away from the policy intention. A context here will therefore favour a 'satisficing' response, ie a response which is expedient and sufficient, but likely to fall short of the spirit of the policy intention.

An issue to be explored here relates to the level of generality at which policy is formulated. Although Brodtkin's arguments about policy formulated at a high level of generality being useful to garner political support are interesting, they are not helpful to the general problem of policy which does not effect what it sets out to effect, assuming that the purpose of the debate is to consider how the policy process can be less unpredictable. The issue appears to be about the balance between high generality and sufficient specificity in the policy formulation stage to direct the tasks which flow from it. To state it another way: policy formulation in order to be enactable has to have a sufficient salience to the policy context to enable sufficient definition of the intended response, together with specificity of the parameters within which

implementation decisions for adjustment are permitted. I am overstating the rationality, in order to make the point that there is, in the descriptions of the policy process included within this review, a consensus that conscious consideration within the decision making stage of an appropriate balance between generality and specificity would be helpful in managing the policy process. It is clear that the greater the 'height' of generality in policy formulation, the greater will be the number of attendant potentially negative obstacles which require to be overcome. Reduction of the vagueness in policy decisions lies within in the gift of those charged with decision making and goes back to the issues set out earlier, about the skills of policy makers, their use of appropriate knowledge and information and an awareness of the consequences attendant on the search for simplification. Explicit consideration of these matters could be productive in narrowing the implementation gap and reducing the reliance on interpretation and adjustment by street level bureaucrats operating in the horizontal plane.

Notwithstanding the above issues about implementation, there are some circumstances where policy is simply not implemented at all and is rejected by practitioners. Offe notes that where policy proposals offend the deeply held views of the policy audience, then the state's capacity to effect change through policy initiatives is severely restricted in such "policy areas where the passions, identities, collectively shared meanings, and moral predispositions within the 'life world' of social actors (rather than their economic interests) are the essential parameters that need to be changed in order to achieve a solution." (Offe, 1990:247).

## ***Evaluation***

Clay and Shaffer, quoted above, see the avoidance of confronting failures in policy as being endemic within the practice of policy makers. They argue that this is deliberate and used as a means of reducing or avoiding responsibility for failures (Clay and Shaffer 1984:5). Barkenbus agrees that policy evaluation is the 'forgotten' element of the policy process. He identifies the underlying cause for this as political, observing that the policy process is set in a highly political context where proposals for addressing issues high on the public's agenda are more likely to attract political and the public approval than evaluating and addressing failing policy initiatives. In his opinion this is why evaluation is often the neglected part of the policy process. Although he speaks from an American context, his assessment of the political influence on policy evaluation can also be understood from a UK perspective:

*"There is much more attention to creating new laws and programmes than to evaluating the performance of existing ones....However when we place this phase (evaluation phase) in the political context of the policy cycle, the reason why evaluation doesn't garner support becomes apparent: It could prove embarrassing to those who were responsible for formulating and implementing the policy....decision makers function in a political milieu where success is critical for re-election. This frequently translates into perceived need to repress uncomfortable facts derived from impartial evaluation or the need to conduct evaluation in a context certain to show positive results. This tendency, along with a predilection for maintaining the status quo, also explain why evaluations no matter how carefully conducted are often ignored or shunted aside by decision makers." (Barkenbus, 1998:1-10).*

## **Other matters on the policy process arising from examination of the literature**

Lindblom (1968) argues what the foregoing discussion has made self-evident that the policy process is far from the neatly organised and compartmentalised process suggested by the policy cycle. He believes it proceeds through a series of stages through which policy is incrementally modified in a pragmatic way to meet the demands of pressure emanating from various interest groups, but concerned to avoid costly innovation or major departure from traditional norms. He presents the policy process as 'muddling through' in a pragmatic way to ensure that government can manage issues as they rise up the political agenda. (Lindblom, 1968).

Downs points out that no single issue however important can remain high on the public agenda for long. His explanation is that there can be changes in the public's perception of the issue, recognition of the intractable nature of the problem, or loss of interest in particular because of the cost of solutions. (Downs, 1972:38).

Explanatory accounts of the reasons why implementation gaps occur drawn from social sciences literature emphasise in particular the involvement and contribution of human actors in both the policy formation stage and the implementation stage. Explanatory accounts in international development studies offer different perspectives, which include a broader range of explanations for such gaps, such as inaccurate or incomplete research, flawed policy design; insufficient resources; problematic implementation inadequate scoping of the policy problem, inadequate planning, poor policy design,



resources shortfall, mismanagement and dichotomy between policy formation and policy implementation (Stone et al 2001:9). Broad surveys of the policy literature undertaken by Sutton and Stone on behalf of the Overseas Development Institute (ODI, Britain's leading independent think-tank on international development and humanitarian issues) suggest potential benefit in cross disciplinary sharing of approaches and intelligence on the problematisation of the policy process. (Sutton, 1999, Stone et al, 2001).

The review of the literature has shown that explicit consideration of *policy design* has a low visibility in critiques of the policy process. Neither have there been many references about mechanisms for overall management of the policy process or about formal mechanisms for monitoring, pause and correction from outside the process when problems emerge. Further, the review of the literature has shown that the policy process is typically open ended and unevaluated. In the spirit of the need for sharing the approaches offered by different disciplines, commented upon above, I would suggest that the design of policy initiative particularly in respect of policy design to learn much from 'systems thinking' approaches. This is suggested because in contrast to the policy process, a 'systems thinking' model offers a conceptual framework by which to understand and plan complex scenarios. Systems thinking conceives of its activities as being subject to 'disturbance' from the environment, having the propensity to fail, and having ineffective components. Many of the features it could be argued consistent with the policy process. Systems thinking counter these potential problems by requiring that certain components be included in the overall framework – the purpose of which is to anticipate and prevent failure. Such components include: effective

communication; a decision making subsystem supported by other operational and monitoring sub-systems; and require the definition of components and boundaries. It can plausibly be argued that many features of systems thinking are entirely relevant to the policy process, and indeed provide the opportunity for the application of an alternative conceptual approach to provide more productive understanding of cause and effect when planned-for objectives of policy activity are not achieved. Conversely, systems thinking also offers the prospect of a critical and productive approach to policy planning.

### *Commentary*

In this chapter I have drawn attention to the disparity between representations of the policy process frequently found in the literature, and other bodies of literature which draw attention to the deeply problematic nature of the policy process and a frequent propensity for outcomes to fall short of objectives. The chapter provided an overview of concepts and issues relevant to the policy process identified by researchers. Finally I offered a number of observations which may have the potential for improving the policy process.

## Chapter 4

### METHODOLOGY

#### 4.1 Research questions

The aim of the study is to provide a narrative and analytical history of the academic benchmarking initiative in order to contribute to theoretical debates on policy.

The dissertation takes the form of a policy trajectory study (Maguire and Ball 1994). Ball suggests that the policy trajectory research strategy holds out the prospect of a full and well rounded understanding of the policy process and its outcomes (Ball, 1994:10). The methodology adopted is judged appropriate to trace the progress of the benchmarking initiative from the point at which intentions were identified and the developments which then followed, ie interpretation, contestation, compromise and restatement. And also to trace the impact of external developments upon the policy, emanating from, amongst other things, changes in the policy environment.

The research questions which guided the study are therefore about policy purpose, policy process and actors roles within the policy process. The research questions are set out in chapter 1 and are repeated here.

1. To what extent was there unanimity or diversity about *policy intentions* at different treads of the policy development stair case
2. To what extent was there unanimity or diversity in *policy development* at different rungs of the staircase

3. What explanations can be found for the divergence between policy intentions and policy outcomes
4. What new critical insights about models of policy formation and policy development can be deduced from the study.

The points of reference which informed the study are discussed in chapter 1 and can be summarised as follows.

- the relationship between the government and Higher Education
- conceptualisations of the policy process,
- the role of discourse in the development of policy agendas.

### *Research strategies*

The pragmatic paradigm was deemed to provide a philosophical framework appropriate for the study, in that it provides for mixed method research. The paradigm rejects the scientific notion that social science inquiry must concern itself for a quest for 'truth' through the use of a single scientific approach, rather it emphasises the importance of practicality and common sense, and permits "projects to be undertaken without the need to identify invariant prior knowledges, laws or rules governing what is recognised as 'true' or valid'. Only results count" (Tashakkori and Teddie, 2003:85 quoted in Mertens, 2004:27). Epistemologically, the pragmatic paradigm permits the researcher to study what is most pertinent rather than requiring him or her to adopt a particular position, such as that of an objective observer, for example, and holds that the criterion for judging the appropriateness of the methods is if it achieves its objectives. "The ultimate goal of any research project is to answer the questions that were set forth at the project's beginning. Mixed methods are

useful if they provide better opportunities for answering our research questions”. (Tashakkori and Teddlie, 2002:14).

The instruments and procedures adopted to answer the research questions included qualitative data in the form of published texts, face to face in-depth interviews, and quantitative data derived from questionnaires. The qualitative and quantitative data were separately analysed and themes which emerged provided a basis for interrogation, comparison and contrast. Thus the use of mixed methods provided the opportunities for a more insightful understanding of key features within the policy process which influenced its outcome.

## **4.2 Research design**

The research design is a policy trajectory study and borrows the metaphor of a staircase from Reynolds and Saunders’ implementation staircase to plot the progress of the trajectory. (Reynolds and Saunders, 1985:195). However, the way the metaphor of a staircase is used here and the way it was used in Reynolds and Saunders’ original study is quite different. In their study the authors were concerned with an idealised representation of the way policy statements were used at different stages of the policy process. To that end they examined the roles of policy users along the ‘implementation staircase’: from policy image development through to classroom adaptation. Their principle concern was to explain teachers’ strategic conduct in the implementation of curriculum policies. The model therefore focused on social actors but it took limited account of other features which can impact on the policy process, such as resource constraints, conflicting ideologies, bureaucratic obstacles,

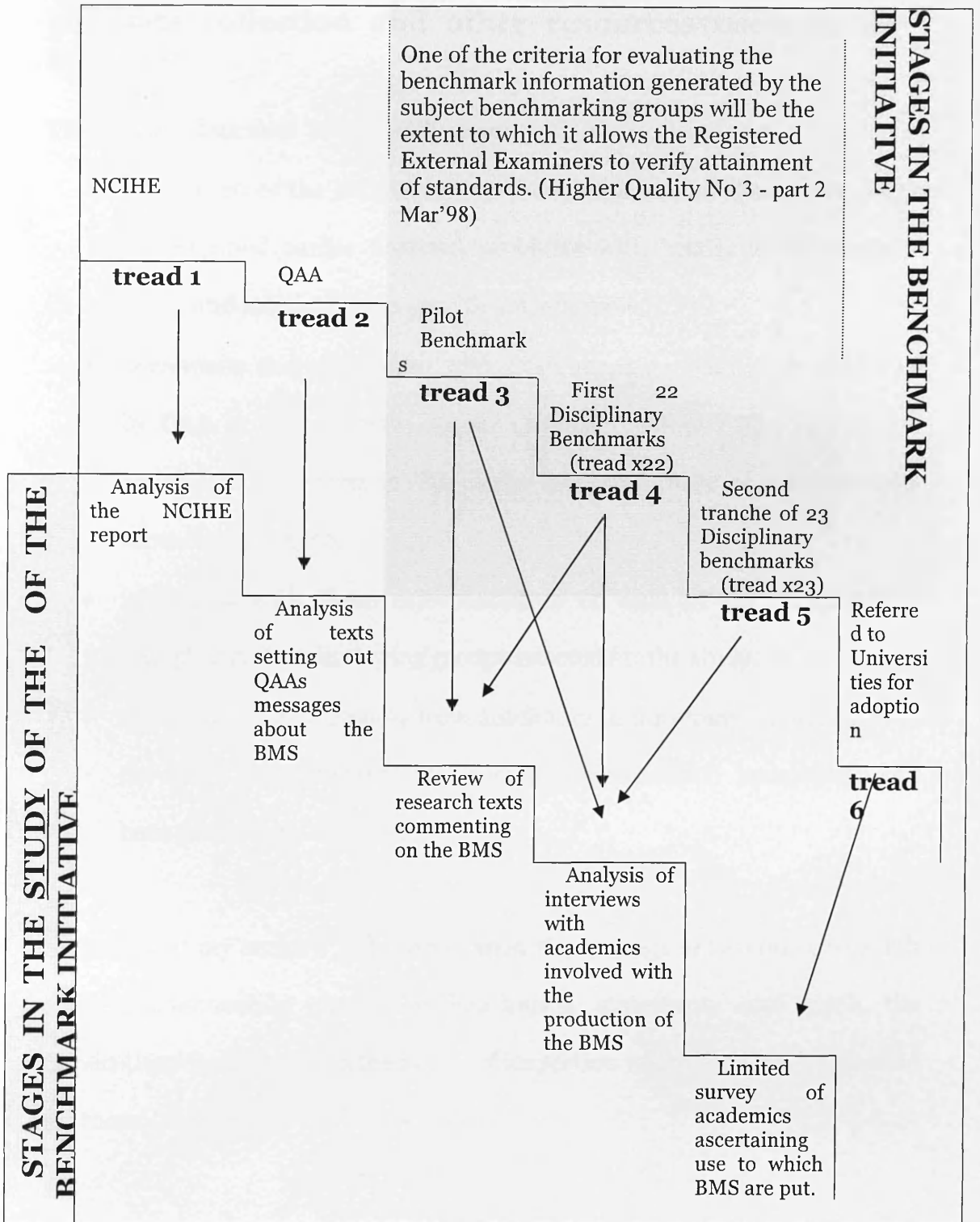
ambiguity about the nature and implication of the tasks set out in the policy formulation stage. Importantly, the implementation staircase may be taken to assume that policy proceeds in well ordered stages. That assumption is not carried forward in this study. Indeed, in some parts of the benchmarking policy process there was tension and compromise both between and within different parts of the policy trajectory. Whilst the policy staircase therefore has only limited alignment with this trajectory study it is helpful in offering an organisational device. It helps to locate specific developments with their different actors, resources and ideologies, through the benchmarking initiative.

I have used the staircase metaphor in two different ways in the research design:

- to mark stages in the progression of the **policy** and
- to mark the stages in the progression of the **study**.

The treads are not always synonymous, but each tread on the progression of the policy has a clear relationship with a tread in the progression of the trajectory study.

The diagramme overleaf exemplifies the above.



**Fig 4 The Policy trajectory utilising the Staircase metaphor demonstrating:**

*the development of the academic benchmarking initiative  
the stages in the study which correspond to each of the stages in the academic benchmarking initiative. After Reynolds and Saunders.*

### **4.3 Data collection and other resources used in the research**

The primary data used in this study were:

- Chapter 10 of the NCIHE report *Qualifications and Standards*, which as described earlier depicted problems with academic standards in HEI's and recommended specific remediation.
- documents and statements about the benchmark initiative published by QAA in their bulletin *Higher Quality*, together with articles and statements appearing in the media including those of commentators other than the QAA
- interviews with three representatives of each of the sample of 6 disciplinary benchmarking groups selected for the study.
- completed questionnaires from academics in university departments in the same 6 disciplinary areas, about the use to which benchmarks had been put in their department.

To support my analysis I also drew upon the findings of two other research studies, commenting upon the benchmark statements and upon the implications for their use in the model of inspection which the QAA had trailed for them. (Jackson, 2000) (Yorke, 2001).

#### *Chapter 10 of the NCIHE report Qualifications and Standards*

Chapter 10 of the NCIHE report sets out the policy intention. It represents a potent example of the discourse on academic standards at the time that the benchmarking initiative was instigated. It presents a particular version of the stewardship of academic standards in HEIs and the way things were at that



time. Hence it both sets the context for the way the policy development and contextualises this study.

*Documents and statements about the benchmark initiative*

A particular interest explored in this study is the shifts and modifications of the policy and its stated intention. This was explored through examination of texts, primarily those published by the QAA.

*Interviews with representatives of each of the sample of 6 disciplinary benchmarking groups selected for the study*

One data set comprises interviews with members of the benchmark groups. The interviews sought to provide insights into the policy process from the perspective of a sample of the disciplinary benchmarking groups, but also provided the opportunity by which to examine the constructions and language used by this group of participants. So that as well as *looking for* the answers to specific questions, I was also *looking at* the ways the responses from academics involved in the policy process were constructed.

Three respondents from each of the six benchmarking group were selected for the interviews: the chair, an academic from a pre-1992 university and an academic from either an ex-polytechnic or from a college of higher education. The selection of these categories sought to ensure a spread of institutional perspectives. I used a prepared set of prompts to support the interviews.

From my own position as a senior officer in a number of different HEIs over a 20 year period, I have witnessed the acceleration of the quality assurance and accountability agenda via a raft of policy initiatives. In terms of the NCIHE report, I was struck in particular by the simplistic construction of academic standards in chapter 10, a concept which the committee did not define, but rather equated with what employers wanted from new graduate employees. (Note more recently, this same concern is uppermost in the *Burgess Report*). It appeared to me that the presentations of deficit in the report whilst not attributed explicitly, appeared to have employer views at their centre and that the committee privileged a particular view about what graduates should be able to offer to their prospective employers. These views translated in the recommendation to define the threshold knowledge and skills possessed by a graduate. Perhaps an analogy can be drawn between the threshold requirements of a prospective employee and the minimum requirements of a component for the production line. There is, in my own experience a dramatic difference in this view of the individual at the end of her university career, presented in the report and the view which prevails in final examination boards in universities where classifications are awarded (and in theory where judgements about threshold attainment are made). In the setting of the final examination board, academic members seek to evaluate: the intellectual strengths of an individual candidate; her capacity to execute some areas of the discipline well, and others less well, the counter balances of those strengths and weaknesses; the journey she has made, the commitment and effort she has shown in respect of her studies and her ability to deploy her intellectual capital effectively.

I was aware of these ideological differences in preparing for the interviews with academic colleagues. I focused however, on the matter of academic standards and the way that had been conveyed as an issue in the report; on the clarity or otherwise, as to the task which had been assigned to the disciplinary benchmarking groups (it seemed to me that these features were symbolic of the extent to which there was appropriate knowledge and understanding in the committee to discharge their task) and the perceptions of members as to the dimensions and character of the problem which their recommendations were to 'fix'. The slipperiness of the concept and the specificity (or otherwise) of the task relating to standards might mark the territory on which contestation would be played out between the pronouncements in the NCIHE report, and carried forward by QAA, and the work of the disciplinary benchmarking groups. I believed a focus in the interviews on these features of the policy initiative would be productive in drawing comment from academic colleagues on a wide range of matters relevant to the study, and were hence central to the interviews conducted with academics on the benchmarking groups.

The interviews were semi-structured, between one and two hours duration and face to face. They were recorded electronically. Respondents were encouraged, with prompting, to give their own account of their personal experience as a member of the benchmarking panel, the processes adopted and on their own attitudes and values. They were asked to try and reflect in their responses their perspectives at the time and also to reflect on the undertaking in hindsight.

*Justification for the selection of benchmarks for inclusion within the study*

Of the benchmark statements which had been produced at the conclusion of the second tranche of benchmarks I selected 6 benchmarks for study. The selection was based on the following criteria:

- subject benchmarks from ‘academic’ rather than ‘vocational’ disciplines, and from both humanities and from scientific disciplines
- subject benchmarks from each of the three phases of the development. (pilot phase; first tranche ; second tranche)
- and exclusion of:
- benchmarks for those vocational subjects concerned primarily as a preparation for work.

Becher and Trowler note that the HE Curriculum is becoming more vocationally oriented (2001:3). However, the point has already been made that there is contestation in some quarters of the sector about increasing government pressure on universities to contribute more explicitly to economic reproduction in the capitalist state. The choice of subjects for this study which are essentially academic disciplines rather than subjects which might be described as training, vocational or as preparation for work is deliberate since academic disciplines: the hard sciences at one end of the continuum and the humanities at the other, can be seen to represent more strongly traditional university values about academic autonomy and education as a good as of itself and hence this is where the contestation between HE and the state will be in greatest relief. Young argues that there are areas of academic knowledge which involve assumptions that such areas are much more ‘worthwhile’ than

others, and are viewed as 'high status' (Young, 1971:34). To quote directly from Young: "If the criteria of high-status knowledge are associated with the value of the dominant interest groups, particularly the universities, one would expect maximum resistance to any change of the high status knowledge associated with academic curricula (Young, 1971: 36).

The idea of some subjects having greater academic autonomy than others is commented upon by Silver and Brennan using concepts such as 'worthwhile' and 'high status' similar to those used by Young but applied in the context of their application to future employability. They arrive at a similar position arguing that some subjects have different 'currencies'. They use the phrase '*subjects with a loose connection with subsequent employment*' in their model of "the different kinds of currency which degree qualifications can possess in the labour market" (Silver and Brennan, 1988 : 34-52). As suggested by Young one would expect these disciplinary areas to exhibit greater resistance to external influence than will other newer, applied, or technological disciplines. So whilst the subjects selected are not representative of the benchmarks identified for the whole initiative, they are representative of a persistent and strongly held HE ideology intrinsic to the idea of the academy.

I have provided further amplification of the concept of 'loose connection to subsequent employment' later in this chapter where I define and discuss a number of terms important to this study. On the basis of the foregoing I selected the following benchmarks as those which would be selected:

- History (pilot phase)
- Chemistry (pilot phase)
- English (first tranche)
- Theology and Religious Studies (first tranche)
- Biosciences (second tranche)
- Physics (second tranche)

An alternative to the above might have been selection of subjects based on different criteria, for example, based on disciplinary dimensions, such as those put forward by Becher and Trowler ie: Pure Sciences; Humanities; Technologies; Applied Social Science (Becher and Trowler, 2001:36). Such a selection would have yielded an understanding of how disciplinary communities with particular academic cultures and characteristics responded to the benchmark initiative, and might also have been expected to reveal answers to the specific questions identified for this study. Use of these disciplinary dimensions would therefore have provided information relevant to the study, but would also have provided much data beside redundant in terms of the research questions.

Whilst I assert that the disciplinary dimensions most relevant and appropriate to this dissertation are those which are at the academic end of the academic/vocational continuum, in fact, selection was constrained by the benchmark dimensions imposed by the QAA. So that whilst Mathematics might have been an appropriate candidate for inclusion, its association with other practically oriented subjects (Mathematics, Statistics and Operational Research) made its selection problematic in the terms of the criteria set out earlier.

### *Questionnaires from academics in university departments*

Questionnaires were constructed and sent to staff in university departments offering programmes in the same disciplinary areas selected for the study. This data set sought to ascertain the extent to which the benchmarks in those disciplinary areas were being drawn upon in universities. The questionnaire also sought to discover if, in the opinion of practicing academics, the benchmarks fulfilled the original intention identified for them by the NCIHE and more generally, the value that academics in practice placed upon them.

### *Other resources drawn upon*

These data are supplemented by contemporaneous texts. In particular, two research papers published on the (former) LTSN Generic Centre website following the publication of the first 22 statements. Their status in this study is distinctive. They provide detailed, independent and authoritative corroboration as to claims made in this study about the considerable diversity between the statements produced by the benchmarking initiative and their divergence from the intentions set out in policy intentions.

Other information intended to provide context was also collected. Thus, the member of QAA staff with responsibility for leading the benchmark statements initiative was invited to comment how in 2002 (the time of the interview), the QAA viewed the initiative, in comparison with the view held at the launch of the initiative in 1998.

## 4.4 Analytical design and organisation

The methods of analysis used were mixed. I selected methods which offered the greatest utility to address the research questions. In the following sections I set out my analytical approach in each of the treads of the analysis

### ***Tread 1: Chapter 10 of the Report of the National Committee of Inquiry into HE***

*"..key areas of social life (such as politics) have become increasingly centred upon the mass media, and those involved in these areas have consequently become increasingly self-conscious about the language they use. These changes have become increased in conscious interventions to shape linguistic and semiotic elements of social practices in accordance with economic, organisational and political objectives (Fairclough, 1999:vii).*

I selected chapter 10 since it is this chapter which describes what the committee considered were the problems with academic standards in HEIs and which also set out in Recommendation 25, the Committee's remedy, and the genesis of the Benchmarking initiative. I elected to undertake a close and analytical reading of the text of chapter 10 adopting a critical approach.

In undertaking this scrutiny I was particularly interested in the language used in the text and, as Fairclough says its use to shape political objectives. To this end I also drew upon other respected authorities on the use of language and discourse in social representations. The membership of the Committee had some relevance in this context in terms of representation on it of highly successful commercial organisations. (See Fig 5: *Members of the National Committee of Inquiry into Higher Education*).



Fran Tonkiss comments upon Foucault's contribution to the role of language which has specific resonance with claims being made in this study about the NCIHE report:

*"Foucault used documentary evidence in a distinctive way. His approach was backed by a theoretical understanding of discourse as a realm in which institutions, norms, forms of subjectivity and social practices are constituted and made to appear natural...Foucault's accounts go further to ask: how are these discursive constructions linked to the shaping of social institutions and practices of social regulation and control " (Tonkiss, 1998:246-255).*

These perspectives then influenced my reading of chapter 10 of the NICHE report, and encouraged examination of its construction and the meaning and intentions behind the statements contained within it.

My reading identified a number of key themes which included: linguistic features; presentation of specific shortcomings and overall balance and focus of the chapter in terms of what weight it gave to the different issues it reported upon. As well as what chapter 10 says, what it does not say was also of interest to this dissertation. For example although the chapter is about standards, that concept is not defined nor is it clear what the shared understanding of that concept is among members drawn from such a variety of backgrounds (see Fig 5 below). There are silences too about the practical translation of recommendation 25.

A close analytical reading of chapter 10 was appropriate to my frames of reference, set out in chapter one, and my interest in policy as site of contestation between the state and higher education. A scrutiny of discourse

as a tool of knowledge and power, appeared to offer the greatest utility to answer the research questions set out in chapter 1.

Alternative forms of scrutiny such as content analysis were rejected on the basis that that method would not reveal the strategies of argument and the skilful use of language deployed in chapter 10 of the report.

**Fig 5 Members of the National Committee of Inquiry into Higher Education**

<b>Member</b>	<b>Status</b>	<b>Type of organisation</b>
Prof John Arbuthnott	Principal and Vice-Chancellor of the University of Strathclyde	HE (redbrick)
Baroness Dean of Thornton-le-Fylde	(formerly Brenda Dean)	Trade Union
Sir Ron Dearing	(Chairman)	Post Office
Ms Judith Evans	Departmental Director of Personnel Policy, Sainsbury's	Retail
Sir Ron Garrick	Managing Director and Chief Executive of Weir Group	Engineering
Sir Geoffrey Holland	Vice-Chancellor of the University of Exeter	HE (redbrick)
Professor Diana Laurillard	Pro Vice-Chancellor (Technology Development) of the Open University	HE (redbrick)
Mrs Pamela Morris	Headteacher, The Blue School, Wells	Secondary Education
Sir Ronald Oxburgh	Rector of Imperial College of Science, Technology and Medicine	HE (elite)
Dr David Potter	Chairman of Psion plc	Computing products
Sir George Quigley	Chairman of Ulster Bank	Banking
Sir William Stubbs	Rector of the London Institute	HE (redbrick)
Sir Richard Sykes	Chairman and Chief Executive of Glaxo Wellcome plc	Pharmaceuticals
Professor David Watson	Director of the University of Brighton	HE (new)
Prof Sir David Weatherall	Regius Professor of Medicine at the University of Oxford	HE (elite)
Professor Adrian Webb	Vice-Chancellor of the University of Glamorgan	HE (new)
Mr Simon Wright	Academic Affairs Officer, Students Union, t University of Wales College of Cardiff	HE (student member) (new)

## ***Tread 2: QAA receives the policy intention and sets up the pilot phase of the benchmarking initiative***

This part of the research design concerned itself with QAA receiving the policy intention from the NCIHE, and about the Agency's subsequent attempts to pin down what in their own words was a "relatively ill-defined task" (QAA March 98 para 12). As in tread one, I was interested in the silences about what a benchmark in the context of an academic discipline was, what one should look like, and how the disciplinary groups should approach their task.

The selection of material used for tread two was, as in tread one, primarily text based, drawn from the Agency's own journal, *Higher Quality*, from 1997 to the present day, and from articles in the national press and the THES. To a lesser extent it also included presentations and speeches made by QAA directorate at various conferences for the sector throughout this period. The selection of these texts was based on their relevance to the benchmarking initiative and to the research questions set out earlier.

Examination of the data was iterative. It commenced with reading and re-reading the material, keeping a close focus on the aims of the project, the theoretical framework and the findings the analytical reading of chapter 10 NCIHE report *Qualifications and Standards*. I was interested in the way particular matters were presented in strategically different ways at different times. The themes that were identified for scrutiny of the texts were, *inter alia*:

- character: what the texts said, at different points in time, about what an academic benchmarking statement was ;
- purpose: what the texts said at different points in time about what the academic benchmarking statement were for and the use to which they would be put;
- benefits: what value the initiative was intended to confer and who were the beneficiaries;
- method: what the texts said, at different times about how the task should be approached;
- issues: what problems the initiative sought to overcome;
- culture: conflicting values and perspectives discernible at: the NCIHE/QAA interface the QAA/ benchmark groups interface
- dissonances: eg unresolved questions relating to the initiative.

A particular focus of my examination of the data for this part of the analysis was a search for instances of 'position shifting'. An interest in this part of the analysis was to look at the way in which different explanations were presented at different moments in time.

### ***Review of other researchers' comments on the benchmark statements***

The analysis was augmented by a review of two studies published on the (former) LTSN Generic Centre Website in June 2001. These studies each provided an analyses of the first tranche of 22 benchmarks. Each study had demonstrated variability between the benchmarks and had raised questions as to the extent the benchmarks had achieved the policy intentions, and the

extent of their reliability were they to be put to the use which QAA had identified for them. Evaluation of these research papers (Jackson, 2000) and (Yorke, 2001) was helpful in confirming the authority of the findings as to the variation in the development of the benchmarks proposed in this study.

***Treads 3, 4 and 5: the views of those involved in the production of the benchmark statements: interviewing and analysis of the interview scripts***

In this part of the study I concerned myself with the interviews conducted with individuals selected from each of the benchmarking groups sampled for the study.

In conducting the interviews, I was interested to learn from those involved in the production of the statements their views on the initiative, inviting them to reflect on their experiences at the time and also in hindsight. I was particularly interested to learn for example:

- their perception of the policy intention generally;
- their perception of the clarity of the policy intention; their perception on the relative ease/difficulty in reaching a consensus within the group about the task and the groups' approach to it;
- what had been their own motives for participating in the benchmark initiative;
- whether, in their personal view, the subject benchmarking information had "enabled subject threshold standards to be established" (Randall, 1997:2).

Analysis of the interview scripts sought to discover what each of the respondents had said. The data was searched manually initially. Manual searching and coding sought to foster a close understanding of the data.

I searched for representations and shared depictions of issues identifiable in the transcripts as a whole. I was interested in what such representations might denote, for example in terms of respondents attitude to the benchmarking task and representations of shared values. I was conscious in this search of the different interpretive contexts within which the policy had been a) formulated and b) referred, ie the interpretive context of the Dearing Committee with one set of values and concerns and its reception in a different interpretive context of the 'small expert teams' (NCIHE, 1997: rec 25) of senior academics selected to progress the recommendation with their own distinctive (and multiple) sets of values and concerns. It was at that interface where there might be expected to be discernible reaction to the presentation of academic standards as portrayed in chapter 10 of the NCIHE report, and I was alert to the language and discursive repertoires employed by academic colleagues in the benchmarking groups on this point. I was also alert to echoes which might denote 'resistance to any change', as suggested by Young to be particularly prevalent in those areas of the academy associated with 'high status knowledge' (Young, 1971: 34-36).

I was also conscious of how respondents' comments might reflect their perception about the interpretive context in which their responses might be viewed at some future point in time following the publication of the thesis..

To support the analysis I drew up coding sheets. The word processed interview transcripts were put into the format required by NUD\*IST, and the codes applied.

From the initial codes, a number of further themes emerged, arising from revelations provided by close scrutiny. There was therefore both an expansion and a rationalisation of the codes as the analysis progressed.

NUD\*IST was 'told' for each interview: the relevant benchmark, whether it was from the pilot, first tranche, or the second tranche, whether the respondent was a chair, a representative of an old or of a new university. This process, repeated several times, allowed the interview data to be 'chunked' and organised. Particular themes emerged from this process which helped towards organisation of the analysis.

### ***Tread 6: implementation***

In this final part of the trajectory study, I was interested to undertake a preliminary exploration into the use to which the benchmark statements were being put in HEIs. To this end I undertook a limited e-mail survey of academics in the same disciplinary areas as my original interviews in a number of institutions across the UK. The survey was undertaken in August and September 05. It was conducted by e-mail. The initial response was poor and the questionnaire was sent out a second time by e-mail to the same respondents. In total 6 responses were received in response to 60 e-mail requests, each of which had been administered twice. Two of those responses consisted of a decline to complete the questionnaire, however, the comments made by these two respondents are themselves of interest in the context of

the survey and are shown separately in Chapter 5 Data Presentation, Analysis and Findings. I administered the questionnaire a third time, this time by post completely anonymised. This was because one of the respondents in the first tranche of e-mailed responses had suggested some anxiety about anonymity, a feature not possible in the e-mailed survey. Nine responses were received in response to the posted questionnaire.

The results are intended to be indicative rather than conclusive however, they did contribute to the research question: “What explanations can be found for the divergence between policy intentions and policy outcomes”. However no claims are made for this part of the study, beyond being of interest in the context of the original idea of the policy trajectory.



## **4.5 Research design and method: critical reflection on shortcomings**

### **Analytical Reading of Chapter 10 of the NCIHE report**

The reading of chapter 10 of the NCIHE is deliberately critical however, that it is separated out from the totality of the report may mean that its messages are decontextualised from the overarching message conveyed by the report. This section may also have been improved by a utilisation of a more formal method of analysis such as discourse analysis. The skills for which were not available to the study.

### **Selection of benchmarks**

The selection of the benchmarks has been argued for. Ideally, the selection would have been augmented by a set of benchmarks associated with disciplinary areas of a vocational nature. This would have given greater authority to the claim that some subjects have a different 'value' to use Young's words. Such a 'control group' might have been expected to have supported the claim that resistance to change can be expected to be greatest in those disciplines which are more academic and less vocational (Young 1971: 34-36).

### **Selection of representatives on the benchmarking groups**

The selection of three academics from each of the sample of benchmarks sought to ensure that all perspectives relevant to the research questions were

represented. That is, the chair from each group was interviewed, and the other interviewees were representatives from traditional pre-1992 universities and the third representative was from a post '92 university or from a HEI without university status. The reliability of the data would have been enhanced had all of the members been interviewed.

## **Questionnaire**

An issue with the questionnaire was its low response rate. The result of this part of the research design cannot therefore offer reliability.

## **4.6 Concepts**

A number of concepts have particular importance for this study and deserve further discussion:

### ***Academic standards:***

By this term I mean to convey the intellectual demand on students in their execution of assessment tasks, and the judgement of tutors as to the achievement of students in those assessments. The definition of the Graduate Standards Programme holds good: "explicit levels of academic attainment that are used to describe and measure academic requirements and achievements of individual students and groups of students". (HEQC, 1996:4).

### ***Subjects with a loose connection to subsequent employment:***

This term was coined by Silver and Brennan in their model of "the different kinds of currency which degree qualifications can possess in the labour market". They describe what they mean by 'a loose connection to subsequent employment'. "Courses of this type will be designed in relation to educational

considerations. Teachers will have little or no experience of non-academic work and may have very little knowledge of what their graduates actually do after leaving higher education. Until they leave students may also have little idea of what they will do". These courses can be seen to be "non-specific with a relatively open relationship with employers" (Silver and Brennan, 1988:35-40).

Silver and Brennan draw on Burnhill and McPherson's (1983) study which suggests that universities engage in five sorts of 'vocational preparation'.

1. Preparation for employment in the subject disciplines themselves
2. The vocational preparation of professionals 'explicit, purposive and planned in relation to a segment of the labour market'.
3. Vocational preparation by the non-professional faculties with a 'largely fortuitous' connection with the requirements of employers, ie students have to make connections between the specifics of their courses and the labour market.
4. A form of vocational preparation 'characterised by the "generalisability" of skills and fundamental, theoretically mastered knowledge'.
5. A form of general preparation which sees the graduate as 'a person with a set of values, skills, personal dispositions and habits of thought that make him or her valuable to employers irrespective of the particular contents of the university courses followed' (Burnhill and Mc Pherson, 1983).

Silver and Brennan identified a typology showing a descending order of specificity and explicitness in the design and presentation of courses. At the top end, courses share the initial preparation of graduates and academic autonomy over the content of the curriculum with professional bodies. Academic autonomy will therefore be limited by professional body control and regulation. At the lower end of the typology, and of most interest to this project, courses share a loose connection with subsequent employment. The content and presentation of courses will not have been constrained by professional body concerns and academics will have had full latitude as to content of the curriculum. As stated earlier these subjects, mainly the humanities and pure sciences are likely to be particularly illuminating in their response to the academic benchmark initiative.

### *Commentary*

In this chapter I have set out the parameters of the research undertaken, identified the research questions, the data to be drawn upon, and set out the research design and its rationale. I have sought in particular to argue the reasons for the selection of the benchmarks used in the study, and for the respondents interviewed. I have set out the methods of analysis to be used and the reasons for the adoption of those methods. I have also identified the stages of the analysis and accounted for some of the choices made. I have acknowledged some shortcomings in the research design and methodology. Finally I have defined some terms important to the research.

## Chapter 5

### DATA, ANALYSES AND PRESENTATION OF FINDINGS: KEY MOMENTS IN THE POLICY PROCESS

The selective review of literature set out in chapter 3 has shown the representation of the policy process as rational and linear masks the actual experience of policy. The literature has revealed that there is typically: complexity and ambiguity; involvement of a wide range of participants with differing perspectives; issues of policy design; issues of policy management; not infrequently culminating in discontinuity between the objectives of the policy and the actions eventually put into effect.

In order to learn more about the academic benchmarking initiative, I was interested to explore the key influential moments within its own distinctive policy process. To this end the analysis in this chapter is organised in sections designed to reveal:

- 1 the way the Dearing Report had represented higher education's stewardship of academic standards at the end of the 1990s. For this I undertook a close critical reading of chapter 10 *Qualifications and Standards*, which contained recommendation 25, the genesis of the academic benchmarking policy. I was interested in the impressions promoted in that chapter to contextualise recommendation 25 and in the linguistic devices employed to construct the impressions conveyed.
- 2 how the QAA had interpreted recommendation 25 'to provide benchmark information on standards, in particular threshold

standards', referred to it by the NCIHE. How in turn, the Agency had translated that recommendation into a task for the benchmark groups.

- 3 how the representatives of the benchmarking groups selected for this study had received and responded to the initiative.
- 4 the views of a sample of academic colleagues in universities as to the
- 5 impact of the benchmark statements.

The rest of this chapter is organised in sections, dealing with each of the above matters.

## **5.1 The NICHE Report : policy formulation - the genesis of the academic benchmarking initiative**

*In any society the production of discourse is at once controlled, selected, organised and redistributed according to a number of procedures whose role is to avert its powers and its dangers, to master the unpredictable event (Foucault, 1981:53, in Ball , 1990: 22)*

In chapter 3 I drew attention to the idea of discourse development (Foucault, 1972:8; Shore and Wright, 1997:3-34; Carabine, 2001:68) which serve to coalesce groups of ideas and explanatory accounts to give meaning to specific phenomena, but which can also filter meaning to privilege the interests of one faction over another. These discourses appear to present an issue in a neutral way and to marginalise alternative views. As I discuss in chapter 3, according to these theories, discourse development can be seen as shaping the way in which a particular matter is perceived by wider audiences, helping to ensure that it reaches the political agenda. The 'shaping' referred to above is inevitably the product of the views of particular factions. In this context, it is

useful to note that the predominance in the Dearing Committee membership of very senior staff of successful commercial organisations. (See Fig 5: *Members of the National Committee of Inquiry into Higher Education*).

One might expect, from this account that once a particular issue had reached the political agenda, the incidence of the discourse would subside. And indeed, it would appear that the NCIHE report was the high point of the academic standards discourse and subsequently diminished. The academic standards discourse can be seen as emblematic of the relationship between the state and HE, at that time, promoting a particular version of reality which served the interests of the state as they relate to capital accumulation, as identified by Dale (1991:9) and quoted in chapter 3.

It is within the above context of development of the academic standards discourse that the following close scrutiny of chapter 10 the NCIHE report was undertaken.

Chapter 10 of the NCIHE report is predominantly devoted to the description of the planned developments which it purports to be necessary to remedy the shortcomings it constructs and reports upon.

There are four recommendations in chapter 10. Two relate to the inception and responsibility of the new Quality Assurance Agency and two relate to the standards of awards. (The focus – on *standards* and on *awards* – becomes an important feature of the policy trajectory and is returned to later in this study). The following concerns itself with the recommendation relating to the standard of awards. The first of these, recommendation 23, is an eminently practical organisation of commonly available qualifications provided by HEIs

in the UK within a ‘qualifications framework’, whereby descriptors would be assigned to the various levels of those qualifications. The second recommendation, 25 and the topic of this study, concerned the development of “benchmark information on standards”. Whilst the ‘qualifications framework’ recommendation 23 was accomplished with relative ease following debate as to the level to which the unclassified degree should be assigned, the conceptually slippery recommendation relating to academic benchmarking was fraught with difficulties.

An examination of the 102 paragraphs which make up chapter 10, shows that they can be grouped as follows:

<b>Group</b>	<b>No of paras on this topic</b>	<b>Topic of paragraphs</b>
1	11	paragraphs are factual/neutral
2	21	paragraphs set out criticisms of current HE practice
3	10	paragraphs set out proposals for change contextualised by reference to the criticisms
4	35	paragraphs and a diagram describe proposals for the development of a qualifications framework
5	2	<b>paragraphs set out requirements for the development of benchmark information</b>
6	15	paragraphs describe the role of the Quality Assurance Agency

On the issue of problematic and unproblematic policy projects, it should be noted from the above table that the policy relating to development of the qualifications framework occupied almost 35% of chapter 10 whilst only 2% of the chapter was devoted to the development of the conceptually ambiguous ‘benchmark information on standards’.

Barkenbus, in the quotation included in chapter 3, links the degree of specificity in policy objectives with the degree of success of implementation



plans, an enhanced degree of specificity being more likely to have transparency and predictable outcomes (Barkenbus, 1998:1-10).

The rest of this section of chapter 5 is devoted to the results of the close analytical reading of chapter 10.

The four tables below include selected statements from chapter 10 grouped as follows:

- statements or inferences that academic standards are unsatisfactory (table 5.1)
- statements or inferences that imply opacity and inconsistency about the standards of awards (table 5.2)
- remedies for the implied shortcomings, as if those shortcomings were actual rather than alleged (table 5.3)
- statements which 1) allege current practices are leading to decline in standards and 2) propose that state directed intervention is necessary to recover that decline. (table 5.4).

The purpose of these tables of extracts is to cast light on NCIHE chapter 10 *Qualifications and Standards* to demonstrate the mechanisms employed to convey certain impressions about higher education's stewardship of academic standards, and to reveal the detail of some of the constructions used. And also to contrast some of those statements with others that acknowledge that the basis for the assertions is based on the opinion of particular audiences rather than on evidence. The tables taken together also provide an insight into the world-view of the authors of the NCIHE report.

<b>TABLE 5.1 Extract of statements in chapter 10 which state or imply that standards are unsatisfactory</b>
Existing arrangements for safeguarding standards are insufficiently clear to carry conviction with <b>those who perceive present quality and standards to be unsatisfactory.</b> 10.2
There is <b>national concern about the maintenance of standards of achievement</b> at all levels of education..10.54
<b>There is similar concern about the standard</b> required for the award of higher education <b>degrees.</b> 10.55
Given the large increase in the number of students taking degrees over the last 20 years, and a marked rise in the proportion awarded First or Upper Second class honours, <b>many think that it is not plausible to say that standards have not declined</b> 10.55
<b>We have not attempted to make an independent investigation of the standards of degrees and the evidence we received did not provide a firm base on which to conclude whether they have fallen over time. Nevertheless, we are sensitive to the public concern that exists about standards and to the significant body of opinion in higher education which holds that, at the broad subject level, little precise comparability of standards exists, except perhaps where there is an external validating or accrediting body.</b> 10.57
From the evidence put to us, it appears that <b>the need for these threshold standards is more urgent in some subjects than in others.</b> 10.65
As the practice of franchising has been expanding rapidly, <b>we have concerns that some further education institutions,</b> seeking to provide a wide range of options for students, may be extending themselves too broadly and entering into too many relationships <b>to be able to ensure quality and standards.</b> 10.74
We believe that in the interests of extending opportunity and encouraging lifelong learning, <b>franchising should continue,</b> but only on the strict understanding that it <b>must not prejudice the assurance of quality and maintenance of standards.</b> 10.76
We concluded that this situation had arisen as a result of a <b>'market system' operating</b> during a period of increased demand for postgraduate qualifications <b>without an adequate framework or control mechanism.</b> 10.11
If greater market influences were to be introduced <b>without an adequate framework or mechanisms to ensure the consistent use of titles</b> and corresponding level of award, <b>great damage could be done..</b> 10.12

One linguistic feature within chapter 10 and exemplified in Table 5.1 is: an assertion followed by extrapolation of that assertion. Statements have the construction “because this, then this’ and by this mechanism build a particular impression which is then further exaggerated by another overlaid suggestion to create an added dramatic impact:

### Example:

*We concluded that this situation had arisen as a result of a 'a market system' operating.....without adequate framework or control mechanism. (10.11)*

*If greater market influences were to be introduced without an adequate framework or mechanisms to ensure the consistent use of titles and level of award... (then) great damage could be done. (10.12).*

Another feature of the above is that the criticisms presented are un-attributed, other than to:

- 'the public';
- 'those who perceive';
- 'many think';
- 'those who have represented'.

In addition no evidential base is claimed for the assertions made in chapter 10. So whilst there is much use of suggestion in the extracts in the table to convey an impression of a particular failing by the sector, the ambiguous status of these assertions becomes evident when juxtaposed with statements in other parts of the chapter:

### Example

*1 "...diversity is not an excuse for low standards or unacceptable quality" 10.7*

*2 "...many think that it is not plausible to say that standards have not declined" 10.55*

*3 " We have not attempted to make an independent investigation of the standards of degrees and the evidence we received did not provide a firm base on which to conclude whether they have fallen over time". 10.57*

I propose that the features of unsupported assertions, innuendo and repetition evident in the above extracts are supportive of the theme of construction being argued for.

As well as low standards chapter 10 alleges inconsistency and lack of clarity about standards. The table below shows how this impression is built up.

<b>TABLE 5.2 Statements from chapter 10 which imply opacity and inconsistency about the standards of awards</b>
Students need to be <b>clear about the requirements of the programmes to which they are committed, and about the levels of achievement expected of them.</b> 10.2
Employers want <b>higher education to be more explicit</b> about what they can expect from candidates for jobs, whether they have worked at sub-degree, degree, or postgraduate level. 10.2
<b>Existing arrangements for safeguarding standards are insufficiently clear to carry conviction</b> with those who perceive present quality and standards to be unsatisfactory. 10.2
We believe <b>there is much to be gained by greater explicitness and clarity about standards and the levels of achievement</b> required for different awards.10.2
<b>The task facing higher education</b> is to reconcile that desirable diversity with achievement of <b>reasonable consistency in standards of awards.</b> 10.3
<b>This needs to incorporate a clarity of approach</b> which enables those inside and outside higher education to have <b>confidence in the effectiveness and fairness of the arrangements.</b> 10.3
At present, <b>there is no consistent rationale for the structure or nomenclature of awards across higher education.</b> Most substantively, at the postgraduate level, <b>the terms postgraduate diploma and certificate have little common meaning across institutions. There is considerable confusion about the ‘M’ (Masters) title.</b> 10.10
Not surprisingly, the Harris report on postgraduate education concluded that, although there had always been <b>diversity</b> in postgraduate titles, it <b>had reached the point of being unhelpful, and that in a number of cases it was positively misleading.</b> <sup>1</sup> We concluded that this situation had arisen as a result of a ‘market system’ operating during a period of increased demand for postgraduate qualifications without an adequate framework or control mechanism. 10.11
<b>The problem of</b> reliance on such a market system is that by the time the market has corrected the worst examples of <b>ambiguous standards,</b> damage may have been done to the whole sector. 10.11
A number of organisations have proposed the development of a framework <b>to provide clarity on levels of achievement</b> and to show the progression pathways for students. 10.15
We agree with those who have represented <b>the need for a framework of qualifications providing greater clarity to the meaning of awards at the higher levels,</b> and we have addressed the nature of a national framework. In so doing, we have considered:10.17

<p>This is a salutary warning for undergraduate education. If greater market influences were to be introduced <b>without an adequate framework or mechanisms to ensure the consistent use of titles and corresponding level of award, great damage could be done.</b> 10.12</p>
<p>At level H4, we believe that <b>the title ‘Honours’ should be clearly understood</b> to denote a level achieved in a single subject, a professional area or related subjects, which would include the existing combined honours programmes. 10.47</p>
<p>At the postgraduate level, <b>we have heard some concerns about the comparability and consistency of standards</b> of postgraduate programmes across the higher education sector. 10.59</p>
<p><b>We conclude that UK awards at all levels, and especially the first degree, must be nationally recognised and widely understood.</b> 10.63</p>
<p>To this end, building on work already in train, <b>institutions need to be more explicit and publicly accessible about the standards of attainment required for different programmes and awards.</b> 10.64</p>
<p>This will require institutions to be <b>explicit about the required standards for awards and to make this information publicly available.</b> 10.67.</p>
<p>If institutions are willing to develop in this way, so that it is <b>clear</b> to all stakeholders <b>what they can expect from higher education, we believe that it will be possible to restore a ‘qualified trust’ between higher education institutions, students and the public funders of higher education. If students, employers or staff in institutions have justified complaints or concerns about the quality of educational provision, there will have to be means to take action to protect them and the wider reputation of higher education.</b> 10.69</p>
<p>We have already noted our concerns about the <b>breakdown in consistency of the use of postgraduate qualification titles</b>, and have made a recommendation to rectify this as part of the development of a framework of qualifications. 10.70</p>
<p>The UK audits have identified a number of <b>areas for improvement</b> in collaborative audit arrangements, <b>such as clearer statements about the aims and purposes of different kinds of collaboration and formal processes to ensure the active management of remote provision</b>, once in operation. 10.75 .</p>

It will be clear from the extracts in Table 5.2 that the main device employed in promoting the impression that there is inconsistency and lack of clarity is considerable duplication and repetition of negative phrases either alone or combined with other phrases.

In addition, through the use of such phrases such as : ‘pre-condition’; ‘conditional upon strict understanding’; ‘return to a qualified trust’, chapter 10 re-enforces the impression that the alleged failing of inconsistency and lack of

clarity is not only fact rather than assertion, but also that such failings have persisted over time.

Example :

*“we believe that it will be possible to restore a ‘qualified trust’ between higher education institutions, students and the public funders of higher education.”*  
(10.69)

Example :

*“It would be a **pre-condition** that*

- institutions are explicit about standards*
- institutions are prepared to adopt national codes of practice”* (10.68)

and later in the chapter:

- franchising should continue, but only on the **strict understanding** that it must not prejudice the assurance of quality and maintenance of standards “*  
(10.74)

Another device used in chapter 10 to reinforce the impression that an alleged failing is fact, rather than assertion, is to discuss possible remedies for those alleged problems. Examples of this device are presented in the next table.

<b>TABLE 5.3 Remedies for the implied shortcomings to build a particular impression about the status of implied shortcomings</b>
We believe the best progress will be made by building upon existing practice, recognising that each institution is responsible for its own standards, but at the same time <b>engaging the whole academic community</b> in sharing a <b>collective responsibility for standards and quality of provision.</b> 10.3
We believe <b>there is a need to develop quality assurance practices which allow for diversity</b> throughout the system, <b>yet ensure that diversity is not an excuse for low standards or unacceptable quality</b> 10.8
While, therefore, we see value in completing the current round of assessments, for the longer term we see <b>the way forward lying in the development of common standards</b> , specified and verified through a strengthened external examiner system, supported by a lighter approach to quality assessment. For this to happen, it would be a pre-condition that: <ul style="list-style-type: none"> <li><b>• institutions are explicit about the content of, and terminal standards required for, the awards they offer</b>, with students and employers having accurate and clear information about programmes;</li> <li><b>• institutions are prepared to adopt national codes of practice</b> (analogous to those prepared by the Higher Education Quality Council (HEQC) and other organisations) to support quality provision with guidance for students, overseas students, and others. 10.68.</li> </ul>

The identification of remedies has the impact of reinforcing the suggestion that there a problem exists in the first place which requires to be corrected.

Next is the justification for state intervention. The following table builds on the impressions created in the table 5.3 above. It presents a collection of statements which suggest the remedies proposed are essential to ensure continuity, even though no evidence has been offered that the alleged shortcomings exist and that continuity is under threat.

<b>TABLE 5.4 Statements that imply current arrangements are in danger without the interventions described.</b>
We are no less concerned to ensure that students who commit themselves to several years of study can be assured that <b>the awards they earn continue to be respected and valued.</b> 10.8
We intend the framework of qualifications to allow for such flexibility, whilst <b>ensuring the standards of all qualifications are maintained and achievements are clear</b> to students and to employers.10.47
There would be little satisfaction for staff in an institution whose <b>awards were not well regarded.</b> 10.62

***Terms and concepts***

Before leaving section 5.1, I would like to point to a particular problem of presentation as it relates to recommendation 25, that is, although the Committee’s concerns clearly related to the standards of awards, their presentation of the issue put particular emphasis upon the word ‘benchmark’. This, I will demonstrate in sections 5.2 and 5.3 of this, chapter had the effect of creating considerable confusion and damage to the policy initiative.

**5.2 The benchmark task referred by Dearing to QAA**

In this section, I examine that part of the policy trajectory at which the benchmark initiative was referred by the NCIHE to the QAA for development.

In terms of research question 1: to what extent was there unanimity or diversity at the point at which the policy intentions were handed to the QAA for development - a significant interpretative shift took place between tread one and tread two, ie at the point that the recommendations of the NCIHE were referred to the Agency. Specifically, paragraphs 10.63 and 10.64 of the report make clear that the Committee's focus of attention was on the standard of **programmes** and **awards**. However, examination of the statement from the QAA issued following the NCIHE report, shows the QAA comments relate to '**subject** level' and the standards of awards becomes secondary. 'Subjects' is not mentioned in the NCIHE recommendations.

#### **NCIHE**

*10.63 We conclude that UK **awards** at all levels, and especially the first degree, must be nationally recognised and widely understood (NCIHE 97)*

*10.64 To this end, building on work already in train, institutions need to be more explicit and publicly accessible about the standards of attainment required for different **programmes and awards**. It would be both impractical and undesirable to try to achieve close matching of standards across the whole of higher education in all its diversity. What is practicable is to develop threshold or minimum standards which set an agreed level of expectations of **awards**, and we are convinced that this should be done now. (NCIHE 97)*

#### **QAA**

*"...that standards should be more clearly articulated at **subject level** across the higher education sector as a guide to...those involved in judging standards of attainment within **programmes and awards**. (NCIHE Recommendation 25, referred to in Higher Quality, The Bulletin of the Quality Assurance Agency for Higher Education.*

*(Higher Quality March 1998 pp 10 para 2))*

*Author's emphasis*



In addition, it is clear from the above extracts of the NCIHE report that what was sought was clarification of the standards of awards for a wide range of audiences, however the extract from the QAA's bulletin for HEIs implies a more specific audience.

As well as there not being unanimity about policy intention between the NCIHE and QAA I also propose that there was not unanimity about policy intentions amongst the Agency's own staff. And it may well be that this accounts for the some of the slippages referred to above.

The two quotations below, both from senior QAA staff, the first a statement published in Higher Quality Bulletin Vol 3 in March 98, and the second a comment provided in interview by the QAA assistant director with immediate responsibility for the initiative, exemplify the point:

1. *"The academic community is given the task of articulating standards, facilitated by the Agency which will establish 'expert teams' to undertake this work. The task of these expert teams (to be known as subject benchmarking groups (SBGs)) is to provide benchmark information by subject in the form of a statement of the standards of student attainment expected at the threshold level.*

*Higher Quality Bulletin Vol 3 in March 98*

2. *"OK - this is the personal account of the guy that ended up project manager for a benchmarking exercise, inadvertently and not by design. When we set up the three pilot groups, if the truth be known, we had very little conception of what we were asking the groups to do. OK. There was the HEQC experience to draw from. Alongside that, there was the whole set up of the Dearing recommendations which gave the benchmarking a particular slant. We gave the three pilot groups a pretty open agenda.*

*Respondent 19 .*

Although these statements appear to be contradictory, there is a sense that they are related, in that the first (bulletin) statement, although authoritative in tone, is pitched at a high level of generality and does not seek to develop the concept of benchmarking as it might apply to academic standards. It is likely that the 'transmission' mode of the QAA's bulletin statement and the absence of guidance or detail masked considerable confusion within the Agency about what had been referred to it by the Dearing Committee, and confusion about what the Agency were to require the 'expert teams' to do.

To some extent, the source of the confusion was the result of conflation of the policy objective with the means by which to achieve those objectives. To elaborate: the key objectives of the recommendations in Chapter 10 of the Report of the NCIHE was to make academic standards clear. However the Report conflated that objective with the means to achieve it ie by the use of benchmarks. Paragraphs 10.55 and 10.64 of the NCIHE report below, makes this clear.

*There is similar concern about the standard required for the award of higher education degrees. Given the large increase in the number of students taking degrees over the last 20 years, and a marked rise in the proportion awarded First or Upper Second class honours, many think that it is not plausible to say that standards have not declined. There is also a widely held view that degree standards are not uniform and that they cannot be in a mass system. NCIHE Para 10.55 "...What is practicable is to develop threshold or minimum standards which set an agreed level of expectations of awards, and we are convinced that this should be done now. NCIHE Para 10.64*

The actual Dearing recommendation which follows the above paragraphs together with the text of the corresponding QAA statement demonstrates how this conflation occurred:

**Dearing:** *Rec 25 We recommend to the Quality Assurance Agency that its early work should include: to work with institutions to establish small, expert teams to provide benchmark information on standards, in particular threshold standards, operating within the framework of qualifications, and completing the task by 2000. (NCIHE Recommendation 25).*

**QAA** *“The Agency should work with institutions to establish small, expert teams to provide benchmark information on standards.  
(Christopher Kenyon, QAA Chairman’s speech to the CVCP Conference University of Strathclyde, 18 September 97, reported in Higher Quality Vol 1 No 2 Nov 97).*

The effect of this conflation of the objectives with the means to achieve those objectives, is that ‘standards’ and ‘benchmarks’ come to have equal importance in the messages.

Respondents comments in Table 5.5: *Policy intentions: unanimity/diversity: clarity of the task* show there was confusion about what was to be produced. Indeed, the concern about standards was almost eclipsed by the idea of benchmarking - a concept imported from business practice and unfamiliar and and inconsistent with established HE practice. This conflation of objectives and means by which to achieve those objectives was commented upon by QAA’s Assistant Director with responsibility for taking forward the benchmarking task:

*“However, at the outset, there was something of a misnomer built into the project. The Agency, taking its lead from the Dearing recommendations talked about academic benchmarking, and I think if there had been a slightly more circumspect way of describing what the committee wanted rather than 'benchmarking', then much of the early difficulties that the Agency experienced with the pilot groups could have been avoided.” Respondent 19*

I believe this was a malign confusion at the heart of the initiative and was to a large part responsible for damage to it.

The point about confusion provides a useful context to the findings of the analysis of the interviews I conducted with 18 academics, each of whom was a member of one of the six benchmarking panels selected for this study. This is the topic of the next section, 5.3.

### **5.3 Unanimity/diversity of policy intentions: interviews with benchmark groups**

This section seeks to throw light on that part of the policy trajectory at which the policy task was handed from the QAA to the six benchmarking groups selected as the sample for this study. I draw on interviews with 18 senior academics who had been members of the 6 benchmarking groups and in addition, on an interview with a senior member of staff at the Agency with direct responsibility for the project.

The interviews are the basis for the tables in this section:

- Table 5.5 Policy intentions unanimity/diversity - clarity of task
- Table 5.6 Policy intentions: specific difficulties - language.
- Table 5.7 Policy intentions: specific difficulties – few or many benchmarks
- Table 5.8 Policy development: Benchmark groups interpreting the task

The tables are in a standard format. The interview extracts are presented in chronological order within each table, following the three phases of the initiative. It will be recalled that the chemistry and history benchmarks were part of the pilot (3 benchmark groups), English and theology and religious studies were in the first tranche (19 benchmark groups) and physics and biosciences were in the second and final tranche (17 groups). This construction was adopted so that where there was a strengthening or a diminution in the concerns expressed over those three phases, then such changes in tone can be traced within the table.

**Table 5.5 : Policy intentions; unanimity/diversity : clarity of task**

	Interviewees were asked about their understanding of what they had been asked to do within the benchmarking groups.	Res pon den t
Chemistry	We were all addressed by John Randall at our first meetings – I don't think he gave us any great insight into what we were supposed to be doing. I think that is reflected in the chemistry, history, law bench-marks, because they all came out differently. I honestly don't think QAA knew what it was getting into. I asked them – can you give me a definition of what you see as a benchmark in this sense. What guidance has you? Frankly the answer was virtually -nothing. Someone somewhere had indicated that all of these academic subjects Needed to be benchmarked. And they said yeah and pressed the button and set things going, but from thereon I really think that, even more than they had expected, they were in the hands of the panel.	<b>1</b> Old uni
	We had a meeting with QAA with... there were three weren't there – chemistry, history and law. And we all met together. It was quite clear then, that we all had very different views about what it was about even what the process was about	<b>2</b> New Uni
History	Nobody knew what it was about. It all arose from John Randall having the idea that it would be possible to set up a set of learning outcomes for each academic subject	<b>4</b> Old Uni
	Errm. I don't think one could say that agreement had been reached with QAA and that everything was plain sailing. There were issues of contention at the beginning and we kept coming back to them, pressing their representatives - what the precise remit was - how it would be applied - and how the practice of benchmarks was going to go forward. So there was a sense of a continuing (pause) dialogue. Nobody knew what it was about. It all arose from John Randall having the idea that it would be possible to set up a set of learning outcomes for each academic subject. We certainly did not want to make a statement about the threshold standards, which we thought was a lot of nonsense. The only way we could understand it was – what you need to do to get an honours degree in history, a sort of minimum standard, you know.	<b>5</b> Old Uni

Theology and Religious Studies.	<p>When we were set up, we were saying that these three were all very different models and we had to ask QAA what they wanted us to do with them, and I think because it was felt that HL&amp;C were so different, we needed from the agency a better sense of what the job was. I think they were surprised to be asked this question. I think QAA were naive about the Dearing Review initially, I think they thought it going to be easy and straightforward, that subject communities would come up with something straightforward, but faced with that reaction from the benchmark statements chairs, I do think that around this time they decided to give it over to the subject communities and they stuck with it. But you had to have something more convincing and much more specific. "...the QAA had briefing meetings with all the prospective chairs and it was in those meetings at the outset when the chairs met together that concern was expressed about the difference between chemistry history and law, and what were we to make of this difference and how were we to do the job – what was the job.</p>	7 Old Uni
	<p>I think we as a group, we did take some time to arrive at a shared understanding as to what the brief was about and that was particularly led by the joint chairs who between them made it very clear what their perceptions were of the exercise and what their priorities would be on it.</p> <p>And we did have some input from the QAA administrator, but it was clear that just as we were meeting separately, so were others in tandem, and there was a certain amount of making policy on the hoof going on with the ground notionally shifting a bit - that was evident because when we looked the bms which were already in existence, they were quite significant variations between them in different subjects their format was not by any means identical, neither was their length. And the way they worked towards the identification of levels was done differently, the terms they used for it was done differently. So we had to make our own minds up about what we were seeking to achieve within the parameters which were given. The parameters were partly clarified and partly remained blurred.</p>	9 New Uni
English	<p>Always there were questions, but these were prior to the start of us coming together as the benchmarking group. There were discussions at our subject associations about who it was for and about the use to which it would be put.</p>	10 New Uni
	<p>We were mystified by it to start with. We were not clear, I was not clear, the others may have been clear, I was not clear where this fitted in to a whole suite of documents. In other words what was going on simultaneously was not just other benchmarking groups, but proposals for subject review being drafted by the QAA, there was the code of practice, NQF, which we did not have. In other words, the benchmarking statement which logically might have come last, preceded some of these things. ....there was no context, other than the context we brought and the information that we had, and the working groups own sense of where we were going.</p>	11 Old Uni
	<p>We were right out in front of developments, in the first set of bms groups - there was a sense of pragmatism, but there were uncertainties. It was not clear for example whether we should be focussing on single honours or whether this was to apply to combined.</p> <p>I think also, because we were part of the first cohort, there was some uncertainty about the advice we were getting from our QAA minder, Mike Laughan, about the function of what that section (standards) should be, so that was a bit unclear in our minds I think.</p>	12 New Uni
Physics	<p>They called a one day meeting of all the chairs of the second wave. And they were given some very clear messages there. And they resisted at that stage. And some of it did not resurface again. Yes. In that meeting some ground rules were laid down and some of them were accepted.</p>	13 Old Uni
	<p>Fairly early on we did look at other benchmarking statements from the first tranche to see if there was anything which would help.</p> <p>Now, just going back to this M.Phys degree. I am trying to think. The work that was done on that was a lot of thinking through the basics of physics and what should be in and what should be out. In a sense that had done some of the ground work before this exercise even started and that involved collaboration across a number of universities. As I say, really it just led on from work that had been done earlier on the MPhys.</p>	14 Old Uni
	<p>We were sent copies of some of the other recent benchmarks statements, geography, and chemistry were amongst them. What we did not know about at that point was the diversity of styles which had been adopted, and the way these other benchmark groups had</p>	15 Old Uni

	approached it were quite different. So I think as a result of this we felt that we could take our own style as well. There was not too much of a house style about them. Some were brief, some rabbitied on a bit.	
Biosciences	Christopher Kenyon* himself said in a talk in Dundee about two years ago that the problem with benchmarks was that nobody actually knew who they were for and the people who wanted them most, least knew what they actually wanted them to be.	16 Old Uni
	I and another person on the group were invited to a preliminary meeting by the QAA, where they attempted to explain it. It was not just us, there were a whole bunch of people there at this one day meeting. The general idea was that we would then go back and explain it to the group and explain what was wanted of us. Q. How clear were the QAA in describing what they wanted from the groups? A. They appeared to me to be a little hesitant. They were getting quite a lot of flack from people, There was a lot of expressed antagonism about the whole concept of benchmarking.	17 Old Uni
	But I don't remember seeing a lot of guidance from QAA. Maybe the chairs were given specific guidance. I don't remember.	18 New
QAA	OK - this is the personal account of the guy that ended up project manager for a benchmarking exercise, inadvertently and not by design. When we set up the three pilot groups, if the truth be known, we had very little conception of what we were asking the groups to do. OK. There was the HEQC experience to draw from. Alongside that, there was the whole set up of the Dearing recommendations which gave the benchmarking a particular slant. We gave the three pilot groups a pretty open agenda.	19 QAA

\*The Chairman of QAA

Table 5.5, (Policy intentions: unanimity/diversity: clarity of the task) shows that 15 out the 18 interviewees responded negatively to questions about the clarity of the policy intentions. All six chairs are included in that number. Excluding the chairs, the number of academics from new and old universities is the same, and there is no discernible difference in terms of negative or positive responses being attributable to the type of HEI with which the respective respondents are associated.

Taken overall, many of the respondents convey strong feelings about the initiative and also convey uneasy conjecture about the intentions of the QAA and the government being carried forward by the initiative. I return to this point later. The most vigorous comment about clarity of the task occurs in the earliest stages of the initiative. Particularly strong comment was made by the chairs of four of the benchmarking groups involved in the pilot phase and the

first phase who were particularly forthright about the confusion about policy intentions, and I highlight their comments below.

*“I honestly don’t think QAA knew what it was getting into. (Respondent 1 pilot)*

*“Nobody knew what it was about. It all arose from John Randall having the idea that it would be possible to set up a set of learning outcomes for each academic subject. (Respondent 4 - pilot)*

*“When we were set up, we were saying that these three (three pilot groups: history, chemistry and law) were all very different models and we had to ask QAA what they wanted us to do with them, and I think because it was felt that history, law and chemistry were so different, we needed from the Agency a better sense of what the job was. I think they were surprised to be asked this question. (Respondent 7 first tranche).*

*“There were discussions at our subject associations about who it was for and about the use to which it would be put. But certainly there were questions about why do it at all. (Respondent 10 first tranche).*

A number of interviewees expressed surprise about the variation in the benchmarks that had thus far been developed, and they imply that this suggested a lack of direction from the Agency (respondents 2,7,9,15). Concern is also evident about the processes as they were organised by the QAA. Respondent 2 comments on this and respondent 17 comments that whilst there were a number of groups meeting at the same time, there was no encouragement for there to be an exchange of views across the benchmarking groups, even where those groups had a disciplinary relationship:

*“Quite apart from the fact that there is a diversity of biosciences, we also found that there were a whole bunch of other groups that might be considered to cross with the biosciences for example, subjects allied to medicine and some of the agricultural provision was also akin to biosciences. And we were quite concerned to know what*



*those groups were doing. The agriculture people were meeting at the same time. The thing that we thought was a bit bizarre about that, was the QAA seemed quite keen to keep the individual groups separate, but we desperately wanted to make contact to find out what they were doing to make sure there were no major discrepancies in our modes of thinking. Especially, as it transpires that QAA will allow departments to select the benchmark which they feel is most appropriate to their degree scheme. And in areas of provision, where it could be the biosciences benchmark or another benchmark then that did seem to us to be something where there should be a degree of consistency. (respondent 17 Biosciences, second tranche).*

The comment relayed by respondent 16 in table 5.5 purported to be a quote from the Chairman of QAA is interesting if true, since it suggests that at the very senior level of QAA, there were reservations as to whether benchmarking academic standards was ever an achievable task.

In terms of the common theme of criticisms about the clarity of the task amongst respondents, it will be recalled that there was universal condemnation of the initiative before its inception, as illustrated by the quotation below drawn from a report of a conference on academic benchmarking in 1998, so if read in this context, the criticisms may also suggest commonly and pre-existing negative attitude toward the initiative. *"An unbelievable simplification of what academics do" which "should be rejected on intellectual grounds" (THES 9.12.98).*

***Policy intentions: specific difficulties - language barrier: Table 5.6***

A particular feature contributing to the problems about clarity was the language and terminology used by the QAA and this was mentioned by 11 out of 18 respondents. The full results are set out in table 5.6.

<b>Table 5.6 specific difficulties: benchmark language</b>		Res p'd
Chemistry	I honestly don't think QAA knew what it was getting into. I asked them – can you give me a definition of what you see as a benchmark in this sense. What guidance have you. Frankly the answer was virtually nothing.	1 Old uni
	But I think there was a misunderstanding because of the language - the word 'benchmark', that that was describing the knowledge base as opposed to some of the other skills and attributes we would loosely call education.	2 New Uni
History	<p>You look at some of Randall's statements. You look at the language he uses. We could not make head nor tail of it. It was jargonised to the point of absurdity.</p> <p>We were given a lot of stuff about producing statements on assessment.....I mean, it was all in a language that we did not understand, did not want to understand. It was an alien language that they were speaking. There was an awful lot of problems about the terminology in which this exercise was going to be conducted.</p> <p>There was a lot of misunderstanding about terminology. Because the QAA, We certainly did not want to make a statement about the threshold standards, which we thought was a lot of nonsense.</p> <p>The only way we could understand it was – what you need to do to get an honours degree in history, a sort of minimum standard, you know.</p>	4 Old Uni
Theology & RS	We, and I think for many people in all the subject areas, find the 'learning and teaching' speak is a turn off. Generally you will find a certain scepticism about it. People think that being inspirational IS the most important thing.	7 Old Uni
	Yes, when I said the notion of benchmark was not familiar, I was thinking specifically of the term bench mark, which has an almost mechanistic, measurement ring about it, of a very durable and physical kind and that was the sense in which it was strange to me.	9 New Uni
English	I had to ask what benchmark meant. My understanding is what QAA wanted originally was a 'kitemark' degree against which others might be measured. That changed. But I think that was the original concept. First of all we had to decide what was meant by threshold. That was very tricky. I do not know what was in QAA's mind. I think defining standards is problematic.	10 New Uni
	So I think we spent the first two meetings finding our way through the terminology. The other difficulty we had.... it was not a difficulty in the end for us, but we thought there were difficulties around it, were the issue of threshold and model.	11 Old Uni
	Q. Did the group have difficulty with the notion of bms as applied to something as complex as this? A. The notion of benchmark – I do not think in the mind set of the group that was ever the case – we were trying to capture those things which were already happening within the English community to guide assessment, the syllabus, the skills.	12 New Uni
Physics	We found it difficult wrestling with threshold and model and what that really meant.	15 New Uni
Biosciences	Well it (benchmark) is a very bad expression, because benchmark can mean all kinds of different things. There was a very wonderful talk in Swansea who actually brought on a piece of wood and talked about what a benchmark was.	16 Old Uni
	Q. Do you think that the term benchmark is an appropriate one for the task. A.No. I don't think it is because the implication of that term is about measurement. I think that term is meaningless in the context of what has emerged. All the benchmark statements that I have seen have been about other things: what can be obtained from doing a degree, and they serve almost as an advertising role. I think also, the benchmark statements themselves have enabled people to focus upon what at least should be represented in degree schemes.	17 Old Uni

Of particular note in the eleven comments reproduced in table 5.6 ‘specific difficulties – language’ is that half of the chairs selected for this study commented that the language was so unclear that the central task was in doubt. The term ‘benchmark’ and the concept of ‘threshold standards’ appear to have been particularly problematic. The comments of the chairs of four of the six groups, relating to language, are set out below:

*“...it was all in a language that we did not understand, did not want to understand. It was an alien language that they were speaking.” (respondent 4 pilot phase).*

*“I asked them – can you give me a definition of what you see as a benchmark in this sense.” (respondent 1 pilot phase)*

*“We, and I think for many people in all the subject areas, find the ‘learning and teaching’ speak is a turn off. Generally you will find a certain scepticism about it. People think that being inspirational IS the most important thing.  
(respondent 1 first tranche)*

*“I had to ask what benchmark meant.” (respondent 10 first tranche).*

Examination of this set of eleven extracts taken overall, gives a general impression of respondents examining the terms used and trying to make sense of them in the context of their own shared professional understanding. They are academics and can be expected to explore a wide range of alternative interpretations. It can be deduced, and indeed is explicit in a small number of the comments in the table that this ‘sense-making’ took up some time. It is reasonable to assume that it was a characteristic of many of the other 36 groups which also met but are not considered within this study.

A common lack of sympathy about the initiative is also discernible across this group of interview extracts.

As well as the term 'benchmark' another phrase 'threshold standards', key in the Dearing recommendation, is identified as a term that many of the respondents either did not understand or rejected, as not being sensible. Respondents said in their interviews that their benchmark groups had elected to describe something other than the threshold performance. In fact, there is variation across the benchmarks: some describe threshold, some describe a typical performance which they variously termed 'model' or 'focal' and some describe excellent performance. Many benchmark groups provide combinations of these.

The clarity of the task and the adequacy of the language used to describe it were clearly vital for there to be any consistency in what was produced by the groups. In trying to make sense of a brief that they find incomprehensible (incomprehension possibly tinged with un-palatability) the benchmark groups turned their attention to reinterpreting the task.

Ambiguity is important in the context of interpretation and also in the context of possible lack of sympathy with the initiative. It can reasonably be supposed that academics on the disciplinary benchmarking groups found the ambiguity useful in ensuring that interpretation was on their own terms safeguarding their own established practices, and indeed evidence that such an approach was adopted can be seen in table 5.6.

***Policy intentions: specific difficulties – few or many benchmarks: Table 5.7***

One particular perspective relating to the clarity of the policy intention relates to the number of benchmarks it was intended should be developed. Benchmarking groups were not clear, and they indicated in their interviews that the Agency’s rationale was not clear, as to whether there were to be a small number of generic benchmarks for cognate disciplines, or whether there should be many different benchmarks to cover the topology of HE provision in UK HEIs.

**Table 5.7: Specific difficulties: policy intentions - few or many benchmarks**

<b>Chemistry</b>	I honestly think there were people in QAA who really thought that there could be a benchmarking document for all subjects. I definitely detected a view that once subject matter is.....if its about standards, (not about content) as said by Dearing then we can create one document and all we want is academic advice on the document. And I'm afraid I had to say bullsh...to that. No department would accept that.	<b>Res p o n d e n t  1 O l d U n i</b>
	Most of the statements I feel could be exchanged from one subject to another. In terms of the 42 (42 benchmarks were originally envisaged later to become 47) – the rationale for that number was dictated by the number of TQAs (inspections) they could do in a defined cycle, a decision dictated by administrated rather and academic considerations –so there was an arbitrariness about how it mapped onto the HE terrain and lots of disciplinary groups railed against that. There was sense that it might stop at the three pilots.	<b>2 N e w U n i</b>
<b>History</b>	Politically, what we hoped for was that the history benchmark would, if other disciplines wanted it, something of a template at least for the humanity disciplines.	<b>5 O l d U n i</b>

Theology and Religious Studies.	Another difficulty was that there were these 41 or 42 subject areas. It seems arbitrary. I was sceptical about it. There are more in the RAE and if they really wanted to map on the spread of subjects then they would need a 100 or more. Or alternatively they could have gone for a small number of generic clusters, about seven would have done it. A larger number would have raised concerns that a national curriculum was in QAAs thinking, a small number would have been more acceptable and would not have raised that concern, but 42 was sufficient to cause some concern about a national curriculum, but also, it complicated the job, and in some areas it was just ridiculous.	7 Old Uni
English First tranche	“...we felt we had to define what the subject was, what were the underlying principles that distinguished the subject, or was it that it was possible to lump all the humanities together, and have one benchmark statement. Indeed that debate did take place at QAA at one point, in the context of how many subject categories there should be.	10 New Uni
	Joint honours was something I don't think we ever comfortably resolved - but TQA never comfortably resolved it either. The whole thing was geared towards single honours and therefore admitted roughly a third of UK students, so the BMS was fairly shaky in respect of that.	11 Old Uni
Physics Second	And the QAA certainly came to the table with a 'one model fits all' view. They were disabused at the very first meeting of the Chairs.	13 New Uni
Biosciences Second tranche	The important joke in which there is some truth – take the history one, which is quite a good one – and write biology instead of history and go home. And there really is some truth in that	16 Old Uni

Although the groups I have selected for this study do not demonstrate it, the grouping of academic disciplines was arrived at with some difficulty and some proposed groups were contended by the sector. For example, it was originally intended that English be part of a larger benchmark: English and American Studies. Some other benchmarks included a bundle of disciplinary areas which many considered were not coherent, for example Hospitality, Recreation, Leisure, Sport and Tourism. The 42 benchmarks eventually selected simply excluded some subject areas even though had become an

established part of the offering in many universities, and did not address at all interdisciplinary and multidisciplinary provision or joint degrees.

There was conjecture in some of the interviews with members of the pilot and first tranche groups that there might be a small number of generic benchmarks to cover the whole of HE provision. Seven respondents commented on this. Of those, two respondents were adamant that generic benchmarks would be unacceptable, other comments are more equivocal. Respondent 7 of the Theology and Religious Studies group pinpoints the issue:

*Another difficulty was that there were these 41 or 42 subject areas. It seems arbitrary.....if they really wanted to map on the spread of subjects then they would need a 100 or more. Or alternatively they could have gone for a small number of generic clusters, about seven would have done it. (Respondent 7, first tranche)*

However, a member of the chemistry benchmarking group well understood that the rationale for selecting 42 benchmarks was to map onto the prospective inspection regime, where 42 is the number of inspections that had routinely been conducted in the Teaching Quality Assessment (TQA)/Subject Review inspection cycle and would therefore be appropriate for the inspection regime trailed by QAA, but not at that point developed.

*In terms of the 42 – the rationale for that number was dictated by the number of TQAs they could do in a defined cycle, a decision dictated by administrative rather than academic considerations –so there was an arbitrariness about how it mapped onto the HE terrain and lots of disciplinary groups railed against that. (Respondent 3, pilot).*

At the beginning of this chapter I pointed out that the Dearing recommendation related to the standard of programmes and awards The

picture which emerges from the findings revealed by table 5.7 is that of QAA adapting the Dearing recommendations to fit pre-existing TQI/Subject Review models. That model was predicated on the number of inspections which could be completed within a six year cycle. In the TQI/Subject Review model already established, each university department in each disciplinary area could be visited once every six years, so long as the units of analysis (in this case subjects) numbered approximately 40.

The 'slip' from awards to subjects evidenced at the beginning of this chapter and the ambiguity about one or many benchmarks revealed in table 5.7 strongly suggests that the QAA sought to 'fit' the Dearing recommendation into pre-existing, and well-tested practice. It has to be borne in mind the enormous logistical difficulty of organising inspections of all the HEIs in the UK.

I propose that the above insight is suggestive of a common tendency within the policy process: that where the ambiguity in the policy objectives permits, then the gravitational pull will be toward interpretation which allows developments to be interpreted to fit existing practices, rather than to search for 'blue-sky' responses to the policy objective. I further propose that such gravitational pull would be facilitated at least in part, through the activities of those who Lipsky calls 'street level bureaucrats' (Lipsky 1993:389-92).

#### **5.4 Unanimity/diversity of policy development**

In this section I move from policy intention to policy development. There are two parts to this section. The first deals with respondents answers to questions about the consensus within their own benchmarking group as to the task that was to be undertaken. The second part reviews two papers developed



by other researchers and published on the LTSN website in 2001, each of which examines the variability in the benchmark statements which had recently been published.

Table 5.8 “Policy development: benchmark groups interpreting the task” captures respondents comments about their approach to the task.

**Table 5.8: Policy development: Benchmark groups interpreting the task**

Chemistry	And I said, can I define it that a benchmarking document should be an indication of content, all the chemical material that should be present in a degree course, unless eyebrows would be raised. That is, eyebrows would be raised if certain things were not in. Other things are added to chemistry courses for diversity but we were looking for a ‘spine’ of every chemistry course – what every BSc chemistry course should contain and also indicated procedures about how it should be taught, examined and assessed.	Respondent  <b>1</b> Old Uni
	Yes. Initially, the group itself fell into the trap and initially started discussing ideas of topics which should be present in the syllabus so there was a lot of discussion at the beginning I think and then people realised that this was not the way to go. It would not be accepted by the community and in any case, who were we, ourselves to say, we were just a group of people who had certain views and probably could not even agree amongst our selves (laughs). That was an initial hurdle – getting over this view that what we were doing was drawing up a list of contents if you like, for degree courses in chemistry and we then realised that what we were really doing was identifying the types of skills we would expect an observation to have in terms of observation, manipulative skills and things like that.	<b>2</b> New Uni
	What I do remember was, when we started the process was that we spent far too much time on content. We were trying to focus on a minimum content that would define a chemistry. When we started off, and I remember this clearly, we focused on subject knowledge. I never wanted to do that but, because I was one of the people who said this was all about gradueness really, rather than the subject. So at the end of one of our early meetings, the list of chemistry content was enormous, and I am happy to say that most people came to see that that was ridiculous.	<b>3</b> New Uni
History	The task was defined as defining the qualities of mind of a historian, the content of a subject – what history should be studied, the teaching and learning the subject, and the assessment of the subject.	<b>4</b> Old Uni
	I think there was an opportunity there where we wanted to make a statement about what was integral to the discipline and it also provided an opportunity where we could make a statement about the transferability of skills, and indeed about the high level of skills, that we thought historians emerged with.	<b>5</b> Old Uni
	One of the issues was whether our task was to lay down the benchmark for a programme or to lay down the benchmark for a qualification, or what was required of a student achieving a 21 or a first, or whatever it was. There was a great deal of discussion about that. The feeling was that what we were really concerned about was programmes. After all it was programmes which were to be inspected. And I think there was some reluctance at the beginning to get drawn into the road where you say what a 2i is and I think in the end we didn't do that, but there was a great deal of discussion about it.	<b>6</b> New Uni

Theology and Religious Studies.	<p><b>Q</b> when you got to your actual benchmarking group, was there concern in that group about the task or were you at that point able to tell them what it was.</p> <p><b>A.</b> I think we were able to say a little bit about what we were meant to do. We did have some difficulty in interpreting the outline framework that QAA gave us and as I say, we were v.uncomfortable about the threshold standard which is what QAA insisted we had to do. But I think within those parameters we saw what we were doing and I think in the end I think we tried our best to make something quite creative out of it.</p> <p><b>A.</b> The attempt to benchmark does not come off . We were not capable of doing what the Dearing report would have us do, so I would have a scepticism about it . In terms of defining what a subject areas about and trying to define the sort of skills and competencies which we try and create in a student, I think the exercise was a useful one.</p>	<b>7</b> Old Uni
	<p><b>*Q</b> What did you consider the task before the BMS group to be?</p> <p>- to recognise the diversity</p> <p>- to be ambassadors for the for the subject and explain that it was a valuable area of study for HE. We got torn between coherence respecting the diversity that was there. Defining the discipline and defending the diversity were the main priorities.</p>	<b>8</b> Old Uni
English	I think defining standards is problematic. What we tried to do was to map skills on to the statements we had made about subject knowledge and curriculum. We tried to incorporate those things into the statement on standards.	<b>10</b> New Uni
	We were protecting the possibility of change. We were protecting new interests new developments. We did not wish to prescribe in any way: assessment, teaching or content of the discipline. And we insisted, therefore prefacing benchmark statements about the purpose and purpose of the BMS. Protecting change and openness. Cardiff is a very radical English department.	<b>11</b> Old Uni
	The notion of bm – I do not think in the mind set of the group - that was never the case – we were trying to capture those things which were already happening within the English community to guide assessment, the syllabus, the skills.	<b>12</b> New Uni
Physics	Yes. in that sense we would agree, it is about what is core to the discipline.	<b>13</b> Old Uni
	We were saying as a profession, what would a product of the university system on the whole look like, what background would they have had what skills would they have and so on. The context of this would be that if we were to define a physicist, ie someone who had a physics degree, then these would be the basic elements that would define that. How exactly you introduce, teach, learn, facilitate in your own degree is up to you and there will be a plurality of ways of doing that.	<b>14</b> Old Uni
	We decided not to be specific about content. So we have a statement about content earlier on and then in the section about thresholds and typical attainments, we have used general terms. The issue of content comes back to the point I mentioned earlier about the physics academic family being quite a close knit family through the Institute of Physics, one of the reasons is that some years ago the community drew up a sort of national curriculum for physics undergraduates and we had those.	<b>15</b> New Uni
Biosciences	We wanted a document that was as un prescriptive as we could get away with. That was our underlying motif and it is related to partly to the fact about a cynicism about the value of the operation in the first place. I was not the only person to feel that. So that is why when you look at it you see that almost every part of it has words like ‘normally’ ‘usually’, ‘would be a good idea if you could’ and that kind of thing. We wanted it to be as unrestrictive as possible, as we respectably could. So that what we write is what everyone is doing already. So we discussed – to what extent is the benchmark a description rather than a prescription and I think to quite a significant sense, ours is a description. In other words. On the whole, if there was clear evidence that this establishment did not actually provide this or that, then we left it out.	<b>16</b> Old Uni
	Some areas of the biosciences are so diverse that it is almost a foreign language for others in biosciences. And that meant particular difficulties about what would go in the document. One of the things we are told by careers departments that people with biology degrees do quite well in securing employment because they are seen as having a combination of skills. They do things like group working and oral presentations and their writing skills are not too bad on the whole, but they are also semi numerate. They have some mathematics and statistical skills. So it is that combination which is of interest to large chunks of potential employers. So we thought that focussing on the skills which would prepare them for the world of work would actually be the best approach we could take.	<b>17</b> Old Uni
	I think at first they tried to look at content. We spent a lot of time... in retrospect, wasted a lot of time... but maybe that was part of the way the group got together and formed itself..... looking to see	<b>18</b> New

	<p>if there is any possible, conceivable content that we could identify as being common across all of the bio sciences, and arguing about what biosciences actually was. We came up with ridiculous things, like structure of a cell. Well I mean, they can do structure of a cell at GCSE or at primary school level. So then we started talking about what level. Does that mean that they have to get into the fine detail of mitochondria? I just got ridiculous. The Chair in the end, just said... He said: I think we should forget about content because it is a waste of time. He said we should consider skills.</p>	Uni
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Seventeen of the eighteen respondents answered this question directly. It is clear from the table that academics had difficulty in interpreting their task. There is no overall cohering response to this question. There are however two particular themes – one of starting with exploration about content, (five out of seventeen respondents report that this was then starting point for the group) and then, for the most part, discarding that approach in favour of something else. There is also a theme which emerges in three interviews about defending the discipline from external interference, a theme which was also evident in the responses in Table 5.6. Interestingly, one response clearly saw the benchmarking task as an opportunity for promotion of the subject (respondent 8). Two respondents are explicit that in their (personal) opinion, the task as defined by Dearing was not able to be operationalised (7 and 10). A number of respondents comment on approaches they made to representatives of the QAA for further guidance noting that such approaches met with only limited success. However, as suggested earlier, not all respondents found the lack of guidance from QAA entirely unhelpful as the following quotations suggest:

*“In other words we were writing key documents in a process which at that stage was not specified. I think, so far as we were concerned, that there was a vacuum meant that we could produce the document that we wanted to produce.  
Respondent 5 first tranche*

*“ What we did not know about at that point was the diversity of styles which had been adopted, and the way these other benchmark groups had approached*

*it were quite different. So I think as a result of this we felt that we could take our own style as well. Respondent 15 second tranche*

It is also clear from a number of quotations that worries about what the benchmark would be used for had a considerable influence on respondents' approach to their task. This concern was more apparent in the early stages of the initiative.

*“There were issues of contention at the beginning and we kept coming back to them, pressing their (QAA) representatives – what the precise remit was – how it would be applied.” Respondent 6 pilot*

*“There was considerable concern that we were being driven towards a prescriptive curriculum and indeed a national curriculum and we were not going to tolerate that” Respondent 7 first tranche*

*“what I was doing, what we were all doing, was to ensure that we did not end up with a national curriculum” Respondent 11 first tranche*

It is interesting that respondent 6 states that in their group there were discussions about exactly what was being benchmarked. Identification of a specific focus may not have been feature of discussions in all groups. The following grid seeks to summarise statements drawn from the interviews as to what respondents in each of the six benchmark groups believed was the task undertaken by their group.

Chemistry	Defining the core content of what should be in a chemistry degree
History	Providing a description of those things which are integral to the subject. Developing a benchmark for programmes which could be used in external inspection
TRS	Defining what the subject is about. Defending the discipline and its diversity from external intervention
English	Defining what the subject is about Protecting the discipline from external intervention
Physics	Defining for an employer what a physicist should be
Biosciences	Describe what everyone is doing in an un-prescriptive way. Describe the skills of the bio scientist.

A reading of the above suggests that the specific focus in each varied. Some benchmarking groups appeared to focus on the programme, others on the department and still others on the attainment of students. Respondents were therefore also asked a more specific question about what it was that was benchmarked in the statement which their group produced.

The following is a sample of the answers which were given to that question.

*Q: In terms of what was being benchmarked - your group saw itself as benchmarking programmes?*

*A: Yes. Benchmarking programmes and then defining how because you are defining subject content and the various skills, then you are developing the performance criteria that a student would have to attain - but you are defining a programme. Respondent 3 pilot group*

*Q: What are you actually benchmarking here?*

*A History programmes and a department's capacity to deliver on standards –that departments can deliver work of an acceptable standard that can be assessed for individual performance. Respondent 4, first tranche*

*Q: What were you benchmarking? It appears from what you say that it was the department?*

*A: Yes it was Respondent 5 first tranche*

*Q: What were you benchmarking?*

*A What was in our mind was, if you were an employer what could you reasonably expect as the product of a university education in physics....What reasonably that person would be able to do. Respondent 14 second tranche*

*Q: What is being benchmarked in this statement do you think, is it student performance or programmes in institutions. I was not sure about this one – it seems to have the student more in the centre. What do you say to that?*

*A: We were thinking much more of the institution and the department in terms of ensuring that the individual awards did meet these common statements, rather than inform the students what they should achieve. Respondent 15 second tranche*

The point of the review of the above responses about exactly what was being benchmarked, is to show, once again, that a variety of approaches had been adopted leading to variation in policy development.

It is possible to construe from the foregoing that not only did the QAA leave the benchmark groups very much to their own devices in the development of the statements, but also that not all the benchmark members had established prior, crystal clear agreement even with individual groups precisely what their task was, and possibly not exactly was being benchmarked. As suggested earlier, the looseness of the specificity of the task given to the benchmarking groups can only have facilitated the approaches adopted.

As shown earlier, the analysis so far in this chapter has indicated that those on the benchmarking groups sampled for this study were generally critical of the initiative, unconvinced of its value and confused about the product they were expected to deliver. I suggested earlier in this chapter that the QAA had sought interpretation of the Dearing recommendation which fitted existing practices as they related to a prospective inspection regime. I propose that the benchmarking groups too were concerned in their individual groups to maintain as much as possible of established practice. A specific incident in the policy process enabled this to happen.

Those monitoring the development of the initiative at the time could not have failed to note that the key phrase in the benchmark initiative: ‘ **benchmark information on standards**’ in the Dearing Report and in the early QAA

statements was soon replaced by a different phrase: **'benchmark statements'**.

The adoption of this alternative phrase is pivotal in the initiative. It discards the central tenet of standards in favour of something for which there had been no perceived or expressed need in the Dearing Report or in any other quarter. However, the QAA responsible for stewarding the initiative through to implementation appeared to be unconcerned by this development:

*"Ironically, the word 'statement' never came out of Dearing, it came from the historians who wanted a statement of what history was, and that nomenclature inadvertently as far as the QAA was concerned, stuck". (Respondent 19)*

This is a key moment – the crux - in terms of the policy process. A statement which describes a subject is far removed from the intention set out in recommendation 25, and diminishes substantially the focus on academic standards with which that recommendation was intended to deal .

The point that the switch in the terminology from 'standards' to 'statements' took place is the instant when the task has become one defined by the benchmarking groups rather than one defined in the policy intention. The lack of direction by the QAA and the emancipation of the concept of the benchmark over the concept of standards only assisted the switch. QAA, in accepting that change were, complicit.

### ***Terminology and policy shifts***

The following are particular milestones within the time frame July 97 and October 01, the formative years of the initiative:



## Milestones

July 97	April 99	April 2000	Oct 01	
Dearing Report Recommendation 25 ↓	Pilot benchmarks published	1 <sup>st</sup> tranche benchmarks	2 <sup>nd</sup> tranche benchmarks	
<p>The grid below tracks the terminology used to describe the initiative. The terms used are taken from the NCIHE report and from the QAA's own bulletin to the Sector: Higher Quality- a publication used to report progress to the sector on the benchmarking and other initiatives, to provide a regular commentary to the sector on developments to which it should be alert.</p>				
↓	↓	↓	↓	↓
July 97 (Dearing)	Oct 98	Nov 99	April 2000	Nov 01
Dearing Report	QAA Higher Quality 4	QAA Higher Quality 6	QAA Higher Quality 7	QAA Higher Quality 9
<p>Para 10. 64</p> <p>What is practicable is to develop threshold or minimum standards which set an agreed level of expectations of awards, and we are convinced that this should be done now. We recommend to the QAA to work with institutions to establish small, expert teams to provide <b>benchmark information on standards</b>, in particular <b>threshold standards</b>, operating within the framework of qualifications, and completing the task by 2000.</p> <p><i>NCIHE 97 Par 10.64 &amp; Recommendation 25</i></p>	<p>Headline:</p> <p><i>Supporting The New Approach:</i></p> <p>To support the new approach work will be completed on: <b>.....Subject Benchmark Standards</b></p> <p>– to set agreed national standards in each subject.</p> <p><i>QAA 98 p4</i></p>	<p>Headline:</p> <p><i>Producing And Using Subject Benchmark Information:</i></p> <p><b>Subject benchmark information</b> provides a set of principles shared by each subject community, and a basis for discourse when <b>quality and standards</b> are considered.</p> <p><i>QAA 99 p 12</i></p>	<p>Headline:</p> <p><b>Subject Benchmarking: Publication Of Statements And Formation Of New Benchmarking Groups</b></p> <p>The <b>benchmark statements</b> themselves, ....., make it clear that the statements are reference points to be used, as appropriate, when programmes are designed, approved, reviewed and explained in programme specifications.</p> <p><i>QAA 2000 p 4</i></p>	<p>Headline:</p> <p><i>How it all fits together: Quality assurance and the standards infrastructure:</i></p> <p><b>Subject benchmark statements...</b> describing the nature of the general intellectual characteristics which the subject aims to develop in a student</p> <p><i>QAA 01 p11</i></p>

**Fig 6 Shifts in terminology, shifts in policy.**

The italicised quotations in the grid are 'headlines' drawn from the QAA's own bulletin *Higher Quality*. The intent of benchmarking can be seen to change over the period of development and is quite different at the end of the development by the benchmarking groups from the intent set out in the Dearing recommendation. This illustration also supports an assertion I made



earlier in this section, that the 'idea' of benchmarking became more important than that of standards. I've colour-coded key words to support the points being made.

I propose that it is unequivocal that there was diversity in respect of policy development.

However, Manz Yorke and Norman Jackson have already made that case very well in working papers posted on the former LTSN website in 2001, and I will draw on those papers to conclude this section of chapter 5.

### ***The LTSN Working Papers June 01***

Following the publication of the first 22 benchmarks in 2001, two papers appeared in June that year on the LTSN Generic Centre web pages. Both papers had been written by respected academic researchers.

Consideration of these two papers serves to validate my own assertion in response to research question 2, that there was not at this point in the policy trajectory unanimity in policy development. The two papers drawn on are:

- Professor Mantz Yorke: Assessment issues arising from Subject Benchmarking Statements. March 01.
- Dr Norman Jackson: Subject Benchmark Information: implications for curriculum design and assessing student learning. June 01

What Yorke and Jackson offer is an overview of the initiative that is at the same time both an 'insider' view, since whilst both were active in what might be termed the 'quality management and enhancement industry' which had begun to emerge in the 1980s and Norman Jackson was a sometime employee

of the Agency, but also academics who understood about academic territories and the diversity of practice within them.

Both researchers adopt the position that QAA had stated in the Handbook for Academic Review that “Reviewers would use relevant benchmark information as a means of determining whether the intended learning outcomes of individual programmes are appropriate” (QAA, 2000d:7).

The LTSN papers consider various dimensions of the benchmark statements developed within the pilot stage (three benchmark statements) and within the subsequent first tranche. Both papers reported separate analyses of the 22 benchmark statements and both had found considerable variation in the statements.

In his preamble, Professor Yorke notes that ‘Whilst benchmarking can relate both to developmental work and to regulation, the subject benchmarking exercise sponsored by the QAA leans towards the latter’. It is in the context of regulation that Professor Yorke examined the performance criteria and learning objectives contained in the subject benchmark statements and reflected upon their implications for assessment in the context of inspection through the process of Academic Review, the model for which had been published some months earlier by the QAA (QAA, 2000d). In particular, Yorke examined “the criteria that would be used to determine whether a graduate satisfied the ‘threshold standard for the award of an honours degree in the subject’”.

Yorke's analysis points to considerable diversity in policy development. In respect of the benchmarks in the pilot group, he notes that these are quite different from each other and individualistic: "The three pilot statements (chemistry, history and law) were not constructed to a general template and hence expressed expectations and performance criteria in their own particular terms". In respect of the benchmark statements in the first tranche, he comments in particular on how they described standards: "The benchmark statements are broad in character since they have to cater for variety in the approach to subject disciplines and, in some cases, trans-disciplinary spread. As a result, their relationship with standards is loosely coupled and open to interpretation". Commenting further on standards, he notes: "In all (statements), there is at least some opacity about the actual standards expected of an honours candidate, and in some the opacity is considerable". "That is not to say that staff in the subject disciplines do not have an understanding of the standards they expect of graduate level performances – it is merely to say that the standards are not articulated in (some) statements".

Yorke provides detailed information on the dimensions of variation within the benchmarks and also provides a more general summary which is repeated below.

*Variability of benchmark statements:*

- They vary considerably in how they present their material
- They vary with respect to the performance levels that they are trying to index: Some offer only threshold criteria some offer modal or 'typical' criteria and some offer criteria spanning the full range of performance
- the same words mean different things in different contexts and it is also possible that different words in different statements carry similar meaning.

Yorke, drawing on Sadler's argument that descriptive statements on their own are an insufficient basis for understanding what is expected in terms of performance, comments that the benchmark statements will have value only if they are used as the basis for discussion in subject communities so that those communities can themselves elaborate the meanings of the words used in the statements.(Sadler, 1989:119-141).

Turning now to Jackson's paper, it possible to read into this some of the writer's own amplification and elaboration of the policy initiative, which his 'insider' relationship with the Agency may have facilitated, since work on the Academic Review model within which the benchmarks were to 'fit' would have progressed in the period between the commencement of the benchmarking initiative and the point at which the first 22 subject benchmarks were published. Alternatively, the amplification may simply represent sense-making in hindsight. Certainly, it is evident from the interviews conducted with academics involved in the development of the benchmark statements that the context and explanation authoritatively stated in Jackson's paper appeared to have be only dimly grasped by those charged with developing the benchmark statements.

Jackson, like Yorke, provides in his paper a summary of the variation between the benchmarks in his paper.

### *Variability of benchmark statements*

- Benchmark statements vary in length between – 4 to 29 pages.
- Most outcome statements are written in an explicit form that would permit performance criteria to be created to enable achievement to be measured.
- About 30% of outcome statements have some elements of the statement that are not written in an outcomes format that would permit performance criteria to be created to enable achievement to be measured.
- The knowledge outcomes of benchmark statements define in very general terms the subject content for the curriculum. About 30% of statements have defined the knowledge base in more detail. Nearly half the statements list themes and topics that a curriculum is likely to cover and about 40% describe the principles on which a curriculum might be based.
- About half the statements identify between 20-30 skill outcomes but there is large variation in the number of skills identified in individual statements - 7 to 50!
- Nearly half the statements describe in some detail the teaching learning and assessment strategies that characterise the subject.
- About 60% of statements provide explicit and comprehensive performance criteria that address all or most of the generic learning outcomes identified in the statement, but 20% of statements provide only very general performance criteria.
- About 30% of statements provide three levels of performance criteria (excellent, modal and threshold). Most of the remainder provide two levels - modal and threshold.

Jackson makes the same point as Yorke about the development of meaning arising through debate within disciplinary communities, but also points out that the policy intention of making standards explicit to a range of audiences has been lost: “The intention has been to promote ownership for the statement within the subject community by encouraging benchmarking groups to create information that is meaningful to their subject(s) within a very broad guidance framework set by QAA. The strength of this approach is that subject communities can represent the characteristics of learning and achievement in language and constructions that is meaningful to the members of the community. The downside is that it results in considerable variations in the

content of such information that will affect its value and use". Note that the Dearing report envisioned benchmark statements as setting standards that would be accessible and widely understood, ie outside academia, as this extract from chapter 10 makes clear.

*10.62 We have been impressed by the approach that has been attempted in Australia, and share the view that there is advantage in awards reflecting a national approach to standards. We consider that national recognition and standing of UK programmes is to the advantage of all those concerned about higher education. The evidence received from employers shows a wish for threshold standards in awards. For example, the CBI, among other bodies, urges that learning outcomes be explicitly stated: 'some learning outcomes must be made compulsory in the form of threshold standards for degrees. The threshold would include key skills as well as knowledge/technical skills to an appropriately high standard. Public funding would be dependent on institutions ensuring these thresholds. (NCIHE para 10.62)*

*10.63 We conclude that UK awards at all levels, and especially the first degree, must be nationally recognised and widely understood. (NCIHE para 10.63)*

Both Jackson and Yorke identified a range of opportunities for further development by disciplinary communities to improve the utility of the benchmarks drawing attention to the considerable further work that would be necessary to achieve such utility.

Both researchers are pointing to is what is sometimes referred to as 'an implementation gap', that is, a gap between the expressed goals of the policy and the actual policy outcomes. ie where the broad agreement reached at policy formation level has not been translated in a consistent way, perhaps because it could not be understood in the same way by participants from different backgrounds with different perspectives. Both writers comment on the problems of translation of the policy initiative by the benchmark groups.

Yorke recognises contextual occlusion (Trowler, 2002:145) in the policy formulation stage when he says “many important matters of implementation had been set aside”, and he provides a list of everyday academic contexts wherein those who would be expected to make sense of the policy were offered no guidance. Jackson points to oversimplification and assumed homogeneity of those contexts. The following observation by Jackson is particularly pointed: “The QAA policy framework is predicated on an outcomes-based approach to the promotion and assessment of learning, but a significant number of HEIs have yet to adopt this approach” . This is a stark instance of assumptions embedded in the policy statement which are unrepresentative of practice on the ground. Contextual occlusion, oversimplification and technical rationality are features of the analyses of the benchmark initiative offered in these two papers.

Coincidentally, a statement was published by the QAA in their April 2000 Bulletin *Higher Quality*, a little before the first tranche of statements was published and the Jackson and Yorke papers appeared on the LTSN website. That statement provided a revised purpose for the benchmark statements. No longer were they to be seen as a tool to be used within inspection, that is , “as a means of determining whether the intended learning outcomes of individual programmes are appropriate” (QAA, 2000(April):7). But rather from this point forward they were to be considered as ‘referents’ for teams in the development of their own programmes. This statement represents a further significant shift in the policy intention under the stewardship of the Agency.

## **5.5 Unanimity/diversity of policy development: results of a limited survey of academics to ascertain practitioner views on the value of the initiative**

In the methodology chapter, chapter 3 I stated my intention to conduct a limited survey of academics within the same disciplinary areas as those covered by this study, across a range of institutions in the UK. The results present a limited and partial snapshot about the attitudes towards the initiative of the small number of academics who took the trouble to respond to the questionnaire.

The survey was undertaken in August and September 05. It was conducted by e-mail. The initial response was poor and the questionnaire was sent out a second time by e-mail to the same respondents. In total 6 responses were received in response to 60 e-mail requests, each of which was administered twice. Two of those responses consisted of a decline to complete the questionnaire, however, the comments made are themselves are of interest in the context of the survey and are shown separately in this section. I administered the questionnaire a third time, this time by post and completely anonymised. This was because one of the respondents in the first tranche of e-mailed responses had suggested some anxiety about anonymity, a feature not possible in the e-mailed survey. Nine responses were received in response to the posted questionnaire. The grid below shows the details of administration of the questionnaire. The first column shows that ten questionnaires per disciplinary area were e-mailed to academics at three separate specified institutions. The second column shows the same exercise conducted with a different selection of academics at a different selection of institutions, this time



administered by post and enclosing a stamped self addressed envelope. The third and fourth columns attempt a breakdown, with unsatisfactory results. The grid therefore simply summarises the process of administration.

**Table 5.9 administration of the benchmark questionnaire**

Sent by e-mail x 2	Sent by post	Response	Breakdown
<b>Theology 10</b> 4 Chester 3 Lampeter 3 Mchr <b>Chemistry 10</b> 3 Mcr 4 York 3 Ljm <b>Biology 10</b> 4 Ljm 3 York 3 Sunderland <b>Physics 10</b> 4 Mchr 3 Bristol 3 Ljm <b>English 10</b> 3 Sunderland 3 York 4 lampeter <b>History 10</b> 3 Sunderland 3 York 4 Ljm	<b>Theology 10</b> 4 Hull 3 Lampeter 3 Stirling <b>Chemistry 10</b> 3 APU 4 Keele 4 Hull <b>Biology 10</b> 4 Lincoln 3 Central Lancs 3 APU <b>Physics 10</b> 3 Hull 3 Central Lancs 4 Keele <b>English 10</b> 3 APU 4 Hull 3 Keele <b>History 10</b> 3 APU 3 Keele 4 Stirling	a Chemistry ** b English ** c English ** d History ** e Biology ** f Theology ** g post * h Chemistry post i post * j Chemistry post k post* l post* m theology ** n post* o post*  ** HEI identification withheld by researcher  *No indication of disciplinary area or HEI	Chem. 3 English 2 History 1 Biology 1 Theology 2 Not known 6  <div style="border: 2px solid black; padding: 5px; width: fit-content;"> <p><b>e-mail</b>  <b>60 sent x2</b>  <b>6 returned</b></p> <p><b>post</b>  <b>60 sent</b>  <b>9 returned</b></p> </div>

The following is the questionnaire which was used in the survey, annotated with the results received. Note that two respondents did not complete the questionnaire but provided comment and these are included after the grid.

**Table 5.10 benchmark questionnaire –annotated**

	<b>BENCHMARK QUESTIONNAIRE</b> <i>You can answer yes/no/to some extent or can give a fuller comment in box provided if you wish.</i>	Yes	No	To some extent
1	<b>Are you familiar with the subject benchmark for your disciplinary area</b>	Bdgjkel mo		ahin
	<i>Other comments:</i> <b>a</b> not very much help from me I am afraid – not very familiar with this scheme best regards amb <b>b</b> It made us think afresh about our provision <b>h</b> There are no benchmarks for forensic science – we use a combination of those for chemistry and biology			
2	<b>In your opinion, has benchmarking academic subjects made a positive contribution to the discipline</b>	Dilm n	akco	bghj
	<i>Any further comment here</i> <b>d</b> Clarifies the basic minimum of coverage a sound History degree should have. Ensures comparability of coverage without being too prescriptive. <b>j</b> We sometimes used the benchmark as support for changes to courses ie (to ask the question) is this consistent with QAA			
3	<b>In your opinion, does the benchmark for your disciplinary area make more explicit the standards of attainment</b>	bilm	ano	Dghjk c
	<i>Any further comment here</i> <b>d</b> Only in the broadest sense. <b>j</b> We previously benchmarked standards to our professional body (RSC) and their criteria for course accreditation			
4	<b>In your opinion, has the benchmark made a positive difference to the provision in your department</b>	l	cno	abdkm
	- <b>Has it contributed to enhancement of the curriculum</b>	l	Bdhij Kcm no	abg
	- <b>Has it contributed to enhancement of learning and teaching</b>		Bdgh ijklcn mo	a
	- <b>Has it contributed to enhancement of assessment</b>		Dgh Jklen o	abim
	- <b>Has it contributed to setting of standards</b>	lm	dkco	Abghij n
	<i>Any further comment here</i> <b>b</b> We re-wrote our degree to conform to the benchmark document for English, but following it closely forced us to compromise about some of our provision eg as level 1 is genre-based we couldn't offer an American literature module in the way we would wish as it is needed by the American Studies programme <b>d</b> The History Benchmarks have been accepted by historians because they are a broad brush statement of the nature of the History discipline. They do not descend into the micro-management that increasingly threatens academic initiative and the presentation of an enjoyable and stimulating subject. <b>i</b> Irrespective of benchmarking, University decisions have made negative difference to curriculum and learning and teaching in my personal opinion <b>j</b> As above, as part of our rationale for introducing change we would back up these changes by reference to the benchmark (and other) statements <b>k</b> I helps get through QAA. That's all.			

5	<b>Are you familiar with the intention now for the initiative to be developed into a 'recognition scheme' for emerging disciplines</b>	gho	Abdi Jklcm n	
<i>Any further comment here</i>				
6	<b>Do you have an opinion on this latest development of the benchmarking initiative you wish to comment upon</b>	dn	Abgh Iklcm o	
<i>Any further comment here</i> <b>d</b> A worrying development. More bureaucrats supervising the people who will actually develop new subject areas? <b>j</b> Id say there has to be some strong evidence of the educational worth of existing statements before producing any more				
7	<b>Overall, in your opinion, has benchmarking been a useful initiative.</b>	gil	jco	Abd k mn
<i>Any further comment here</i> <b>h</b> I have mixed views on this <b>i</b> yes, nationally it leads to consistency of approach and encourages examination of practice <b>j</b> Not particularly useful. I suppose it provides some sort of framework but I cant say that it has driven changes to our practice. Of course it is referred to in our programme specifications, but who reads these (worth a survey)? Overall its something that we used as a credibility tool but which doesn't necessarily mean that we agree with what it actually says. I would also say that consultation on its (the benchmark statement) content and the rationale for selecting the benchmark group were respectively inadequate and lacking transparency <b>k</b> It has limited bureaucratic uses				
Respondent e Can't really answer as I have never heard of the QAA Professor in the Dept of Chemistry at the University of xxxx				
Respondent f I'm simply too ignorant of things to offer an informed opinion Theology Department, Univerisity of xxxxx				

One interesting feature of the results is the difference in the responses to questions about the benchmark initiative in respect of its perceived value to the discipline generally, and responses about the benchmark and its value in respect of the respondent's own department. So that whilst 9 out of 13 respondents answered 'yes' or 'to some extent' in response to the question relating to the positive contribution to the discipline generally, responses to questions about positive contribution to the curriculum, learning and teaching and assessment in the respondent's own department, clustered strongly around 'no' with a much smaller number answering 'to some extent' and only

one respondent answering 'yes' to any of those three questions listed under '4' in the questionnaire.

There were two questions about standards in the questionnaire. The first asked whether respondents considered the benchmarking initiative had helped make the standards of degrees more explicit. The second asked whether the benchmark initiative had contributed to the setting standards of degrees in the respondents' own department. To both questions about standards, respondents tended to chose the 'to some extent' option: 46% and 53% respectively. Only 15% answered an unequivocal 'yes' to the question "had the benchmark contributed to the setting of standards in your department".

When the results are presented in the following formats, focussing explicitly on questions that are specifically about respondents perceptions about the benchmark initiative, then positive, negative and ambivalent perceptions of the initiative become apparent: the ratio of 13:46:30 is revealed where 13 is the sum of positive comments about the initiative, 46 is the sum of negative comments and 30 is the sum of ambivalent comment: 15% positive, 52% negative, 33% ambivalent.

<b>Table 5.11 Academics comments on the benchmark statements</b>				
	yes	no	some extent	total
1 familiar with the BMS for your disciplinary area	<b>9</b>	<b>0</b>	<b>4</b>	<b>13</b>
2 bms made a +tive contribution to yr discipline	<b>5</b>	<b>4</b>	<b>4</b>	<b>13</b>
3 bms make more explicit standards of degrees	<b>4</b>	<b>3</b>	<b>6</b>	<b>13</b>
In your department, have				
4i bms contributed to enhancement of curriculum	<b>1</b>	<b>10</b>	<b>2</b>	<b>13</b>
4ii bms contributed to enhancement of L&T	<b>0</b>	<b>12</b>	<b>1</b>	<b>13</b>
4iii bms contributed to enhancement of assessment	<b>0</b>	<b>9</b>	<b>4</b>	<b>13</b>
4iv bms contributed to setting of standards	<b>2</b>	<b>4</b>	<b>7</b>	<b>13</b>
5 familiar with intention re a 'recognition' scheme	<b>3</b>	<b>10</b>	<b>0</b>	<b>13</b>
6 overall, has bms been a useful initiative	<b>3</b>	<b>4</b>	<b>6</b>	<b>13</b>
Overall scores for questions 1-9	<b>25</b>	<b>56</b>	<b>34</b>	
Recalculated removing scores for questions 1&5	<b>13</b>	<b>46</b>	<b>30</b>	

### *Commentary*

In this chapter I have sought through a critical and analytical reading of chapter 10 Qualifications and Standards of the Dearing Report to draw attention to the constructions utilised to present particular impressions of HEI's stewardship of academic standards. I have proposed that chapter 10 be viewed as an example of a development discourse on academic standards as described in chapter 3. That is, that it coalesces particular ideas, favours some interests over others, using linguistic devices to put forward a particular apparently neutral and apolitical view about the stewardship by higher education of the standard of awards. I propose on the basis of this critical reading therefore that the version of HEI's stewardship of academic standards put forward in chapter 10 is unreliable.

I have also demonstrate that there was not unanimity about policy intentions between the NCIHE and the QAA, nor was there within the Agency itself a consensus about what was expected to be produced and how the expert teams were to be guided in their task in a way which might lead to unanimity of policy development. (This provides the response to research question 1).

I have further demonstrated that there was considerable confusion amongst those on the benchmarking groups as to their task, leading to variation in both policy intention and policy development. In particular in section 5.4 I have demonstrated that there was considerable variation of policy development, in that there is evidence in the sample studied that the tasks adopted by the benchmarking groups differed from each other. I have also demonstrated that there was variation in what was being benchmarked. My findings are supported by work undertaken by other researchers which demonstrate considerable variation between all the benchmark statements that were produced in the pilot and the first two tranches of the benchmark initiative. Since there was no intervention by QAA to influence the work of the final tranche of benchmark groups, it can be taken that the variation pointed to was a feature of the second tranche and thus the whole undertaking. (This provides the response to research question 2).

Drawing on a set of questionnaires administered to academics in the same disciplines as those selected for this study, across a number of HEIs, I propose that on the limited survey conducted, and on the crude indicators used, the

results point to the benchmark initiative not being valued or respected by those practitioners who returned the questionnaire.

Chapter 5 has also demonstrated that the policy trajectory it was characterised by shifts and changes.

## Chapter 6

### DISCUSSION AND EXPLANATORY INSIGHTS

In this chapter, I consider a number of issues the cumulative impact of which resulted in considerable variation between the intentions of the policy initiative and its outcome.

It is clear from chapter 5 that the issue exerting the most influence on the policy process was the different ideologies which were brought to bear at different points of the policy trajectory. The world views of the NCIHE and the benchmarking groups can reasonably be expected to be very different. Technically the role of the QAA was to oversee the development of the policy intentions referred to it by the NCIHE. However, the philosophical position of the QAA was ambiguous. The Agency may have leant, and increasingly so across the period of the policy development, toward that of the benchmarking groups. This is suggested since there seemed to be considerable latitude operating in the benchmarking groups favour as they sought to devise benchmarks not capable of being utilised in a TQI type inspection regime. Alternatively the undertaking once under the control of the QAA may have been an example of ‘muddling through’ considered by Lindblom to be a frequent mode of progression through the policy process (Lindblom, 1968). Other explanations are possible and in reality are likely to be more layered and complex than suggested here. In terms of the professional values of the benchmarking groups, interviews with academics showed that they believed their professional principles and ideology to be threatened and were defensive and suspicious of the QAA and of the initiative. Indeed, the interviews I conducted showed that a



common reason for joining a benchmarking group was motivated by a strongly felt imperative to preserve educational, professional and disciplinary values, and to resist intrusion from the state.

*...and we thought there would be all these sort of Botany Professors, wheeled out of some store room, who had not taught for thirty years and certainly did not know about modern biology education. There was this sense that we wanted to be in on the act. When I got to the first meeting I found that that was the motivation for most of the group – it was almost like – if we do not do this – somebody else is going to do it, so we have to do it and make a good job of it .*

*Respondent 18*

*And as I keep saying it is really, and it is the critical point almost, that we were damn sure that if anyone was going to do it was at least going to be us and not some*

*other body selected from elsewhere. Respondent 16*

*An awful lot of my colleagues in the faculty of arts were simply trying to resist all this, rather than responding to an imposed task. Respondent 7.*

*A Absolutely. It is a defensive statement. You can read it as: someone is trying to kick us around. And us saying : no, we are not going to be kicked around. This is what we are going to do and this is what we think. We were pretty determined. Respondent 4*

There is much in the interviews which demonstrates that the benchmarking groups were concerned about the purpose to which the product of their work would be put and that their conjecture about those purposes were ideologically abhorrent to them. It is clear also that there was considerable mistrust of the QAA itself which was seen by many members to be a tool of government. Some members of the benchmark groups were especially pessimistic about the initiative, believing that benchmark groups were being

duped into being instrumental in bringing about changes that would harm the subject or harm university education.

*“Once we put anything into boxes we had had it. We were absolutely adamant that we would not create any boxes that could in effect be used to destroy the subject. (Respondent 4)*

*“Some people refused to join the group on the basis of what they thought it was about was a handcuffing of universities by themselves, in other words they were being duped. There were deep suspicions around the exercise. (Respondent 11)*

<b>Table 6.1: Use to which the benchmarks would be put</b>		
<b>Chem.</b>	Well that was a big talking point because one thing we want to emphasise was that we were not preparing a national curriculum	<b>1.</b> Old
<b>History</b>	Q. There was a worry I think from what you say, about the way that it might be used. And that must have coloured your approach. A. That's why we were so against the boxes. Once we put anything into boxes we had had it. We were absolutely adamant that we would not create any boxes that could in effect be used to destroy the subject. We believed that if you reduced history to a series of boxes and if this QAA was as powerful as it looked like being and it could tell vice chancellors what to do. Don't forget, I worked for QAA in the auditing process, you could see that the dangers were all there. The moment has probably gone. The moment that Randall saw, for a completely new university system which had been bureaucratised and structured around benchmarking is never going to happen	<b>4.</b> Old Uni
	At the core of the debate around the benchmark statements was how the benchmarks would be used in the methodology which QAA had not at that time yet developed. And I think what it is important to remember is that the benchmarking process started with us, before work had begun on the national qualifications framework and significantly before the new kind of methodology assessing teaching – subject review or not - and been developed. In other words we were writing key documents in a process which at that stage was not specified.	<b>5.</b> Old Uni
	And I think the issue of the review process ( <i>inspection of the subject planned by QAA to replace TQA within which the benchmarks would have a role</i> ) and trialling, which strictly speaking was none of our business, but which we felt could not be divorced from what we were doing and was part of the whole process. I had no experience of being an inspector and was not at the centre of those concerns, but there were a number of people who were and they were preparing to let their names go forward to be inspectors and they were very worried about it. The issue of practical workings of subject audits were never resolved.	<b>6.</b> New
<b>Theology &amp; religious Studies.</b>	Another difficulty was that there were these 41 or 42 subject areas... raised concerns that a national curriculum was in QAAs thinking, a small number would have been more acceptable and would not have raised that concern, but 42 was sufficient to cause some concern about a national curriculum.	<b>7.</b> Old Uni
	No one knew what the statements were going to be used for.	<b>8.</b> Old
	My take on the policy was that when the policy was first announced, it was not clear how it would get un-packed and there probably was a suspicion that there was going to be an attempt to achieve a clearly defined national curriculum in each subject area that would be so sharply delineated that it would give very little room for manoeuvre for individual institutions or distinctiveness of operation and indeed would call into question the whole matter of academic integrity of individual teachers and researchers and the institutions in which they were located so there was naturally going to be a lot of nervousness about that.	<b>9.</b> New
<b>English</b>	The subject community were nervous about it, especially about the possibility of it being part of the development of a national curriculum. We thought that that was what it was about. And I still think that might have been the initial idea. And I think that idea was strongly influential within the group, that we made it so that it was impossible, for it to be that sort of thing. We chose our language carefully and made sure that we had a very flexible statement.	<b>10</b> New Uni
	We were never quite sure what they were going to do with it. They kept reassuring us but remember that this following TQA regime. What I was there doing, what we were all doing was to ensure that we did not end up with a national curriculum. There is a danger about the way it might be used in inst especially by the quality assurance department. A QA department might use it in a way that it was not to be used. It looked like a national curriculum. And I suspect that the phrase 'national curriculum' that idea, was the one that was haunting benchmarking and which kept up time after time: prescription; no curriculum, uniformity and exclusion of a number of areas of the discipline.	<b>11</b> Old Uni
<b>Physics</b>	Q. Was it in your mind how benchmark statements might be used? Yes absolutely. Yes we were very conscious of that and that was part of the argument about why we did not want to be a prescriptive as the chemists had been.	<b>13</b> Old Uni
	QAA presumably asked us to do this for their own reasons, whatever those were. I have assumed that the reason they asked us to do this was so that in a situation when they review physics departments and they wanted something they could bash very poor departments over the head with to say look you are not doing a proper job, they could use this document to say, against this ? you are failing.	<b>14</b> Old Uni
<b>Bio sci.</b>	I was also initially worried, like many people that it would eventually boil down to some form of national curriculum. We wanted it to be as unrestrictive as possible, as we respectably could. There was a lot of discussion about how it might be used. Such as : what happens if we say something and then informed that the university of whatever, does not do that?	<b>16</b> Old Uni

The responses from the early benchmark groups were particularly vivid about that nervousness. Note that a member of the pilot group (respondent 4 – in fact the first group of the subject benchmark groups to make its statement available to the QAA) believed that the whole of the present order of higher education was threatened to be radically altered by the imposition of the benchmark statements. (Table 6.1 *Use to which the benchmarks would be put*). The suspicion that the Agency would resort to devious or actual dishonest tactics to effect changes to HE was evident in a small number of the interviews.

A common view amongst the respondents was that the purpose of the benchmark initiative was associated with the development of a national curriculum for HE - note that the national curriculum for schools was still-recent history at the time the benchmark groups were meeting. They were further concerned that the benchmark information would be used within an inspection regime similar to the Teaching Quality Assessment (TQA) regime. A regime which many perceived as being unfair Mistrust was a feature of the relationship generally between the benchmarking groups and the Agency.

It is also possible to identify shared meanings in the interview extracts when these extracts are considered together. Fran Tonkiss talks about the language and shared meaning which those in 'expert' professions use. Such expert language she posits, marks out a field of knowledge and confers membership and authority. The language which a professional group uses can therefore be seen to represent a form of tacit knowledge and shared values which those professionals draw on. Such systems of language and discourse represent that professional group's versions of the social world. (Tonkiss, 1998:248-9).

When the selection of quotations is read from this perspective, there can be discerned certain themes. There is a theme about defence of the status quo and in particular of the privilege of academic freedom which the group enjoys. There is a discernible use of dramatic and emotive expressions to describe the damage that might result were the control and stewardship of the university curriculum be wrested from them. Note that the chairs, in particular, were representatives of the 'elder statesmen' or 'tribal elders' of their disciplinary communities and there can be expected to be considerable authority and force in their values and beliefs, vis a vis their own disciplinary communities.

Respondents also describe their main defensive tactic, ie to ensure as much latitude as possible. Phrases to describe their endeavour in this respect include an abundance of words such as: non-prescriptive, unrestrictive, flexible. I am suggesting that these extracts offer a view of a shared justification of actions taken to contest the intention of the initiative. They resonate with the comments of Young that there are areas of academic knowledge which involve assumptions that they are more 'worthwhile' than others, and are viewed as 'high status'. In this he is contrasting academic disciplines, such as are represented in this study, with vocational disciplines. To quote directly from Young again "If the criteria of high-status knowledge are associated with the value of the dominant interest groups, particularly the universities, one would expect maximum resistance to any change of the high status knowledge associated with academic curricula (Young 1971: 34-36). This indeed appears to have been borne out in this study.

There are some more prosaic explanations for the defensiveness of benchmarking groups. They may have been genuinely unclear about the precise remit. Had they had a clearer view of the purpose to which the benchmarks would be put, in particular, if the qualifications framework had, as originally intended, been constructed so that academics had a clear context for their work, then their suspicion and defensiveness may not have been so great and the product of their work may have had greater utility than at present. This is the subject of the next section.

### ***The rush to complete the BMS initiative – cart before the horse***

There are features of the handover of the policy task from the QAA to the benchmarking groups which had an influence on the lack of unanimity about policy intentions and policy development within the benchmarking groups. The first of these is alluded to above, and is also associated with the ‘fairly tight timescale’ within which QAA was to progress the Dearing agenda.

The QAA had been given a very heavy agenda by Dearing, and only a short time scale within which to establish a new system of national quality assurance. That these pressures were recognised by the QAA is evident from the following two quotations from the Agency’s own bulletin for HE, Higher Quality No 2:

*“The report sets a challenging agenda for the Agency” (pp1)*

and

*“The Dearing Report called for the new quality assurance system to be up and running within three years. This means that development, consultation and trialing will have to take place to a fairly tight timetable.” (pp2)*

Whilst many of the Agency's staff were drawn from HEQC and the funding councils there were also new and powerful individuals at senior levels within the Agency in the early days after the NCIHE reported. This may have meant that there were different values operating as well as underdeveloped organisational arrangements and unstable professional relationships. These factors may have militated against optimum efficiency in the Agency's early work.

Against the above there was considerable external pressure on the Agency to press ahead with the Dearing agenda. Recommendation 25, in particular, implied that the Agency should prioritise the development of benchmark information on standards. The extract from Higher Quality No 2 below makes clear there was such pressure, but also makes clear the planned, logical sequence of development envisaged by the Agency: the architecture of the qualifications framework was to be created first and benchmark information was to be developed subsequently to align with the levels in the qualifications framework. Fig 7 *Depiction of the Agency's plans for the development of its 'policy bundle' for academic standards*, illustrates the points being made about the planned developments and described by the Agency in Higher Quality No 2 .

*"there are four main strands to the early development work being undertaken by the Agency....The **first** strand concerns the **qualifications framework**...The **second** strand concerns **benchmarking information** to enable subject threshold standards to be established...) The **third** strand involves the development of the Dearing proposals for an **enhanced role for external examiners** who would report to the Agency on the extent to which provision met subject threshold*

*standards and programme objectives...The **fourth** strand is the development of the various **codes of practice** that Dearing proposed should be the basis of future institutional reviews” (QAA Nov 97 p 2). (Author’s emphasis).*

In the event, the Agency abandoned the planned sequence identified for the various elements of the NCIHE agenda and prioritised the benchmark statements ahead of everything else. What this meant is that the architecture of the qualifications framework intended to identify the various levels of qualifications and into which the benchmark information on standards of the honours award would fit was not in place prior to commissioning the benchmark information. Rather like trying to fit the windows before the walls had been built.

Had the planned logical sequence of events been followed then the benchmark groups would have had the context of the qualifications framework within which to develop benchmark information on standards. As it was they were operating in a vacuum and as extracts from the interviews in Table 6.1 *Use to which the benchmarks would be put* show, those on the benchmark groups were very concerned about the way their work might be used once it was handed over to the Agency.

Part of the difficulty with the task can also be attributed to the ambiguity of key concepts and the ‘management-speak’ language in which the task was couched. I have touched on this matter earlier in chapter 5.



## ***Concepts underlying the initiative***

In the chapter *Policy: Processes and Issues*, I drew attention to literatures which pointed to the difficulties created within the policy process when central concepts underpinning policy initiatives were unclear. Miller and Green make the point that ideological and philosophical perspectives held by policy makers may mean that there are underlying tacit assumptions which influence their understanding (Miller and Green, 1999: 1-10). Lingard and Garrick noted in their policy trajectory study on the implementation of a national policy initiative to improve social equity through access to educational opportunities in multicultural Australia between 1994 and 1995 that key concepts had different meanings to different constituencies involved in the development of the policy, and further, that there was an instability in the shared meaning of those key concepts among key audiences for the policy initiative (Lingard and Garrick, 1997: 57-178). I would argue that the key concepts of 'benchmarking' as applied to academic standards was similarly unstable. Respondent 17 states: "a lot of us felt that the whole concept of benchmark standards was somewhat debatable and something that we worried about". Respondent 19, the Assistant Director at QAA with direct responsibility for the initiative makes exactly the same point when he says:

*"and I think if there had been a slightly more circumspect way of describing what the committee wanted rather than 'benchmarking', then much of the early difficulties that the Agency experienced with the pilot groups could have been avoided."* Respondent 19

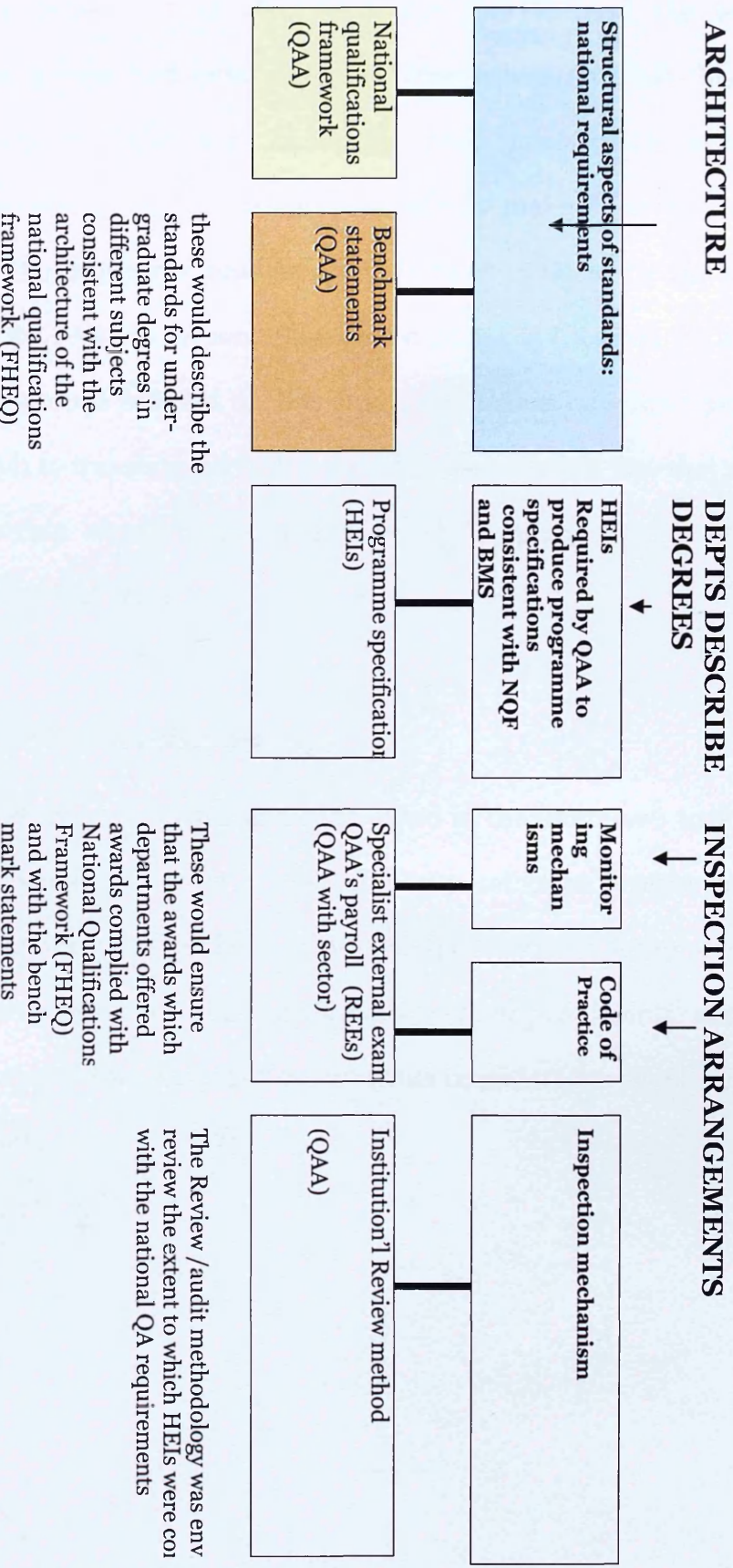


Fig 7 Depiction of the Agency's plans for the development of its 'policy bundle' for academic standards

However, perhaps the concept which was especially contentious was that of academic standards. It is clear that the NCIHE and the academic benchmarking groups had quite different perspectives on what this central concept meant. In Table 6.2 *Standards- their problematic nature: an academic viewpoint*, a number of respondents make clear that in their (expert) view the concept of academic standards is problematic *per se*. The following section seeks to demonstrate what it meant to those on the academic benchmarking groups selected for this study, and shows how their perception made it difficult to translate the task referred to by Dearing in a way that matched both the Dearing requirements and their philosophical and professional understanding of that term.

### ***Standards – what academics say***

One of the matters respondents had been asked in the interviews to comment upon was the extent to which it was actually possible to capture academic standards in the way that had been envisaged in the NCIHE recommendation. The comments captured in Table 6.2 *Standards- their problematic nature: an academic viewpoint* that almost all respondents considered such an endeavour to be problematic.

**Table 6.2 Standards - their problematic nature: an academic viewpoint**

Chemistry	<p>What are standards in chemistry? And very rapidly the panel came to the view that standards were inseparable from content in chemistry. Well the other thing that has to be borne in mind is that an insistence of the QAA was that there should be no negative statements included in the benchmark. So even at the bottom end of the standards statements, it was not permitted to say 'does not know this, or does not know that'. To create all those levels required quite a lot of ingenuity so that they should all be positive statements.</p>	<p>1 Old Uni</p>
	<p>Because we tried to be all-embracing, we were conscious that the words we used would be interpreted by different people in different ways. 'Basic level of understanding' what does that mean. So I think that was part of the scepticism. You could write these words down, but what did they mean? Without going into enormous detail ...understand the second law of thermodynamics... what do you mean by understand? Can you repeat it? Do you know what it means? Can you use it? So I think that is part of the problem generally and academics are concerned about writing things down which they know does not achieve what the overall objective is, simply because of the limitation of words. I mean, the whole question of standards itself is difficult. What do we mean by standards? Its one of those words that people throw about. In fact what we were planning to do was to use words which we felt could be interpreted sensibly by the chemistry community. We were very conscious of the fact that we were going to write things down and people were look at them and say – what does that mean.</p>	<p>2 New Uni</p>
	<p>There is a sense that we are trying to define various categories of degree without saying so, because basically, the QAA wanted us to define the threshold. Essentially it was left open to the various groups to define what the threshold was.</p>	<p>3 New Uni</p>
History	<p>We certainly did not want to make a statement about the threshold standards, which we thought was a lot of nonsense. The only way we could understand it was – what you need to do to get an honours degree in history, a sort of minimum standard, you know. I have no idea how useful it has been to other subject areas. I would not want to criticise what others have done.</p>	<p>4 Chair Old</p>
	<p>I also think, it says (in the benchmark statement) that there is not one way to do things, so it is up to the department to say the way the do things which assure standards.</p>	<p>6 New</p>
Theology and Religious Studies	<p>I did not believe it was possible to establish absolute standards. We work on a set of qualitative judgements, it is hard to pin down. This is not only true of TRS but of a whole range of subjects. Many academics will recognise that a mark is a symbol, and that judgements are supported by criterion referents.</p>	<p>7 Old Uni</p>
	<p>In terms of the standards, the statement, I agree has not much concrete bite. But we did not want to impose our standards on other departments.</p>	<p>8 Old</p>
	<p>I guess I would want to remark at this point that if a careful scrutiny were done of what I will call the 'academic escalator' to apply levels to national curriculum subjects right the way through the 4 key stages, and the various level descriptors which have been used to characterise the different 10 12 levels involved –if an analysis of that was done, and an analysis was also done of the various aspects of the certification process which are involved in students in school producing records of achievement, and at the same time we looked at the language criteria that are used in respect of A level – I think we would find that in many subjects there was a lot of language that gets used much earlier in the students development which is common to that which is also used for 2 and3rd year undergraduates. And this is where I think the whole educational process and the auditing which has gone on in relation to it has not been as consistently joined up in its thinking as it really should have been and I feel very strongly about that in all sorts of ways.</p>	<p>9 New Uni</p>
English	<p>I do not know what was in QAA's mind. I think defining standards is problematic. Academics will typically say: I don't know how to define a first, but I know it when I see it. My own view is that that is not good enough. I think academic should be able to reflect on their practice and be able to define what is an English degree. Having said that it is difficult to breakdown systematically, creativity and originality - in English, we are looking for that, which is one of the reasons why we avoided talking about a first or top in English. We do not think that you can say that standards can be certain levels of knowledge - it goes beyond that.</p>	<p>10 New Uni</p>
	<p>I think that part of the benchmark statement on standards would not, in the context of a TQA (Teaching</p>	<p>12</p>

	<p>Assessment) in a department – I don't think it could be held against the performance of students in a way that would measure their performance. There is also I think an endemic problem within English, in the sense that if you go to English departments and you read mark scheme descriptors, they tend to be couched in very general ways because they are not about the achievement of specific knowledge outcomes of a quantifiable kind.</p> <p>So it is something about the nature of the discursive conditions under which assessment is conducted in English which is actually trying to capture a range of qualities across a very wide range of assessment</p> <p>Or are you really trying to discriminate between what is actually a good degree and one which is a less good degree, which for most people is the one between a 2.1 and 2.2. So there was that problem, but I am sure English was not the only one to wrestle with that problem.</p>	New Uni
	....there was a concern about there being a very simplistic view about standards.	13 Old
Physics	<p>It is difficult to set absolute thresholds because strengths can make up for weakness in other area. So there difficult. We found it difficult wrestling with threshold and model and what that really meant.</p> <p>Well it's a classic statement and I don't want to justify it or anything, but it comes with examining, internal, external, over a period of time, it becomes ingrained within you. You know what a first candidate is and v 2.2. is. You know it almost instinctively. Now that is a dangerous thing and I can understand people being by it. How do you know? What is it that defines these things? And I would be interested if this is the case academics in other areas, but yes, I do know I can recognise these standards. But trying to write down an exactly those things - is very difficult.</p>	14 Old Uni
	<p>Q Does that really mean that the standard of the award reside within the community of practitioners.</p> <p>A Yes. We are saying it is with the Institution. I think that we were talking about the institutional regulations or course regulations.</p>	15 New Uni
Biosciences	<p>*Q To what extent do you think that this captures standards.</p> <p>A I never quite know what standards means. That is not quite as facetious an answer as it might seem. It is a word that is banded around so much. The benchmark initiative has not been at all useful for standards because, it concentrates on people who just managed to scrape a third I mean that is what they are about – what you have to do to get an honours degree. Well I have never in my academic life ever seen such a student.</p>	16 Old Uni
	<p>Q. One question is – does this statement capture the standards of the degree.</p> <p>A I would have to say that it captures some of the standards. I am pretty convinced that what the benchmark can do is to enable you distinguish between someone who deserves a degree and someone who does not.</p>	17 Old Uni
	Yes and I think my view was that if there was some way of defining absolute standards that we could all agree to and then that was used in judgement of quality in institutions, then I could sort of live with that, but the fact that that was clearly impossible and that the benchmark statement was therefore going to be vague and woolly – it made it a waste of time.	18 New Uni

At the outset, the intention to establish benchmarks to measure academic standards drew strong criticism from the sector. The THES carried an article reporting on the Benchmarks and Threshold Conference organised for the sector by the Staff and Educational Development Agency at UMIST in Manchester on 7 December 1998. Speakers at the conference representing QAA “acknowledged that the task was more complicated than had been anticipated”, stating: “The more we get into the development the more we realise this is an extremely complicated process”. The article was head-lined

"Benchmark Plans are Unworkable" and included quotes from representatives of the QAA as well as academics and academic managers. Comments from the latter two groups were openly hostile towards the initiative. One quotation in the THES was a description of benchmarking as "an unbelievable simplification of what academics do" which "should be rejected on intellectual grounds" (THES,9.12.98).

Whilst academics appeared to share this view, an alternative reading of the above set of quotations is again of academics defending their practice, and conceding very little in terms of the key imperatives of the policy. Note that respondent 9 in Table 6.2 does suggest that there may well be a means of capturing standards more exactly through language, by calibrating the use of language over all the levels of education. Had the qualifications framework initiative commenced first, before that on benchmarking, then it is possible that the expert groups would have had the beginnings of such a structured system of language to use to frame their statements, rather than as happened, disciplinary groups defining standards in their separate and distinctive disciplinary terms, disconnected from other disciplinary communities.

### ***The shifting purpose of the benchmarks***

Throughout the period 1997-2002 the purpose, role and status of the benchmarks under the stewardship of the QAA changed a number of times.

Initially it was clear that the intention was that the benchmarks would be used within an inspection regime, with a new class of external examiner, Registered

External Examiners (REEs) reporting to the agency on standards in departments.

*“Verification of the attainment of standards on taught HE courses, at award and programme levels, and achievement of the programme objectives stated by the provider, will be undertaken by registered external examiners REEs), whose reports will form the basis of information to be published by the Agency (QAA, March 1998:3).*

*“One of the criteria for evaluating the benchmark information generated by the subject benchmarking groups will be the extent to which it allows the Registered External Examiners (REEs) to verify the attainment of standards(QAA, Mar 1998:12).*

Academic Reviewers, as those who were to carry out the proposed scrutiny process were to be called within the new process called Academic Review, would, it was planned, use the benchmarks in their judgements on standards at institutional level

*“In the new framework, it is envisaged that academic reviewers will use the benchmark statements to provide a basis for judgements on whether an institution is applying standards in its subject-specific assessments which are consistent with those applied elsewhere in higher education.... the reviewer is seeking to assess whether, overall, the attainment which the institution is expecting students to demonstrate for each level of qualification is calibrated on a basis comparable with the rest of the sector (QAA, May 99:6).*

Indeed, the timetable for development and production of the benchmarks had been dictated by the cycle of forthcoming TQI/subject review style inspection as the Agency’s bulletin makes clear (QAA May 99:6).

However, by the time the design of the inspection regime had been fully developed and published in the Handbook for Academic Review in 2000, the stated purpose of subject benchmarks had changed:

*“the statements are reference points to be used, as appropriate when programmes are designed, approved, reviewed and explained in programme specifications. More importantly the statements provide teaching teams with a focus for discussion on the aims and outcomes of programmes” (QAA Apr 2000).*

This statement implies that the status of benchmarks had been demoted in that benchmark information would be used not as an external measure of standards, as had been the original policy intention and emphasised in the governments endorsement of the Dearing report, but within HEIs own internal quality assurance arrangements. The change in tone between the statement in May 99 and that of April 2000 is particularly notable. The absolutism exemplified in the phrase: “each level of qualification is calibrated” used in May 99, gave way in April 2000 to a much softer definition of the purpose of the benchmarks, to: “ provide teaching teams with a focus for discussion”.

In March 2001 the Academic Review inspection regime launched in 2000, comprising the two elements: Subject Review and Institutional Review was withdrawn (the reasons for its withdrawal are described later in this study) and a new one constructed: Institutional Audit. The Handbook for Institutional Audit was published in 2002. By this time the nomenclature for benchmarking had also changed. No longer were they referred to as benchmark standards,



but as benchmark statements – a subtle but very significant change (QAA July 2002:1).

In December 2003, the QAA announced another and different role for Benchmark Statements - a mechanism for “recognition” of subjects offered in UK Universities. Its revised purpose was described by QAA as follows:

*“The recognition scheme will enable the Agency to:*

- *embrace subjects that lie outside the initial grouping of statements;*
- *involve newly emerging discipline areas;*
- *respond to subject communities that have already begun to prepare statements in their subject areas;*
- *formally recognise these when appropriate”(QAA, 2003: circular CL 03/03 Dec 03).*

This latest manifestation is a considerable distance from the original policy intention and in particular, appears remote from the original purpose of subject benchmarking set out at the beginning of this chapter. What benefits will be conferred, and upon whom, by this new turn of the policy initiative is not clear in the context of the original policy intentions.

### *Commentary*

In this chapter I have discussed a number of explanations for diversity of intentions and diversity of development at different parts of the policy trajectory. Taken together with explanatory accounts which emerged from the analysis and described in chapter 5, a full answer to research question 4 has

been provided. To summarise: *What explanations can be found for the divergence between policy intentions and policy outcomes:*

1. The conflation of the objective (to make the standards of degrees more explicit), with the means by which the objective was to be achieved (benchmarks), created considerable confusion about what was to be produced. Lack of clarity is likely to have facilitated any prospective neutralisation of the policy by the benchmarking groups.
2. The instability and lack of a shared understanding of the central concepts: ‘academic standards’ ‘benchmarks’ ‘threshold standards’ across the different audiences which contributed to the policy initiative
3. The re-interpretation by the QAA of the Dearing recommendation 25 so that the focus of the exercise became **subjects**, rather than as intended **awards**. Chapter 10 of the NICHE report focuses upon “the comparability and consistency of standards of **awards**”.
4. Prioritisation of the development of the benchmarks before the development of the qualifications framework, into which the benchmarks were to fit. An added significance of this is that the specification of the standard of an honours degree within the qualifications framework was to have supported the specification of the standards of other awards, so that there was improved

consistency across the portfolio of awards typically offered in the sector.

5. The slippage of terminology and policy purpose effected by the adoption of the term benchmark **statements** to replace the term benchmark **standards** which had been current since the Committee reported, until the publication of the pilot group benchmarks.
6. The slippage of intended purpose effected by the QAA so that benchmarks would not be used in judgements of standards, by examiners external the institute, but would be used as general 'referents' to be used internally in the development or review of programmes.
7. The volume of work referred to QAA by Dearing, the imperatives to complete a range of new initiatives within a short space of time, the newness of the organisation and possibly embryonic channels of communication across the Agency may all have inhibited fully effective operations.
8. The lack of clear expectations provided for the benchmarking groups
9. The mistrust which existed between members of the benchmarking groups in this study and the QAA, which might be representative of a general view of the sector toward the Agency, particularly after the

Dearing Report which systematically undermined the reputation of the sector.

10. The generalised concern by the benchmarking groups in this study about the purpose to which the benchmarks would be used.

I have sought to show, from examination of interviews, a shared belief held by those on the benchmarking groups in the importance for control and stewardship of the curriculum to reside with academics and to contest vigorously attempts directed at increased central government control. I have also shown defensiveness of benchmarking members toward some issues raised by the benchmarking initiative.

## Chapter 7

### CONCLUDING COMMENTS

*“...Implementation should not be divorced from Policy. There is no point in having good ideas if they cannot be carried out.*

Pressman and Wildavsky, 1973:143

*“Some would argue that having a formal policy decision is only the beginning of the policy process, and the critical thing is what happens as a consequence....does anything change as a result ? “ (Colebatch, 2002:15)*

#### 7.1 Preamble

The research aims as set out in chapter 1, were to provide a narrative and historical analytical account of the subject benchmarking initiative in order to elicit insights into policy formation and implementation. That narrative has been provided in chapters 1, 2, 3 and 4. The research questions were set out in chapter 1 and the responses to research questions 1- 2, have been provided in chapter 3 and 4. The response to research question 4 was provided in chapter 5. This final chapter deals with the outstanding research question: “what new critical insights about policy process can be deduced from the study”.

This chapter has three sections: the present ‘preamble’ section which contextualises the main section: key findings, and a final reflection and summary section. In total this chapter seeks to demonstrate that features revealed in this trajectory study enhance theoretical understanding of higher education policy processes, an audience for which I suggest is policy makers.

The insights revealed by this study cluster around the points made in the two quotations which head this chapter, that is

- policy which may not be able to be carried out
- whether anything changed as a result of the policy initiative.

In this study these two points come together. The policy could not be carried out, because the central concept relating to what was to be done did not have a stable meaning across the audiences involved in the policy. The task itself, apart from the slipperiness of the central tenet was also contended in conflicting and strongly held ideological philosophies: a technical-rational, and perhaps common-sense view of competency held by those on the Dearing Committee about those making the transition from HE to work, against a nuanced and problematic view held by those on the benchmarking groups which has as its key concern the nurturing of an individual's intellectual capital.

What has been revealed in this study is that the policy process, far from being a logical progression through a series of stages to achieve agreed outcomes, has been an ideological and political process concerned with a search for outcomes which did not affront the strongly held philosophical positions of a key set of participants within the policy process, whilst at the same time at least appearing to address the requirements of the policy objective. In fact the policy process effected a neutralisation of the policy objectives. To continue the chemical metaphor – the redundant by-product of that neutralisation process was a suite of 'benchmarks' that did not address the policy requirements and the problems it described but did consume the resources identified to address a set of matters which had been perceived to be a problem.

The term 'policy gap' does not adequately capture the point I am attempting to convey, since it implies that an outcome has fallen short of what was sought to be achieved, ie some things have been achieved and others have not. What I have attempted to describe is a policy process which has i) deflected its policy aims ii) resulted in outcomes which address those deflected policy aims but not the original aims iii) generated agendas which were not originally intended and may have little value for any participants or audience but which may mislead and divert scarce resources. I believe this is how the policy on academic benchmarking has concluded. The quotation from Dale in Chapter 1: that the State is assumed to be unable to contribute anything of its own to the achievement of desired outcomes, but it may unwittingly interfere with it seems apt at this point. (Dale, 1989:23)

A more general reflection in respect of the above in respect of the policy is that even where a policy initiative is not on the scale of benchmarking exercise, it will include within its process, on-going adjustment which has a cumulative impact capable of causing refraction of the policy intentions. That this is the case is supported by Reynolds and Saunders case study in which the authors observed that implementation of curriculum change arising from the 1981 Education Act in schools in England and Wales was characterised by negotiation, accommodation and tacit agreements as part of the implementation process as policy requirements were progressively applied in practice settings (Reynolds and Saunders 1985:198). Such adjustment is capable of creating an implementation gap, such that, even where the policy initiative is generally practical, and for the most part, able to be clearly

understood and not associated with issues of ideological contention, only a proportion of what was intended at the policy formation stage is actually effected. Indeed some elements will be quietly and deliberately set aside. A key feature of such negotiation and tacit agreement is that by definition it operates below the horizon of visibility. As Pressman and Wildavsky note in their examination of a social policy project in Oakland, USA: policy audiences “complain that good ideas are dissipated in the process of execution” (Pressman and Wildavsky, 1973: xiii).

However as Barkenbus notes, the evaluation stage of the policy process, where one might expect lessons to be learned is often a forgotten element. He notes that answers to simple questions such as ‘how has the policy worked’ and ‘how can we improve policy implementation’ while seeming to be essential in providing policy makers with necessary feedback to inform future decision making, are rarely treated in a systematic and thorough way as part of policy evaluation. He goes on to suggest why this might be the case.

*“However, when we place this phase in the political context of the policy cycle, the reason why evaluation doesn’t garner support becomes apparent: It could prove embarrassing to those who were responsible for formulating and implementing the policy. Once again, we must pull back from the assumption that decision makers function in a “rational,” non-political, setting. Instead, decision makers function in a political milieu where success is critical for re-election. This frequently translates into the perceived need to repress uncomfortable facts derived from impartial evaluation or the need to conduct evaluation in a context certain to show positive results. This tendency, along with a predilection for maintaining the status quo, also*



*explain why evaluations, no matter how carefully conducted, are often ignored, or shunted aside, by decision makers. (Barkenbus, (1998:7).*

The above is important since it suggests that the policy process can be:

- ineffective in producing the change which it seeks to effect
- wasteful of resources in the policy development process
- produce requirements which do not address the original concerns and priorities but do add to an accretion of requirements on organisations, which, if there is credence to the thesis presented here, will include requirements that add little or nothing, but detract from core functions.

### ***Did anything change as a result?***

Noting the Colebatch quotation at the beginning of this chapter, I have demonstrated that in respect of the benchmarking initiative, what change was effected through the policy process was different to that which had been intended at the policy intention stage.

I now identify a number of features of the policy process which have emerged from this policy trajectory study that can bring about policy refraction (Lingard and Garrick, 97:165) and have wider generalisability. However, I would develop slightly the concept of refraction. In the context of this study I would argue that policy intentions are not just bent out of alignment with policy intentions, but rather bent toward existing practice and either neutralised or offer only a surface relationship with the original policy objectives.

## **7.2 Key Findings of the Trajectory Study**

It has been shown that a typical feature of the policy process will be that players involved in it will of necessity have to interpret the policy intention and there are therefore implications for the outcome of the policy initiative arising from such interpretation.

The key findings below point to a tendency for the interpretation of those involved in the policy development process to interpret initiatives according to what is known, understood, established and practiced, and generally to move as small a distance as is possible from that position. This tendency will privilege the status quo. The key findings of the benchmarking initiative which are presented below have some wider generalisability for the policy process.

### ***Key Finding 1: Dichotomy, culture and neutralisation:***

Clay and Shaffer, and Biggs, have drawn attention to the dichotomous nature of policy making. They note that policy makers a) typically operate at some distance from the environment of practice in which the policy is to be implemented and b) frequently argue that problems which arise in the policy process relate to problems of implementation rather than problems of policy design. Biggs believes that policy makers use this argument as an 'escape hatch' by which to avoid the consequences of poor policy making. (Biggs, 1985:59, Clay and Shaffer, 1984:5).

I would modify the above analysis in contexts where policy initiatives are imposed on a professional group by forces outside that group. I propose that

the following analysis will be consistent across professional groups generally and not only to disciplinary communities in higher education:

Policy which seeks to influence professional practice requires expert knowledge of such practice. The implication of this is that members of the specific professional group will frequently be invited to be involved in the developments to effect changes required by the policy. The members of the professional group who will normally be nominated are those with greatest experience and who are held in greatest respect by their own peers in that community. These will be the elder statesmen or the disciplinary tribal elders. As mentioned in the previous chapter, these individuals are likely to be the very gatekeepers of ideologies which enshrine particular beliefs and practices. They may even have played a part in their inception. Where those experts have reservations about the policy initiative then they will seek to find means to minimise the effect and impact of the policy. The cumulative impact of successive, adjustments and reinterpretations and tacit understandings, can be to effect a 'neutralisation' of the policy initiative. This, I would argue has been a characteristic of the benchmarking initiative and such cumulative impact has been demonstrated through this policy trajectory study.

Following this line of argument and using the example of the benchmarking initiative, the idea of encapsulating academic standards in statements about threshold attainment was inconsistent with the ideologies of those elder statesmen to which the policy development had been handed. As I have demonstrated through this study, little of the outcome of the policy process initiated by Chapter 10 of the Dearing Report has had any real impact on those

matters which had been identified in that chapter as key problem areas requiring action. An observation here is that ‘neutralisation’ of policy through the policy process will be extended, incremental, quiet and ideological, in contrast to the pronouncements in the policy formulation stage which will typically be clamorous, high profile and political.

***Key finding 2: Gravitational pull toward the status quo***

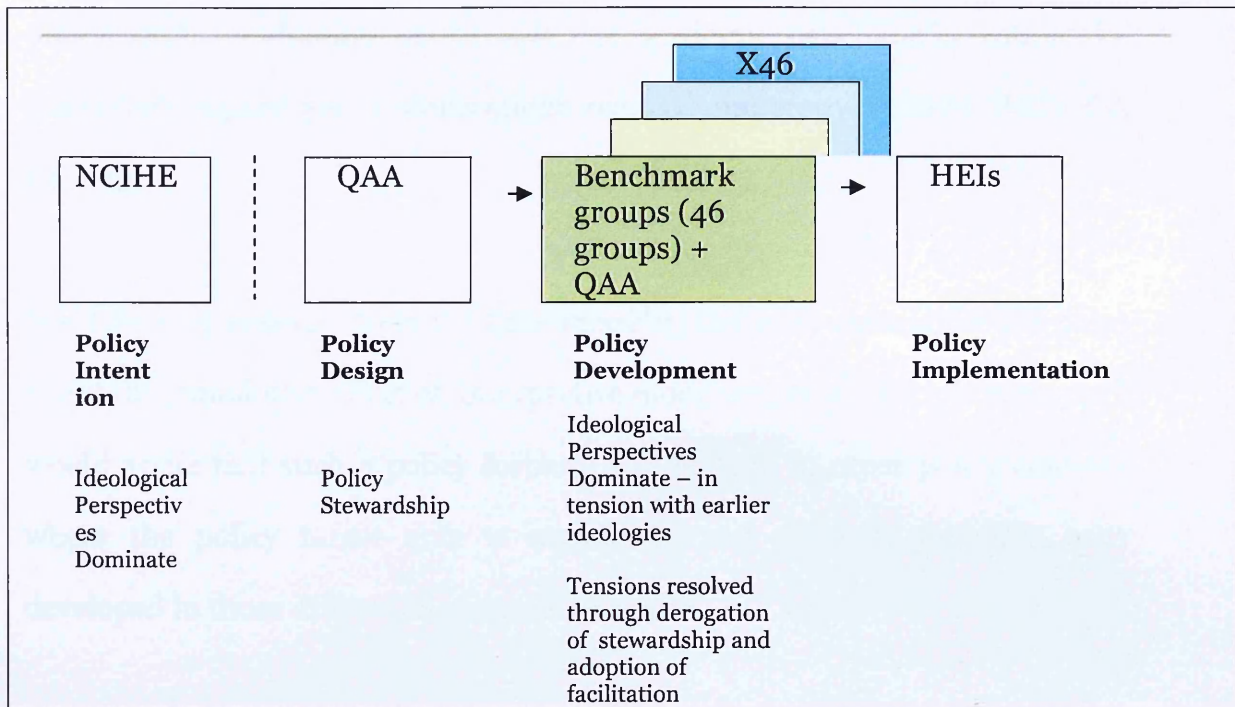
It has been revealed in this trajectory study, in Chapter 5 and particularly in table 5.7, that the QAA effected an interpretive shift of the policy intention (to secure the standards of awards) to fit pre-existing arrangements for subject level inspections in HEIs. It has been further revealed that in a subsequent stage of the policy trajectory, the benchmarking groups effected a similar interpretive shift: they interpreted their brief to devise benchmark information on standards, as something other than that: the preparation of benchmark statements. Such statements, in their own words were designed to be ‘unrestrictive’, ‘flexible’, providing considerable ‘latitude’, and which could not be used against a department within a TQI style inspection. So from these different stages of the policy trajectory it can be seen that different participants sought to interpret the task less in the terms of the pronouncements made in the policy formation stage and rather more in the terms of what was already available, understood, established and practiced. Thus the QAA, sought to use the policy initiative to confirm and continue its practice of subject based inspections on the sector, and the benchmarking groups sought to use the initiative to capture that which was distinctive in the subject, ie current. I would argue there are therefore two instances in a single policy process where key participants within that process have sought in their contribution to the

policy process to ensure that actions replicated what was currently in place rather than devise means by which to respond to the pronouncements in the policy formulation.

I suggest that the incidence of this tendency to revert to what is already known and practiced is a common feature of the policy process. I further propose that the actions of 'street level bureaucrats' described by Lipsky and referred to earlier in this study, will typically intensify the tendency.

***Key finding 3: Multi-partition: cumulative effect of interpretive modification in multiple contexts: gravitational pull toward the status quo.***

Whilst there are literatures on dichotomy, ie mutually exclusive bipartition in policy making, there is little reference to multi-partition. However, as the benchmarking policy initiative has shown, this can be a feature of the policy process.



**Fig 8 Diagrammatic representation of the benchmarking policy process highlighting compartmentalisation characteristics**

The issue of different cultures emerged as an issue for the benchmarking policy process. Each compartmentalised area had its own audiences and its own ideologies and beliefs. Different social actors within those compartmentalised areas made sense of the policy situation in various ways and in their own terms.

In such a scenario so much variation and complexity will arise across the policy target area that the potential for commonality will be very limited. The problem for those stewarding the policy process will be to effect some means of appearing to manage that variation. I would argue that the tendency in such a situation will be to find a way to revert to what is understood. The scenario again is that the gravitational pull will be toward the status quo.

In the benchmarking initiative this was achieved through a demotion of the policy, and a reduction of the role of academic benchmarks within the inspection regime and a consequent reduced imperative within HEI's QA regimes.

The following example from the benchmarking initiative exemplifies the point about the cumulative effect of interpretive modification in multiple contexts. I would argue that such a policy scenario will happen in other policy contexts where the policy target area is segmented and different practices have developed in those different segmented contexts.

*Example drawn from the benchmarking initiative*

The whole of the benchmarking policy process was segmented so that different actors with different perspectives exerted their influence on the policy initiative at different stages making for discontinuity and providing the potential for internal incoherence across the policy process as a whole. The benchmarking initiative was created in one social and cultural context - the NCIHE - was passed forward for development in quite a different social and cultural context - the QAA - and then passed forward again for detailed development to the subject benchmarking groups, which represented a further 42 quite different cultural contexts. All this before being passed to the sector for implementation. Importantly, at each stage there could be expected to be strong differences in ideology and values. In particular:

- *NICHE's report constructed the HE sector as failing society over a whole range of issues. Its agenda sought to foster higher education as a resource to support the government's economic strategy, an agenda not central to HE's ethos.*
- *The Agency appeared to respond primarily to the urgency implied by the NICHE recommendation, and emphasised by government (DfEE Feb 1998). The Agency seemed not to recognise immediately the ideological dimensions and consequent implications of the benchmarking task. As the policy process progressed the concern of the Agency appeared to move away from adherence to the requirements of the Dearing agenda and to exhibit some sympathy with the ideology of the benchmarking groups.*
- *the benchmarking groups could be expected to identify higher education as a force for equality and social good, importantly to have a different ideological perspective from that of the NICHE, from that of QAA and indeed from other disciplinary groups.*

Multi-partition as a feature of the policy process presents especial challenges for the policy process as has been revealed by this trajectory study, suggesting that initial scrutiny to establish feasibility is a necessary prerequisite to imposition of policy dictat.

#### ***Key Finding 4: Unsound policy and the status quo***

Focussing first on the earliest stage of the policy process: policy intention, Ball, rejecting models of purposive, logical, incremental policy development proposes that policy formulation is subject to influences, compromises and negotiation, resulting in policy which may not be coherent or clear. (Ball, 1994:16).



The problem is that current models of policy making do not provide a mechanism for recognising and responding when basic and fundamental problems become evident early in the policy process. There is not a mechanism for halting a process which self evidently can not lead to the outcomes it is charged to develop, and indeed can only press forward however unsatisfactory the prospective product of that action is likely to be.

In the example of the benchmarking initiative, key participants with a role in developing the policy forward did not consider that the policy was clear or capable of operationalisation.

*if the truth be known, we had very little conception of what we were asking the groups to do.... Respondent 19 Senior member of staff at the QAA.*

*"I did not believe it was possible to establish absolute standards. We work on a set of qualitative judgements, it is hard to pin down. This is not only true of TRS but of a whole range of subjects. Many academics will recognise that a mark is a symbol, and that judgements are supported by criterion referents. Respondent 7.*

Where a policy initiative is not clear and where there is antagonism toward it there can be expected to be considerable manoeuvring within the policy process to exploit whatever ambiguity exists to maintain the status quo. Maintenance of the status quo is likely to be seen as a damage limitation strategy. It is likely that public money will be spent on policy which may will lead to a version of the current situation with a veneer of change to effect the appearance that something has been achieved.

## **Key finding 5 : Differential support for different stages of the policy process**

In the earlier parts of this chapter I focussed on segmented or compartmentalised policy processes. In this section I am drawing attention to a related matter, that the expertise and resources available in different segments of the policy process can be variable and that where that is so, there will be a potential impact on the outcome of the policy consequent upon that differential. An aspect of this characteristic is that there can also be an imbalance in the power and authority available at different stages of the policy process. Where such an imbalance exists it will affect the outcome of the policy.

*Example drawn from the benchmarking initiative.*

In the benchmarking initiative there was considerable care and attention paid to the composition of the policy formulating body, its collective expertise and strengths. Comparatively little care and attention was paid to subsequent stages, in particular the resources available to the Agency to manage a complex political and ideologically fraught policy scenario were modest. Once NCIHE had disbanded and had referred a considerable agenda to the Agency, only one assistant director supported by a small number of officers were assigned to the project to carry it forward.

Once transferred to the Agency then issues of competence become evident as demonstrated by the quotations below.

*“...there was a certain amount of making policy on the hoof going on with the ground notionally shifting a bit. Respondent 9*

*“I think there was too much improvisation going on. The overall architecture was not properly developed Respondent 5*

*“When we set up the three pilot groups, if the truth be known, we had very little conception of what we were asking the groups to do. Respondent 19*

Not only was the robustness of the arrangements for stewarding the benchmarking policy process diminished once the initiative was referred to the Agency, but the authority and expertise in the Agency was patently insufficient to counter the authority, influence and power available to the benchmarking groups comprising eminent academics from across UK Universities. There was self evidently an unequal power relationship within the policy process.

It is clear from this study that the benchmarking groups did invoke the full power of their disciplinary communities. The effect of that interaction was such that the power within that stage of the process was considerably amplified by the weight of that explicit support from outside the policy process.

*“We e-mailed it to everyone we could get hold of, and we got a lot of very helpful stuff back. Almost all of it was supportive. That was another area of tension, they did not want us to circulate material as it got developed. They wanted one document to go out for consultation. Well, we wanted to get feedback. We sent material round by e-mail.*

*Well they kept saying – well the process is....And we just responded by saying that this is a different community and we work this way. You can't do physics unless you share physics. (respondent 13)*

*“There was a consultation mechanism which the QAA planned to put into effect, but I did not think that was enough to protect me and I attempted to pre-empt any difficulties of that time. I am the Chairman of the Heads of University Biological*

*Sciences, and what we did was to put the drafts of the documents on the website of the organisation for prior consultation at all stages. (respondent 17)*

*“We could not assume that because we had been nominated to do the task that the statement would be acceptable. Consultation had to be a reality. (respondent 6)*

The effect of the above meant that it was almost inevitable that the Agency became hosts to a process orchestrated by the benchmarking groups supported by their disciplinary communities, and indeed the Agency came to see themselves, not as stewards of the policy process but of facilitating the project which the disciplinary communities came to make their own:

*“ And if you think of the process that we facilitated, it was primarily through developing an indicative brief which basically asked the subject community - and I use the term because we used it all the time in the work with the groups - to celebrate their subject.... (respondent 19).*

There was no mechanism within the design of the policy process, (that QAA had itself developed) to resolve the tensions which subsequently emerged. Those charged with managing the policy process lost control of it and became mere facilitators.

Differential support then will tend to create tension between what was determined at the policy intention stage and an inclination toward neutralisation of those policy intentions where there are ideological objectives by those in the later stages of the process where those different actors are able to exert influence. The outcome will be a tendency toward the status quo.

## **Key finding 6: The relevance window: issues of timing, currency and relevance**

The final key finding from the study relates to currency. An emergent feature of this policy study has been that policy initiatives are borne of a particular time, and are the product of a set of circumstances that come together at that particular point in time. In the case of the benchmarking initiative, these circumstances were accompanied by specific development discourse. This can be a problem where the policy initiative results in an agenda which can take many years to implement. Political attention moves on, the discourse diminishes and perceptions about the issue change, actors change, alternative solutions appear more appealing, pertinent and practical. This can also influence the commitment and resources which are made available. Diminution of the importance of the policy initiative as that issue gets overtaken by other events and concerns might impact on its relevance. Such change external to the policy process is of course more likely in a dynamic and changing environment such as higher education. This suggests that in turbulent environments, policy initiatives are likely to have a relatively limited time in which to be identified and implemented, since new concerns and issues having a bearing on the policy area will continue to emerge and take centre stage. The idea of the problem will become redefined and reframed. This is important because it suggests an in-built transience to policy initiatives in turbulent policy environments. It also suggests that where this is unrecognised then there will be an accumulation of slow-gestating policy initiatives, some of which are maintained even though they may no longer have clear relevance.

*An example drawn from the benchmarking initiative*

The Dearing Report and the suite of changes it envisaged, including benchmarking, implied an agenda of work that needed many years to take forward. However all things do not remain equal and this too impacts on the policy process: constraints evolve and imperatives change. So too with the benchmark statements.

There is a point here about the government's own role in this policy trajectory: a mere three years separated the DfEE resounding endorsement of the Dearing recommendations in 1988 and its statements about the urgent need to deal with serious problems over educational provision and standards, and the Blunkett statement in 2001 which dismantled a significant proportion of that work. In February 1988 the work on standards was high priority for UK HEIs. In March 2001, the Government's stance was that there was not a problem with the standards and quality of HE programmes. This scenario could be read as another example of the HE sector gaining the advantage in the policy struggle. However a more likely scenario is that policy imperatives was be overtaken by events and ran out of time.

### **7.3 Summary, Evaluation of answers to research questions, and Reflections**

The research questions and a summary of the answers elaborated throughout this study are provided below together with an elaboration of the truth that can be claimed in respect of those answers.

#### **1. To what extent was there unanimity or diversity about *policy intentions* at different treads of the policy development stair case?**

I have demonstrated, drawing on the commentaries of those involved in the benchmarking process that there was not unanimity in respect of policy intentions. I have drawn attention to 'interpretive shifts' as the initiative progressed from one stage to the next. The commentaries provided by interviewees were supported by published textual resources and by factual evidence. In particular there were interpretive switches at the point the initiative was handed from the Dearing Committee to the QAA in that the standard of 'awards' became standards at 'subject level' and also in the early months of the work of the benchmarking groups when there was an interpretive shift from 'standards' to 'statements'. These and other key moments in the policy process have been demonstrated through an audit of textual resources over the life cycle of the initiative.

On the matter of interviews, these were rigorous in their collection and execution. All were conducted on a one to one basis each lasting a minimum of an hour. They were recorded on a tape recorder and transcribed meticulously. They are therefore accurate and 'truthful' in their own individual

terms and collectively offer some insight into shared values and ideologies of specific sub-groups of professional academics. I have sought to show, from examination of the interviews, a shared belief held by those on the benchmarking groups in the importance for control and stewardship of the curriculum to reside with academics and to contest vigorously attempts directed at increased central government control. I have also shown defensiveness of benchmarking members toward some issues raised by the benchmarking initiative.

## **2. To what extent was there unanimity or diversity in *policy development* at different treads of the staircase?**

In response to research question 2 I have been able to show that the benchmarking groups were able to develop benchmarks each in their own distinctive way and that the intention to use the benchmarks as mechanism to secure external confirmation of standards, a key requirement of the policy initiative, was abandoned. I supported this general observation of the individualistic approach to the development of the benchmarks by drawing on the careful analysis of a set of benchmarks undertaken by two other researchers working in this area, which demonstrated unequivocally considerable variation between the benchmarks. The answer to research question 2 is factual and unambiguous.



### 3. What explanations can be found for the divergence between policy intentions and policy outcomes?

I have identified a range of explanations for divergence between policy intentions and outcomes in chapter 6. The summary presented at the conclusion of chapter 6 is repeated here.

1. The conflation of the objective (to make the standards of degrees more explicit), with the means by which the objective was to be achieved (benchmarks), created considerable confusion about what was to be produced. Lack of clarity is likely to have facilitated any prospective neutralisation of the policy by the benchmarking groups.

2. The instability and lack of a shared understanding of the central concepts: 'academic standards' 'benchmarks' 'threshold standards' across the different audiences which contributed to the policy initiative

3. The re-interpretation by the QAA of the Dearing recommendation 25 so that the focus of the exercise became **subjects**, rather than as intended **awards**. Chapter 10 of the NICHE report focuses upon "the comparability and consistency of standards of **awards**".

4. Prioritisation of the development of the benchmarks before the development of the qualifications framework, into which the benchmarks were to fit. An added significance of this is that the specification of the standard of an honours degree within the qualifications framework was to have supported

the specification of the standards of other awards, so that there was improved consistency across the portfolio of awards typically offered in the sector.

5. The slippage of terminology and policy purpose effected by the adoption of the term benchmark **statements** to replace the term benchmark **standards** which had been current since the Committee reported, until the publication of the pilot group benchmarks.

6. The slippage of intended purpose effected by the QAA so that benchmarks would not be used in judgements of standards, by examiners external the institute, but would be used as general 'referents' to be used internally in the development or review of programmes.

7. The volume of work referred to QAA by Dearing, the imperatives to complete a range of new initiatives within a short space of time, the newness of the organisation and possibly embryonic channels of communication across the Agency may all have inhibited fully effective operations.

8. The lack of clear expectations provided for the benchmarking groups

9. The mistrust which existed between members of the benchmarking groups in this study and the QAA, which might be representative of a general view of the sector toward the Agency, particularly after the Dearing Report which systematically undermined the reputation of the sector.

10. The generalised concern by the benchmarking groups in this study about the purpose to which the benchmarks would be used.

The 'truth' which can be claimed in respect of the 10 points above are set out below:

*Points 1, 3, 4, 5, 6* are substantiated by factual evidence and their truth is not open to interpretation.

*Point 2* relates to the absence of a shared understanding about central concepts across different audiences. The truth of this can be argued in respect of the concept of academic standards in that nowhere in the whole undertaking is the concept of academic standards defined. In particular, whilst Chapter 10 of the report of the NCIHE makes considerable reference to 'standards' it does not define what it means by that term. A number of academics on the benchmarking groups selected for this study, who can be seen to be professionally closest to the concept, argued that it is difficult to define, and suggested too that the Dearing Committee may have had a simplistic and partial understanding of that concept. Whilst there is a definition of the concept of academic standard in the Graduate Standards Programme, and this has been presented in chapter 4, it can be argued that given the prevalence of the term within the policy process, a definition within the process is notable by its absence.

In term of the idea of "benchmarking", as has been shown in chapter 4, this is a concept drawn from management practice and had not been widely used in academia. Hence is unlikely to have had any intrinsic meaning to those on the disciplinary groups selected for this study and perhaps little to most other

disciplinary groups. The benchmarking groups had indicated that in their view, the term applied to academic standards was not clearly understood.

*Point 7* relates to the volume of work referred by the Dearing committee creating some pressure for the Agency is presented as 'truth' since the QAA described their agenda in exactly the terms presented in this study.

*Point 8.* The point about lack of clarity of expectations is claimed throughout the interviews provided by academics on the benchmark groups. The truth about lack of clarity can be substantiated by the Assistant Director in charge of the undertaking as presented in this chapter, who makes clear that there was not a clear view from the Agency as to what the benchmarking groups were to do. In terms of its 'truth', it is reasonable to assume that the benchmarking groups would have been willing to make much of what clarity did exist as facilitating their alternative agenda.

*Points 9 and 10* relates to mistrust between the benchmarking groups and the QAA. I would argue that there is face validity for this claim, sufficient to substantiate the arguments for mistrust presented in this dissertation and drawn from the interviews with academics. The tone and content of the Dearing Report was critical of the university sector, the sector was critical of the Report and in the light of recent inspection regimes, was apprehensive about prospective inspection regimes.

#### **4 What new critical insights about models of policy formation and policy development can be deduced from the study?**

In the final chapter of this study I have sought to demonstrate that there was a strong gravitational pull toward the status quo, ie what was known, and was practiced. I have argued that this will be a characteristic feature where policy situations are complex, and are characterised by competing ideologies, and where those participating in the policy process are the 'elder statesmen' of the policy target audience. In terms of truth claims of this assertion, I have demonstrated that throughout this particular policy trajectory this was a strong and persistent tendency occurring at a number of different stages. I conclude therefore that it is likely to be a feature of policies which have similar characteristics to the benchmarking initiative, ie are complex, involve powerful professional groups and stimulate ideological preferences.

The policy trajectory study has implications for policy makers. It suggests strongly that there be included within the policy process mechanisms which ensure that policy development is proceeding in accordance within the policy formulation stage, either through the continuing involvement of those responsible for the policy formulation or through some other monitoring arrangements. Such oversight would ensure that where policy is not capable of being executed in the way envisaged then it can be re considered and reformulated. The waste of resources and resultant policies which do not address the original requirements could therefore be very simply avoided.

*Commentary*

In this final chapter, I have drawn together key findings from the policy trajectory study which are generisable in terms of the policy process and which are of potential interest of policy makers. I have also attempted to evaluate the truth of the claims which I have made throughout the study.

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